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「膠袋收費計劃」 意見書

香港塑料袋業廠商會

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香港塑料袋業廠商會

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膠袋收費 沒環保成效更害了地球

一、 立場

業界反對政府沒有深入研究環保策略，便推行這個沒有成效的收費政策。更遺憾的是政府務求短時間內增加庫房收入與民望，向公眾傳達錯誤信息，漠視外國膠袋稅失敗的實證，並以「減用膠袋就是環保」的口號一意孤行地去推廣膠袋收費。

二、 實況

開徵「環保稅」首先要了解究竟甚麼才是「最不環保」。「環保稅」目的是「多用環保物料」、「減少濫用」、「延長堆填區壽命」、「提升環保意識」，如果認同此觀點的話，那麼現時的徵稅對象怎也輪不到膠袋。

- 90%市民有重用膠袋的習慣，膠袋並沒有被「濫用」
- 棄用最環保的包裝物料，造成生態大災難
- 膠袋緊佔堆填區 0.1%，減少膠袋絕不可延長堆填區的壽命
- 漠視國外失敗例證，政府硬銷膠袋收費

台灣 ----- 膠袋垃圾由 5000 萬公噸激增至 9000 萬公噸

去年 5 月起小吃店解禁不收膠袋費

愛爾蘭----- 膠袋總量不減，紙袋耗用量更多

垃圾袋銷量上升 1000%

今年再加膠袋收費

蘇格蘭----- 膠袋稅物非所值，去年蘇格蘭政府撤銷徵收膠袋稅建議

澳洲----- 政府一份獨立調查報告：禁用膠袋帶來更嚴重的環境問題

德國----- 禁用膠袋對環境損害更大

- 「無膠袋」贏了膠袋數字，輸了環保成效

嚴格來說，無膠袋活動呼籲自備購物袋，但派發的亦是膠袋(不織布袋)，間接鼓勵市民改用更不環保的包裝物料。最終減少了膠袋，卻倍上了更大的污染代價。

三、 建議

- 選用較環保塑料：由於市場(包括政府)採購以價為先，政府應資助、鼓勵用較環保塑料產品，現在我們面對“有貨冇市”情況。
- 回收工作：由政府做起，收集各部門、診所、馬會等膠袋垃圾，由同業回收再造成再生塑料產品，以優惠價予政府回購，達善用資源之效。(如再造紙)
- 推廣「自備環保袋」包括膠袋，鼓勵製造優質的環保膠袋：由政府訂立優質標準，讓膠袋更耐用。
- 訂立減少膠袋使用量的目標，設立獎勵制度，讓大眾達標，那比懲罰性收費更有效更省資源。

四、 結論

業界支持環保，但環保也要用得其法。但依據環保署所訂之膠袋收費條例，業界明知不可為而為，最後，稅收只會變成增加政府收入的工具又沒有環保成效。盼政府有一套清晰、切實可行的環保措施。否則膠袋收費一旦實行，結果只會肥了政府，苦了市民。

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膠袋收費對環保沒有成效

塑料袋是最環保的包裝物

塑料袋是二十世紀重大發明之一，亦是人類進步文明的象徵，我們相信只要用得其法就是最環保的。塑料袋的主要原料是石油副產品聚乙烯（PE）與聚丙烯（PP），佔石油消耗量的 2%，塑料袋亦無需要額外開採天然資源製造，故塑料袋可說物盡其用。而且塑料產品亦是最環保的包裝物料，塑料袋方便、輕巧、耐用、可塑性高、防水防菌、價格便宜、更可回收再用，現今亦暫沒有其他包裝產品可比美。塑料袋的發明為人類帶來方便、衛生的生活。塑料袋的出現亦減少了浪費食物的情況、防菌防霉的性質也保護了人類的健康，塑料袋也可代替其他包裝物料，如罐頭、紙、玻璃等，以減少能源損耗、溫室氣體排放量等。基於塑料袋各種的好處，塑料袋一直被廣泛使用。

濫用與否 應從實際中作客觀比較

塑料袋對人類作出很大的貢獻，可是政府和許多綠色團體卻將塑料袋污名化。他們將廣泛使用指作濫用，讓塑料袋套上污染源頭的罪名。首先，政府與綠色團體一直表示港人有濫用塑料袋和浪費資源的習慣，為堆填區造成不必要的負擔，但他們卻沒有了解塑料袋使用的實際情況。日常生活中，市民使用的塑料袋中已有 90%是重用(Reuse)的，當中大部份都被用作垃圾袋，完全切合環保理念，而未經使用而被棄置的塑料袋為數不多，故指塑料袋被濫用和「揮霍」地消耗絕對不公。因此，要評定塑料袋濫用與否，必須從實際情況中作客觀比較。

