



額外保育措施效用成疑 三跑環評原地踏步 環團要求環諮會否決

(2014年9月12日新聞稿) 香港地球之友、香港海豚保育學會、長春社以及世界自然基金會香港分會今天舉行聯合記者會，認為三跑環評中多項疑團仍未解決，機管局額外提出的保育措施效用成疑，該環評報告由始至終是原地踏步，沒有足夠的緩解措施避免或減輕對環境生態，特別是對中華白海豚的影響，各環團強烈要求環境諮詢委員會(環諮會)委員否決該份環評報告。

環諮會將於下周一(15日)開會討論機場第三條跑道的環評報告，議決是否向環保署署長建議通過該份環評報告。各環團成員旁聽環諮會轄下環評報告小組(環評報告小組)早前召開的會議，發現委員並未就多項有關空氣、噪音評估的疑點向機管局追問；而機管局及後提出的《保護漁業及海岸生態提升計劃》，其實並非三跑工程的對中華白海豚的緩解措施，保育效用存疑，環團對該份環評報告絕不收貨，以下將詳細說明之。

- 《保護漁業及海岸生態提升計劃》

環評報告小組委員於八月中合共召開三天公開會議，近半數時間用以討論緩解方案能否減低工程對中華白海豚的傷害。直至八月底前，作為項目倡議者的機管局均未能就委員的質疑提交足夠資料，委員於會上亦數次清楚表明不滿機管局的回應。但在九月二日最後一次會議上，小組委員卻因著機管局臨時拋出的一項《保護漁業及海岸生態提升計劃》，態度上對環評報告作出 180 度改變，並突然宣佈傾向建議通過該環評報告。

機管局表明該《保護漁業及海岸生態提升計劃》不屬於三跑環評的「緩解措施」，只屬額外資料(additional information)。機管局在長達四十頁的計劃中提出將出資支持一系列研究及保育海洋生態的項目，令人花多眼目，但實際有效的海豚保育措施，尤其是針對七年施工期間所帶來的海豚棲息地損失，卻乏善足陳，並未能對症下藥。環團對該計劃之詳盡分析可參考新聞稿之附錄(Appendix)，在此簡述幾項要點：

- 雖然機管局希望透過設立「生境提升地點」以減緩船隻航行(特別是高速船、工程船)對中華白海豚的影響，但卻刻意在一些原先並未有太多船隻航行的水域設立這些「生境提升地點」，反而迴避在一些海豚較受影響的地方加以保育，因此該措施對海豚保育而言形同虛設；



- 儘管計劃不斷吹噓，透過投放人工魚礁及放魚苗等措施以增加漁業資源、繼而惠及中華白海豚，但香港權威漁業專家均認為，多年來並未有任何科學數據確立這些措施的成效，甚至還有機會帶來負面影響。由於中華白海豚的生境並不屬於礁類生境，而且其覓食的魚類亦不會依賴魚礁(例如黃花魚)，因此投放人工魚礁不單未能為海豚帶來更多的食糧，反而會霸佔海床生境，影響海豚覓食機會。再者，投放魚苗亦會帶來一系列的惡果，有可能令漁業資源受到負面衝擊。事實上，漁業專家亦曾勸阻機管局提出此措施，可見機管局為急於求成，忽視專家意見，以求「湊數」蒙混過關。

環團一直認為，機管局在海豚保育問題上應採取「先保育、後破壞」，即在工程展開前，在施工範圍附近的海豚重要生境先設立保護區(例如將沙洲及龍鼓洲海岸公園向南延伸至大澳一帶水域)，讓海豚在漫長施工期間不至流離失所。

雖然在環評報告小組最後一天會議前夕，漁護署「巧合」地公佈重新啟動擱置十多年的「西南大嶼山海岸公園」及「索罟群島海岸公園」的設立，但署方、環境局、機管局及環評報告小組均極力否認新海岸公園的設立與三跑環評報告有任何關係。因此，機管局至今仍未能就七年施工期間所帶來的海豚棲息地損失，作出任何生境補償，卻試圖利用《保護漁業及海岸生態提升計劃》，誤導公眾以為問題已解決，並作為環諮會的「下台階」。

- 空氣評估

環評報告中多項關於空氣質素的疑團，機管局在環評報告小組委員的提問下，並沒有充分交代細節，試圖「矇混過關」。

環評報告須預測 2031 年機場附近的易受空氣污染影響地方(Air Sensitive Receivers, ASRs)的污染物濃度。機管局曾委託顧問公司於 2010 年進行研究，該報告預測東涌及沙螺灣的二氧化氮年均濃度均超出空氣質素指標(40 微克／立方米)的標準。在環評報告正式公佈前，機管局亦曾多次向傳媒/環團簡介環評報告的進展，其中在 2013 年 6 月的簡介會中表示屯門地區的二氧化氮年均濃度是「介乎達標與不達標」(Marginal)的水平，但在 2013 年 12 月的簡介會上，機管局卻突然預測該地區的二氧化氮年均濃度變為「達標」(Compliance)。而在最後公佈的環評報告中，所有易受空氣污染影響地方的污染物濃度亦已變成「達標」。



