世界自然基金會
香港分會

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Chairman and Members of Public Works Subcommittee, Legislative Council
(c/o Clerk to Public Works Subcommittee)
Legislative Council Complex,
1 Legislative Council Road, Central, Hong Kong

16 March 2020
(By post and e-mail)

Dear Sir/Madam,

Re: Public Works Subcommittee Meeting on 18 March 2020, agenda item #IV " 767CL - Planning and engineering study for Lung Kwu Tan reclamation and the re-planning of Tuen Mun West Area"

We understand the above captioned will be discussed during the meeting of the Public Works Subcommittee on 18 March 2020. WWF-Hong Kong (WWF) objects to the proposed reclamation and reaffirms our position that reclamation should be the last resort for terrestrial developments. We call on the government to implement coastal and marine spatial planning prior to any development or reclamation plan.

Due to marine infrastructure projects and development pressure, Chinese white dolphin numbers in Hong Kong has plummeted more than 80% over the past 15 years. According to the 2018/19 Annual Marine Mammal Monitoring Report by the Agriculture, Fisheries and Conservation Department (AFCD), dolphin numbers in Hong Kong waters has dropped drastically, to a historic low of an estimated 32 individuals, a decline of over 30% compared to data released in 2018. The findings have raised a red flag that the species' disappearance in Hong Kong waters is imminent, highlighting the urgent need to conserve the remaining core habitats for the dolphins. Any further loss or disturbance to marine habitats through development, including reclamation, has potential to contribute to the extirpation of this species from Hong Kong waters.

The Sha Chau and Lung Kwu Chau Marine Park is one of the already very restricted coastal key habitats for the dolphins in Hong Kong waters. The proposed reclamation site is only 1 km away from this marine park, which is designated to provide a refuge for and help safeguard the threatened dolphins. The reclamation will undoubtedly reduce the habitat integrity of the marine park, just as other major construction works, such as the Hong Kong-Zhuhai-Macau Bridge, have weakened the conservation function of the Brothers Marine Park since 2005. The negative impacts on dolphins are not just from filling in the ocean and destroying feeding habitat, but also stem from noise disturbance

that disrupts their feeding behavior and social systems, increased toxins and debris in the water, and increased boat traffic leading to collisions (see below). The proposed reclamation works will add further stress upon the already very threatened dolphins, forcing them to move farther away, possibly towards less favoured waters with reduced prey supply.

Several threats are of particular concern regarding their potential impacts on local dolphins:

1. **Habitat Disturbance from Coastal Development**

The natural coastlines of Sha Chau and Lung Kwu Chau that are in close proximity to proposed reclamation works have been identified as an optimal feeding zone for the dolphins. Extensive reclamation by past and current projects, such as the Hong Kong International Airport, Hong Kong-Zhuhai-Macao Bridge, and the third airport runway, altered and degraded natural and intact shorelines and nearshore waters crucial for dolphin feeding.

2. **Underwater Noise Pollution**

Dolphins rely on echolocation for hunting, communication, and navigation. Coastal construction works and increasing marine traffic will pose threats of obscuring sounds and acoustic communication, also interfering with echolocation. High levels of noise can lead to disturbance and hearing loss (as manifested by changes in dolphin acoustic behaviour), or even death in dolphins.

3. **Vessel Strike and Traffic**

More frequent vessel operations just offshore from the Urmston Road during construction phase are likely to increase the risk of dolphins being disturbed, hit, injured, or killed by vessels. The presence of oncoming vessel and heavy marine traffic is also likely to alter dolphin habitat use, causing the dolphins to avoid or abandon the increasingly disturbed Sha Chau and Lung Kwu Chau Marine Park.

4. **Water pollution**

The level of suspended solids, toxins, and debris in the water column typically elevates during marine construction and development. An increase in suspended solids raises the risk of clogging gills in prey fish that dolphins prefer. Increases in sediment and toxin levels will subsequently lower the amount of food available for the dolphins and reduce dolphin survival. Dolphins are known to sequester certain toxins associated with construction activities and these, in turn, impact health and reproduction. The construction works may also lower the dissolved oxygen concentration in the water column and result in decreased feeding success in the dolphins.

In order to safeguard the limited remaining habitats for the dolphins and define appropriate area for development use, WWF urges the government to make reference to

the environmentally-balanced land and marine spatial planning and immediately implement a planning exercise for proper usage of our sea in line with the processes occurring in the rest of the Greater Bay Area within Guangdong. This should involve a three-year baseline assessment of coastal and marine environments. Marine spatial planning is a robust, accountable and widely accepted public process that helps analyse and allocate the spatial and temporal distribution of human activities in the most appropriate way to minimise conflicts and find synergies among sectors. Economic benefits have been shown to include reduced transaction costs, improved certainty and predictability for government and private investment, and enhanced attractiveness of coastal regions. A coalition of Chinese white dolphin experts and conservationists will soon publish an urgent action plan to save the species in the Pearl River Delta, including Hong Kong waters, and the Government is urged to review and consider its recommendations.

Our sea is an important and precious resource, and should be carefully managed to conserve biodiversity, support fisheries, businesses, recreation, and a high quality of life. A healthy sea provides a wealth of benefits to Hong Kong communities. WWF continues to object any reclamation without a proper coastal and marine spatial planning.

Yours faithfully,

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c.c. Secretary for the Environment, Wong Kam-sing, GBS, JP