



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

26 October, 2019

Dear Ms. Cheng,

**Project Profiles for the Establishment of Marine Fish Culture Zone(FCZ) at
Wong Chuk Kok Hoi(esb324), Outer Tap Mun(esb325), Mirs Bay(esb326),
Po Toi(Southeast)(esb327)**

Green Power would like to draw your kind attention to our comments about the above-captioned Project Profiles.

1. The proposed projects involve the establishment of new FCZs for the fish farmers to operate their new fish rafts who are also responsible for the construction and anchorage of fish rafts. However, the fish farmers are not the project proponent of above-captioned Project Profiles. Therefore, the current project proponent should clarify their statutory role under the EIAO in operation phase. The identity of Environmental Permit holder(s) should be explicitly stated under EIAO in construction and operation phase.
2. Any additional structures to the fish rafts, e.g. storage and shelters for fish farmers, and activities, e.g. cooking, and associated land-based structures and activities which are not mentioned in Project Profiles should be identified for the subsequent environmental impact assessment.
3. Wastes dumped at sea are difficult to be spotted which either sink to the seabed or are drifted away with sea current and waves. Therefore, effective measures should be imposed in both construction and operation phase to avoid discard wastes illegally and inappropriately. This is particularly important for biologically non-degradable or long-terms toxic wastes such as plastics, heavy metals or persistent organic pollutants which may very likely contaminate the reared fish in the fish rafts and in surrounding marine environment and wildlife.
4. If for any reasons the fish rafts need to be relocated temporarily, e.g. unfavourable weather events and red tides, such standby locations should be identified and undergo environmental assessment to reduce and mitigate any potential impacts.
5. The potential impacts of the proposed projects on the spawning and nursery grounds of fish and other marine creatures should be carefully assessed, including their seasonal occurrence.

6. Impacts of the fish rafts and the associated use of vessels during construction and operation phase on Finless Porpoise should be assessed. Limitation of vessel type and boat speed should be imposed if necessary.
7. Cumulative environmental and ecological impact assessments should be conducted for all proposed neighbouring FCZs and the current FCZs, especially water quality, and those in vicinity of ecological sensitive areas such as Marine Park (Outer Tap Mun FCZ). Invasive fish species that aggressively feed on native vulnerable species, e.g. corals, should be prohibited.
8. Quarantine procedures, treatment of sick fish and application of additives and drugs should be taken into account of the protection of wild fish community in local marine environment against pathogen infection, and additive and drug contamination.

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