



世界自然基金會
香港分會

WWF-Hong Kong

香港新界葵涌葵昌路 8 號
萬泰中心 15 樓
15/F, Manhattan Centre
8 Kwai Cheong Road
Kwai Chung, N.T., Hong Kong

電話 Tel: +852 2526 1011
傳真 Fax: +852 2845 2764
wwf@wwf.org.hk
wwf.org.hk

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

19 November 2020
(By post and e-mail)

Dear Sir/Madam,

**Re: Finance Committee Meeting on 20 November 2020, agenda item
#VII “768CL Studies related to artificial islands in the Central Waters”**

WWF-Hong Kong (WWF) objects to the proposed reclamation and reaffirms our position that reclamation is no way to treat our earth and ocean. We need a vision for Lantau’s tomorrow that preserves the natural wealth of Lantau today, for future generations. Unbalanced development can profoundly alter the natural environment and degrade its value as a recreation, ecotourism, and rural living hotspot, as well as a refugia for many threatened wildlife and plant species of Hong Kong. For these reasons, we argue that minimal or no development may be most beneficial for future generations. Three alternative solutions are at hand:

1. Develop brownfields for housing rather than pursue reclamation

Hong Kong has extensive brownfields which should be rehabilitated and developed for the same purposes, with similar benefits for economic development but at much lower cost than reclamation to the Hong Kong taxpayers. The Planning Department has published a brownfield study last year, with a conclusion that there are 7,373 active brownfield sites covering 1,414 hectares in the New Territories. Earlier this year, 8 clusters of brownfield sites, totalling 36 hectares, have been identified by the Government as possible areas for the development of more than 20,000 units of public housing. However, data released by the Liber Research Community in 2018 has shown that 723 hectares of sizeable brownfield areas are available for public housing development that can potentially provide 84,000 residential units. The government

together possible™

贊助人：香港特別行政區行政長官
林鄭月娥女士、大紫荊勳賢、GBS
主席：何聞達先生
行政總裁：江偉智先生

義務核數師：香港立信德豪會計師事務所有限公司
義務公司秘書：嘉信秘書服務有限公司
義務律師：孖士打律師行
義務司庫：匯豐銀行
註冊慈善機構

Patron: The Honourable Mrs Carrie Lam Cheng Yuet-ngor, GBM,
GBS
The Chief Executive of the HKSAR
Chairman: Mr Edward M. Ho
CEO: Mr Peter Cornthwaite

Honorary Auditors: BDO Limited
Honorary Company Secretary:
McCabe Secretarial Services Limited
Honorary Solicitors: Mayer Brown
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

should explore options using feasible brownfield sites to increase housing, instead of reclamation that will damage valuable natural resources and preclude sustainable growth options in the future.

2. Fix the loopholes in South Lantau ordinance's that permit unregulated filling in and destruction of wetlands and coastal forests

The rapid loss and degradation of Lantau Island's coastal lowland wetlands, streams, and riparian and coastal forests must be stopped if the coast's natural values are to be maintained into the future. The Government must confer adequate protections to vulnerable natural habitats and implement environmentally balanced land use zoning and effective enforcement. Currently, loopholes in the Town Planning Ordinance and Waste Disposal Ordinance allow for filling in of wetlands and clearing of woodlands in the conservation-related zones. These actions threaten native species and rare habitats and will increase the risk of flooding to settled areas and recreation zones. South Lantau should embrace the Ridge to Rocky Reef approach to managing its watersheds, whereby functionally important natural habitats along the coast and streams are well protected to enable them to help sustain healthy ecosystems and retain high quality natural environments for recreation, rural living, and fisheries. This also follows the government's overarching principle "Development in the North, Conservation for the South".

3. Establish a conservation area for dolphins along the southern and southwestern coast of Lantau.

The coastal marine environments of Lantau Island require enhanced protection. These coastal waters have been identified as one of the few remaining critical habitats for the endangered Chinese white dolphin according to the [2020 Emergency Action Plan](#). Frequent marine traffic along shipping lanes off southern Lantau has been found to increase the risk of ship strike and underwater noise disturbance to local cetaceans. A development-free Dolphin Conservation Management Area should be designated by 2024 to protect critical dolphin feeding and socialising habitats in southern and southwest Lantau, and to better regulate coastal development, boat traffic, fishing, and other human activities for the recovery of the dwindling dolphin population throughout the Pearl River Delta.

Lantau Today is our natural treasure with inestimable value, which will only decline if the planned reclamation proceeds and the loss of natural coastline continues at its current rapid pace. Protecting the natural wealth of Lantau Island today will also help Hong Kong fulfil its commitment to its Biodiversity Strategy and Action Plan (BSAP) and the Convention on Biological Diversity (CBD) which will be hosted in Kunming next year. It's time for the government to take finding the balance between development and conservation seriously, by protecting Hong Kong's natural landscapes and seascapes in building a New Normal for the city during the green recovery from COVID.

