

LETTERHEAD OF World Wide Fund For Nature Hong Kong

The Chairman
LegCo Panel on Environmental Affairs
Legislative Council Building
8 Jackson Road
Central
Hong Kong

By Fax & By Post

25 September 1998

(Attention: Miss Odelia Leung)

Dear Miss Leung,

**Phase I of Environmental Impact Assessment for Stage II
of the Strategic Sewage Disposal Scheme**

Thank you very much for your letter of 18 September 1998 to our Ms Alex Yau regarding the above captioned.

WWF HK wish to submit our comments for the meeting which will be held on 5 October 1998 regarding the captioned project, but I regret to inform you that we will be unable to attend the meeting at the proposed date.

WWF HK is very pleased to know that Government has planned to clean the harbour by means of the Strategic Sewage Disposal Scheme (SSDS), which aims to collect all the sewage produced to one point and have a contralised treatment system before discharging into the sea.

It was proposed in the recent report 'SSDS-EIA: Study briefing document and option evaluation and comparison', that there are several potential options with different treatment levels (e.g. CEPT, secondary, tertiary) of sewage and various outfall locations (e.g. E or W Lamma, and SE Lamma into the Lema Channel).

According to the feasibility studies for the SSDS, it is estimated that primary treatment could only remove 30% of all contaminant from the sewage, chemically-enhanced primary treatment (CEPT) 60% and secondary treatment up to 90%. WWF HK would like to urge for a higher level of treatment which is not only needed to achieve the Water Quality Objectives (WQO) but also to ensure the quality of the water bodies is maintained in good condition.

We are very pleased to note that in the report it was concluded that '*discharges of SSDS effluent without disinfection were assessed to be unacceptable...*'. Up to 99.9% of bacteria can be removed from effluent treated with disinfection, which will greatly relieve the negative impacts to the existing marine mammals such as the Chinese White Dolphins and the Finless Porpoises in the region. WWF HK strongly supports the proposed sewage treatment option such that all discharge from the SSDS stage II should be disinfected to remove 99.9% of bacteria.

In addition we would like to see the Government employing a charge as deterrent for sewage production through the implementation of the Polluter Pays Principle (PPP). We support such scheme as only through such would people have to bear a fair share of responsibility towards the environment.

In regard to the outfall locations proposed in the report, we do have reservations in particular on the proposed outfalls B and C (i.e. E or W Lamma outfall) as they are areas frequently used by the finless porpoises (according to a recent WWF research study). Not only with the direct effluent discharge, but the construction of the underwater tunnels, subsequent increased marine traffic, and noise impacts will also further impose threats to these animals. Moreover the areas have also been identified as a potential Marine Park. However, we feel that discharging effluent to the Mainland waters is irresponsible. Besides, the South China Sea is cleaner than the waters in Victoria Harbour, and both soft and hard gorgonian corals are found in the Dangan Sea. In any case a higher treatment level of sewage (such as secondary level) would be desirable; but the final option must be carefully evaluated and could not be decided until a full EIA is conducted.

Thank you very much for your attention.

Yours faithfully,

Carmen Lee
Conservation Officer