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Your Ref : CB1/PL/EA  
 Our Ref : HKWMA/01/2006

**BY EMAIL ONLY**

Attn : Clerk to Panel

10 January 2006

Dear Sir/Madam

**Panel on Environmental Affairs  
 Special Meeting on 19 January 2006  
 Written Submission**

Thank you for inviting us to present our views to the special meeting of the Panel on Environmental Affairs to be held on 19 January 2006. The Hong Kong Waste Management Association (HKWMA) is the premier organisation representing professionals in Hong Kong's solid waste management industry and we take an active interest in all areas represented by our membership.

We pay particular attention to the effects of proposed changes on our industry and are therefore pleased to be able to submit our consolidated views on the Policy Framework for the Management of Municipal Solid Waste (2005-2014) as follows :

1. HKWMA concurs with the Government's view that the problems of MSW are imminent and should be dealt with as a top priority.
2. The Government's three strategic objectives as set out in the Policy Framework, together with our views, are outlined below:-
  - a. Objective 1. To avoid generating waste at source; to facilitate the recovery and reuse of material and the recycling of non-reusable material. **HKWMA supports this objective provided that there are sustainable markets for recovered and recycled materials** and that such materials do not end up in landfills due to the lack of credible and environmentally meaningful outlets.
  - b. Objective 2. To apply the "polluter-pays principle" as a means of reducing volumes of waste for disposal. **HKWMA supports this objective** but is concerned how enforcement can be achieved in practice.
  - c. Objective 3. To adopt advanced technologies and practices to treat waste requiring final disposal and to create new economic opportunities. **HKWMA supports this objective provided that the waste management hierarchy**



**is adhered to** such that the drive for economic opportunities related to waste disposal does not transcend avoiding, minimising, reusing, recovering and recycling waste.

3. With regard to the three targets, HKWMA has the following views:-
- a. Target 1. HKWMA does not feel that the target to reduce the amount of MSW generated in Hong Kong by 1% per annum up to the year 2014 (based on the 2003 levels) is particularly ambitious. According to EPD's own data (Ref. Plate 3.1, *Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2004*) the quantity of MSW generated (i.e. that disposed of in landfills plus that recovered/recycled) fell from 5.83M tonnes in 2003 to 5.71M tonnes in 2004, a decrease of 2%. Although 2005 data is not yet available, from 2003 and 2004 data it would appear that existing measures are already capable of reducing the quantity of waste generated, and the new proposals identified in the Policy Framework (paragraphs 69 to 73) would further reduce the quantity of waste generated. Given the commendable reduction since 2003, **it is HKWMA's view that consideration should be given to increasing the annual targets for reduction of MSW above the 1% proposed in the Policy Framework.**
  - b. Target 2. The 40% recovery rate for MSW stated in paragraph 1 is a composite figure for domestic, commercial and industrial wastes. Only 14% of domestic waste is actually recovered (paragraph 45), which is low compared to other countries, both regionally and globally. In particular, our recycling rate for glass is one of the world's lowest. As these very low recovery rates for domestic waste were acknowledged (paragraph 46), **it is HKWMA's view that separate targets for domestic waste should be specified in addition to those for total MSW.** While further study would be needed to justify meaningful targets for domestic waste, the HKWMA feels that a 2014 target in the region of 30% may be attainable.
  - c. Target 3. At present, 60% of MSW is disposed of in landfills and the target in 2014 is 25%. While this will reduce the demand for landfill capacity and thereby extend the life of the existing landfills, this is only part of a bigger picture. The disposal of construction waste in landfills, at SENT landfill in particular, is a major reason why the landfills have filled up faster than planned. While we acknowledge that the Policy Framework focuses on MSW, there is repeated reference to the lack of remaining landfill capacity and so **it is HKWMA's view that reducing the quantity of construction waste disposed of in landfills is of equal importance to reducing the quantity of MSW** in prolonging landfill life. Furthermore, the landfills in Hong Kong have been designed to safely accommodate putrescible waste and so disposal of inert material is an inappropriate and wasteful practice. While it is too early to identify whether there has been a significant reduction in the quantity of construction waste disposed of in landfills as a result of the charging scheme for construction waste, **it is HKWMA's view that the quantity of construction waste that is disposed of in landfills should also subject to a series of reduction targets** similar to those for MSW. Completion of the first year of operation of the construction waste charging scheme would be an appropriate time to examine its impact and to evaluate further reduction targets.



