



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

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18 August, 2020

Dear Sir/Madam,

**Project Profile for
Ngau Tam Mei Water Treatment Works Extension- Feasibility Study**

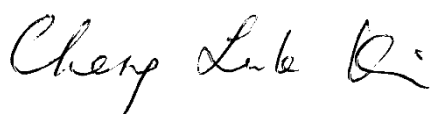
Green Power would like to draw your kind attention to our concerns about the above-captioned proposed project (the Project).

1. According to the Project Profile (PP) exhibited for public inspection, the Project comprises the following works:
 - Increase the water treatment capacity of Ngau Tam Mei Water Treatment Works (NTM WTW) including the provision of additional water treatment facilities within the existing WTW compound;
 - Construct an extension of Ngau Tam Mei Fresh Water Primary Service Reservoir (NTM FWPSR) adjacent to the existing FWPSR;
 - Lay a fresh water trunk mains for delivery of the treated water from NTM WTW to the NTM FWPSR and from the FWPSR to the existing fresh water distribution system near Tan Kwai Tsuen near Hung Shui Kiu; and
 - Modify the existing raw water tunnel junction (Chamber G) located near NTM WTW.
2. Although no site formation is required for the Project, and no surface construction nor aboveground structures (including access road and shaft) will be required for modification of Chamber G, Green Power opines that a detailed EIA should be conducted to comply with statutory requirements and most importantly avoid, mitigate and/or compensate any identified and potential environmental and ecological impacts, and safety risk.
3. NTM WTW and NTM FWPSR are both situated on the northern slope of Kai Kung Leng where the vegetation is more flourish than those on the southern slope due to less disturbance by hillfires. In view of the insufficient ecological data provided in the PP and rich vegetation in the higher altitude in the valley of Ngau Tam Mei, a more comprehensive ecological survey should be conducted in EIA, especially for mammals and birds.
4. The proposed fresh water trunk mains will be laid across some natural streams. The design of related structures should avoid disturb the stream beds and banks, and maintain their natural hydrology.

5. The watershed of Ngau Tam Mei will discharge the runoff to Ngau Tam Mei Channel which feeds Mai Po Inner Deep Bay Ramsar Site. In order to comply with the “zero discharge policy” for Deep Bay and protect the ecology of Ramsar Site, any surface runoff generated from the Project site from Ngau Tam Mei to Tan Kwai Tsuen during both construction and operation phase should be prevented from discharging into neighbouring river channels, stormwater drainage, fishponds and wetlands directly. We proposed that related mitigation measures should be incorporated into the specifications of the works contract.
6. The PP mentioned that the tunnel construction works at Chamber G may potentially induce ground water drawdown and dewatering of stream courses within the Country Park and Conservation Area. We urge that feasible and effective prevention and remedial measures should be proposed for tunnel construction to avoid and mitigate any impact upon the surface waters.
7. The amount of solid wastes, such as C & D wastes, soil and rocks, generated from the proposed project has not been mentioned in the PP. As most of the areas adjoining the project site are countryside places and fishponds, 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. Therefore, generation, transportation and disposal of such solid wastes should be under stricter control. The mitigation 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.
8. The vegetation and trees should be properly protected from any damages brought about by the proposed project against machineries, earth works, vehicles, piling of materials, etc. Burning of any materials and smoking should be prohibited in the works site of the Project to avoid destruction of habitats by fires. Damages to roots, trunks and branches of trees should be avoided by proper positioning and alignment of proposed structures and fresh water trunk mains, and observing strictly the relevant guidelines for trees protection.
9. Safety design and measures should be in place to deal with any accumulation/evolving of hazardous gas, especially in enclosed spaces in the site, and leakage to the engulfed valley of Ngau Tam Mei during both construction and operational phase.
10. Greening design should be considered to make the facilities compatible with the natural setting of Conservation Area zoning and Country Park.

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