另一方面，政府與綠色團體指因港人濫用塑料袋，故塑料袋垃圾量遠超歐美國家。其實塑料袋垃圾量的多寡的原因亦要考慮不同的生活文化與飲食習慣。由於文化有別，中國人的垃圾亦與外國垃圾不同。舉例如處理魚類垃圾，中國人吃魚後的垃圾較多(包括:魚頭、魚骨、魚尾與蒸魚豉油)，而外國人吃的多是魚扒，廚餘相對較少及較易處理。如果港人棄用塑料袋包裹垃圾，相信要用上二十多張報紙才可處理中國人的魚垃圾吧!以紙取締塑料袋，相信也會苦了我們的樹林。

塑料袋商堅定環保責任

隨著塑料袋使用率增加，同業亦一盡社會責任，近年更致力將環保技術應用於工業上，積極研製環保技術，投放大量資金於環保考量的問題上，尖端科技的膠袋工業已由原材料、多功能性、循環再造與嶄新設計等方面不斷研發，務求將科技與環保兩者間取得平衡。人造紙、純天然植物塑膠原材料、多功能多層阻隔複合膜、降解塑料袋等都是同業的環保產物。本會務求肩負生產者的社會責任，主動與生產力促進局合作舉辦綠色塑料薄膜包裝研究項目，提升綠色塑料薄膜技術。可是政府一直沒有正視塑料袋的環保特性，推動環保工作又不夠全面，令大眾對塑料袋產生謬誤，成為萬惡不赦的環保公敵。

膠袋收費建議方案查找不足

自去年政府建議開徵膠袋稅開始，塑料袋被鎖定為環境污染物。由政府去年撥款綠色團體大搞無膠袋活動，中期的顧問研究，至今年五月二十八日向立法會提交徵收膠袋收費建議方案，一一揭示了政府的塑膠袋政策，無論就政策規劃的初衷，抑或實際執行環節，都暴露出這是一個思慮欠周詳的政策。政府亦為收膠袋稅而不惜歪曲事實和誇大塑料袋使用量。

首先，環保署香港固體廢物監察報告: 2004 年的統計數字指“香港每日產生超過 1000 公噸膠袋垃圾”。但根據財政司司長唐英年先生發表的 2005 至 06 年度財政預算案顯示，香港每天產生 3300 萬個¹膠袋，而每個膠袋重 4 克的話，每天的使用量才是 132 噸，和環保署的 1007 公噸相差甚遠。再加上政府統計署資料顯示 2005 年香港淨進口的聚乙烯膠袋（貨品編碼 3923 2110）產品每天只有 130 公噸。可見環保署有誇大塑料袋使用量之嫌。

另外，無膠袋活動更是數字造勢活動，無膠袋活動呼籲減用膠袋自備購物袋，那只是把塑膠袋用量完全轉移到其他更不環保的包裝物料上，如紙類，不織布袋(即塑料袋)，間接鼓勵砍伐森林和使用重型塑料袋，是一項「假環保」活動。對於台灣膠袋稅的負面例子，環保團體亦曾於公開論壇上承認，但卻仍堅持膠袋收費的環保成效。

政府顧問研究顯示了政府開徵膠袋稅是對著「收費」幹的目的。去年 9 月，政府委託顧問研究開徵膠袋稅，在諮詢業界意見的問卷中，從未有就膠袋稅的可行性來諮詢業界意見，整個諮詢只問業界的贊同那種收費方式，顯然政府注重的是膠袋稅收多少、怎樣收，而非膠袋稅是否對環保有幫助。

¹ 香港特別行政區政府, 2005/06 年度財政預算案, 第 75 節

政府提交徵收膠袋收費建議方案內容第四點以台灣與愛爾蘭首年膠袋派出量降低 90%及 80%作支持膠袋稅數據，而沒有交待兩地最新資料。兩地失敗的資料為去年 5 月台灣小吃店解禁限塑政策；愛爾蘭膠袋稅誘使使用更多紙袋、因膠袋稅成效不理想而於今年 7 月決定上調膠袋收費等資料，政府完全沒有提，可見推行政策查找不足。政府未能將膠袋稅對環保之成效向公眾全面交待，讓市民誤以為膠袋數量減少就能做到環保。

