



世界自然 (香港) 基金會  
World Wide Fund For Nature Hong Kong

香港中環觀中環安號  
電話：(852) 2526 1011  
圖文傳真：(852) 2845 2734  
電子郵件：wwf@wwf.org.hk  
網址：http://www.wwf.org.hk

No. 1 Tramway Path  
Central, Hong Kong  
Telephone: (852) 2526 1011  
Telefax: (852) 2845 2734  
E-mail: wwf@wwf.org.hk  
World Wide Web: http://www.wwf.org.hk

**ENVIRONMENTAL IMPACT ASSESSMENT**

***Construction of an International Theme Park in Penny's Bay of North Lantau and its Essential Associated Infrastructures***

Comments of WWF Hong Kong submitted to  
the Environmental Affairs Panel of the Legislative Council  
*April 2000*

1. WWF Hong Kong reviewed the EIA report for the construction of an international theme park at Penny's Bay of North Lantau and its essential associated infrastructures, with particular focus on the ecological assessment.
2. WWF Hong Kong concludes that the ecological assessment has underestimated the possible impacts of the construction works on the ecological sensitive receivers, and consequently led to inadequate mitigation measures being proposed. The effectiveness of many of the proposed mitigations have yet to be substantiated, and hence contrary to what's been claimed in the EIA reports, there are residual ecological impacts.
3. WWF Hong Kong recommends further mitigations, especially in the following aspects:
  - 3.1 Marine Ecology
    - i. Submission and review of an EIA for the identified marine borrow area (East Lamma) *prior* to commencement of reclamation;
    - ii. Use of drained method for reclamation (instead of dredged method) – drained reclamation takes longer but does not require dredging of contaminated bottom sediments;
    - iii. Designation of artificial reefs (ARs) deployment areas as Marine Parks and/or no-fishing zones (otherwise uncontrolled fishing over ARs may aggravate overfishing as fish aggregate among ARs);
    - iv. Longer term post-construction monitoring of sloping seawall for hard coral establishment, and in case of non-establishment of corals undertake additional mitigations and/or translocation of coral polyps;
    - v. As a precautionary measure, designate other Chinese White Dolphin habitats (such as Fan Lau, southwest Lantau, and northeast Lantau) as Marine Parks;
  - 3.2 Terrestrial Ecology
    - i. Long term post-establishment monitoring of transplanted vegetation and mitigation planting, plus designation of these areas as Country Parks, with effective fire breaks, to ensure long term survival of the vegetation;
    - ii. Protection, either through land use zoning, or preferably by designation/extension of Country Parks, of White-bellied Sea Eagle nesting habitats, such as Sunshine Island and Green Island;
    - iii. Re-routing of access trails to the lookout area in Tsing Chau Tsai to avoid impacting the Mong Tung Hang Stream which provides habitats to the locally

贊助人：何廣生先生  
會長：關榮升先生  
副會長：鍾建輝先生  
主席：陳成煥先生  
副：石華如女士  
義務核數師：方中會計師行  
義務公司秘書：合眾秘書服務有限公司  
義務律師：村上打律師行  
義務司庫：渣打銀行  
註冊慈善機構

Patron: The Chief Executive the Honorable HUNG Ho-qua  
President: Sir Kenneth P. F. Fung  
Vice-President: Sir David Akers-Jones  
The Honorable Donald Leung JP  
Chairman: Mr. Hans Michael Jebben  
Executive Director: Ms. Waiwo W. Y. Sok

Honorary Auditors: Moores Rowland  
Honorary Company Secretary:  
United Secretaries Limited  
Honorary Solicitors: Johnson Stokes & Malles  
Honorary Treasurer: HSBC Ltd  
Registered Charity

rare Rice Fish. A buffer distance of at least 100 m on either side should be adopted;

4. WWF Hong Kong finds the subject study's cumulative impact assessment to be inadequate. In particular, there is little discussion of the possible impacts resulting from other adjoining developments catalysed by the theme park. To safeguard the remaining areas of ecological significance and high landscape/visual value, especially in south Lantau, the Administration should delineate South Lantau as "no-go" area, and expedite the provision of public sewage treatment facilities or connection to the villages there.