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29 May 2020

Mr. Anthony CHU
Clerk to the Public Accounts Committee
Legislative Council
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Mr. CHU,

Public Accounts Committee
Consideration of Chapter 8 of the Director of Audit's Report No. 74
Provision and management of Community Green Stations

Thank you for your letter dated 20 May 2020 requesting response/information to facilitate the Public Accounts Committee's consideration of the above Chapter. Please find joint reply of the Environment Bureau and the Environmental Protection Department in the enclosure.

Yours sincerely,

(C F WONG)

for Director of Environmental Protection

c.c. Secretary for the Environment (fax no. 2537 7278)
Director of Environmental Protection (fax no. 2537 7278)
Secretary for Financial Services and the Treasury (fax no. 2147 5239)
Director of Audit (fax no. 2583 9063)

Enclosure

Director of Audit's Report No. 74
Chapter 8: Provision and Management of Community Green Stations

EPD/ENB's Responses to Questions raised by Public Accounts Committee on 20 May 2020

Questions for EPD	
Q1	According to paragraph 1.5, each Community Green Station (“CGS”) should preferably have a site area of no less than 1 500m². But as mentioned in Note 2, there are significant deviations in actual site areas: from as small as 695m², to as large as 7090m². Why is it the case? What are the differences, in terms of design, facilities, and quantity of services provided, between the largest and smallest CGSs? Do you consider the recommendation of setting the site area of CGS at no less than 1 500m² appropriate? Will you provide a detailed guideline to standardize the setting up of CGSs in the future; if yes, the timetable; if not, why not.
A1	<p>The identification of suitable site for development of a CGS in each of the 18 districts has met with great practical challenges for reasons explained in paragraph 2.6(a) of the Audit Report. The preferred size of 1 500 m² for a CGS is set having regard to areas required for delivering its core functions set out in paragraph 1.5, plus additional open space and area for landscaping. Where there are practical difficulties in identifying a suitable site with the preferred area for the development of a particular CGS, as in the case of Sai Kung and Wan Chai CGSs, EPD will, based on ArchSD's technical advice, consider the available sites and made adjustments to the accommodation requirements, e.g. reducing the size of open area and landscape zone, to ensure that the CGS can deliver its core functions despite the reduced site area. For the special case of Yuen Long CGS which occupies a site area of 7 090 m², a substantial portion of the site area is an existing woodland which matches with the environment of a CGS. EPD had thus exercised flexibility to accept the maintenance responsibility of the woodland in taking over the site.</p> <p>In future development of CGSs, EPD will continue to aim at identifying sites with the preferred areas, but will exercise flexibility where necessary as long as the core functions of CGS can be delivered.</p>
Q2	According to paragraph 2.4(b), 7 (39%) CGSs were still at planning or site selection stage, and that the target date of completion by 2017 was not met. Do you consider the situation unsatisfactory? What is the progress to date? It is also explained in paragraph 2.6, that the Environmental Protection Department (“EPD”) has been facing great challenges in site identification for CGSs. What measures had been/will be taken to facilitate the progress of site identification?
A2	<p>While it remains the Government's objective to develop a CGS in each of the 18 districts, availability of suitable sites is a practical challenge that is affecting the overall development programme. Among the seven CGSs mentioned in paragraph 2.4(b), a suitable site has been</p>