台灣: 膠袋稅導致膠袋垃圾總量增加

在台灣，自從民進黨執政後實施膠袋稅以來，數萬塑膠袋業從業員面臨失業，塑膠袋垃圾既沒有減少，而每年的塑膠袋垃圾更由 5000 萬公噸增加至 9000 萬公噸，當地更有 60%塑料由外地進口。台灣正是一個環保與經濟都雙輸的政策。因此台灣小吃店於去年 5 月起解禁政策。

膠袋稅的失敗是注定的，因它違反了經濟定律，某些自以為環保的人士直覺上想以簡單的價格與供求關係，以為徵收膠袋稅、使膠袋再不是免費便可以減少膠袋垃圾，殊不知正因為膠袋是免費不值錢的，才沒有人故意收集積存，做成浪費，亦無人要求膠袋造得更韌更厚，使之值回票價，所以膠袋製造商會盡可能將膠袋愈造愈薄，以節省成本，減少物料之浪費，省卻地球很多資源。

徵收膠袋稅則人為地扭曲了這原本各取所需、極具成本效益的市場經濟結構。膠袋要收費，膠袋雖會因價格與供求關係，在徵費的環節裏需求的個數減少了，但同樣地亦因價格與需求的關係市民會要求膠袋造得更厚更耐用，如穿了更會下次再回到商店要求更換膠袋，商店為求滿足顧客和避免膠袋質量被投訴，都會要求生產商增加膠袋厚度和密度以達至法律所定之極限，膠袋製造商將被迫將膠袋愈造愈厚，但因很多時候膠袋用一次便髒了，原本薄薄地便夠，但在價格與供求關係下，商店所給予的五毫子膠袋都變成結實和美觀的，於是不知不覺間增加了塑膠物料之浪費。

在台灣民進黨的政策是向所有售貨環節全面徵收膠袋稅，如香港是按綠色學生聯會（綠聯會 www.gsc.org.hk）所建議之只收『乾貨』，不收『濕貨』，情況將會更加嚴重，因市民可事先向相熟之街市『濕貨』檔主或麵包店、海味店等免費索取多些膠袋才去超市購物，因人性通常會索取比預期多之免費膠袋，索取後又用剩的膠袋便會做成浪費，這便是上文所述因膠袋有價會誘使人收集積存，因而未能物盡其用，做成浪費的例子。因此預期香港只向『乾貨』徵收膠袋稅所增加之膠袋垃圾總量會比台灣的更嚴重，政策更失敗。

愛爾蘭: 膠袋稅誘使使用更多紙袋

所謂成功例子，愛爾蘭為例，膠袋稅順理成章令超市所派發的膠袋 數量減少，但另一邊廂，用來圍垃圾桶邊的垃圾袋銷量卻直線上升 1000% 。諷刺是根據 The British Retail Consortium 調查指出，愛爾蘭的總膠袋用量經兩者互相抵銷後，根本沒有減低。由於膠袋徵稅，愛爾蘭的商舖士多，都預備一堆紙袋，希望沒有帶購物袋的顧客可以逃過一劫。其實 1 噸膠袋有 105,560 個，而 1 噸紙袋只有 18,000 個。差 6 倍 之多！加上製造紙袋所須的能量比製造膠袋高出 40%，比較兩者之間的價格差別已可推斷出來。貨車爲了運送紙袋，令愛爾蘭的商舖區交通比以前繁忙了 4 倍，塞車和送貨所耗用的油和經濟損失，不知特區政府有否考慮過因爲減少膠袋數量而造成更嚴重的環境污染問題呢？

愛爾蘭之膠袋稅造就了紙張浪費的副作用，而香港則於政府與綠色團體的大力宣傳下，令環保袋，如不織布袋、紙袋等泛濫。膠袋稅除了對環保毫無幫助、反而有害外，社會更要付出沈重的經濟代價。

應深入研究環保建議 免作錯誤決定

政府漠視膠袋稅失敗的實證，仍舊硬銷膠袋稅，對此我們實在深感遺憾。台灣與愛爾蘭是極佳的負面例子，兩地在徵收膠袋稅後，膠袋垃圾總重量亦因此不跌反升，膠袋稅也令當地更加浪費塑膠，做成『大躍進』式的生態大災難。可惜，前車可鑑，政府仍一意孤行開徵膠袋稅。

