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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY
Since 1957 成立

By email only

14 December 2015

Dear Ms. Wong,

Comments on the Hung Shui Kiu New Development Area
Revised Project Profile (ESB-291/2015)

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the captioned development. We consider that the ecological sensitive receivers in the area and the ecological impacts of the proposed development (e.g. habitat loss) should be properly identified and comprehensively assessed in order to ensure the proposed New Development Area (NDA) will not have adverse ecological impacts on the egret and the natural habitats in the Hung Shui Kiu (HSK) area.



1. Concerns on the San Sang San Tsuen Egret

In 2015, four nests were recorded at the San Sang Sun Tsuen egret¹, which comprises of Little Egret (*Egretta garzetta*) and Chinese Pond Heron (*Ardeola bacchus*). The nearby agricultural lands and the Tin Shui Wai drainage channel are foraging grounds for the ardeids. However, breeding egrets are susceptible to disturbance by human activities. The presence of human disturbances close to nesting colonies may discourage ardeids from nesting², or even lead to abandonment of their breeding areas or nestlings. As such, the HKBWS would like to suggest the followings:

- i. The San Sang Sun Tsuen Egret should be included as an ecological sensitive receiver in Section 4.5 of the Revised Project Profile (PP) so that any potential impacts arising from the project can be adequately assessed in the Environmental Impact Assessment report.
- ii. Egret flight line surveys should be conducted to properly assess whether the proposed land use for HSK NDA would have adverse impacts on the flight paths of the ardeids.

¹ Anon, 2015. *Summer 2015 Report: Egret Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site*. Report by The Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong Special Administrative Region Government.

² Wong, C.L.C. and Woo, L.C.K. 2003. *Egret counts in Hong Kong, with particular reference to the Mai Po Inner Deep Bay Ramsar Site: Summer 2003 Report*. The Hong Kong Bird Watching Society.

- iii. Careful phasing of construction program should be considered to avoid/minimize disturbance impacts during the breeding season of ardeids, which is between March and August inclusively.
- iv. The increase in risk of bird collision arising from the project should be assessed.

2. The ecological value of agricultural lands

Wet agricultural lands, both active and fallow, are important foraging grounds for waterbirds and wetland-dependent species, including species of conservation importance like Greater Painted-snipe (*Rostratula benghalensis*), Chinese Pond Heron (*Ardeola bacchus*), Red-billed Starling (*Spodiopsar sericeus*), as well as Zitting Cisticola (*Cisticola juncidis*)³. Freshwater wetland habitats and fallow wet agricultural lands are currently under-represented in the protected areas in Hong Kong and are vulnerable to destruction⁴. During our recent site visit to HSK, there are still active wet and dry agricultural lands in the area (Figure 1).

According to HKBWS bird records, approximately 293 species of birds are recorded in the agricultural lands of Hong Kong. This constitutes 55% of the total bird species in Hong Kong⁵ and 20% of the total bird species in China⁶. Among them, almost half of the species recorded (140 species) are regarded as of conservation importance. This indicates that the agricultural land in Hong Kong supports a high diversity of birds. It should be noted that the bird composition of waterbirds and wetland dependent bird species found in wet agricultural land is different from that in the wetlands of the Deep Bay area. Although there are some overlaps of the bird species in these two habitats, agricultural land should be seen separately as a unique habitat. The ecological value of the agricultural lands and the impacts of the development project on this habitat in HSK should be comprehensively assessed.

3. The on-going loss of natural habitats

There are differences in the descriptions and conditions of habitats as the different stages of public consultations proceed from 2010 to 2015. In the PP for the HSK NDA submitted to the EPD in 2011, it stated that “an area of wet agricultural land covers approximately 20 ha in the southern part of the NDA”⁷. However, in the current PP, it only mentioned “there is agricultural land in the HSK NDA”.

³ Wong, L.C., Lam, V.W.Y. & Ades, G.W.J. (eds.). 2009. *Ecology of the Birds of Hong Kong*. Kadoorie Farm and Botanic Garden.

⁴ Yip, J.Y., Corlett, R.T. and Dudgeon, D. 2004. A fine-scale gap analysis of the existing protected area system in Hong Kong, China. *Biodiversity and Conservation* 13.5: 943-57.

