

16 January 2010

WQO Review
Environmental Protection Department
Water and Science Group
33/F Revenue Tower
Wanchai
Hong Kong

Dear Sirs

First Stage Consultation on Review of Marine Water Quality Objectives

We apologize for missing the deadline for response and trust that our views which follow may be none-the-less considered.

The consultation document is well drafted and we feel the issues have been clearly and fairly set out. We note that this stage is intended to establish the broad basis of approach, leaving the 'technical issues, benefits and socio-economic impacts' to be later considered.

We believe that this stage should be focussed in terms of *outcomes*, i.e the starting point should be the water quality that Hong Kong must achieve in order to play a responsible role in the conservation of resources and biodiversity. With that as the basis, the experience and practice of overseas jurisdictions will provide methodologies and indicators, i.e the *processes*.

In general we agree with the *outcomes* suggested in the document:-

- in respect of beach WQ - to achieve a nil-to-low-risk-to-health outcome
- in respect of nutrient loading - to achieve a low-risk-of-algae-bloom outcome

However in respect of protection of species outcome we do not agree that an 80% outcome is acceptable. We would observe"-

- this is at the lowest end of the international comparisons provided, and
- is not species specific

For example it would not be acceptable if the protection achieved failed to preserve the entire food chain and welfare of the Chinese white dolphins. The same is doubtless true of other species. It is essential we feel to evaluate all marine life, and establish (from trials and overseas observations) what tolerance levels preserve life. From this information to conclude what species will be at risk or certainly lost at certain toxicity levels, and then decide whether or not the extinction of these species in HK waters can be accepted.

We note that the WQO requirements of different water bodies will vary depending on use, and presume thereby that the existing practice of differential

WQOs will continue. We have no objection to this approach. However we would not wish to see prudently expected WQOs (at levels needed to maintain existing habitats and BUs) compromised by socio-political considerations. This study should be an exercise to determine what WQOs are essential to meet conservation and BU objectives, rather than one designed to reflect the competing and currently limiting considerations of the development or financial lobbies.

Thank you for your consideration.

Yours faithfully



Clive Norfolk
Green Lantau Association