



CMA's Comments on the Policy Framework for the Management of MSW

The Chinese Manufacturers' Association of Hong Kong refers to the Policy Framework for the management of municipal solid waste published in December 2005 and has pleasure in submitting our consolidated views on the Policy Framework as follow:

1. The Association concurs with the Government's view that the problems of MSW are imminent and should be dealt with as a top priority.
2. In general, we fully support the Government's strategy and the three objectives as set out in the Policy Framework which include:
 - To avoid generating waste at source; to facilitate the recovery and reuse of material and the recycling of non-reusable material
 - To apply the "polluter-pays principle" as a means of reducing volumes of waste for disposal
 - To adopt advanced technologies and practices to treat waste requiring final disposal and to create new economic opportunities
3. The Association also agrees with the 2nd target as set out in the Policy Framework to increase the recovery rate of MSW to 45% by 2009 and 50% by 2014. However, for the 1st target to reduce the amount of MSW generated in Hong Kong by 1% per annum up to the year 2014, and the 3rd target to reduce the total MSW disposed of in landfills to less than 25% by 2014, we consider that both targets should be set further higher in order to extend the lives of the landfills.
4. Waste avoidance and minimization at source is the most cost effective way in MSW management. Hence, public education and partnership with the community and businesses as proposed in the Policy Framework should be implemented without delay. The sorting of waste at source should also be promoted to general public through launching campaigns as this will affect the effectiveness and cost in the reuse, recovery and recycling.
5. The Association supports the development of Integrated Waste Management Facilities (IWMF) by adopting "incineration" as the core technology in order to substantially reduce the volume of the waste. The selected "incineration" technology should have the following characteristics:
 - It must be the most state-of-the-art technology in order to ensure the compliance of the most stringent emission standard

- The volume of solid residues (ash) produced should be kept minimum in order to reduce the loading to the landfills
 - The ash produced should not contain hazardous materials such as heavy metals and dioxin which may have detrimental effects to the landfills
6. We do not dispute landfill to be the final means of waste disposal. However, further review and investigation must be carried out in order to keep the scale of extension of the landfill sites to a minimum due to the following reasons:
- As mentioned in the “Invitation and Response Document” issued by the Council of Sustainable Development in July 2004, Landfills use up a lot of the valuable land in Hong Kong and incur annual costs of some HK\$1.5 billions
 - According to item 113 of the Policy Framework, HK\$8.3 billions have to be expended to extend the lives of the current landfill sites for only 5 to 15 years which is not cost effective
 - Substantial cost also have to be expended for the stabilization of landfills even after landfills are closed
 - Landfills have inevitably affected the environment of Hong Kong through the production of methane, the odour problem and the risk of pollution of the underground water
7. In the Policy Framework, the Government aims to commission the 1st phase of the IWMF in mid 2010s. However, up to now, there have been no details as to the capacities of the plant for the 1st phase, the proposed location(s), the exact mix of the capacities of the MBT and incineration etc. We are also concerned as to whether there is sufficient time to achieve this target as it takes time to carry out the environmental impact assessment, the tendering, the design and implementation of the plant. We suggest that the Government advise what would be the next step forward right after the issue of this Policy Framework.
8. Regarding selection of the location(s) of the IWMF, it is anticipated to be a contentious issue which requires Government substantial lobbying to the general public. With the most state-of-the-art “incineration” technology, the location(s) of the IWMF can be close to the residential area which greatly reduce the transportation cost of the waste. In a recent TV programme, the “Asahi Clean Center” at Kawaguchi city of Japan is introduced which is very impressive. The Center, which is surrounded by residential buildings, comprises a recycling facility and an incineration plant using gasification completed with ash-melting technology for treating the municipal solid waste, together with indoor swimming pools, health spa and sauna facilities, and an education facility for the use by the local community. The water for the swimming pools, health spa and sauna facilities is kept warm by utilizing the remaining heat of the incineration facility.

9. The construction of the EcoPark is a good starting point for promoting the recycling businesses and should be encouraged. The Government should further investigate means for supporting the reuse, recovery and recycling businesses.

10. As mentioned above, the Association supports the “polluter-pays” principle. We however do not agree with the intention of the Government to link the implementation of the IWMF with the implementation of the “polluter-pays” principle as stated in the Policy Framework. We anticipate that there will be different voices in the society on the charging for MSW and it takes time to reach consensus, not to say enacting legislation. We simply do not want to see the delay of the IWMF due to the limited lives of our landfills.