我們強烈反對政府單一向膠袋徵收環保稅。首先塑料袋是最環保包裝物，不應杜絕。我們明白減少廢物亦是環保的大趨勢，但全面減廢亦要公平，既然塑成袋既環保又耐用，開徵稅收又帶來更大的生態污染，爲何政府還要向最環保的包裝物料收膠袋稅呢？同時，政府一直都沒有一個清晰的指引，亦沒有落實任何方案去推行環保與回收工作，現階段只知稅項直入庫房。我們希望政府向公眾交待詳情。香港實在不應重蹈其覆轍，我們盼望個別環保組織提出環保建議前亦應多做深入研究，以免誤導市民大眾作出錯誤決定。



國外實證

開徵膠袋稅，弄巧成拙

世界各地有關膠袋稅的實例可見，開徵膠袋收費未能成效，更不被多國接受。

1.蘇格蘭：膠袋稅物不所值

2006年9月蘇格蘭環境及鄉郊發展委員會建議不可徵收膠袋稅(附註1a)，當地本實行膠袋稅的，但經考量，當地環境保護委員會亦表決不應立法徵收膠袋稅。因為徵收膠袋稅對減廢和保護環境工作沒有正面的幫助，而且動用的行政費遠超過環保成效，物不所值。同年10月25日蘇格蘭政府撤銷徵收膠袋稅建議。(附註1b)

2.澳洲生產力委員會：減廢目標適得其反

2006年5月澳洲報章(THE AGE/附註2)報導，澳洲政府屬下的生產力委員會(Productivity Commission)最新的一項報告指，在沒有充分的成本效益分析(Cost-benefit analysis)前，政府不應在2008年底實行禁止使用膠袋措施，且認為加強打擊亂拋垃圾會更有效控制膠袋所造成之環境污染。報告指出，隨地亂拋的垃圾中，膠袋為數少於2%，而膠袋只佔堆填區的0.2%，且膠袋對堆填區有穩固的作用。

委員會主席 Philip Weickhardt 指出，禁絕超市膠袋可能會導致更多人改用更大更重的垃圾袋，這使減廢目標適得其反。報告又質疑所謂膠袋會影響海洋生態之說，至今仍未有論證指膠袋為直接元兇。

3.澳洲：禁用膠袋帶來的更嚴重的環境問題

2006年9月22日澳洲報章(The Australian/ 附註3)指出，據當地政府一份獨立調查報告顯示，禁用膠袋後對環境的損害比繼續使用膠袋高，而且會帶來的更嚴重的環境問題。

4. 澳洲環境部部長：耗用資源遠超4倍

2006年8月澳洲環境部部長(Ian Campbell)親筆回應業界有關膠袋稅的問題，他表示不應開徵膠袋稅，亦不會禁用膠袋，因為禁用膠袋所耗用資源比對環境造成的損害遠超4倍。因為澳洲政府認為該國在2002年所推行的減廢措施十分奏效，故無需立法或採取收稅模式減少膠袋用量。(附註4)。

5. 德國：禁用膠袋對環境損害更大

2004年德國GVM (Gesellschaft für Verpackungsmarktforschung)研究得出，禁用膠袋用改用其他包裝物料，廢物數量、體積、能源消耗、溫室氣體排放量和運輸物流等的成本也會相應大增，對環境損害會更大。(附註5)

6. 愛爾蘭：開徵膠袋稅弄巧成拙

愛爾蘭早前開徵膠袋稅弄巧成拙(附註6)，雖然購物膠袋減少了九成，但是垃圾膠袋數量卻大幅增加。愛爾蘭自2002年實施膠袋稅之後，經過數年的政策實施後，整體塑膠用量勁升30% (2004年比2003年)，單一徵收膠袋稅對環保並沒有任何幫助。措施實行後，膠袋入口更勁升19%(2005年比2004)。因稅收未可達到環保成效，更於今年7月決定上調膠袋收費。

7. 台灣：塑膠袋總用量暴增一倍以上

在台灣，自從民進黨執政後實施膠袋稅以來，數萬塑膠袋業從業員面臨失業，塑膠袋垃圾既沒有減少，而每年的塑膠袋垃圾更由5000萬公噸增加至9000萬公噸，當地更有60%塑料由外地進口。台灣正是一個環保與經濟都雙輸的政策。因此台灣小吃店於去年5月起解禁政策。

(附註 1a) 蘇格蘭環境及鄉郊發展委員會建議不可徵收膠袋稅

議會報告網址:

<http://www.scottish.parliament.uk/business/committees/environment/reports-06/rar06-12.htm>

議會報告節錄:

The final conclusion reached by the 9 Members of Scottish Parliament, composing of 4 Labour party members, 2 Scottish National Party members, 1 Liberal Democrat, 1 Conservative and 1 Green party member was reached UNANIMOUSLY by the committee and states:-

"19. The Committee reiterates its support for the Bill's stated objectives. To achieve these objectives, the Committee urges the Executive to include ambitious measures to address plastic bag use in its waste prevention strategy. The Committee is not persuaded that the levy as currently proposed in this Bill is an effective means to achieve these objectives. The Committee, therefore, recommends that the Parliament does not agree to the general principles of the Bill."

To put this into perspective, it is clear that **ALL** political parties agree that a tax on plastic bags, for that is what was proposed, is not considered an intelligent response to what is perceived to be a problem.

(附註 1b)

THE GOOD NEWS FROM SCOTLAND TODAY

Plastic bag tax plan abandoned but retailers are told to cut use

DOUGLAS FRASER
douglas.fraser@theherald.co.uk

PLANS to tax plastic bags were yesterday abandoned at Holyrood, although the Environment Minister warned retailers that if they do not reduce giveaway bag numbers, they could face future legislation.

Mike Pringle, the Liberal Democrat MSP for Edinburgh South, dropped his members' bill, having faced opposition from retailers and lacking support among fellow MSPs.

He said he had, however, raised the profile of the environmental damage caused by bags, proposing an "environmental levy" similar to one which already operates in Ireland.

Ross Finnie, the Environment Minister, welcomed the move. However, he warned that if retailers do not sign up to a voluntary code of conduct - which in Australia has reduced the number of bags used by 45% - a law would be reconsidered.

He said that during the bill's consideration by MSPs,

various action on plastic bags had been taken by retailers including Tesco, Asda, Sainsbury's, Ikea, B&Q, Lidl and Dixons.

A waste prevention plan is to be published by the end of the year, along with Britain-wide targets for reducing bag use.

"I would strongly urge retailers to sign up to the voluntary code and I'd expect to see progress shortly," said Mr Finnie. "If agreement cannot be reached, then legislation may have to be considered."

"THE HERALD"
25/10/06

Don't ban the bag: report

By NASSIM KHADEM

RETAILERS and governments should abandon plans to phase out plastic shopping bags by 2008, according to a Productivity Commission report.

The independent advisory body on policy and regulation has presented its report on waste management, saying while more Australians are recycling than ever before, it can be a costly and ineffective method of reducing waste.

The report said that in 2002-03, Australians generated 32.4 million tonnes of waste, with 15 million tonnes of it recovered for recycling. In Victoria, waste recovered through recycling increased from about 40 per cent in 1994-95 to 51 per cent in 2002-03.

A number of states, including Victoria, have developed "zero waste to landfill" policies — encouraging waste reduction and recycling — which in theory aim to stop waste being dumped in landfills. The State Government wants 65 per cent of all municipal waste and 80 per cent of all commercial and industrial waste diverted from landfill by 2014.

But the report said that "zero waste" policies were almost impossible to achieve.

Governments are working with retailers to phase out single-use plastic bags by the end of 2008, but the report recommends they scrap the plan until a cost-benefit analysis is carried out.

Presiding commissioner Philip Weickhardt said the reduction in plastic shopping bags had simply resulted in more

Australians buying large rubbish bin bags. "Before you ban them, you need to think carefully about whether there are cheaper options," he said. "This appears to be a heavy-handed approach."

The report also calls on state governments to scrap levies on landfills. Victorians pay the \$7-a-tonne levy through their rates. The report says that while waste disposal results in pollution, it could be reduced to very low levels through "appropriate regulation" rather than landfill levies.

The report also questions whether local councils are best placed to manage domestic waste collection, suggesting regional bodies — similar to those regulating water and sewerage — be established to deal with the problem.

