
Hong Kong Waste Management Association
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Secretariat
Legislative Council
Hong Kong SAR Government
Legislative Council Building,
8 Jackson Road,
Central,
Hong Kong.

Attn. Ms Mary Tang

Dear Madam,

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

Views from Hong Kong Waste Management Association

We refer to your fax of 12 November 2004 (ref. CB1/SS/04) inviting the HKWMA to provide views on the captioned Regulations. We provide herewith for your consideration our view on the Regulations.

A. Waste Disposal (Designated Waste Disposal Facility) (Amendment) Regulation 2004

1. This Regulation sets out certain amendments to the Waste Disposal (Designated Waste Disposal Facility) Regulation which sets out the related powers for the Director of Environmental Protection to implement the charging scheme for construction waste in Government waste disposal facilities.

The HKWMA fully supports the Government initiative to charge for the disposal of waste and in particular construction waste and therefore support the Regulation.

2. Many of the amendments to the regulations are matters of housekeeping, eg delete “him” substitute “Director”.

The HKWMA supports and agrees with these amendments.

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3. The amendments include provisions to include vessels (previously vehicles only).

To facilitate bulk transfer of inert construction waste to public fill reception facilities using barges and to minimise road traffic for transportation of public fill, the HKWMA supports and agrees with these amendments.

4. The amendments under the Schedule, now Schedule 1, have added to the previous definition of designated waste disposal facilities. There are seven additional waste disposal facilities which are either construction waste sorting facilities, fill banks or temporary public filling barging points.

The HKWMA supports and agrees with these amendments as it provides more disposal outlets for different types of construction waste.

B. Waste Disposal (Charges for Disposal of Construction Waste) Regulation

1. This Regulation sets out a charging scheme, including the charge rate, for the disposal of construction waste at Government waste disposal facilities.

Part 2, Section (5), Subsection (1)(c) and (d) does not apply in respect of construction waste that is –

- (a) delivery by a vehicle owned by the Government; or
- (b) arising from the operation of a prescribed facility.

On face value it seems sensible that Government does not charge itself. However, the primary reason for the charge is waste reduction, not revenue. Should Government lead by example by charging waste generating departments, thus encouraging these departments to reduce waste generation?

Yours sincerely,
For Hong Kong Waste Management Association

James Tam
Chairman