



Hong Kong Dolphin Conservation Society 香港海豚保育學會

[PWSC(2019-20)26]

Dear Public Works Subcommittee,

Opinions on the dolphin assessment of Lung Kwu Tan (LKT) by CEDD

We strongly disagree with the proposed Lung Kwu Tan reclamation as the impact of the proposed reclamation will cause unacceptable environmental problems and threaten the protected Chinese white dolphins (CWD). Here we will also point out the problem of the ‘Technical Study on Reclamation at Lung Kwu Tan’ completed by CEDD.

First, we know that North Lantau region is an important habitat for CWD for a long time in the past two decades, and most certainly the waters near LKT have been identified as **important dolphin habitats** (see Figure 1), in particular the waters around Black Point and Pillar Point, as well as the nearby Urmston Road (at the section between LKT and Lung Kwu Chau) and the Sha Chau and Lung Kwu Chau Marine Park (SCLKCMP) which is only located several kilometres away from LKT (see Figure 2). Therefore, historically there is no doubt that the waters near LKT (including the inshore waters) should be an area of concern for CWD where the large-scale reclamation is currently proposed.

Then in 2012, the HZMB construction began and the dolphin numbers have been on a significant and dramatic decline ever since, to historical low in recent years (see the recent AFCD reports in 2017-18 & 2018-19 as reference). BUT, supposedly according to the original plan, dolphin usage in North Lantau region will recover from such "temporary" disturbance from the bridge construction, but this has never happened, mainly due to the massive reclamation in association with the third runway expansion commenced in 2016 which is not too far away from LKT. And according to the current "plan" as detailed in the third runway expansion EIA document, the government is confident with Airport Authority's assessment that the dolphins will come back (if that would not happen, then the EIA will never pass in the first place) because after the massive reclamation is over in 2023, **there will be a large marine park to be established by the Airport Authority as a habitat loss compensation measure to lure back the dolphins** (see Figure 2, 3). This is the plan endorsed by the Hong Kong Government to move things forward for dolphin conservation in North Lantau region after the dolphin habitat has been greatly degraded and lost from another massive reclamation from the third runway expansion. The simple logic is that any reclamation near this large marine park (such as the one proposed at LKT) that would result in further loss of marine habitat would seriously affect any chance of recovery in dolphin usage in the future, and most certainly ruin the effectiveness of such marine park.

Within this context, one can hardly argue for more reclamation works to be carried out in North Lantau region (in this case at LKT), especially near a sensitive habitat (i.e. SCLKCMP) which is

the last remaining habitat the dolphins would utilize in North Lantau region. The only logical way is to wait for the conservation measure (the large marine park to be established by the Airport Authority) to become effective with the dolphins coming back first, and only then the government can properly assess how the LKT reclamation will affect the dolphins. Any deviation from the current plan would be disastrous and also seriously hamper the dolphin usage in North Lantau region. The large-scale reclamation at LKT would also completely ruin the effectiveness of this large marine park established for "compensation" of the massive habitat loss for the dolphins. Such serious consequence would be very similar to the damage that the third runway reclamation has done to the Brothers Marine Park. Such marine park was established in 2016 as the compensation measure for the Hong Kong Boundary Crossing Facilities with the associated reclamation near the important dolphin habitat around the Brothers Islands. Now that the construction is over for several years, but the dolphins have never utilized this marine park with extremely rare occurrence in the past five years.

We also want to add that the night-time usage of LKT was assessed by CEDD at a time when the dolphins were heavily affected by the on-going infrastructure work of HZMB and later the third runway expansion work, so we are critical of such assessment and have to wonder whether such inshore habitat could be very important historically. It should be emphasized that **their data was collected as the worst possible time** which can diminish the true importance of LKT to the dolphins. That may also be the same for the line-transect survey data to determine the importance of LKT area to the dolphins.

