



20.11.2004 11:44 AM



cc.
Subject: Comments on HATS Stage 2

Dear Sir

Attached please find The Conservancy Association's comments on HATS Stage 2

For and on behalf of The Conservancy Association

Li Siu Man Peter
Publications and Campaign Officer
The Conservancy Association





長春社 since 1968

The Conservancy Association

The Conservancy Association's Response to HATS Stage 2 Consultation

The Conservancy Association has taken an interest in the Harbour Area Treatment Scheme (previously called Strategic Sewage Disposal Scheme) ever since its inception over a decade ago. In response to the Government's publication of the Consultation Document for HATS Stage 2, we would like to submit our views below:

1. Level of Treatment

We welcome the confirmation by the Government that biological treatment is needed as a sustainable solution to our sewage problem in the metro area. This level of treatment is not only essential to improving water quality in the harbour area and beyond, but also serves a much-needed demonstration effect to our neighbouring cities in the Pearl River Delta. Without a concerted regional effort our water quality will always be at risk. However we are disappointed that the government has not yet committed to full-blown secondary (biological) treatment with a clear timeline and resource allocation. Secondary treatment is a legal minimum in most developed countries and in mainland China. Without this the water quality in the harbour cannot possibly get up to the standard which most of the proposed harbour plans now require - a harbour that can accommodate recreational uses.

2. Centralised or decentralised?

Whilst we still believe that decentralised options as contemplated by the International Review Panel (IRP) in 2000 have merits beyond what the centralised option can offer, on balance we agree that a centralised plant at Stonecutters Island is an acceptable solution provided that it can be implemented immediately in accordance with the precautionary measures and safeguard mechanisms outlined below. However, we must point out that our support for a centralised option is conditional upon (1) full commitment by the Government for secondary treatment with clear timelines and resource allocation; (2) precautionary measures adopted to prevent a repeat of the contractual and construction problems encountered in the deep tunnel construction in SSDS; (3) institutional changes to be implemented immediately to improve efficiency, enhance accountability and promote transparency and public participation in the entire project life-cycle.

3. Design Flow

Selecting an appropriate design flow for the treatment plants is very important to achieving a cost-effective scheme. When estimating the size of facilities required, the Consultation Document assumes a 40% increase of harbour-catchment population from 4.56 million in 2003 to 6.28 million in 20xx, and a corresponding 56% increase in flow volume from 1.8 million cubic meters per day to 2.8 million. Considering that there will be no more reclamation and that the public has demonstrated its aspiration for a gradual lowering of development density in the urban area, this assumption is unjustified. These highly inflated figures translate into highly inflated cost estimates for Stage 2. Furthermore, these estimates do not allow for water conservation, including the use of financial instruments (water and sewage charges) to reduce water consumption, which should be the default measure to mitigate the risk of excessive sewage volume in the distant future. Moreover, the IRP recommends using a lower design peak factor (the ratio of peak design flow to average daily flow) of 1.4 instead of 2. We understand that this ratio can be confirmed from the actual operating conditions of the Stonecutters Island Plant over the last three years. When a lower population projection and a lower peak design factor are adopted, the cost estimate for the entire Stage 2 will be much reduced.

4. Phasing

We do not believe that the current phasing of Stage 2A and Stage 2B is appropriate. We believe that the government should commit immediately to full-blown secondary treatment with a technical phasing in line with sewage volume increase. Under our proposed scenario Phase 2A should include the construction of the deep tunnels and secondary biological treatment modules that can satisfy the current sewage flow of 1.8 million cubic meters per day. Phase 2B should be the construction of further secondary treatment modules up to the revised estimate (lower than 2.8 million cubic meters day) of final capacity. Using this new phasing the intermediate step of chlorine disinfection can be omitted unless it is deemed necessary after the completion of Phase 2A. Alternative biological treatment technologies with or without chemical-enhanced primary treatment should be evaluated before the commencement of the design for treatment modules in Phase 2A. A firm commitment now to full biological treatment will remove any interim considerations and allow the most cost-effective technologies be chosen as soon as possible. However, the construction of the deep tunnels can begin immediately whilst the evaluation for the best available technologies takes place.

5. Institutional Changes

As expressed in the Joint Statement by eight green groups in 2001 (see attached), a major cause to the problems arising in SSDS is the confused lines of responsibilities and the lack of accountability in government departments. Unfortunately the

question of institutional defects has not been tackled in the Consultation Document. The Government must address this issue before embarking on HATS Stage 2 which involves very significant public funds. There should be broad-based participation by the community in project design and monitoring. We believe that the concept of a Water Authority which shoulders the integrated responsibilities of water supply and sewage treatment should be adopted as a clear policy objective. This will allow the concept of total water resource management be reflected in the institutional set-up.

