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From: Julia Brown

Date: 05/12/2014 02:11PM

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Subject: Concerned with Climate Change and Health of EPD's approach to Waste Management

Dear Member of the Public Works Sub Committee,

I am writing to you to express my deep concern regarding the proposed Incinerator for which the Environmental Protection Department needs your approval before proceeding.

My main concerns are on the impacts on Climate Change and Human Health.

There are two levels of concern. Firstly, it is estimated that for every one tonne of waste that is incinerated, one tonne of carbon dioxide is released into the atmosphere. This means three thousand tonnes of CO2 will be released every day from the giant incinerator, according to EPD estimates of waste to be incinerated. Whilst not immediately threatening to human health,

there is no doubt that this will have a negative effect on climate change. Should Hong Kong be endorsing this kind of approach when there are other less damaging options available?

My second concern is that the EPD proposal takes insufficient account of the Hong Kong AQO. Are there any statistics to prove scientifically exactly what toxins will be emitted from the Incinerator? Have the EPD compared the forecast emissions with the 2012 AQO's? If so, will they be kind enough to share the figures with us all? It is a fact that moving grate incinerators do emit toxic elements into the atmosphere. It is interesting that the Government Medical Department have not so far expressed any opinion on this matter regarding the impacts of the Incinerator releasing dioxins and particulates into the atmosphere. One wonders how many premature deaths are "acceptable" to Hong Kong as a consequence of large scale moving-grate incineration.

On 16th April 2012, the EPD produced a Discussion Paper for the Panel on Environment Affairs Sub Committee on Improving Air Quality. The purpose of the Paper was to seek "*the views of Members on the proposed new Air Quality Objectives (AQOs) and air quality improvement measures for achieving these new Objectives*". The Paper did not mention Incineration as a contributory cause of deteriorating air quality, but under the heading of Economic Implications, sections 11 and 12 discuss;

*"The delivery of the proposed new AQOs and the air quality improvement measures would help combat air pollution, thereby improving quality of life, reducing medical cost and indirectly raising labour productivity. The consultant estimates that about 4,200 unnecessary hospital admissions and 7,400 statistical life years would be saved each year (or an improved average life expectancy of around one month for the entire population) upon attainment of the proposed new AQOs[2]. Other health benefits, such as less people contracting asthma or other respiratory diseases, would also be expected. In addition, **better air quality and visibility would help attract more tourists and foreign investments, and are conducive to attracting talents to stay and work in Hong Kong.** All these would contribute to reinforcing our position as a world city and leading international business hub. The proposal would also facilitate further collaborative efforts with Guangdong in improving regional air quality and the development of environmental industry in the region.*

*The impacts of individual proposed air quality improvement measures, which have to be assessed on a case-by-case basis, would be felt differently by different sectors of the economy. In particular, the more stringent standards and requirements to comply with the proposed AQOs would incur implementation costs for various businesses and raise their operating costs. Moreover, **the proposed AQOs would raise the standards required for***

obtaining the EIA approval for infrastructural projects, which may lead to higher mitigation costs in order to comply with the standards. The consultant nevertheless advises that, for indicative purpose, the annualized cost incurred by the public for implementing the proposed Phase I air quality improvement measures would be about HK\$ 596 million. This is, however, significantly lower than the anticipated benefit of HK\$ 1,228 million per year due to the improvement of public health.”

The EIA Report for Incineration was carried out before the AQO's were revised. Does this mean that emissions from the Incinerator will not have to comply with the revised AQO's?

With the greatest of respect, I would ask that you reject the EPD proposal for incineration and insist that they carry-out proper evaluation of the waste issues and come up with a strategy that does not cause more damage to Hong Kong and her residents.

Yours sincerely,

Julia Brown

Resident of Hong Kong for over 20 years

香港立法會
工務小組委員會
主席及各位立法會議員

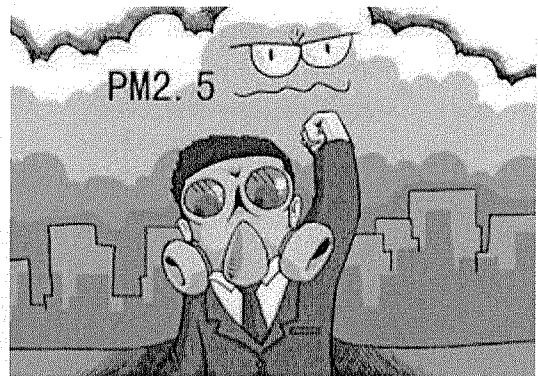
日期：2014年5月11日

有關「三堆一爐」方案

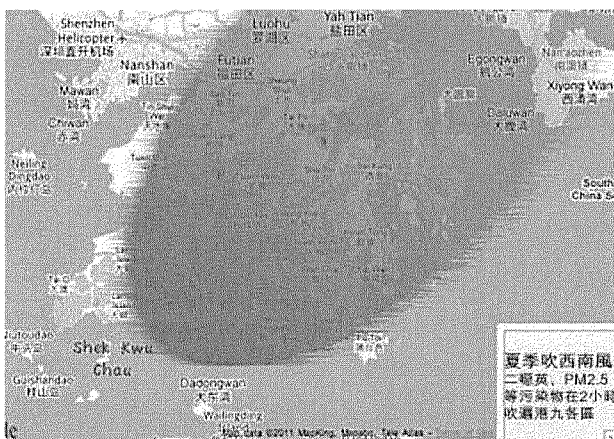
環境局聲稱處理香港垃圾問題急不容緩，然問題是「三堆一爐」的工程極之龐大；花費之多也極之驚人，反對聲音更是不絕於耳。而四個工程將直接影響及屯門、將軍澳、北區、離島各區超過 1,000,000 居民的日常生活及健康，間接也使全港市民承受沉重的社會成本；規劃顯然是極有問題。香港基建近年來頻頻延誤及超支，已是一個不能忽視的問題。各位尊貴的議員，若然仍漠視官僚們過往草率失職的紀錄，盲目支持環境局「三堆一爐」的規劃，顯有失職責。希望各議員關注以下有關焚化爐問題：

1. 累積污染損性命

環境局在硬銷焚化爐時，曾提及焚化爐很安全及會採用歐盟排放標準；焚化爐排出的有毒氣體、污染物很少，對人體的健康影響微不足道。問題是世界上所有焚化爐都會排出大量的二氧化碳及一定數量的二噁英、PM_{2.5}等污染物。而世衛最近已將「空氣中的懸浮粒子」列入最高風險的「第一類致癌物」，即該類「微細懸浮粒子(PM_{2.5})」對人體的健康可造成嚴重的損害。



環境局也沒有正視近年的研究越來越多顯示，人體健康與焚化爐排出的氣體有著密切的關係；居住在焚化爐附近的居民，會因長時間吸入太多有害氣體而生病，甚至患癌，影響嬰兒正常出生等問題。環境局雖說焚化爐很安全，但居民長期在這種受污染的環境下生活怎會不受影響？政府總不能將人體的性命及健康來做試驗？雖然離島區相對其他地區人煙較稀少，不過焚化爐影響 30,000 人的日常生活，顯然不是一個小數目。立法會各位議員，是有責任關注焚化爐對人體性命及健康的影響。

