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Subject: Opinion on HATS Stage 2

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Opinion on the Consultation Document for Harbour Area Treatment Scheme Stage 2

**1. Do you agree with the preferred option, Option A, centralized treatment at Stonecutter Island?**

*I agree. The land near waterfront area is very valuable, they should be reserved for other land use activities. If the land is occupied by sewage treatment plant, the development potential at its surrounding area will be reduced.*

**2. Do you agree that Stage 2 should be implemented in two phases?**

*Stage 2 of HATS should be phased because phasing can provide higher flexibility.*

**3. Do you agree that protecting the water quality of Victoria Harbour is essential and that it is worth you paying higher sewage charges in line with the “Polluter Pays Principles”?**

*I think this question involve the weighting between Cost and Benefit. The consultation document stated that the total capital cost of the Stage 2 is HK\$19.5 billion and the total recurrent cost is HK\$1.16 billion per year. For the benefits provided by the Stage 2 of HATS, the consultation document identified the following benefits on page 16:*

*Ecological Benefit:*

- 1. maintain healthy marine environment*
- 2. meet future development needs*

*Recreational Value:*

- 1. beaches in Tsuen Wan can be re-opened*
- 2. annual cross-harbour swimming races can be conducted*

*Visual Improvement:*

- 1. the sight of sewage plumes in the Harbour can be removed*

*It should be noted that “treat all wastewater in the Harbour area to a very high level” under the section of “Benefits” should not be identified as benefit brought from the HATS.*

*Before we answer question 3, government should make people clear on the “benefits” the Stage 2 of HATS can bring to Hong Kong..*

*For the marine quality in Hong Kong, the abundance of species is affected by local water pollution or regional water pollution? Any findings showed that water environment for the marine life will have significant enhancement once the wastewater in the HATS catchment is treated by biological treatment? Will the result be the same when the wastewater is treated with lower level of treatment? If the marine water quality in Hong Kong is dominantly affected by the regional water pollution which is caused by the wastewater from Pearl River Delta, the credit for the ecological promotion may not be that high.*

*For the recreational value provided by HATS Stage 2, the wastewater treatment can make reopen of all Tsuen Wan beaches. What are the expected gradings of the beaches? If they only marginally pass criteria being gazetted as beaches, they social value the HATS Stage 2 can bring to us is very limited.*

*It is meaningless that we clean the water up to the drinkable level. HATS should not only aims at improving the quality of water but also the quality of life of people. I think government should address more social benefits the HATS can generate and thus make HATS worth being paid high.*

**Other Comments:**

- 1. There is no clear structure for the consultation document.*
- 2. The consultation document is too technical.*
- 3. This document has explained the options HATS Stage 2A, but no options for the HATS Stage2B.*
- 4. The English and Chinese written skills should be improved.*

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