



CB(1) 837/07-08(03)

「膠袋收費計劃」 意見書

香港塑料袋業廠商會

2008年2月23日

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Hong Kong Plastic Bags Manufacturers' Association

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一、 立場

爲了真正的環保，爲了迎接未來的綠色生活，我們塑料袋行業絕對支持有效的環保方案，但到目前爲止，由政府委託 GHK 公司進行的顧問研究，由外國膠袋稅失敗的實證，我們仍看不到，塑膠購物袋收費計劃的可行性。我們只希望各議員能細心閱讀那份由環保署聘用顧問公司所做的研究報告，議員若仍支持立法，我們也盼政府能搞好回收工作，選用優質環保塑料袋。因我們相信若回收做得好，那怎會再有膠袋出現在於堆填區中？

二、 實況

(i) 顧問研究報告不讚成塑膠購物袋收費計劃

作爲《條例草案》內首個生產者責任計劃，塑膠購物袋環保徵費旨在解決本港濫用塑膠購物袋的問題，可惜連環保署 2005 年委託 GHK 公司進行顧問研究亦不主張徵收膠袋費，如今卻強要將條例推出，業界質疑政府是次做法，本會更希望各議員在討論是次條例草案前，必先細心閱讀那份由環保署聘用顧問公司所做的研究報告。長達 97 頁的報告內容中，顧問研究不讚成以塑膠購物袋收費計劃，環保署 2005 年委託 GHK 公司進行顧問研究，評估塑膠購物袋收費計劃的益處和影響。GHK 研究了「自願參與計劃」、「供應商徵費及顧客徵費方案」、「在所有零售商店向顧客收費」、「在指定零售商店向顧客收費」四個方案的可行性。報告認爲自願參與計劃最可取，相反其餘三個徵費方案，都會導致商店使用紙袋等「替代品」，最後導致垃圾總量增加，「減少使用膠袋未必會對環保有正面影響」。那麼我們不明白今天爲什麼還要花大量人力物力去將推出一個對環保未必有正面影響的《條例草案》？我們更質疑爲什麼沒有考慮顧問公司進行的研究結果----- 建議政府採用「自願參與計劃」取代強制徵費？

(ii) 七成民意支持的可信性

膠袋收費公眾諮詢於去年 9 月完結，而該顧問報告已於同年 5 月完成，當時正是膠袋費的公眾諮詢期，但政府沒有即時公開報告內容，封殺顧問建議，並以「七成民意支持」的理據，令膠袋收費勢在必行。政府沒有即時公開報告內容，直至去年 9 月諮詢期完結，民意「大局已定」，才「低調地」向立法會發放有關資料。利益全歸於政府是次推行《條例草案》。而這個報告爲什麼沒有被官方如實繙譯爲中文，原因不明。開徵膠袋稅原意是爲了環保，可是得出來的結果卻是如此不環保，令市民用得更多物料，直接危害環境。如果市民認知是次報告，那麼，市民又會否天真地以爲環保徵費能解決本港塑膠購物袋的問題？

(iii) 回收工作支援不足

膠袋回收和循環再造仍然支援不足，本港仍沒有足夠的塑膠回收網絡，其實原料價格不斷上升，再生膠料價值亦上揚，可是沒有一個系統可以有效地善用地球資源，將寶貴的膠料循環再造，我們生產商亦光見寶貴的膠料傾倒到堆填區，深感無奈。

(iv)收費太高

一個成本低至幾仙的膠袋，政府徵稅五毫，傳媒知識分子會說是徵得「合理」、「越早實施越好」，但我們作為生產商感到非常嘩然，政府的收費遠超過成本價的500%，試問有那種稅收的百分比給此驚人。受到膠袋稅以及現今各地人士加強對環保意識的影響下，導致同業訂單減少。而原料價格、工資等成本上調，若再加上膠袋稅實施，6月1日國內國務院限制塑料購物袋政策實行，同業將面對雪上加霜的經營局面。而眼見若膠袋收費實行，政府那樣無本生利的行動，收入遠超艱辛經營的同業，同時只懂打壓工業，我們深感難過。

