

Friends of the Earth 地球之友

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**Submission to the Panel on Economic Services
Legislative Council
Hong Kong Special Administrative Region
11 November 1999**

Friends of the Earth's Position on the Proposed International Theme Park

Madam Chairman, Honorable Members of the Legislative Council,

Thank you for inviting us to raise our concerns on the proposed international theme park at the Penny's Bay on Lantau Island. In view of the wide implications of the proposed theme park development, as one of the leading green group in Hong Kong, we would like to express our concerns on the followings:

With reference to the Project Profile submitted to the Government for conducting the Environmental Impact Assessment at Penny's Bay, we found the followings are missing:

1. Associated air and noise impact assessment in the operational phase;
2. Costing and impacts of the storm water drainage system and its discharge to the surrounding natural habitat;
3. Justification of reclaiming the shores on both sides of the lake to build transport infrastructure;
4. The alignment of the sewerage to Siu Ho Wan Sewage Treatment Work and its upgrading work on treatment level (should be designed, built and put into operation simultaneously with the theme park);
5. The impacts of additional sewage from the operation of the theme park on the pollution loading of the North Lantau Water;
6. The cultural and heritage value of the underwater archaeological sites at Penny's Bay;
7. Impacts on fishery due to loss of habitats, nursery and spawning grounds and food supply;
8. Impacts on marine life, especially on the Chinese White Dolphin and Finless Porpoise due to loss in habitat and food supply;
9. Impacts of the Volatile Organic Compounds (VOCs) and heavy metals release to the air from firework and its cumulative impacts to the surrounding environment;
10. Impacts of using chlorine as disinfectant in the theme park (may generate some forms of organic chlorides that are toxic and carcinogenic)
11. A detail ecological impact assessment on terrestrial and marine habitat with justification of a four season survey;



12. Cumulative impact assessment on the transport load and associated air pollution from a number of large-scale projects planned in the North Eastern Part of the Lantau Island, e.g. Lantau New Town Development, the Proposed Lantau North-South Link, the proposed reclamation work at Tai Ho Wan.

These all bear substantial costs associated with the building of the international theme park. Yet the costing and time frame of the implementation of these essential environmental measures are still in vague.

FoE is of the view that if Hong Kong is to build a world-class international theme park with such a large scale and long term commitment, we have to assess the overall impacts on the sustainability of the project. Air, noise, waste, sewage, visual, ecological, fishery impacts are all essential elements that affect the sustainable development of Hong Kong. The implementation of these measures can be very costly. Yet, the Government has not comprehensively evaluated the hidden costs that could be an enormous burden for the people of Hong Kong which will last for a hundred years. Without a thorough cost-benefit analysis, FoE considers that it is risky and unjustifiable to push the project forward.

As a community group representing the public's environmental interest, we would urge the Honorable Panel Members to help us to ask the environmental rights and the opportunity costs that Hong Kong needs to trade off for this project. In this regard, if the proposed international theme park is to go ahead, we would request the proponent to compensate the ecological, environmental, cultural and social loss in the form of a trustee fund for Hong Kong to enhance its remaining ecological, cultural and historical heritage. We believe this will contribute to make Hong Kong a more attractive place to visit.

Thank you very much for your kind attention.

Friends of the Earth (Hong Kong)