

THE LEGISLATIVE COUNCIL
PANEL ON ENVIRONMENTAL AFFAIRS
Special meeting on Saturday, 22 March 2014 to discuss
waste management in Hong Kong

Honourable Members,

Thank you for giving me the opportunity to submit my views on waste management in Hong Kong. I write as a long-term resident of Hong Kong, which I have made my permanent home, because I am concerned for:

- the well-being of future generations in Hong Kong and
- the environment of Lantau, where I have lived for almost twenty years.

This submission focuses on the Administration's proposal to build one of the world's largest incinerators at Shek Kwu Chau. My arguments against this proposal fall under the following headings:

- 1) **Risks to Hong Kong's standing as a centre of international excellence**
- 2) **Health concerns – questions unanswered by the government**
- 3) **Cost - escalation**
- 4) **Destruction of the visual environment**
- 5) **Destruction of potential for sustainable development: why we need South Lantau to be a centre for eco-tourism and play its part in diversifying Hong Kong's economy**
- 6) **Long-term unknowns –To what extent can the Government be trusted on environmental issues? What if waste is imported from elsewhere or the emissions fall below the standards promised?**

1) **Hong Kong's standing as a centre of international excellence**

Hong Kong, despite its small size, ranks highly in the world as a place of high standards with a well-educated population. This applies to our legal system, public healthcare (how we handled SARS for instance), our secondary students' performance in the international PISA tests, our well-regulated financial markets and free economy, and our recognition of the importance of transparency and good governance in public affairs.

Where Hong Kong does not rank, however, is in environmental conservation. The Shek Kwu Chau incinerator proposal will damage Hong Kong's international standing because:

a) **It is a vastly-oversimplified response to the complexities of waste management:** in a number of EU countries, for instance, the standard procedure for waste management is to focus first on recycling and only to incinerate what really has to be burned. There is an awareness that we all have to consume fewer resources and that those we must use should be reused and recycled. Recycling in the UK, for instance, is very product-focussed and some local authorities have specific and significant targets for what percentage of waste should be recycled.¹ Hong Kong produces more waste per capita per day (1.36kg) than Tokyo (0.77kg)

¹ <http://www.sita.co.uk/downloads/Kirklees-web.pdf>; <http://www.sita.co.uk/downloads/SouthGlos-web.pdf> These are just two of several interesting examples available on just the website of just one waste disposal company.

or Seoul (0.95kg).² Yet in Hong Kong, recycling has not been given a proper chance. The Living Islands Movement estimates that the true recycling percentage could be less than 10%. It is also obvious from everyday observation that there is very little actual waste recycling in Hong Kong. The few “three-colour” recycling bins in use are often in obscure locations and are too small, 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. Despite the Environment Bureau’s (EB) aspirational statements on recycling in its recent ‘Blueprint’³ the Government has yet to demonstrate that it can establish recycling properly. It seriously lags its international peers, both national and municipal.

b) If the Shek Kwu Chau proposal is implemented, there will be no incentive to do anything other than burn and Hong Kong will continue its excessive use of resources. There are currently no plans for sorting of waste to divert it away from landfill or incineration. The proposed 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. The super-incinerator will be convenient in the short term but contribute nothing to the regional environment in the long term. It will effectively rule out implementation of waste separation at source, intermediate stage sorting and the development of an effective recycling industry in Hong Kong.

It is possible to create sustainable jobs by developing a recycling industry – most of those arising from incinerator construction will only be temporary.

c) The decision-making which led to the choice of one super-incinerator in an area of outstanding natural beauty was not for environmental reasons but for narrow, politically convenient reasons. This choice of site is reminiscent of cronyism and reflects poorly on the quality of decision making by the Hong Kong government’s administration.⁴ Choice of this site, which will ruin the environment of South Lantau and Cheung Chau, will give Hong Kong a reputation for poor governance in the eyes of the general public and the international community. Hong Kong deserves better.

2) Health concerns – questions unanswered by the government

a) 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 will still be sent to landfill.⁵ **How can the huge economic and environmental cost of this incinerator be justified for such a small gain, which could be equally achieved through enhanced waste reduction and recycling?**

b) 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.⁶ **Why does the Environment Bureau continue to resist other rapidly emerging technologies in the face of the growing evidence that these technologies are gaining acceptance around the world?**

² <http://www.enb.gov.hk/en/files/WastePlan-E.pdf> p. 8

³ <http://www.enb.gov.hk/sites/default/files/WastePlan-E.pdf> p.13 onwards

⁴ *South China Morning Post* 13 April 2012 – article by Dr. Tom Yam

⁵ Living Islands Movement

⁶ Living Islands Movement; *South China Morning Post*, 31 January 2013, article by Dr. Tom Yam; for a refutation of the EB’s arguments against plasma arc waste treatment see *South China Morning Post* 30 January 2014, letter by Dr. Martin Williams.

