

Clerk to Panel on Development
Legislative Council Secretariat
(E-mail: panel_dev@legco.gov.hk)



By email only

10 April 2019

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY
Since 1957 成立

Dear Legislative Council members,

Views on "Studies related to artificial islands in the central waters"

Given that there are still many other land supply options available (such as brownfields and vacant land), the Hong Kong Bird Watching Society (HKBWS) objects to the proposed artificial island in central waters as it requires large scale reclamation which would lead to permanent irreversible damages to both marine and terrestrial habitats and ecosystem in the area. Seven environmental and concern groups already raised their ecological concerns on the artificial islands (please refer to Attachment 1).



The central waters was often claimed as “ecologically less sensitive”^{1,2} with reference to the Enhancing Land Supply Strategy Study commissioned by the Civil Engineering and Development Department in 2011. However, the site selection process was conducted based a desktop review of previous studies³. Given that the central waters is generally less studied and is not covered by the existing regular ecological monitoring programmes (e.g. corals⁴ and marine mammals⁵), we are concerned the proposed artificial islands would lead to a potential permanent loss and damage in an important

¹ Preliminary concepts for the East Lantau Metropolis booklet of the Hong Kong 2030+

² Development Bureau. (2019). *Administration's paper on studies related to artificial islands in the central waters, Lantau Conservation Fund and work progress of the Sustainable Lantau Office (LC Paper No. CB(1)729/18-19(03))*. Retrieved from <https://www.legco.gov.hk/yr18-19/english/panels/dev/papers/dev20190326cb1-729-3-e.pdf>

³ Civil Engineering Development Department. (2014). *Final Strategic Environmental Assessment Report - Reclamation Sites (under Agreement No. 9/2011 Increasing land supply by reclamation and rock cavern development cum public engagement - Feasibility Study)*. Retrieved from https://www.cedd.gov.hk/eng/landsupply/doc/Final%20SEA%20Report_reclamation_CEDD%20web.pdf

⁴ **The Hong Kong Reef Check coordinated by the AFCD only covers the best coral growing sites known in the eastern part of Hong Kong waters extending from Tung Ping Chau in the north to Ninepin Groups in the south.** Please refer to the summary of the Hong Kong Reef Check 2018, retrieved from https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_cor/con_mar_cor_hkrc/files/summary2018eng.pdf

⁵ **The central waters was excluded in both the line-transect surveys and helicopter surveys for the monitoring of marine mammals in Hong Kong waters.** Please refer to Figure 1 and 2 of the Final Report (1 April 2017 to 31 March 2018) of the Monitoring of Marine Mammals in Hong Kong Waters (2017-18) under the Hong Kong Cetacean Research Project, retrieved from https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_chi/con_mar_chi_chi/files/Final_Report_2017_18.pdf

part of Hong Kong's ecology. **We urge the Government to stop the artificial island project, instead, a comprehensive marine and terrestrial ecological data in the central waters and islands should be provided first so as to assess if the area is suitable for any kinds of development.**

White-bellied Sea Eagle is a nationally Class II protected raptor. As they are sensitive to human disturbance during the breeding season, their nesting and breeding sites are often limited to uninhabited coastlines or offshore islands. The central waters has been one of their breeding and foraging areas for more than 20 years, yet the breeding sites are continuously facing various development threats and disturbance (e.g. Disneyland development at Penny's Bay and the construction of the Integrated Waste Management Facilities at Shek Kwu Chau). During our survey in early 2019, we discovered an active nest used by a pair of White-bellied Sea Eagles on Sunshine Island (Figure 1). Besides, Little Green Island is a breeding and nesting site for Little Egrets, Great Egrets and Black-crowned Night Heron since 2004. It was the fifth largest egretry in Hong Kong in 2017 with a total of 80 nests⁶. Nesting site of Pacific Reef Heron was also recorded on Kau Yi Chau⁷. Moreover, the endemic Bogadek's Burrowing Lizard was only recorded on three islands in the central waters, but not elsewhere in Hong Kong or in the world⁸. Sunshine Island was designated as a Site of Special Scientific Interest (SSSI) in 2015 for the conservation of this species⁹. **It is clear that the ecology of the outlying islands in the central waters is unique in Hong Kong and is of conservation concern.**

