



Legislative Council Panel of Environmental Affairs

Subcommittee on Combating Fly-tipping

It is in everyone's interest to prevent improper deposition of C&D materials on private land, and to reduce environmental hygiene problems. The Hong Kong Construction Association (HKCA) fully supports the Government's move in taking a series of actions to combat illegal land filling and fly-tipping activities. This paper is to inform members of our prevailing views on some of the enhanced measures.

Legislative Amendment Proposal

The amendments proposed to the Waste Disposal Ordinance Cap. 354 as a tool to further enhance the regulation of depositing of abandoned C&D materials on private land and inter-departmental co-ordination in respect of enforcement actions would be warmly welcomed.

The Discussion Paper CB(1) 1094/09-10(01) envisages the establishment of a notification procedure to enhance the inter-departmental mechanism but does not discuss whether and how the system can be implemented for both large-scale and small-scale depositions. The Administration should elaborate more on this.

As well, in order to enable landowners and industry stakeholders to aware of the proposed legislative amendment, we recommend that the EPD's proposal should be supported by a clear timeline for implementation.

Dump Truck Monitoring System

HKCA, in collaboration with a GPS service provider and expert, has launched a study into the effectiveness of using GPS to monitor dump trucks in disposing construction waste to designated disposal outlets.

In assessing the benefits of GPS, we see that it could offer a less expensive and more effective method to enhance current monitor practice in the long-term but would be

limited to dump trucks operating at larger construction sites only. The fly-tipping problem to small trucks for small works likely renovation, maintenance, alteration and addition works is still left unattended. We view that the fundamental problem purely lies on the economic perspective. This sub-committee may wish to consider offering small works contractors and individuals an economic incentive e.g. exemption from the Charging Scheme to encourage them to dispose construction waste at proper disposal outlets. This could be done simply by exempting small commercial vehicles from the dumping charges. Fly-tippers would then only be able to avoid the cost of transportation to the disposal site. The huge disincentive to dispose of waste material properly, being the dumping charge, would thereby be removed.

Nevertheless, HKCA supports the use of GPS to all large dump trucks in the construction sector. In an effort to encourage its use, we shall continue to develop new initiations to give support to develop a new dump truck monitoring system for our industry, and to explore ways to promote the use of GPS in major clients' projects as the next step. For this measure to reap the greatest benefits to the community, the installation of GPS on dump trucks would need to be compulsory. Our research to date suggests that this will not be prohibitively expensive. It will be necessary to consider the definition of small and large vehicles in this context to maximize the effectiveness without opening the concession to wide-spread abuse.

Trip Ticket System TTS for Disposal of Construction & Demolition Materials in Private Sector Works

There is in our view a flaw in the Construction Industry Council (CIC) draft guidelines on Trip Ticket System for Disposal of Construction & Demolition Materials in Private Sector Works that as a start the use of the Guidelines would be not mandatory but only encouraging voluntary adoption of the trip ticket system in private works projects including sub-vented projects. Unless the Guidelines becomes compulsory, it would not be easily supported by real estate developers, especially small developers as operational guidelines to improve the current situation. The Government and CIC should give serious considerations on the front.

Collective Actions in Community to Combat Fly-tipping

The best way to jolt fly-tippers out of their blatant disregard for the law and their obligation to dispose of construction waste responsibly is to instigate action from the community at large, such as encouraging whistle-blowers, and creating a reward scheme for them when reporting illegal dumping which leads to a successful prosecution.

The Hong Kong Construction Association, Ltd.

12 April 2010