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

By email only

1 January 2016

Dear Ms. Wong,

**Comments on the Tung Chung New Town Extension
Environmental Impact Assessment Report (EIA-233/2015)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the captioned development. In order to ensure the Tung Chung New Town Extension development will not have adverse and irreversible impacts on the sensitive habitats and biodiversity in the Tung Chung area, we consider that the ecological impacts of the development should be properly identified and comprehensively assessed, and effective avoidance/mitigation/ compensation measures should be implemented in advance.



1. The terrestrial ecological impacts of the development is underestimated

There are “Village Type Development” (V) zones in the proposed Recommended Outline Development Plan (RODP) of Tung Chung West; however, the habitat loss caused by village development is excluded in the assessment¹. According to Figure 9.6a, the V zones (i.e. Ngau Au, Lam Che, Nim Yuen, Mok Ka and Shek Mun Kap) encroach Fung Shui woodlands, mature woodlands, young woodlands and tributaries of the Tung Chung River. Tree felling and vegetation clearance would be required during village development. We are concerned further habitat loss would be caused and lead to adverse impacts on woodland dependent bird species of conservation concern, such as the Crested Goshawk *Accipiter trivirgatus* (which is a Class 2 protected animal of China and is listed in Appendix II of CITES) and Common Emerald Dove *Chalcophaps indica* (which is listed as rare in China Red Data Book). Village development immediately adjacent to the tributaries would also lead to water pollution in the Tung Chung River and increase in human disturbances. Therefore, we consider that the habitat loss caused by V zones should be included in the assessment to protect the integrity of the river system in Tung Chung West.

¹ Section 9.6.1.5 of the Ecological Impact Assessment

2. Adverse impacts on Chinese White Dolphin in North Lantau

A number of large-scale projects have been proposed in North Lantau, including reclamation works at Siu Ho Wan, third runway for the Hong Kong international airport, Hong Kong-Zhuhai-Macao bridge and Tuen Mun-Chek Lap Kok Link Road. We are concerned about the cumulative impacts on the marine ecology of North Lantau from the reclamation and construction works of these projects as well as that in Tung Chung East. The North Lantau waters are important to Chinese White Dolphins (CWD) *Sousa chinensis*; however, their abundance is already declining since the construction of the Hong Kong-Zhuhai-Macao Bridge and dropped to an exceptionally low level in 2014².

In the current proposed project, 145 ha of seabed will be reclaimed in the Tung Chung East area. The number of marine works vessels travelling in the area can reach up to 42-56 vessels per day and it is “unavoidable” that the works vessels need to use The Brothers Marine Park³. We are concerned the busy marine traffic in the North Lantau waters will adversely affect the conservation performance of The Brothers Marine Park and further disturb the habitats of CWD. We consider that the impacts of the construction and reclamation of the Tung Chung East area on CWD is underestimated.

3. Conservation first

Given the ecological sensitivity of the river system in Tung Chung West, the sewerage system, Sustainable Urban Drainage System, polder scheme and River Park should be constructed well before any other developments in the Tung Chung West area. Moreover, in order to protect the CWD in the North Lantau waters, we consider that the work barges should not enter The Brothers Marine Park and new Marine Parks should be established (i.e. in West Lantau waters around Tai O and Fan Lau) for compensating the loss of CWD habitats and the disturbance to CWD caused. It is important that all conservation measures are implemented before any construction work commences to avoid adverse and irreversible impacts to these ecologically sensitive areas and species of conservation concern.

A joint letter representing views from 9 Green Groups was submitted on 31 December 2015. The HKBWS respectfully requests the Director of Environmental Protection would also fully address the concerns stated in the joint letter as well as ours as stated above. Thank you for your kind attention.

² Monitoring of Marine Mammals in Hong Kong Waters (2014-15) Final report. Submitted by Hong Kong Cetacean Research Project to the Agriculture, Fisheries and Conservation Department.

³ Section 9.7.7.13-14 of the Ecological Impact Assessment

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', written in a cursive style.

Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.
The Conservancy Association
Designing Hong Kong
Green Power
Kadoorie Farm and Botanic Garden
WWF – Hong Kong