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17 March, 2014

The Hon Cyd Ho Sau-lan  
Chairman, Panel on Environmental Affairs  
Legislative Council  
2/F, Legislative Council Complex  
1 Legislative Council Road  
Central, Hong Kong

Dear Cyd,

**Environmental Infrastructure Projects**

The Hong Kong General Chamber of Commerce would like to submit our views on the above subject to be addressed at the forthcoming LegCo Environmental Affairs Panel meeting on 22 March, 2014.

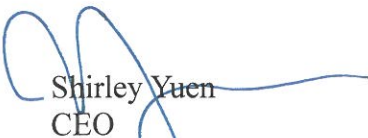
The Chamber supports the Government's recent efforts to tackle Hong Kong's looming waste challenges, and we believe that adequate waste treatment and disposal infrastructure facilities must be in place first for any waste management strategy to be successful and sustainable. Without any viable alternative solutions at present, expanding landfills seems to be the only feasible option.

Although the Government has introduced additional measures to minimize the impact of landfills on nearby residents and the environment, we would like to stress that expanding landfills is only an interim measure. Ongoing and new waste management initiatives have to be pursued in tandem, because relying on landfills is unpopular and unsustainable in the long run. Given the growing consensus among the community to develop effective large-scale integrated waste management facilities, we urge the Government and the Legislative Council to work together and muster the political will to expedite solutions, so as to ensure the setting up of a clean and sustainable waste disposal system for Hong Kong.

Attached is a summary of our views, and I hope you will find it useful.

Thank you.

Best regards

  
Shirley Yuen  
CEO

c.c. Ms Christine Loh, Under Secretary for the Environment

## HKGCC's Views on Environmental Infrastructure Projects

1. The Hong Kong General Chamber of Commerce ("HKGCC") has long been a supporter of the polluter-pay principle and a strong advocate of a comprehensive package of waste management measures. While we are glad to see the Government's efforts in reducing waste at source in recent years by initiating several producer responsibility schemes, engaging the general public into the discussion of waste charging mechanism and earmarking a Recycling Fund to support the recycling industry, we have to face the stark fact that **Hong Kong remains primarily relying on landfills to dispose of the thousands of tonnes of municipal solid waste that we throw away daily, until those waste policy measures are fully in place.** Without immediate action, we shall encounter severe challenges for waste disposal in the coming few years.

### Landfills Expansion

2. The Government has pointed out that our neighbouring jurisdictions all adopt a combination of alternative measures in addition to the less desirable landfills as waste disposal solutions. Unfortunately, landfills expansion to dispose of our non-recyclable and residual waste seems to be the only feasible option at present considering the imminent urgency of the waste issue and length of time required for the other initiatives to get approval and implement. **Therefore, HKGCC supports the Government to expand the three strategic landfills as an interim measure.** Concurrently, ongoing and new waste management initiatives have to be pursued with a faster speed and greater effort, as continual reliance on landfills is obviously unpopular and unsustainable in the long run.
3. **HKGCC fully understands the expansion of landfills will be a burden for local residents; hence we have been urging the Government to develop a comprehensive plan to minimize the nuisance caused by landfills operation and expansion projects.** We support all enhancement proposals, such as:
  - Amending the waste disposal regulation to allow South East New Territories ("SENT") landfill in Tseung Kwan O to receive only construction waste;
  - Moving SENT landfill extension part farther away from existing residential developments to increase the intermediary buffer with greenery in-between;
  - Optimizing the use of the refuse transfer station system through fee reduction to reduce road transport of waste to landfills; and
  - Implementing other improvement measures concerning SENT, North East New Territories ("NENT") and West New Territories landfills extensions.
4. In addition, **HKGCC welcomes the setting up of both the Restored Landfill Revitalisation Funding Scheme** to expedite the development of community, environmental and recreational facilities at restored landfills, and **the District Liaison Group** to enhance communication with the local districts.

5. A landfill gas treatment project has been in operation in NENT landfill since 2007 to provide renewable energy source. The Government should accelerate the development plan of utilizing landfill gas on the other two strategic landfills to support energy demand in the nearby districts.

### **Integrated Waste Management Facility**

6. Even with more aggressive waste reduction and recycling programmes being taken forward as planned, there will still be a massive volume of waste (estimated at about 10 000 tonnes daily in 2017 by the Government) requiring disposal. Controversy and political sensitivity notwithstanding, incineration remains a reliable method of bulk reduction.
7. **According to the HKGCC Annual Business Survey conducted in November 2013, 74.9% of respondents supported building waste incinerators.** The Survey also reflected the growing consensus among the community to develop effective large-scale integrated waste management facilities, up by 15.2 percentage points from 2012.
8. Hong Kong is a “unique” case of lacking an incinerator among advanced economies in Asia. Through education, discussion and demonstration of the stringent emission standards and safety of modern integrated waste management facilities, combined with the support of the business community, the Government, must step forward to carry out the development plan of building the Integrated Waste Management Facility, as it requires a lead time of about seven years before it can come into operation.

### **Conclusion**

9. For the sake of providing a clean and sustainable environment for us and our next generations, we urge the Government and the Legislative Council to work together and muster the political will to adopt immediate actions to deal with the mounting waste problem of Hong Kong.

HKGCC Secretariat  
11 March, 2014