



香港工程師學會

THE HONG KONG INSTITUTION OF ENGINEERS

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By Post and by Fax at 2869 6794

24 November 2004

Clerk to the Subcommittee
Legislative Council Secretariat
3rd Floor, Citibank Tower
3 Garden Road, Central
Hong Kong

Dear Sirs

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

Thank you for your letter of 12 November 2004 inviting the Institution to attend the meeting of the captioned subject and to put forth our views on the Regulations.

We are pleased to submit herewith our views on the Regulations in respect of those areas, which are of concern to our members. The HKIE is of the view that the proposed two Regulations would help to facilitate the implementation of the waste disposal charging scheme. Our members' concerns and views are elaborated in the enclosure for your consideration.

Yours sincerely

Ir James Y C KWAN, JP
President

Encl.

Enclosure

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

Summary of the HKIE's Views on the Regulations

The Hong Kong Institution of Engineers (HKIE) agrees that there is an acknowledged need of the implementation of the construction waste disposal charging scheme. The two proposed regulations which have laid down the introduction of the waste disposal charging scheme and the provisions of the related powers for the Government officials to implement such charging scheme for the disposal of construction waste at government waste disposal facilities are in line with the objectives of the charging scheme.

The HKIE considers the proposed waste disposal charging scheme essential which it serves as an economic incentive for waste producers (initially the construction industry) to minimise waste and to facilitate investments and development of a viable waste recycling industry (for examples the proposed construction & demolition (C&D) waste sorting facilities) in Hong Kong.

As regards the development of the waste reuse and recycling industry, we are of the view that the Government should provide financial and other incentives (e.g. in the form of cheap land, loans and preferential procurement of the recycled materials) to encourage private investments in this endeavour. We, however, maintain the view that the Government may not be suitable to be directly involved in the setting up and running of waste recycling facilities.

Whist we agree that the proposed two regulations would help to facilitate the implementation of the waste disposal charging scheme, we attach great concern on the lack of adequate actions to see the implementation of incentives and assistance in the recycling industry. We are also concerned about the risk of illegal dumping and fly tipping of C&D waste after the running of the landfill charge. To combat possible illegal dumping, the Government might consider an increase of level in penalty where appropriate penalty provisions should be stipulated in laws and in public tender opportunities to penalise wrong doers.

We would also like to suggest that the Government should make reference to current standards and practices for the minimisation of the construction wastes. For example, instead of making use of the slope-flattening method, the stabilisation of slopes by means of soil nails will be more effective for reducing a significant amount of soils to be excavated for disposal; instead of the demolition, the refurbishment of buildings should be a practical alternative which is worth promoting.