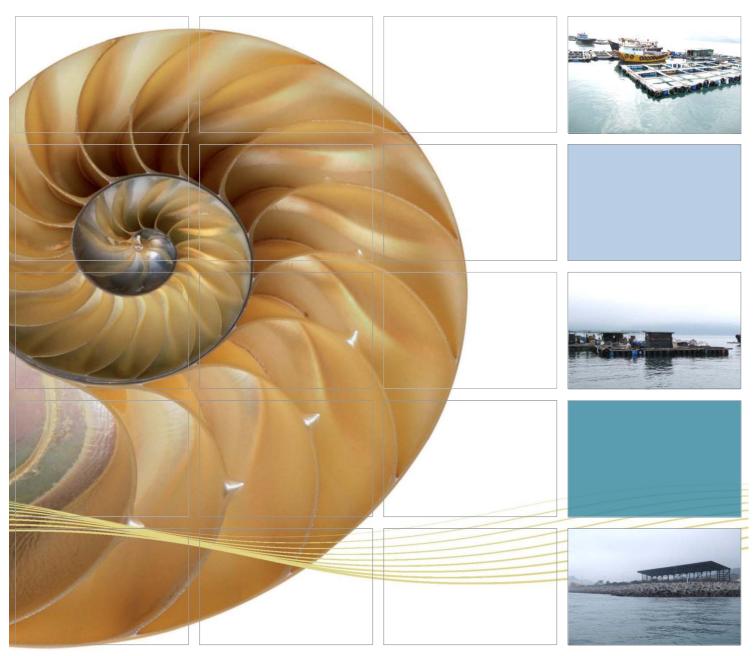
EM&A REPORT





Asia Submarine-cable Express (ASE) – Tseung Kwan O

Third Weekly Site Inspection Report

24 October 2012

Environmental Resources Management

16/F DCH Commercial Centre 25 Westlands Road Quarry Bay, Hong Kong Telephone 2271 3000 Facsimile 2723 5660

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Asia Submarine-cable Express (ASE) – Tseung Kwan O

3rd Weekly Site Inspection Report

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Client:		GMS No:						
NTT Co	m Asia Ltd	0171870						
Summary:	ort presents the inspection findings and the implementation	Date: 24 October 2012 Approved by:						
status of	the EM&A recommendations on environmental protection tion control mitigation measures and monitoring.	levor						
		Terence Fong Project Director						
0	3 rd Weekly Site Inspection Report	GYANG	GYANG	TFONG	24 Oct 12			
Revision	Description	Ву	Checked	Approved	Date			
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Asia Submarine-cable Express (ASE) – Tseung Kwan O Environmental Certification Sheet EP-433/2011

Reference Document/Plan

Document/Plan to be Certified/ Verified:	Third Site Inspection Report
Date of Report:	24 October 2012
Date prepared by ET:	ERM-Hong Kong Ltd
Date received by IEC:	Ecosystem Ltd

Reference EM&A Manual/ EP Requirement

EM&A Manual Requirement:						
Section 3						
Content: Marine Mammal Observation						
"A marine mammal exclusion zone within a radius of 250 m from the cable installation bage will be implemented during the cable installation works taking place in daylight hours along the section outside Zones A to B (ie Zone C and from C to the boundary of HKSAR waters)"						
Section 5.1						
Content: Site Inspections						
"A weekly site inspection will be carried out at the proposed BMH in TKO Industrial Estate until the completion of construction works at the landing point. The areas of inspection will not be limited to the site area and should also include the environmental conditions outside the site which are likely to be affected, directly or indirectly, by the site activities"						
EP Condition:						
Condition No. 2.4						
Content: Site Audit						
"To monitor the environmental impacts and timely implementation of the recommended mitigation measures, the Permit Holder shall:						
(i) implement the EM&A programme of the Project in accordance with the procedures and requirements set out in the approved EM&A"						
(ii) submit to the Direct (a); (b) weekly impact monitoring and site audit report within three days after the relevant monitoring data are collected or become available; and (c)"						



ET Certification

I hereby certify that the above referenced document/plan complies with	the above refe	renced condition of
EP-433/2011.		
leve		
Terence Fong, Environmental	Date:	24 October 2012
Team Leader:		

IEC Verification

I hereby verify that the above referenced document/plan complies with the above referenced condition of EP-433/2011.

