



**BY EMAIL ONLY**

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**Director of Environmental Protection**  
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Environmental Protection Department  
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15 June 2022

Dear Ms. Tse,

**EIA report for Tuen Mun South Extension**

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

1. Although the Water Quality Index (WQI) obtained from the water quality monitoring stations at the downstream of Tuen Mun River (i.e. Station TN3, TN4, TN5, and TN6) was graded “Good” or above from 2016 to 2020<sup>1</sup>, there is a trend of degrading in WQI among all these stations. In particular, the level of suspended solids reached the highest value in 2020 (Table 1). The project proponent should strictly execute the proposed mitigation measures (Section 5.8) to minimize the adverse water quality impact induced by the project.

Year	Level of suspended solids (mg/L)			
	TN3	TN4	TN5	TN6
2016	4.0	5.0	5.0	3.0
2017	5.7	6.3	6.0	5.8
2018	6.5	6.6	6.4	5.6
2019	5.1	4.9	5.2	4.1
2020	8.3	9.9	8.0	6.7

Table 1. Level of suspended solids at three water quality monitoring stations at Tuen Mun River from 2016-2020

(Sources: EPD’s River Water Quality in Hong Kong from 2016 to 2020)

2. Temporary stockpiling sites for the C&D materials and chemical wastes (Section 6.4.6) should be set up away from the Tuen Mun River Channel and other ecologically sensitive areas. The wastes should also be properly stored and finally disposed of at the designated disposal sites. Trip-ticket system and real-time GPS tracking device could be applied to combat illegal dumping activities.
3. Night-time construction works that will disturb the nearby Ardeid night roosting site should be avoided as far as practicable especially in the dry season to minimize excessive disturbances. Otherwise, noise and light barriers should be provided to conceal the working areas.

4. Given that two-third of breeding Little Egret were recorded flying towards the project site from the Tuen Mun Egretty (Section 8.5.16), the Tuen Mun River Channel (i.e. the watercourse inside the project site) is potentially one of the major foraging grounds to support the Egretty. It is worth concerned that the number of active nests of Little Egret in the Tuen Mun Egretty in the past few years have emerged a decreasing trend<sup>2</sup> (Table 2). Hence, the project proponent should consider avoiding construction works in the watercourse during the peak Ardeid breeding period (i.e. April to June) in order not to further disturb their breeding activity.

Year	No. of active nests
2016	30
2017	17
2018	20
2019	14
2020	9
2021	12

Table 2. Number of active nests of Little Egret in the Tuen Mun Egretty in the past few years (Sources: HKBWS's Egretty Counts in Hong Kong from 2016 to 2021)

5. Shade-tolerant plants to be planted under the viaduct (Section 8.9.9) and the vegetation utilizing for enhancing the overall greening along the Tuen Mun River (Section 8.9.15) should be native species that are adaptive to the brackish watercourse habitat and compatible with the environment.

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](mailto:wflo@greenpower.org.hk)).

Yours faithfully,



LO Wing-fung  
Senior Education & Conservation Officer  
Green Power

#### References:

<sup>1</sup> Environmental Protection Department [EPD] (2020) *River Water Quality in Hong Kong in 2020*. Available from:

<https://www.epd.gov.hk/epd/sites/default/files/epd/english/environmentinhk/water/hkwqrc/files/waterquality/annual-report/riverreport2020.pdf>

<sup>2</sup> Hong Kong Bird Watching Society [HKBWS] (2021) *Egretty Counts in Hong Kong 2021*.

Available from:

<https://cms.hkbws.org.hk/cms/en/component/phocadownload/file/812-egretty-summer-report-2021>