	<p>identified for the Wong Tai Sin CGS, with the support of the Wong Tai Sin District Council. Site search is still being conducted for the other six CGSs. Key challenges in site identification include, among others, competing land uses and local objection. On the first challenge, EPD is exploring the possible co-location of community recycling facilities with other government facilities. On the second, EPD has been promoting the services and benefits of CGSs to the local community, with a view to enlisting their support to the community recycling facilities.</p>
Q3	<p>According to paragraph 2.6(b), EPD was exploring alternative ways to expedite the delivery of the core services of CGSs in six districts. What is the progress to date? When do you expect the development of these six CGSs will be completed?</p>
A3	<p>For the six districts with no available site at present for development of CGS, it is envisaged that the site search and subsequent planning process will take at least several years to complete. In light of the long lead time for site identification, EPD is exploring alternative ways to deliver the core CGS services, i.e. green living education and community recycling services.</p> <p>As a pilot arrangement, EPD is exploring the engagement of those CGSs adjacent to North District and Tsuen Wan District (i.e. Kwai Tsing, Tuen Mun, Yuen Long and Tai Po CGSs) to provide educational support to the two districts later this year. Subject to the outcome of the pilot, EPD would consider implementing similar arrangement for the remaining four districts (i.e. Southern, Central & Western, Kowloon City and Yau Tsim Mong).</p> <p>At the same time, EPD is planning to expand its network of Community Recycling Centres (CRCs), which currently covers 15 districts, to all 18 districts across the territory in 2nd half of 2020. Furthermore, the Government will regularize the funding for engaging non-profitmaking organisations to operate CRCs through contracts (the CRCs are currently funded by the Environment and Conservation Fund on project basis). The enhanced CRCs will play an important role in strengthening community recycling support in districts that do not yet have CGSs.</p>
Q4	<p>Regarding the 11 CGSs mentioned in Table 3 in paragraph 2.11, how did you monitor the work progress? What had been done to facilitate the concerned contractors to complete the works on time? Was EPD or the Architectural Services Department partly responsible for the delay? According to paragraph 2.13, there was still delay in completion of works for three CGSs after consideration of extensions time granted. Can you explain the details of each case (i.e. Sham Shui Po, Tuen Mun and Kwai Tsing CGSs)?</p>
A4	<p>ArchSD is the works agent for CGS projects, and is responsible for monitoring the works progress and site supervision. EPD, as the client department, provides input to ArchSD on user specifications and other requirements from time to time, to facilitate the timely development of the works projects. We would defer to ArchSD to explain the details of cases concerned.</p>

Q5	<p>According to paragraph 2.21, stagnant water problems were observed at Eastern CGS since its commencement in 2015. Why was this so? Besides, in the course of finding a solution, there was a misunderstanding between EPD and the concerned CGS operator about the installation of artificial grass mat, please advise the reasons for such occurrence of miscommunication? Do you consider verbal notification on important issues insufficient? What measures will you adopt to improve the communication with different parties?</p>
A5	<p>The original design of the roofs of Eastern CGS allows holding of a small amount of rainwater after raining, which is expected to dry up naturally within a short period of time. The design was not welcome by the neighboring estates for aesthetic and environmental hygiene reasons, and met with persistent complaints. The operator and EPD thus sought ArchSD’s assistance to provide long-term architectural solution to address the problem (Paragraph 2.21(c)).</p> <p>At the regular coordination meeting between ArchSD and EPD, it was agreed to install artificial mat to resolve the problem. EPD informed the operator of the solution during routine verbal site communication (Paragraph 2.21(d)). On the day of commencement of the enhancement works, EPD received written objection from the operator for reasons of maintenance concerns (Paragraph 2.21(e)).</p> <p>Looking forward, EPD will strengthen the communication with the CGS operators and ArchSD, especially in drawing up of improvement works. Additional measures include the establishing single line-of-contact with ArchSD on site improvement works, organizing formal meetings with operators and ArchSD when necessary in finalizing the specifications of improvement works, and require frontline staff to have written communication with operators in confirming the specifications of site improvement works.</p>
Q6	<p>According to paragraph 3.7, operators of Sha Tin and Tuen Mun CGSs both met unexpected difficulties in meeting new contract requirements, in particular the specific quantity for outreach regular educational events and the completion time of planned special community events. Please specify in details the difficulties encountered by the operators. What had been done to assist the operators in planning and promoting the events? It is also mentioned that EPD was reviewing the contract requirements for regular educational events, and would consider adopting an overall target for on-site and outreach educational events. If the reviews were completed, what are the results?</p>
A6	<p>In the early days of Tuen Mun and Shatin CGSs, when the operators contacted local organizations to enlist their participation in “outreach regular educational events” and ask for their suggestions on venues, many of them counter-proposed to hold the events at the CGSs so that they could take the opportunity to have guided tours of the new facilities. As a result, the number of “on-site regular education events” significantly exceeded the minimum quantity requirement whereas the number of outreach events fell short of the minimum quantity requirement.</p> <p>Regarding “special community events”, which involved the collection of usable unwanted</p>