Dr Vincent Lai, Independent Environmental Checker:

Date:

à.

4

24 October 2012

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EXECUTIVE SUMMARY

NTT Com Asia (NTTCA) proposes to install a telecommunication cable (Asia Submarine-cable Express (ASE) cable) of approximately 7,200 km in length, connecting Japan and Singapore with branches to the Philippines, Hong Kong SAR (HKSAR) and Malaysia. A Project Profile (PP-452/2011) which includes an assessment of the potential environmental impacts associated with the installation of the submarine telecommunications cable system was prepared and submitted to the Environmental Protection Department (EPD) under section 5.(1)(b) and 5.(11) of the Environmental Impact Assessment Ordinance (EIAO) for the application for Permission to apply directly for Environmental Permit (EP). The Environmental Protection Department, subsequently issued an Environmental Permit (EP- 433/2011).

This is the **Third Weekly Site Inspection Report** that presents the findings of the site inspection and other EM&A activities undertaken during the period from **15** to **21 October 2012**.

Environmental Site Inspection

A weekly joint environmental site inspection was carried out by the representatives of the Contractor and the Environmental Team (ET). Environmental performance complied with the environmental requirements and all necessary mitigation measures were properly implemented.

Marine Mammal Observation

Daily marine mammal exclusion zone monitoring started on 15 October 2012 when the cable installation barge entered Zone C. Every day prior to the start of cable installation, the qualified observer scanned the 250 m exclusion zone for at least 30 minutes to ensure no cetaceans in the exclusion zone. During the reporting period, no cetaceans were reported to have been observed within 250 m exclusion zone.

Environmental Complaints, Non-compliance & Summons

No non-compliance with PP recommendations, EP conditions and other requirements associated with the construction of the Project was recorded in the reporting period.

No environmental complaint was received in this reporting period.

No environmental summons was received in this reporting period.

Upcoming Works for the Next Reporting Period

Works to be undertaken in the coming monitoring period include cable laying works east of Zone C until the boundary of HKSAR waters, seawall duct work, land duct laying works, beach manhole construction and backfilling and restatement. Potential environmental impacts arising from the above construction activities are mainly associated with marine water quality, dust, construction noise and waste management.

1 INTRODUCTION

ERM-Hong Kong, Limited (ERM) was appointed by NTT Com Asia (NTTCA) as the Environmental Team to conduct regular site inspections and audit the implementation of all environmental monitoring and mitigation measures recommended in the Project Profile (PP) (Register No. PP – 452/2011) for the Proposed Asia Submarine-cable Express (ASE) – Tseung Kwan O (the Project).

1.1 PURPOSE OF THE REPORT

This is the **Third Weekly Site Inspection Report** (the Report), which summarises the inspection findings for the period from **15 October 2012** to **21 October 2012** and the implementation status of the EM&A recommendations on environmental protection and pollution control mitigation measures and monitoring.

1.2 STRUCTURE OF THE REPORT

The structure of the Report is as follows:

Section 1: Introduction

Details the scope and structure of the Report.

Section 2: Project Information

Summarises background and scope of the Project, site description, construction programme, the construction works undertaken and the status of Environmental Permits/Licenses during the reporting period.

Section 3 : **Environmental Monitoring** Summarises the monitoring programmes as recommended in the PP and the monitoring undertaken during the reporting period.

Section 4 : **Site Inspection Results** Summarises the findings of the weekly site inspection undertaken within the reporting period.

Section 5 : **Environmental Non-conformance** Summarises any exceedances of environmental performance standard, environmental complaints and environmental summons received within the reporting period.

Section 6 : **Upcoming Works for the next Reporting Period** Summarises the impact forecast and monitoring schedule for the next reporting week.

