



THE CHARTERED INSTITUTION OF
WATER AND ENVIRONMENTAL MANAGEMENT
HONG KONG

Our Ref.: L0012092006

Date: 22 September 2006

Advisory Council on the Environment
40/F, Revenue Tower,
5 Gloucester Road,
Hong Kong

(Attn: Miss Sarah Ng)

Dear Miss Ng,

Re: Response to A Policy Framework for the Management of Municipal Solid Waste (2005-2014)

With reference to the ACE open forum on the Policy Framework for the Management of Municipal Solid Waste (2005-2014), we would like to offer our comments as follows:

1. Background

Pursuing the recommendations as set out from the Waste Reduction Framework Plan that was launched in 1998, the Environmental Protection Department (EPD) has published a Policy Framework for the Management of Municipal Solid Waste (2005-2014) in late 2005 to formulate new strategy towards the management of municipal solid waste (MSW). A series of policy initiatives covering MSW charge, Producers Responsibility Scheme (PRS), landfill bans, etc. were introduced. The Chartered Institution of Water and Environmental Management Hong Kong (CIWEM HK) would like to express its views on the government's roadmap on various municipal solid waste control measures as well as its identified waste treatment technologies.

2. CIWEM HK's Views

CIWEM HK supports the Government Acts on setting up the 3 objective targets for the management of municipal solid waste (MSW). To achieve all these 3 objective targets, we consider the Government must devote all the necessary resources on policy formulation, introduction of effective waste treatment technologies & management measures, and to provide infrastructure support towards waste separation and minimization.

2.1 Policy Formulation

- 2.1.1 When the Government formulates the Product Eco-responsibility Bill for the Producer Responsibility Schemes (PRSs), CIWEM HK suggests the Bill define clearly the respective responsibilities among all the stakeholders of the products supply chain, i.e. from manufacturer to consumer. To this end the Bill should ensure the manufacturer (as well as importers, wholesalers, retailers, etc.) to bear the responsibility from designing (during design stage) to collecting & recycling (during product end of life) as many recyclable components as possible, whereas the consumer should think carefully on whether to dispose the product or prolong using the product before the end of its life.
- 2.1.2 The MSW charge is certainly the key towards waste avoidance and minimization by changing people's wasteful behaviour. The Government should provide continual education to the community for the concept of waste minimization, waste separation at source, reuse, recycling & recovery, etc. to make sure the citizens are ready. Incentive measures on sliding scale of payment schedule should be formulated to encourage stakeholders to generate as less wastes as possible. While we fully support the Government to impose MSW disposal charge, we suggest the Government conduct full consultation on the MSW charging scheme such that all levels of the community can be participated to refine the scheme, if necessary. By doing so, wide spectrum of acceptance from the community can be obtained before the Government puts up the Bill to the Legislative Council.
- 2.1.3 The introduction of EcoPark is a great government initiative to facilitate recycling and environmental industries to develop advanced & cost effective technologies to handle the generated MSW in Hong Kong. To facilitate the growth of recycling industry in Hong Kong, we suggest the Government consider setting up green procurement policy among bureaux and departments to support the use of recycled products.

2.2 Introduction of Effective Waste Treatment Technologies & Management Measures

- 2.2.1 CIWEM HK fully agrees that there are unavoidable wastes that must be handled. Hence the introduction of the state-of-the-art waste treatment technologies with carefully planned capacity of the treatment equipment is needed. With all possible measures performed to reduce, reuse and recover wastes at source, the Government has to take up the responsibility to handle the rest of the wastes generated from the community.
- 2.2.2 When the Government handles the biodegradable materials, a centralized composting plant may not be the best solution. It would not be cost effective to transport all the "wet & heavy" biodegradable waste from all over Hong Kong to a single point since the transportation cost is so high and also there is possible contamination of public road from the leakage of leachate from the biodegradable waste containers. With proper control on the installation of effective in-vessel biological treatment systems, the biodegradable materials (such as food waste) can be treated on-site or in a number of decentralized sites with minimal nuisance to the neighbours.

- 2.2.3 The adoption of the Mechanical-Biological Treatment (MBT) Plant should be critically reviewed as there are not too many successful experiences around the world on the effective implementation of MBT.
- 2.2.4 Thermal treatment should be the ultimate treatment facility for the non-recyclable wastes. Criteria for technology and site selection are crucial and should be diligently developed, in particular to choose proven technology with demonstrated cost-effectiveness in terms of capital & operation and available benchmark cases, etc. Due consideration should be given to the potential secondary environmental impacts arising from those facilities, which need to be seriously assessed and mitigated. For instance, potentially toxic emissions, odour nuisance, noise, etc. are among them. The capacity of the equipment should be carefully selected by taking into account the possible reduction on the total amount of MSW after the launching of MSW charge.
- 2.2.5 Landfill bans on biodegradable wastes, bulky electrical appliances, vehicle tyres, etc. after the launching of PRS should be imposed.
- 2.2.6 The existing funding support from the Government, such as Environment and Conservation Fund, Innovative and Technology Fund, and funds for small and medium enterprises, does not carry a very clear theme to encourage the research and development of new recycling technologies. CIWEM HK considers the Government should set up a designated funding to facilitate the R&D of locally initiated new recycling technologies.

2.3 Infrastructure Support towards Waste Separation and Minimization

- 2.3.1 While there is no doubt that the Government has devoted huge resources in the publicity and education campaign in changing the citizens' mindset on their wasteful habits, we believe certain infrastructure support should be provided to facilitate the effective separation and collection of recyclable materials at source. CIWEM HK suggests the Government implement the mandatory requirement to provide a refuse storage and material recovery area on each floor of the new and existing residential buildings, except those very old and small buildings that are physically non-feasible to implement.

Should you have any queries on the above comments, please do not hesitate to contact the undersigned at 2788 5647, email: kenny@hkpc.org or Ms Philomena Lau at 2788 5367, email: philomena@hkpc.org.

Yours sincerely,



Kenny Wong
Chairman, CIWEM HK