



生態教育及資源中心
Eco-Education & Resources Centre

BY EMAIL ONLY

Ms. Maisie Cheng, J.P.

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

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29 June 2021

Dear Ms. Cheng,

Project Profile for Airport Tung Chung Link Project

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

Waste Disposal and Enforcement of Eco-vandalism

1. Filling of the river banks and farmlands/wetlands with wastes and/or soil debris are continually reported in Tung Chung West area. Given the proximity of the proposed project to, and high accessibility from the existing road networks to the ecologically sensitive areas, there is high risk that such activities would spread to and proliferate in these areas, including mangroves in “CPA” zones, riparian areas in “CA” zones or even those within the future River Park area, thereby destroying the natural habitats within Tung Chung River Valley *cum* Bay which are of very rare and high ecological value.
2. In order to conserve the ecology and water quality of Tung Chung River Valley *cum* Bay, the proposed works should have no association, direct or indirect, to any lands and activities in Tung Chung West, i.e. areas to the west of Chung Yan Road and its connected northern section of Tung Chung Road, where numbers of conservation works will be soon implemented under the Tung Chung New Town Extension Project, e.g. River Park.
3. C&D materials produced from the proposed project should be properly stored, transported, and finally disposed of at the designated facilities and/or environmentally treated. The fly-tipping control measures, including but not limited to the proposed trip-ticket system (Section 5.5.1), should be implemented with deterrent clauses incorporated in the works contract. However,

there have been many cases of cheating of the system. Stringent documentation, verification and monitoring for the waste disposal system (e.g. using GPS devices) must be implemented to avoid landfilling of ecologically sensitive areas.

4. In order to protect the ecosystem and natural environment of Tung Chung River Valley *cum* Bay and South Lantau from air pollution and illegal dumping, large vehicles, construction / dump trucks and similar machineries associated with the Project must be prohibited from entering the section of Tung Chung Road between Ha Ling Pei and Shek Mun Kap, and all sections of South Lantau Road, as well as Chung Mun Road. Vehicles that have justified reasons for entering need to seek formal approval from relevant authorities and be closely monitored (e.g. using GPS devices).

Aquatic biodiversity, fisheries and water quality

5. Green Power and the Eco-Education & Resources Centre conducted survey in Tung Chung Bay in 2012 and found that Tung Chung Bay is of high ecological importance for pipefish. Also, larvae of economical species, including those of families Callionymidae, Clupeidae, Engraulidae, Gobiidae, Sciaenidae, Sillaginidae, Lutjanidae, were found. The Administration's ecological and fisheries survey findings also confirm that Tung Chung Bay is an important spawning and nursery ground for sea horses and other marine life, and a rich fisheries resources site. We are highly concerned about the impacts of the construction works to the water quality and ecology of Tung Chung Bay, given the proximity of the construction sites to the sensitive ecosystem.
6. In order to avoid damage to ecology and deterioration of water quality of Tung Chung Bay and mouth of Tung Chung River, any surface runoff, sewage and effluent discharge from Project site, during both construction and operational phases should be avoided. Measures to avoid, control and minimize the suspended solid, chemicals and other pollutants generated from marine works such as construction of piers, berthing facilities and columns of marine viaducts should be strictly effectively followed and regularly monitored.
7. Monitoring of water quality in water bodies nearby the construction sites during the construction phase is an essential control measure. As the existing statutory water quality objectives (WQO) have not been proven to be suitable for the survival and reproduction of aquatic and marine life, ecological-based standards of water quality should be derived for the preservation of aquatic ecosystem of Tung Chung River, Estuary and Bay.
8. Strict compliance and enforcement of such measures are of particular importance, especially when discharge of wastewater or other pollutants from construction sites into ecologically sensitive areas are very difficult to rectify, and that dumping or stockpiling of such pollutants (e.g. C&D materials) offsite are usually difficult to monitor (see sections above).


9. The number of work vessels should be kept as minimum as possible, and the vessels should avoid entering the nearby The Brothers Marine Park to minimize disturbances.

The Vulnerable Species

10. Green Power has been conducting annual dragonfly surveys in Tung Chung Valley since 2015, and has recorded the Mangrove Skimmer (斑灰蜻 *Orthetrum poecilops*), a locally uncommon dragonfly which is listed as “Vulnerable” on the IUCN Red List, at various locations in Tung Chung Bay area around the estuaries of Tung Chung River and Wong Lung Hang Stream between 2015 – 2019.
11. We strongly urge the project proponent to conduct assessment of this species during the EIA study, and the authority to apply stringent standard and control during the issue of the EIA study brief and assessment of the subsequent EIA report.
12. Impact assessment of the ecology on Scenic Hill, especially the endemic species Romer’s Tree Frog (盧氏小樹蛙 *Liuixalus romeri*), should be covered in this project. The quoted distribution map of the frog in the Project Profile (Session 3.6.2) is not up-to-date.
13. Although the project area is not a preferred habitat of Chinese White Dolphin and Finless Porpoises, the project proponent is recommended to spend extra effort to minimize the impacts on these marine mammals. Setting up “Dolphin Exclusion Zone” as proposed in the Road P1 (Tai Ho – Sunny Bay Section) project could be a good practice.

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

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



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