Section 7: Conclusions

2.1 BACKGROUND

NTT Com Asia (NTTCA) proposes to install a telecommunication cable (Asia Submarine-cable Express (ASE) cable) of approximately 7,200 km in length, connecting Japan and Singapore with branches to the Philippines, Hong Kong SAR (HKSAR) and Malaysia. NTTCA is responsible for securing the approval to land the ASE cable in Tseung Kwan O, Hong Kong SAR (HKSAR). The proposed landing site will be at a new Beach Manhole (BMH) and ultimately connect with a Data Centre in Tseung Kwan O (TKO) Industrial Estate which is scheduled for completion in 2012. From Tseung Kwan O, the cable will extend eastward approaching the Tathong Channel. Near to Cape Collinson, the cable is approximately parallel to the Tathong Channel until north of Waglan Island where the cable travels eastward to the boundary of HKSAR waters where it enters the South China Sea. The total length of cable in Hong Kong SAR waters is approximately 33.5 km. A map of the proposed cable route is presented in *Annex A*.

A Project Profile (PP-452/2011) which includes an assessment of the potential environmental impacts associated with the installation of the submarine telecommunications cable system was prepared and submitted to the Environmental Protection Department (EPD) under section 5.(1)(b) and 5.(11) of the Environmental Impact Assessment Ordinance (EIAO) for the application for Permission to apply directly for Environmental Permit (EP). The Environmental Protection Department, subsequently issued an Environmental Permit (EP- 433/2011).

Under the requirements of Condition 2.4 of the EP, an EM&A programme as set out in the revised Environmental Monitoring and Audit Manual (EM&A Manual) is required to be implemented. The EM&A programme includes water quality monitoring, marine mammal observation, coral monitoring and weekly site inspection.

2.2 WORKS PROGRAMME AND WORKS LOCATIONS

The location of the cable installation works within the boundary of Hong Kong SAR waters is shown in *Annex A*, while the location of the landing point (ie new Beach Manhole (BMH) in TKO Industrial Estate) is shown in *Annex B*. The preliminary construction programme of the Project is given in *Figure 2.1*.

Figure 2.1 Preliminary Construction Programme

		Week										
	1	2	3	4	5	6	7	8	9	10	11	12
Submarine Cable Installation												
Zone A												
Zone B												
Zone C												
Outside Zone C to HK Boundary												
Post-installation Works												
Diver Jetting												
Landing Point Construction												
Preparation Work												
Seawall Duct Work												
Land Duct Laying												
Beach Manhole Construction												
Reinstatement												

2.3 CONSTRUCTION ACTIVITIES

Submarine Cable Installation

The submarine-cable installation works started on 8 October 2012. By the end of the reporting period (ie 21 October 2012), cable installation works in Zone A, Zone B and Zone C had been finished and moved outside Zone C on 16th Oct 2012 in the evening. The cable protection work will be performed for Zone A and Zone B at the later construction stage.

Landing Point Construction

The construction works of the landing point commenced on 4 October 2012 and are temporarily scheduled to be completed in early December of 2012. A summary of the major construction activities undertaken on the landing point during the reporting period is shown in *Table 2.1*.

Table 2.1Summary of Landing Point Construction Activities Undertaken during
Reporting Period

Construction Activities Undertaken

- Excavation of seawall materials
- Installation of GI Pipe at seawall
- Lay the land duct at seawall side
- Install of Steel Mould for concreting

2.4 STATUS OF ENVIRONMENTAL APPROVAL DOCUMENTS

A summary of the relevant permits, licences, and/or notifications on environmental protection for this Project is presented in *Table 2.2*.

Table 2.2Summary of Current Environmental Licensing, Notification and Permit
Status

Permit/ Licences/	Reference	Validity Period	Remarks
Notification Environmental Permit	EP-433/2011	Throughout the construction and operation of the Project	Permit granted on 20 December 2011
Construction Noise Permit	GW-RE0774-12	18 Sep 2012 – 31 Jan 2013	Permits granted on using of registered powered mechanical equipment for 07:00- 23:00 hrs on general holidays (including Sundays) and 19:00- 23:00 hrs on any day not being a general holiday for Sub-marine cable laying works of the Project

3 ENVIRONMENTAL MONITORING

3.1 CABLE INSTALLATION WATER QUALITY MONITORING

Baseline water quality monitoring was completed by the end of September 2012. Baseline Water Quality Monitoring Reports for Zone A, Zone B and Zone C were submitted on 19 September 2012, 25 September 2012 and 1 October 2012, respectively.

