香港工業總會
Federation of
Hong Kong Industries

Mrs Mary Tang   18 February 2002

Clerk to the Environmental Affairs Panel

Legislative Council

3/F, Citibank Tower

3 Garden Road

Central

Hong Kong

Dear Mrs Tang,

Technical Memorandum under the Water Pollution Control Ordinance

Thank you for your letter dated 31 January 2002 inviting our views on the proposed amendments to the Technical Memorandum (TM) under the Water Pollution Control Ordinance.

First of all, we welcome the Environmental Protection Department (EPD) taking steps to simplify and streamline the effluent standards laid down in the TM.

However, our members in the textiles industry generally believe that to remove the effluent standards on companies discharging above 1000 cubic metres per day in far from a satisfactory arrangement in terms of compliance.   Under the revised TM proposed by the EPD, there would no longer be any effluent standards prescribed for such high volume dischargers, with the EPD fixing conditions to their licences on a purely case-by-case basis.

Our members feel that the absence of clear effluent standards in the TM would create a great deal of uncertainty for manufacturers whose effluent flow is between 1000 and 6000 cubic metres per day.   They are also worried that the EPD might impose severe discharge requirements when their licence is renewed.

As a matter of principle, the Federation fully supports the Government in its endeavours to simplify and streamline regulations on business.   This, however, should be done in such a manner that any possible uncertainly is minimised.   It is also important that our laws do not give the Government excessive flexibility in exercising its powers.

As far as the present amendments are concerned, we recommend that the effluent standards in the Tm for discharge of up to 2000 cubic metres per day be maintained.   This, we believe, will preserve the purpose of simplifying the TM, while keeping the number of establishments affected by it to a minimum.

Yours sincerely,

V.C. Davies
Director-General