We are concerned the large scale reclamation works for the construction of the artificial islands and the proposed road connection from Kennedy Town would have **great disturbance on breeding and foraging grounds of birds, which in turn would affect their breeding success and the viability of their population in Hong Kong.** The human activities of the large population on the artificial islands would also **inevitably lead to undesirable disturbance (e.g. hiking and recreational activities on the islands, introduction of invasive species) to the nearby islands of conservation concern.** In the worst case scenario, such disturbance may damage the fragile ecosystem on the islands and **may even wipe out the population of the endemic Bogadek's Burrowing Lizard.**

⁶ Anon, 2017. Summer 2017 Report: Egretty Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site. Report by The Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong Special Administrative Region Government.

⁷ Civil Engineering and Development Department. (2015). *Technical Study on Transport Infrastructure at Kennedy Town for Connecting to East Lantau Metropolis – Final Report (Agreement No. CE 11/2015 (HY))*. Retrieved from

https://www.cedd.gov.hk/eng/landsupply/doc/Kennedy%20Town_Final%20Report_Eng.pdf

⁸ http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=3132

⁹ <http://www.afcd.gov.hk/misc/download/annualreport2015/en/nature.html>

HKBWS hopes members of the Legislative Council would consider our comments above and object to the development of the artificial islands in central waters.

Thank you for your kind attention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', written in a cursive style.

Woo Ming Chuan
Senior Conservation Officer
The Hong Kong Bird Watching Society

Figure 1. During our survey in early 2019, we discovered an active nest used by a pair of White-bellied Sea Eagles on Sunshine Island.



25 March 2019

Dear Chairman and Members of Panel on Development of Legislative Council,

**Updated survey findings indicate the ecological importance of East Lantau waters
Groups urge the Government to abandon “Lantau Tomorrow”**

The Government is planning to discuss issues related to artificial islands in the central waters in Panel on Development of Legislative Council on 26 March, while announcement of the preliminary estimated cost for “Lantau Tomorrow” was made on 19 March. In response to the above, we (seven environmental and concerned groups) would like to report our preliminary findings of ecological surveys and argue against the Government’s claim of “central waters is relatively ecologically less sensitive”.

We have conducted ecological surveys on Sunshine Islands and in surrounding waters during the winter of 2018/19. Preliminary findings indicate the area is of conservation importance both on land and in the sea. We have recorded an active nest of the nationally Class II protected White-bellied Sea Eagle and the Bogadek’s Burrowing Lizard endemic to Hong Kong on Sunshine Island, and also the very rare Sea Pen in the central waters. These findings reflect the East Lantau waters is of ecological importance. However, the Government claimed the East Lantau waters is of low ecological sensitivity without thorough and comprehensive investigation and research. This clearly underestimates the ecological value of the area and misleads the general public to support the reclamation project. Understanding the ecological importance of an area requires long-term monitoring, research and study, which cannot be replaced by just one or two Environmental Impact Assessments. We are deeply concerned reclamation will not only irreversibly alter the marine environment, but also directly threaten marine and terrestrial wildlife. We urge the Government to abandon the reclamation plan and develop brownfields first.

Adverse impacts on rare species endemic to Hong Kong

Sunshine Island is an important site for the Bogadek’s Burrowing Lizard, which is a reptile species endemic to Hong Kong (i.e. no other records globally), and it is only found on Sunshine Island, Shek Kwu Chau and Hei Ling Chau. The Government even designated Sunshine Island as a Site of Special Scientific Interest (SSSI) for the conservation of this species. We are in grave concern that the associated potential impacts of the development, such as increase in human disturbance and introduction of invasive species, may cause detrimental impacts on this endemic species, or in the worst case scenario, may even wipe out the whole population on the islands, and globally.