Regards,
Hong Kong Dolphin Conservation Society
22 May, 2020

Figure 1. Habitat rating of Chinese white dolphins in Hong Kong using quantitative habitat use information collected during 2001-12 (number within grids represents the sum of scores totaled from 10 section criteria) (Source: *Monitoring of Marine Mammals in Hong Kong Waters (2013-14) Final Report, AFCD*)

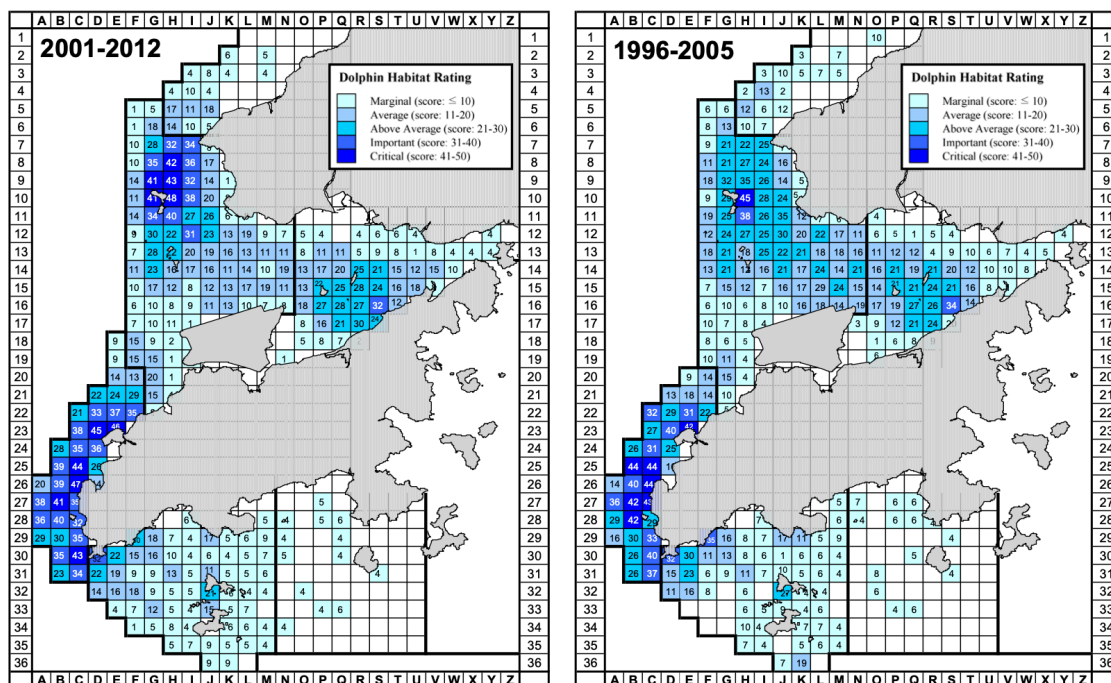


Figure 2. Location of Sha Chau Lung Kwu Chau Marine Park (in blue) and planned Marine Park for the Three-Runway System (in dark green) (Source: *Airport Authority*)

