



世界自然基金會
香港分會

WWF-Hong Kong

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Dr. CHUI Ho Kwong, Samuel, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Email: eiaocomment@epd.gov.hk)

By email only

Dear Dr. Chui,

**RE: Smart and Green Mass Transit System in East Kowloon
(EIA-317/2025)**

WWF would like to provide the following comments and recommendations to the captioned EIA report (hereafter referred to as the Report) on the proposed Smart and Green Mass Transit System in East Kowloon (the Project).

Capture and translocation of freshwater invertebrate species and amphibian of conservation importance that are subject to unavoidable direct loss

Two freshwater crab species of conservation importance—*Cryptopotamon anacoluthon* and *Nanhaipotamon hongkongense*—will be directly affected by the Project. Capture and translocation are recommended for both species. To avoid residual impacts and ensure no loss of species of conservation importance, we recommend conducting pre-construction surveys focused on locations where these crabs were previously recorded within the Project area. If their presence, or that of other freshwater invertebrates of conservation importance are confirmed, a detailed translocation plan outlining the methodology for capture and relocation to suitable receptor sites will be required. The selection of receptor sites—particularly in relation to potential future development—and the capture-release process should be carried out by a qualified ecologist with relevant experience.

Lesser Spiny Frog (*Quasipaa exilispinosa*) and Short-legged Toad (*Megophrys brachykolos*) were also recorded during the survey. While the Lesser Spiny Frogs were scattered across watercourses (Figures 8.5b, 8.5d, and 8.5e), one record of the Short-legged Toad had been found (Figure 8.5d and Appendix 8.8). Should either species—or other less mobile amphibians of conservation importance be confirmed in pre-construction surveys, a capture and release approach should be

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adopted. The scope of translocation must include both adults and tadpoles, and surveys should be conducted at night during the wet season to maximise capture success. Similarly, preparation of a Translocation Proposal, receptor site screening, and the capture-release process should be undertaken by a qualified ecologist with relevant experience.

Quantifiable data to support the environmental and social benefits are missed

We welcome the Project Proponent to adopt Electric Mass Transit (the System) because it offers environmental benefits and addresses growing transportation needs in the uphill areas of Kwun Tong. The System will use electric power, which improves air quality and reduces noise pollution compared to traditional road transport, while also being more energy-efficient. However, the Report only provides descriptive information for such benefits "*...with the anticipated increase in support of transit system and reduction in the overall road traffic volume through providing a more convenient, time-saving and easily accessible transport option proposed by the Project, there would be improvements in air quality, road traffic noise and the overall quality of the ambient environment...*" (Please see 2.2.1 of the Report) of which is lacking hard data to support with. Without quantifiable data, it's hard for the public and even the Project Proponent him/herself to verify the claimed advantages of the Project such as improved efficiency and to assess its potential long-term impacts. We humbly ask for the Advisory Council on the Environment (ACE) to request the Project Proponent to provide numerical data such as the percentage of emissions reduced, noise reduced etc while also being more energy-efficient, mobility improvement when comparing the electrically-powered system to conventional road transport.

Thank you very much for your kind attention and consideration.

Kind regards,



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