



**Greenpeace Submission to
Panel on Environmental Affairs &
Panel on Planning, Lands and Works
Legislative Council HKSAR
(Joint Meeting on 27 November 2003)**

**Objection to the Pollution caused by
Central Reclamation Phase III (CRIII) &
Wanchai Development Phase II (WDII)**

Introduction

Greenpeace is opposed to any marine pollution. We believe that reclamation will lead to environmental deterioration. In particular, if reclamation work involves inappropriate way of dredging and dumping contaminated sea sediments, the damage will be irreversible, and also pose a serious risk to human health.

It is estimated that the projects of Central Reclamation Phase III and Wanchai Development Phase II require dredging and disposing of approximately 1 million cubic metre (375,000 and 600,000 cubic metre respectively) seriously contaminated sediments at sea. ¹

The contaminated sediments contain high quantities of heavy metals such as lead, copper, mercury, silver, and zinc. In addition, the level of other toxic substances in the sediments such as polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs) and tributyltin (TBT) is also exceedingly high.² These contaminants are undoubtedly detrimental to the marine life. They can also cause damage to human health. Most of these contaminants are carcinogenic and can damage human blood cells, kidneys and the brain. If these contaminants are released into the marine environment, they will easily enter into the human food chain and the effects will be serious.

Dredging and dumping toxic mud in an apparently open system

We believe that as soon as the highly toxic sediment on the seabed of the Victoria Harbour is disturbed, the contaminants in the sediment are released into the wider marine environment. This includes the release of previously bound organic and inorganic constituents such as heavy metals, PAHs, PCBs and nutrients into the water column, either via suspension or by disturbance as a result of dredging activities, or depositing of fill materials

In addition, the Green Island and Junk Bay coral communities are located more than 5.5 km west and 6.5 km east of the WDII reclamation site, respectively. These ecological sensitive receivers are potentially impacted during the construction of the

¹ See Environmental Protection Department, *Central Reclamation Phase III Environmental Impact Assessment Report*, 2001, sec. 2.7.1., & also Environmental Protection Department, *Wanchai Phase II Environmental Impact Assessment Report*, 2001, sec. 6.6.1.

² See Environmental Protection Department, *Central Reclamation Phase III Environmental Impact Assessment Report*, 2001, Appendix P, & also Environmental Protection Department, *Wanchai Phase II*

WDII due to the sedimentation of the suspended solids in the water column. This is also admitted in the relevant environmental impact assessment reports.³

The disposal facility at East Sha Chau is in the proximity to the nursery of the endangered Chinese White Dolphin and the artificial reef complex. We believe that the disposal of the seriously contaminated sediment dredged from the harbour poses a serious risk to this vulnerable species, and via the food chain, also poses a risk to human health.

It is pointed out that sediments containing as little as 5% dredge spoils have a marked effect on the host defence capability in the common shrimp *C. crangon*. This could have serious implications for the dumping of contaminated dredge spoils at sea.⁴ It shows that even a minor change in the marine environment will have serious implications on the immune capability and clotting in animals exposed to harbour dredge spoils.

London Convention

According to the 1972 London Convention, to which Hong Kong is a signatory party, the Parties shall ‘promote the effective control of all sources of pollution of the marine environment, and pledge themselves especially to take all practicable steps to prevent the pollution of the sea by dumping of waste and other matter that is liable to create hazards to human health, to harm living resources and marine life’.⁵

It is blatantly obvious that the CRIII and WDII reclamation projects do not adhere to the spirit of the London Convention. No amount of mitigation measures will prevent toxic sediments from disposing into the harbour and the wider marine environment, including East Sha Chau, during the dredging and dumping operation.

More importantly, there has already been a global trend away from the disposal of toxic substances at sea. According the OSPAR Convention in Europe, a license for the disposal of waste at sea is issued ONLY when it can be shown that the disposal will in

Environmental Impact Assessment Report, 2001, sec. 6.4.

³ See Environmental Protection Department, *Wanchai Phase II Environmental Impact Assessment Report*, 2001, sec. 9.3.14.

⁴ Smith, V.J., Swindlehurst, R.J., Johnston, P.A. & Vethaak, A.D., ‘Disturbance of Host Defence Capability in the Common Shrimp, Crangon crangon, by Exposure to Harbour Dredge Spoils’, *Aquatic Toxicology* 32 (1995) 43-58.

⁵ United Nations, Convention on the Prevention of Marine Pollution by Dumping of Wastes and other matter, 1972, art. 1.

no way harm the environment. More importantly, no seriously contaminated waste is allowed to dump at sea. ⁶ It is deplorable that Hong Kong is still maintaining an environmentally destructive mud disposal practice. Hong Kong citizens have the right to have a clean and sustainable harbour, and not to be exposed to seafood that is contaminated by toxic substances. Greenpeace therefore finds appalling the disposal of 375,000 cubic metre of toxic sediment dredged from the site of the Central Reclamation Phase III to East Sha Chau.

Conclusion

Greenpeace urges the Hong Kong government to fulfil its responsibilities under the London Convention and to further enhance the current legislation by adopting a more precautionary approach in protecting the environment. It is also time for the government to take action to protect and clean up our fragile marine environment before it is too late, and to stop the CRIII and WDII Reclamation Projects immediately.

⁶ See OSPAR Commission, *Quality Status Report 2000*, 2001, sec. 3.9.1, <<http://www.ospar.org/eng/html/qsr2000/qec3.htm#3.9>> (21 November 2003).