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

By email only

20 May 2016

Dear Ms. Wong,

Comments on the Project Profile for the Hong Kong Offshore LNG Terminal
(ESB-292/2016)

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the captioned project. The current project profile failed to identify the potential impacts of the proposed project on birds, particularly seabirds, migratory birds and the breeding site of White-bellied Sea Eagle (*Haliaeetus leucogaster*). We consider that a comprehensive ecological baseline survey for avifauna should be conducted and all potential ecological impacts on birds should be fully identified and assessed. Our concerns on the proposed project are as follows:



1. Adverse impacts on the breeding site of White-bellied Sea Eagle

White-bellied Sea Eagle (WBSE) is an uncommon resident in coastal areas and offshore islands in Hong Kong¹ and is listed as a Class II protected species in China². According to the studies conducted by Agriculture, Fisheries and Conservation Department³ and the HKBWS⁴, Shek Kwu Chau is an active breeding site of WBSE. The proposed Floating Storage and Regasification Unit (FSRU) is approximately 5km southwest of the breeding site. We are concerned the construction and operation of the FSRU (including the increase in marine traffic caused) would increase the disturbance to the breeding site and the breeding birds. The construction work of the subsea pipelines and the cooled water discharged from the regasification facilities

¹ Carey, G.J., Chalmers, M.L., Diskin, D.A., Kennerley, P.R., Leader, P.J., Leven, M.R., Lewthwaite, R.W., Melville, D.S., Turnbull, M. and Young, L. (2001). *The Avifauna of Hong Kong*. Hong Kong Bird Watching Society.

² List of Wild Animals under State Protection (promulgated by State Forestry Administration and Ministry of Agriculture on 14 January, 1989).

³ So, W.Y.I and Lee, W.H. (2010). Breeding ecology of White-bellied Sea Eagle in Hong Kong - A review and update. *Hong Kong Biodiversity - Agriculture, Fisheries and Conservation Department Newsletter Issue No. 18*. Agriculture, Fisheries and Conservation Department.

⁴ HKBWS. (2012). *Breeding Ecology of White-bellied Sea Eagle in Hong Kong*. The Hong Kong Bird Watching Society.

would have adverse marine and fisheries impacts, thus deteriorate the foraging ground for WBSE and may affect the birds' breeding success.

2. Adverse impacts on seabirds

Hong Kong is located on the East Asian-Australasian Flyway. Tens of thousands of seabirds migrate through the South China Sea from wintering grounds in the tropics to breeding grounds off East China, Korea and Japan, in spring moving north and in autumn returning south. Migrating seabirds can be seen in the southern waters of Hong Kong, and possibly where the proposed project is located. The at-sea installation of the FSRU, the construction of the subsea pipelines, the cooled water generated from the regasification facilities and the increase in marine traffic during the operation phase may have potential adverse ecological impacts on seabirds.

3. Adverse impacts on migratory birds

Besides seabirds, many millions of land birds also migrate along the East Asian-Australasian Flyway and stop over at Hong Kong for refueling and resting before heading to their next destination. Studies have shown that birds usually migrate during nighttime and are easily attracted to fires and artificial light during migration^{5,6}. A recent article also showed concerns on gas flaring at offshore facilities as it causes massive bird death⁷. In sections 2.4 and 2.10.1 of the project profile, it stated that there would be gas send-out process areas (including flare and utilities area) and the FSUR facility will be operating on a 24-hour, 365 days a year basis. We are concerned the artificial lighting and the flare at the proposed FSUR would attract migratory birds at night, leading to death or injury by burning or impact on the windows or facilities on the FSUR. If any globally threatened or endangered bird species would be affected, it may lead to a significant impact on the viability of the species' world population.

Due to the adverse impacts on birds as mentioned above, the HKBWS would like to suggest the following:

- i. The breeding site of WBSE and any birds of conservation concern recorded in the area should be included as ecological sensitive receivers. Any potential impacts arising from the project should be adequately assessed in the Environmental Impact Assessment report.

⁵ Wiese, F. K., Montevecchi, W. A., Davoren, G. K., Huettmann, F., Diamond, A. W., & Linke, J. (2001). Seabirds at risk around offshore oil platforms in the North-west Atlantic. *Marine Pollution Bulletin*, 42(12), 1285-1290.

⁶ Gauthreaux Jr, S. A., & Belser, C. G. (2006). Effects of artificial night lighting on migrating birds. *Ecological consequences of artificial night lighting* (C. Rich and T. Longcore, Editors). Island Press, Washington, DC, USA, 67-93.

⁷ <http://www.eenews.net/stories/1059988683>

- ii. A comprehensive avifauna baseline survey with a duration of a least 12 consecutive months should be conducted. Special attention should be paid during the breeding season of WBSE and the bird migratory seasons.
- iii. The migratory route and any flight paths of birds should be identified.
- iv. The risk of bird collision and the impacts of flare on birds should be adequately assessed.
- v. All direct, indirect and residual impacts on birds should be identified and adequately assessed to avoid any adverse ecological impacts.

We hope that our comments and recommendations would be taken into consideration during the consultation process. Thank you for your kind attention.

Yours sincerely,



Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

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