c) The EB continues to cite European Union standards (not guaranteed to be a panacea) while **failing to address directly the studies linking proximity to incinerators and increased risks of cancer and birth defects: why won't it deploy scientists to do this?**

d) **The EB has implicitly admitted that the emissions from the proposed incinerator will be dangerous by refusing to consider building it either at one of the other, less ecologically sensitive, sites originally evaluated by an external consultant in 2007.**⁷ Would it contemplate building it in Central? If the proposed incinerator is so safe, why does it have to be in an area of low population where street protests are conveniently unlikely? And why does the chimney have to be so high that it will permanently ruin the view from most of the still-pristine beaches on South Lantau?

3) Cost – escalation

The current cost of the proposed incinerator is estimated at HKD18bn but this has increased by some HKD3bn since 2011. **That represents a 20% increase on the 2011 estimate.**⁸ How can we know what the final cost will be? What checks and balances are there? What is going on behind the scenes here? By contrast, other waste disposal sites, even for incinerators, would be far more cost-effective.

4) The visual environment

As just asked - **Why does the chimney of the proposed incinerator have to be so high that it will permanently ruin the view from most of the still-pristine beaches on South Lantau?** Do the officials of the EB have absolutely no sense of beauty whatsoever? This degradation of the landscape will destroy a priceless asset for future generations and earn Hong Kong only ridicule in the world of environmental conservation.

5) Sustainable development: South Lantau as a centre for eco-tourism and its potential role in diversifying Hong Kong's economy.

As Hong Kong's urban population grows, in a climate of growing discontent with high property prices, it's more important than ever to have accessible open spaces for low-cost, activity-based leisure such as hiking, swimming and camping. But who will want to visit South Lantau and Cheung Chau when there are so many question marks over the health risks associated with the proposed Shek Kwu Chau incinerator?

The government knows that it has to help the Hong Kong economy diversify away from finance, property and shopping malls. Diversified tourism, especially eco-tourism, would be a good way to do this, particularly after the opening of the Zhuhai Bridge. But with the visual landscape of South Lantau ruined, and with health questions hanging in people's minds, Lantau will not be able to participate in this.

And, as a side-note to this, the planned incinerator will destroy the value of investments in property and infrastructure in South Lantau being made with a view to tourism development – Lantau developers take note.

6) Long-term unknowns – To what extent can the Government be trusted on environmental issues? What if the emissions fall below the standards promised or waste is imported from elsewhere?

a) Let us think for a moment about how the government has approached the issue of air pollution, refusing for many years to adopt WHO standards. Hong Kong air quality still suffers because of pollution from local sources such as vehicle emissions. Bans on idling engines are not properly enforced. Other examples of failure to protect the

⁷ *South China Morning Post* 13 April 2012 – article by Dr. Tom Yam.

⁸ Living Islands Movement

environment include the loss of habitat for the Chinese white dolphins endangered by construction of the Zhuhai Bridge. The Government has failed to enlist local councils and village committees to prevent the dumping of household bulk refuse: in Mui Wo, old furniture and sometimes dangerous waste such as paint is routinely left by the dustbins for instance. Little is done to address noise and light pollution. In the meantime, there are reports that the Government has in fact commenced preparatory work at Shek Kwu Chau before LegCo has had a chance to consider the matter properly.⁹ And what of the public tender process to award waste management contracts? It has further been suggested that the EB awarded the contract to manage the Shek Kwu Chau incinerator in 2011.¹⁰ **If the incinerator is built, how can we trust the Environment Bureau to measure emissions accurately and if the emissions exceed safety levels, would they decommission the incinerator?**

- b) **Given the escalating costs of the incinerator plans and the exceptionally large capacity it will have once completed, it will be all too convenient for the Government to offset the costs by importing waste from elsewhere, such as from the Pearl River Delta where cities are grappling with similar disposal problems. But would this be fair to the local population who would be exposed to the emissions and what control would we have over the content of such waste?**
- c) The document CB(1)931/13-14(01) which has been submitted to LegCo is full of promises but given the apparent reluctance of the EB to engage in honest scientific debate with the environmental groups concerned,¹¹ it is not clear how the Government could be held to these undertakings. I would suggest that LegCo and the general public **are being asked to take far too much on trust.**

In conclusion, despite the urgent nature of this issue, I would urge the Government, LegCo and the local academic and environmental community to undertake a thorough, properly researched and independent re-examination of Hong Kong's waste management.

Yours sincerely,

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⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ For example, see *South China Morning Post*, 22 August 2013, 30 January 2014, 27 February 2014, letters from Dr Martin Williams, Director, Hong Kong Outdoors