



長春社 Since 1968

The Conservancy Association

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12th November 2020

Ms. Cheng Mei Sze, Maisie, JP
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By E-mail: eiaocomment@epd.gov.hk

Dear Ms. Cheng,

RE: Comments on Engineering and Technical Feasibility Study for Proposed Extension of Yuen Long Industrial Estate Project Profile

The Conservancy Association (CA) would like to express our concern on the captioned.

Direct loss of diverse habitats and species of conservation importance in the northern part of Project Site

The Environmental Impact Assessment Report (EIA Report) in the Planning and Engineering Study for the Public Housing Development and Yuen Long Industrial Estate Extension at Wang Chau¹ reveals ecological importance of the site. The northern part of the site, mostly zoned as Green Belt (GB), comprises diverse habitats such as seasonally wet grassland, agricultural land, secondary woodland and watercourse. Species of conservation significance, such as Chinese Bullfrog, Reeve's Terrapin, Common Yellow Swallowtail, Scarlet Basker, have been recorded in this area (Figure 1).

We have to highlight that Reeve's Terrapin is Globally Endangered according to IUCN Red List. Chinese Bullfrog is "Class II Protected Species" in China. We also note that Small Snakehead spotted in the upstream section of the watercourse is considered to be locally Near Threatened. With abundant species of conservation

¹ Planning and Engineering Study for the Public Housing Development and Yuen Long Industrial Estate Extension at Wang Chau https://www.thb.gov.hk/eng/popup/wangchau_report_details.htm



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importance within such diverse habitats, the project proponent, however, fails to include them in the Project Profile.

The previous EIA Report once proposed an Ecological Compensation Area (ECA), which is of about 0.05ha in size, to reduce the adverse impact due to the direct loss of suitable habitats for the species of conservation significance (Small Snakehead and Reeve's Terrapin) to an acceptable level². However, we are still very doubtful if such a small ECA would be a good compensation measure to compensate all direct loss of habitats and species of conservation importance in the northern part of the site (Figure 2).

We opine that the project proponent should further explore ways to **avoid and minimize the adverse ecological impacts on the above habitats (and all other ecologically sensitive areas)** in both construction and operation phase. In particular, the project proponent should consider re-designing the developing plan by excluding the northern part of the site to avoid direct ecological loss.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

² See Section 8.7.1.3 of Final Technical Report No.3G (TR-3G) Preferred Option and Technical Assessment – Environmental Impact Assessment Report. Planning and Engineering Study for the Public Housing Site and Yuen Long Industrial Estate Extension at Wang Chau
https://hos.housingauthority.gov.hk/pdf/wangchau_report/EIA_Main_text.pdf



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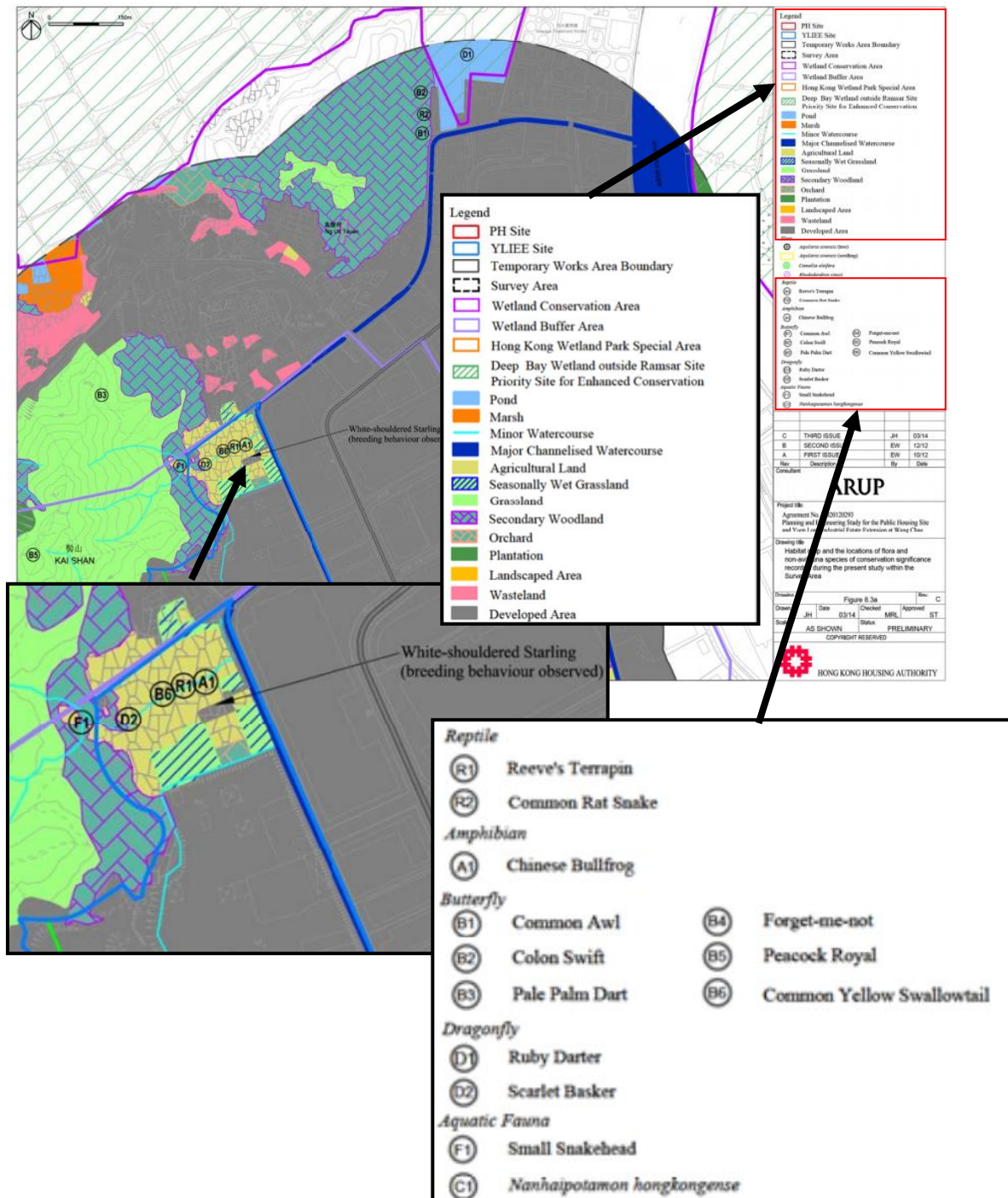
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Figure 1 The habitat map and the locations of species of conservation significance extracted from the previous EIA Report





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Figure 2 Compared the size of the proposed ECA with the area where diverse habitats and species of conservation importance (circled in red) are found, we are very doubtful if such a small ECA would be a good compensation measure

