



Hon WU Chi-wai, MH
 Chairman, Legislative Council Subcommittee on
 Waste Disposal (Designated Waste Disposal Facility)
 (Amendment) Regulation 2013 and Waste Disposal
 (Refuse Transfer Station) (Amendment) Regulation 2013
 Hong Kong Special Administrative Region
 Legislative Council
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Dear Chairman of the Subcommittee,

Legislative Council
Subcommittee on Waste Disposal (Designated Waste Disposal Facility)
(Amendment) Regulation 2013 and
Waste Disposal (Refuse Transfer Station) (Amendment) Regulation 2013

Thank you for the letter from Miss Angel Shek on 13 December 2013 inviting our organization, Business Environment Council ("BEC") to give our views on the Waste Disposal (Designated Waste Disposal Facility) (Amendment) Regulation 2013 and Waste disposal (Refuse Transfer Station) (Amendment) Regulation 2013.

Over the last two decades, BEC has taken a leading role in advocating environmental excellence in Hong Kong, including sustainable waste management. We are a membership-based organisation, with over 170 member companies that spans across major holding companies in Hong Kong, to multinational conglomerates, and to small and medium-sized enterprises. Some of our member companies are involved in business related to waste management.

In early 2013 BEC formed the BEC Waste Management Advisory Group ("the Advisory Group") for our member companies to focus on waste policy discussions. BEC has reviewed the paper (7) in EP CR 9/150/38 (7) submitted by Environmental Bureau/ Environmental Protection Department dated November 2013. Views expressed in this submission are those of BEC, and are based on consultation with our members in the Advisory Group but may not necessarily correlate with the views of individual members.

Views on Landfill Extension

Our views on landfill extension were expressed in BEC's submission in the 2014 Policy Address¹ as well as during the Panel on Environmental Affairs Special Meeting on 1 June 2013². The views extracted from these submissions are as follows:

¹http://bec.org.hk/files/images/Resource_Centre/Submission/CE_Policy_Address_BEC_Submission_20131031clean-pw.pdf

²http://bec.org.hk/files/images/Resource_Centre/Submission/Submission_from_BEC_to_LegCo_Panel_on_Environmental_Affairs_Eng_1_Jun_2013_final.pdf

"BEC has performed an independent analysis to estimate remaining landfill capacity from 2013 to 2022 according to anticipated quantities of waste generated over this time period.

Based on this analysis remaining landfill capacity will start to run out in 2017 if existing landfills are NOT extended. This is in fact 2 years earlier than the most recent Government estimates published in the 'Hong Kong Blueprint for Sustainable Use of Resources 2013-2022' ('the Blueprint'), further highlighting the state of our current waste crisis."

"It is regrettable that landfill extension remains as a necessary next step for the management of waste resources in Hong Kong, albeit it is a practical approach needed to deal with the imminent waste management crisis.

Landfill sites should be treated as the last resort of waste management – this has been best practice overseas for many years now. The Blueprint clearly prioritizes waste reduction, reuse, recycling and recovery with a number of policies and accompanying infrastructure projects.

The raft of initiatives proposed in the Blueprint, if successfully implemented, will help Hong Kong tackle its waste problems. However, this is only a start: it is unlikely that these initiatives can be implemented soon enough, or will have significant enough effects on Hong Kong's overall waste problems, to mitigate the need for landfill extension. The reality of the imminent waste crisis makes the need of landfill extension the only practical option in the short term. With the implementation of proper waste management solutions, this should significant prolong the lifespan of Hong Kong's landfills.

The Paper CB(1)1079/12-13(01) on Environmental Infrastructure Projects for NENT, WENT and SENT Landfills outlines costs and mitigation measures proposed by EPD for these projects. For instance, SENT Landfill, being placed at a strategic location as a waste disposal outlet, will be expanded in land size by 13%, but the composition of waste designated for disposal at this facility will be restricted to C&D waste only. This change of operation at SENT Landfill will greatly reduce odour nuisance nearby, and together with increased monitoring and mitigation measure of air particulates help to further reduce its environmental impact. BEC suggests a permanent communication and response mechanism to be established to ensure that environmental concerns from local residents and stakeholders are addressed in a timely and proactive manner."

Views on Landfill Extension Waste Disposal (Designated Waste Disposal Facility) (Amendment) Regulation 2013 and Waste Disposal (Refuse Transfer Station) (Amendment) Regulation 2013

Our previous submission supports the restriction of C&D waste at SENT Landfill. Hence BEC **supports SENT Landfill to receive construction waste only (containing no more than 50% by weight of inert construction waste)** within the context of BEC's view that the implementation of the landfill extension is unavoidable and expects the Government to implement **all** the policies and initiatives laid down under the Blueprint.



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As municipal solid waste will be diverted away from SENT Landfill, BEC **supports the proposal to reduce fees at Island East Transfer Station and Island West Transfer Station and allows Sha Tin Transfer Station to be used by registered account-hold at a prescribed fee** under the Waste Disposal (Refuse Transfer Station) (Amendment) Regulation 2013.

BEC also appreciates this opportunity to share our opinion in the hope of shaping a more sustainable future for Hong Kong.

Yours sincerely,

JOHN CHAI

Prof John Chai
Chairman
Business Environment Council Limited

c.c. Mr. WONG Kam Sing, JP - Secretary for the Environment
c.c. Miss Michelle Lee – Clerk to Subcommittee
c.c. Ms. Agnes Li – CEO of BEC