



**BY EMAIL ONLY**

**Director of Environmental Protection**

EIA Ordinance Register Office

Environmental Protection Department

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Dear Sir,

**Project Profile for  
Upgrading of Tai Po Sewage Treatment Works (TPSTW)**

Green Power would like to draw your attention to our concerns about the above-captioned project.

1. Green Power supports TPSTW to provide effluent reuse and co-digestion facilities for imported sewage sludge and organic/pre-treated food waste to promote water conservation and waste reduction respectively.
2. Regarding reducing the carbon footprint of TPSTW, we appreciate that renewable energy is planned to be utilized for TPSTW, and surplus biogas and electricity produced is considered to supply to The Hong Kong and China Gas Company Limited (Towngas) and CLP Power Hong Kong Limited (CLP Power).
3. Surface runoff generated from the site during construction phase should be prevented from discharging into stormwater drainage and Tolo Harbour directly because the turnover rate of seawater of engulfed Tolo Harbour is low and unfavourable for dispersal and dilution of pollutants in stormwater. Additional pollution load should be avoided to protect the marine water quality and ecology of Tolo Harbour.
4. Same as current practice, the effluent of TPSTW after upgrading will be conveyed to Kai Tak River for disposal through the pipelines of the Tolo Harbour Effluent Export Scheme (THEES). Therefore, the effluent should be of good quality, free of odour and harmless to organisms inhabited or foraging in Kai Tak River (e.g. freshwater fish and egrets).
5. The amount of solid wastes, such as C & D wastes, soil and rocks, contaminated soil generated from the proposed project has not been mentioned in the project profile. As most of the areas adjoining the project site are vehicular accessible countryside places and seashores, any fly-tipping of such solid wastes generated from this project will be hard to combat. Even if such incidents are spotted, reinstatement can seldom be implemented because of various reasons such as land ownership, landuse zoning and etc.
6. Therefore, generation, transportation and disposal of such solid wastes should be under stricter control, especially for contaminated soil. The mitigated measures to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed project should be considered to be incorporated into the specifications of the works contract.

7. TPSTW is an important pre-roosting site of the vulnerable Collared Crow and a potential night roost of ardeids. Disturbing and noisy construction procedures of the proposed project and human disturbance should be restricted to minimize potential impacts on Collared Crow and ardeids during construction phase. Therefore, the construction site should be well masked if necessary. Avoidance of human disturbance, including noise and glare, is also important in operation phase.
8. As food waste and sewage sludge from other STWs may be transported to TPSTW via tankers or pipelines for co-digestion and dewatered sludge will be exported. Measures to prevent generation of odour by the facilities in association with co-digestion of organic wastes, and transport of sludge and food waste should be proposed.
9. Safety design and measures should be in place to deal with any cumulation and evolving of hazardous gas resulting from land contamination or landfill gas migration.
10. Additional greening design should be incorporated for the aims of alleviating heat island effect and enhancing conservation values.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610200, F: 2314 2661, Email: lkcheng@greenpower.org.hk).

Yours faithfully,



CHENG Luk-ki  
Director  
Green Power