

Comments of the Green Lantau Association on the proposed International Theme Park

Ladies and Gentlemen, Honourable Members:

We are deeply disappointed at the Environmental Impact Assessment for this project. As there is not enough time to go into every reason, I'll try to cover the highlights:

First, the EIA is written in a misleading and biased manner. The page-and-a-half list of so-called "environmental benefits" are for the most part not benefits at all, but mitigation measures. The disbenefits are compressed into single-space, unelaborated, and described as "potential", when the EIA itself spells out the extent that these disbenefits are in fact guaranteed. A casual glance at the two lists may give you the impression that benefits outweigh the disbenefits, when in fact this is not the case.

If you only have time to read the conclusions, you will also be misled, as the conclusions often deviate remarkably from the analysis. For example, the impacts on the marine ecology will be enormous. Healthy hard coral populations of high ecological value will be wiped out, yet this is considered "acceptable". Noise levels in the Country Park Extension will exceed 65 decibels, yet there is no mitigation planned. Visual impacts, cleverly hidden in an appendix where you're not likely to look at it, are also summed up as "acceptable", when in fact they are horrific.

Many of the conclusions are based on spurious assumptions or insufficient research. In assessing the cumulative impact on the Indopacific humpback dolphins of the loss of natural shoreline, the consultants say "due to the fact that humpback dolphins do not appear to be highly concentrated near shorelines in Hong Kong's inshore waters, the loss of natural shorelines will not have a significant impact". I personally have been on around 300 dolphinwatching trips in Hong Kong. While I admit I'm not a scientist, I have what you might call a fisherman's knowledge of dolphins. I would say from personal experience that dolphins do indeed concentrate near shorelines.

Second, the EIA illustrates a cavalier approach both to the spirit of the Environmental Impact Assessment Ordinance and to government policy. Stage I of the reclamation will be dredged, meaning tonnes of contaminated mud will be brought up through the water column in Penny's Bay and dropped through the water column again in East Sha Chau, disrupting the benthic community and polluting the water in both locales. This is against government policy, which stipulates the slower but more environmentally friendly drained reclamation process. We are riding roughshod over government policy to shave a few years off a process that will take many many years anyway. Our only excuse appears to be "we want it really badly".

The case of the White-Bellied Sea Eagle makes a mockery of the whole process. We have a breeding pair of an locally rare species, and the construction process will obviously disturb it. Notwithstanding the assurances in the EIA that the construction will be so many metres from the nest, and the nest will be protected with a fence, the

pick itself up and find another home somewhere nearby.

Third, this EIA, thick as it is, is woefully short on details. Some of the many questions it raises but does not answer: Where will the marine sand come from, and with what environmental impact? Where will the Penny's Bay rail link start? What facilities will be there? How will the Siu Ho Wan sewage treatment plant cope with the additional loading, which it was not designed for? What backup systems will be available in the event of pumping failure? Who or what department will carry out the compensation planting at Ngong Shue Au? When will this take place? What measures will be taken to ensure that these plantings will not be burnt up like the airport compensation plantings?

These are but some of the many doubts and questions we have regarding this project. There are many more. But lastly, and more importantly, we doubt that this EIA will have any relation to reality when the bulldozers move in.

As an example: Civil Engineering Department are in charge of deploying the artificial reefs that are supposedly compensation for the destroyed fish spawning ground. Putting aside the fact that there is no proof that ARs improve the fish stocks, CED has a very poor record of implementing EIA recommendations. At its Kau Shat Wan Explosives Complex, also in East Lantau, CED has failed for the past five years to mitigate the visual impact of shotcrete walls and ancillary buildings even though these impacts had been designed to be mitigated in the EIA. CED failed to respond to letters from GLA on this matter, and also did not act on a compromise mitigation proposal subsequently put forward by EPD.

The EIA says that vegetation such as pitcher plants will be protected, as will mountain streams. During construction of the North Lantau Expressway, pitcher plants outside the works area were bulldozed. When we pointed this out, surviving pitcher plants were transplanted to an unsuitable location, where they died. Again during the NLE construction, mountain streams offsite were treated as free water sources, in violation of EIA recommendations and often at cost to the streams and surrounding vegetation.

Given our long experience studying EIAs and monitoring the implementation of their recommendations, GLA has no confidence that even the provisions of this inadequate EIA will be realized.