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世界自然基金會  
香港分會

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## Legislative Council Panel on Development

Meeting on 1 June 2013

### WWF's response to the Government's strategy to enhance land supply through reclamation outside Victoria Harbour and rock cavern development

#### I. No Reclamation in the Habitats for Chinese White Dolphins

- In the government's newly released consultation document, out of the five proposed locations, Lung Kwu Tan and Siu Ho Wan are listed as the potential reclamation sites for enhancing land supply. **WWF strongly objects to the proposition of reclaiming these two sites, as they are located in the habitats of Chinese white dolphins (CWD), adjacent to their core areas in Hong Kong (i.e. Sha Chau and Lung Kwu Chau Marine Park and the proposed marine park at The Brothers).** Since the mid-90s, more than 1,400 hectares of sea area have been reclaimed in Hong Kong's western waters. This is within the relatively small area of Hong Kong waters inhabited by the CWD. In addition to a direct loss of the CWD's habitats, reclamation has affected fishery resources, which subsequently leads to a decrease in food supply for the CWD. Additional threats include past, present and future works on dredging, dumping and facilities installation. The impacts from water and noise pollution, and an increase in vessel traffic (in particular the high speed vessel), also play a role in degrading the CWD habitats. Government monitoring since 1996 suggests that approximately 200 CWD individuals inhabited the western waters of Hong Kong in 90s and early 2000s. However, in recent years, there has been a significant decrease in the number of dolphins sighted. According to the latest CWD monitoring survey commissioned by Agriculture, Fisheries and Conservation Department (AFCD), the CWD abundance in the three primary CWD habitats around the waters of Lantau (Southeast Lantau, The Brothers and Sha Chau and Lung Kwu Chau Marine Park) had declined significantly from 158 estimated in 2003 to 78 in 2011<sup>1</sup>. WWF worries that if the government insists to do reclamation in CWD's habitats,

<sup>1</sup> Hung, S.K. 2011. Monitoring of marine mammals in Hong Kong waters – Data collection (2011-12): final report (1 April 2011 to 31 March 2012). A report submitted to the Agriculture, Fisheries and Conservation Department of the HKSAR.

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more habitat loss, stress and disturbance will impose to the dolphin, resulting in further deterioration of the dolphin's already alarming situation.

- According to Approved Conditions of the Hong Kong-Zhuhai-Macao Bridge - Hong Kong Boundary Crossing Facilities Environmental Impact Assessment project, “*designation of the marine park would immediately follow the completion of the project*” (i.e. around 2016), and a proposed marine park boundary was released in 2011<sup>2</sup>. The size of the proposed marine park will be about 850 ha (see Figure 1 below), which is aimed to protect and enhance the CWD's habitats within the area, as well as marine ecology and fisheries resources in North Lantau waters. If Siu Ho Wan will be reclaimed, the work barges could only pass through the marine park to the construction site under restricted speed (<10 knot), and this increased marine traffic (frequency not yet known) will cause disturbance to the dolphins inhabiting in the marine park area. In addition, water pollution problem associated with reclamation works will likely cause impacts to the dolphins, other marine species and fisheries resources in the protected area. ***The potential impacts incurred from the reclamation contradict with the conservation purpose of the marine park, suggesting that the reclamation proposal at Siu Ho Wan has not been considered under a comprehensive planning that takes into account and attempts to address cumulative impacts from multiple developments. It also fails to address the conflicts from incompatible uses.***

## II. Reclamation is Irreversible and Destructive to the Environment

- Reclamation will lead to permanent loss of marine habitats and fishing grounds, and potentially eradicating breeding, nursery and foraging grounds of marine life. Modification of the coastline may also affect hydrology, coastal morphology, scenery, and water quality to the neighbouring areas, causing further negative impacts to the environment. WWF considers reclamation should be avoided in areas of high ecological value, such as habitats for coral, CWD, finless porpoise, mangrove and seagrass; intertidal mudflats and estuaries, as well as important breeding, nursery or foraging grounds for fisheries, horseshoe crabs, birds and green turtles. Areas with natural coastline should also be avoided.

