

Enclosure

**Views from the Hong Kong Institution of Engineers
on the Policy Framework for the Management of Municipal Solid Waste
for Submission to LegCo Panel on Environmental Affairs**

The Hong Kong Institution of Engineers (“HKIE”) fully recognises the concerns on waste problem and, in particular, municipal solid waste (“MSW”) problem in Hong Kong and agrees on the general directions set out by the Government to tackle the problems in a holistic manner. Having reviewed the Policy Framework for the Management of Municipal Solid Waste (“the Document”) which has outlined measures and initiatives already underway and has set out a comprehensive strategy and future plans for the MSW management in Hong Kong for the ten years from 2005 to 2014, the HKIE is in support of the government’s strategy to continue to adopt the three-tiered waste hierarchy with specific elements for the main focus on the three key targets on the waste management strategy as adopted namely:

- Target 1: waste avoidance and minimisation
- Target 2: reuse, recovery and recycling
- Target 3: bulk reduction and disposal of unavoidable waste

2. In response to the LegCo Panel’s invitation, we are pleased to submit our views on policy measures relating to the targets above as derived from the Document.

Waste avoidance and minimisation

3. The HKIE is of the view that extra efforts should be put on possible measures on waste avoidance and minimisation. In order to achieve this goal, it is apparent that supplementary incentives shall be introduced. As regards the examples of means as mentioned in the Document, the HKIE agrees that:-

- ✧ the Government should encourage the separation of plastic bags for recycling and the general public to use reusable bags instead of plastic shopping bags;
- ✧ excessive packaging, which is considered as one of the major sources of waste, must be avoided;
- ✧ disposable lunchboxes should be eliminated as soon as possible and replaced by the kinds of lunchboxes, which can be reused or recycled.

In the meantime, we are concerned about the water bottles, in particular the plastics kind are increasing rapidly in quantity. To minimise the number of water bottles to be disposed of at landfills, the Government can make reference to the arrangement in Holland where water bottles which are made from durable materials can be refunded.

4. In addition, we opine that the construction waste problem should also be addressed, although this is not part of the present policy framework, which is to deal with Municipal Solid Waste. In doing so, we advise the Government to propose

feasible measures to encourage producers to keep only minimal packaging for the construction materials. Property developers should be encouraged to consider keeping basic or even no interior decoration for the apartments to be put to the market for sale, and this helps avoid and minimise waste.

5. Noting the fact that Hong Kong population grew by an average of less than 1% each year over the past nine years but an annual average of 3% more MSW has been generated over the same period, we consider the set target to reduce the amount of MSW generated by 1% per annum up to 2014 fairly conservative. In line with various policy measures to expedite waste avoidance and minimisation, we think that the Government shall set a more ambitious target on the MSW reduction amount as more than 1% per annum.

Reuse, recovery and recycling

6. We concur with the Government's initiative to introduce producer responsibility schemes ("PRSS") as an important role in waste management strategy and as means of prolonging the useful life of the existing landfills. So much as we support the proposed support measures to the recycling industry as described under Point 95 of the Document, we suggest that the Government should provide incentives in the form of indirect tax / subsidy to encourage private investments and to stimulate the recovery and sustainable development of the recycling industry in Hong Kong.

7. The development of "circular economy" in Hong Kong, in our opinion, is a vital means to solve the waste problems and we appreciate the Government's effort to support the implementation of "circular economy", which would allow waste generated from economic activities to be returned to the consumption loop. However, in view of the current relatively slow development of recycling industries resulting in some of the sorted recyclables being end up in landfills, we would like to reiterate that the proposed measures to facilitate its development should be put in at a faster pace.

8. To speed up the growth of recycling industry as well as to facilitate a better environment for the development of "circular economy", we advise that comprehensive arrangements for regional cooperation with the Pearl Delta Region on implementation of policy measures should be made and coordinated in a long-term manner.

Bulk reduction and disposal of unavoidable waste

9. As mentioned previously in our submission in May 2005, we note an urgent need to put in place advanced treatment methods to reduce the volume of waste before disposal at landfills. We are of the view that thermal treatment facilities such as incinerators can be an effective means to serve as alternative waste disposal facilities. Although we observe that modern thermal treatment facilities are equipped with advanced and effective air pollution control systems, we advise that comprehensive studies on the feasibility of such an alternative should be made so as to ensure that the technology is environmentally safe and will not do harm to the community.

10. The HKIE also supports the implementation of composting and anaerobic digestion as an effective means to help reduce putrescible waste including food waste and other biodegradable waste to be disposed of at landfills. Noting the possible setbacks in using composting and anaerobic digestion technology owing to the limited local market needs, we suggest that compost can be partly used for local organic farming, partly for sales to the Mainland and other Asian countries, and partly for use on our country parks and green belts as fertilizer/soil conditioner.

11. In short, the HKIE concurs with the polluter-pays principle as set out in the Document. We also support that the major initiatives as proposed which can help minimise waste and facilitate development of a viable waste recovery and recycling industry.