

Legislative Council  
Dear Cyd and Panel Members

Date: 10Mar2014

Written Submission to EA Legco Panel on Seeking Fund for the Incinerator 22Mar2014

Before you vote for the incinerator, we urge you to consider carefully on the following points:

Urgency of the project

Other options are feasible that it can be built and put in service in much less time, rather than wasting time by reclaiming land from the sea and destroying the coastline.

Health and Environmental considerations

Many recent scientific publications find health impacts on nearby residents, such as child birth defects and young children with stunted growth, as well as cancers. The incinerator is incompatible to a region that is designated for conservational and recreational uses. Even with EU standards being met, there will be significant impacts on the air quality in Hong Kong territory wide. Don't forget, EU standards do not guarantee having no health impact, just a more stringent guideline.

Alternative Technology

The newly emergent technology, plasma arc gasification process, is becoming a more popular choice, not only worldwide but also in China. In last month alone, a plant treating toxic fly ash from the incinerator in Shanghai and another to treat MSW in Bijie in Guizhou were announced. Zhuhai is planning a 2000 tonnes/day facility. These plans are contrary to the EPD's insistence that such a technology is unworkable and dangerous. This is the evidence of misinformation.

A recent study tour to Europe conducted by the N.T. Concern Group found the new technology is not only more efficient, but less expensive to build and, more importantly, it gives superior air emissions and no toxic ash and residues as byproducts.

It is sinister in our view that the recent tour conducted by Legco to Europe, did not allocate a fair time slot to the new technology. An hour-long talk is hardly comparable to a site visit.

Judicial Review

It is incomprehensible that while the court case is in progress, instead of conducting more public consultations and further reviewing potential project improvements, the government is now seeking funding for the same option, at a time when the basic concept of waste management has changed to focus on more separation and recycling. Is it a case of the government being unwilling to listen and serve its people well?

### Pledge by CE in the Election Manifesto

Mr. C.Y. Leung has made a pledge that no incinerator will be built until recycling of wastes is in place. The policy of recycling is still in its infancy; we are still in nowhere near the legislative process. Once the funding for the incinerator is approved, it will greatly influence the finer details on the degree of recycling. Don't forget, the design of the moving grate incinerator is for complete burning without separation; this will discourage recycling and be contrary to C.Y.'s pledge.

### No New Evidences or Changes From the Last EA Panel submission

The basis for the rejection of last submission to the EA panel was that no recycling is being considered. It is crucial for the panel to see the details of the recycling, to be confident it can go through the legislation processes before approval of funding for the type of technology adopted. It is obvious that recycling of waste in Hong Kong is not easy for the government to implement, as it will involve not only many social and financial aspects, but will also have impacts on the many stakeholders within the legislature.

There is a need for more evidence to show the government has performed in depth analyses on the financing, the recycling business infrastructures, better technologies for the environment, and final outlets for the recycled materials and products. Any approval of funding at this stage would be premature and unnecessarily expensive, and prove contrary to the aim of a greener Hong Kong. By approving incineration at this stage, the panel would be seen as a rubber stamp for the government.

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