



15th December, 2009

Environmental Protection Department
Water Policy and Science Group
33/F, Revenue Tower
5 Gloucester Road
Wan Chai,
Hong Kong

Dear Sir / Madam

Official response from the Jardine Engineering Corporation to the Environmental Protection Department's Public Consultation on the 'First Stage Public Engagement Document for the Review and Development of Marine Water Quality Objectives'

a) What are your views on the key issues set out in section 4 above?

The key issues set out a good overview of the current situation in Hong Kong and the comparison with overseas best practice. Updating the scope of WQOs on the basis of these key issues could provide more detailed guidance to stakeholders and act as a focus for improving water quality in the territory.

Section 4 currently presents a useful focus on the water quality needs of different beneficial uses and current international best practice. The Environmental Protection Department (EPD) could also consider the effects of changes in technology, urban development, and public expectations as key issue focuses.

b) What are your views on the beneficial uses (BUs) and sensitive receivers set out in section 2? Are you aware of any other beneficial uses of waters that should be considered in this review?

Section 2 provides a good summary of BUs; however, it would be good to pinpoint and publish precisely where BUs can come into conflict with natural habitats and where BUs can come into conflict with each other. For example, there may be a conflict between effluent discharge and natural habitats or fish culture. Technology could have a significant part to play in solving potential conflicts.

Another beneficial use that could be considered is tourist related activities. For example, tourists may be particularly sensitive to the perceived cleanliness of the Victoria harbour. EPD could consider measures to improve the visual quality of water in areas that attract a large number of tourists.

c) What are your views on the priority level of protection for various beneficial uses, sensitive receivers and sensitive organisms that should be protected through the WQOs?

JEC believes that the protection of human health must be the first priority in the creation of WQOs. The protection of the natural environment is also critical and often goes hand in hand with the protection of human health. At the same time, beneficial uses such as amenities, mariculture, fisheries, cooling, toilet flushing, navigation, and effluent discharge must be served.

A combination of solid WQOs, good planning, and proper implementation will ensure that human health, BUs, and the environment are all well served.

d) In respect of Appendix A, what other types of WQOs or parameters should be considered in the next stage?

The list of parameters covers the most important chemical elements and, as mentioned elsewhere in the document, numerical acceptance levels should be considered in the next stage.

Ecological parameters, such as the number of fish in a particular area, could also be considered for the basis of WQO in the next stage. Biological WQOs are discussed in section 4 but could also be included in the list of parameters for closer attention.

e) What are your views on the review approaches as set out in section 5 above?

JEC agrees with the approaches set out above. Re-zoning is an important project and should be done with consideration for the different needs of different end-users in different areas.

f) What broad water quality management principles should be considered in the next stage?

- Continuous improvement with the help of the latest technology.
- Consideration of how to co-operate with Mainland China.
- Consideration of how to mitigate the impact of the Pear River Delta.
- Expanding villages around Sai Kung currently have no water treatment. EPD could consider a project to collect and treat wastewater from these villages.

For any further enquiries regarding the Jardine Engineering Corporation's response to the Environmental Protection Department's Review of Marine Water Quality Objectives please contact the undersigned.

Yours faithfully



Finn Carew
Business Development