	<p>items from the public, it was Tuen Mun CGS’s original plan to collect secondhand furniture in Q2 2019. However, due to anticipated shortage of storage area for the collected items, the operator had to re-plan the event to collect items of smaller size instead, and the commencement time of event was delayed. Besides, the operator also took much longer time than expected to complete another special community event during the first contract period, which involved collection of reusable items from a university. The collection activities were temporarily suspended due to unexpected school arrangement last year, and the operator is still in liaison with the university to resume the event.</p> <p>Shatin CGS planned two special community events, which involved the collection and reuse of some usable items (old banners and rehabilitation items) for the first time in contract year 2017/18. They subsequently found that longer time was needed to establish the collection and re-use channels, and both events were only completed in the following contract year.</p> <p>EPD has been encouraging the operators to try out the collection of different reusable items for environmental reasons. EPD has been liaising with various parties to facilitate the development of new initiatives, and providing technical advice to the operators as necessary.</p> <p>Practical experience of the operators over the past few years indicate that the demand for on-site and off-site educational activities varies over time and districts, and it would be more pragmatic to adopt an overall target for both ‘on-site’ and ‘off-site’ educational activities to allow sufficient flexibility for the operators to meet prevailing local demand. EPD is conducting a review in this regard, which is expected to complete in the 2nd half of 2020. Subject to the outcome of the review, EPD will update the contract requirement in the next batch of operating contracts. EPD is also consolidating the practical experience (e.g. programming considerations) of the cases concerned with a view to sharing it with other CGS operators.</p>
<p>Q7</p>	<p>According to paragraph 3.10, different methodologies were used by EPD in counting the number of regular educational events qualified for payment for three CGSs. Were you aware of the problem before the Audit Commission (“Audit”) raised the matter? If yes, what have been done to rectify the situation; If not, why not. When would the review on counting method (paragraph 3.16(c) refers) be counted?</p>
<p>A7</p>	<p>As indicated in paragraph 3.11, EPD was aware of the adoption of a special counting method for regular educational events organized by two of the CGSs (i.e. Shatin and Kwun Tong CGSs) back in July 2016 to ensure a more balanced effort in the delivery of different education and recyclable collection services in the two CGSs, and had followed up with the CGSs concerned. EPD had been closely monitoring the situation of other CGSs and did not consider it necessary for them to adopt similar special arrangement because a more balanced effort had been observed in the delivery of different services in other CGSs.</p> <p>While EPD agrees in principle to adopt a consistent counting method for all CGSs, we have to ensure that the updated counting method would not adversely affect the capability of</p>

	CGS operators in organizing various education events. EPD will discuss with all CGS operators after education events have completely resumed their normal mode of operation having regard to the latest situation of the COVID-19 pandemic.
Q8	According to 3.17, CGSs serve an important role in supplementing the existing services of local private recyclers, by focusing their services on the collection of low economic value recyclables. But ever since the Mainland Government imposed more stringent control on waste imports, recyclables become unprofitable which hindered waste recycling activities in private market. Will you consider stepping up efforts to strengthen and improve recyclables collection services of CGSs through provision of additional resources or other measures?
A8	<p>Apart from CGS operators, there are other parties such as commercial recyclers taking part in provision of recyclable collection services to housing estates. The role of CGS operators is to complement local recyclers, local recycling shops and existing recycling programmes run by NGOs, green groups, etc., rather than competing with them.</p> <p>The sluggish global recycling market in recent years has certain impact on the operation of the local recycling trade. In view of this, the EPD will invest more resources to support local recycling, including the introduction of waste paper collection and recycling services in the second half of 2020 and a 2-year “Pilot Scheme on Collection and Recycling Services of Plastic Recyclable Materials” in three different districts (i.e. Eastern District, Kwun Tong and Sha Tin). Contractors are engaged under service contracts to implement the central collection services to enhance the cost-effectiveness of processing of the recyclables and to raise public confidence in the waste separation and recycling system. Other than providing support to the recycling industry, we believe these measures will also benefit the CGSs to collect more recyclables.</p>
Q9	According to paragraph 3.28(b)(iii), EPD was exploring a suitable approach for provision of mobile collection points at public places for adoption in future CGS operating contracts. What is the progress so far? What are the outcomes?
A9	EPD is studying the effectiveness of providing recyclable collection points at specific time and locations (定時定點回收站). The study is expected to complete by end 2020. Subject to the outcome of the study, EPD will request CGS operators to set up more such mobile collection points under the CGS contracts, thereby enhancing the community recycling support at district level.
Q10	According to paragraph 3.38(a), EPD explained that resources were diverted to provide outreach regular educational events in addition to on-site regular educational events. Please tabulate as Table 11, the numbers of persons served by outreach activities of the five CGSs concerned from May 2015 to June 2019. Can you explain why expected number of persons served by the new outreach activities had not been set (paragraph 3.39 refers)? Have you completed the review on the current reporting requirement (paragraph 3.45(b) refers) so as to better access both on-site and off-site

