

**Comments on Revised Landfill Charging Scheme
proposed by EPD in a Paper to the
Legislative Council Panel on Environmental Affairs
(Ref. CB(1)1811/01-02(07)) dated 27 May 2002**

This paper is a submission to Legislative Council Environmental Affairs Panel prepared by the Hong Kong Construction Association. We list out below HKCA's comments on EPD's revised proposal for the Landfill Charging Scheme.

1. We welcome the proposal to exempt all construction contracts that have been signed before the implementation of the scheme from being charged. However, the exemption criteria should be revised in such a way that all construction projects which are tendered before the enforcement date of the Regulation are also exempted from the charge.
2. The charge at \$125 per tonne will undoubtedly create additional financial burden on the construction industry particularly during the down turn of the economy. We suggest that a charge of \$60 per tonne, which represents EPD's estimated operating cost of the three existing landfills, should be adopted initially and the charge level is to be reviewed again in 12 months time
Another reason for not imposing a high level charge is, in contrast to the suggestion, the charge level will not provide an incentive, at least at the beginning, for contractors to carry out sorting of C&D materials on site due to the fact that there are never enough working space in the majority of construction sites in Hong Kong.
3. All C&D materials sorting and recycling facilities, including those proposed to be set up at Tuen Mun and Tseung Kwan O, should be conveniently available and open for use by all engaged in construction works before introduction of the Landfill Charging Scheme.
4. The landfills at SENT, WENT and NENT must have sufficient capacity to weigh in and out every truck without causing unnecessary delay.

5. For accounting purposes it is essential that accounts are billed on a construction contract basis.
6. If the Chit is valid for the day of issue only, what contingencies are in place for situations where disposal of waste at the landfill is not possible on that particular day due to delays caused by typhoons, unforeseen closure, backlog at weighbridge, long haul times, road disruption or vehicle breakdown?
7. Landfills must have contingency plans for weighbridge breakdowns, e.g. by waiving disposal charges during weighbridge downtime.
8. After all the facilities, including the C&D materials sorting, under the proposed scheme are set up, a full trial run of a sufficient length of time must be carried out to ensure that the system is functioning properly and at the same time providing feedbacks on the weight of C&D waste generated from construction projects to allow contractors with sufficient information to develop cost data for future tenders.