

Mr. TONG Chi Keung, Donald, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(E-mail: eiaocomment@epd.gov.hk)



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

By email only

23 October 2018

Dear Mr. Tong,

Comments on the Project Profile for Yuen Long Effluent Polishing Plant (ESB-309/2018)

Given the long construction time required for the proposed development (7 years for Phase 1 and another 4 years for Phase 2), the Hong Kong Bird Watching Society (HKBWS) considers that it is important that all potential ecological impacts of the proposed effluent polishing plant and all concurrent projects are properly identified and comprehensively assessed in order to ensure the proposed development will not have adverse ecological impacts on birds including breeding ardeids, Great Cormorant roosting site and the ecological integrity of the Deep Bay area.



1. Potential adverse ecological impacts on important bird habitats

Shan Pui River, Kam Tin River, Mai Po Marshes SSSI, Mai Po Inner Deep Bay Ramsar Site, Wetland Conservation Area, fishponds, freshwater/brackish water ponds, reedbeds, mangroves and mudflats are important habitats for birds, particularly wintering and migratory waterbirds and wetland dependent birds. Even though the proposed project will be carried out within the existing Yuen Long Sewerage Treatment Works, the construction works would still generate adverse ecological impacts on the above wetland habitats. We are particularly concerned about the noise impacts and human disturbance on the mudflats/intertidal area in Sha Pui River immediately adjacent to the project site, where a lot of waterbirds and wetland dependent birds forage including the globally endangered Black-faced Spoonbill, cormorants, ardeids, ducks, shorebirds and gulls (Figure 1). The area is also a popular birding site in Hong Kong. We consider that all potential adverse impacts should be avoided/minimized.

2. Concerns on the Great Cormorant roosting site

The plantations in Nam Sang Wai (NSW) is a regionally important roosting site for Great Cormorant (*Phalacrocorax carbo*). They gather to roost in the trees at night¹, but some of

¹ Mai Po Marshes Nature Reserve, Nam Sang Wai and Lok Ma Chau Mitigation Wetland are the known

them were also seen using the roosting sites during the day. For the past six years from 2012 to 2017, the maximum percentage of the Deep Bay population that the NSW roosting site supported was over 50% and can even reach up to almost 70%², indicating the importance of the NSW site to the regional population. However, part of this roosting site is within 500 m from the boundary of the project site (and can be as close as just under 300 m from the project site). We consider that all potential adverse impacts (including noise impacts) on the Great Cormorant roosting site should be adequately assessed and avoided/minimized, while the roosting site should be identified as an ESR.

3. Phasing of the construction program and concerns on the breeding ardeids

Besides careful phasing of construction program and avoiding construction works during the winter season when more birds utilizes the immediate surroundings of the project site, measures should also be taken in summer to avoid/minimize disturbance impacts during the breeding season of ardeids (i.e. generally between March and August inclusively). Although the project site is about 3 km away from the Tung Shing Lane egretty which is the second largest egretty in the Deep Bay area, the habitats adjacent to the project site are still within the foraging range of the breeding ardeids³. We consider that egretty flight line surveys should be conducted to identify the foraging areas and flight lines of the breeding ardeids, such that the impacts of the proposed project can be properly assessed and avoided/minimised. The risk of bird collision arising from the project (e.g. noise barriers, solar panels) should also be minimized.

4. Nearby concurrent project

To our understanding, the construction phase of the Yuen Long Barrage Scheme is proposed to be from 2021 to 2029, which completely overlaps with the construction of the current project (i.e. 2020 - 2030). As the two project sites are only approximately 1.2 km apart from each other and they have similar ESRs (such as the Shan Pui River, Great Cormorant roosting site in NSW and the Tung Shing Lane egretty), the Yuen Long Barrage Scheme should also be listed as a concurrent project to avoid the potential adverse cumulative ecological impacts.

evening roosting sites in the Deep Bay area. Evening counts are conducted to get a more accurate information on their wintering population.

² The maximum percentage of the Great Cormorant Deep Bay population that the NSW roosting site supported was found to be in December for the past six years. In December of 2012 to 2017, the number of Great Cormorants roosting in NSW ranged from 2,555 to 5,543, which accounts for 51% to 68% of the Deep Bay population. Data were extracted from the Monthly Waterbird Monitoring Biannual Reports (October to March, from 2012 to 2018) for the Mai Po Inner Deep Bay Ramsar Site Waterbird Monitoring Programmes 2012-18, reported by the Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong Special Administrative Region Government.

³ Local studies reported the foraging distances of breeding ardeids ranged from about 2 to 4 km.

The HKBWS hopes that our comments would be taken into consideration. Thank you for your kind attention.

Yours sincerely,



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

=====

Figure 1. We are particularly concerned about the adverse ecological impacts of the proposed project on the mudflats/intertidal area in Sha Pui River immediately adjacent to the project site, where a lot of waterbirds and wetland dependent birds forage including the globally endangered Black-faced Spoonbill, cormorants, ardeids, ducks, shorebirds and gulls. Photographs taken at Shan Pui River in Nov 2017.

