



## Hong Kong Dolphin Conservation Society 香港海豚保育學會

[PWSC(2019-20)26]

工務委員會：

### 有關土木工程拓展署完成的龍鼓灘填海海豚研究的意見書

我們強烈反對擬建的龍鼓灘填海工程，因工程影響將造成不可接受的環境問題及威脅受保護的中華白海豚（下稱白海豚）。以下更會指出土木工程拓展署完成的「龍鼓灘填海的技術研究」中的問題。

首先，北大嶼山水域在過去二十年一直都是白海豚的重要棲息地，而其中接近龍鼓灘的水域無可否定被認定是**白海豚的重要棲息地**（見圖一），包括爛角咀對開、望后石對開、龍鼓水道（龍鼓灘及龍鼓洲之間）和龍鼓灘相距僅數公里近的沙洲及龍鼓洲海岸公園（見圖二）。故此，今次擬建大型填海工程的龍鼓灘附近及其近岸水域無疑是過往保護白海豚的重要水域。

自港珠澳大橋工程於二零一二年開展，白海豚的數量明顯急跌，創歷史新低（請參考漁護署 2017-18 年及 2018-19 年報告）。不過，按原定計劃，白海豚於北大嶼山的使用率會從大橋「短暫」的影響中恢復過來，可惜這沒有發生，主要因為 2016 年開展的第三條跑道的大型填海工程與龍鼓灘距離不遠。再者，根據原有的第三跑環境影響評估報告（下稱環評、EIA）的「計劃」，香港特區政府對機管局認為海豚在完工後會回來這個評估非法有信心（否則不會通過環評），因為 2023 年完工後，**機管局將會設立一個大型海岸公園（即海洋保護區）作為白海豚棲息地損失的補償方案，為的是吸引海豚使用**（見圖二、三）。這是香港特區認可的計劃，在白海豚棲息地因三跑受大範圍破壞及損失下，進一步保護北大嶼山水域在白海豚。簡單直接來說，就是以後在此大型海岸公園附近的任何破壞海洋環境的填海工程，都將會嚴重影響將來白海豚恢復的機會，而且勢必會令此海岸公園的功能大打折扣、白廢心機。

基於上述，基本上北大嶼山水域沒有空間再討論更多的填海工程（這次是龍鼓灘填海），尤其是靠近白海豚生態敏感區（如沙洲龍鼓洲）這處**白海豚於北大嶼山現時僅餘的一片棲息地**。最合乎邏輯的做法只剩下一個，先等待所有保育措施（機管局的大型海岸公園的設立）落實並有效地令海豚回來，然後政府才能夠適當地檢視龍鼓灘填海對海豚有何影響。任何偏離原有計劃的做法都會造成災難性的影響，及將會嚴重阻礙白海豚運用

北大嶼山水域。這個擬建的大規模龍鼓灘填海計劃，將會完全破壞用來「補償」海豚大片棲息地損失而設的大型海岸公園。此帶來的嚴重後果將會與三跑填海對大小磨刀海岸公園造成的影響非常類似。這個大小磨刀海岸公園位於白海豚的重要棲息地、於 2016 年設立，作為港珠澳大橋香港口岸填海的補償措施，可惜，即使口岸填海工程已完工幾年，過去五年這個海岸公園的海豚使用率依然極低。

我們還想補充一點，土木工程署所進行的龍鼓灘海豚晚間使用率的評估時間，是在海豚被當時港珠澳大橋工程及後來三跑工程嚴重影響下進行的，所以我們對有關評估結果表示不滿，並懷疑龍鼓灘的近岸棲息地對海豚一直以來都非常重要。重申一次，土木工程署在不能再差的時候收集數據，造成低估龍鼓灘生境對海豚的重要性。

香港海豚保育學會 上  
2020 年 5 月 22 日

Figure 1. Habitat rating of Chinese white dolphins in Hong Kong using quantitative habitat use information collected during 2001-12 (number within grids represents the sum of scores totaled from 10 section criteria) (Source: *Monitoring of Marine Mammals in Hong Kong Waters (2013-14) Final Report, AFCD*)