Daily Impact water quality monitoring was conducted on 15 October 2012 and 16 October 2012 and ceased from 17 October 2012 onwards as the cable installation barge moved outside Zone C by the end of 16 October 2012. Details of the monitoring results are presented in the *Second Weekly Impact Water Quality Monitoring Report*.

3.2 MARINE MAMMAL OBSERVATION

Daily marine mammal exclusion zone monitoring is required to be conducted during the cable installation works taking place in daylight hours along the sections outside Zone A to Zone B (ie Zone C and from C to the boundary of HKSAR waters).

This monitoring started on 15 October 2012 when the cable installation barge entered Zone C. Every day prior to the start of cable installation, the qualified observer scanned the 250 m exclusion zone for at least 30 minutes to ensure no cetaceans in the exclusion zone. Otherwise, cable installation works should be delayed until they leave the exclusion zone. During the reporting period, no cetaceans were reported to have been observed within the 250 m exclusion zone.

3.3 CORAL MONITORING

Baseline coral monitoring was completed in September 2012. The Baseline Coral Monitoring Survey Report was submitted on 28 September 2012. Postproject coral monitoring will be conducted within one month after completion of the jetting works, with the Post-project Coral Monitoring Survey Report to be submitted within one month after completion of the marine works. Impact monitoring for coral during cable installation works is not required under the Project.

In the week of 8 October 2012 when the cable installation barge passed the identified coral communities as presented in the *Baseline Coral Monitoring Survey Report*, the nearest distances between the barge and the identified coral communities in Zone A and Zone B were 230m and 270m respectively, indicating the cable alignment of more than 180m away from the identified coral communities as required in the Environmental Permit (EP- 433/2011).

3.4 SITE INSPECTION AND AUDIT

In accordance with the revised EM&A Manual, a weekly site inspection should be undertaken at the landing point (ie new Beach Manhole (BMH) in TKO Industrial Estate) to ensure that the appropriate environmental protection and pollution control mitigation measures are properly implemented in accordance with the Project Profile (PP-452/2011). Results of the site inspection in the reporting period are provided in *Section 4*. The weekly site inspection is required to be carried out by the representatives of the Contractor and the Environmental Team (ET). A Site Inspection Log is completed by the ET representative to record whether the Contractor is compliant with environmental regulations in terms of noise, water quality and housekeeping etc (*Annex C*).

During the reporting period, the site inspection was conducted on 19 October 2012 by the representatives of the Contractor and the ET. There was no non-compliance recorded during the site audit. Major findings and recommendations are summarised as follows:

- (i) A copy of EP was displayed conspicuously at the vehicular site entrance in accordance with the requirement of Condition 1.5 of the EP.
- (ii) A silt curtain was employed around the seawall area in order to reduce the dispersion of sediments from the landing site (*Annex D Photo No.* 1).
- (iii) Fences to restrict construction activities within the construction site were erected along both sides of the land duct alignment so that disturbances caused by the Project to proximate areas would be minimised (*Annex D Photo No.* 2).
- (iv) Rubbish bin has been provided by the Contractor (*Annex D Photo No. 3*) and the construction site was found to be largely clean and tidy with rubbish seldom seen on site.
- (v) Tarpaulin sheets, which should be used to cover excavated materials and open stockpiles to prevent dust generation or erosion, were observed to be missing on the construction site (*Annex D Photo No. 4*). The Contractor was reminded to cover the stockpiles properly to prevent excessive dust generation. Also, the Contractor was advised to spray water to all exposed earth surfaces within the construction site regularly for the purpose of dust suppression. Follow-up actions by the Contractor will be checked in the next week's site inspection.

5 ENVIRONMENTAL NON-CONFORMANCE

5.1 SUMMARY OF ENVIRONMENTAL NON-COMPLIANCE

No non-compliance of PP/ EM&A/ EP/ legislative requirements was recorded during the reporting period.

5.2 SUMMARY OF ENVIRONMENTAL COMPLAINT

No complaint was received during the reporting period.

5.3 SUMMARY OF ENVIRONMENTAL SUMMON AND SUCCESSFUL PROSECUTION

No summons was received during the reporting period.

