



Presentation to LegCo Panel on Environmental Affairs
22 February, 2010

Consultation Document of a New Producer Responsibility Scheme for
Waste Electrical & Electronic Equipment

(by Mr. Ken Ng, Representative of HKRMA)

In response to the consultation document of the new Producer Responsibility Scheme for Waste Electrical & Electronic Equipment (WEEE) released by the Environment Bureau on 18 January, 2010, the Hong Kong Retail Management Association (HKRMA) has the following views:

- (a) The consultation paper is not neutral in context as it should be. In the paper, it is stated that “To enhance our collection system, we propose to require mandatory take-back by retailers free of charge on a ‘new for old’ basis.” (Paragraph 6.5). The proposal of “free of charge” take-back service would definitely skew public’s preference. The Association is very concerned since this biased recommendation is built on an unfair ground to retailers. It is also misleading to suggest that related take-back service is free.
- (b) The consultation paper lacks sufficient information about how the collected levy will be utilized.
- (c) The consultation paper lacks detailed information on the actual dismantling or recycling facilities required to detoxify harmful materials from WEEE. The Government should clearly explain the necessary skill sets and facilities to properly recycle WEEE and who or what parties currently possess these skill sets and facilities.