



長春社 Since 1968

The Conservancy Association

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11th March 2022

Miss Tse Siu Wa, Janice, JP
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

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

Dear Miss Tse,

Comments on Tung Chung Line Extension EIA Report

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

1. Potential hydrogeological change during tunnel construction work

Section 8.9.1.3 mentioned how direct impact on mudflat can be avoided:

“The latest tunnel alignment would run through the bay area of Ma Wan Chung which accommodates mudflats and mangroves that have high ecological value. In order to avoid any direct impacts on these mudflats and mangroves, the design has adopted TBM tunnelling instead of immersed tube tunnelling / open-cut, cut-and-cover tunnelling. By adopting this tunnelling approach, it would not require any marine works such as dredging and temporary reclamation for the tunnelling works in Ma Wan Chung”

We noted that during construction of Express Rail Link in August 2015, slurry from underground pressurized TBM excavation leaked aboveground in Mai Po. Air bubbles could be spotted in adjacent fishponds, while a section of Tam Kon Chau Road was flooded¹. Some green groups have once expressed grave concern on potential water

¹ Hong Kong Bird Watching Society. 13th August 2015. 高鐵米埔鑽地 泥黎湧魚塘 Overflowing of mud caused by Express Rail Works - https://www.youtube.com/watch?v=X197_ukgtco



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pollution and adverse ecological impacts on wetland². We are concerned that potential leakage, similar to the case in Mai Po, would happen during TBM tunneling work in coastal area in Ma Wan Chung and Tung Chung Bay.

In response, Table 2.10 stated that “*Preventive measures such as reservation of adequate soil cover and / or identification and sealing of any likely open path including the charted boreholes would be provided before the TBM passes by*”. Even so, We still hope that the project proponent should provide further information on the following issues:

- Any alternative alignments so that encroachment or damages to sensitive habitats around Tung Chung River-cum-Bay and the coastal village can be avoided
- Hydrogeological impact assessments to reaffirm the geological profile of the project site, and extent of the environmental impacts due to potential hydrology and groundwater level changes, particularly in ecologically sensitive areas
- Monitoring on groundwater level before, during and after TBM tunneling work
- Contingency plan to deal with the above leakage or some other unforeseeable incidents due to potential hydrogeological change during TBM tunneling work

2. Proper protection of plantation affected by Emergency Access Point (EAP)/Emergency Egress Point (EEP)

We have once expressed our concern in commenting Tung Chung Line Extension Project Profile that the project proponent should explore ways to avoid/minimize the adverse ecological impacts due to construction of EAP/EEP. In response, Section 8.7.2.5 mentioned that “*the EAP/EEP has been relocated from Ma Wan Chung to the artificial slope at Shun Tung Road. This has avoided the secondary woodland at Ma Wan Chung. The ecological habitat at the artificial slope at Shun Tung Road is plantation with low ecological value*”.

While the current arrangement can avoid direct impact on all secondary woodland and only cause minor direct impact on plantation at Shun Tung Road, we hope that details

² Mingpao. 8th August 2015. 高鐵路米埔鑽地 泥漿湧魚塘 加壓致裂縫噴漿 港鐵即時填補
http://www.mingpaocanada.com/tor/htm/News/20150808/HK-gaa1h_r.htm



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for protecting trees/vegetation/species of conservation importance affected by EAP/EEP should still be provided.

3. Disposal of construction and demolition (C&D) waste

Similar to other projects, an updated C&D waste management plan should be prepared before commencement of the construction works. We reiterate that the project proponent should propose stringent control and monitoring measures on the construction vehicles/dump trucks to prevent any construction waste dumping on ecologically sensitive area within and adjacent to the project site. For example, construction vehicles/dump trucks should be equipped with GPS devices. Specific transport route should be designated for construction vehicles/dump trucks to ensure proper waste disposal. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the activities of relevant contractors.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association