



香港觀鳥會有限公司

THE HONG KONG BIRD WATCHING SOCIETY Limited

認可公共性質慈善機構 Approved Charitable Institution of Public Character

地址：香港九龍彌敦道 480 號鴻寶商業大廈 14 樓

Address: 14/F., Ruby Commercial Building, 480 Nathan Road, Kowloon, Hong Kong

電話 Tel. No.: 2377 4387 傳真 Fax. No.: 2314 3687 電郵 E-mail: hkbws@hkbws.org.hk

Director of Environmental Protection  
Environmental Protection Department  
27th floor, Southorn Centre, 130 Hennessy Road  
Wanchai, Hong Kong  
(Email: eiaocomment@epd.gov.hk)

13 Jan 2010

Dear Director,

**Comments on the EIA report**  
**for Regulation of Shenzhen River Stage 4 (EIA-189/2010)**

The Hong Kong Bird Watching Society would like to give our comments on the EIA report for Regulation of Shenzhen River Stage 4 (EIA-189/2010). We agreed that the project would not have adverse impacts on the environment and biodiversity given mitigation and pollution controls are properly carried out. However, we found a few shortcomings in assessment procedures used by the consultant and would like to discuss them below:

**1. Inadequate temporal coverage of wildlife survey**

The wildlife survey in the EIA report was carried out during August 2009 to January 2010 while night bird survey only covered September 2009 to January 2010 (Section 7.6.2). This is considered inadequate as it doesn't cover the spring migration season of birds (March – May) and peak breeding seasons of bird species in Hong Kong (April-June). Thus, it is likely that the EIA report is under-estimating species occurrence and it could not detect breeding activities of birds. Similar problems of inadequate temporal coverage also apply to other groups of wildlife. Thus it is doubtful whether the EIA report could comprehensively reflect the ecological value of the study area.

**2. Consideration of riparian habitat landscaping**

The EIA report has considered about loss of riparian habitat and provided compensation measures including riparian landscaping. The EIA report has also mentioned monitoring for wildlife especially wetland-dependant birds. These are

highly appreciated and we wish the measures are to be implemented properly. However, the use of exotic species in the landscaping should be studied comprehensively before implementation, in order to avoid introducing threats to native biodiversity.

### **3. Assessment of Cumulative Ecological Impacts not comprehensive**

A section for assessment of cumulative ecological impact has been included in the report (Section 7.12). Although related projects have been included in the section, each project was treated separately when assessing cumulative impacts. This is unfavourable according to the concepts of cumulative impact assessment, in which all related projects should be treated together. Moreover, only brief statements but neither comprehensive nor quantitative assessments of cumulative impacts were included in this section. We worried that the cumulative ecological impacts of developments in the Frontier Closed Area and nearby areas are under-estimated. The change in runoff and water retaining properties resulted from cumulative impact of projects might cause a change in water regime of Shenzhen River, hence affecting the sedimentation properties of the ecologically important Deep Bay mudflats.

We sincerely hope the above comments would be considered by the EPD and we would like the consultant to provide additional information on biodiversity assessment and cumulative impacts. This would also be valuable in enhancing the quality of Environmental Impact Assessments in Hong Kong.

Yours faithfully,

A handwritten signature in black ink that reads "Cheng Nok Ming". The signature is written in a cursive, flowing style.

Cheng Nok Ming  
Conservation Officer  
Hong Kong Bird Watching Society