



香港工程師學會

THE HONG KONG INSTITUTION OF ENGINEERS

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21 February 2008

Clerk to Bills Committee  
Legislative Council Secretariat  
3<sup>rd</sup> Floor, Citibank Tower  
3 Garden Road, Central  
Hong Kong

(Attn: Mrs Mary TANG)

Dear Mrs Tang,

**LegCo Bills Committee on Product Eco-responsibility Bill –  
Views on Product Eco-responsibility Bill**

Thank you for your letter of 25 January 2008 inviting the Institution to put forth our views on the captioned subject.

The Hong Kong Institution of Engineers (HKIE) shares the purpose of the Ordinance to minimise the environmental impact of waste products; however, we consider that the initial phase on imposing levy for plastic bags may not have significant impact on reducing plastic wastes as plastic bags only share a small portion of the plastic wastes.

HKIE had previously submitted collecting levy at retailing level is both scientifically incorrect and burdened with administrative onerous. A copy of our previous submission to the LegCo Panel on Environmental Affairs on “Proposal on an environmental levy on plastic shopping bags” dated 9 July 2007 is enclosed for the Committee’s ease of reference.

Where levy on plastic products must be enforced, we believe it would be more beneficial to extend the coverage to include bottles which account for a bigger portion of plastic wastes in terms of weight.

We also urge Government to consider the possibility of making use of levy thus collected to subsidise the recycling manufacturers to recycle the plastic bottles. In particular, consideration could be given in setting up funding schemes to support the development of the cost-effective solution in sorting, cleaning and recycling of plastic bottles to relatively pure plastic resin so as to reduce significant amount of plastic waste for landfill or incineration.

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Mrs Mary TANG

As to the other products under future consideration, we suggest the Administration to have a comprehensive list stating clear all electrical and electronic equipment that the producers should share the responsibility for the reduction in the use, and the recovery, recycling and proper disposal to facilitate the producers to have a clear understanding on the “producer responsibility schemes”.

Please also be informed that the HKIE will not have any representative in attending the Committee meeting on 23 February 2008.

Thank you.

Yours sincerely,



Ir Dr LO Wai Kwok MH JP  
President

Encl

**Enclosure**

**Legislative Council – Panel on Environmental Affairs**

**Summary of views from the Hong Kong Institution of Engineers  
on the proposal on an environmental levy on plastic shopping bags**

**General**

1. The Hong Kong Institution of Engineers (HKIE) refers to the Administration's proposal on an environmental levy on plastic shopping bags and the proposed phased approach of the scheme.
2. The HKIE is supportive of Government's initiative to reduce solid wastes through economic means and actions to stop "abuse" of plastic shopping bags. However, the following should be well considered in the design of this new initiative.

**The Proposal**

*The proposed phased approach*

3. We consider that the initial phase of imposing levy on shopping bags from chain or large supermarkets, convenience stores and personal health and beauty stores should be viewed as a pilot trial scheme only. According to the landfill survey of the Environmental Protection Department, these retailers make up less than 4% of our retail outlets. The initial phase of imposing levy on shopping bags from these outlets would not likely achieve a significant benefit for environmental protection. Moreover, the trial duration should not be too long to mislead the public that differential treatment on other plastic bags and kinds of solid wastes are to be given.

*The level of the levy*

4. We consider it is scientifically incorrect to apply the same environmental levy of 50 cents per bag irrespective of their sizes and weights.
5. We suggest that the levy be collected directly through plastic bag suppliers to the covered outlets based on the weight of plastic bags provided. The proposal to require "relevant retailers" to assist in the levy collection appears to give these retailers double discrimination in that they are singled out from the others to pay for the levy and that they have to provide the necessary additional administration expenses for levy collection. Our suggestion will make the levy more scientifically sound and administratively less onerous to these retailers. The retailers, who have already paid the suppliers the levy, have incentive to recover the cost from their customers. These outlets should also not be required to police if customers have snatched plastic bags by themselves for use out of convenience.

*Other recommendations*

6. We advise against improper message and education delivered to the public on the so-called “environmentally friendly” shopping bags which may give rise to possible environmental problems. The curb on plastic bag use may not necessarily induce reduction in solid wastes if people switched to use paper bags. Fabric bags, once become dirty may also be disposed without being reused hence may also constitute to solid wastes. Paper bags and fabric bags take much more energy for their production, therefore disposal of paper or other kinds of bags (such as used travel bags) may be more environmental unfriendly than that of plastic bags.

7. We recommend that proper message should be delivered to the public in future education programmes and Government should promote the use of reusable “environmentally friendly” plastic bags which are exempted from the environmental levy under the current proposal. The proposal by some people to exempt degradable plastic shopping bags from the environmental levy should not be ignored and merit further considerations, although we agree that the so claimed “degradable plastic bag” must be fully supplemented by scientific evidence. From the engineering and scientific point of view, no materials including plastics should be labeled as good or bad. The said key objective of the present Government proposal to reduce the indiscriminate use of plastic shopping bags is thus difficult to comprehend. The community can no longer afford to kill innovations to enable any commodities to be more environmental friendly. Plastic bags should not be banned simply because they are made of plastics.

8. We urge Government to provide incentive in the forms of reward and subsidy to promote attractive and environmentally green shopping bag for repeated use.