THE AGE 23/5/06

澳洲政府屬下的生產力委員會(Productivity Commission)最新的一項報告指，在沒有充分的成本效益分析(Cost-benefit analysis)前，政府不應在 2008 年底實行禁止使用膠袋措施，且認為加強打擊亂拋垃圾會更有效控制膠袋所造成之環境污染。報告指出，隨地亂拋的垃圾中，膠袋為數少於 2%，而膠袋只佔堆填區的 0.2%，且膠袋對堆填區有穩固的作用。

委員會主席 Peter Weickhardt 指出，禁絕超市膠袋可能會導致更多人改用更大更重的垃圾袋，這使減廢目標適得其反。報告又質疑所謂膠袋會影響海洋生態之說，至今仍未有論證指膠袋為直接元兇。

高造成多 4 倍之損害

THE AUSTRALIAN FRIDAY SEPTEMBER 22 2006

6 THE NATION

Ban on plastic bags 'not worth the cost'

Matthew Warren

THE cost of banning plastic bags is about four times higher than the environmental harm they cause, according to an independent report handed to the Victorian Government before it announced a bag tax in July.

Slower checkouts and retraining of retail staff could cost more than \$1 billion over the next 10 years, which would be only partially offset by the environmental benefit of removing plastic bags from the litter stream.

The findings followed a warning by the Productivity Commission in May that bans on plastic bags should not proceed unless supported by "transparent cost-benefit analysis", suggesting tougher anti-litter laws and greater community participation as possible alternatives.

Despite both these warning signs, the Bracks Government

announced in July a ban on free plastic bags from large supermarkets, with most bags attracting a mandatory 10c levy from 2009.

At the time, it was reported the move could be the catalyst for a nationwide ban, with NSW and South Australia already considering similar measures despite research suggesting the costs outweigh the benefits.

The Allen Consulting cost-benefit report of nine phase-out strategies to the Environment Protection and Heritage Council in May estimated a cost of between \$650 million and \$1.3 billion between last year and 2016. Victorian Environment Minister John Thwaites is a member of the EPHC.

The report then allocated an environmental cost of \$1 for each of the 40-60 million bags that become litter each year based on the value of volunteers' time to

clean them up — but then admitted this value was probably "generous".

Taking all these factors into account, the net cost of phasing out plastic bags in Australia would be between \$45 million and \$85 million each year. This was the result of the relatively high cost of a widespread or total ban in order to cut the relatively high litter and environmental impact of a relatively small proportion of bags.

Plastic bags make up less than 1 per cent of domestic waste in Australia. They are estimated to be about 2 per cent of total litter in the country.

An Environment Australia report on plastic bags in 2002 estimated that the cost of cleaning up littered plastic bags was about \$4 million a year.

The impact of plastic bags is considered to be higher than many other litter items because

of their persistence in the environment and capacity to injure wildlife, particularly in marine environments.

A spokesman for Mr Thwaites said last night the strategy applied in Victoria was not specifically included in the EPHC report.

The plastics industry said last night the report demonstrated a levy on plastic bags would not address the problem with litter.

Plastics and Chemicals Industries Association chief executive Michael Catchpole said that in all scenarios modelled the economic costs exceed the environmental benefits "by substantial margins".

"Litter is — and always has been — the issue that business, government and the community needs to address when considering the uses for and value of lightweight plastic bags," Mr Catchpole said.

(附註 4) 澳洲環境及文化部部长 Ian Campbell 於 2006 年 8 月就業

界查詢澳洲使用膠袋情況的回覆



SENATOR THE HON IAN CAMPBELL
Minister for the Environment and Heritage
Senator for Western Australia

10 AUG 2006

Mr J Neil Young
Managing Director
Simpac Ltd
Neil.Young@Simpac.co.uk

Dear Mr Young

Thank you for your email of 26 May 2006 concerning recent developments regarding plastic shopping bags in Scotland, Ireland and other countries.

You may be interested to know that Australia has adopted a more cautious approach to this issue than has been the case in Ireland and other countries. The focus of our efforts to date has been on voluntary action to reduce the impact of plastic bags on the environment. This approach has yielded outstanding results in a relatively short period. As you indicate in your letter, major supermarkets have reported using 45 per cent fewer bags than they did in 2002. A large proportion of the bags used now are the more efficient, reusable bags. In total, three billion single use plastic bags have been taken out of circulation since 2002, without recourse to regulation.

However, as a significant number of plastic bags are still entering the environment as litter, the Environment Protection and Heritage Council recently reaffirmed its resolve to phase out plastic bags by the end of 2008. The means by which this phase-out will be achieved are still to be determined, but it could include voluntary, co-regulatory or regulatory measures. I have made clear the opposition of the Australian Government to the imposition of a tax on plastic bags.

I am aware that plastic bags have a number of positive uses and are valued by many consumers for their usefulness as a cheap, efficient and hygienic means of transporting goods. I also acknowledge that many consumers value them for secondary purposes, including their use as bin liners.