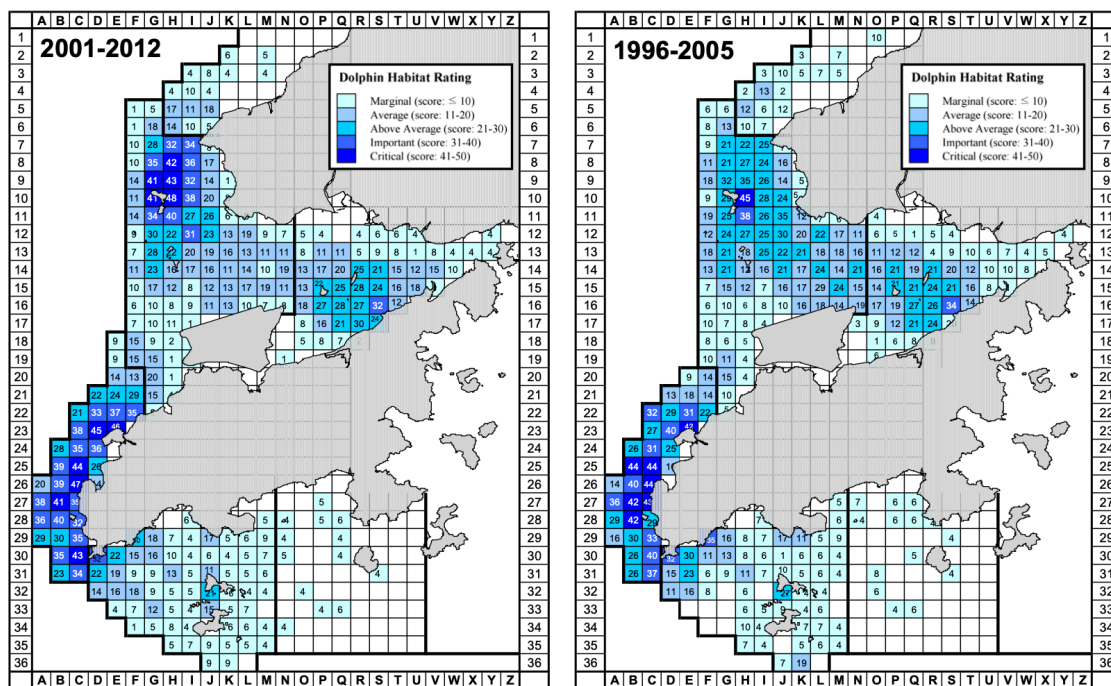


Figure 2. Location of Sha Chau Lung Kwu Chau Marine Park (in blue) and planned Marine Park for the Three-Runway System (in dark green) (Source: *Airport Authority*)

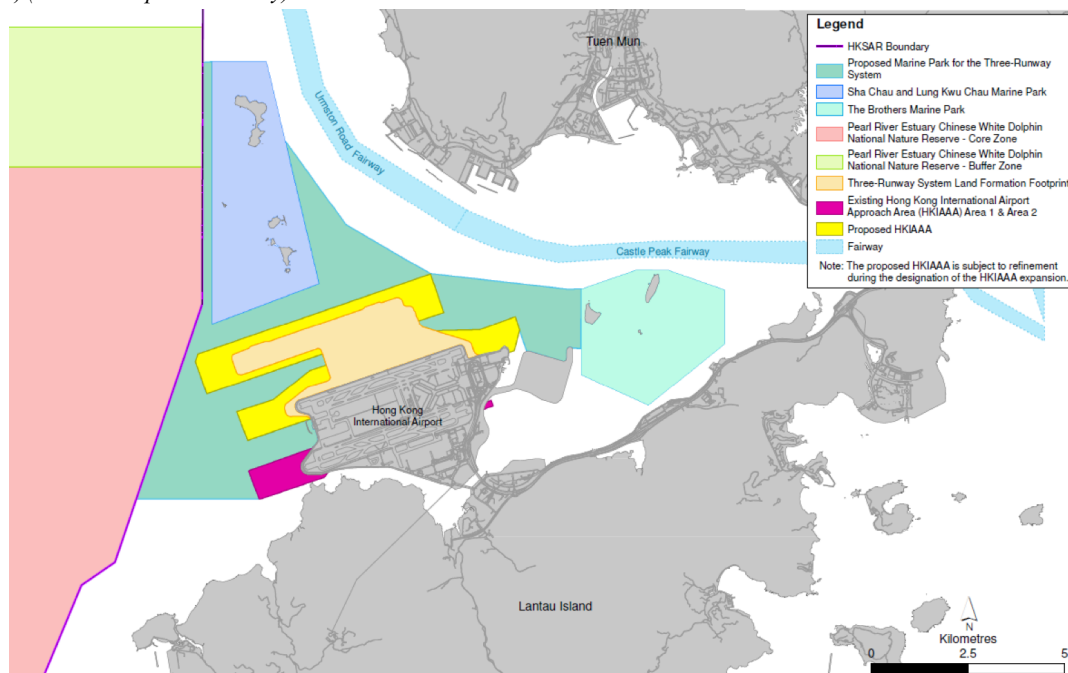


Figure 3. Environmental Impact Assessment report – executive summary of ‘Expansion of Hong Kong International Airport into a Three Runway System’ (Source: EPD)

**Expansion of Hong Kong International Airport into a Three-Runway System**  
Environmental Impact Assessment Report – Executive Summary



5.11.3.11 In addition, the establishment of a new marine park of approximate 2,400 ha by linking the planned BMP and the existing SCLKCMP (**Drawing No. MCL/P132/ES/5-11-001**) is recommended. The total area of this proposed new marine park is much greater than the seabed habitat loss of 672 ha and is expected to significantly improve the conservation prospects for the Hong Kong sub-population of CWDs by mitigating the impacts of habitat loss, habitat fragmentation, changes in patterns of habitat use, as well as minimising the noise and disturbance from marine traffic, specifically HSFs. It should also be noted that the new marine park will be contiguous with the PRE CWD national nature reserve established by the Mainland side, thereby linking the protected habitat between Hong Kong and the mainland. The Administration has made a firm commitment to seek to designate the proposed marine park of approximately 2,400 ha in the waters north of the 3RS project in accordance with the statutory process stipulated in the Marine Parks Ordinance, as a mitigation measure for the permanent habitat loss arising from the 3RS project. AAHK will seek to assist in completing the designation tentatively around 2023 to tie in with the full operation of the 3RS. In addition, environmental enhancement measures have also been recommended to contribute to strengthening marine ecology and fisheries resources in northern Lantau waters. These includes eco-enhancement designs of part of the seawall to facilitate colonisation by intertidal and sub-tidal fauna within the future extended HKIAAA, exploring the feasibility of deployment of artificial reefs, setting up a marine research programme to support conservation of marine ecology, setting up an education programme to provide a platform for local school groups and the general public to learn more about local marine ecology and CWDs, and the promotion of environmental education and eco-tourism. An Environmental Enhancement Fund will be established to support these activities.

5.11.3.12 Through the implementation of the proposed mitigation measures, the potential residual impacts due to the construction and operation of the project would be reduced to levels that are not predicted to cause significant population-level impacts on the PRE CWD population or the Hong Kong sub-population. Similarly, the potential construction and operation phase impacts on marine fauna other than CWDs would also be mitigated to acceptable levels.