⁵ The total number of bird species in Hong Kong is 531.

⁶ According to the CBR Checklist of Birds of China v3.0 (2013), the total number of bird species in China is 1434.

⁷ Section 4.5.2 of the HSK NDA Project Profile prepared by CEDD in 2011

In the Stage 1 Community Engagement, it was identified that there were about 102.7 hectares of agricultural lands (13%) in the NDA⁸. Seven types of ecological features were also identified in the HSK area then, including ponds, marsh, woodlands, compensatory wetlands, conservation areas, egret, and agricultural lands (Figure 2). However, during the past few years, fishponds/marsh/wetlands/arable lands were filled or disturbed, and agricultural lands were left abandoned (Figure 3), probably due to the announcement of the HSK development in late 2010. We consider that the ecological baseline condition should be taken as early as possible (i.e. referring to the ecological data taken during 2011 - 2012). The changes in the habitats in the HSK area during the past few years should be recorded and well-documented. Appropriate mitigation and compensation measures should be proposed for the loss of habitats and ecological value caused by the commencement of the public consultation and the actual NDA development.

The HKBWS hopes that our comments would be taken into consideration during the consultation process. Thank you for your kind attention.

Yours faithfully,



Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.

CEDD - Mr. Michael FONG, Chief Engineer/ New Territories West 3
The Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

⁸ 13% of the total area of the HSK NDA is agricultural land (790 ha). Figures are provided in p.5 and p.7 of the Stage 1 Community Digest.

Figure 1. The active wet (top) and dry (bottom) agricultural lands in the HSK area.



Figure 2. The ecological features (left) and agricultural lands (right) presented in the Stage 1 Community Engagement Digest. The approximate boundary of the RODP is indicated in blue colour.