在環評報告小組會議期間，機管局並無仔細解釋為何預測結果會由「超標」/「介乎達標與不達標」變為「達標」，只嘗試以「一切以環評報告內容為準」輕輕帶過，而委員亦無嘗試向機管局追問這疑點重重的情況，要求公開所有原始數據，便讓其「朦混過關」。

表一：2031年二氧化氮年均濃度（微克／立方米）

地區	Air Quality Review for Hong Kong International Airport (2010年)	三跑環評報告 (2014年)
東涌	42.0	31
沙螺灣	44.1	36

表二：2031年二氧化氮年均濃度達標情況

地區	機管局就三跑環評進行的第七次傳媒工作坊 2013年6月	三跑工程進展簡介 2013年12月
屯門	Marginal	Compliance

註：

[1] 空氣質素指標二氧化氮年均濃度為 40 微克／立方米

總結

基於現時對中華白海豚的保育仍然不足，以及環評報告中多項疑點仍未獲充分解釋，我們對該份環評報告絕不收貨，並強烈要求環境諮詢委員會(環諮會)委員否決該份環評報告。

傳媒查詢：

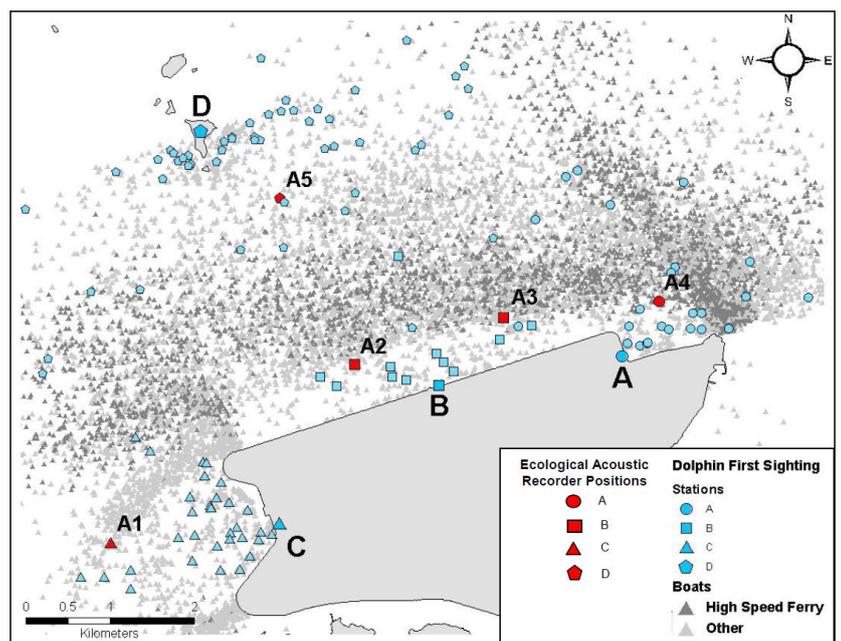
香港地球之友環境事務主任 陳錦卓 2528 5588／9872 6977

Appendix. Main issues with the additional marine habitat enhancement during construction phase of 3RS project, according to MEFEP (Chapter 4)

Several marine habitat enhancement measures have been suggested in the Plan for dolphin protection during the construction phase. However, such measures are largely inappropriate and inadequate to address the critical issue of massive habitat loss to the Chinese white dolphins and overall marine ecology, which are discussed below in details:

1. The enhancement plan suggests that areas within North Lantau waters can be targeted as “potential habitat enhancement areas” during construction phase, well in advance of marine park designation. These areas include the embayed areas in waters (between HKIAAAA) west of HKIA (about 430 hectares). The suggested measures to be implemented include: 1) restrict Sky Pier high-speed ferries (HSFs) and construction vessels from entering into this enhancement area; 2) develop and work to implement various conservation and fisheries enhancement measures such as deployment of artificial reefs and restocking of fish fry.

- According to the 3RS EIA report (see figure on the right), the waters to the west of HKIA (i.e. the enhancement area) have low marine traffic to begin with, so no real enhancement of marine habitat would be resulted with the restriction of Sky Pier HSFs as those ferries never occur in this area in the first place. For construction vessels, the EIA report also indicated that their traveling route would not overlap with this enhancement area, and those vessels have other options to travel as well. On



the other hand, there are other areas outside of proposed work area that would have more needs for vessel traffic management, but was not considered for habitat enhancement or other protection. If the protection measure is aimed to reduce the impacts of marine traffic, it should be designated in areas with high commercial marine traffic in order to have some actual enhancement effect.

