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Legislative Council Panel on Development

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WWF's response to the Government's strategy to enhance land supply through reclamation outside Victoria Harbour and rock cavern development

I. Our Sea Should be Treasured, Not Filled in to Create a Land Reserve or to Dispose of Waste

- The sea is an important and precious resource, and should be carefully managed to conserve biodiversity, and support fisheries, recreation, and a high quality of life. A healthy sea provides a wealth of benefits to Hong Kong communities. WWF objects to the proposition of reclaiming the sea in order to build land reserves before fully exhausting other options, such as optimising redevelopment of old urban areas and better use of land resources. Before using reclamation to provide land supply, there should be well-defined purposes and land-use planning, following the approaches of planning studies¹ by the Planning Department in recent years.
- The Government suggests a mix of land supply options, including rezoning land, redevelopment, land resumption, reclamation, rock cavern development and reuse of ex-quarry sites, to provide flexible land supply for Hong Kong. ***Out of these six land supply options, WWF considers reclamation should only be carried out as a last resort, as it is incredibly damaging to the marine environment and is also irreversible.*** For all land supply options, the Government should also ensure the potential environmental impacts being properly addressed.
- The Government has highlighted three benefits of reclamation, namely creating land, handling public fill, and disposing of contaminated sediment. WWF challenges the Government's intention to use our sea as a disposal site. Rather than addressing the issue of construction and demolition (C&D) materials in a piecemeal matter, the government should formulate a holistic policy to manage C&D materials with clear objectives in promoting reduction and reuse. Ironically, the Government has also stated that it has to maintain local supply of rock products

¹ Examples include the three proposed New Development Areas in Kwu Tung North, Fanling North and Ping Che/Ta Kwu Ling, and Land Use Planning for the Closed Area.

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for reclamation by developing new quarries². As such, WWF considers that the potential environmental and social concerns of the development of new quarries in Hong Kong should also be included in this consultation exercise.

II. Reclamation is Irreversible and Destructive to the Environment

- Reclamation will lead to permanent loss of marine habitats and fishing grounds, and potentially eradicating breeding, nursery and foraging grounds of marine life. For instance, the proposed reclamation site between Po Toi and Beaufort Island is an important area for corals, supporting more than 30 species of soft corals, gorgonians and black corals, while Tolo Harbour is an important fish spawning and nursery ground identified by Agriculture, Fisheries and Conservation Department.
- Reclamation may also intensify disturbance to threatened species. For example, marine traffic has been identified as a potential threat to marine mammals³, such as Chinese white dolphin and finless porpoise, as well as to sea turtles⁴. Modification of the coastline may also affect hydrology, coastal morphology, scenery, and water quality to the neighbouring areas, causing further negative impacts to the environment.
- WWF considers reclamation should be avoided in areas of high ecological value, such as habitats for coral, Chinese white dolphin, finless porpoise, mangrove and seagrass; intertidal mudflats and estuaries, as well as important breeding, nursery or foraging grounds for fisheries, horseshoe crabs, birds and green turtles. Areas with natural coastline should also be avoided.
- Major reclamation works should be supported by comprehensive planning and strategic environmental assessment to address cumulative impacts from multiple developments and to avoid incompatible uses. However, the proposed site for large scale reclamation at Siu Ho Wan, for instance, is located near the proposed Marine Park in the Brothers Island that forms part of the Approval Conditions of the Environmental Impact Assessments associated with the Hong Kong-Zhuhai-Macao Bridge. In addition, the proposed reclamation at South Cheung Chau, on the other hand, is in close proximity to the proposed incinerator at Shek Kwu Chau. These examples suggest that the Government needs better strategic planning to avoid future environmental and social conflicts.

² Paper CB(1)2205/10-11(05). Legislative Council Panel on Development: Increasing Land Supply by Reclamation and Rock Cavern Development. <http://www.legco.gov.hk/yr10-11/english/panels/dev/papers/dev0524cb1-2205-5-e.pdf>

³ AFCD (2011) Monitoring of Marine Mammals in Hong Kong Waters – Data Collection (2010-11): Final Report (1 April 2010 to 31 March 2011).

⁴ Hazel J, Lawler IR, Marsh H, Robson S (2007) Vessel speed increases collision risk for the green turtle *Chelonia mydas*. *Endangered Species Research* 3: 105-113

III. Undermining the Benefits from Upcoming Trawl Ban

- With the honourable support from the Legislative Council, Hong Kong has passed legislation to ban all trawling in the entire Hong Kong waters to rebuild our devastated marine ecosystem and to establish a sustainable fishery. A very recent study by fisheries experts at the University of British Columbia and commissioned by WWF estimates that the loss of fish catches from the airport third runway reclamations, of a size around 650 hectares, will cause 31 fishers to lose their jobs. It is not just the livelihoods of fishing community will be affected, reclamation will also impose negative impacts on marine eco-tourism and other sustainable uses of the sea. Reclamation will not only undermine the social and ecological benefits that will result from the trawling ban, but will also offset the conservation outcomes from the recovering marine ecosystem and fishery resources.
- Since the livelihoods of fishing communities and the fisheries resources are directly affected by reclamation, WWF considers fisheries impacts should be regarded as a standalone site selection criterion for reclamation consultation.

IV. Mainstreaming Biodiversity & Sustainable Development (SD)

- The Convention on Biological Diversity has already extended to Hong Kong in 2011. The Aichi Biodiversity Targets in the 2011-2020 Strategic Plan under the Convention have set a clear goal to address the underlying causes of biodiversity loss, by mainstreaming biodiversity across government and society (Strategic Goal A)⁵. Therefore, the Hong Kong Government has an obligation to integrate biodiversity values into developments and planning processes.
- In 2011, the UK Government has adopted the approach of mainstreaming sustainable development (SD) which in broad terms consists of providing Ministerial leadership and oversight, leading by example, embedding SD into policy, and transparent and independent scrutiny⁶. For instance, the Environment Secretary will sit on the key domestic policy committees, including the Economic Affairs Committee, to enforce the Government's commitment to sustainability in policy making. The Department for Environment, Food and Rural Affairs will also take the lead responsibility for reviewing departmental business plans in relation to SD principles. The Minister for Government Policy will then hold departments to account through the quarterly business plan review.

⁵ Convention on Biological Biodiversity. Strategic Plan for Biodiversity 2011-2020. <http://www.cbd.int/sp/targets/>

⁶ Mainstreaming Sustainable Development, the Coalition Government's vision for sustainable development. <http://sd.defra.gov.uk/gov/vision/>

- Hong Kong, however, is currently lacking of a holistic policy framework on sustainable development and biodiversity conservation. Government should make reference to the best practice overseas for formulating clear and measurable sustainable development and conservation policy targets, as well as integrating and implementing such cross-bureau policies leaded by the top-ranked official. WWF considers Hong Kong should devise a long-term Vision for sustainable development to ensure our economic growth supports protecting and enhancing the environmental resources that underpin it⁶ and that the Government should initiate a process for the Hong Kong people to be involved.
- Certain tools can be used to support sustainable development. For instance, a comprehensive Strategic Environmental Assessment (SEA) should be conducted to assess the cumulative impacts from all the projects in the vicinity of the reclamation areas. In addition, assessing the environmental and social cost for major infrastructures, including large-scale reclamations, can help decision makers and the public to see the bigger picture of such projects, and thus evaluate them against a SD agenda.

Yours sincerely,



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