BY EMAIL ONLY

Ms. TSE Siu Wa, Janice, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

21 March 2022

Dear Ms. Tse,

Project Profiles for Peng Chau Cable System & Lamma Island Cable System

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

1. Although "*no seagrass was recorded along the intertidal survey transects in this (Peng Chau Cable System) project*" (Session B.7.13), the absence of seagrass at Nim Shue Wan (i.e. known to record seagrass bed of *Halophila ovalis*) is questionable due to the following reasons:
   a) According to Figure B.4, the intertidal survey transects only cover the sandy shore of the Nim Shue Wan which is unfavorable habitat for the seagrass *H. ovalis*[1]. Instead, seagrass *H. ovalis* likely colonizes at the mudflat further away from the sandy beach.
   b) The intertidal surveys were conducted in September 2020 and November 2020 (Session B.4.6) which were right after Typhoon Higos (Signals no.9 on 19 August 2020) and Typhoon Nangka (Signals no.8 on 13 October 2020) respectively[2]. It is possible that the seagrass bed at the project site had disappeared after the typhoons but not yet had sufficient time to recover before the surveys. In Wong's study[1], the seagrass *H. ovalis* in another site of Lantau took about eight months to recover after a typhoon.

   Since seagrass has special ecological and scientific value, we urge the project proponent to conduct a comprehensive seagrass survey at the mudflat areas before typhoon season to investigate the up-to-date distribution of seagrass, if any, at the project site. There is another EIA for reference in which standard quadrat-based seagrass surveys were conducted at the high potential locations within 500m of the project site throughout eight months from August to March[3].

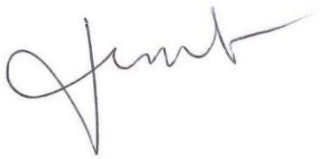
2. The alignment of the cable should avoid any ecological sensitive receivers such as seagrass bed and coral communities as far as possible. The reason for not considering the alternative landing site at Cheung Sha Lan (i.e. "*additional construction of a terrestrial connection will be required*" (Session B.1.5.2)) is not justified from an environmental perspective because picking this alternative site can at least minimize the direct impact on a coral community and likely reduce the length of the shore-end cable.

3. The suspended solids elevated from the proposed cable laying works can travel up to 180m in a worst-case tidal current scenario (Session A.5.12). Given that the corals and seagrasses are vulnerable to sedimentation, we recommend the project proponent using the silt curtain during the route clearance, cable burial, and repair works in order to minimize the spread of suspended solids.

4. Waste or by-products (e.g. old cables and debris) should be properly stored, transported, and finally disposed of at the designated facilities. The project proponent shall consider installing prompt surveillance systems on the vessels to monitor any illegal dumping at sea activity.

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).

Yours sincerely



LO Wing-fung
Senior Education & Conservation Officer
Green Power

Reference:

[1] Wong Pak Leung (2018) An assessment of seasonal abundance of *Halophila ovalis* (R. Brown) Hooker f. and potential for conservation in Hong Kong. The University of Hong Kong.

[2] Hong Kong Observatory (2021) Tropical Cyclones in 2020. Available from: www.hko.gov.hk/en/publica/tc/files/TC2020.pdf

[3] Civil Engineering and Development Department (2020) Pier Improvement at Lai Chi Wo Environmental Impact Assessment Report (AEIAR-225/2020). Available from: https://www.epd.gov.hk/eia/english/alpha/aspd_728.html