- The effectiveness of suggested measures on artificial reef deployment and fish fry restocking to enhance fish stocks have yet to be scientifically proven to be applicable in the Hong Kong context, and local fisheries experts are doubtful that they will be effective due to the following reasons:

Deployment of Artificial Reefs (ARs)

Artificial reefs are used or intended for:

- Physical barriers to trawling (Taiwan is a good example);
- Recreational activities, i.e. attraction of fish for recreational fishing or for divers (note: Fish Aggregation Devices (FADs) are another kind of artificial structure that attracts fish to increase ease of fishing in pelagic areas);
- Habitat restoration – to replace lost reef habitat or increase reef habitat in areas where reef habitat is a limiting factor for recovery (e.g. Hong Kong)

The Plan repeatedly suggests that AR deployment could be used to promote fisheries resources recovery as one of the habitat enhancement measures. Technically, in relation to habitat restoration, there is no evidence that in the context of a marine environment such as Hong Kong's AR can work because:

- Hong Kong's fishery is recruitment limited (i.e. not enough reproductive adults to produce enough young to recruit). In other words, the problem in HK is NOT habitat limitation but growth and recruitment overfishing. So ARs are entirely inappropriate for purpose.
- Concentrations of fish were reported around ARs; however, these fish likely is being attracted and concentrate from other areas, so there may have no net gain in fish stock – it is just an illusion that the ARs work. This is a global discussion and interest in ARs is waning as a result of unproven benefits.
- ARs are expensive and have not been shown to restore habitats, or fisheries in Hong Kong despite a 20 year history and millions of HK dollars being spent. The AR programme is evidently completely unaccountable in terms of effectiveness and financial viability; the programme merits a thorough audit. It has demonstrated no net economic or biological benefit. Fishermen in HK fish on ARs and do not recognize any benefit from them (according to LegCo discussion).
- Artificial reefs mainly concentrate on the remaining resource and the potential enhancement effect is, in general, considered quite low (FAO comment on AR: In terms of habitat rehabilitation, artificial reefs have little, if any, success as they only concern a limited area¹).

Releasing of Fish Fry

- In general, releasing fish fry, even 'native' species, could create problems, such as the homogenisation of the genetic structure of the species, increasing the ecological burden on the receptor site (e.g., more food will be required for the released fishes), and the introduction of disease.
 - In addition, the identity of many released species would still be problematic. The practice may also introduce exotic species, as sometimes exotic species will be accidentally released with the 'native species' (some may be mixed with the native or look alike with the native). Moreover, it would not be possible to release fish fry originated from Hong Kong since no local fish farms produce fish fry, and many of these fry are usually from mainland Chinese/Taiwanese fish farms. Therefore, the
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genetic structure would already be completely different to the sub-population in Hong Kong. In fact, fish fry release as a conservation tool is thought to be a very outdated concept overseas due to the potentially arising problems as mentioned above.

- The Plan did not specify how advance the proposed measure will be implemented during construction phase, and all these measures are only optional without firm commitment to be delivered. Specific timeline of implementation and management targets during construction phase are not well explained. Moreover, as the assistance from various government departments, as well as the agreement with stakeholders such as fishermen are critical to implement most of those measures, which are out of control of AAHK, firm commitment from the various involved parties should be confirmed before the enhancement plan is endorsed by ACE and EPD.

2. The enhancement plan also suggests that the Southwest Lantau waters can be enhanced by implementing enhancement measures including AR deployment and fish fry restocking.

- The measure appears to be out of place without any explanation on why only the marine habitats in Southwest Lantau need to be enhanced, but not the rest of West Lantau waters, or other part of the dolphins' range (especially the important dolphin habitats identified in AFCD studies).
- As mentioned above, the only enhancement measures including AR deployment and fish fry restocking would not be beneficial to Chinese white dolphins at all. No other effective measures have been suggested besides the enhancement of fisheries resources.

3. The enhancement plan suggests providing assistance on the enforcement of regulations in Sha Chau and Lung Kwu Chau Marine Park (SCLKCMP) by deploying observers as surveillance on voluntary basis in order to support the protection of CWDs in existing marine park. It also suggest to assist the dolphin stranding response and education programme by regular patrol to identify dolphin injury cases and shorten the response time to rescue dolphin or retrieve dolphin stranded carcasses.

- These suggested measures are non-relevant to habitat enhancement, which is the main goal of Chapter 4 in addressing the construction phase habitat loss to the dolphins. It is puzzling that the more effective protection measures adjacent to SCLKCMP as suggested in Chapter 3 are not being suggested here at all within the SCLKCMP in Chapter 4. Moreover, the effectiveness of such surveillance within the marine park is highly questionable, as it is impossible for AFCD patrol staff to respond immediately to the surveillance report and enforce the law unless they are stationed in the area all the time. The plan also implies that the current surveillance by marine park staff is inadequate, and this issue should be issued by AFCD as their responsibility, but not through AAHK.



Besides the abovementioned issues with the suggested enhancement plan, the Plan also does not propose any measure to address the unpredictable impact and disturbance brought by high volume of marine traffic to the dolphins. During the peak construction time for reclamation (2016/17), the maximum vessel movement will be 120 per day, and 120 stationary vessels will be located within the works area. Together with the traffic contributed from other vessel types, intensive movement of more than 400 vessels will be expected in the vicinity of Project Area daily. Even though the project proponent will pose speed restriction to the work vessels and Sky Pier HSFs in the low-conflict area, the huge amount of marine traffic will inevitably pose impacts to the dolphins using the water areas.