



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

28 April 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,

South Island Line (West)
(Application No. PP-698/2026)

WWF would like to provide the following comment and recommendation to the captioned Project Profile (PP) on the proposed railway scheme “South Island Line (West)” (hereafter referred to as the Project).

Need for Comprehensive Assessment of Alternative Tunnelling Methods and Environmental Implications

According to the PP, the Project Proponent proposes to adopt the drill-and-blast method for tunnelling works beneath Lung Fu Shan Country Park. We urge that the Project Proponent should comprehensively describe the considerations undertaken in exploring various feasible alternative tunnelling methods, including but not limited to the use of Tunnel Boring Machines (TBM), drill-and-break methods, mini- and micro-tunnelling. Such an assessment should cover the sequence of works, worksite size requirements, and worksite locations for the Project, and evaluate the extent to which the proposed method(s) represent applicable, appropriate, and proven technologies under the given site conditions. The Project Proponent should further recommend and robustly justify the best practicable mitigation measures, with a view to avoiding environmental impacts to the maximum practicable extent.

Given that the drill-and-blast method may generate comparatively greater environmental disturbances—such as ground-borne noise, ground vibration, potential groundwater contamination, and dewatering of surface waters—which could adversely affect local habitats, flora, and fauna, we strongly recommend that the Project Proponent give serious consideration to adopting Tunnel Boring Machines for the tunnelling works. The use of TBMs would be more conducive to avoiding or minimising disruptions to the sensitive ecosystems within Lung Fu Shan Country Park.

together possible™

贊助人：中華人民共和國
香港特別行政區行政長官
李家超先生, 大紫荊勳賢, SBS, PDSM
主 席：白丹尼先生
行政總裁：黃碧茵女士

核數師：富睿瑪澤會計師事務所有限公司
公司秘書：嘉信秘書服務有限公司
義務司庫：匯豐銀行
註冊慈善機構

Patron: The Honourable John Lee Ka-chiu, GBM, SBS, PDSM
The Chief Executive, Hong Kong Special Administrative Region
People's Republic of China
Chairman: Mr Daniel R Bradshaw
CEO: Ms Nicole Wong

Auditors: Forvis Mazars CPA Limited
Company Secretary:
McCabe Secretarial Services Limited
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

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