



香港廢物管理學會

**Hong Kong Waste Management Association**  
**P.O. Box 28705, Gloucester Road, Hong Kong**  
<http://www.hongkongwma.org.hk>

---

19 Dec 2017

Legislative Council of HKSAR  
Panel on Environmental Affairs

Dear Hon Tanya Chan,

Re: Measures to assist the recycling industry to meet the Mainland's tightened requirements for import recyclables

Hong Kong Waste Management Association (HKWMA) is the premier organization representing professionals in Hong Kong's solid waste management and environmental industries and we take an active interest in all areas represented by our membership. Since our inauguration 23 years ago, HKWMA has been witnessing the evolution, needs and challenges of waste management issues in Hong Kong.

The tightened requirements taking effect in China by 1 Jan 2018 is an alarming crisis. The HKWMA has been in communication with overseas counterparts during the last few months. Many exporters relying on China recycling capacities are panicking and it is believed that other recycling facilities within the ASEAN region cannot cope with the demands the tightened requirements (or commonly viewed as waste ban) in China has created. As a result, there would have limited options but to force exporters to dispose of these recyclable materials to local landfills and/or thermal treatment facilities, prompting the whole recycling industry to handle them in a different approach. We should use a long term circular economy approach to choose what we should do today.

Since the bankruptcy of Concordia Paper, a Hong Kong paper recycler, in 1998, majority of used paper generated in Hong Kong have been sent to mainland China for recycling. Our government has been educating citizens in Hong Kong to reduce, reuse, segregate and recycle various materials for proper handling and recycling. Should we inform the general public the only option of the banned materials being landfill disposal, unfortunately, it would be a big slam on our 20 years of environmental

**Working towards Effective Waste Management for a Sustainable Society**

**投入廢物管理建設社會未來**



香港廢物管理學會

**Hong Kong Waste Management Association**  
**P.O. Box 28705, Gloucester Road, Hong Kong**  
<http://www.hongkongwma.org.hk>

---

education.

In reducing plastic wastes, our government has taken lead to stop selling plastic bottle beverage within government facilities. This is a good gesture which encourages private sector to follow; at the same time, initiatives by other stakeholders in promoting the use of environmentally friendly, reusable containers are seen more frequently.

To expedite the legislation of Municipal Waste Charging, and in the medium to long term, proactively promote the bulk purchasing and recyclable/environmentally friendly packaging materials are critical to the overall sustainable waste management.

In the short term, when disposal of recyclable resources to landfill is not preferred and there is no immediate solution for proper recycling, we should consider relevant feasibility studies of converting wastes for energy recovery through our existing thermal facilities (T-park and Chemical Waste Treatment Facility) and other smaller scale technologies adopted overseas (e.g. Japan). We should not wait until the commissioning of the newly awarded Integrated Waste Treatment Facility Phase 1.

Government should holistically evaluate the actual cost of not recycling/treatment these recyclable materials. Instead of only accounting for the \$165/ton landfill charges, the general public should be informed of the operating cost of landfill, collection fees of wastes through FEHD and government contractors, investment cost of waste treatment & relevant infrastructures, environmental education spending, the respective government departmental expenditure for relevant services, and, last but not the least, the opportunity cost of not having a circular economy. Such social cost should be shared among our citizens to arouse overall awareness on the imminent implication.

“Own waste, own recycling/treatment” is more than a motto. How to make it work? Special funding from recycling fund would alleviate part of the challenge. However, recycling industry as a whole actually needs a much more aggressive government action to drive extensive & genuine green purchase so as to create the markets for local recyclers to survive. With successful experiences observed from overseas, our

**Working towards Effective Waste Management for a Sustainable Society**

**投入廢物管理建設社會未來**



香港廢物管理學會

**Hong Kong Waste Management Association**  
**P.O. Box 28705, Gloucester Road, Hong Kong**  
<http://www.hongkongwma.org.hk>

---

recycling industry is not unaware of advanced technologies that would upgrade the value of recycled products, yet they need some external boost in surviving the “infant” stage - Government purchase policy on locally recycled products needs to incorporate out-of-the-box thinking. Under the “lowest-bid-wins” rationale, local recyclers have frequently lost to a cheaper offer by mainland recyclers and overseas competitors who bring in overseas recycled products from overseas materials. They are told the government is bounded by stringent guidelines set by World Trade Organization, and no preferential purchase on locally recycled products can be adopted. Thus, the enthusiastic local recyclers lack enough time, opportunity and talents to survive the competitions and run out of business soon before they maintain a sizable operation to recycle local resources. The future generations may fail to see the future of the recycling industry when considering their career paths. A viscous cycle would continue.

Few years ago the HKSAR government has highlighted the environmental industry as one of the new economic pillars of Hong Kong. When governments from Korea, Japan, Singapore, Taiwan, etc. would have a viable policy to support locally made recyclables, why couldn't Hong Kong be more creative to seize the opportunity? The laissez-faire approach to this issue should come to a stop.

The Chinese saying “When there is a crisis, there is an opportunity” ponders further thinking. The current waste ban may assimilate the labor pains, but we hope our relevant stakeholders would work together to withstand the current challenge to strive for a sustainable waste management future.

For & on behalf of HKWMA,

Victor C. Li  
Immediate Past Chairperson

**Working towards Effective Waste Management for a Sustainable Society**  
**投入廢物管理建設社會未來**