Professional Views on the Implementation Plan for Harbour Area Treatment Scheme Stage 2

For and on behalf of the Hong Kong Institute of Environmental Impact Assessment

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The provision of the much needed upgrading of sewage treatment level in Hong Kong Island within the HATS catchment is fully supported. Discharges of sewage only preliminarily treated into the Victoria Harbour and Hong Kong Island South waters can no longer be considered as environmentally acceptable. The merits of centralized or distributed options have been subject to extensive reviews and debates. Given the current satisfactory performance records of the existing CEPT plants at the Stonecutter's Island and the feasibility of extending its capacity to cater for the sewage collected from the various nodes at Hong Kong Island, increased sewage volume due to future population growth and the possible need for treatment upgrade in the future, the proposed implementation plan represents a sound resource management practice aiming to improve the environment.

The distributed treatment option is severely constrained by limited space and proximity to the urban centres. Risks of adverse environmental impacts to adjacent land uses in case of failure of the mitigation measures cannot be ignored. Advances in sewage treatment technologies may make it possible for compact and/or underground treatment works to be sited in these congested areas. However, future upgrading would be severely restricted if at all possible. Stanley sewage treatment works, which was built within a cavern, is a good example.

HATS Stage 2 represents a very substantial investment by the Hong Kong people. However, it is not the end itself. The ultimate goal is to improve the marine environment of Hong Kong. Independent and unbiased environmental impact assessment is essential for safeguarding the achievement of this goal. A proper environmental data management system to monitor the performance of the new (upgraded) sewage treatment works, and the water quality and ecological conditions in Victoria Harbour and its surrounding waters, is critical to the success of the scheme. This includes not just data collection, but a design capable to detect any changes in the marine environment and to give adequate early warning for any need to upgrade. Information generated from the system should also be made available to policy

makers and the general public timely to facilitate rational debates and decision making on the way forward.

Overall, we support the proposed implementation plan for HATS Stage 2. It is a flexible plan making good use of current assets and resources to address existing urgent environmental needs while allowing for future changes.