

Director of Environmental Protection
Environmental Protection Department
27/F, Southorn Centre, 130 Hennessy Road
Wai Chai, Hong Kong
(Email: eiaocomment@epd.gov.hk, dep@epd.gov.hk)



香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立



國際鳥盟成員

30 Jun 2014

Dear Director,

Comments on the Kau Sai Chau Gold Academy - Project Profile

The Hong Kong Bird Watching Society (HKBWS) would like to raise our comments on the captioned project. Our concerns are stated below:

Protection measures for *Caridina trifasciata*

Given the restricted distribution and its “Vulnerable” IUCN status¹ of shrimp species, *Caridina trifasciata*, as identified in the Project Profile (PP)² the Proponent must fully investigate and consider a development layout that fulfills the EIAO-TM’s order of priority in impact mitigation³. This species has only been formally recorded in five streams in Hong Kong and one in mainland China. The importance of Kau Sai Chau is further emphasized as three of the five streams which this species is recorded in Hong Kong are located at Kau Sai Chau¹. Avoidance of habitat loss by adopting an alternative layout that would allow this species to thrive in their existing locality should be the first consideration. Minimization by the means of translocation should only be considered under the basis that there is an overriding public need for the project.

The need of the project as stated in the PP, is the lack of community golf outreach programs and golf industry management and training programs. With provision of the proposed development these needs would be met, also bringing social and economic benefits to the community⁴. The avoidance of *Caridina trifasciata* habitats by reducing the size of development layout would not significantly affect the benefits yield from the project, nor would it prevent the project from achieving its objective in providing community golf outreach programs and golf industry management and training programs. Furthermore, when weighing the importance between preserving the stream habitats for *Caridina trifasciata*

¹ IUCN Red List version 2014.1

² Section 4.1.4 of the Project Profile

³ Section 5.4 of Annex 16: Guidelines for Ecological Assessment of the EIAO-TM

⁴ Section 1.4.4 of the Project Profile

compared to the development of golf outreach and training programs, the preservation of streams is more important due to the fact that site selection for the development is not restricted to Kau Sai Chau, but whereas the suitable habitats for this shrimp species is restricted to Kau Sai Chau. Also, the provision of golf outreach and training programs does not qualify as an overriding public need to the community.

Translocation has been proposed as a potential minimization measure, however the success of such measures is unknown and there are no previous examples that prove the successfulness of translocating this species. Translocation requirements should be tightened so that its successfulness is proven before habitat disturbances take place. Once translocated, the population of shrimp should be monitored for a sufficient time period to prove its successfulness. The successfulness should also be determined according to a peer-reviewed methodology to the satisfaction of a qualified freshwater ecologist and the Agriculture, Fisheries and Conservation Department. Nonetheless, the precautionary principle of avoidance with a suitable development layout should be prioritized as the first mitigation measure, so that no adverse ecological impacts would arise. The layout should avoid direct habitat loss and indirect impacts (i.e. deterioration of water quality, change in flow rate of the stream, etc.) to this species.

The HKBWS respectfully requests the Environmental Protection Department to consider our comments above.

Yours faithfully,



Jocelyn Ho
Senior Conservation Officer
Hong Kong Bird Watching Society

cc:

Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong