

Business Environment Council (BEC)
Proposed Construction Waste Disposal Charging Scheme

BEC's Comments

1. The BEC fully agrees with the construction waste disposal charging approach as an efficient way to encourage waste producers to reduce their volume of waste they create.
2. In particular, the BEC believes that a construction waste disposal charging scheme will help develop recycling in Hong Kong, by making it a more attractive option than it is currently the case.
3. As a consequence, the BEC fully supports the *concept* of the construction waste disposal charging scheme that is described in the document proposed, concerning construction wastes.
4. However, the BEC would like to comment on the following key elements of the proposed scheme.

4.1. Visual assessment of inert waste content

The BEC understands the difficulty of implementing a control of the waste content at the gate entrance, and therefore the proposed visual control approach. However, the BEC would like to insist on the limited efficiency of a visual control, which can lead to a number of difficulties, such as prejudiced assessment, discrimination between waste producers, fraud and logistics issues (queues at the landfill gates, etc.). It is therefore strongly advisable to guarantee that visual control will only be carried out by recognised, experienced and trained operators, which will be agreed by the Government.

4.2. Practical implementation at the landfills

In practice, the implementation of a construction waste disposal charge for one category of waste only will generate some disturbance at the landfill gates, as some waste will be accepted free of charge and some others (construction waste) assessed and charged. The BEC would like to have more information about the practical plans at the landfills.

4.3. Illegal dumping (fly-tipping)

With the implementation of a construction waste disposal charge for construction wastes, a strong pressure will be placed on an already very competitive business. The BEC fears that some construction companies, in particular some small ones, might be tempted to avoid the construction waste disposal charge to remain competitive. Some may even consider "using" this tax to become more competitive than bigger, more ethical contractors. The BEC would like to draw the Government's attention on the subsequent risk which will be created that such companies may look for illegal ways/places to dispose of their wastes. Illegal dumping will inevitably increase and the Government should plan early control measures to avoid it.

4.4. Monitoring of the scheme

As a consequence of the above mentioned issues, the BEC wishes to insist on the importance of monitoring measures to follow up the implementation of the construction waste disposal charging scheme. This monitoring system should include regular checks on waste acceptance procedures, verification of waste volumes, strict control of illegal dumping, and verification of the integration of waste management into construction contracts.

4.5. Recycling option

Landfilling and public filling are passive ways of waste management. To enable better waste management, recycling (both in Hong Kong and at other countries) should be encouraged as the ultimate solution. To facilitate recycling business, the outlet of the recycled products should be guaranteed. For example, the use of recycled aggregates in construction is well established in overseas, being the largest developer in Hong Kong, the government is encouraged to accept and give incentive to contractors to adopt the use of recycled aggregates in their public work projects.

Conclusion

The BEC believes that construction waste disposal charging is the appropriate way forward to significantly progress towards an optimised use of Hong Kong's landfill voidspace; however, the elements listed above will need further organisation in order to make the scheme sustainable.