Biodegradable bags may provide a solution to the environmental problems associated with the lightweight bags remaining in use whilst still providing an appropriate hygienic means of waste disposal. The Government is therefore working with the plastics industry, retailers and Standards Australia to develop Australian Standards for a range of degradable plastics. I understand that a suite of Australian Standards for biodegradable plastic should be available soon. Further information on these standards can be found at: www.standards.org.au. I have also provided \$40,000 to the Plastics and Chemicals Industries Association to develop a 'national guide and commitment' to assist in the introduction of biodegradable plastics in Australia.

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In your letter you refer to the recent draft report on waste generation and resource efficiency issued by the Productivity Commission. Although the Commission has so far only issued a draft report, and the Australian Government is yet to formally respond, I agree that transparent cost-benefit analysis is highly desirable. For this reason, the Environment Protection and Heritage Council will soon be releasing a cost-benefit analysis of various options for reducing the impact of plastic shopping bags for public consultation. You may find this document of interest when it is released.

You also referred to reusable bags. As you point out, the most popular alternative to single use high density polyethylene bags has been the 'green' polypropylene bag. From the resource use perspective, it might interest you to note that these have been found to be better for the environment on a lifecycle basis than the single use lightweight bags, provided they are reused several times before disposal. Further information on this analysis is available at the following website: <http://www.deh.gov.au/settlements/publications/waste/degradables/impact/index.html>.

Thank you for taking the trouble to write. I will ensure that the information you have provided about developments overseas is passed to the appropriate area in my Department.

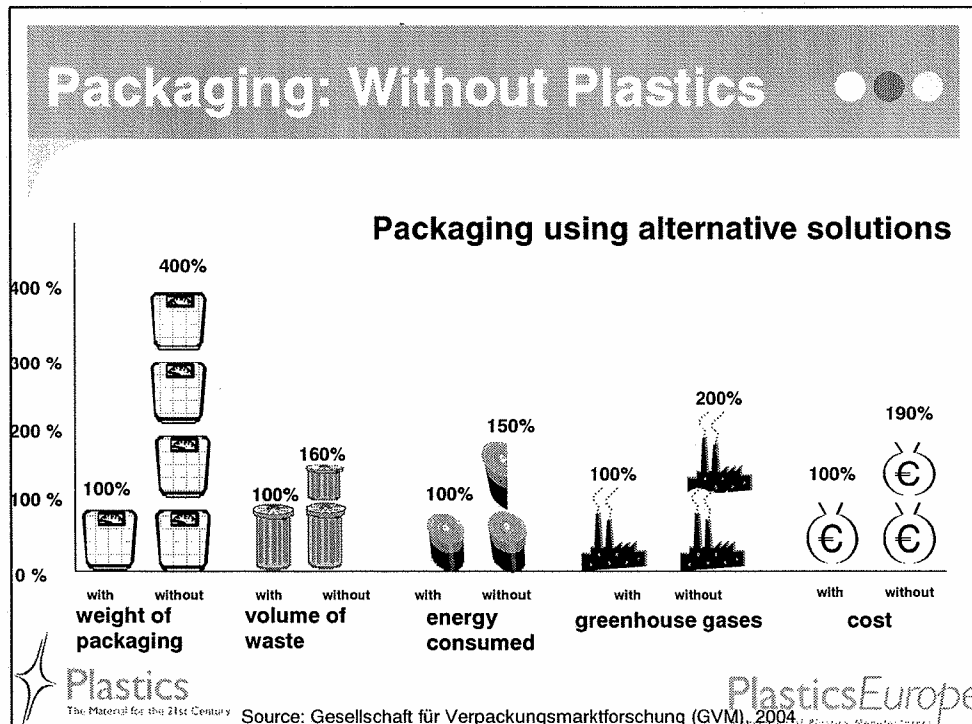
Yours sincerely

IAN CAMPBELL

(附註 5)

2004 年德國 GVM(Gesellschaft für Verpackungsmarktforschung)

研究



禁用膠袋改用其他包裝物料，對環境損害更大。包裝品的重量會增加 3 倍、家庭廢物中。包裝品的體積也增加 60%、能源消耗將再增加 50%、溫室氣體排放和運輸物流等的成本也會相應大增。

