



香港廢物管理學會

Hong Kong Waste Management Association

P.O. Box 28705, Gloucester Road, Hong Kong

<http://www.hongkongwma.org.hk>

Legislative Council Secretariat
3/F Citibank Tower
3 Garden Road
Central
Hong Kong

Your Ref : CB2/BC/13/04
Our Ref : HKWMA/07/05/001

BY FAX ONLY (2509 9055)

Attn : Clerk to Bills Committee

19 July 2005

Dear Sir/Madam

**Bills Committee on Waste Disposal (Amendment) Bill 2005
Meeting on 26 July 2005
Written Submission**

Thank you for inviting us to present our views to the Bills Committee meeting to be held on 26 July 2005. The Hong Kong Waste Management Association (HKWMA) is the premier organisation representing professionals in Hong Kong's solid waste management industry and we take an active interest in all areas represented by our membership. We pay particular attention to the effects of legislative changes on our industry and are therefore pleased to be able to submit our views on the on the Waste Disposal (Amendment) Bill 2005 as follows :

Control of Clinical Waste

The HKWMA is supportive of the Clinical Waste Control Scheme in that it provides greater control of the transportation of potentially infectious wastes and that the trip-ticket system is a means for this control to be documented in a transparent manner.

We are in agreement that high-temperature incineration at the Chemical Waste Treatment Centre (CWTC) provides a preferable method of disposal for pathogen-containing wastes and we concur with the findings of the EIA on the CWTC. Furthermore, we fully support the User Pays Principle in all areas of solid waste management and would be pleased to see the full recovery of the variable operation cost of CWTC achieved at the earliest date.

Disposal of Imported Waste

The HKWMA is particularly concerned about the importation of non-hazardous waste for recycling, given the potential for adverse environmental impacts from recycling operations that are not adequately controlled. Furthermore, the fact that some of the waste imported for recycling ends up in our already overburdened landfills is also cause for concern – a state of affairs no doubt exacerbated by the fact that there are currently no charges for landfill disposal.

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While we support the proposal for making it an offence to dispose of imported non-hazardous waste, we would caution the need to differentiate between “waste to be recycled” and the residuals from a bona fide recycling process carried out within Hong Kong, so as to avoid genuine recyclers from being prosecuted for disposing of legitimate waste.

Provided that there will be no adverse effect on the security of supply of recyclables to the industry, the HKWMA would also like to see the number permits for the import of non-hazardous waste reduced gradually to allow an increase in the recovery rate of domestic non-hazardous waste, and for this waste to be recycled in preference.

Basel Ban

The HKWMA is supportive of the objectives of the Basel Ban and also of any moves to strengthen its application in Hong Kong.

Miscellaneous Amendments

The HKWMA has no comments to make on the proposed miscellaneous amendments, however, we wish to take this opportunity to affirm once more our support for the introduction of landfill charging for Municipal Solid Waste at the earliest opportunity.

Yours Faithfully
for Hong Kong Waste Management Association

A handwritten signature in black ink that reads "Alexi Bhanja". The signature is written in a cursive style with a long horizontal stroke at the end.

Alexi BHANJA
Vice-chairperson