



2004/4/22

To: LEGCO 2003 Bills Committee on Waste Disposal (Amendment) (No. 2)

Friends of the Earth (HK)'s Comments on and Recommendations for the Proposed
Construction Waste Disposal Charging Scheme

1. Friends of the Earth (HK) fully supports the Construction Waste Disposal Charging Scheme, which, if implemented, will legally endorse the “polluter pays” principle and will be an effective pollution-abatement measure. The Scheme will curb externalities imposed on the environment and third parties as a result of polluting actions, and will help effectively deter dumping of construction and demolition waste, which constitutes the greatest percentage of Hong Kong’s overall solid waste (2002: 48%)
2. The Civil Engineering Department recently estimated that the two temporary inert construction waste landfills could be filled to its capacity by the end of 2004. It is projected that by 2008 there will be an accumulation of 53.4 million tonnes of inert waste with no disposal outlet. This figure is equivalent to 7 times the total waste volume of Hong Kong in 2002. If there is no effective means to curb the generation and dumping of construction waste at this critical time, the problem of construction waste will become unmanageable and will cause irreparable damage to our environment.
3. The Scheme aims to provide an economic incentive for waste producers to reduce

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waste generation, and to facilitate reuse or recycling. However, without effective measures to ensure strict observance of the future stipulation, it may aggravate the problem of illegal waste dumping. Measures to strengthen control against illegal dumping should be enacted together with the Scheme, and reviews should be conducted to examine the deterring effects it may have on polluters.

4. There exists no legislative regulation on construction waste dumping in the name of “Filling / Storage” in privately owned farmland. Without a clear distinction between “Filling / Storage” and “Construction Waste Disposal” we will face a plausible scenario where the New Territories could be turned into the biggest waste dumping ground.

We urge the government to establish cross-departmental working committees to tackle the above concerns.

5. We call for stringent guidelines for public and private construction project contracts to make clear indication for their waste disposal procedures to prevent illegal and irresponsible waste disposal.
6. The Waste Disposal Charging Scheme should be one but not all of the government waste management initiatives. This particular regulation presents an end-of-pipe solution. To effectively resolve the current waste problem, the government must take a comprehensive and long-term view of planning and implementing a waste

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management system for Hong Kong's sustainable development.

7. To achieve considerable construction waste reduction, the government should step up construction waste treatment at its source using more pro-active strategies. We urge the government to take the following actions:

- (1) Encourage construction developers to economize material use from the perspective of resource conservation. A reward system should be established to recompense environmentally responsible developers, and those developers should be given prior consideration for tender of government projects.
- (2) Promote wider applications of recycled concrete blocks.
- (3) Provide longer term construction materials sorting sites for sorting and recycling.

8. On March 31 the Hong Kong SAR Government signed a "Cooperation Agreement on Cross-boundary Marine Dumping" with the State Oceanic Administration (SOA). We would like to re-emphasize that the Hong Kong SAR Government has the responsibility to monitor its entire implementation process to prevent our construction wastes from becoming the source of irresponsible ecosystem destruction elsewhere across the border.

End

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