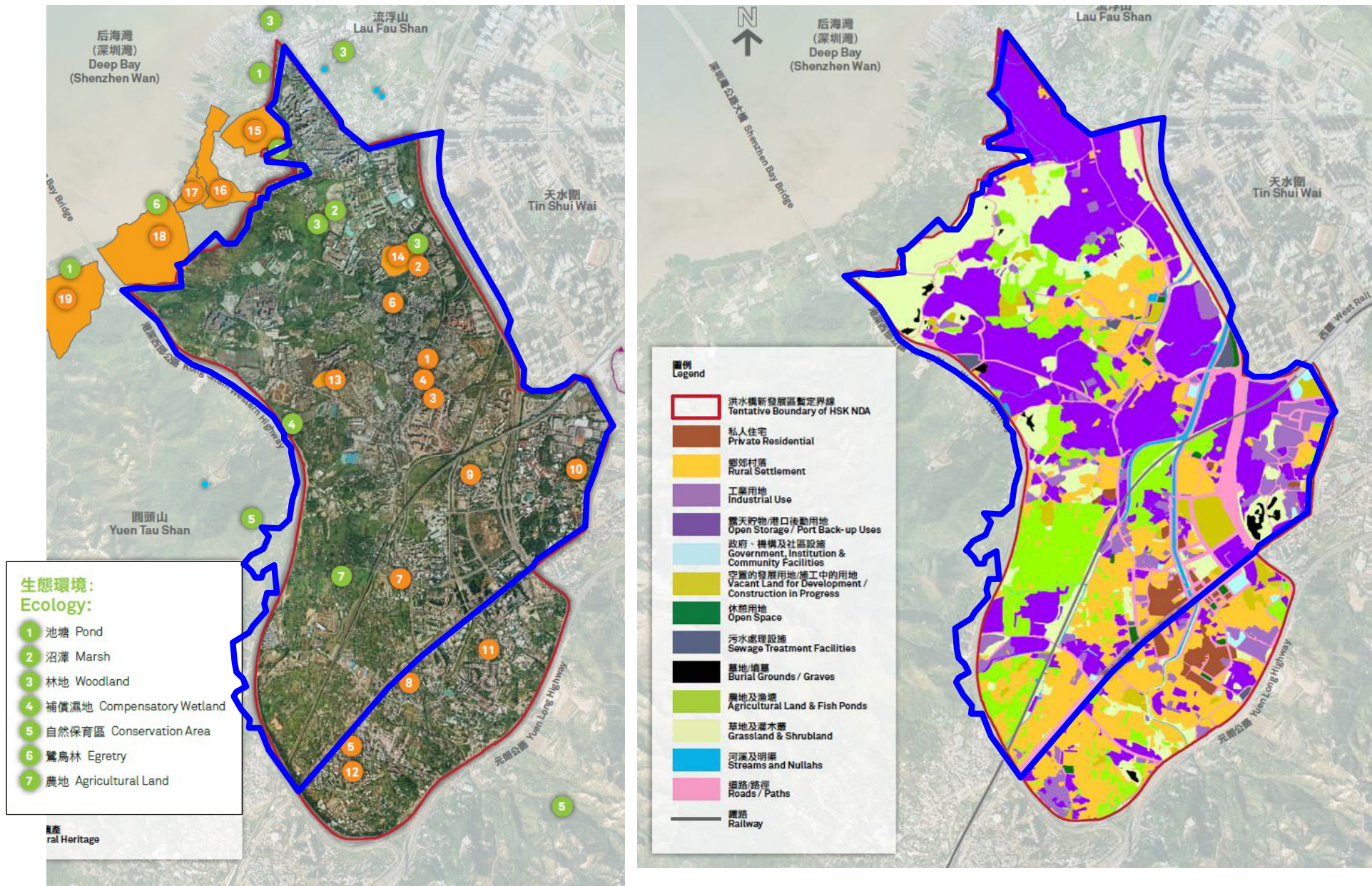


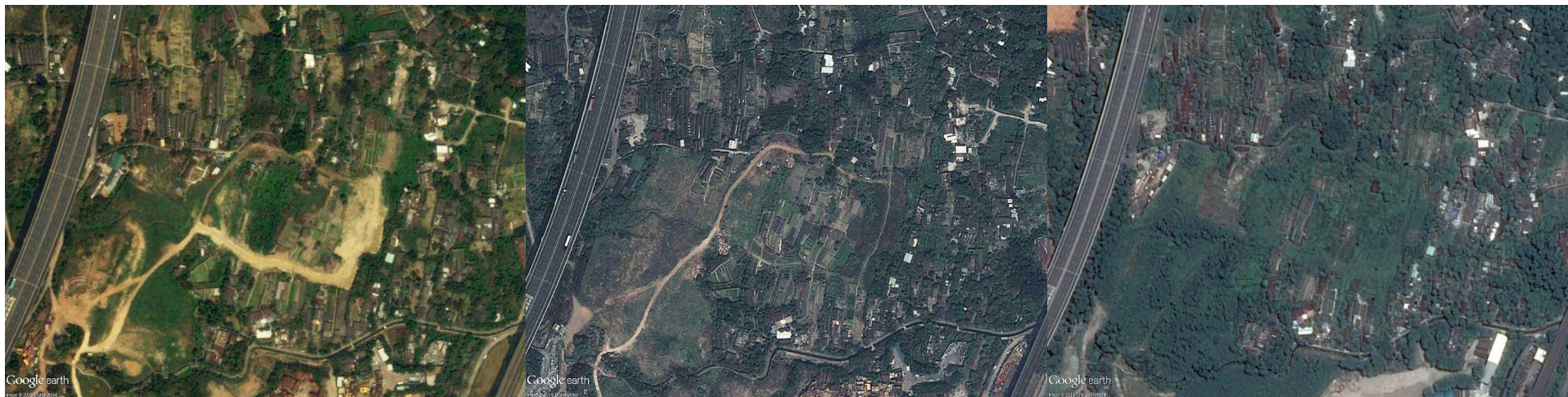
Figure 3. Side-by-side comparison of Google Earth aerial photographs taken on 11 April 2011, 12 March 2013 and 25 August 2015 near Fung Kong Tsuen (top) and Tin Sam Tsuen (bottom) within the HSK NDA.



2011: A pond/marsh is still present

2013: The pond/marsh is filled and paved

2015: More vegetation clearance/land filling is observed



2011: Farmlands were active, even though a mud track was created

2013: Many active farmlands

2015: Many abandoned farmlands