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Dear Sir,

Comments on the EIA Report
Expansion of Hong Kong International Airport into a Three-Runway System

The Hong Kong Institute of Environmental Impact Assessment (HKIEIA) appreciates the Airport Authority Hong Kong (AAHK) in soliciting public views on the captioned project under the EIAO. Also, it is encouraging to see the great effort that AAHK has spent on assessing the health impact assessment for air quality and operational aircraft noise impacts in the EIA report to address public health concern.

We are eager to see the successful establishment of the proposed marine park for the Chinese White Dolphins (CWD). HKIEIA has been deeply involved in the process of developing Biodiversity Strategy and Action Plan (BSAP) for Hong Kong, as is endeavoured to meet the Aichi Targets under the Strategic Plan for Biodiversity 2011-2020, for implementation of the Convention on Biological Diversity. Target 11 is especially significant. By 2020, at least 17 percent of terrestrial and inland water, and ten percent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes. Currently Hong Kong falls far short of this target, therefore the establishment of the proposed marine park for CWD would be helping Hong Kong to contribute towards meeting this target.

HKIEIA would like to put forward in writing the following views which is not exhaustive based on the EIA Report and wish the EPD of HKSAR could take them in account in the report approval process:

1. ***Air Quality Assessment*** – It was assumed that the government air quality reduction initiatives to be implemented in the next 5-6 years could improve the background air quality, as such, additional impact arising from the 3RS operation should able to achieve the new air quality objective. How can the effectiveness of such initiative be monitored and verified against throughout different stages of the project and what are the contingency plans if any of those initiatives or the background air quality reaches the limit? How would the 3RS operation react in such unfavourable situation to ensure public health would not be impacted?
2. ***Ecological Compensation*** – The EIA report states that the likely ecological impacts of the 3RS could be largely compensated by the establishment of a new marine park covering an area of approximately 2,400 ha in 2023, coinciding with the full operation of the 3RS. It is perceived that the benefits of the new marine park could be impacted if it follows the original plan to be established in 2023 without adequate consideration of ecological

impacts during the construction phase. It is strongly recommended that the legislation establishing the new marine park be prepared and agreed prior to the commencement of works. The document shall include a requirement for reviewing the scope and boundary of the park prior to the future committed enactment date of 2023.

3. ***Ecological Compensation Plan*** – As stated in the EIA report, a total loss of 650 ha of marine water habitat would be resulted permanently because of land reclamation. To be effective, the proposed measures to mitigate the likely ecological impacts shall be carried out with measurable targets and detailed action plans with target species. They build confidence in the effectiveness of the measures. Clear objectives shall be specified for the formulation of appropriate plans for management. Evaluation mechanisms shall also be developed to constantly review the effectiveness of the proposed compensation plans. In an event of failure to meet the proposed targets, contingency plans shall be adopted to prevent the unexpected impacts.
4. ***Improvement on Implementation Schedule*** – The sea area to the north and west to the airport are key habitats for Chinese White Dolphins (CWD). The proposed new marine protection area to compensate the loss of habitat for CWDs, however, is planned to be established after works commencement. It is believed that CWDs might eventually leave their original habitat due to construction disturbance. There is a chance that the species could collapse and as such greater confidence needs to be taken to ensure that this does not occur. It is thereby advised to establish a further marine protection area prior to the commencement of works. (*Note this should not be confused with the area identified above in paragraph 2.*) The implementation schedule and monitoring requirements shall be reviewed with the inclusion of execution period of those mitigation measures for protecting CWDs. Responsible parties for the implementation shall be clearly identified. The timeframe for Environmental Monitoring and Audit (EM&A) measures shall also be incorporated. Should this mitigation prove to be ineffective to the CWD, then a review of the adequacy of the protection measures for the works is required prior to commencement of the works.
5. ***Enhancement of Public Visibility*** – The EIA for 3RS has detailed its EM&A programme under various aspects of assessment. In addition to engaging with the neighbouring communities, for the interest of the wider public, it is suggested to incorporate a 24-hour web camera and project website which provide simplified information on the EIA, helping the public to understand more about the construction of the project and the implementation of relevant mitigation measures.
6. ***Green House Gas Emission*** – It is acknowledged that the assessment of green house gas emission is not required in the current EIA report as it is out of the scope of the EIA Study Brief. The effort of HKAA in conducting an additional assessment on green house gas emission for the EIA is appreciated. Upon the completion of the review, it is advised to make the final report available to the public in response to their concerns and provide regular updates to the project website.

It is our mission and commitment to help building a greener a more sustainable Hong Kong through our professional expertise in technical EIA and EIA specific comments would be raised when the EIA Report is available.

Yours faithfully,

Claudine Lee
Honorary Secretary
for Hong Kong Institute of Environmental Impact Assessment