6 FUTURE KEY ISSUES

6.1 KEY ISSUES FOR THE NEXT REPORTING PERIOD

Works to be taken for the next reporting period are summarised in Table 6.1.

Table 6.1Construction Works to Be Taken For the Next Reporting Week

Work to be taken

Submarine Cable Installation

- Cable laying works to the east of Zone C until the boundary of HKSAR waters
- Landing Point Construction
- Seawall duct work
- Land duct laying works
- Beach manhole construction
- Backfilling and reinstatement

Potential environmental impacts arising from the above construction activities are mainly associated with marine water quality, dust, construction noise and waste management.

6.2 MONITORING SCHEDULE FOR THE NEXT REPORTING PERIOD

Impact water quality monitoring will cease in next week and resume when hand jetting is conducted in Zone A, Zone B and Zone C.

Next weekly site inspection is temporarily scheduled on 26 October 2012.

This **Third Weekly Site Inspection Report** presents the findings of the site inspection and other EM&A activities undertaken during the period from **15** to **21 October 2012**, in accordance with the PP (Register No. PP – 452/2011), revised EM&A Manual and the requirements of Environmental Permit (EP-433/2011).

Submarine-cable installation works/ jetting works were conducted in Zone C and from Zone C eastward to the boundary of HKSAR waters during the reporting period. Impact water quality monitoring was carried out when the cable installation works proceeded in Zone C on 15 October 2012 and 16 October 2012 and ceased from 17 October 2012 onwards as the cable installation barge moved outside Zone C. Details of the monitoring results are presented in the *Second Weekly Impact Water Quality Monitoring Report*.

Daily marine mammal exclusion zone monitoring started on 15 October 2012 when the cable installation barge entered Zone C. Every day prior to the start of cable installation, the qualified observer scanned the 250 m exclusion zone for at least 30 minutes to ensure no cetaceans in the exclusion zone. During the reporting period, no cetaceans were reported to have been observed within the 250 m exclusion zone.

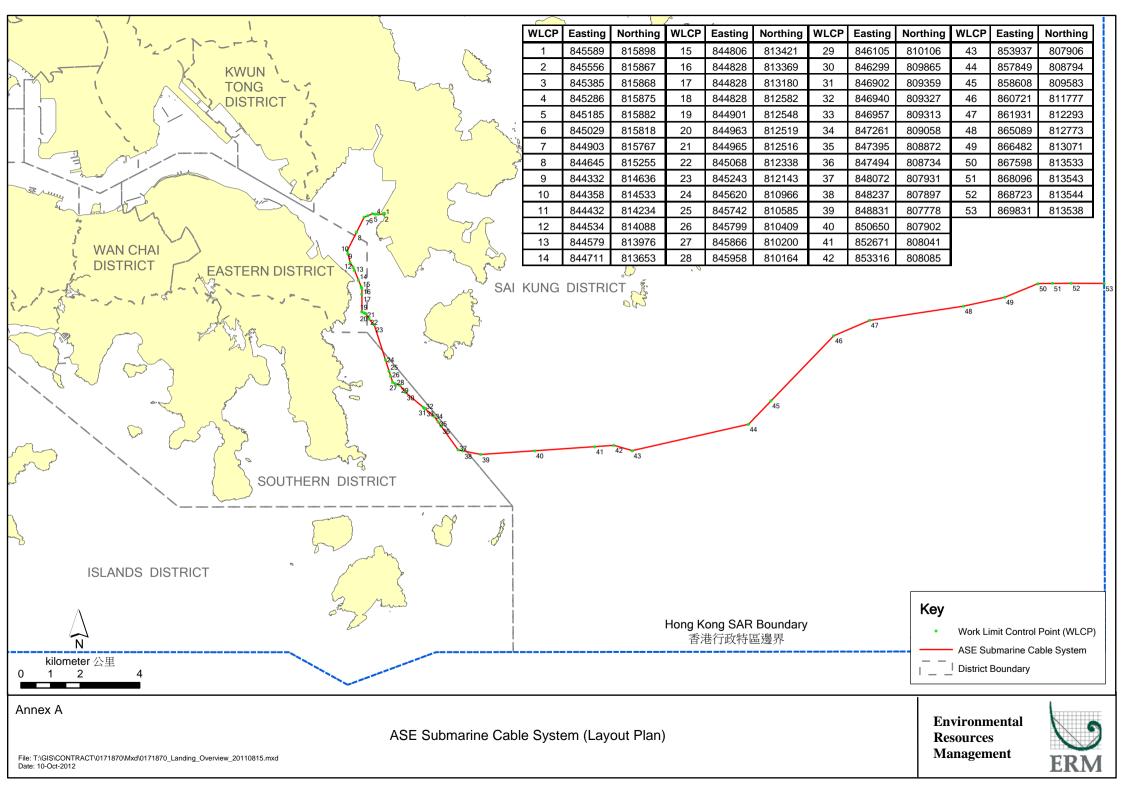
A weekly joint environmental site inspection was conducted on 19 October 2012 during the reporting period. It confirmed that the environmental mitigation measures recommended in the PP were properly implemented by the Contractor.