Adverse impacts on the rare coral particularly found in central waters

The East Lantau waters has always been under studied. Yet we recorded the very rare Sea Pen Pennatulacea (海筆) during our diving surveys last year. This type of coral was not recorded or found in surveys conducted in others areas of Hong Kong waters. Little is known for Sea Pen both locally and globally due to their retractable and hidden characteristic. We are concerned the reclamation works would have direct adverse impacts on the rare coral community and benthic organisms in the area.

Adverse impacts on local breeding birds

White-bellied Sea Eagle has an estimated population of about 30 individuals in Hong Kong. As they are sensitive to human disturbance during the breeding season, they often select uninhabited coastlines or offshore islands for nesting and breeding. Hong Kong is an important breeding ground in

Southern China, while the active nest at Sunshine Island is quite a recent discovery in the East Lantau waters. There is also a nesting colony of egrets and herons on Little Green Island since 2004. We are concerned the large scale reclamation works and the proposed road connection from Kennedy Town would have great disturbance on breeding and foraging grounds of birds, which in turn would affect their breeding success and the viability of their population in Hong Kong.

Past developments records indicate ecology and wildlife were inadequately protected

East Lantau waters is an ecologically sensitive area and should be conserved. However, previous coastal developments demonstrate that marine habitats and wildlife cannot be adequately protected. Even though the reclamation in the North Lantau waters were approved and implemented according to the issued environmental permit, Chinese White Dolphin in North Lantau waters dropped significantly and have eventually disappeared since 2015, while their total number in Hong Kong reached a historical low of 47 individuals in 2017. Given that there is little surveying effort in the East Lantau waters, we consider that “conservation first, development later” and precautionary principles should be adopted for any development.

Adverse impacts of Lantau Tomorrow on surrounding ecological environment

Even though the first stage of Lantau Tomorrow is now proposed to connect to Lantau at Sunny Bay, we are concerned the road links will eventually reach Mui Wo and other areas of South Lantau as the development plan proceeds. This contradicts and jeopardizes the Government’s pledge to conserve South Lantau. The subsequent transport load will destroy the pristine and tranquil South Lantau by deteriorating the air quality with vehicular exhaust emissions, facilitating fly-tipping of waste transported from construction works of/on the artificial islands and encouraging unplanned, chaotic and incompatible developments on South Lantau.

Brownfield first

Our natural environment is an important element of the quality of life in Hong Kong. Given that there are still many other land supply options available, the Government should not consider the option of reclamation as it will bring irreversible and permanent adverse impacts on the environment. Development of brownfields received the most support from the public with an estimated cost of just 33.3 billion, which is about one-fourth of the cost for reclamation. This can provide 139,000 public housing flats, at the same time phase out brownfield operation and protect the countryside.

Lastly, we would like to reiterate that there should be no conflict between protecting the sea and providing adequate housing. We urge the Government to abandon the reclamation plan, fully utilize all brownfields and vacant lands, and be determined to fix loopholes in the current housing, economy and planning system.

Environmental and concerned groups include (in alphabetical order):

The Conservancy Association
Designing Hong Kong
Greenpeace East Asia - Hong Kong office
Green Power
The Hong Kong Bird Watching Society
Hong Kong Dolphin Conservation Society
Save Lantau Alliance

2019 年 3 月 25 日

致 立法會發展事務委員會主席及各委員：

生態調查反映東大嶼水域具生態價值 環保團體促請政府撤回「明日大嶼」

政府擬於 3 月 26 日在立法會發展事務委員會討論有關中部水域人工島的事宜，亦已於 3 月 19 日公佈「明日大嶼」（下稱填海）的初步成本估算，我們七個環保及關注團體希望籍發佈「生態調查初步觀察」（下稱調查），反駁政府「中部水域生態敏感度相對低」的說法。