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<sup>2</sup> [http://www.hzmbenpo.com/ep\\_docs/HKBCF/new\\_marine\\_park.pdf](http://www.hzmbenpo.com/ep_docs/HKBCF/new_marine_park.pdf)

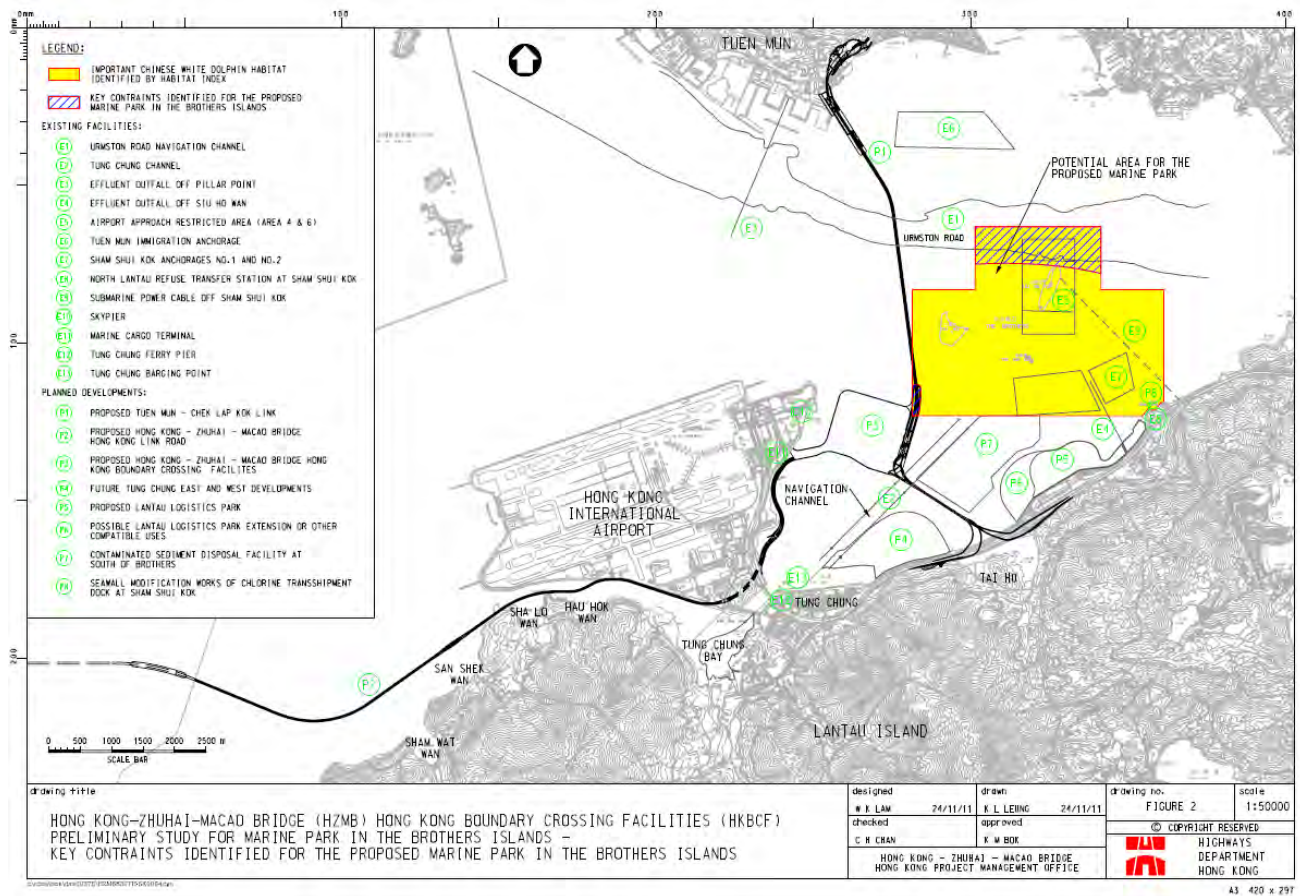


Figure 1: Proposed marine park at The Brothers (indicated in yellow).

