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CB(1)734/05-06(01)

世界自然基金會
香港分會

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**LEGCO PANEL ON ENVIRONMENTAL AFFAIRS
SPECIAL MEETINGS ON 19 JANUARY 2006**

WWF Hong Kong's Comments on "A Policy Framework for the Management of Municipal Solid Waste (2005-2014)"

1. WWF Hong Kong welcomes the Hong Kong Government to take the initiative for leading to community to sustainable waste management solutions. We share deeply the concerns on the seriousness and urgency of the problems we are facing regarding to municipal solid wastes (MSW).
2. We support the "polluter-pays" principle and encourage the Government to show strong political will in implementing the proposed policy tools. We welcome the use of the waste hierarchy as the guiding principle for managing MSW in Hong Kong. In particular, we consider the Government should put more efforts to address the MSW problems at source under the avoidance and minimisation approach.
3. While generally supporting the Government's policy framework, we feel the timetable for achieving targets should be accelerated. Quite simply, the urgency of the situation is not reflected in the three 10 year targets. Hong Kong, as a small, densely populated but wealthy region, should be a world leader in waste management. Instead, we are lagging behind due to a lack of Government foresight, and lack of political will to impose environmental restrictions on business in the face of resistance from that sector.

Waste Avoidance and Minimisation

4. The Government should set up more ambitious targets for waste avoidance and minimisation. In addition to the proposed legislation on waste charging – the MSW Charging Bill, the proposed Product Eco-responsibility Bill should impose stringent

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conditions to discourage businesses and individuals from wasteful behaviours, for instance, the abuse on plastic bags and increasing trend of excessive packaging.

Reuse, Recovery and Recycling

5. WWF considers the Government should review the current waste recycling programmes on paper, plastic bottles and aluminium cans to further enhance the efficiency and quality on source separation of domestic waste. Such programmes have been ongoing for many years now but are often misused by the public, and are not readily available in many areas of Hong Kong. The scheme should also be extended to glass. The Government should also provide incentives to business to facilitate the recycling of reusable products. It could also lead the way by setting targets for its own departments, and publishing the results.
6. WWF welcomes that the Government intends to introduce mandatory Producer Responsibility Schemes (PRSs) on specific products that require particular attention. Prior to the implementation of mandatory PRSs, the pilot schemes underway should be carefully reviewed so as to optimize the product recollection and recycling efficiency in the mandatory schemes.

Bulk Reduction and Disposal

7. It is stated that the biodegradable fraction of MSW will be treated and stabilized by biological treatment such as composting and anaerobic digestion. However, as mentioned in the document, the market for the end-products from composting is very limited in Hong Kong and China. As such, apart from composting and anaerobic digestion, WWF suggests the Government to further investigate other biological treatment techniques to set up an integrated biological treatment framework for biodegradable MSW to produce various kinds of end-products such as ethanol and other bio-gases for different markets.



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8. The Government suggested that **thermal treatment** such as incineration can be one of the solutions for waste treatment in the future. WWF urges the Government to explicitly address the environmental impacts associated with incineration, and clearly inform the public. In particular, we recommend that the residual level of pollutants after the proposed treatment especially dioxin, a highly toxic by-product of incineration, should be made transparent to the public so that a wise decision could be reached.
9. Some studies are being conducted to investigate the feasibility of extending the three strategic landfills. While WWF regards **landfill extension** as an unsustainable solution for MSW management, we contend that waste management should not be used as a reason to breach our protected area system. We are in the view that the potential environmental impacts of landfill extension should be explicitly addressed at the planning stage to avoid impacts on environmentally sensitive areas such as the Country Parks, Conservation Areas and Sites of Special Scientific Interest. Landfill extension should be a last resort when all other reasonable options have been exhausted.
10. We suggest that the MSW management, implementation and law enforcement should be overseen by one single authority. In particular, we have concerns that the MSW charge may lead to more undesirable environmental impacts such as illegal dumping of waste, also known as “fly-tipping”, especially in the rural areas and agricultural lands. The Government should ensure that adequate resources should be in place for effective monitoring systems and enforcement actions to minimise such impact.
11. Resolving the current situation with regard to municipal waste is even more urgent when one considers the cost to our natural environment. The policy framework neglects to mention the cost to society of having large areas of land devoted to landfills, and the cost to our natural biodiversity of having significant amounts of waste littering



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the land and sea, with plastic bags for example smothering corals and being mistakenly consumed by marine creatures.

12. We urge Legco to support, and push for acceleration of the Government's policy framework to manage municipal solid waste. We strongly hope it will not allow vested interests in the business sector to dilute the proposed framework which will not only benefit Hong Kong society as a whole, but also our natural environment and biodiversity.