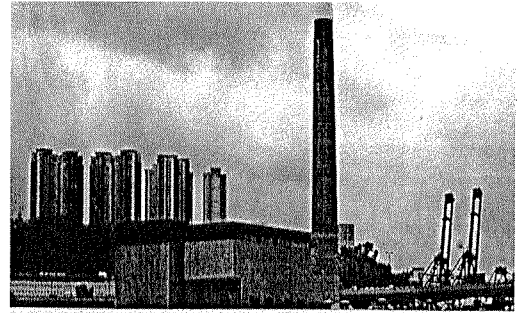


環境局亦漠視了焚化爐 24 小時運作，其排出的有毒氣體、污染物累積在周邊環境，會對生態及環境造成嚴重的污染。長洲與石鼓洲距離只有 3 公里，污染物在 10 分鐘左右便吹遍長洲，而不到數小時也吹到香港九龍。要知香港地方太小，污染物是源源不絕地 24 小時從焚化爐排出；在短時間內不被稀釋時，將導致市民的呼吸系統出現更大的毛病，甚至患上癌症。

2. 漠視空氣污染

據近年調查，香港空氣質素在全球 566 個城市中已排尾 8，市區的 PM₁₀ 已超出世衛標準十倍，而 PM_{2.5} 也超出世衛標準十多倍，空氣質素可謂惡劣。環保署在未有改善現時嚴重的空氣污染情況下，卻仍構思引用最污染空氣的焚化爐來處理垃圾；可謂甚不負責任，也失卻了政府設立環保署保護環境的意義。這將導致有害氣體、污染物，將隨著不同的氣流而在香港各區四散，相信將令香港的空氣質素進一步變得更差。

香港 1997 年關閉所有焚化爐，是因為其嚴重污染環境。現代的焚化爐雖然比過往有很大的改良，增設多重先進的空氣污染控制系統；但「活動爐排焚化技術」並非什麼新技術，有毒氣體和污染物如 PM_{2.5}、PM_{0.1} 是無法隔除，一樣會從焚化爐的煙囪排出。這些污染物對心肺功能損害極大。



The Kwai Chung Incineration plant closed in 1997 because of pollution fears. Photo: K. Y. Cheng

3. 香港資源循環藍圖

環境局在未來十年廢物藍圖中，雖說多管齊下處理垃圾；不過著重點始終在堆填區及焚化爐，即現時討論的「三堆一爐」。尤其動用 182 億元的公帑去建焚化爐，即佔整體「三堆一爐」的六成半開支；去建一個成效甚低的設施，顯然是極有問題。雖然環境局引用世界最大的荷蘭焚化爐(Afval Energie Bedrijf)，每日能處理 4400 公噸垃圾為例。但環境局顯漠視了一些客觀因素，也漠視了當地對這焚化爐評為歐洲最污染設施之一：

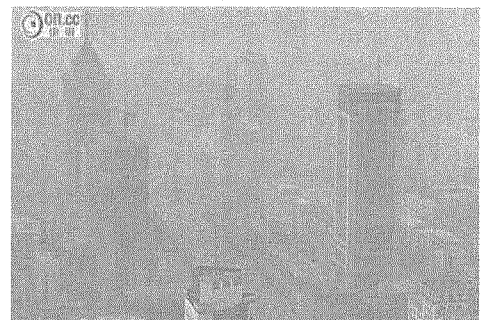
<http://www.theguardian.com/news/datablog/2011/nov/24/cost-of-environmental-pollution>，



我們發覺世界上超過 3000 公噸的焚化爐寥寥無幾，而荷蘭這個焚化爐，是建在人口稀疏的工業區，而非在人煙密集的住宅區。

現今科技一日千里，而《環境影響評估報告》以十多年前的資料來審視問題；從焚化技術層面至空氣質素要求，至今都有很大的改進。各位立法會議員，顯然有必要深入研究焚化爐所帶出的禍害及引致的社會成本。

環境局常藉口說任何城市都有焚化爐，更說香港這樣先進的城市，為何沒有焚化爐？不過請看美國紐約這樣先進的大城市，人口比香港多，但地方卻比香港少；人們至今都沒有使用焚化爐，為何香港要用十年時間去建一個焚化爐？現時世界各先進城市都努力做好分類回收，試圖建造一個綠化城市；環境局則喜歡仿效內地建造一個霧霾城市，拿市民的生命健康來開玩笑。

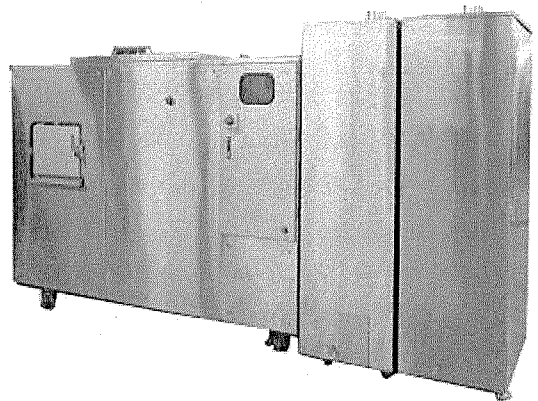


4. 無做好分類回收

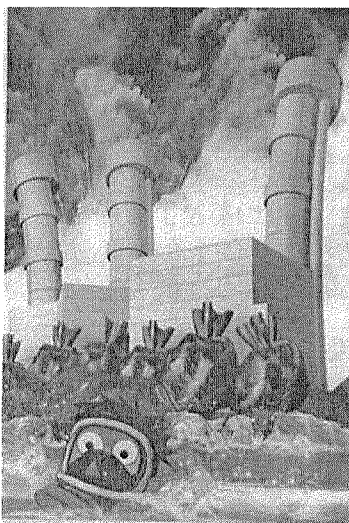
世界上任何先進國家處理垃圾，都「必先做好」分類回收工作，最後才考慮焚化。特首梁振英先生在其競選承諾時，也是先做好減廢工作；在無法再處理垃圾時，才考慮以焚化爐來解決問題，焚化爐是最後的方法。新政府上任至今已近 2 年，其間雖已開始推動源頭減廢；如宣傳「惜食香港運動」，及加設了些地區的回收箱等。問題是這類的宣傳，尤其是佔垃圾四成的廚餘，若沒有積極的政策推動，恐怕 10 年時間也難以改變居民的習慣。現政府雖成立督導委員會，負責統籌香港的垃圾；問題是我們見不到政府有決心做好分類回收工作，只依靠「三堆一爐」來處理垃圾。

