

Our Ref. : D/04/071

22nd November 2004

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

Attention : **Mrs Mary Tang**

Dear Sir,

**Re : Subcommittee on Waste Disposal (Designated Waste Disposal Facility)
(Amendment) Regulation 2004 and
Waste Disposal (Charges for Disposal of Construction Waste) Regulation**

With reference to your letter (Ref : CB1/SS/2/04) dated 12th November 2004 – Invitation for Submissions of comments on the above regulations. I am writing on behalf of the Environmental Contractor Management Association (ECMA) to present our comment as set out below.

The ECMA supports the “Polluter Pay Principle” and consequently supports the Waste Disposal (Designated Waste Disposal Facility) (Amendment) Regulation 2004 and Waste Disposal (Charges for Disposal of Construction Waste) Regulation.

The charges for the disposal of construction and demolition material will affect both large and small “one man” companies. The Association is aware that Government has consulted the relevant industries representing waste transportation and construction. However, the Association believes that many “one man” companies do not yet recognise that this legislation will affect their business. The Association consequently urges Government to widely publish its intent on this matter, in particular who will be charged, so that affected parties can make appropriate plans.

Yours faithfully,

Mike Campbell
Honorary Secretary

MC/wk