

To: Hon. Audrey Eu
Chairman Panel on Environmental Affairs

Ref: CB1/PL/EA

C/O: Miss Mandy POON

From: Caritas Computer Recycle Projects*

Submission to Panel on Environmental Affairs. LEGCO, HKSAR 22 Feb.2010

Views regarding the new producer responsibility scheme for waste electrical and electronic equipment

Present Situation: (item 4 of the discussion paper)

We agree that we need to develop a local solution in the spirit of eco-responsibility to manage the waste electrical and electronic equipment (WEEE) problem. However, we would like to emphasize that increasing reuse of undamaged electrical and electronic equipment (EEE) is also an effective way of reducing WEEE.

Caritas was appointed to operate a government-funded Computer Recycle and Reuse Program from 2003 to 2007 and also funded by Education Bureau to refurbish approximated 12,000 sets of computers for the deprived student. From their joyful faces, we know that we are doing the right thing.

We are convinced that there is substantial demand for refurbished electronics and electrical goods from the low-income populations. From our experience, the social benefits of computer reuse projects outweigh the cost involved. We plead the LEGCO to support EEE reuse as it supports recycle.

Coverage: (7)

The proposed scheme recommends regulating 5 types of waste only. It is difficult for us to understand why Environment Protection Department (EPD) does not want to regulate other electrical items.

We suggest that all electrical and electronic equipment to be covered under this scheme. It should not be difficult for EPD to adopt a working definition, draw up a full list of all the electrical and electronic equipment, and update it from time to time.

Shared Responsibility (9)

We agree that new Waste Disposal Ordinance should ban disposal of all WEEE as trash and EEE consumers should include individuals, organizations and firms. However, the Government should also assure that door-to-door collections are available; with or without fee charging.

WEEE recycle fee (10)

Collecting a WEEE recycle fee from customers at purchase may not be a good idea. It is very difficult, if not impossible, to set an acceptable recycle fee at purchase that may match the cost of recycling a piece of equipment 7 years later.

The WEEE recycle fee, in essence, is another form of consumer tax, which may not be supported by general public.

WEEE recycle fee collection and management (11-14)

We believe that the consumers need to pay for recycle fee. However, the proposed fee collection system would induce huge administrative expense and monitoring costs.

Related Trade Responsibility (15)

We are of the view that the Government should follow the European Union standard to apply permit control over the import and export of all WEEE.

Licensing of WEEE handling (16)

We strongly support that transportation, storage, dismantling and recycling should be handled by licensed company with certified management, and trained and qualified green workers.

In view of the public's sentiment in protecting the countryside, we suggested that no more farmland should be allowed to be converted into recycle-related sites. The existing recycling plants should be gradually moved to the designated sites.

Local WEEE Process Capability (17)

We support the idea that Hong Kong needs to build up WEEE recycling capability. We understand that the WEEE collected from Hong Kong alone is not enough to support the set-up and operation of a profitable, safe and high tech recycle plants.

We are very disappointed about the lagging development of the Eco Park. The sponsored new initiatives were low-tech dismantling processing which main value is to create jobs for the deprived. Our recycle partners are not confident if the existing management of Eco Park could make major contribution to enhance WEEE recycling.

Mandatory Control (18)

We concur that mandatory control would increase demand for large scale of recycling service. However, we wonder how the Government could guarantee enough facilities were available to handle the demand after passing the regulation.

Other Options: (19)

The Government had supported a wide range of WEEE projects in the past few years. The Government should review all the funded recycle projects, before deciding to what extent the Government should fund and support the WEEE recycling services.

As a non profit-making organization that devoted to serve the deprived, we would like to emphasize refurbishing the discarded electrical and electronic equipment for the deprived for reuse should be included in the policy.

The success of WEEE recycle hinge on the support of the public and we suggest the Government to consider supporting social enterprise which may induce wider community support to running the related services.

To Conclude:

We support the EPD's proposal to strengthen the legal framework to clarify the responsibility of the parties concern in WEEE recycle although we have reservations to the limited scope of regulation and its fee collection system.

Our views can be summarized to 6 points:

- 1. EEE manufactures should make sure that their products are safe to recycle and recycle service is available.**
- 2. The wholesalers and retailers should provide timely and convenient collection service for the consumers.**
- 3. The consumers should not treat WEEE as trash and should dispose them through qualified people and pay if necessary.**
- 4. The company and workers who handle the recycle should be trained, certified and licensed.**
- 5. The leading role of the Government is the key of the success. In addition to the advice from professional and experienced entrepreneurs, the EPD should collaborate with a wide community network and engage organizations with passion and mission as partners for the development of the WEEE recycle service.**
- 6. Refurbish all undamaged EEE for reuse of the deprived should be encouraged.**

*This paper represents the views of the staff of the computer recycle services only.

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