(附註 6) 在蘇格蘭及愛爾蘭 **Eire** 地區均設有店舖的商戶，在使用膠袋

及紙袋對重量、體積及價格上的比較：

IRISH FACTS²

Retailers	Scotland		Eire		Weight		Bulk		Cost	
	Wt/1000/Kg		Wt / 1000 /Kg		Multiplier		Multiplier		Multiplier	
	Plastic		Paper							
Boots	Small	2.52	13.13	5.2	7.5	5				
	Large	7.0	36.12	5.6	15.7	7				
Next	Plc Small	13.52	66.67	4.9	11.2	7				
	Medium	26.51	96.98	3.7	11.6	7				
	Large	43.71	138.55	3.2	11.1	7				
Miss Selfridge	Small	2.75	29.61	10.7	7.2	12				
	Medium	12.91	65.26	5.5	4.7	6				
	Large	23.01	108.80	4.6	4.3	4				
TopShop	Medium	14.16	62.1	4.4	13.0	12				
	Large	20.67	89.3	4.3	3.9	4				
Burton	Small	4.56	43.53	7.6	17.8	13				
	Large	35.72	104.82	2.9	3.4	5				
Fresh fruit										
4 apples	1.8	8.11	4.5	at least 15	?					
5 bananas	1.8	19.86	11.0	at least 20	?					
600 gr potatoes	1.8	23.81	13.2	at least 20	?					
loose potatoes	1.8	17.7	9.8	14	10					

² YOUNG, Neil; 2006, Simpac Ltd, Glasgow, UK.

1 x 20 ft container

		Scotland	Eire	Bulk	Cost
		# of bags	# of bags	Multiplier	Multipiler
Tesco carriers	POLYTHENE	1,900,000			
	Woven Polypropylene		25,000	76	70
Quinns	Polythene carriers	1,900,000			
	green nonwoven polypropylene		32,800	58	32
Topshop	Polythene carriers	1,100,000			
	Nonwoven polypropylene		30,000	36	12

愛爾蘭自 2002 年實施膠袋稅之後，首年膠袋使用量大跌九成。但經過數年的政策實施後，愛爾蘭的整體塑膠用量 2004 年和 2003 年相比，勁升 30%，原因是愛爾蘭人改用免稅垃圾袋、食物袋、紙袋、發泡膠或硬膠盛載器皿來代替塑膠手挽袋。從這看出單一徵收膠袋稅對環保並沒有任何幫助。

據了解，由於市民使用膠袋的習慣沒有根本性的改變，2005 年比 2004 年膠袋入口更勁升 19%。愛爾蘭政府見稅收未見成效，現在更考慮把稅率加倍，相信此舉更令愛爾蘭人改用更多更重更不環保的塑膠代用物品。

從可以看出，同一容量的膠袋遠比紙袋更輕、更省儲存空間及價格更為廉宜。

環保建議

● 選用較環保塑料:

由於市場(包括政府)採購以價為先，政府應資助、鼓勵使用環保塑料產品，現在我們面對“有貨有市”的情況。塑料袋本身是環保的包裝物品，而革新科技下的塑料袋工業已向環保科技出發，同業於環保考量的問題上，由機器、膠粒原料、膠袋產品、添加劑選擇、循環生產和回收再造等問題著手，將科技與環保兩者間取得平衡達到環保。因此政府應教育市民，並帶頭使用環保包裝物料。

● 政府應支持回收工作:

要做好環保，完善的回收工作是重要的一環。由政府做起，收集各部門、診所、馬會等膠袋垃圾，由同業回收再造成再生塑料產品，以優惠價予政府回購，達善用資源之效。(如再造紙)

現國外已有零售商如日本，已主動與回收商合作，向顧客收取一次性的膠袋費作購買質料較佳的購物膠袋，市民可重複使用該膠袋，若破損則將膠袋予商店，免費再換一個新膠袋，而舊膠袋則予直接給予合作回收商循環再造。

- 好處:
1. 市民減少膠袋費開支，減少擾民情況。
 2. 回收工作由零售商層面出發，回收膠袋要由他們協助，令膠袋盡用，並確保膠袋能「一條龍」回收再造。
 3. 市民參與可直接教育市民 "3R" 環保知識 -----Reduction(減量)、Reuse(重複使用)、Recycling(回收)、Regeneration(再生)

● 推廣「自備環保袋」包括膠袋，鼓勵製造優質的環保膠袋:

由政府訂立優質標準，讓膠袋更耐用。

● 訂立減少膠袋使用量的目標，設立獎勵制度，讓大眾達標，

那比懲罰性收費更有效更省資源。