



世界自然基金會
香港分會

WWF-Hong Kong

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Chairman and Members of Finance Committee, Legislative Council
(c/o Clerk to Finance Committee)
Legislative Council Complex,
1 Legislative Council Road, Central, Hong Kong

19 November 2020
(By post and e-mail)

Dear Sir/Madam,

**Re: Finance Committee Meeting on 20 November 2020, agenda item
#VII “768CL Studies related to artificial islands in the Central Waters”**

WWF-Hong Kong (WWF) objects to the proposed reclamation and reaffirms our position that reclamation is no way to treat our earth and ocean. We need a vision for Lantau’s tomorrow that preserves the natural wealth of Lantau today, for future generations. Unbalanced development can profoundly alter the natural environment and degrade its value as a recreation, ecotourism, and rural living hotspot, as well as a refugia for many threatened wildlife and plant species of Hong Kong. For these reasons, we argue that minimal or no development may be most beneficial for future generations. Three alternative solutions are at hand:

1. Develop brownfields for housing rather than pursue reclamation

Hong Kong has extensive brownfields which should be rehabilitated and developed for the same purposes, with similar benefits for economic development but at much lower cost than reclamation to the Hong Kong taxpayers. The Planning Department has published a brownfield study last year, with a conclusion that there are 7,373 active brownfield sites covering 1,414 hectares in the New Territories. Earlier this year, 8 clusters of brownfield sites, totalling 36 hectares, have been identified by the Government as possible areas for the development of more than 20,000 units of public housing. However, data released by the Liber Research Community in 2018 has shown that 723 hectares of sizeable brownfield areas are available for public housing development that can potentially provide 84,000 residential units. The government

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should explore options using feasible brownfield sites to increase housing, instead of reclamation that will damage valuable natural resources and preclude sustainable growth options in the future.

2. Fix the loopholes in South Lantau ordinance's that permit unregulated filling in and destruction of wetlands and coastal forests

The rapid loss and degradation of Lantau Island's coastal lowland wetlands, streams, and riparian and coastal forests must be stopped if the coast's natural values are to be maintained into the future. The Government must confer adequate protections to vulnerable natural habitats and implement environmentally balanced land use zoning and effective enforcement. Currently, loopholes in the Town Planning Ordinance and Waste Disposal Ordinance allow for filling in of wetlands and clearing of woodlands in the conservation-related zones. These actions threaten native species and rare habitats and will increase the risk of flooding to settled areas and recreation zones. South Lantau should embrace the Ridge to Rocky Reef approach to managing its watersheds, whereby functionally important natural habitats along the coast and streams are well protected to enable them to help sustain healthy ecosystems and retain high quality natural environments for recreation, rural living, and fisheries. This also follows the government's overarching principle "Development in the North, Conservation for the South".

3. Establish a conservation area for dolphins along the southern and southwestern coast of Lantau.

The coastal marine environments of Lantau Island require enhanced protection. These coastal waters have been identified as one of the few remaining critical habitats for the endangered Chinese white dolphin according to the [2020 Emergency Action Plan](#). Frequent marine traffic along shipping lanes off southern Lantau has been found to increase the risk of ship strike and underwater noise disturbance to local cetaceans. A development-free Dolphin Conservation Management Area should be designated by 2024 to protect critical dolphin feeding and socialising habitats in southern and southwest Lantau, and to better regulate coastal development, boat traffic, fishing, and other human activities for the recovery of the dwindling dolphin population throughout the Pearl River Delta.

Lantau Today is our natural treasure with inestimable value, which will only decline if the planned reclamation proceeds and the loss of natural coastline continues at its current rapid pace. Protecting the natural wealth of Lantau Island today will also help Hong Kong fulfil its commitment to its Biodiversity Strategy and Action Plan (BSAP) and the Convention on Biological Diversity (CBD) which will be hosted in Kunming next year. It's time for the government to take finding the balance between development and conservation seriously, by protecting Hong Kong's natural landscapes and seascapes in building a New Normal for the city during the green recovery from COVID.

Yours faithfully,



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c.c. Secretary for the Environment, Wong Kam Sing, GBS, JP
Secretary for Development, Wong Wai Lun, Michael, JP