



CIWEM HK

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THE CHARTERED INSTITUTION OF
WATER AND ENVIRONMENTAL MANAGEMENT
HONG KONG

香港水務及環境
管理學會

Our Ref.: L0022112006

Date: 22 November 2006

Environmental Protection Department
28/F., Southorn Centre
130 Hennessy Road
Wah Chai
Hong Kong

(Attn: Mr Elvis WK Au)

Dear Mr Au,

Re: A Draft Comprehensive Plan to Tackle Road Traffic Noise in Hong Kong

Thank you for your invitation letter to the captioned forum dated 31 July 2006. We would like to offer our comments as follows:

1. Streamlined approach to the implementation of Environmental Impact Assessment Ordinance (EIAO) Procedures

As some of the project areas, classified as “Designated Project” will undergo the EIAO process, for typical infrastructure project, it will take at least 8 – 9 months (or more) for the whole process including compliance with the statutory procedures, liaison with the assumption/methodology with government and relevant parties, receipt of comments from public and Advisory Council on the Environment (ACE) and etc. In Hong Kong, schedule of the whole project starting from feasibility stage to construction via preliminary design, investigation, detailed design and tender, is extremely tight. From the economic perspective, it may not be very cost efficient and time saving. It is vital to balance the pros and cons of all the factors to improve the entire process. Hence, rearrangement and simplifying the steps is suggested to further investigate and re-visit in order to streamline the whole EIAO process. It is suggested to review the environmental process from other countries. For example such as Shanghai (China), in which a relatively fast-track program for the EIA process is adopted for the current development projects.

2. Consistent requirement for the EIAO Policy and Retrofitting Noise Barrier Policy

As the Retrofitting Noise Barrier programme has been commenced for a few years, the relevant guiding principles and criteria have been established and adopted.

Nevertheless, some of the project areas, which are undergoing EIAO process, may coincide with the program for part of the sections within the project boundary, which is implementing the Retrofitting Noise Barrier policy. Due to the distinct nature of both policies, a clear indication for the requirement including but not limiting to the extent of road section concerned, selection of noise criteria, design year of traffic flow for noise assessment, priority for the assessment and etc, is indeed crucial for the investigation of the noise performance data of the provided noise amelioration works and for the further study by other parties in the future.

3. Long Term Policy for Controlling Imported Vehicles

Understanding that EPD has already implemented the policy to control the noise emission from the imported vehicles. Nevertheless, in order to improve the performance of the "control at source", a further review of this policy (in long term) for controlling the total number of imported new vehicles is suggested. Apart from the direct benefit of protection from noise perspective, this may also bring the community with secondary environmental benefits such as reduced vehicular emissions hence improved air quality, enhanced energy efficiency by more utilisation of public transport and mass transit, etc.

4. Public Involvement in Selection of Sensitive Receivers for Environmental Impact Assessment

As the noise nuisance to sensitive receivers is very subjective, comments and complaints were usually received upon the completion of EIA or/and construction. Although it is understood that public consultation is formed part of the EIA statutory process, it is suggested that public involvement in the selection of sensitive receivers during EIA process is needed to ensure the effectiveness of the provided noise mitigation measures being accepted by the nearby residents and users.

Should you have any queries on the above comments, please do not hesitate to contact the undersigned at 2788 5647, email: kenny@hkpc.org or Ms Philomena Lau at 2788 5367, email: philomena@hkpc.org.

Yours sincerely,



Kenny Wong
Chairman, CIWEM HK