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4. HKWMA fully supports the introduction of legislation in 2007 to provide for MSW charging. However, we have a number of reservations regarding the use of pre-paid waste disposal bags (paragraph 72) as this would, by definition, result in more plastic bags requiring disposal of and thereby increase the already high quantity of plastic bags currently being disposed of. Furthermore, there are mixed reports from similar overseas experience that indicate the possibility of serious shortcomings in the pre-paid waste disposal bag system, notwithstanding the encouraging official statistics. Given that legislation is to be introduced to LegCo next year, **it is HKWMA's view that methods for MSW charging that meet Hong Kong's unique characteristics must be examined, developed and agreed as a matter of urgency.**
  5. Waste avoidance and minimisation at source is the most cost-effective method to reduce the quantity of waste disposed of at landfills. Hence, public education and partnership with the community and businesses as proposed in the Policy Framework (paragraph 48) should be implemented without delay. Source separation of waste is the most effective means of improving the recovery rates for domestic waste and thereby reducing the quantity of MSW that is disposed of in landfills. We fully support the target of 80% of the population taking part in source separation by 2010 (paragraph 88) and **it is HKWMA's view that a higher target for 2014 should be specified.** While acknowledging the logistical constraints in some locations, in due course we would also like to see source separation extended towards 100% of the population.
  6. We support the development of IWMF by adopting incineration as the core technology in order to substantially reduce the volume of the waste. Given the acute shortage of landfill space, **it is HKWMA's view that planning for one incinerator of modest capacity should commence now.** Notwithstanding, **it is also HKWMA's view that exhaustive efforts should be made to implement territory-wide source separation before the final incineration capacity is determined.** The selected incineration technology should have the following characteristics:-
    - a. It must utilise state-of-the-art technology to ensure compliance with the most stringent emission standards world-wide. **It is HKWMA's view that real-time stack monitoring results should be made available by the Operator to the regulatory authority, who should then make the results available to the public.** This transparent approach should allay fears regarding air pollution and thereby reassure neighbouring communities.
    - b. The volume of solid residues (ash) produced should be kept to a minimum in order to reduce the demand for landfill space. Subject to findings of an Environmental Impact Assessment, **it is HKWMA's view that development of ash monofills should be considered, either as part of the landfill expansion projects or at new sites,** with appropriate pollution control.
    - c. Any hazardous materials, particularly in fly ash, should be treated prior to disposal to avoid hazardous leachate.
  7. The siting of an incinerator will always be a source of contention yet nothing has been said in this regard in the Policy Framework. HKWMA therefore wishes to put forward the following views. Firstly, if an incinerator is to be built in an industrial area **it is HKWMA's view that low-pressure (waste) steam should be made**
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**available for industrial processes**, such as textile-dyeing and paper recycling that have high heat demands. This may attract industries to remain in Hong Kong to make best use of the CEPA. Secondly, if an incinerator is to be built close to residential areas **it is HKWMA's view that the facility should provide tangible benefits to the local community**. An impressive example of this is the Asahai Clean Centre, a gasification plant located in a residential suburb of Tokyo that provides a swimming pool and health spa facilities that are much appreciated by the local community. Thirdly, **it is HKWMA's view that the construction of a number of smaller incinerators serving individual Districts/Regions may be more acceptable to the public and should be considered** in addition to the option of one large, centrally located facility.

8. We do not dispute landfill to be the final means of disposal under any future waste management scenario. However, further review and investigation must be carried out in order to keep the scale of landfill extensions and/or new sites to a sustainable level in the long-term.
9. Government aims to commission the first phase of the IWMF in mid 2010s (paragraph 112), however, there is no indication as to the capacities of the plants, their proposed locations, or the mix of technologies that form the IWMF. Furthermore, there is no indication as to the relative costs for treatment at each type of plant within the IWMF. **It is HKWMA's view that, during subsequent public consultation, the cost per tonne (on a full cost recovery basis) for each of the proposed waste treatment technologies within the IWMF should be made available** in order that the public are in a position to make a more informed response when consulted. We are also concerned as to whether there is sufficient time to achieve the mid 2010 target date, given the requirements of various statutory processes and public consultation, not to mention site search, design, contracts, tendering, construction and commissioning of each plant. **It is HKWMA's view that that a draft implementation timetable should be provided now**, showing how each of these elements can be programmed to meet the mid 2010 target date.
10. The construction of EcoPark is a good starting point for promoting the recycling businesses and HKWMA fully supports it. However, Phase I, to be commissioned in late 2006 (paragraph 96), will have no more than 4ha of land available for tenants and Phase II will not be commissioned until late 2009. The reason for the delay to Phase II is that a Fill Bank is occupying the site and is not planned to be removed until early 2009. HKWMA is concerned that the 4ha in EcoPark Phase I may be perceived as insufficient for the recycling industry and that 2009 may be considered too long to wait for Phase II. Notwithstanding the potential need for double-handling of material, **it is HKWMA's view that the part of the Fill Bank now occupying land for Phase II of EcoPark should be removed as soon as possible** such that Phase II can be commissioned shortly after Phase I.
11. As mentioned above, HKWMA supports the "polluter-pays" principle, however, we do not agree with the intention of the Government to link the implementation of the IWMF with the implementation of the "polluter-pays" principle (paragraph 112). There will be different opinions on MSW charging within the community and so it may take considerable time just to reach consensus, not to mention enacting legislation. HKWMA simply does not want to see any delay to the IWMF compounding the capacity shortage in the landfills.



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The Policy Framework will be difficult and controversial to execute but this must not delay its implementation, or lead to a watering down of its targets. To reiterate, **HKWMA fully supports the Government's strategy and the three objectives as set out in the Policy Framework.** However, we feel that certain targets may not adequately reflect the urgency of Hong Kong's waste management issues, as we have briefly commented above.

We trust that HKWMA's views will be given due consideration by the Panel.

Yours Faithfully  
for Hong Kong Waste Management Association

A handwritten signature in black ink that reads "Alexi Bhanja". The signature is written in a cursive style and is positioned to the left of a vertical red line.

Alexi BHANJA  
Chairman