

Submission to the Bills Committee on the Product Eco-responsibility Bill

1. The Consumer Council (“CC”) is pleased to provide submission to the Bills Committee on the Product Eco-responsibility Bill (the “Bill”).
2. CC supports the introduction of producer responsibility schemes that impose shared responsibility by various parties to contribute to waste reduction, recovery, recycling and proper disposal. CC therefore welcomes the implementation of a legal framework to put such schemes into effect in Hong Kong.
3. At the present stage, only plastic shopping bags are specified to be regulated by the Bill. Plastic shopping bags account for only a small percentage (around 3%) in municipal waste. Despite the introduction of a levy on plastic shopping bags is expected to play a small part in waste reduction, the introduction of such a levy would demonstrate to the public and industries the determination of the Government to reduce waste. CC trusts that building on the experience of the plastic shopping bag levy, the Government will monitor implementation of the scheme and will expand the range of products to which the statutory framework applies in due course for a greater effect subject to feasibility studies and impact analysis to assess the impact on industries and the public.
4. The Bill imposes restrictions and duties on registered retailers regarding provision of plastic shopping bags, charging for them, filing of returns, payment levies and record keeping. These are onerous requirements which retailers are unlikely to subscribe to in the absence of incentives or obligations. However, section 19(3) of the Bill seems to suggest that registration as a registered retailer is voluntary. If that is the case, the Government may need to consider how to motivate retailers to register themselves to render the measures effective.
5. According to the Bill, a levy per plastic shopping bag is payable by a registered retailer to the Government. Whilst the proposed levy of 50 cents on each shopping bag seems acceptable, CC hopes that the registered retailers concerned, of considerable scale of business by definition set out in Schedule 4 of the Bill, will absorb the costs involved over and above the levy instead of passing them on to the consumers

directly. Moreover, there should be clear accountability of the levy collected and it should be seen to be invested on environmental education or waste reduction.

6. To rally mass support, territory-wide publicity and marketing initiatives, education campaigns and community awareness programmes are required to maintain the momentum to reduce waste.
7. Before the Bill is made to apply to prescribed products other than plastic shopping bags, resources can be invested to engage importers, retailers and industries to provide take-back facilities for their products or packaging, to enhance waste collection and easier waste recycling processes.
8. Moreover, to encourage more environmentally responsible behaviour, voluntary reduction practices can be encouraged and recognized as good practices, especially in the wet market and other business sectors, e.g. the reduction of multi-packaging (e.g. by mooncakes' manufacturers) and the use of single-variety materials which can be better recycled.
9. In public places, residential, business and industrial areas, the number and variety of waste collection bins can be increased wherever possible to encourage waste separation. In addition, waste management companies and waste collectors can be instructed to separate single-variety materials, not confined to plastics, for reprocessing so as to reduce the amount of materials to be landfilled.
10. CC will be happy to help in promoting community awareness of the relevant measures when the Bill comes to be implemented.

Consumer Council
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