Yours faithfully,



David Olson, Ph.D .
Director of Conservation
WWF-Hong Kong



Laurence McCook, Ph.D.
Head of Oceans Conservation
WWF-Hong Kong

c.c. Secretary for the Environment, Wong Kam Sing, GBS, JP
Secretary for Development, Wong Wai Lun, Michael, JP



世界自然基金會
香港分會

WWF-Hong Kong

香港新界葵涌葵昌路 8 號
萬泰中心 15 樓
15/F, Manhattan Centre
8 Kwai Cheong Road
Kwai Chung, N.T., Hong Kong

電話 Tel: +852 2526 1011
傳真 Fax: +852 2845 2764
wwf@wwf.org.hk
wwf.org.hk

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

15 July 2020
(By post and e-mail)

Dear Sir/Madam,

**Re: Finance Committee Meeting on 17 July 2020, agenda item
#VI “768CL Studies related to artificial islands in the Central Waters”**

We understand the above captioned will be discussed during the meeting of the Finance Committee on 17 July 2020.

WWF considers a more balanced approach possible, where people and nature can thrive, with “brownfield first” development as this is a better solution for land supply. Reclamation is accepted to be an environmentally disastrous and costly approach to provide land supply. WWF urges that rather than resources being invested in impact studies related to the East Lantau Reclamation, Lantau Island and its waters are well conserved and managed holistically with thriving wildlife, wetlands, nearshore waters to assure people benefit from a high quality of life and enhance nature-based economic opportunities.

The proposed reclamation site contains important marine biodiversity. Studies show at least 14 species of octocoral and black coral and 21 species of hard coral in east Lantau Island waters¹. WWF has been closely monitoring the marine ecological status and conducted several underwater ecological surveys in that area. Rare marine species, such as the spotted seahorse (*Hippocampus kuda*), pipefish (*Trachyrhamphus* sp.) and sea pen (*Virgularia* sp.) were found during recent WWF underwater surveys. These

¹ Oceanway Corporation. 2018. unpublished data

together possible™

贊助人：香港特別行政區行政長官
林鄭月娥女士, 大紫荊勳賢, GBS
主席：何聞達先生
行政總裁：江偉智先生

義務核數師：香港立信德豪會計師事務所有限公司
義務公司秘書：嘉信秘書服務有限公司
義務律師：孖士打律師行
義務司庫：匯豐銀行
註冊慈善機構

Patron: The Honourable Mrs Carrie Lam Cheng Yuet-ngor, GBM, GBS
The Chief Executive of the HKSAR
Chairman: Mr Edward M. Ho
CEO: Mr Peter Comthwaite

Honorary Auditors: BDO Limited
Honorary Company Secretary:
McCabe Secretarial Services Limited
Honorary Solicitors: Mayer Brown
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

marine species need protected and well-managed habitats to continue to survive and thrive in Hong Kong waters.

In addition, the Chinese white dolphin (*Sousa chinensis*, CWD) is being displaced due to large-scale developments in north and northwest Lantau leaving south and west Lantau waters as critical remaining habitat for this iconic species. The proposed reclamation works will reduce the integrity of critical dolphin habitat, which is already naturally limited in distribution. Changes in water flow dynamics from proposed works are also likely to compromise the quality of key dolphin habitat nearby. Ongoing surveys indicate that east Lantau Island waters could potentially be important habitat for the vulnerable finless porpoise (*Neophocaena phocaenoides*)². The construction of large-scale reclamation dramatically increases underwater noise levels, potentially disturbing cetacean behaviour and damaging the hearing of cetaceans, making it difficult for dolphins and porpoise to navigate, forage, and communicate. Along with habitat loss and deteriorated water quality, this is a major threat to both cetaceans.

Rather than embarking on impact studies related to artificial islands in the Central Waters and any future reclamation we advise Government to implement the ‘*CWD Emergency Action Plan*’ where marine scientists across 15 organisations have come together to provide a plan and identified south and west Lantau Island coastal waters as core dolphin conservation zone. To ensure these threatened dolphins have a future in Hong Kong waters, we strongly urge the government to immediately implement such zoning with management of construction impacts, vessel traffic activities, fishing impacts, and water and noise pollution.

There is a high likelihood of severe negative terrestrial ecological impacts of reclamation on the surrounding islands, especially on Sunshine Island, which is a “Site of Special Scientific Interest” designated by the government for conserving the IUCN “Endangered” Bogadek’s burrowing lizard (*Dibamus bogadeki*). Hong Kong is the only location in the world for this lizard, known to occur only on three islands: Sunshine Island, Hei Ling Chau, and Shek Kwu Chau. Since the reclamation project locates very close

² Sea Mammal Research Unit (Hong Kong). 2019. unpublished data

to Sunshine Island, it has a high potential to bring large numbers of invasive species, such as feral cats and rats, to the islands that will prey on these endangered lizards.

Hong Kong has a responsibility under its Biodiversity Strategy and Action Plan and through its obligations as a signatory to the Convention on Biological Diversity to ensure that unique and endangered species are properly protected. In addition to the environmental costs of reclamation as stated above, the potential community impact should be looked into. The area within and around the proposed reclamation is an important fishing ground for local capture fishermen, especially during windy weather as the waters within and around the proposed reclamation remain relatively calm.

The Government in planning a post COVID-19 economic recovery is well placed to make this a green recovery emphasising “brownfield first” development aligned to the United Nation Sustainable Development Goals and fulfilment of obligations under the Paris Agreement, so as to protect the naturalness of Lantau Island and surrounding coastal waters and achieve development that is harmony with nature.

Yours faithfully,



David Olson, Ph.D .
Director of Conservation
WWF-Hong Kong



Laurence McCook, Ph.D.
Head of Oceans Conservation
WWF-Hong Kong

Encl.

c.c. Secretary for the Environment, Wong Kam Sing, GBS, JP
Secretary for Development, Wong Wai Lun, Michael, JP