	services provided by CGSs? If yes, what are the review results? If not, when will the review be completed?																																															
A10	<p>The number of persons served by outreaching activities are tabulated below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="5">No. of persons served by outreach activities^[note]</th> </tr> <tr> <th>Sha Tin CGS</th> <th>Eastern CGS</th> <th>Kwun Tong CGS</th> <th>Yuen Long CGS</th> <th>Sham Shui Po CGS</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>668</td> <td>1154</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>2016</td> <td>6640</td> <td>7338</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>2017</td> <td>6677</td> <td>10912</td> <td>3711</td> <td>5254</td> <td>4309</td> </tr> <tr> <td>2018</td> <td>6264</td> <td>14316</td> <td>5034</td> <td>1378</td> <td>4024</td> </tr> <tr> <td>2019 (up to June)</td> <td>5008</td> <td>4424</td> <td>1751</td> <td>3582</td> <td>800</td> </tr> <tr> <td>Operation commencement date</td> <td>May 2015</td> <td>August 2015</td> <td>January 2017</td> <td>January 2017</td> <td>October 2017</td> </tr> </tbody> </table> <p>Note: Outreach activities include regular educational events, featured educational events and special community events (if applicable) held outside CGS venues.</p> <p>Under the CGS operating contacts, targets are only set for the total number of educational events to be organized, rather than the total number of participants as the latter is beyond the control of the CGS operators. However, to encourage CGS operators to reach out to organizations / schools etc. in the respective districts in providing educational services, which we believe can attract more participants, separate targets have been set for ‘on-site’ and ‘outreach’ educational events since November 2017.</p> <p>As mentioned in the reply to 6) above, EPD will complete a review on the suitability of adopting an overall target for both ‘on-site’ and ‘off-site’ educational activities in 2nd half of 2020 and, subject to the outcome, update the contract requirement in the next batch of operating contracts.</p>	Year	No. of persons served by outreach activities ^[note]					Sha Tin CGS	Eastern CGS	Kwun Tong CGS	Yuen Long CGS	Sham Shui Po CGS	2015	668	1154	N/A	N/A	N/A	2016	6640	7338	N/A	N/A	N/A	2017	6677	10912	3711	5254	4309	2018	6264	14316	5034	1378	4024	2019 (up to June)	5008	4424	1751	3582	800	Operation commencement date	May 2015	August 2015	January 2017	January 2017	October 2017
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Q11	According to paragraph 3.42, EPD would review and revise the relevant contract specifications as there had been notable changes in the community’s demand for visitors reception services. What were the changes? Have you completed the review? What are the results?																																															
A11	Based on our review of visit reception service in different CGSs, we note that the demand has been generally less than expected, especially after the CGS has been set up for some time and the residents nearby are familiar with the facility. Besides, under the current practice, general reception service is provided at CGSs when they handle service enquiries at the counters; brief introduction of CGS facilities is also provided to participants of regular onsite educational events. As such, the demand for solely visitor reception services has been consistently low.																																															