Source: [http://www.hzmbenpo.com/ep\\_docs/HKBCF/new\\_marine\\_park.pdf](http://www.hzmbenpo.com/ep_docs/HKBCF/new_marine_park.pdf)

### III. Reclamation Undermine the Benefits from Trawl Ban

- With the support from the honourable Legislative Council, the ban on all the trawling activities in Hong Kong waters is in effect to rebuild our devastated marine ecosystem and to establish a sustainable fishery. A 2012 study conducted by fisheries experts at the University of British Columbia and commissioned by WWF estimates that the loss of fish catches from the airport proposed third runway reclamations, of a size around 650 hectares, will directly cause 31 fishers to lose their jobs. It is not just the livelihoods of the fishing community will be affected, reclamation will also impose negative impacts on marine eco-tourism and other sustainable uses of the sea. Reclamation will not only undermine the social and ecological benefits that will result from the trawling ban, but will also offset the conservation outcomes from the recovering marine ecosystem and fishery resources.

- Since the livelihoods of fishing communities and the fisheries resources are directly affected by reclamation, WWF considers fisheries impacts should be regarded as a standalone site selection criterion for the reclamation consultation.

#### **IV. Mainstreaming Biodiversity & Sustainable Development**

- The Convention on Biological Diversity (CBD) has already been extended to Hong Kong in 2011. The Aichi Biodiversity Targets in the 2011-2020 Strategic Plan under the CBD have set a clear goal to address the underlying causes of biodiversity loss, by mainstreaming biodiversity across government and society (Strategic Goal A)<sup>3</sup>. The Hong Kong Government has an obligation to integrate biodiversity values into developments and planning processes.
- In 2011, the UK Government has adopted the approach of mainstreaming sustainable development (SD) which in broad terms consists of providing Ministerial leadership and oversight, leading by example, embedding SD into policy, and transparent and independent scrutiny<sup>4</sup>. For instance, the Environment Secretary will sit on the key domestic policy committees, including the Economic Affairs Committee, to enforce the Government's commitment to sustainability in policy making. The Department for Environment, Food and Rural Affairs will also take the lead responsibility for reviewing departmental business plans in relation to SD principles. The Minister for Government Policy will then hold departments to account through the quarterly business plan review.
- Hong Kong, however, is currently lacking of a holistic policy framework on sustainable development and biodiversity conservation. Government should make reference to the best practice overseas for formulating clear and measurable sustainable development and conservation policy targets, as well as integrating and implementing such cross-bureau policies led by top-ranked officials. WWF considers Hong Kong should devise a long-term Vision for sustainable development to ensure our economic growth supports protecting and enhancing the environmental resources that underpin it<sup>6</sup> and that the Government should initiate a process for the Hong Kong people to be involved in charting out this policy.
- Certain tools can be used to support sustainable development. For instance, a comprehensive Strategic Environmental Assessment (SEA) should be conducted to assess the cumulative impacts from all the projects in the vicinity of the reclamation areas. In addition, assessing the

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<sup>3</sup> Convention on Biological Biodiversity. Strategic Plan for Biodiversity 2011-2020. <http://www.cbd.int/sp/targets/>

<sup>4</sup> Mainstreaming Sustainable Development, the Coalition Government's vision for sustainable development. <http://sd.defra.gov.uk/gov/vision/>

environmental and social costs for major infrastructures, including large-scale reclamations, can help decision makers and the public to see the bigger picture of such projects, and thus evaluate them against a SD agenda. .

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Michael Lau". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Michael Lau

Acting Director, Conservation

WWF-Hong Kong