6. Private sector participation

We are open to the idea of private sector participation provided public interest can be safeguarded in the process. A new institutional mechanism should be set up to evaluate what are the public interest at stake in this process, to ensure that appropriate contractual terms are built in, and to monitor the progress of such scheme. This mechanism should be designed in accordance with the principles of transparency, accountability and public participation.

7. Public participation in decision-making

Since this is a strategic project involving significant public funds and important public interest, the public should be provided with full access to participate in the decision-making. The HATS Monitoring Group, which had been set up to monitor the progress of the scheme since 2001, was actually dissolved prior to the issue of this Consultation Document. Hence it is doubtful as to whether this Consultation Document receives the support of the experts in the Monitoring Group. This makes a mockery of the public participation process over the last three years. It is clear that a more transparent, accountable and broad-based public participation process must be installed to avoid the past mistakes and to oversee the future of HATS Stage 2.

The Conservancy Association
20 November 2004

Attachment: Joint Statement by Green Groups in 2001

EMBRACE A NEW SEWAGE TREATMENT SCHEME FOR HONG KONG**JOINT STATEMENT OF ENVIRONMENTAL GROUPS ON STRATEGIC
SEWAGE DISPOSAL SCHEME ('SSDS')**

An International Review Panel (IRP) of experts was appointed by the Hong Kong Government in April 2000 to review the controversial SSDS programme which has aroused significant public concern over the past years. Environmental groups have responded positively to the government's call to participate in the review process in response to the government's stated wish to use the adjudication of the IRP to build a consensus for the way forward. It should be commended that the review process has been carried out in an open and independent manner, with the first ever public hearing conducted in May 2000 to solicit views from the public and other interested parties for a major environmental issue.

The IRP published its report of the review in November 2000. The results of its findings are now well known to the public. In essence it has ruled that all stages of SSDS, except for the Stage I already built, should be abandoned and redesigned because they are neither environmentally sustainable nor cost-effective.

In summary, the IRP has reached the following conclusions:

- discharge of partly treated sewage by a long ocean outfall in the waters south of Lamma Island can neither satisfy water quality standards nor be cost-effective;
- a higher level of sewage treatment is both necessary and cost-effective; the IRP has recommended the process of Biological Aerated Filters (BAF) which is more efficient and requires less land space;
- despite the sunk costs in SSDS Stage I, it would still be feasible to treat part or all of the sewage from Hong Kong Island in either one or two new sewage treatment plants other than the existing one in Stonecutters Island; a distributed sewage treatment scheme can be designed to be as cost-effective as a single centralised plant in Stonecutters Island.

The undersigned environmental groups believe that the IRP has, within the constraints of its limited mandate and resources, reached a fair and independent conclusion. We support the IRP's recommendations for the way forward. We urge the government to publicly accept the IRP's report, implement its recommendations and embrace the concept of a new distributed sewage treatment scheme as a matter of urgency. The findings of the IRP represent the best chance for Hong Kong to bury the past controversies of SSDS and to build a consensus in tackling its sewage pollution in a sustainable manner. The IRP has also found that Hong Kong taxpayers could save up to \$10 billion at present price level by adopting the new options.

However, the undersigned environmental groups are conscious of the fact that whilst the IRP has pointed out the direction of a sustainable solution, this solution – a major and costly public project in its own right – will not be satisfactorily delivered if the present institutional mechanism that has nurtured the controversial SSDS remains unchanged. We believe that the government should learn the lessons of the failed SSDS which has cost the public dearly:

- Why were key options and innovative process technologies not investigated in previous EIA studies?
- How to ensure the quality of EIA reports and that these reports are properly scrutinised in the EIA process?
- How should the role and composition of study management groups and the relevant steering mechanisms be reviewed to ensure higher quality, more transparency and increased public participation?
- How will the Government ensure the quality and professionalism of both the in-house professional and external consultants?
- How can the quality of policy decision making be ensured in view of the number of Government departments involved with confused lines of responsibility?
- How will future policy making processes fully address public opinions and development of new technologies?
- How would the Government set up new mechanisms to empower concerned community groups, including the provision to these groups of public resources so that they can come up with viable alternatives in major and technically complex projects?

All the above are important questions, the pursuit of which should not only help improve institutional mechanisms for the new options, but for other major infrastructure projects as well. A mechanism should be set up to ensure proper project management of the remaining sewage treatment scheme. We also urge the Government to incorporate the concept of Total Water Management in setting the strategy for our water resources and sewage treatment.

