



WWF's Submission on the Third Runway Project For the Legislative Council Panel on Economic Development on 29 Sept 2014

WWF-Hong Kong is deeply disappointed with the quality of the Third Runway Environmental Impact Assessment (EIA) report, which is supposed to mitigate negative impacts of the proposed third runway construction. It has failed to properly address the potential impacts to the marine ecology, in particular Chinese white dolphins (CWD), as well as fisheries resources.

Over the past 20 years, over 2,000 hectares Hong Kong's irreplaceable marine habitat has been destroyed or degraded by dredging, dumping and reclamation work. The direct loss of sea area resulting from the reclamation work of the Third Runway project will be 650 hectares and during the construction phase an additional 981 hectares will also be heavily impacted.

The reclamation area for the third runway will be in the middle of CWD habitat, and is adding further stress to a species whose population is already collapsing. The population has dropped by more than 60% in the past decade in Hong Kong waters¹, and 30% in the Pearl River Estuary². The Third Runway project could well deliver the final blow to the dolphin.

In response to this, the Airport Authority has proposed to extend the existing Lung Kwu Chau marine park, and also include the security exclusion zone around the new runway (which in any case is de-facto protected for security reasons).

This new Marine Park proposed by AAHK is:

- at the wrong time (it will only be designated in 2023, after all the construction works are

¹ The dolphin number in Hong Kong has dropped from 158 individuals in 2003 to 62 individuals in 2013.

² Approximately 30% decline of Chinese white dolphin in Pearl River Estuary was recorded in seven years, from 2,500 individuals in 2006 down to 1,800 individuals in 2013.

completed, even though the dolphin population is expected to continue to decline over the next 9 years).

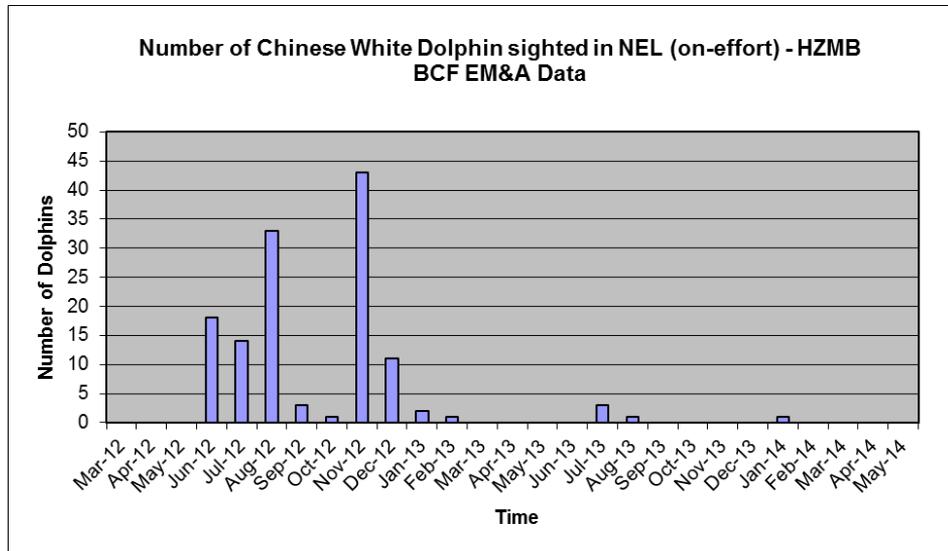
- in the wrong place (adjacent to the runway itself which is not the most prime dolphin habitat)

In view of this, it is absurd to have the Marine Park being designated after the completion of construction work. Their population capacity and survival chance will be further hammered by the third runway reclamation. No one can guarantee how many dolphins will return and use the areas in the new Marine Park and in how many years.

Lessons learned from the Hong Kong-Zhuhai-Macao Bridge (HZMB) Project

The purpose of setting up a marine protected area is to conserve the marine environment and provide a sanctuary for the marine species to inhabit, with human disturbance being kept to minimal (e.g. development-free, vessel speed restriction, regulated human activities). However, the establishment of Marine Park in Hong Kong has recently been used as a compensation measure for large-scale development project after the construction works have been completed. One example is the Hong Kong-Zuhai-Macao Bridge project. The Brothers Island Marine Park will be designated in 2016 as the operational phase compensation measure of the project, while there is no measure to safeguard and conserve the disturbed population during the construction phase. The EM&A data has been showing that there is a sharp decline of dolphins using the northeastern Lantau waters (see below) where the HZMB-associated construction works (including the reclamatoin works of HKBCF and HKLR as well as bored piling activities of TMCLKL) locates. Concerns have been raised on the viability and effectiveness of the future Brothers Island Marine Park – whether none or only very few dolphins will return to use the Marine Park area, which was once a core area of activities for CWDs in the western waters (please also refer to Appendix 1).

In addition, the majority of dolphin individuals surveyed shifted their overall ranges away from the Brothers Islands to north Lantau after the commencement of HZMB construction work.

