

**Letter head of The Conservancy Association**

Date:20/12/1999

**Submission To Legco Panel on Environmental Affairs on Review of the  
Strategic Sewage Disposal Scheme**

The Conservancy Association appreciates the initiative to conduct a review of the Strategic Sewage Disposal Scheme. In the past years The Conservancy Association has conveyed to Government on various occasions our doubts on the viability and cost-effectiveness of the SSDS and made a number of suggestions for improvement. In the government machinery, officials found it difficult to address our concerns since SSDS was at that time a set government policy and therefore the room for change was very limited.

We hope that the proposed review will allow the scheme to be looked at from a fresh perspective from the top without the burden of past policy making. With this in mind, we would like to make the following suggestions with regard to the review process:

1. Composition of Review Panel

In order to bring in fresh ideas and to revisit the issues from a fresh perspective, we suggest that international experts not associated with past reviews should be invited to form a new panel. This will also be essential in enhancing public perception on the authority and credibility of the review panel due to the chequered history of the SSDS.

2. Scope of Review

The cost, delay and technical difficulties in deep tunnelling were probably what prompted this review. However, we strongly advise that in order to come up with a viable alternative, the review panel should be given a broad mandate to revisit the following issues:

- (i) the trans-boundary nature of pollution in Hong Kong waters, in particular the long-term effect of pollution by neighbouring cities in the Pearl River delta;
- (ii) the desirability of a higher level of treatment, such as biological nutrient removal, to cater for the needs of a sustainable solution in the long run;

- (iii) the possibility of a distributed mode of siting sewage treatment facilities, thereby reducing the need for long stretches of deep tunnels and, if a higher level of treatment is adopted, the need for a long sea outfall.

### 3. Public Hearing

To increase the transparency of the panel, we suggest that the panel should conduct all third-party consultation and hearings in public, i.e. hearings with government departments, professionals, industry, green groups, community groups and any other party invited to make presentations to the panel. They should also conduct public consultation sessions in order to gather public opinion on the issue. All sessions involving third parties should be documented and the records made accessible to the general public.

Pollution in the harbour and surrounding waters has been a concern of Hong Kong citizens over a long time. It is unfortunate that our "fragrant harbour" has become one of the biggest misnomer ever since SSDS was first conceived in the 1970s. Over twenty years have passed and a proper solution to the pollution problems is still not in sight. The public has high hopes for the proposed review and we sincerely hope that the review will be carried through with a degree of innovation, thoroughness and political will that it deserves.

As a constructive green group, we would be more than happy to discuss with Legco members and the Administration on specific aspects of the review, so as to come up with a sustainable solution to Hong Kong's stinking problem.