



20th February 2014

Dear Members of Panel on Environmental Affairs

Hong Kong Environmental Infrastructure Projects

There are many concerns arising from the “Blueprint for Sustainable Use of Resources 2013-2022” published by the Environment Bureau in May 2013, and we, the Living Islands Movement (LIM), wish to bring these to your attention. In your meeting on Monday 24th February you will be asked to consider and approve the proposal from the Bureau to reclaim land and build Integrated Waste Management Facilities (a large scale Incinerator) on land to be reclaimed off South Lantau.

We respectfully ask that you carefully review the facts rather than the false and misleading claims made by the Bureau in their Blueprint which looks like a desperate measure from a team bereft of constructive ideas on how to manage the issue of waste management.

We trust that you can challenge and reject the proposal rather than give it the official endorsement needed to make progress.

In our opinion, the questions to be asked can be based upon the following salient points:

1. The EPD finally admitted in January this year that their evidence for promoting incineration is based on **false and deliberately misleading statistics**. LIM pointed this out to them more than two years ago, yet the EPD insisted that their figures were correct. They now admit that their claim that Hong Kong currently recycles 48% of its waste is wildly over-stated.
2. The statistics also mislead on the **amount of waste imported** into Hong Kong. Importing and exporting waste is not even mentioned in the Blueprint. When

waste management is such an issue, it is very surprising that the Bureau has not been transparent on this point.

3. The misleading information propounded by the Bureau in their Blueprint also hides the fact that their long-term strategic proposal is for the construction of **more than one incinerator** in Hong Kong. This was included in the EIA Report but is not in the Blueprint. Their Paper on Environmental Infrastructure Projects does refer to the IWMF Phase 1, and does refer to the “first incinerator”.
4. The Bureau have consistently **declined to consider alternative and emerging technologies**, preferring to invest Hong Kong taxpayer’s money into old technology that other countries are rapidly moving away from. They appear to be blind in not considering the emerging technologies.
5. A fact-finding visit to Europe has been arranged to study existing incinerators. There is **no plan to visit sites where other technologies are being developed** to dispose of waste. In any case, the visit will take place **AFTER their proposal is reviewed by the Panel on Environmental Affairs**, which is either totally disrespectful of the role of the Panel, or is seen by the Bureau as by-passing the proper processes and protocols. The real purpose of this visit should be questioned as it appears to be for the sake of vanity and to justify the poor decision making by the Bureau rather than an objective review of options. As such, it will be a complete waste of taxpayer’s money.
6. The Bureau has been resolutely quiet on the fact that their incinerator will produce around **1,000 tonnes of residual ash every day** that will need to go to landfills. This means that the debates around landfill use will still not go away.
7. The Bureau still prefer to waste taxpayer’s money on a single large scale solution to the waste management issue rather than spending their energies on reducing the waste problem, **enhancing recovery of materials and promoting recycling**. This may be because **ACTUALLY PROTECTING** the environment by doing the right things is too hard for them to contemplate.
8. Regarding safety, the Bureau must be **challenged to prove that the proposed incinerator will not pose any health hazard to Hong Kong**. Their recently formed and so-called “panel of experts” are nothing of the sort. There is a real shortage of incinerator expertise on the panel of experts, so there is no credibility to the statements made by them. It is a fact that an incinerator **will** release airborne particles into the air, and that these particles **will** be damaging to human health. The only question is about the **DEGREE** of risk involved. The Bureau have been steadfastly quiet on this point,
9. Finally, according to the Bureau’s current estimates, the proposal to build one Incinerator on Shek Kwu Chau will have a capital cost to the Hong Kong taxpayer of around **\$18 billion**. This estimate has increased by some \$3 billion since 2011. The huge scale of this should make the Bureau consider every other option thoroughly before recommending incineration. It appears that they have again taken the easy route rather than the more difficult but more sustainable route.

Clearly the Bureau are backing the wrong strategy for tackling the problem of waste management in Hong Kong, and they are prepared to persist with their poor decision making, even at the expense of the irreversible environmental damage that it will cause to Hong Kong.

We apologise for the length of this letter, but the implications for the whole of Hong Kong are massive and the points all need to be raised.

We sincerely hope that the Panel on Environmental Affairs sees the Environment Bureau's proposal for what it really is, and rejects it out of hand.

Our opinion is that Hong Kong deserves more time and effort to be spent developing effective strategies for the **avoidance** of waste rather than the **destruction** of waste.

Yours Respectfully

The Committee of the Living Islands Movement

20th February 2014

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SIX KEY QUESTIONS ON WASTE MANAGEMENT IN HONG KONG

1. The Bureau has admitted that their statistics for recycling are false and misleading. The previous claims that 48-52% of Hong Kong's waste is recycled have been shown to be incorrect. Waste being imported and re-exported without processing tonnage was previously added to the recycling figure but excluded from the waste generation figure. **How can EPD be trusted on the Blueprint when it is based on such misleading and/or inadequate statistics?**
2. LIM estimates that the true recycling percentage could be less could be less than 10%. It is also clear from everyday observation that there is very little actual waste recycling in Hong Kong. The few "three-colour" recycling bins in use are mostly in obscure or difficult to get to locations, are too small and are badly designed, while the public is given no guidance on what types of plastic and paper waste can be recycled and what not to put in recycling bins. The recycling bins are often overflowing and remain so for days on end. **Why is the EPD ignoring the strong demand from the public to recycle more waste and why are they not making much greater efforts at all levels to provide this most basic waste management infrastructure?**
3. The EPD's strategy for the destruction of waste is based on sending unsorted waste to landfill or mass-burn incineration in a remote location. There are no intermediate steps between collection and dumping or burning. If the IWMMF proposal is implemented, it will effectively rule out waste separation at source, intermediate stage sorting and the development of an effective recycling industry in Hong Kong. There will be no need for any of this is it can all just be burned. **Why does the Blueprint contain no plans for sorting of waste to divert it away from landfill or incineration?**

4. The large-scale incinerator will result in a net daily reduction in waste of 2,000 tonnes, while actually producing around 900 tonnes per day of highly toxic waste in the form of fly ash, which is still be sent to landfill. **How can the huge economic and environmental cost of this IWMF be justified for such a small gain, which could be equally achieved through enhanced waste reduction and recycling?**

5. Moving-grate incineration only achieves a 70% reduction in the amount of waste that is burned. This is at the expense of converting some of the waste into gases that contain poisonous dioxins which are pushed into the atmosphere, and by reducing the rest to a highly toxic ash residue. The claim that this is “Modern” incineration is simply not true. **Why does the Bureau continue to resist other rapidly emerging technologies in the face of the growing evidence that these technologies are gaining acceptance around the world?**

6. **Why is the Bureau leading a delegation of LegCo Members to Europe to study incinerators and alternative technologies only after seeking approval for the outdated mass-burn incinerator?**