No non-compliance event was recorded during the reporting period.

No complaint and summons/prosecution was received during the reporting period.

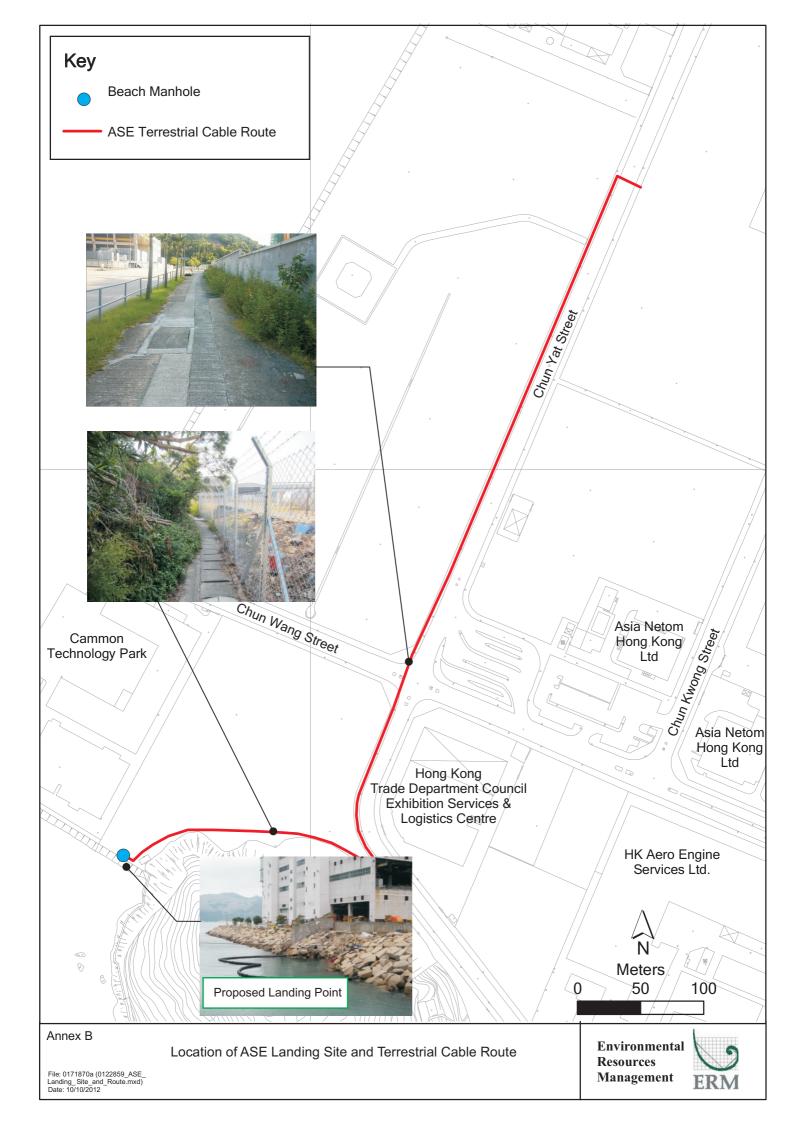
The ET will keep track on the construction works to confirm compliance of environmental requirements and the proper implementation of all necessary mitigation measures. Annex A

Proposed ASE Submarine Cable System (Layout Plan)



Annex B

Location of ASE Landing Point and Terrestrial Cable Route



Annex C

Completed Site Inspection Log 4

.....

