



世界自然(香港)基金會  
香港中環纜車徑一號  
No.1 Tramway Path,  
Central, Hong Kong

WWF Hong Kong  
電話 Tel : (852) 2526 1011  
傳真 Fax: (852) 2845 2734  
wwf@wwf.org.hk  
www.wwf.org.hk

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## FACSIMILE TRANSMISSION

To: Bills Committee on Foreshore, Attn: Mr. Matthew Loo, Clerk to  
Sea-bed and Roads the Bills Committee  
(Amendment) Bill 2003,  
Legislative Council

From: Ms. Karen Woo Your Fax No.: 2869 6794

Your Tel. No.: 2509 4602 Page(s): 2 (Including this page)

Date: 10 April 2003

Subject: **Bills Committee on Foreshore, Sea-bed and Roads (Amendment) Bill 2003**

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Dear Sir,

Thank you for your letter of 3 April 2003 (Your Ref.: CB1/BC/5/02) to our Executive Director (Ms. Winnie Sek) inviting us to give views on the captioned Bill.

WWF Hong Kong understands that the captioned Bill aims to amend the Foreshore and Sea-bed (Reclamation) Ordinance (Cap. 127) and the Roads (Works, Use and Compensation) Ordinance (Cap. 370) to shorten the periods (from the existing time frame of 11 to 17 months max. to an expedited timeframe of 5 to 8 months max.) within which objections against proposed reclamations, plans or schemes may be lodged and resolved.

We appreciate the purpose of the amendment is to expedite the public works projects and in general, we support the proposal to shorten the period for **resolving** objections from 9 months to 4 months. However, we object against the proposal to shorten the public objection period from 2 months to 30 days and our views are summarised below:

1. We consider that the proposed 30 days objection period is too short to allow for a wide public participation and would therefore compromise the process of public participation in public works projects – an essential tenet of sustainable development.



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2. Public may not have sufficient time to fully understand the details of the project and make a decision on whether or not to raise an objection. Moreover, the time is also too short for public to make further deliberation on alternative project plans. From our experience, it may take at least one or two weeks' time to get the responses from the relevant works departments on public enquiry and sometimes it may even take longer if the project is large in scale. As a precautionary measure, public and stakeholders may lodge objections to all works, thereby ironically increasing the workload of the Government agents. Conversely, if the public and stakeholders are genuinely well-informed of the proposed works prior to the gazettal, there may be no objection raised during public consultation.
3. Approximately one year ago, we note that Government already implemented the "gazettal before completion of EIA" procedures for "non-controversial" project. If this measure is effective, then the works departments already shorten the public works time required and so retaining the 2 months public objection period should not be a problem.
4. We note that taking into account all the proposed reductions, the overall saving in time would be 6 to 9 months max. Therefore, even if one retains the 2-month objection period, there is still a saving of 5 to 8 months max in the whole process. We consider this would not significantly affect the ultimate aim of the proposed amendment.
5. Instead of shortening the public objection period to expedite the public works projects, we believe better coordination among different departments, an increase in work efficiency, streamlining the internal administrative procedures and internal consultation process would equally help to expedite public works projects.
6. Meanwhile, we also urge Government to improve the existing mechanisms to **enhance public consultation** so that public and the relevant stakeholders – particularly those directly impacted – would be well informed of the proposed works **both prior to and during the gazettal.**



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Thank you for your kind attention.

Yours faithfully,

Karen Woo  
Conservation Officer  
WWF Hong Kong