



"Sandra Chow"
<@wwf.org.hk>
30/03/2012 18:21

To <ccc@fhd.gov.hk>
cc "Alan Leung" <@wwf.org.hk>
bcc
Subject Re: Licensing Scheme for Private Columbarium
 Urgent Return receipt Sign Encrypt

Dear Sir/Madam,

Please find attached our submission regarding the captioned.

Thank you for your attention.

Yours faithfully,

Sandra

Sandra Chow

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WWF Hong Kong works to ensure a better environment for present and future generations in



Hong Kong Licensing scheme on private columbarium_Mar 12_WWF.pdf



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Our Ref.: CHK/LAW T6/12
30 March 2012

Food Branch, Food and Health Bureau
17/F, East Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong
(E-mail: ccc@fhb.gov.hk)

By E-mail ONLY

Dear Sir/Madam,

Re: Licensing Scheme for Private Columbarium

WWF welcomes the idea of a licensing scheme because it can help protecting the ecologically sensitive areas that are privately owned from the adverse impacts of unauthorized columbarium development and its associated destruction activities. Nevertheless, in addition to the existing statutory requirements, we opine that the ecological and environmental aspects should be highlighted and considered before a license being issued. Our comments are stated as follows:

Section 1.6

In addition to Section 1.6 (a) to (d), we consider that potential impacts on the natural environment should be one the main considerations. Sites suitable for columbarium development are usually at remote locations and surrounded by natural habitats which are ecologically sensitive. In recent years, some of the sites have been facing imminent threats from columbarium development. One of the incidents is the recent suspected columbarium development in Po Toi, large-scale vegetation and large amount of concrete slabs were found on areas which were previously some natural habitats (e.g. shrubland and woodland) while it also affected the habitats of Romer's tree frogs (*Liuixalus romeri*) which is an endemic species to Hong Kong. On the other hand, potential impacts from water pollution in both the construction and operation phases will be anticipated if a private columbarium is located near the natural streams or even the ecologically sensitive Ecologically Important Stream (EIS)¹ and Water Gathering Ground (WGG). For instance, polluted surface

¹ The need to protect ecologically important stream is also recognised by the Environment, Transport and Works Bureau in its Technical Circular No. 5/2005.

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runoffs from columbarium development facilities will be discharged to natural streams via storm water drains, rendering pollution and adverse impacts to the stream ecology. Given the ecologically sensitive areas are susceptible to environmental destructions and human activities, we consider that due consideration should be given on the protection the natural environment.

Section 4.5 (b) Statutory requirements Cap. 131

It is suggested that *"For applications for licences from private columbaria located in areas without any statutory plans, FEHD shall seek the comments of PlanD in assessing the land use compatibility of a certain site before submitting the case to the Licensing Board for consideration"*. Pursuant to the above-mentioned environmental destructions and columbarium developments in Po Toi and Shui Mong Tin² before the gazettal of DPA plans, it is of prime concern that areas without any statutory plan may have fallen as constant targets of columbarium developments. Therefore, besides the land use compatibility, we opine that the potential ecological and environmental impacts on the application site and its surrounding areas due to the proposed columbarium use should also be taken into account at early stage, especially for those ecologically sensitive areas. Relevant government including Agriculture, Fisheries and Conservation Department (AFCD) and Environmental Protection Department (EPD) should be consulted on the ecological and environmental aspects.

Section 4.5 (c) Lease conditions and land occupation

With reference to the columbarium development at Shui Mong Tin, large-scale destructions including site formation were conducted prior to the application for a lease modification from agricultural use to columbarium use. As such, we consider that "destroy first, develop later" approach should be taken into account when the authority considers the applications for lease modification for columbarium use and sympathetic consideration should not be given.

In addition, due to the rising demand for private columbarium facilities, we are worried that deliberate actions to destroy the natural environment in hope to facilitate columbarium development in the future would increase. We consider that exemption³ should not be given to those private columbaria which adopt the "destroy first, develop later" approach.

² Association for Geoconservation, Hong Kong
http://www.rocks.org.hk/Intelligence/shui_mong_tin/Summary_AGHK_MSC_followup_actions_Ch.pdf

³ Reference is made to Section 5.10 & 5.12 of the captioned consultation document

Based on the rationale as stated above, WWF strongly recommends the licensing authority to impose stringent conditions in licence issuing so as to protect our natural environment from adverse impacts arising from private columbarium development.

Thank you for your attention.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'SC' or similar initials, written in a cursive style.

Sandra Chow

Conservation Officer, Local Biodiversity