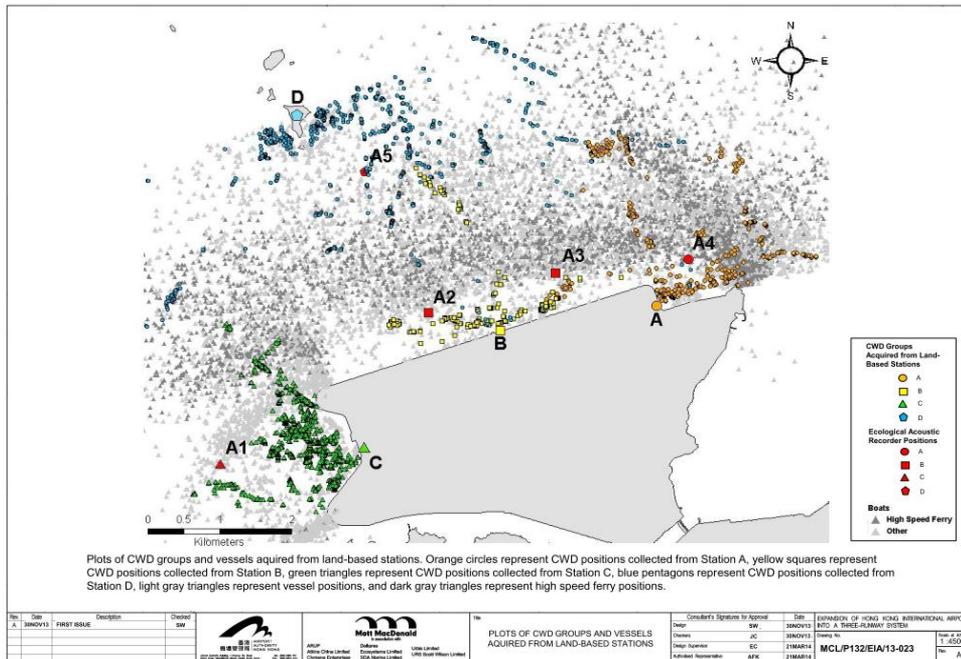


The pledge to designate Southwest Lantau and Soko Islands Marine Park by early 2017 cannot be treated as mitigation measure of the third runway

Proposals to designate the two marine parks span back to 2002 but never came to fruition due to opposition from the fisheries sector and Lantau residents. While ACE members are having environmental hearing on the proposed third runway, the surprise announcement of the new designation timetable may mislead the members that mitigation measures is enough to protect the precious Chinese white dolphin. As confirmed by the AFCD the two new marine parks is nothing related to the project, WWF believes a marine park proposed by the AAHK should expand to cover the entire core habitat of CWDs in West Lantau and linked with the existing Sha Chau and Lung Kwu Chau Marine Parks in order to optimize the conservation of Chinese white dolphins.

Usage of north Lantau areas

High speed vessels traffic from the SkyPier has been affecting the CWD area of usage during the daytime. From the below figure, it was shown that CWDs were observed less in areas where high speed vessel traffic was high. However, according to the findings of passive acoustic monitoring, clicks from dolphins were detected off north Lantau (the project footprint), indicating that the dolphins may utilize that area where there is less disturbance from the marine traffic during nighttime.



Marine Ecology and Fisheries resources:

The plan does not just threaten the Chinese white dolphin. Fish species such as the endangered Longheaded eagle ray, the vulnerable Long-tooth grouper, and rare gorgonian coral species will be affected by this construction. The local population status of these species is currently unknown. Yet the AAHK fails to assess the impacts and adequately address these threats.

- Longheaded eagle ray (IUCN Red List: Endangered)
- Pale edged sting ray (IUCN Red List: Near Threatened)
- Goatee croaker (China Species Red List: Vulnerable)
- Long tooth grouper (IUCN Red List: Vulnerable)
- Orange spotted grouper (IUCN Red List: Near Threatened)
- Tiger toothed croaker (China Species Red List: Vulnerable)

According to the Third Runway EIA Report, these species are highly mobile, the affected populations are small and there is an availability of suitable habitats in other areas. As the local population status of these species is unknown, the impacts could not be assessed. What is known, however, is that this project will definitely destroy an area which all these species inhabit.

For corals, according to a territory-wide octocoral study commissioned by the AFCD in 2008, of the 67 species of octocoral recorded in Hong Kong waters, only one gorgonian species – classified as globally rare and named *Guaiaigorgia* – has been found in the western waters. Unfortunately, due to a lack of research, no gorgonian species are currently listed in any protection regulations. WWF urges the reconsideration and re-evaluation of the conservation importance of this species.

Self-destroying the “No Take Zone”

The Hong Kong International Airport Approach Area has been established in the northern extent of the airport since its establishment in 1998. It is considered as a “non-statutory” no-take marine protected area as no fishing activity is allowed.

Since the area has remained undisturbed for almost 16 years, and in particular as no trawling has occurred, a richer and higher abundance of marine fauna and vulnerable fish species were found from the EIA survey, compared to the surrounding unprotected area. However, 240 ha of such “No Take Zone” will all be destroyed and lost due to the reclamation work.

WWF's key asks:

The approach of "Development first, Conservation later" is not working and it is now a golden moment for a change.

1. In order to enhance the population capacity of the dolphins in the local waters, the proposed marine park should be expanded to cover the entire core habitat of CWDs in West Lantau and linked with the existing Sha Chau and Lung Kwu Chau Marine Parks in order to optimize the conservation of Chinese white dolphins. **The Advisory Council on the Environment (ACE) should reject the EIA report if Marine Parks has not been designated in the proposed area before the commencement of project.**
2. The government should immediately evaluate the effectiveness of the mitigation measures adopted in current and previous development projects. **The construction work should not start until the mitigation measures are proven to be effective to conserve the affect species and its habitat.**
3. High-speed marine vessel traffic between Lantau Island and the Soko Islands should be re-routed to allow dolphins to use their core habitats without hindrance.
4. A comprehensive management plan which addresses the numerous threats faced by CWDs in Hong Kong should be developed and implemented by all relevant government departments.

- End of paper -