We urge the government to immediately announce its acceptance of the IRP recommendations, select one of the IRP-recommended options, consult the public and adopt the new sewage treatment scheme as a matter of top priority. To ensure continuity, the terms of the IRP members should be extended so that the experts can oversee the development process of the new options. Hong Kong deserves a cleaner harbour and cleaner waters for us and our future generations.

Endorsed by the following environmental groups:

The Conservancy Association

Friends of the Earth

Green Power

World Wide Fund for Nature Hong Kong

Greenpeace

Produce Green Foundation

Green Lantau Association

Green China Foundation

10 January 2001

為香港尋求一個新的策略性污水處理計劃 環保團體對策略性污水排放計劃的聯合聲明

香港政府在二零零零年四月委任國際專家小組檢討在近來引起很大關注，具爭議性的策略性污水排放計劃。環保團體一直響應政府的呼籲，積極參與檢討過程，實現政府希望透過專家小組的議決作為社會共悉的基礎的目標。值得一讚的是，由二零零零年五月第一次公眾諮詢會開始，整個檢討過程在一個公開及獨立的情況下進行，聽取各方有關團體對這項重大環保工程的意見。

專家小組在二零零零年十一月完成報告，有關檢討結果已經公開給公眾查閱，總結來說，專家小組認為，除了第一期已建成的工程外，整個策略性污水排放計劃應該放棄及重新設計，因為該計劃並不符合可持續發展及成本效益原則。

總括來說，專家小組得出以下結論：

- 經深水隧道將部分處理的污水排入南丫島以南水域的方案是不利水質標準，亦不合乎成本效益；
- 一個較高污水處理水平的方案是必要而且更具經濟效益，專家小組建議採用更有效率及佔地較小的曝氣生物濾池技術；
- 雖然有關計劃不乎合成本效益及第一期工程已經完成，但將部分或全部污水由現時輸往昂船洲污水處理廠改為輸往一至兩個新污水處理廠的方案仍然可行；此外，可以設計一個至少與昂船洲單一及集中式的污水處理廠一樣成本效益的分散式污水處理計劃

下方簽署的環保團體相信專家小組在有限的權責及資源範圍內，已經達到一個公正及獨立的結論，我們支持專家小組對未來路向的建議，並敦促政府公開接納專家小組的報告、遵行有關的建議，及儘快為香港尋求一個新的「分散式污水處理計劃」。其實，專家小組的結論正好給香港一個最好的機會，摒棄過去因策略性污水排放計劃引起的種種爭議及就長遠解決污水污染問題尋求共悉。專家小組又發現，假如採用專家小組的建議，香港的納稅人可以節省高達一百億元。

不過，下方簽署的環保團體認為，今次專家小組只是針對策略性污水排放計劃的長遠解決方案作出意見，要真正為香港尋求一個可持續的發展方向，必須改革背後引起今次極具爭議性的策略性污水排放計劃的現行機制，我們深信政府應該汲取今次令市民付出極大代價的教訓：

- 為什麼過去的環境影響評估報告未有包括主要的方案及最新的技術？
- 如何保證環境影響評估報告的質素及審核這些報告的程序？
- 如何檢討現時監督架構的職責及組成，容許更高的質素及透明度，及增加公眾參與？
- 政府如何保證在架構內或外的顧問有一定的專業知識？
- 如何保障政策的決定已經權衡過各政府部門不同的要求？
- 如何在將來的政策決定過程中給予公眾意見及嶄新技術足夠的空間？

- 政府如何成立一個新的機制，在重大及涉複雜技術的工程上，給予有關的社會團體一定的資源，容許更多可行的方案？

我們提出以上的重要問題，目的不單是爲了尋求新的污水處理方案，同時爲改善在設計所有基建項目時的機制。我們希望成立一個合適的管理架構統籌未完成的策略性污水處理計劃，及引入「全面水利管理」概念。

我們主張政府馬上接受專家小組的建議，選擇其中一項建議進行公眾諮詢，並且將成立新的策略性污水處理計劃定位爲首要任務。爲繼續是項研究，應該延長專家小組成員的任期，讓專家小組能夠監督新策略性污水處理計劃。香港可以有更清潔的海港，我們及下一代亦應享受更潔淨的水源。

長春社

地球之友

綠色力量

綠色大嶼山協會

綠色和平

綠田園基金

世界自然(香港)基金會

綠化中國基金

二零零一年一月十日