環保署現構思在 18 區設環保站，加強地區減廢功效；也減少廢物長途運輸的耗費及滋擾，這種構思是值得讚賞的。不過這類工作必須由政府帶頭，同時要得到地區的充份支持；並招攬地區不同組織與政府合力一起參與減廢，才能見效。如最近有團體提出設立「剩食回收站」，把商業機構日常丟棄剩食轉送給基層市民，未尚不可物盡其用。最忌是雷聲大、兩點小，有頭無尾。或走向以往舊路，由一些與環保署有親密聯繫的組織單獨推行；從過往的經驗可見，十年來一事無成仍有目共睹的事實。

廚餘佔垃圾的四成，應是政府重點最先處理的對象。環境局雖構思開設六個廚餘處理中心，然這只適宜處理工商廚餘。現代廚餘機可把廚餘體積縮小 80% 以上，每機每日已可處理近一噸的家居廚餘；且可濾去難聞的氣味，最適宜在大廈屋苑內推行。環保署現時雖有資助屋苑回收廚餘計劃，但每日處理量不到 10 公噸；可謂流於表面宣傳多於實際減廢作用，有關政策顯有必要進一步調整。



5. 破壞環境損生態



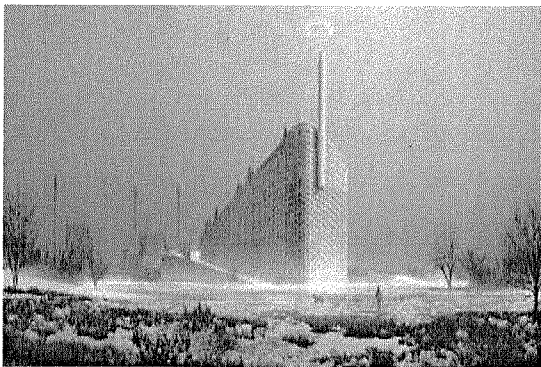
在海上建造焚化爐，無可避免地需要挖泥填海。雖然環保署說會使用最先進技術，不過從政府以往歷次經驗顯示，在實際運作時卻是兩回事；海水會受到不同程度的污染，嚴重的更長達十年之久。雖然政府會在填海工程其間，補助附近捕魚業及養魚業的損失；然漁民卻永久失去 31 公頃的捕魚區，及 16 公頃魚類產卵和育幼區，生計受損。

而且超級焚化爐排出的污染物，會累積在石鼓洲一帶，亦嚴重干擾石鼓洲島上居民的生活及健康。島上珍貴的物種如白腹海鵬、鮑士雙足蜥等，將無法繼續生存。而且焚化爐一定會排出大量的二氧化碳(CO₂)，形成酸雨影響周邊環境及水質。而石鼓洲島上有這麼多珍貴文物，及一所很重要的戒毒所，卻因環境局草率決定而蕩然無存。而當有毒污染物融入海水時，附近的海產長期吸收這些有害物質便會殘留在體內，而人類食用這海產自然是不理想，市民的生命健康難有保障。

石鼓洲附近是一個未受到任何破壞的天然環境，那裡居住了一種瀕危絕種的國家級保護動物「江豚」。這種動物活躍於石鼓洲，在那裡牠們可找到喜愛的食物，可在那裡哺養幼兒，逃避其他海洋動物的侵襲。然環境局卻用長官意志，擬粗暴地把牠們趕離慣常聚居點石鼓洲。雖然環保署構思在索罟群島附近建海岸公園以安置這類瀕危物種，問題是這類哺乳類動物並不是魚類；未必能適應新的海底環境，亦未必能逃避到其他海洋動物的侵襲。長久以來，其活動於石鼓洲範圍而非索罟群島附近，自有其眾多生存的因素；環境局這種決定，無疑滅絕其生存空間。

6. 蓄意隱瞞事實

環保署自 2011 年推出焚化爐時，便向市民吹噓現代焚化爐如何先進，甚至採用較歐盟排放標準更嚴格的標準。而在「環評報告：健康影響」中指出：「污染物對健康產生的影響非常小且無法被量化」、「…和爐灰所造成的潛在健康影響並不顯著」。但環保署在 2013 年 12 月 13 日在解答居民查詢時，卻一反過往論據；強調焚化爐是一種污染源，不能再建在屯門增加區內的污染。這種自相矛盾的理論，顯示環境局的誠信很有問題。



環境局雖然引用一些外國的焚化爐例子來解說安全，不過往往斷章取義，對於別人的處理方法及程序，客觀因素則完全忽視。尤其外國的焚化爐，多是細小的(1000 公噸左右或以下)，且當地多做好分類回收工作才焚化垃圾。我們的環境局則構思一個神話式的焚化爐，無需分類便可焚燒；居民深信這樣焚燒垃圾，將排出大量極度危險的污染物，危害生命健康。

環境局曾說現時香港青衣也有個焚化爐，居民當初反對，不過現時已接受了；但環境局擬用的焚化爐不但是世界最大之一，且集中焚燒全港無分類的垃圾，其處理量更是青衣日常處理量的千倍，明顯蓄意誤導公眾。現時世界上很多研究都同樣指出，焚化爐產生的飛灰及爐灰，都有不同程度的劇毒。但環保署於 2012 年 1 月 17 日，出席城規會主辦的公眾諮詢會時，公然聲稱焚化爐產生的爐底灰沒有毒，從而獲得城規會在當晚通過在石鼓洲建焚化爐決議。這種公然誤導公眾的言行，顯然有違環保署保護環境的責任。

7. 誇大數據誤導公眾

政府將環保業定為六大發展行業，但以往環保署並沒有積極扶持；紙料及金屬等有價廢物回收，都是各區小市民努力收拾的成果，但環保署卻盜用來作自己的政績。而低價值的廚餘、玻璃樽、廢膠等，卻沒有任何政策配合。推行了十多年的三色筒，市民履行了分類回收責任；而環保署卻容許有關部門或業界隨意傾倒於堆填區內，減廢可謂全功盡廢。



以往環保署經常誇耀自己的高回收率，對外公佈的回收數字、堆填區的處理量等也是水份十足。而將回收比率任意調高降低，這種弄虛作假的風氣，無怪乎十年來減廢一事無成；香港的環境將繼續惡劣，空氣污染亦無法根治。環境局以往失信於民在先，現時在未有任任何減廢成果前，卻在「香港資源循環藍圖」把焚化爐作為一種主要減廢方法，近日更急於向立法會申請撥款建焚化爐。難怪令人質疑環境局的減廢決心。



而引用 1987 年較落後的空氣質素標準，來審批環評報告及批出的環境許可證，顯然也是一種卑劣的手法；因為在這標準下，很多有毒氣體及污染物不被編入計算或公布之列，當中最重要之污染物 PM_{2.5} 完全被忽視。居民很當心環保署蓄意淡化損害數據，令身體吸收大量有害物質，嚴重損害健康。而當居民身患頑疾時，則求助無門。