Site: ASE - TSeung Kwan O Inspected By: Ciraul MANG							
Insp	Inspection Date: 19/10/12 Time: 15:00 16:00 (Mail 14704						
We	eather /						
Con	ondition Sunny Fine VOvercast Drizzle F	Rain Storm Hazy					
Tem	mperature 📝 ℃ Humidity 🔲 High 🛄 N	Moderate Low					
Win	ind Calm Light Meeze Strong						
A		'A or Yes No Photo/Remarks bserved					
A1	Are all plant and equipment well maintained and in good operating condition?						
A2	2 Is idle equipment turned off or throttled down?						
AЗ	A3 Are powered mechanical equipment covered or shielded by acoustic materials?						
A4	Are silenced equipment used where practicable?	\forall \Box \Box					
A5	A5 Do mobile plants be sited as far away from NSRs as possible?						
A6		Y [] []					
A7	′ Major noise source(s) Traffic で C	Construction activities inside of site					
	Construction activities outside of site	Dihers					
A8	Any remedial action undertaken?						

Site Inspection Log

here }

Asia Submarine-cable Express (ASE) - Tseung Kwan O

в	Water Quality	N/A or not observed	Yes	No	Photo/Remarks
B1	Is drainage system adequate?				
	Are there temporary ditches for runoff discharge into appropriate				
B2	Watercourse?				*****
B 3	With silt retention pond?				
84	Do permanent drainage channels have: sediment basin?				\ ,
B 5	traps and baffles?	∇			1 Silt Curtain
B 6	Are there sediment tanks for settling runoff prior to disposal?				employed in front
B 7	Are there oil interceptors in drainage system?	V			at the capie landing
B8	Oil and grease removed regularly?				point.
B9	Bypass to prevent flushing during periods of heavy rain?	\square			1
B10	Is drainage system well maintained?			\Box	
B 11	Is exposed earth stabilized after earthworks have been completed?				Not completed
B12	Are exposed slope surfaces covered (by tarpaulin or other means)?				
B13	Are open stockpiles of more than 20 m ³ covered during rainstorm?			\square	See Nrote
B14	Are manholes covered and sealed?	\square			
	Rainy Season				10.4
B15	Drainage system adequately designed for storm flow?	∇			Cursently
B16	Sediment control measures inspected and maintained after rain storms?	۲ ا			Currently ary season.
B17	Is debris and rubbish on site collected and disposed of properly?		\Box		
B18	Is wastewater discharge license available for inspection?	$\overline{\nabla}$			
B19	Measures to prevent the washing away of sand/silt to drains?		$\overline{\checkmark}$		
B20	Is there any sediment plume observed existing the marine works area?			$\overline{\checkmark}$	

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Asia Submarine-cable Express (ASE) - Tseung Kwan O

C Environmental Complaint

C1	Number of Environmental Complaint Received from/ 5	to _1 Oct =	2012	\Box	
D	General / Housekeeping	N/A or not observed	Yes	No	Photo/Remarks
D1	Are potential stagnant pools cleared and mosquito breeding prevented?	\checkmark			

Items for Inspection - Seawall Opening - Cand duct Construction Site - Construction material storage area Notes / Issues Recorded On Site Open stockpiles and excavated recks and stones during the Cand duit constructions were found to be placed aside without being covered property. The Contractor was reminded to cover all stockpiles of dusty material on site with tarpaulin or similar fabric sheets to prevent dust general. Should the Stockpiles be in active use, the Contractor should apply water regularly on the stockpiles to keep their surface wet.

Asia Submarine-cable Express (ASE) - Tseung Kwan O

Site Inspection

. 1910 - 1

Corrective Actions Follow-up aution by the Contractor will be checked in the next week's site inspection

Signatures: ET: -) (Name: YANG

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Annex D

Photographic Records on Site



Photo 1 - A silt curtain was employed around the seawall area.



Photo 3 - A rubbish bin was provided by the Contractor



Photo **2** - *Fences were erected along both sides of the land duct alignment*



Photo 4 –Tarpaulin sheets to cover open stockpiles to prevent dust generation were absent from the construction site.

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