



BY EMAIL ONLY

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16 September 2020

Dear Sirs / Mesdames,

Green Groups' Further Joint Response to Tung Chung Line Extension

1. Given the foreseeable direct and indirect impacts of the Tung Chung Line Extension Project (hereinafter referred to as “the Project”) on the unique and ecologically sensitive Tung Chung River-cum-Bay system, the undersigned groups would like to urge the project proponent to conduct prudent and comprehensive environmental impact assessment (EIA) and implement all feasible measures to avoid predictable environmental impacts. In addition to our appeals stated in a previous joint response dated 20th July, 2020, we would like to highlight the following issues for your serious consideration.

Proper design of ecological survey protocols

2. Previous EIAs (e.g. EIA-233/2015 and EIA-075/2002) and ecological studies conducted by various parties (e.g. KFBG 2013, Shin et al. 2014, Green Power's ecological surveys as stated in Wilson 2020) have clearly identified presence or potential occurrence of species of conservation concern around the project area. These include but not limited to the endemic Romer's Tree Frog (盧氏小樹蛙 *Liuixalus romeri*, "Endangered" species on the IUCN Red List), the locally uncommon dragonfly Mangrove Skimmer (斑灰蜻 *Orthetrum poecilops*, listed as "Vulnerable" on the IUCN Red List) and the Chinese Horseshoe Crab (中國鱟 *Tachypleus tridentatus*, listed as "Endangered" on the IUCN Red List), meaning there are clear target species to be covered by the EIA of the Project.
3. Given the known seasonality and probable inter-year and inter-site variation of the occurrence of these species, the ecological survey protocol adopted in the EIA of the Project should have sufficient temporal and spatial coverage to ensure representative samplings of these species are conducted. The wet season is an important period when many of these important taxa groups breed or being active. April and October, as stated in para 4.2 of EIAO Guidance Note No. 7/2010, are regarded as transitional months by ecologists and whether ecological results should largely base on surveys of these transitional months to represent the wet season is controversial.
4. Most local anurans have extended breeding period during the wet season, but it is well known that breeding activities of many amphibians are affected by rainfall and thus detectable periods of breeding adults are subjected to deviations from the known range of breeding months due to yearly variation in rainfall patterns. For instance, in years with particularly dry spring (e.g. March and April 2020 which had about 50% rainfall lower than normal figures (HKO 2020a, b), there is a high risk that species utilizing short-lived water bodies for breeding, such as the endangered Romer's Tree Frog, cannot be detected at drier locations during the transitional period of April, although those locations may become its favorable breeding sites in other times of the year.
5. The Mangrove Skimmer, with flight period known to occur between May to August (Tam et al. 2011), has the highest number of overall sightings of adults in May and July in Tung Chung according to results of monthly surveys conducted by Green Power from March to October in each of 2015, 2017 and 2018, while April was the month with lowest number of records, and with sightings in only one of the above years (Green Power, unpublished data).
6. We urge the project proponent to conduct surveys which cover the majority of the local wet season (including period from May to July) in suitable habitats, especially for the target taxa groups, with sufficient sampling effort. As future rainfall pattern is difficult to predict, surveys targeting amphibians should also be conducted within the limited time window of sufficient rainfall in September 2020. The details of the methodology adopted in the ecological surveys should also be clearly described in the EIA report as required in para 2.2. in EIAO Guidance Note No. 7/2010, and include information such as methods (e.g. transect / quadrat size and number used), locations, months, times and frequencies of sampling.
7. In case of detection of amphibians of conservation concern (e.g. Romer's Tree Frog) within the Project Area and that any translocation plan of the species is needed, the plan should be designed in conjunction and coherence with that of the Tung Chung New Town Extension (requested in section (d) of Conditions of Approval of EIA-233/2015), since individuals inhabiting Tung Chung Valley and adjacent areas highly likely belong to the same population, and should be conserved as a whole. The details of any needed translocation plan should also be described in the EIA report.

Stringent control of water quality around project site

8. Water sensitive receivers in the vicinity of the project, including Tung Chung Bay, surrounding estuaries, all stream courses, associated mangroves and mudflats, are important breeding and nursery grounds of various freshwater, intertidal and marine organisms, many of which are likely susceptible to water pollution but with exact environmental tolerances not yet known. An example of this is the Mangrove Skimmer which is mainly found in coastal habitats with freshwater input, including streams in tidal mangroves (Zhang 2019) just below the tidal limit (Wilson 2001 & 2020). The special habitat requirements of the species thus suggest it may be highly vulnerable to habitat degradation and pollution of both marine and freshwater habitats.
9. As the existing statutory water quality objectives (WQO) have not been proven to be suitable for the survival and reproduction of aquatic life, control of water quality around project sites should be enforced in more conservative manner. Monitoring of water quality parameters in water bodies nearby the construction sites before and during the construction phase is an essential control measure, and shall be conducted with thresholds specially set according to well-documented natural water quality levels at or around these water sensitive receivers before construction begins (i.e. set according to published results or data from EIA).

Compulsory application of monitoring technologies to eliminate ecological vandalistic dumping

10. Despite claims of trip-ticket system being effective in avoiding illegal dumping and landfilling of C&D materials at unauthorized sites, there have been many cases of cheating of the system. Stringent documentation, verification and monitoring for the waste disposal system must be implemented to avoid landfilling of ecologically sensitive areas.
11. Activities of all large vehicles, construction / dump trucks, barges and similar machineries related to the Project on Lantau should be closely monitored using GPS devices, or technologies / methods (e.g. visible labels of project proponent on such large vehicles) proven to be more or equally effective. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the activities of relevant contractors.

Conclusion

12. The undersigned groups would like to reiterate that the EIA process is an important tool to “avoid, minimise and control the adverse impact on the environment of designated projects” (as stated in the introduction of *A Guide to Environmental Impact Assessment Ordinance*), rather than only a set of procedures to be fulfilled with the aim of gaining granting of Environmental Permits. The process should be implemented with due diligence.
13. In view of the uniqueness and high ecological sensitivity of Tung Chung River cum Bay and associated sensitive habitats, the project proponent should adopt a comprehensive and proactive conservation plan to gather essential data to inform the decision-making process, as well as provide innovative and practical solutions to avoid any foreseeable impacts in planning stage.

Thank you very much for your kind attention. I look forward to your favorable actions to protect Tung Chung River-cum-Bay.

Yours sincerely,



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On behalf of

Eco-Education & Resources Centre
Friends of the Earth
Green Power
Hong Kong Bird Watching Society
The Conservancy Association

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