8. 浪費公帑失職責

過往環境局構思在陸上建「超級」焚化爐的成本不外 40 億元，已是全世界最昂貴的價錢；而建築時間不外 3 年，便可全面運作。然環境局現在卻偏選擇用多兩倍的時間，多數倍的公帑在海上建「超級」焚化爐；這種海上工程現時雖預算約 180 億元，不過工程完成後慣常超支一二倍。而焚化爐每年經常開支 4 億多元，加上每年通脹、維修保養、風險管理等，可謂是個無底深淵。



本來用一個月的時間來公眾諮詢一個近 200 百億的計劃，已經是少得非常可憐。而最令人震驚的是環保署在這極短的一個月公眾諮詢時，顧問公司(AECOM)已經在自己的網頁，誇耀自己取到全球最大合約之一。相信將來所有的維修保養及運作建造工程，很自然是這集團所承辦。公眾很不明白，為何環保署批出的工程，慣常由一些親政府的財團建造，而造價往往高出國際市場數倍之多。這種若不是「官商勾結」，恐怕難以解釋有如此決定。

環保署擬將全港所有的垃圾運到石鼓洲來處理，然當中扣除一成不宜焚燒物及二成爐底灰外，實際只能處理 2100 公噸垃圾；即長途跋涉地把 3000 公噸垃圾運至石鼓洲，然後卻將約 900 公噸不能處理的廢物運回屯門堆填。處理垃圾的效能可謂甚底，而製造出來的傷害卻是奇高。而這種涉及大量運輸的方法，不但耗費大量能源，而且沿途所產生的污染及滋擾，也是難以估計。加上石鼓洲焚化爐只能經水路運輸，每逢霧季及風季，運輸風險劇增，我們不見環保署有套完善的危機處理方案。萬一途中發生意外，對環境的損害將是災難性的。公眾難以明白環保署為何會有這種不智決定。

9. 倒行逆施損法治

《環境影響評估報告》所提及的 23 個焚化廠選址，當中分析自相矛盾。環保署原本選擇在屯門曾咀及石鼓洲興建兩個焚化爐，但礙於屯門聲音大而離島聲音小；環境局在「香港資源循環藍圖」中，靜靜地取消了屯門曾咀的焚化爐，只選擇在石鼓洲興建。但在顧問報告有關兩個選址的十多項比較中，無論在危害生命之程度、跟現有廢物處理設施配合、工程風險、營運風險、用地、生態影響等，石鼓洲都是較不宜的；環境局公佈一個較適宜的交通因素，也是令人啼笑皆非。我們很驚訝環保署官員，用這種非理性的處事態度來辦事。

從過往環保署官員每次落區諮詢居民的結果反映，離島居民是強烈反對在石鼓洲建焚化爐。在 2013 年 12 月 16 日離島區議會有關石鼓洲焚化爐的討論，絕大部份區議員都反對環境局在未有任何減廢的成績前急於興建焚化爐；以下短片是當日各區議員的意見：

<http://www.youtube.com/watch?v=iL5TOzbyEkE&feature=youtu.be>

在 2014 年 3 月 22 日的立法會環境事務委員會特別會議中，近七成發言是受影響地區的居民，他們以淚水說出各個不同的經歷及感受，希望有關當局及各立法會議員體察民情。很可惜大部份環委會議員漠視了民意。

過往環保署每次到離島諮詢時，居民都是強烈反對在石鼓洲建焚化爐；然環保署在眾多報告上，則說諮詢了很多意見。並蓄意歪曲事實，把反對寫成同意、需要等誤導性文字；顯然這不是一個負責任政府應有的做法？近觀鄰近地區政府強推焚化爐，把居民推上絕路，難怪乎抗爭暴動時有所聞：

Reuters: <http://www.reuters.com/article/2014/05/10/us-china-protests-idUSBREA4904320140510>

BBC:

http://www.bbc.co.uk/zhongwen/trad/china/2014/05/140511_china_hangzhou_environment_protest.shtml

從過往民意反映，居民都是極擔心超級焚化爐帶來的損害。希望立法會各議員以民意為依歸，也以香港市民的健康及利益為依歸；勿急於通過興建焚化爐，把居民推上絕路，損害香港的核心價值。謝謝關注。

許輝程謹啓

群峰學會

長洲中興新街 20 號地下

Cc: 香港特別行政區首長、政務司司長、中聯辦主任、行政會議、環境局局長、民政事務局局長、民政事務總署署長、離島民政事務專員、離島區議會主席周玉堂及區議員、長洲鄉事委員會主席翁志明立法會秘書處、立法會議員、無視電視、亞洲電視、商台、東方、蘋果、星島、明報、島嶼活力行動、新界關注大聯盟、綠色和平、綠色力量、地球之友、長春社

To: "wklo@engineer.com" <wklo@engineer.com>, "lcc.ntw@dab.org.hk" <lcc.ntw@dab.org.hk>, "jkstolegco@gmail.com" <jkstolegco@gmail.com>, "klclegco@gmail.com" <klclegco@gmail.com>, "elau@dphk.org" <elau@dphk.org>, "yctam@dab.org.hk" <yctam@dab.org.hk>, "arazack@netvigator.com" <arazack@netvigator.com>, "khwong@ftulegco.org.hk" <khwong@ftulegco.org.hk>, "info@cydho.org.hk" <info@cydho.org.hk>, "garychk@dab.org.hk" <garychk@dab.org.hk>, "leungkl@leungkl.org" <leungkl@leungkl.org>, "ipkh@dab.org.hk" <ipkh@dab.org.hk>, "contact@alanleong.net" <contact@alanleong.net>, "albert.wychan@yahoo.com.hk" <albert.wychan@yahoo.com.hk>, "legco@michaeltien.hk" <legco@michaeltien.hk>, "tpc@jamestien.com" <tpc@jamestien.com>, "frankieyick@liberal.org.hk" <frankieyick@liberal.org.hk>, "chiwaioffice@gmail.com" <chiwaioffice@gmail.com>, "fankwokwaioffice@gmail.com" <fankwokwaioffice@gmail.com>, "fkmaoffice@gmail.com" <fkmaoffice@gmail.com>, "charlesmok@charlesmok.hk" <charlesmok@charlesmok.hk>, "benchanlegco@gmail.com" <benchanlegco@gmail.com>, "info@chankalok.hk" <info@chankalok.hk>, "yhchan@ftulegco.org.hk" <yhchan@ftulegco.org.hk>, "amlegco@gmail.com" <amlegco@gmail.com>, "info@cheungchiuhung.org.hk" <info@cheungchiuhung.org.hk>, "helenawonghk@gmail.com" <helenawonghk@gmail.com>, "eq@eqweb.hk" <eq@eqweb.hk>, "chianglaiwan@gmail.com" <chianglaiwan@gmail.com>, "office@chungsk.com" <office@chungsk.com>, "info@tonytsewaichuen.com" <info@tonytsewaichuen.com>
From: Steve Quilkey
Date: 05/12/2014 08:14PM
Cc: Living Islands <info@livingislands.org.hk>, "cb1@legco.gov.hk" <cb1@legco.gov.hk>
Subject: Very concerned with EPD's approach to Waste Management

Dear Member of the Public Works Sub Committee

Proposed Incinerator for Hong Kong

I am extremely concerned about the environmental impacts of the proposed Incinerator that the EPD plan to site on reclaimed land adjacent to Shek Kwu Chau.

The original selection process and criteria for the Shek Kwu Chau site were seriously flawed – there was false and misleading information about wind direction and environmental impacts, inadequate attention to the detailed transportation costings, and insufficient consideration given to the need for transporting 1,000 tonnes per day of toxic ash from the remote Island location to existing landfill sites. The best reason the EPD gave for selecting SKC is that it achieves a “balanced spatial distribution” of waste processing sites. This “beggar-my-neighbour approach” is surely not the way Asia’s World City should be conducting its Government?

Why hasn’t the Environment Bureau reconsidered options /alternatives to their only proposal? There are valid and credible alternative proposals for multiple smaller locations around the SAR, that would,

- be closer to sources of waste and existing landfill sites,
- represent a much lower risk of failure,
- be available to be brought on-line sooner,
- be smaller scale and therefore more cost effective,
- provide more integrated facilities for sorting and recycling waste,
- provide more employment opportunities, and
- could represent lower capital costs and lower overall operating costs.

The EPD proposal deserves to be rejected, for the good of Hong Kong. The people of Hong Kong expect you to make the right decisions so that the future of the SAR is not blighted by this infamous and single minded proposal.

I have also written in the past expressing what a terrible waste of tax payers money this project would be. Although Hong Kong has a huge budget surplus it most certainly should not be wasted on a project that will produce toxics to poison the very people that are paying for it. Especially when so many better alternates exist.

Yours sincerely

Steve Quilkey

HKID;

To: "wklo@engineer.com" <wklo@engineer.com>, "lcc.ntw@dab.org.hk" <lcc.ntw@dab.org.hk>, "jkstolegco@gmail.com" <jkstolegco@gmail.com>, "klclegco@gmail.com" <klclegco@gmail.com>, "elau@dphk.org" <elau@dphk.org>, "yctam@dab.org.hk" <yctam@dab.org.hk>, "arazack@netvigator.com" <arazack@netvigator.com>, "khwong@ftulegco.org.hk" <khwong@ftulegco.org.hk>, "info@cydho.org.hk" <info@cydho.org.hk>, "garychk@dab.org.hk" <garychk@dab.org.hk>, "leungkl@leungkl.org" <leungkl@leungkl.org>, "ipkh@dab.org.hk" <ipkh@dab.org.hk>, "contact@alanleong.net" <contact@alanleong.net>, "albert.wychan@yahoo.com.hk" <albert.wychan@yahoo.com.hk>, "legco@michaeltien.hk" <legco@michaeltien.hk>, "tpc@jamestien.com" <tpc@jamestien.com>, "frankieyick@liberal.org.hk" <frankieyick@liberal.org.hk>, "chiwaioffice@gmail.com" <chiwaioffice@gmail.com>, FAN Kwok-wai Gary <fankwokwaioffice@gmail.com>, "fkmaoffice@gmail.com" <fkmaoffice@gmail.com>, "charlesmok@charlesmok.hk" <charlesmok@charlesmok.hk>, "benchanlegco@gmail.com" <benchanlegco@gmail.com>, "info@chankalok.hk" <info@chankalok.hk>, "yhchan@ftulegco.org.hk" <yhchan@ftulegco.org.hk>, "amlegco@gmail.com" <amlegco@gmail.com>, "info@cheungchiuhung.org.hk" <info@cheungchiuhung.org.hk>, "helenawonghk@gmail.com" <helenawonghk@gmail.com>, Elizabeth Quat <eq@eqweb.hk>, "chianglaiwan@gmail.com" <chianglaiwan@gmail.com>, "office@chungsk.com" <office@chungsk.com>, "info@tonytsewaichuen.com" <info@tonytsewaichuen.com>, "cb1@legco.gov.hk" <cb1@legco.gov.hk>

From: Paul Melsom

Date: 05/13/2014 07:42AM

Subject: RE: Finless Porpoise off Shek Kwu Chau

Please do not let the Finless Porpoise become locally extinct

due to the Integrated waste management facility

Finless Porpoises habitat -Shek Kwu Chau

13 May 2014

I appeal to the Legislators to investigate the impact that the reclamation works and the long term effects of the Integrated waste management facility (IWMF) will have on the **Finless porpoise population whose habitat lies off Shek Kwu Chau and South Lantau.**

Only two weeks ago I went on a research boat trip to south Lantau and Shek Kwu Chau and we saw an estimated 40 Finless porpoises in the waters around the Soko Islands and in the waters off Shek Kwu Chau which is the exact same location designated for the reclamation for the IWMF (otherwise known as the incinerator).

It was wonderful to see these mammals who are very important as top predators to help maintain a healthy marine habitat.

Finless porpoises are designated as a rare species with a status as vulnerable on IUCN red list and in Hong Kong an important part of their habitat is recognised and known as that being in same location as the proposed reclamation for the IWMF next to Shek Kwu Chau.

It appears the relevant Government Departments of the Agricultural, Fisheries and Conservation Department (AFCD) and the Environmental Protection Department (EPD) have conveniently and adequately failed to notify the legislators that if the reclamation along with the IWMF (incinerator) goes ahead then this will bring about catastrophic consequences for these mammals and could lead to their local extinction. We have already seen the consequences of what has happened to the Pink Dolphin population and it is already evident that there is a rapid decline in their reported sightings due to the construction of the Hong Kong –Zhuhai- Macau Bridge.

I appeal to the Legislators to investigate the impact that the reclamation works along with the long term effects of the incinerator will have on the **Finless porpoise population whose habitat lies off South Lantau particularly off Shek Kwu Chau.**

For information on the Hong Kong **Finless Porpoise** please refer to the booklet on the **Finless Porpoise** that were distributed during the Public

presentation meeting.

Why should such a wonderful animal that has been living on this planet for millions of years and which presently lives in the pristine quiet waters off Shek Kwu Chau be put at such risk of extinction in just a few years due to Government incompetence and laziness.

Thank you for reading this,

Paul Melsom Eco-educator and Conservationist

From: Peter Reid <
To: f_pwsc@legco.gov.hk

Date: Tuesday, May 13, 2014 04:06PM

Subject: Fwd: Nonsensical, Irrational, Irresponsible, Unconscionable and Fraudulent Waste Plans for the Mega Incinerator and Landfill Extensions

Dear Sir/Madam,

The email already sent to all Members of the PWSC is forwarded to you for your records.

Forwarded to You for inclusion in the official record of submissions to the PWSC. All content may be exhibited for the public access with restriction.

Yours Sincerely

Peter Reid
 Chairman and Director

Zero Waste Smart City Resources Association Ltd.

