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15<sup>th</sup> November 2004

Environment, Transport and Works Bureau  
10/F Citibank Tower  
3 Garden Road  
Central, Hong Kong.

Dear Sirs,

**Harbour Area Treatment Scheme consultation – Submission of Views**

We write to submit, for your kind consideration and examination our views of Hong Kong's overall sewage strategy

**The necessity for Stage 2 of Harbour Area Treatment Scheme (HATS 2)**

The consultation document stated and pre-decided that HAT2 is essential because the water quality in the Victoria Harbour is of unacceptable quality, which made the beaches along the Tsuen Wan coast unsuitable for swimming.

We DISAGREE with the accusation that the water quality in Victoria Harbour has now reached a state that necessitated HATS2. To the contrary, the consultation document itself stated that HATS1 already substantially improved and increased the compliance rates of the Harbour's water quality objectives from 65% to over 90%. While we acknowledged that the water quality of a few beaches along the Tsuen Wan coast remained poor, but the amenity value and usage of these beaches were always low. Furthermore, these beaches had become increasingly unsuitable and unsafe for swimming in recent years because of the increased marine traffic and tidal current associated with harbour development and reclamation. We concluded that it would be a terrible waste of taxpayer's money to spend another 20 billion to chase after a few more % of WQO compliance rates and to protect a handful of doomed beaches.

We also felt that the consultation document is a very short sighted piece of document because it only focused in the Victoria Harbour. The document stated that large volumes of sewage were also generated outside the HATS, but a very substantial percentage of which were currently totally untreated and causing widespread pollution and health problems most notably in the Northern and Western New Territories. Indeed, the consultation document stated that only 76% of our rivers are in good condition. This is a well disguised yet undignified way of saying that a quarter of our rivers are unhealthy. We therefore urged that the 20 billion capital money the government intends to further treat the already well-treated sewage in the harbour area should be diverted to laying essential sewage collection pipes and building basic sewage treatment facilities for the increasingly populated and yet unsewered areas in Yuen Long and Tuen Mun area. From a fairness point of view, it is also unfair for those sewage charge payers living outside the HATS catchment area to foot the bill for a prettier harbour while the environmental nuisance caused by their unsewered neighbors continue to haunt them.

During an earlier consultation exercise conducted by the SSDS Review Secretariat in 2000, we already offered our views in June 2000 that the choice of treatment level for sewage must base on actual need rather than irrational or political decision. We also suggested another long term strategy that the treated sewage from the secondary sewage treatment plants outside the HATS catchment should be regarded as a source of Hong Kong's raw water supply. This is particularly important as we learnt from the newspaper recently that the Dongjiang River currently experienced a 1 in 70 years drought and the days of water rationing could return. A copy of our earlier submission is attached again for your consideration. We have not changed our stance.

### **Siting of sewage treatment facilities for HATS 2**

In addition to our objection to proceeding with HATS 2, we were also DISAPPOINTED to see that the options considered for HATS 2 lacked innovation and ingenuity because they all needed large pieces of new and valuable land in the Stonecutters Island, or Lamma Island or even in caverns beneath prestigious private residential areas in the midst of HK Island. We already suggested in June 2000 that future sewage treatment facilities should be built beneath elevated highways to maximize the utilization of what were already dead and low value spaces. Obviously, the Government did not have the courtesy to even study such possibilities.

**Conclusion**

In conclusion, we summarise below our views :

- (1) HATS2 is a waste and unfair use of money. It is much more urgent and sensible to use the sewage treatment money on those hundreds of thousands currently deprived of the decency of the most basic sewage infrastructure.
- (2) Avoid using pristine land for building sewage treatment plant. Look for those dead spaces under the bridges.
- (3) Develop a long term strategy to re-use treated sewage as a source of raw water supply.

Thank you for our attention, and I hope you will treat our submission this time with greater seriousness and more sincere respect.

Yours sincerely,

*For and on behalf of*  
**SUNFLAKE COMPANY LIMITED**

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*Director*