



其士國際集團有限公司 (CHEVALIER INTERNATIONAL HOLDINGS LIMITED)

16 November 2004

Dr. Sarah Liao
The Secretary for the Environment, Transport and Works Bureau
10/F., Citibank Tower
3 Garden Road
Central
Hong Kong

Dear Dr. Liao,

**Harbour Area Treatment Scheme (HATS) Stage 2
Response to Consultation Document**

We refer to the captioned and have pleasure in enclosing a response on behalf of our group of Companies to your Consultation Document.

Thank you for your attention.

Yours sincerely
For and on behalf of
Chevalier International Holdings Limited

Mr P K Fung
Director

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17 NOV 2004

A response to
“Harbour Area Treatment Scheme (HATS) Stage 2”

Submitted by

Chevalier Group of Companies

INTRODUCTION

The Government of the Hong Kong SAR has issued a Consultation Document for the Harbour Area Treatment Scheme (HATS) Stage 2 in which the Government has listed out his recommendations for this Scheme.

Chevalier, being a group with diversified interests who found its roots in Hong Kong, would like to express its views within this response to this consultation document.

THE BACKGROUND

After the full commissioning of the HATS Stage 1, which provides chemical treatment at Stonecutters Island for some 1.4 million cubic meters of sewage that was previously discharged directly into the Victoria Harbour, in late 2001, the water quality in the harbour has significantly been improved with the exception of the western part of the harbour from where the effluent of the Chemically Enhanced Primary Treatment (CEPT) Plant at Stonecutters Island discharges.

The Government therefore has developed a preferred option for HATS Stage 2 to further improve the water quality of Victoria Harbour. It is a two-phase, around HK\$20 billion programme that will provide additional facilities to convey all sewage from the harbour area to Stonecutters Island for chemical treatment and disinfection, and subsequent biological treatment.

THE GOVERNMENT RECOMMENDATIONS IN THE CONSULTATION DOCUMENT

In the consultation document, the Government has the following recommendations for HATS Stage 2:

- extension of deep tunnels to collect sewage from the remaining parts of Hong Kong Island and transfer it to Stonecutters Island Sewage Treatment Works for centralized treatment under HATS Stage 2A;
- expansion of the existing chemical treatment facilities at Stonecutters Island Sewage Treatment Works, plus the addition of disinfection facilities, under HATS Stage 2A;
- reservation of land near the Stonecutters Island Sewage Treatment Works for a biological treatment plant to be built as part of HATS Stage 2B;
- early commencement of preliminary site investigations and environmental impact assessments for HATS Stage 2B; and

- monitoring of harbour water quality and sewage flow trends, as well as population build-up in the harbour area to ensure the timely commissioning of HATS Stage 2B when needed.

CHEVALIER'S VIEWS

In general, Chevalier fully supports the implementation of HATS Stage 2 for the benefit of having a cleaner harbour, which is one of the reasons that Hong Kong has been famous of.

With the implementation of HATS Stage 1, a noticeable improvement of the water quality of the harbour, especially the eastern part, has been observed which is encouraging. As HATS Stage 1 has only dealt with about 75% of the preliminary treated sewage by screening previously discharged directly into the harbour, the remaining 25% should be dealt with without further delay.

The use of deep tunnels in HATS stage 1 for collecting and conveying sewage from various locations, which had caused almost no disruption to the traffic during construction, has proved to be successful and this should continuously be employed in HATS Stage 2.

Also, the centralized CEPT Plant at Stonecutters Island for HATS Stage 1 has been operating without any major problems since its commissioning in year 2001. There have been no public concerns raised regarding the Plant location at Stonecutters Island due to low surrounding population density. With sufficient lands being readily available, HATS Stage 2 by having centralized treatment at Stonecutters Island should be the most appropriate option which would be accepted by the general public.

As the water quality at the western part of Hong Kong from where the effluent of the Stonecutters Island CEPT Plant discharges is still problematic, this has proved that with the chemical treatment alone, the problem still exists. If Stage 2A is to be implemented first, the water quality at the western part of the harbour would definitely be deteriorated as more sewage flows, only chemically treated, will be discharged from Stonecutters Island. It is therefore imperative that biological treatment of the sewage to be implemented in order to fully resolve the problem.

With the introduction of the biological treatment, the provision of disinfection may not be necessary. Taking Sha Tin and Tai Po Sewage Treatment Works as examples where the sewage is biologically treated and the effluent is discharged to Tolo Harbour where the water current is much less than that of Victoria Harbour. Both treatment works have been operating for about 20 years without the provision of the disinfection facilities, but so far no deterioration of the water quality of Tolo Harbour has been reported.

Furthermore, it would be very difficult to have a correct dosing of the disinfection agent. Under-dosing would have no significant improvement to the water quality, and hence a waste of money. Over-dosing, however, would cause other environmental problems by killing the marine species in the harbour.

Should chlorine be used as the disinfection means, there are also hazards in the storage and handling due to the substantial quantity required.

To conclude, to have an integrated sewage treatment system that will collect and treat all the sewage from the harbour area in an efficient and effective manner to cope with future population increases is the key for sustainable development of Hong Kong.

Some Key Questions

1. *Do you agree with the preferred option, i.e. Option A – centralized treatment at Stonecutters Island?*

Chevalier agrees with the option for the centralized treatment at Stonecutters Island. HATS Stage 1, which uses the centralized treatment of about 75% of the preliminary treated sewage at Stonecutters Island, has proved to be a workable option.

2. *Do you agree that Stage 2 should be implemented in two phases, i.e. HATS Stage 2A and Stage 2B?*

Chevalier considers that HATS Stage 2 would be best to be carried out in a single phase in lieu of having Stage 2A and 2B as biological treatment is the ultimate solution to the pollution problems. The earlier the biological treatment facilities are to be put into operation, the earlier we will have a cleaner harbour.

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 Principle"?*

Every Hong Kong citizen should be responsible for protecting the water quality of Victoria Harbour, which is a valuable asset of Hong Kong. The polluter pays concept is indisputable. It is only a matter of how this principle is applied which can be generally acceptable to business owners, general public and investors concerned. The charging for C & D wastes is a major step forward.