



**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](mailto:eiaocomment@epd.gov.hk))

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Dear Ms. Cheng,

**Project Profile for Road (Tai Ho – Sunny Bay Section), Lantau**

Green Power and Eco-Education & Resources Centre would like to draw your kind attention to our comments about the above-captioned Project Profile.

1. The ecological importance of Yam O Bay (also called Sunny Bay), the remaining natural coast along North Lantau Highway, may have been underestimated. In 2012, the first record of Alligator Pipefish (*Syngnathoides biaculeatus* 擬海龍) in the western Hong Kong waters was observed in the Bay according to an underwater visual census conducted by the Eco-Education & Resources Centre and Green Power<sup>1</sup>. Yam O Bay may be an existing breeding and foraging ground for the threatened pipefishes.
2. Further away from the Yam O Bay, the recipient site of a completed Coral Translocation Scheme<sup>2</sup> (as required by the Environmental Permit issued under the Hong Kong Airport third-runway project) near the Yam Tsai Wan (陰仔灣) shall also be identified as the sensitive receiver of the captioned project.
3. Although the numbers of detected Chinese White Dolphin around Brothers Island has dropped significantly in recent years, the latest monitoring report of Marine Mammals in Hong Kong Waters<sup>3</sup> has highlighted that “*the continuing night-time usage by (Chinese White) dolphins of this once-important habitat (Brothers Islands) should not be overlooked.*” Any permanent alteration of the potential habitats for dolphins, particularly the proposed sea reclamation close to the Brothers Island Marine Park, should only be considered if there is no alternative.

4. We urge the project proponent to fully assess the ecological condition in the study area, especially the population and distribution of pipefishes, corals and Chinese White Dolphin. Adaptive ecological survey methods should be adopted. In particular, the passive acoustic monitoring technique is necessary for conducting the dolphin survey.
5. Workable and proactive mitigation measures should be formulated accordingly. The Coral Translocation Plan mentioned in paragraph 2 had eventually obtained a high mortality rate of translocated corals<sup>4</sup>. It infers that translocation of important species (as suggested in the project profile Section 5.5.2) may not be a feasible mitigation option.
6. To minimize the environmental impacts on the marine habitat, the number of working vessels should be kept at a minimal during the construction phase. The working vessels should avoid encroaching and entering the Brothers Island Marine Park area and other designated and proposed Marine Parks. The speed of associated vessels should be restricted near the designated and proposed marine parks, and hot spots or foraging areas of dolphins. Effective boat speed surveillance system should be in place.
7. In order to avoid triggering uncontrollable development pressures on Lantau, especially Northeast Lantau, Tung Chung West, Tai Ho and natural coastlines, the works area of the captioned project should be clearly defined and fenced with restricted vehicular and pedestrian access. The project proponent, their contractors and subcontractors should not use any of the land areas on Lantau coast outside the works area especially Tung Chung West (i.e. areas west of Shun Tung Road, Tung Chung), Pak Mong, Ngau Kwu Long, Tai Ho, Tai Ho Wan, Yam O Wan, Yam O Tuk, Luk Keng Tsuen, Luk Keng Bay, Cheung Sok, Ha Kok Tsui, Yam Tsai Wan and undeveloped coastlines and areas on the outlying islands as works area, vehicle parking, vessel berthing, equipment storage, stock piling or other activities related to proposed works.
8. 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.
9. 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.

10. According to Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data<sup>5</sup>, Tung Chung ranked amongst the most polluting districts in terms of number of hours with AQHI  $\geq 7$  and days with daily maximum AQHI  $\geq 7$ . Proposed P1 Road is part of the trunk road network that is connected to North Lantau Highway, Tuen Mun-Chek Lap Kok Road Link, proposed Route 11, Tsing Yi-Lantau Link and possibly roads connected to reclamation in East Lantau water, the traffic flow to and from Lantau would be further increased and air pollution on Lantau, especially North Lantau, would be further deteriorated. Therefore, comprehensive cumulative air pollution impact assessment should be conducted.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, F: 2314 2661, Email: [wflo@greenpower.org.hk](mailto:wflo@greenpower.org.hk)).

For and on behalf of  
Green Power and Eco-Education & Resource Centre,



LO Wing-fung  
Assistant Senior Education & Conservation Officer  
GREEN POWER

References:

<sup>1</sup> Eco-Education & Research Centre and Green Power (2012). *A Summary of Pilot Research Searching for Pipefish in Hong Kong*.

<sup>2</sup> Airport Authority Hong Kong (2017). *Expansion of Hong Kong International Airport into a Three-Runway System — Detailed Coral Translocation Report*. Available from:

<http://env.threerunwaysystem.com/ep%20submissions/201605%20Coral%20Translocation%20Plan/201706%20Detailed%20Coral%20Translocation%20Report.pdf>

<sup>3</sup> Agriculture, Fisheries and Conservation Department (2020). *Monitoring of Marine Mammals in Hong Kong Waters (2019-20)— Final report*. Available from:

[https://www.afcd.gov.hk/english/conservation/con\\_mar/con\\_mar\\_chi/con\\_mar\\_chi\\_chi/files/Final\\_Report\\_2019\\_20.pdf](https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_chi/con_mar_chi_chi/files/Final_Report_2019_20.pdf)

<sup>4</sup> Airport Authority Hong Kong (2017). *Expansion of Hong Kong International Airport into a Three-Runway System — Construction Phase Quarterly EM&A Report No.6*. Available from:

<http://env.threerunwaysystem.com/Quarterly%20EM&A/201709%20Quarterly%20EMA%20Report%20No%206.pdf>

<sup>5</sup> Green Power (2020). *A Brief Review of AQHI Data of Hong Kong for 2019*. Available from:

[https://www.greenpower.org.hk/html5/download/concern/20200327\\_e.pdf](https://www.greenpower.org.hk/html5/download/concern/20200327_e.pdf)