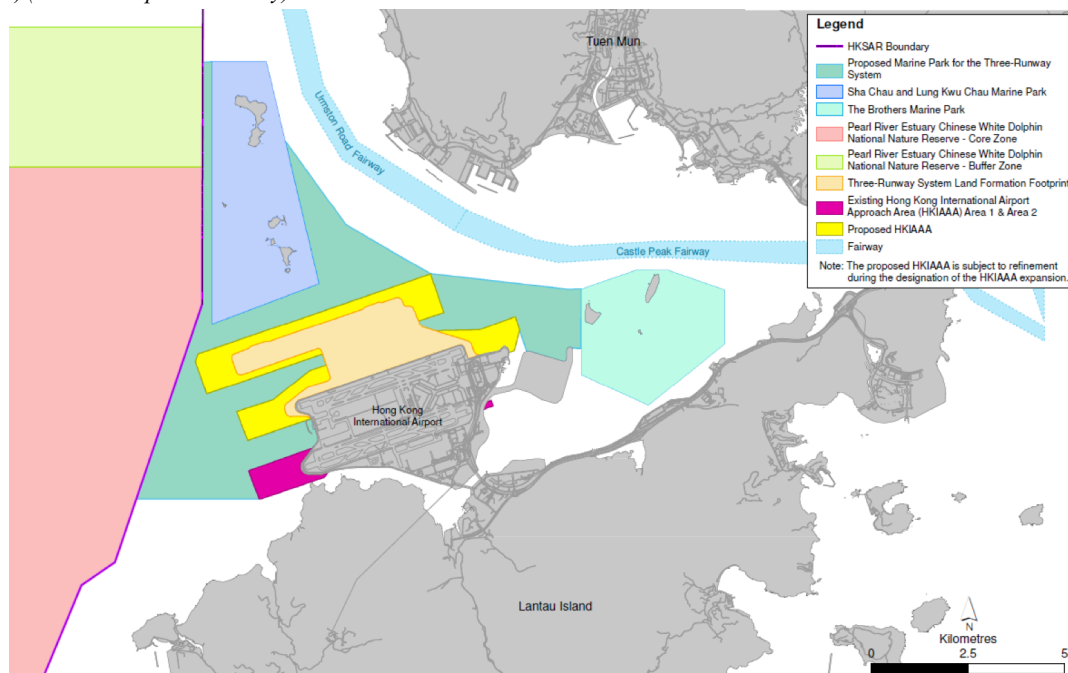


Figure 3. Environmental Impact Assessment report – executive summary of ‘Expansion of Hong Kong International Airport into a Three Runway System’ (Source: EPD)

Expansion of Hong Kong International Airport into a Three-Runway System
Environmental Impact Assessment Report – Executive Summary



5.11.3.11 In addition, the establishment of a new marine park of approximate 2,400 ha by linking the planned BMP and the existing SCLKCMP (**Drawing No. MCL/P132/ES/5-11-001**) is recommended. The total area of this proposed new marine park is much greater than the seabed habitat loss of 672 ha and is expected to significantly improve the conservation prospects for the Hong Kong sub-population of CWDs by mitigating the impacts of habitat loss, habitat fragmentation, changes in patterns of habitat use, as well as minimising the noise and disturbance from marine traffic, specifically HSFs. It should also be noted that the new marine park will be contiguous with the PRE CWD national nature reserve established by the Mainland side, thereby linking the protected habitat between Hong Kong and the mainland. The Administration has made a firm commitment to seek to designate the proposed marine park of approximately 2,400 ha in the waters north of the 3RS project in accordance with the statutory process stipulated in the Marine Parks Ordinance, as a mitigation measure for the permanent habitat loss arising from the 3RS project. AAHK will seek to assist in completing the designation tentatively around 2023 to tie in with the full operation of the 3RS. In addition, environmental enhancement measures have also been recommended to contribute to strengthening marine ecology and fisheries resources in northern Lantau waters. These includes eco-enhancement designs of part of the seawall to facilitate colonisation by intertidal and sub-tidal fauna within the future extended HKIAAA, exploring the feasibility of deployment of artificial reefs, setting up a marine research programme to support conservation of marine ecology, setting up an education programme to provide a platform for local school groups and the general public to learn more about local marine ecology and CWDs, and the promotion of environmental education and eco-tourism. An Environmental Enhancement Fund will be established to support these activities.

5.11.3.12 Through the implementation of the proposed mitigation measures, the potential residual impacts due to the construction and operation of the project would be reduced to levels that are not predicted to cause significant population-level impacts on the PRE CWD population or the Hong Kong sub-population. Similarly, the potential construction and operation phase impacts on marine fauna other than CWDs would also be mitigated to acceptable levels.