----- Forwarded message -----

From: Peter Reid

Date: 13 May 2014 16:01

Subject: Re: Nonsensical, Irrational, Irresponsible, Unconscionable and Fraudulent Waste Plans for the Mega Incinerator and Landfill Extensions

To: wklo@engineer.com, lcc.ntw@dab.org.hk, jkstolegco@gmail.com, CHAN KAM LAM <klclegco@gmail.com>, elau@dphk.org, yctam@dab.org.hk, arazack@netvigator.com, khwong@ftulegco.org.hk, Cyd HO <info@cydho.org.hk>, garychk@dab.org.hk, leungkl@leungkl.org, ipkh@dab.org.hk, contact@alanleong.net, albert.wychan@yahoo.com.hk, legco@michaeltien.hk, tpc@jamestien.com, frankieyick@liberal.org.hk, Chiwai Wu <chiwaioffice@gmail.com>, 范國威議員辦事處 <fankwokwaioffice@gmail.com>, FK Ma <fkmaoffice@gmail.com>, charlesmok@charlesmok.hk, Ben Chan <benchanlegco@gmail.com>, info@chankalok.hk, yhchan@ftulegco.org.hk, Alice MAK <amlegco@gmail.com>, info@cheungchiuhung.org.hk, Helena Wong <helenawonghk@gmail.com>, eg@eqweb.hk, Lai Wan Chiang <chianglaiwan@gmail.com>, office@chungsk.com, info@tonytsewaichuen.com

Dear Sir/Madam,

Waste Misrepresentation and Fraud - The Criminal Waste Policies of Hong Kong - The Waste' Pork Barrels' and 'Gravy Trains'

from Public Funds

Whatever political persuasion you may be, including the most die hard contra-common sense supporters of the nonsensical, unsustainable, environment, health and life threatening Government Waste Plans, this issue is too important to be voted on because of some pre-arranged back room deal. From feedback at recent waste and eco conferences Hong Kong is being leapfrogged and fast left behind by China in its approach to the environment and waste.

1. The First Test for any Sustainable Waste Policy is: Does 'Separation at Source' Exist ?

This policy is easy to implement with proper education and training on convenient, easy to use, simple bar coded biodegradable bag separation. Widely used by 45 million people in Italy alone. This separation at source combined with **positive affirmative waste charging i.e. no charge if waste is properly separated only if it is not separated in the right manner.** The adoption hurdle is easily and enthusiastically overcome in practice. The people are engaged and know that they are contributing directly to a Green, Clean, Healthy and Sustainable Environment. This applies too all households, students, workers and businesses.

Separation at Source becomes an App: Simple Separation at Source with Bar Coded Measurement and Tracking makes such separation a simple App on everyone's mobile phone. Your waste separation performance is easy to monitor and check.

2. Proper Separation at Source makes immediately makes these categories of waste a Viable, Cash Generating Commercial Business :

(i) Food and Green Waste (40 to 45% of HK Waste) - Easy to recycle at low cost using Italian or Taiwanese Methods and Natural Technologies - Carbon to Earth ... Not Air - Sustainable and Viable Fish & Vegetable High Tech Japanese, Okinawan and Taiwan Farms and Business in Each District.

(ii) Recyclables like glass, metals, plastics and paper (20 to 25 % of

HK Waste) - Viable Recycling Business in each District.

3, Waste is Local - Solution is Local - Reduce Waste Collection Pollution to Zero by use of E-Vans - Think Green, Go Clean and Live Cool in Hong Kong

Summary: Separation at Source for Households, Institutions and Businesses is easy to implement and requires a low capital and operating expenditure to put in place and make sustainable. It would also remove 60 to 70% of HK Waste.

The Government has not put any meaningful Separation at Source in Place. The Effective Public Recycling Rate is Effectively Zero.

The present policy is simply: Black Plastic Bag, Compress and Landfill - This makes for an easy job for Veolia and Indo (Sita), the French HK Waste Duopoly.

4. This line of questioning and reasoning leads inevitably and inexorably to the next question:

Why is not separation at source policies or plans in place as a priority measure to deal with Hong Kong so-called Waste Problem ? Why is it not included in mentioned in so-called waste charging plans ?

The answers are not difficult to find and are unambiguous, damning and incriminating .

5. The two reasons that no Separation at Source exists are easy to identify: 'Pork Barrel' Capital Expenditure (Capex) and 'Gravy Train' Recurrent Annual Operating Pay-Offs Being Made Directly to Waste Related Vested Pecuniary Interests:

(i) Pork Barrel Capex- Separation at source would immediately remove the need and justification for the ultra expensive Capital Expenditure (Capex) and **Gravy Train Opex** - Recurrent Annual Operating Expenditure (Opex) on (a) The Mega Incinerator and all (b) Landfill Extensions i.e. Capex around t HK\$45 Billion (US\$5.8 Billion) at Current Prices and Anual Opex estimated at HK\$2.25 Billion

(US\$288 Million) . All these costs are 'unbounded' minimum estimates will be subject to massive upward revision.

(ii) Existing Waste Contracts - What are the Costs of the existing Contract Capex and Opex Payments being made to the Park N' Shop and Welcome equivalent 'French Duopoly of Waste' Veolia Environmental and Indo Environmental (Sita), with their subsidiaries and joint-ventures? What is the cost of terminating such 'Black Bag' Landfill Contracts ?

7. The first rule in any investigation of 'Cosy Relationships' is 'Follow the the Money'. In this case the '**money trail**' involved could easily top HK\$300 Billion (US\$38.5 Billion), with all the Infrastructure Capex, Opex and Contract Payments past, present and future.

8. In France Veolia Environmental has the Central Slogan - 'Faire du Dechet une Ressource' - Turning Waste into a Resource .- **But in Hong Kong Veolia and Indo (Sita) do absolutely no meaningful waste separation and recycling to turn waste into a resource.** <https://www.youtube.com/watch?v=zbrHLeQSjCI> . Makes Veolia in Hong Kong a bad joke.

Veolia and Indo (Sita) boast of Valorisation - Literally **Value Creation from Waste being around the 70% level in France - But in Hong Kong it is Zero.**

9. Direct and Only Conclusion: Separation at Source and Recycling would make both the Mega Incinerator and Landfill Extensions Unnecessary and Irrelevant. They would remove the mega monies from the 'feeding trough' of the existing vested waste interests Veolia, Indo (Sita) and the upcoming Cheung Kong Infrastructure.

10. Corruption- In this situation and that of Hong Kong, there is the utmost presumption of corruption and underhand dealing in the Government's irrational waste proposals. The Directors of the former joint-venture company Swire Sita Ltd are all serving sentences from 3 years and 6 months to 6 years for offering a bribe of US\$4 million in the form of a consultancy to secure the Macau Municipal Waste Contract.

The former Chief Secretary is currently on trial for allegations that among other things he accepted bribes and advantages again amounting to US\$4 million from the Principals and Agents of Hong Kong's largest property company.

In the light of these revelations, the primary suspects of officers, officials, companies and politicians involved in underhand activities to promote an irrational and unreasonable waste policy are blindingly obvious.

