

**Chairman and Members of Panel on Development, Legislative Council**

(c/o Clerk to Panel on Environmental Affairs)

Legislative Council Complex,

1 Legislative Council Road, Central, Hong Kong

16 January 2020

(By post and e-mail)

Dear Sir/Madam,

Re: Panel on Development Meeting on 20 January 2020, agenda item #III “PWP Item No. 767CL - Planning and engineering study for Lung Kwu Tan reclamation and the re-planning of Tuen Mun West Area”

We understand the above captioned will be discussed during the meeting of the Panel on Development on 20 January 2020. WWF-Hong Kong (WWF) objects to the proposed reclamation and reaffirms our position that reclamation should be the last resort. We call on the government to implement coastal and marine spatial planning prior to any development or reclamation plan.

Due to marine infrastructure projects and development pressure, the number of Chinese white dolphins has plummeted more than 80% over the past 15 years. According to the 2018/19 annual Marine Mammal Monitoring Report by the Agriculture, Fisheries and Conservation Department (AFCD), the population of Chinese white dolphins in Hong Kong waters has dropped drastically, to a historic low of 32 individuals, a decline of 30% compared to data released in 2018. The survey also indicates that only 16 dolphin calves were spotted, which is the lowest since 2003, implying an ongoing decline in reproduction.

Lung Kwu Tan is one of the limited remaining habitats of the Chinese white dolphin in Hong Kong waters. Together with the on-going third runway project and proposed developments in the nearby Chinese waters, the proposed reclamation will have cumulative impacts on dolphins, including water pollution, noise pollution, loss of fish for food, impact from increased marine traffic and habitat reduction. The natural coastline of Lung Kwu Tan is a breeding ground for many marine species. The proposed reclamation area is close to the Sha Chau and Lung Kwu Chau Marine Park, which was designated to safeguard the threatened dolphins. The impact of the reclamation will reduce the effectiveness of this marine park. Destroying these natural habitats will also reduce fishery resources, critical as food supply for the dolphins. If the reclamation

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project in Lung Kwu Tan goes ahead, the dolphins will be forced into the unprotected area of Urmston Road, which is frequented by marine traffic, including seagoing vessels, river trade vessels and speed boats. Clearly, this will vastly increase the risk of ship strikes and underwater noise pollution.

Currently the Hong Kong government has no planning mechanism to provide strategic direction for utilising the marine resources. This situation inevitably results in conflicts, not only between development and conservation, but more widely between industries and other ocean users. WWF urges the government to make reference to the land planning, and immediately implement a planning exercise for proper usage of our sea, in line with the processes occurring in the rest of the Greater Bay Area within Guangdong. This should involve a three-year baseline assessment of coastal and marine environments, to better define suitable areas for conservation protection and those appropriate for development use. Marine spatial planning is a robust, accountable and widely accepted public process that helps analyse and allocate the spatial and temporal distribution of human activities in the most appropriate way to minimise conflicts and find synergies among sectors. Economic benefits have been shown to include reduced transaction costs, improved certainty and predictability for government and private investment, and enhanced attractiveness of coastal regions.

Our sea is an important and precious resource, and should be carefully managed to conserve biodiversity, support fisheries, businesses, recreation, and a high quality of life. A healthy sea provides a wealth of benefits to Hong Kong communities. WWF continues to object any reclamation without a proper coastal and marine spatial planning.

Yours faithfully,



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c.c. Secretary for the Environment, Wong Kam-sing, GBS, JP