

**By Fax and Post**

19 January 2005

Our ref: SHK/LAW 2/19JAN05

Dr. Sarah Liao  
Secretary for Environment, Transport and Works  
10/F, Citibank Tower  
3 Garden Road  
Central  
Hong Kong

Dear Dr. Liao

**Chief Executive's 2005 Policy Address**

WWF Hong Kong has read with great interest the environmental initiatives set down in the Chief Executive's Policy Address. We wish to offer our comments and to seek clarification on some aspects.

**Harbour Area Treatment Scheme (HATS)**

We are encouraged to learn of the commitment to ensure all harbour-area sewage will receive treatment by year 2013. However, we are disturbed to see that there is no commitment regarding the level of treatment. Although there is a reference to building the facilities in "phases", there is no specification what level of treatment will be implemented by 2013. The timetable described in the recent HATS consultation document, leads us to surmise that the government has decided to proceed with chemical treatment plus disinfection only. As the HATS consultation has only recently been completed and we understand that the government is currently collating comments received from the public. We question how this decision has been made, without any presentation to the community or the Legislative Council of the detailed results of the consultation exercise, or feasible options for taking the scheme forward. We urge the HKSAR Government to clarify its intentions at the earliest possible date. We would also like to take this opportunity to repeat our position that biological treatment should be provided as soon as possible with a firm time frame.

**Covering of Nullahs**

We note with interest the proposal to cover some 16 sections of nullahs to eliminate nuisance

to local residents. We presume that this refers to the need to make sure residents are not exposed to the sight and smell of polluted nullahs.

We find this proposal quite bizarre as it implies that the HKSAR Government is not solving the root cause of the problem but is only addressing the symptoms. Surely the most effective means of removing this source of nuisance would be to make sure the pollution does not enter the nullahs in the first place!

WWF Hong Kong is concerned that this cosmetic proposal will simply exacerbate Hong Kong's pollution problems. Failure to deal with the pollution at the source will lead to more illegal discharges which will mean, ultimately, more pollution entering the sea from storm drains. In connection with this proposal therefore we would be most grateful if you would provide us with relevant information concerning the following:

1. Has any analysis been conducted of the relative costs and benefits of covering up the pollution compared to dealing with it? If so, may we have a copy of such analysis?
2. How much pollution is entering the nullahs which are selected for covering up? How does this compare with say, the amount of sewage generated from houses in the New Territories which are not connected to public sewerage system?
3. What is the total cost of the proposal to cover all 16 nullah sections?
4. How much money was spent in the 2004/5 financial year on connecting previously unconnected sewage flows to the public sewerage network in (a) urban Hong Kong and Kowloon and (b) the New Territories?
5. How much money was disbursed as payments to livestock farmers who opted to cease business under the "livestock waste control scheme", and how much pollution was removed as a result?
6. How much pollution from livestock farms still enters the New Territories' rivers?

We are confident that with the answers to these questions, our community will better able to form a considered view on whether the cost of covering these nullahs might be better spent dealing with more fundamental pollution problem.

### **Nature Conservation Policy**

We are pleased to see a commitment to address ecologically important habitats on private land and to conserve fishery resources in Hong Kong waters. However, we are very disappointed that there are too few new initiatives devoted to nature conservation and that there is no further discussion about the development a comprehensive conservation policy.

### **The future of Lantau**

We are gravely concerned about the conflicts between development and conservation on Lantau while the island is being described as to "provide fresh impetus for Hong Kong economic development". Although the Concept Plans for Lantau aims to provide an overall planning framework to ensure a balanced and coordinated approach for the proposed developments, a number of significant development plans, such as the proposed development of Container Terminal 10 on Northwest Lantau and Liquified Natural Gas Terminal on the south of Lantau, are excluded from the consultation process. The Government should set up

clear and comprehensive conservation objectives for Lantau and employ a holistic planning approach such that the nature conservation needs of Lantau will not be compromised by the cumulative impacts of development.

Yours sincerely,

Eric Bohm  
CEO  
WWF Hong Kong

cc. Director of Agriculture, Fisheries and Conservation  
Chairman, EA Panel of LegCo  
Chairman, ACE  
Director of Drainage Services  
Director of Environmental Protection