

Clerk to Panel on Environmental Affairs  
Legislative Council Secretariat  
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1 Legislative Council Road  
Central  
Hong Kong  
E-mail address : mpoon@legco.gov.hk

March 19, 2012

By mail and e-mail

Dear Sir, Madam,

**Submission for the Public Consultation on :  
“Reduce, Recycle and Proper Waste Management”**

**Views from  
French Chamber of Commerce and Industry in Hong Kong**

The French Chamber of Commerce and Industry in Hong Kong (FCCIHK) through its Green Business Committee (GBC) advocates for proper and responsible environmental practices and behaviours, whilst encouraging development of a “green Economy” based on sustainable development. Waste management strategies in Hong Kong not only are essential for the environment and daily quality of life of its citizens, but will also strongly influence and shape Hong Kong’s economical and industrial fabric, in particular in the recycling and cleantech sectors, which are both expected to play a significant role in tomorrow’s economy, both at home, here in Hong Kong, and in the rest of the World.

The GBC therefore recognizes the importance of the waste management strategy of Hong Kong and hereby wishes to express its views on the above mentioned subject.

The GBC has reviewed the relevant materials publicly accessible and welcomes this initiative, which addresses a fundamental issue related to waste management in Hong Kong and represents a unique opportunity to encourage waste reduction, to apply proper modern waste treatment method and to proceed without further delay.

The GBC expresses its views as follows :

**Timing:** As far as we are aware, Hong Kong has been going through a series of in-depth professional and public consultations and already launched major advanced projects, such as the Sludge Treatment Facility (STF) and the Organic Waste Treatment Facility (OWTF) Phase 1. While landfill sites in the territory are about to be exhausted, it is now both urgent and essential that Hong Kong :

- i) adopt a sustainable treatment method such as Waste-to-Energy incineration, the implementation of which may require up to 7 to 8 years to design, construct and commission,
- ii) proceed to upgrade and extend existing landfill sites – this is likely to require a long period of time from feasibility study to tender preparation,
- iii) continue to construct and develop new waste treatment facilities that contribute to material and energy recovery, such as OWTF Phase 2 or the long awaited implementation of the Waste Electrical and Electronic Equipment (WEEE),
- iv) adopt a waste charging system, the success of which requires a long process of planning, debate, legislation and
- v) encourage schemes for the local recycling business.

We take the view that time is of the essence to implement major projects and construct and operate the relevant facilities.

**Methods:** There is no single way to handle waste problems and in our view, all the above actions should be implemented concomitantly and without further delay. Hong Kong, as a premier international city in Asia, should leverage the experience of similar cities, countries or continents such as Singapore, Taiwan, Japan, Europe and USA. While the development of landfill sites has been well received in the past, it is an undeniable and proven fact that modern and advanced Waste-to-Energy incineration methods can most efficiently reduce the volume of waste and have an impeccable safety track record. International safety and emission standards (such as EU standards) are well established to govern the performance and environmental impact of such Waste-to-Energy facilities. As for European countries, waste disposal by means of landfill is being reduced and restricted to specific and non organic waste and incineration methods are widely encouraged, in addition to other significant waste reduction and recycling efforts.

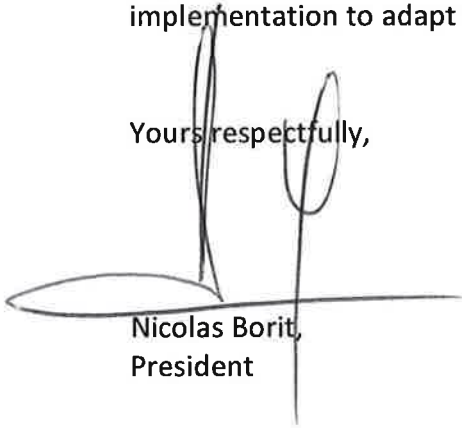
**Recycling & Re-use:** More resources should be employed and devoted to encourage and subsidize recycling businesses. Nowadays, Hong Kong has unique characteristics in that there are few industrial or manufacturing operation here in the local community. However, recycling activities in Hong Kong are currently limited to re-packaging the waste and transporting it to the Mainland or elsewhere. We strongly encourage more value-added recycling and material re-use locally. For that purpose, government should consider providing more policy support, financial subsidies, easy-to-manage approval procedures to qualified and professional operators. From the experience of some of the FCCIHK members in Europe, recycling and material re-use business operators tend to rely on Government subsidies in order to be sustainable.

**MSW charging system:** A MSW charging system is the most effective way to help waste reduction. Such a scheme will provide Hong Kong citizens with incentives to adopt new behaviours in terms of waste generation or waste reduction and will contribute to raising public awareness. It is also an opportunity to provide long term funds for sustainable and local recycling activities that generally require incentives, and to introduce Producer Responsibility Schemes (PRS) to allow operations at proper and competitive environmental and safety standards.

As a conclusion, the FCCIHK fully supports EPD's recent strategy, initiatives and measures to handle waste issues in Hong Kong using a combined and diversified approach instead of a single method. The key to a successful long term policy however is to recognize the fact that there is a time lag between now and then.

We strongly believe that more public awareness and a higher sense of corporate responsibility should be developed in parallel through Government programs such as the establishment of professional value added recycling schemes, the development and implementation of which requires policy and financial support; proper licensing and regulated system in compliance, and monitoring and evaluation throughout their implementation to adapt and readjust programmes and projects, where required.

Yours respectfully,



Nicolas Borit,  
President