

By post and by fax at 3529 2837

12 December 2013

Clerk to Panel
Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central Hong Kong

[Attn: Miss Lilian MOK]

Dear Miss MOK

**LegCo Panel on Environmental Affairs – Meeting on 16 December 2013
Views on Public Engagement on Municipal Solid Waste Charging**

Thank you for inviting the Institution to put forth our views on the captioned subject.

In response to your invitation, we are pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you for your attention.

Yours sincerely



Ir Raymond CHAN Kin Sek
President
The Hong Kong Institution of Engineers

Enc

RC/WC

Enclosure

**Legislative Council
Panel on Environmental Affairs**

**Views from the Hong Kong Institution of Engineers
on Public Engagement on Municipal Solid Waste Charging**

The Hong Kong Institution of Engineers (HKIE) recognises the urgent need to reduce municipal solid waste (MSW) in Hong Kong. We agree in principle the implementation of a quantity-based MSW charging scheme as part of a comprehensive approach to achieve waste handling and reduction. We welcome the Administration's endeavour in preparing the consultation document with due considerations of various unique factors and issues with regard to the context of Hong Kong. The HKIE would like to provide our further views as follows:-

Charging Mechanism

2. Currently, the MSW generated from Commercial and Industrial (C&I) sector is usually collected by private service providers and the charging is based on the volume of waste. If C&I waste is to be charged only by weight as suggested in the consultation document, it is necessary to devise a charge sharing mechanism as loads of waste will normally be collected from different producers before being sent to landfill sites.
3. We opine that it may not be fair to some companies within the C&I sector for MSW charging at landfills or Refuse Transfer Stations (RTS) if it is by weight only. It is suggested to allow flexibility for the C&I sector to select either to pay "by volume" or "by weight" for MSW depending on the respective business nature. Also, pre-paid designated garbage bag is also proposed as an alternative for waste disposal for the C&I sector. This allows flexibility in particular for the industrial/commercial buildings with various occupants of small companies or companies which do not generate much waste.
4. For the domestic waste producers, charging mechanism using pre-paid designated garbage bags is considered the most effective means in reducing waste by triggering people's behavioural change. We believe that this approach can provide significant incentive for every citizen to generate less waste by following the 4R principles (i.e. reduce, reuse, recycle and recover) which is in line with the rationale behind the MSW charging scheme. To enhance the effectiveness, fairness and transparency of the implementation of the charging scheme, the Government could consider different sets of pre-paid designated garbage bags for households and buildings as a whole. The pre-paid designated garbage bags from each household/unit collected could be stored in a designated garbage chutes or large collection bins for buildings or housing estates for easy identification and to ensure that all the collected waste would be charged. Fines/charges for inappropriate dumping by using non-designated bags could be considered and estate/building management companies should be encouraged to identify ways to prevent illegal dumping.

Coverage of the Charging Scheme

5. While a phased charging approach has its own advantage in minimising the impact to the community, the implementation of MSW charging scheme to all sectors in one go could be the most consistent way to address the waste problem soonest possible if circumstances allow.

Charging Level

6. We are of the view that a high charge at the initial stage is not suggested as the effectiveness of the scheme can be frequently reviewed to further optimise the charging level. However, the charging level should be the same irrespective of the sectors. This is to avoid the transshipment of waste from one sector to another. Similarly, as the purpose of the charging scheme is to reduce waste generation rather than handling cost recovery, the rate charged should not vary for locations of waste collection.

7. We support the suggestion to set a certain threshold for MSW disposal, under which no charge will be required, as this will provide more incentive to foster behavioural change on waste disposal. It is also supported to establish recognition award for those “best estates or best buildings in waste reduction” as an incentive to achieve the MSW reduction target. Moreover, concessionary arrangement should be developed to reduce the impact of MSW charging on low-income families.

8. The HKIE views that the level of MSW charge at the initial stage should be kept simple to ensure the quick and efficient implementation of the waste charging scheme. However, once interim results and experiences are consolidated and a public consensus to revisit the scheme is reached, a stepping arrangement in charges could be considered by the Government. Low waste generation sector/group can be charged at a lower rate of charge to encourage behavioral change on waste reduction.

Recycling

9. We would like to reiterate that the Government should provide financial incentive to support the development of recycling industry. It is anticipated that more recyclable waste material will be collected after the implementation of waste charging scheme. The Government may consider establishing a fund which assists the private sector in collecting and disposing of the end-of-life products and provides initiatives for sector to deal with the collection, disposal and treatment of the recyclable waste material including car batteries, light bulbs, lubricants, plastic, papers, metal products, etc.

10. The Government should also consider setting up more collection points for recyclable material other than paper/aluminium can/plastic (e.g. battery, metal products, light bulbs, etc.) for the C&I sector so as to encourage and facilitate recycling.

11. For domestic waste, it is suggested to provide different types of pre-paid designated garbage bags to facilitate the segregation of waste into dry and wet (i.e. food waste), allowing recycling activities to be carried out in a more effective way.

Others

12. In addition to the suggestions as proposed above, we also opine that suitable time intervals to review the whole waste charging scheme after its full implementation should be considered for devising improvement plans accordingly.

13. The consultation document mentioned the installation of CCTV at each floor to prevent fly-tipping. We are concerned that this may cause significant workload to the building management offices taking into consideration the numbers of high rise buildings in Hong Kong. In addition, installation of CCTV may hinge on the issue of privacy protection and may need to be carefully dealt with.

14. We notice from the consultation document that the number of public litter bins is proposed to be reduced in order to avoid potential illegal dumping. However, it is reckoned that the reduced provision of refuse collection points and public litter bins might cause environmental hygiene and public health problems, as well as inconvenience to tourists and visitors. Therefore, the number of public litter bins is suggested to be reduced only in a gradual manner at the initial stage and is subject to review at appropriate intervals.

15. As proposed in the consultation document that the charging would be based on weight, we opine that weight checking facilities should be available at all RTS or landfills in order to provide weighing service for determining the waste charge for the private refuse collection vehicles.

16. The success of MSW charging scheme is highly dependent on various factors including the Government's support to the recycling industry and education to the public. The recycling industry always faces various challenges in running business and to survive. The Government should take the leading role in changing the behaviour of commercial, industrial and domestic sectors on waste disposal. Furthermore, the tax collected from the waste charging scheme should be allocated to educate the public and subsidise the recycling industry if appropriate.

17. Despite our agreement to consider adopting waste charging scheme, we consider that mere waste reduction and recycling measures are not adequate to solve the waste problem. Hong Kong still needs to find ways to dispose of the final waste. To achieve this, it is necessary to have modern waste disposal facilities along with proven technologies such as the "waste to energy plant" to substantially reduce and stabilise waste prior to the final disposal.