To <wqo_review@epd.gov.hk>

cc bcc

06/11/2009 14:27

Subject RE: Initial views on review of WQO

Dear All

I re-read my notes and have edited them for greater clarity below.

. Further to the meeting last Saturday, I think the following is needed:

1. Beneficial Uses is a broad term and we may need to identify 'Polluting or Discharging Uses' separately from 'Beneficial Uses'.

2. We can then identify criteria for amount, type and risk factor for each 'Discharging or Polluting Use' (Example: currently WSD does not allow 'leisure boating' on water reservoirs in fear of pollution. If we have a mechanism of identifying discharge by different classes of uses, we can then develop a system for deciding which uses can be acceptable in which water bodies.)

3. 'Beneficial Uses' is then limited to uses which require that the water which is used meets certain 'Water Quality Standards' for safety, protection or otherwise. We need a system for reviewing the different classes of BUs, and for reviewing WQS assigned to each different class of BUs. (Example: rather than a single blanket 'secondary contact' group, we may want to assign different minimum WQS for wind surfing versus sailing Etchells or larger sail craft - rather than having a single blanket 'secondary contact' group).

4. ;Water Quality Objectives' can be aspirational targets irrespective of current conditions, and based on desired or aspired beneficial uses for a specific wwater control zone. Cost of meeting WQOs includes all works required to collect/divert/treat discharge as well as the cost of disallowing certain 'Discharging Uses'.

5. Separately from 'Water Control Zones' where we control discharge, there is a need to identify 'Beneficial Uses Zones' (not unlike land zoning) identifying the desired or intended beneficial uses of each BUZ bodies. (Example: with the ongoing redevelopment of industrial waterfront sites and the closure of cargo handling areas the Victoria Harbour EAST of the Central/TST Star Ferry is more and more recognized as the 'leisure harbour' where cruise vessels, harbour cruises, yachts and sail boats become the dominant users. Currently this area area is covered by four WCZs. Some of these WCZs also cover the the 'ferry services' zone and the 'commercial shipping zones' West of the Star Ferry - beneficial uses which require no minimum Water Quality Standards.)

6. The alternative to recognizing separate BUZs is to review the boundaries of WCZs based on shifts in beneficial uses, if any, every five or ten years. It appears that the 'leisure harbour' should be recognized as one WCZ, and not the four WCZs as it is now. The need for this dramatic change is a result of the very significant changes in the development around that part of the harbour, and the planned upgrades of the waterfronts, including the addition of more watersports facilities. At a first glance, it appears that the other WCZs are more consistent with their main beneficial uses (as defined above). However, I suggest that a more in-depth review is warranted. Regards

Paul Zimmerman

----Original Message-----From: wqo_review@epd.gov.hk Sent: Tue 11/3/2009 9:49 AM To: Paul Zimmerman Cc: Subject: Re: Initial views on review of WQO

Dear Mr Zimmerman,

We acknowledge and appreciate your interest in the subject. Your comments will be forwarded to our consultant for consolidation.

> WQO Review Environmental Protection Department Water Policy and Science Group

02/11/2009 11:20

To <wqo_review@epd.gov.hk> cc Subject Initial views on review of WQO Dear Sirs

Further to the meeting last Saturday we offer the following

views.

1. That Beneficial Uses is a broad term and that we need to identify 'Polluting or Discharging Uses' and 'Beneficial Uses'.

2. We can then identify criteria for amount, type and risk factor of the 'Discharging or Polluting Uses' (example: currently WSD does to allow 'leisure boating' on water reservoirs in fear of pollution. If we have a mechanism of identifying the discharge by different classes of uses, we can develop a system for deciding on which uses can be acceptable.)

3. Beneficial Uses require a certain Water Quality Standard whether this is for safety or protection or otherwise. We need a system for assigning and reviewing WQS for different classes of uses. (Example: wind surfing may require cleaner water then sailing Etchells or larger sail craft - rather than a single blanket 'secondary contact' group).

4. Water Quality Objectives can be aspirational targets irrespective of current conditions, and based on desired or aspired beneficial uses. Cost includes the efforts of making sure objectives can be met, and the quantity of discharge which need to be contained resulting in discharging uses which must then be disallowed.

5. Beneficial Uses Zones (not unlike land zoning) can identify the desired or intended beneficial uses of the water bodies. (Example: with the ongoing redevelopment of industrial waterfront sites and the closure of cargo handling areas along Victoria Harbour EAST of the Central/TST Star Ferry, this part of the Harbour is more and more recognized as the 'leisure harbour' where cruise vessels, harbour cruises, yachts and sail boats become the dominant users. The area is covered by four WCZs. The 'ferry services' zone and the 'commercial shipping zones' are East of the Star Ferry.)

6. The alternative is to adjust WCZs based on this major shift in uses. From looking at the WCZ overview - it is specifically the 'leisure harbour' where the BUZ and WCZ differ a lot - which is to be expected given the change in development.

Regards

Paul Zimmerman