三、 建議

(i)落實支援業界生產綠色塑料袋

業界形象因為是次推行《條例草案》而大受損害，速請環保署協助同業發展綠色生產，或資助業界、回收商等加快回收系統的進程。現在，我們面對塑料價格不斷上揚，再造膠料的價值亦相應提高，可惜對於這些再生原料，一直求過於供，作為製造商，我們都希望選用較環保的材料。但基於本港不健全的回收系統，我們想環保也做不到。既然政府庫房有盈餘，為何仍要從市民的口袋裡賺取暴利？何不還富於民，還富於環保？既然回收塑料市場淡靜，政府何不增添回收車隊，將有用可回收的資源由市民手中取回，還資源循環再用？

塑成袋業一直希望走向綠色工業的角度，可惜政府一直對同業沒有直接的支援，盼政府若實行環保稅項，亦應同時承諾協助受影響的業界發展環保工業。

(ii)加快環保塑料袋生產度

選用較環保塑料，目前最方便的環保塑料購物袋為可完全降解的塑料袋。從20世紀90年代就開展了這方面的研究，目前已陸續開發出四代產品，一代更比一代好，而且可完全降解的塑料袋均可回收再造。

本會亦希望市場採購不要以價為先，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。

(iii)落實完善的回收系統

由政府建立回收系統，確保收集膠袋源頭的穩定性，由同業回收再造成再生塑料產品，達善用資源之效。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。

(iv)訂立減少膠袋使用量的目標

如顧問公司進行的研究結果----- 建議政府採用「自願參與計劃」取代強制徵費，可配合回收計劃，令香港市民一起達致減費目標。我們亦提議政府以按金制度去代替徵收膠袋稅，市民只要付一次按金購買優質加厚的塑料購物袋，便可以重覆使用該塑料購物袋，到塑料購物袋破損，便到商店換取一個新的，而回收的塑料購物袋亦會直接給予回收再造，那不是對市民，尤其對基層市民的影響最小嗎？而該塑料購物袋因為有價值，相信亦會誘使市民回收。

四、 結論

業界支持環保，但我們真心希望環保不是只搞一些毫無作用、甚至危害環境的措施，搞搞噱頭、亂指元兇，更影響市民的日常生活，值得嗎？政府於委託顧問公司做了一個只有英文版本、名為「評估塑膠購物袋徵費措施的好處和影響」的研究報告，我們質疑政府是否有參考箇中意見？如真實行膠袋收費，我們亦盼政府能開拓更多資源協助受影響的業界。亦要加強回收工作，不可只懂盲目收稅。

香港塑料袋業廠商會

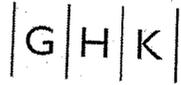
常務副會長 黃維基

2008年2月23日

The Benefits and Effects of the Plastic Shopping Bag Charging Scheme

Executive Summary

May 2007



In the absence of clear evidence on the net environmental benefits of any of the charging schemes, the consultants suggest that the Government continue with its voluntary initiative but invest further resources in actively promoting and managing it to increase participation and harness the strength of stakeholder goodwill identified during the view-seeking exercise.

The international evidence suggests that the largest reductions in bag use can be made by directly targeting customers, though this could also lead to the greatest unintended consequences if the schemes are not carefully designed and tested beforehand.

However, reducing the use of plastic shopping bags does not automatically confer environmental benefits since consumers still require a means to transport their goods home and alternative bag types are not necessarily any better for the environment, despite widespread public opinion to the contrary. Paper bags are heavier and bulkier than plastic bags and thus require more resources in transportation and take up more space at landfill. They also entail greater water consumption, greenhouse gas emission and eutrophication of water bodies during production. Likewise, biodegradable plastic bags create difficulties if mixed in with conventional plastic bags for recycling and upon disposal create landfill gas, leachate, decompose at a non-homogenous rate and may soon be banned from landfill altogether under future EPD plans. Even non-woven bags, which are commonly marketed as being 'environmental', are only more environmentally friendly if they are used at least as many times than as their relative increase in weight and bulk over conventional shopping bags. These bags also often include such features as metal eyelets which make them difficult to recycle. Reducing the indiscriminate use of plastic shopping bags therefore will only truly achieve environmental gains if switching to alternative bags distributed free at the point of sale is limited and consumers either reuse long term bags many times or use no bag at all.

