



**THE HONG KONG ASSOCIATION OF
PROPERTY MANAGEMENT COMPANIES**

香 港 物 業 管 理 公 司 協 會

25 June 2008

Your Ref : CB1/PL/EA

Mrs. Mary Tang
Clerk to Panel
Panel on Environmental Affairs
Legislative Council
Legislative Council Building
8 Jackson Road, Central
Hong Kong

Dear Mrs. Tang,

**Panel on Environmental Affairs
Special meeting on 30 June 2008**

Depositing of Inert Construction and Demolition Materials on Private Land

Thank you for your letter dated 20 May 2008 inviting us to give views on the measures to tackle fly-tipping.

The Hong Kong Association of Property Management Companies ("the Association") is always ready to support the promotion of environmental protection in the property management field. In this connection, we are writing to make a written submission to the Government expressing our views and concerns on such environmental affairs.

We consider the Government is committed to dealing with improving local environmental quality and tackling waste crime, such as "fly-tipping". The illegal disposal of waste is an anti-social behaviour that is adversely affecting the amenity of our local environment and reducing civic pride. Fly-tipping can lead to serious pollution of the environment and is harmful to human health. It can cost innocent victims of fly-tipping and the Government large amounts of money to remove the waste.

After the Shing Mun Road Incident, this land filling activity on Government land and private land using construction and demolition materials attracted many discussions between protection of private land use rights and our living environment. Hong Kong, as a major financial centre,



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we have to respect both public and private rights in using the land. In other words, we have to strike the balance in order to come up with a harmony society for continual and sustainable development.

As set out in Paper CB(1) 1557/07-08(01), there are discussions on the enhanced enforcement action that can be stepped up so as to resolve the problem. Moreover, 4 legislative options to further regulate depositing of inert C&D materials on private land are also discussed :-

- 1) Authorization prior to deposit of inert construction and demolition materials on private land ;
- 2) Legislative control through environmental impact assessment ;
- 3) Planning control on the depositing of inert C&D materials ;
- 4) Trip-ticketing system for construction and demolition waste.

Regarding the above proposed measures, we consider that there are pros and cons that the measures should be further examined. In addition, it is important to consult the relevant industries and stakeholders before any enforcement action be implemented. Basically, we would like to request the Government to step up enforcement action by means of the enhancement of inter-departmental coordination in tackling fly-tipping on private land.

Conclusion

We appreciate very much the importance of resolving the problem of depositing of inert construction and demolition materials on private land so that our living environment will not be further deteriorated. In this regard, the Association is prepared to assist the Government in coming up with the best proposal for resolving such problem. Likewise, the Association also wishes the Government could consider the comments offered above in a serious manner before finalizing the enforcement action.

Yours sincerely,

For and on behalf of

Hong Kong Association of Property Management Companies Ltd.

Andrew C. L. LEE

Chairman, Professional Practice Committee

cc: Hon Audrey EU Yuet-mee, SC, JP(Chairman)