



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

23 Mar 2026

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: Development of the Eastern Connection Road
(EIA-320/2025)**

WWF would like to provide the following comments and recommendations to the captioned EIA report (hereafter as EIA Report) on the proposed development at Ma Tso Lung areas (the Project).

Impacts to recognised biodiversity hotspot and associated at-risk species

The Project is located within the globally-recognised **Inner Deep Bay and Shenzhen River Catchment Area Key Biodiversity Area (KBA)**¹ and **Important Bird Area (IBA)**², which support a wide range of wetland-dependent species, of which many are globally-threatened. In addition, WWF-Hong Kong, in association with a group of local experts, published a report titled “**The State of Hong Kong Biodiversity 2025**” in March 2025, together with the “**Hong Kong Terrestrial Biodiversity Hotspot Map 2025**”³ (hereinafter as **the Report**). The Report concluded that 26% (232 out of 886) of the assessed terrestrial and freshwater species in Hong Kong are at risk of local extinction. The Report also identified a total of 27 biodiversity hotspots in Hong Kong, one of which is the “Inner Deep Bay”.

The Project will interfere directly and indirectly with the KBA and IBA, as well as the “Inner Deep Bay” hotspot identified in the Report. With the richest bird diversity and abundance across Hong Kong, this hotspot ranks top among all 27 hotspots. Data and information from our expert group have shown that the “Inner Deep Bay” hotspot support at least **158**

¹ <https://www.keybiodiversityareas.org/site/factsheet/16078>

² <https://datazone.birdlife.org/site/factsheet/inner-deep-bay-and-shenzhen-river-catchment-area>

³ <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

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species of High or Moderate Risk of local extinction, including the highly threatened Eurasian Otter (*Lutra lutra*).

While WWF is pleased to see that the Report has been referenced in this EIA Report for presentation of the ecological baseline conditions and evaluation of the species' conservation importance, we feel that the conservation significance of some of these at-risk species and their associated habitats were underestimated in the EIA Report. For instance, the grassland/shrubland habitat mosaic, where over 60 species of conservation importance were recorded, only received a rating of "low to moderate" ecological value. On contrary, the woodland habitat which is far smaller in extent and supporting only 27 species of conservation importance received a "moderate" rating.

Subsequently, in the EIA Report, the direct permanent loss of 2.88ha of grassland/shrubland was regarded as of low significance, while the direct permanent loss of 1.68ha of woodland is considered to be of moderate significant, and would thus require compensation. Further to that, the woodland compensation site is located on an existing grassland/shrubland area, meaning that further loss of this threatened wildlife habitat would occur.

"The State of Hong Kong Biodiversity 2025" report already stated that open country habitats including grassland and shrubland are rapidly diminishing in the territory, leading to the drastic decline of many species dependent on this habitat type. Our view is that, despite citing the WWF Report, the overall impacts to open country at-risk species and their habitat have not been thoroughly considered and addressed in this EIA process, and that no specific measures have been proposed to mitigate these impacts.

Eurasian Otter

With recent records of Eurasian Otter in the nearby area, we strongly recommend the Project Proponent conduct thorough pre-construction surveys for otters within the Project Site as a precautionary procedure, and construction phase surveys as routine monitoring. Should otters be recorded and/or reliably reported by local residents, specific mitigations should be proposed by the Environmental Team to minimise the impacts to the species during the construction phase. The Project Proponent should also devote effort in preventing hazards of road kills for otters and other animals.

Utilizing natural materials at wildlife crossings for animal usage

The Project proponent proposed a 40m-wide temporary animal overpass to be installed to ensure connectivity is maintained during construction phase. This aboveground wildlife crossing should be vegetated to encourage wildlife use, and will allow access to adjacent habitats. In addition, the two permanent wildlife underpasses in the at-grade section linking the wooded habitat at Tse Koo Hang to the south with wetland habitat at Hoo Hok Wai to the north should also be designed and vegetated in such a way as to avoiding human/feral dogs disturbance during both construction and operational phases, ensuring animals use the crossings safely.

Implementing measures to prevent water pollution in the Deep Bay catchment

The Project Site falls within the Deep Bay catchment and thus any discharge from the development would increase the pollution loading and affect the water quality of the Deep Bay. As such, the Proponent must not discharge surface runoff into the natural/semi-natural/modified watercourses within or near the development site, which are hydrologically connected to the Deep Bay. Surface runoff must be directed into sand/silt removal facilities before discharging into storm drains. Sediments, soil, excavated materials should not be stockpiled in close proximity to any watercourses to prevent runoff during rainstorms. Such conditions should be incorporated into the specifications of the works contract.

Regulating and monitoring disposal operations against eco-vandalism

Given the distance between the development site and several sites of conservation importance and sensitive wetland habitats including the Proposed Hoo Hok Wai Wetland Conservation Park, Wetland Conservation Area, Wetland Buffer Area, "Conservation Area", Priority Site for Enhanced Conservation, Important Birding Area, the Ecological Area, Open Water Compensation Area 2 are within 500 meters, and Hoo Hok Wai is well known as an eco-vandalism blackspot, we recommend that specific "no-go" areas of significant ecological importance, particularly those located adjacent to the project site boundary, be designated with entry restrictions for all dump trucks involved in waste transportation and disposal under the Project. This measure aims to protect sensitive habitats from illegal dumping and the filling of construction and demolition materials. An automated alarm system should be installed to detect and immediately alert the Proponent if any dump truck enters these restricted areas. Additionally, all dump trucks should be equipped with a Global Navigation Satellite System (GNSS), such as the Global Positioning System or an equivalent automatic identification system, to enable real-time tracking and monitoring of their routes and locations.

Thank you very much for your kind attention and consideration.

Kind regards,

A handwritten signature in black ink, appearing to read 'Tobi Lau', written in a cursive style.

Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF Hong Kong
Tele: 2161 9626