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HONG KONG
Suppliers Association **HKSA**

香港供應商協會有限公司

<http://www.hksuppliers.com.hk>

April 28, 2010

Environmental Protection Department
Waste Management Policy Group
Room 4522, 45th Floor, Revenue Tower
5 Gloucester Road
Hong Kong

Dear Sir,

Re: Response to Consultation Document of WEEE

Hong Kong Suppliers Association (HKSA) is of the opinion information provided in the Consultation Document on Waste Electrical & Electronic Equipment (WEEE) did not fully address the problem of WEEE. Furthermore, HKSA is of the opinion proposals stated in the Consultation Document would not solve the environmental problem caused by WEEE. Thus, HKSA chose not to respond to the questionnaire in the Consultation Paper because the questions so structured and asked would inevitably lead to "support" of the scheme that we honestly felt inadequate.

1. Aim (Purpose) of the Scheme

The Consultation Paper basically informed the public on the need to recycle WEEE that every citizen or company in Hong Kong will support. But, the purpose of the Scheme stated in Paragraph 3.3 in the Consultation Document is inadequate. The 5 aims as stated are general and did not address the environmental problem of WEEE. The most important aim, not mentioned in Paragraph 3.3, should be to ensure:

Under strict environmental control, WEEE will be dismantled, processed and recycled to reusable form ready to be reused as manufacturing material, thus, will not cause environmental problem locally or exporting the environmental problem elsewhere in the world.

Reading through the Consultation Document, we truly felt the Government does not have this aim in mind because no details was given on how and what would it takes financially to recycle the WEEE material.

2. Fee (levy)

The Consultation Document elaborated lengthy on a levy is to be charged on a "polluter pays" basis and how should such a levy be charged. Levy and how to collect it appears to be the focus of the Consultation Document. The suggested levy scheme is based on an unsounded logic by common and business senses:

The objective of "polluter pays" is to recover cost as stated in Paragraph 7.1. The Administration is to decide on a pre-determined levy amount (probably based on some assumption of collection/recycle cost and quantity to be collected) BUT companies (WEEE Management Contractor) from the private sector (presumably profit making entities) are to carry out the collection and recycle work of unknown quantity of WEEE. There is no logic in such thinking on a cost recovery basis on the part of the Government and a money making business on the part of the

P.O. Box No. 33692 Sheung Wan Post Office, Hong Kong
Tel: 25433316 Fax: 31863019 E-mail: contactus@hksuppliers.com.hk

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<http://www.hkrsuppliers.com.hk>

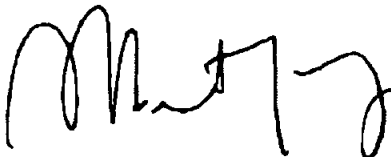
private WEEE Management Contractor producing an end result of the missing aim to ensure turning WEEE into ready to use recycled material.

HKSA strongly support a workable WEEE recycle program. With the information provided to us at this moment, we do not believe the proposal in the Consultation Paper is a workable WEEE recycle program. Before the Government asks the trade or the public to provide opinion on the WEEE Scheme, the Government should provide information on:


1. Economical feasibility of WEEE recycle facilities and commitment of Government financial support and form of support if not feasible by the private industry
2. Assurance that the recycle technology used will provide the result of "recycle the WEEE to ready to use reusable material"
3. Assurance that the Scheme is effective so that the WEEE problem will not remain as a problem locally or export elsewhere in the world
4. The Scheme will not discourage the replacement of old environmental unfriendly EEE
5. Minimum disturbance to the trade and the public

Thank you for your attention.

Yours truly,



Albert Tang
Chairman
Hong Kong Suppliers Association

c.c.: Panel on Environmental Affairs, Legislative Council 
Retail Task Force, Business Facilitation Advisory Committee
Hon Audrey Eu Yuet Mee, Chairman, Panel on Environmental Affairs
Hon Vincent Fang Kang, Legislative Council Member, Wholesale and Retail

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