11. This is reinforced by basic flaws in the justification reasoning for the Tuen Mun Sewage Sludge Incinerator and the Organic Waste Treatment Plants 1 and 2. There is a fundamental flaw in the tendering procedure with basic conflict of interests being identified between AECOM, Leighton and Veolia. According to a retired Senior Engineer for a major HK Public Company, these Tender Documents and Specifications could only have been created in conjunction with a particular Tenderer i.e. it had been fixed and rigged in advance !

12.. Everything in the Government Waste Management Policy and Plans is a fake, rigged, sham and charade, a con - A lie to the world to defraud the people of Hong Kong.

13. This is reinforced by the further material facts that

A Cost-Effective Construction and Demolition Waste Scheme producing as an end product coarse aggregates, which would certify all developers and contractors with recycling licenses to operate , similar to the existing Singapore scheme, **would recycle 99 % of Construction Waste, another 23% of Hong Kong Waste Taken to Landfill.** Why has this course of action not being taken?

The vociferous Mr Elvis Au of the EPD stated in a public meeting that construction waste was currently being recycled at the 85% level. The main construction waste recyclers in Hong Kong, laughed at this figure and said it was more like 25 % if that ! The Deputy Director of Environment for Singapore said that she had never ever seen earth being dumped in landfill as in Hong Kong.

14. The reasons there is no similar comprehensive construction waste scheme in Hong Kong is the same as those

already quoted. It does not exist because it threatens existing waste vested pecuniary interests.

15. Recycling Schemes for : (i) Organic Food and Green Waste (The main constituent of MSW in HK !) (ii) Recyclables like Paper, metals, plastic and glass and (iii) Construction Waste means that around 90 % of waste currently taken to landfill would be recycled as local viable commercial businesses !

16. It would however put the existing players out of a job. The subverted specification process to essential to keep the current Payola Pork Barrels and Gravy Trains Scams Running.

17. The remaining 10 to 12 % of Hong Kong Waste is Hazardous, Toxic and Non-Recyclables Waste. This is best dealt with by Carbon to Ground Closed Cycle Non-Incineration, Non Combustion Plasma Plants to be located on the now redundant landfill sites. These have now reached a mature stage of development with major companies like Air Products and China Everbright Environmental. This is proved by the major re-insurers issuing project insurance for such technologies. This is the only official test of a so called 'mature' technology. These closed cycle plasma plants would produce energy and glass aggregates making them sustainable

18. It is noted that a Zero Waste Hong Kong Scheme 2020 Starting in 2015 could be completed in Hong Kong by 2019 for 100% recycling of HK Waste i.e. well before the time when an Incinerator would be built, at less than 40% of the cost of long run Government Plans to deal with 65% of HK Waste . Zero While creating 10,000 good Bioeconomy recycling jobs.

19 . A Zero Waste 100% Recycling Plan would put all Fossil Carbon to Earth in contrast to the Government's plans that irresponsible and unconscionably put all Carbon to Air. The Government not only wants to pollute the air and the environment threatening health with dangerous chemical emittances, but instead actually wants to create a

global warming, climate change problem with Hong Kong's waste. An appalling position.

20 . The Secretary for the Environment K.S. Wong and his Deputy Christine Low have both made repeated false statements of fact, by saying that there is no alternative to the Government's waste plan. This is an overt falsehood. The Secretary and his deputy are dissemblers i.e. systemic liars. It should be noted that making false statements of material fact and the corollary keeping quiet on material facts necessary in the circumstances, that statements are not misleading, are part of the official definition of illegal and unlawful fraud in the USA. The repeated false statements of fact by the Secretary, his Deputy and Mr Elvis Au are blatant false statements of material fact constituting misconduct in public office and conspiracy to commit misconduct in public office.

Do not be tempted to back the Government's corrupt waste proposals for the Mega Incinerator and Landfill Extensions .- They are a poisoned chalice of lies and corruption that will destroy Hong Kong's Environment and Hong Kong peoples' Health, as well as its Credibility and Reputation.

Protect Hong Kong Future and Children VOTE AGAINST THE GOVERNMENT'S APPALLINGLY BAD PROPOSALS

The Judicial Review Application for Leave Arguments and Applications are already prepared .. This is Pandora Hong Kong with the Bad Guys Winning. Everything will be brought into the public domain.

Yours Sincerely

**Peter Reid,
Chairman and Director**

Hong Kong Zero Waste Smart City Resources Association Ltd.

From: "James Middleton"
To: <panel_ea@legco.gov.hk>, <f_pwsc@legco.gov.hk>
Cc: "Clear TheAir" <ctawebupdates@gmail.com>, <info@cydho.org.hk>, <garyfantko@gmail.com>, <albert.wychan@yahoo.com.hk>, <elau@dphk.org>, "Dennis Kwok" <dennis.whkwok@gmail.com>

Date: Wednesday, May 14, 2014 06:29AM
Subject: Emailing: Firms take dim view of energy costs pushed up by climate change poll

>

Dear Hon Members,

So we all want to ditch coal powered generation but our forward thinking Government then wants to replace the CO2 from current coal generation with more CO2 from incineration

What kind of target is that ?

Kind regards,

James Middleton

Chairman

www.cleartheair.org.hk



dynamco May 14th 2014 6:11am

Ex Civic Exchange Kilburn

"This would include introducing new technology, altering their business practices, reducing energy consumption & setting energy or carbon targets."
Maybe Govt should listen & move to the new plasma gas technology

Ex Civic Exchange Loh

"Undersecretary for the environment C Loh said the city was on track to meet its carbon reduction targets of 50 - 60 % set for 2020, regardless of the option adopted"

She omitted that in 2023, 3 years later, when their proposed incinerator behemoth would appear, it would add 3 million kgs of CO2 into the atmosphere per day, destroying any CO2 target

www.ipcc-nggip.iges.or.jp/public/gp/bgp/5_3_Waste_Incineration.pdf

"The incineration of MSW involves the generation of climate-relevant emissions. These are mainly emissions of CO2, but also of N2, O, NOx, NH3, & organic C measured as total carbon. In waste incineration plants, CO2 constitutes the CHIEF CLIMATE-RELEVANT EMISSION & is considerably higher, by not less than 10 squared, than the other climate-relevant emissions. In Germany the incineration of 1 Mg of municipal waste in MSW incinerators is associated with the production/release of about 0.7 to 1.2 Mg of carbon dioxide (CO2 output)"

