

17 February 2010

Hon Audrey Eu
Chair
Panel on Environmental Affairs
Legislative Council Building
8 Jackson Road, Central
Hong Kong
panel_ea@legco.gov.hk

Regulation of depositing of abandoned construction and demolition materials on private land

Honorable Chair and Members,

We support the proposed amendments of the Waste Disposal Ordinance. However we propose the following changes to the proposed procedures and form:

Additional information to be provided by the land owner(s)

The owner(s) of the land must identify on the permission form the purpose of the material deposit and why the owner(s) considers the deposit authorized. Acceptance of the owner's permission does not constitute authorization of any material deposit.

No exemption from submitting the permission of the land owner

1. ALL depositors must be required to seek written permission of the land owner(s) and notify the Environmental Protection Department using the standard form to ensure records can be checked when needed. Exemptions based on cumulative size of the area will lead to confusion, grey areas, difficulties and cost in enforcement, etc.
2. To ensure Government time spent is reasonable and proportional, the EPD may limit internal circulation for areas under 100 sq. m. and/or certain purposes (e.g. approved small house construction).

Yours sincerely,



Paul Zimmerman
Founding Member