



27th December 2013

Clerk to Subcommittee on Waste Disposal
(Designated Waste Disposal Facility) (Amendment) Regulation 2013 and
Waste Disposal (Refuse Transfer Station) (Amendment) Regulation 2013

Attn: Miss Michelle Lee

By e-mail: mjylee@legco.gov.hk

Dear Miss Lee,

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

Position Of Environmental Contractors Management Association (ECMA)

This is the written submission from ECMA to the Legislative Council Subcommittee for the professional opinion and view about the above two Amendment Regulations.

(I) Waste Disposal (Designated Waste Disposal Facility) (Amendment) Regulation 2013

(1) This Amendment specifies South East New Territories Landfill (SENT) as a designated waste disposal facility accepting only construction waste of a specified type (when extension is approved). ECMA has the following views :

- All the existing daily generated 9,280 tonnes of Municipal Solid Waste (MSW) is disposing at the three Strategic Landfills (SENT, NENT and WENT). If the SENT landfill after extension will only receive construction waste, the other two landfills (NENT and WENT) will receive all the daily generated MSW. The government must provide a good reason to the residents nearby the NENT and WENT Landfills to justify this change, and propose comprehensive mitigation measures to assure the living environment at the affected community can be protected. The Government must be very caution and transparent to explain publicly how to maintain a balanced society contribution to share the responsibility on waste disposal which have a long term impact to the future public consultation of the Integrated Waste Management Facility.
- The Government should advise the public with the simulated increase in environmental burden in terms of projected increase of Refuse Collection Vehicles (RCVs) directly to the landfills, deterioration of the herb side air quality due to vehicular emission, odour nuisance and the proposed effective mitigation measures.



- The Government must assure sufficient resources and enhancement facilities be installed / invested at the NENT and WENT Landfills to receive the additional MSW whilst maintaining the highest environmental performance.
 - The government should advise the public the updated remaining operating life of both NENT and WENT Landfills if SENT landfill receives only construction wastes. This information must be technically sound and share transparently with the stake holders of the community nearby the NENT and WENT Landfills.
- (2) The Amendment requires RCVs must be equipped with specified devices (a metal tailgate and waste water sump tank) if entering into certain designated waste disposal facilities. ECMA has the following views :
- Support the amendments as this will definitely being in improvement with the odour emission and waste water leakage from the RCVs, and beneficially reduce the potential nuisance to the nearby residents
 - Support the financial subsidize to assist the installation cost incurred to the RCVs owner, but also suggest the Government to consider financial subsidize to the first maintenance inspection check to assure that these new installation are properly maintained to achieve the intended purpose.
 - Do not support that if there is an offence to this Amendments, the driver is liable to a fine of level “6” (i.e HK\$ 100,000). We considers this should be the responsibility of the RCVs owner to install and maintain these specified devices in good conditions, the legal burden should not be taken up by the driver.

(II) Waste Disposal (Refuse Transfer Station) (Amendment) Regulation 2013

The Amendment specifies the reduction of the charge for the disposal of waste at the Refuse Transfer Station (RTS) - Island West and Island East Transfer Station from HK\$ 40 per ton to HK\$ 30 per ton, and the open up of the Shatin Transfer Station for use by private waste collectors at HK\$ 30 per ton. The Amendment describes the mechanism to maximize the utilization of the Refuse Transfer Station network from the existing 71.5% to 93.3%, by diverting the FEHS collected routings to the less utilized North Lantau Transfer Station or hauling directly to the landfills. The target aim is to make available 1,800 tpd (mainly from the West Kowloon Transfer Station and some from Shatin Transfer Station) transfer station capacity. ECMA has the following views :



- The selection of waste disposal site of the private waste collector is very cost sensitive and must be economic driven. The lowering of the RTS charging at the Island West and Island East Transfer Station from HK\$ 40 to HK\$ 30 per ton is definitely not providing enough financial incentive to attract the waste hauler to use these two RTS at the HK Island. The government should consider waive all the RTS charging as the current practice of “free of charge” at the three strategic landfills. The intention for the government to recover the “marginal cost” for the operation of the RTS is in contradicting to the commitment for limiting the road traffic going directly to the landfills.
- The 3,000 per ton MSW generated from Commercial & Industrial establishments (C&I waste) has different waste nature, bulkiness and characteristics as comparing to the MSW generated domestic households. The delivery of more C&I by the private waste collectors to the RTS will bring in operating mode changes, in term of the increased number of RCVs visiting the RTS, the delivery pattern and the type of RCVs (from compaction type to open top / grab truck type without compaction), which the Government must consult the nearby community / District Board fully in advance and propose the environmental mitigation measures.
- The Government must assure sufficient resources and enhancement facilities be installed / invested at the RTS which will open to receive more C&I waste to maintain the highest operational and environmental performance.
- West Kowloon Transfer Station is the largest RTS in HK due to its vicinity to the waste sources. This station has now reached the design capacity of 2,500 ton per day, and there is great concern if the further receive of bulky C&I waste will overload the station operation, causing lengthened RCVs queuing time and deteriorated environmental performance. The traffic density impact to the nearby cargo terminal must also be addressed by the Government as on overall review study.
- The direct routing of FEHD waste collection trucks to the landfills will increase the operating cost of the sub-contractors by operating 30 additional routes. The Government must assure reasonable financial compensation be offered to the current sub-contractors for them to maintain the highest operation and environmental performance standard. There is great concern if the compensation is not enough, the collection service quality will deteriorate and cause sequential adverse impact to the nearby community.
- The changes in the collection schedule will also affect the cleaning sub-contractors who manage the Refuse Collection Rooms of the residual buildings. There may be increase resources demand to accommodate the change in collection schedule which should also be addressed by FEHD as an overall review study. The cleaning sub-contractors are earning at a very low profit margin and should not be scarify by this change.



環 保 工 程 商 會

ENVIRONMENTAL CONTRACTORS MANAGEMENT ASSOCIATION

- The waste diversion plan will definitely affect the private waste collectors and the incurred additional expense could possibly transfer to the clients. The Government must start consulting the waste collection industry immediately to collect view on their difficulty, and to establish effective measures offered to alleviate the problem.
- Support the planning to construct a new RTS at the eastern region of the Territories to provide an effective network for waste collection, transfer and disposal. This planning must receive a full attention of the Government and be implemented at the earliest possible possibility.

We hope the above opinions will be considered accordingly.

For and on behalf of

Environmental Contractors Management Association

Catherine Yan - President