However, reductions in plastic shopping bag use do not necessarily have positive environmental impacts. Plastic shopping bags account for less than 2% of Hong Kong waste sent to landfill and less by bulk. A reduction in indiscriminate plastic shopping bag use could therefore have only a very small positive effect on total waste but there is potential for negative overall impacts if implementing a charging scheme induces switching to heavier or bulkier alternatives that are similarly disposed. Indeed, bag bulk to landfill is anticipated to increase under all of the charging schemes, reflecting the impact of switching to alternatives.

The introduction of a plastic shopping bag charging scheme may provide a shock factor, thus raising environmental awareness, but such an outcome is not measurable and policy requires a stronger basis for justification. To engender support the Government would also need to reassure the public that funds are being used to further environmental objectives rather than just being subsumed into general Government revenues.

EPD does not publish waste disposal data by bulk, a more direct measure of landfill capacity, but indicative calculations based on the Landfill Survey suggest plastic shopping bags account for 352m³ per day or 0.45% of MSW by wet weight and just 107m³ per day or 0.14% of MSW by dry weight¹⁰. By comparison, a Carrefour supermarket chain study reports that a single paper bag produces 2.7 times as much solid waste as the equivalent plastic bag¹¹. This figure is supported by evidence from the California Environmental Protection Agency that reports the density of paper bags in the waste stream to be 3.1 times that of plastic trash bags¹². In other words, paper bags take up about three times as much space in a landfill as their equivalent weight in plastic.

However, reducing the use of plastic shopping bags does not automatically confer environmental benefits since consumers still require a means to transport their goods home and alternative bag types are not necessarily any better for the environment, despite widespread public opinion to the contrary. An independent review for the Carrefour supermarket chain in France used lifecycle analysis to trace the relative environmental impacts of a typical HDPE lightweight bag, a reusable LDPE bag and a paper bag from production to disposal. The study found paper bags to have a more severe environmental impact in seven out of the eight impact categories – the exception being risk of litter. Paper bags were found to be particularly harmful with respect to eutrophication of water bodies, water consumption, greenhouse gas emissions and production of solid waste¹⁵. Even non-woven bags, which are commonly marketed as being 'environmental', are only more environmentally friendly if they are used at least as many times than as their relative increase in weight and bulk over conventional shopping bags, and often include such features as metal eyelets which make them difficult to recycle.

These bags are then frequently reused with over 96% of respondents saying that they reuse plastic shopping bags in their daily lives. Of those that reuse the bags, 96% of respondents reuse them as refuse bags and 53% as shopping bags.

The potential impacts of a plastic shopping bag charging scheme are both wide ranging and complex. It is clear that charging for plastic shopping bags at the point of sale will reduce their consumption. However, any charging scheme needs to create the right incentive structure, through emphasizing the superior environmental outcome of "no bag or long term bag" rather than creating incentives for consumers and retailers to switch to heavier and bulkier alternatives.

Plastic shopping bags account for just an estimated 1.8% of the waste stream by wet weight and less by bulk. Any plastic bag charging scheme would therefore have little positive effect on the overall weight of waste to landfill but there is potential for negative impacts if heavier or bulkier alternatives are adopted and similarly disposed.

The overall potential impact of a charging scheme in Hong Kong is further constrained by the SAR's daily shopping habits, high prevalence of small independent retailers, fresh food culture and low car ownership. Since independent retailers account for some 59% of total bags disposed of at landfill, then any significant reduction in indiscriminate plastic shopping bag use will rely heavily on their participation and compliance.

Ultimately, to change consumer behaviour and reduce indiscriminate shopping bag use will require a change in public mindset, particularly in their attitude toward such environmental issues as waste and waste disposal. To that end, comprehensive marketing, improvements in education and awareness are pre-requisites for success.