Air Pollutants From Biomass Burning Exceeds Coal

"It found sources burning biomass emit 50% more carbon dioxide per megawatt of electricity generated than coal-burning sources"

www.pfpi.net/wp-content/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf

Download the latest IPCC report

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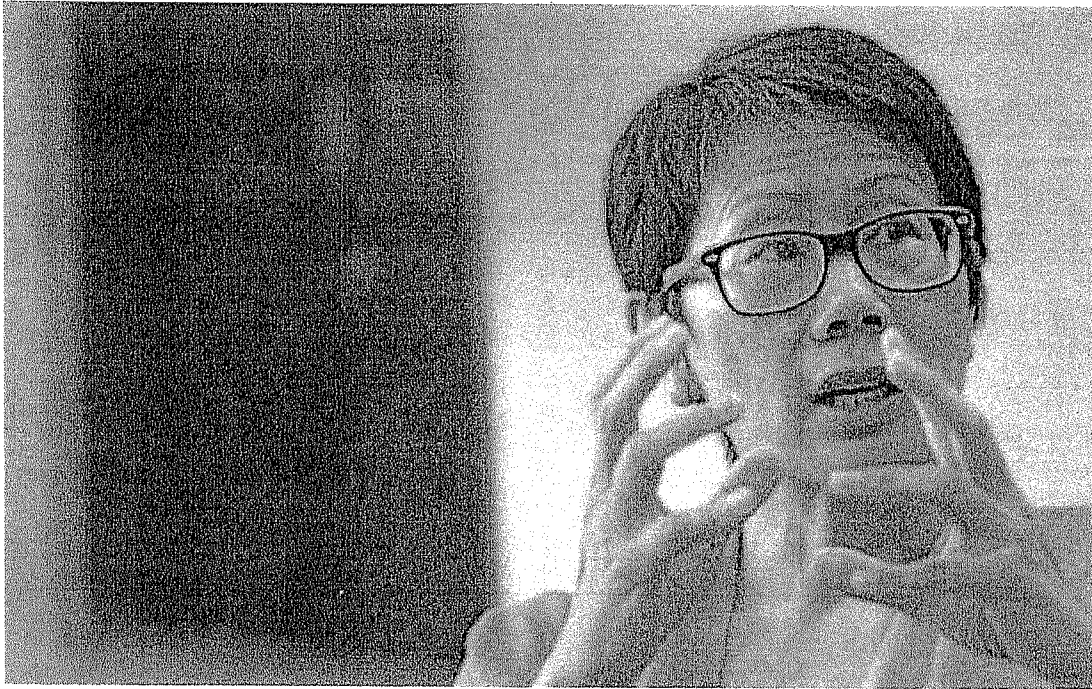
South China Morning Post 南華早報

Firms take dim view of energy costs pushed up by climate change: poll

Wednesday, 14 May, 2014, 4:00am

News > Hong Kong

ENVIRONMENT



Undersecretary for the environment Christine Loh Kung-wai said the city was on track to meet its carbon reduction targets of 50 to 60 per cent set for 2020, regardless of the option adopted. Photo: Jonathan Wong

Ernest Kao ernest.kao@scmp.com

The resulting higher cost of energy worries firms, though many are willing to pay to ditch coal

A growing number of companies see the rising power costs and scarce environmental resources associated with climate change as their biggest concerns, a business survey shows.

But three-quarters of the 300 firms polled say they are willing to pay more if it means coal is replaced with cleaner fuel sources.

The findings reflected a trend of greater corporate responsibility and a recognition that tackling climate change could reduce the chances of tighter environmental rules, said Mike Kilburn, a committee member of the Climate Change Business Forum Advisory Group under the Business Environment Council, which commissioned the poll.

"About 90 per cent of the companies surveyed say they are acting on climate change," he said. "This would include introducing new technology, altering their business practices, reducing energy consumption and setting energy or carbon targets."

He said the Hong Kong stock exchange's push for environmental, social and governance reporting requirements played an important role in the drive.

In the council's fourth annual poll, held in August and September, 92 per cent of the companies voiced concern about rising fuel and electricity costs as a result of climate change, up from 79 per cent last year.

Concerns over the scarcity of clean air, water and other resources also rose, from 78 per cent to 92 per cent. Safety fears meant only 41 per cent backed a higher share of nuclear power in the city's mix of fuel sources.

The government is consulting the public over two ideas on formulating the future energy mix.

One option entails importing 30 per cent of electricity needs from the mainland grid, while the other stresses raising domestic use of natural gas to 60 per cent.

Undersecretary for the environment Christine Loh Kung-wai said the city was on track to meet its carbon reduction targets of 50 to 60 per cent set for 2020, regardless of the option adopted.

She urged people to consider energy policy objectives - safety, cost, reliability and environmental performance - and how each option would affect the market post-2018, when a pact with the city's two power suppliers ends. **Environment officials have said both options will be more expensive**, without elaborating.

In the absence of cost estimates, many firms could not use the criterion of affordability to choose between the two, the council's policy and research director Hendrik Rosenthal said.

The poll reflected business concerns about the scant details from the government. "[Companies] cite lack of information and public disgust [with] government as major obstacles to creating public buy-in for changing the fuel mix," the survey read.

Source URL (retrieved on *May 14th 2014, 6:11am*): <http://www.scmp.com/news/hong-kong/article/1511482/firms-take-dim-view-energy-costs-pushed-climate-change-poll>

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From: "Gregory Wildes"
Date: 05/17/2014 11:38AM
Cc: <info@livingislands.org.hk>, <cb1@legco.gov.hk>
Subject: Very concerned with EPD's approach to Effective Waste Management

Dear Member of the Public Works Sub Committee

EPD Proposed Incinerator for Shek Kwu Chau

I write to express my concern for Hong Kong regarding the lack of effective strategies for managing waste in the SAR. It is indeed sad and disappointing that the Environment Bureau has not come up with a holistic approach to the SAR's waste problems, preferring instead the easy option of "just burn it all – problem solved!"

The Environment Bureau proposal for dealing with Hong Kong's waste problem does **not** represent an integrated process for our waste – despite the IWMF name they have given it. They are taking the easy and most expensive option which will involve minimal waste sorting and mass incineration of unsorted waste. There will be no incentive to reduce waste or sort waste if it is all going to be dumped in the furnace for

disposal, regardless of the damage this does to the environment, air quality and human health.

Other countries, notably Taiwan, Japan and South Korea, have implemented effective processes for waste reduction at source, have applied waste charging where appropriate, encouraged practices for sorting of recyclables, are dealing effectively with recovered recyclables, and only as a last resort do they finally dispose of residual waste by landfill or thermal treatment? Hong Kong is lagging way behind these and other Asian countries in effectively dealing with its recyclable waste – and it appears that years of inactivity by the Environment Bureau are to blame. We are in the situation we are in because of a failure to act responsibly to manage waste. Why is it so difficult for the EPD? Building a huge incinerator will only benefit the construction industry and the operator of the plant. The people of Hong Kong will not benefit from this.

Why is it so difficult to implement effective waste sorting at high-rise housing estates? Are certain departments obstructing waste management solutions because it is “too hard” for them to do anything about it? Waste can be smelly and unpleasant, but dealing with waste at source and applying effective sorting and recovery of recyclables is the right thing to do, and it can be done.

I urge you to reject the EPD proposals for Incineration. Hong Kong deserves better than this.

Yours sincerely

Gregory Wildes