我們各團體分別於 2018/19 冬季前往位於東大嶼水域的周公島及鄰近水域/海底進行生態調查，初步錄得該水域具有陸地與海洋的生態價值。我們在鄰近填海選址的周公島錄得具國家二級保護野生動物白腹海鷗的鳥巢、香港獨有的鮑氏雙足蜥，及在中部水域錄得稀有的海筆，反映東大嶼水域具生態價值。然而，政府『未研究先立論』，認為其生態敏感度低，是嚴重低估東大嶼水域的生態價值，並有誤導市民支持填海計劃之嫌疑。我們認為生態價值需要長時間觀察與調查，絕非一或兩次環境影響評估就能確立。一旦於東大嶼進行填海，勢必破壞海洋、陸地生物的棲息及繁殖地，我們促請政府撤回填海工程，優先發展棕地。

對香港獨有物種的影響

周公島是鮑氏雙足蜥重要的棲息地。香港雙足蜥(又名鮑氏雙足蜥)是香港獨有的爬行動物，全球只在周公島、喜靈洲及石鼓洲發現。政府為保育此物種，更把周公島劃為『具特殊科學價值地點』。發展連帶的影響，例如人為干擾增加、引入外來物種等，會對此香港特有種造成傷害，甚至會令牠面臨絕種的威脅。

對中部水域特有的罕有珊瑚的影響

東大嶼水域只有為數不多的海洋調查，我們卻於去年的海底調查中錄得罕有的海筆。這類珊瑚在本港其他水域的調查及相片紀錄中均無發現。由於海筆經常隱埋在海床，全球對這種海洋底棲生物的認知甚少，填海工程將直接影響該處的罕有珊瑚群落和底棲生物。

對本地繁殖雀鳥的影響

本港有約 30 隻白腹海鷗，牠們在繁殖期間對人類活動非常敏感，往往選擇無人居住的海岸，或離岸島嶼築巢繁殖。香港是牠們在華南地區重要的繁殖地，位於東大嶼水域的周公島更是新發現的繁殖地。另外自 2004 年起，小青洲上亦有鷺鳥築巢繁殖的紀錄。填海工程及建議中連接堅尼地城的道路，嚴重干擾雀鳥繁殖及覓食，最終影響牠們的繁殖成功率，更令其在港的數量減少。

過往發展證明生態沒有被充分保護

東大嶼水域生態敏感度高，值得保育，惟過往不少海岸發展證明，當局無法充分保護生態。雖然北大嶼水域填海工程獲批環境許可證，但 2015 年中華白海豚數量在該處水域絕跡，至 2017 年全港水域更餘 47 條，是為歷史新低。現時填海的生態調查甚少，任何發展都應遵守『先保育後發展』及以預防性原則看待環境。

明日大嶼對周邊環境及生態的影響

即使明日大嶼第一階段現時建議接駁至大嶼山欣澳，我們擔心隨著發展計劃展開，道路最終會都會接駁到梅窩及其他南大嶼地區，這與政府保育南大嶼的承諾背道而馳。隨之而來的交通負荷將破壞南大嶼原有的恬靜怡人的面貌，如加劇路邊空氣污染、方便人工島上的工程把廢料隨處傾倒、鼓勵南大嶼更多無規劃、混亂、毫不配合的發展。

棕土優先

自然環境是香港宜居的重要元素，現時仍有其他土地選項，政府不應貿然填海，對環境帶來不可逆轉的破壞。棕地獲得最多民意支持，造地成本僅 333 億元，是填海約四分之一，即可建 13 萬 9 千伙公營房屋，並取締棕地上的非法作業，保護鄉郊環境。

最後我們需要重申「海洋住屋不對立」，並促請政府撤回填海工程、充分善用棕地和閒置土地，並解決房屋、經濟及規劃等制度的漏洞及問題。

聯署環保及關注團體（排名不分先後）：

長春社

綠色和平

綠色力量

香港觀鳥會

香港海豚保育學會

守護大嶼聯盟

創建香港