	Subject to further exchange with CGS operators, EPD would update the contract specifications relevant to visitor reception services in the next batch of operating contracts.
Q12	According to paragraph 4.10, EPD will take forward three audit recommendations with regards to the inspection of CGSs. In this regard, have you set out timetables on the implementation of these new practices? What progress has been made so far?
A12	Taking into account of Audit's recommendations, EPD plans to update the existing operating guidelines and develop electronic inspection form for routine inspection of CGS activities. We aim to complete the above tasks by Q4 2020.
Q13	According to paragraph 4.17, Audit noted that there was delay in submission of monthly reports, annual summaries of monthly reports and audited financial statements. Were you aware of the late submission before Audit raised the matter? If yes, what have been done to rectify the issue? As stated in paragraph 4.18(a), the existing arrangements on report submission will be reviewed. Has the review been conducted? What are the results? What other measures would you take to ensure CGS operators' compliance with the reporting requirements?
A13	EPD is aware of the delay of report submission by CGS operators. However, for reasons explained in paragraph 4.18(a), we agree that they may have practical difficulties in adhering to the submission deadlines. In view of the practical difficulties, EPD is considering adopting a phased submission approach to address the situation and will further discuss the issue with CGS operators at the regular liaison meetings. Subject to the outcome of the discussion, EPD would consider making suitable adjustments to the standard contract requirements, having regard to both the need for timely monitoring by EPD and practical constraints faced by the operators.
Q14	According to paragraph 4.24, Audit noted that there was no documentation for experience sharing meetings chaired by EPD and held with CGS operators. Why is it the case? Please provide details and number of sharing meetings that have been held in the past five years. Will you consider, as Audit suggested, promulgating a practice guide to CGS operators? If yes, the details; if not, why not.
A14	<p>Since 2017 when more CGSs commenced operation, two meetings have been held every year with all CGS operators. Also, there have been informal sharing of operational practices among different CGS operators from time to time, especially in the introduction of new services. As these sharing sessions were conducted on informal basis, no record of the discussion was prepared in the past.</p> <p>Now with nine CGSs in operation, EPD sees the need to establish a more formal platform for all CGS operators to exchange their operational experience. EPD would also consolidate and disseminate the good practices of individual CGS operators, with a view to improving the services of CGSs.</p>

Q15 According to paragraph 4.28, the quantities stated in Bills of Quantities for both educational and recyclables collection services of nine CGSs exceeded the minimum service requirements. Do you consider such deviations unsatisfactory? Concerning the nine CGSs, what were the rates of the recyclables collection services and environmental educational services, the actual quantity of services provided during contract periods, and amounts of actual payment to the operators? Do you have any plan to review the specification of the quantities stated in Bills of Quantities and the minimum service requirements for CGS services? If yes, the details and timetable. If not, why not.

A15 For the reasons explained in paragraph 4.29, we consider it justifiable to build in a higher level of difference between Bills of Quantities (BQ) (ie maximum service quantity) and minimum service quantity required in the first contracts of the first five CGSs to allow the operators to organize more activities having regard to local community’s acceptance of the initial operation of the CGSs. With the availability of operation track records of the first five CGSs, the level of difference between the BQ and minimum service quantity has been substantially reduced in subsequent contracts. EPD will continue to keep under review the specification of quantities in BQ and the minimum service requirements in future CGS operating contract.

As each of the operation contracts of CGSs have been awarded through tendering process, the rate of recyclable collection services and environmental educational services varies from CGS to CGS. The actual quantity of services provided during contract periods are detailed in the monthly reports of the CGS operators, with consolidated summary tabulated below:

CGSs with first operating contract completed	No of environmental education events organized under the first contract	Total payment for environmental educational services under the first contact (thousands)	Quantity of recyclables collected under the first contract (tonnes)	Total payment for recyclable collection services under the first contact (thousands)
Shatin CGS	1 284	2 158	771	1 759
Eastern CGS	927	130	828	294
Kwun Tong CGS	499	345	981	820
Yuen Long CGS	482	1 274	1 009	1 214

Question for ENB

Q20 According to 3.17, Community Green Stations (“CGSs”) serve an important role in supplementing the existing services of local private recyclers, by focusing their services on the collection of low economic value recyclables. But ever since the Mainland Government imposed more stringent control on waste imports, recyclables become unprofitable which hindered waste recycling activities in private market. Will you consider stepping up efforts to strengthen and improve recyclables collection services of CGSs through provision of additional resources or other measures?

A20	<p>The sluggish global recycling market in recent years has certain impact on the operation of the local recycling trade. In view of this, the EPD will invest more resources to support local recycling, including the introduction of waste paper collection and recycling services in the second half of 2020 and a 2-year “Pilot Scheme on Collection and Recycling Services of Plastic Recyclable Materials” in three different districts (i.e. Eastern District, Kwun Tong and Sha Tin). Contractors are engaged under service contracts to implement the central collection services to enhance the cost-effectiveness of processing of the recyclables and to raise public confidence in the waste separation and recycling system. Other than providing support to the recycling industry, we believe these measures will also benefit the CGSs to collect more recyclables.</p>
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