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Legislative Council Secretariat
3/F Citibank Tower
3 Garden Road
Central
Hong Kong

Attn: Mrs. Mary Tang
Clerk to the Panel on Environmental Affairs

Dear ,

Green Council Submission on the Proposal for an Environmental Levy on Plastic Shopping Bags for the Panel on Environmental Affairs Meeting of July 16, 2007

On behalf of the Green Council, I thank the Chairman of the Panel on Environmental Affairs for inviting my organization to provide comments on the Proposal. As the leading Hong Kong-based NGO focused upon environmental education and operation of the Hong Kong Green Label Scheme, we are very pleased to submit our views. Our comments and suggestions are as follows:

General Comments

- (a) The Green Council supports the Proposal in principle, and especially its central objectives of quickly and significantly reducing indiscriminate use of plastic shopping bags through imposing financial incentives and achieving a longer-term major and sustained reduction in overall plastic shopping bag usage and disposal. We concur that using a “producer responsibility” approach should help prevent and control environmental degradation caused by the haphazard and large-scale use of plastic bags. According to government statistics, each Hong Kong citizen disposes of more than 3 plastic bags every day. This has resulted in tremendous environmental problems including quickly diminishing landfill space and upsetting ecological system balance. Imposing a plastic bag levy should induce desirable and necessary reductions in indiscriminate use and disposal of plastic bags and stimulate the supply, acceptance and use of more appropriate and environmentally preferable substitutes.

- (b) Much of the “waste” presently sent to landfills by businesses, households, institutions and governments could be reduced and even avoided through procurement policies and practices that advocate and facilitate the reduction, reuse, and recycling of relevant materials. The Green Council is committed and determined to encourage and assist purchasers (i.e. consumers in all sectors) to incorporate environmental considerations into their procurement processes and practices. This encompasses the introduction and application of environmentally preferable criteria for select product and service categories, identification of product groups and types with significant environmental impacts, development and sharing of environmentally responsible procurement policies and strategies, formulation and sharing of environmental impacts evaluation methods, promotion of '3R' considerations, etc.

Specific Comments

The Scope (Paragraphs 7-9 of the Proposal)

- (a) Chain or large supermarkets, convenience stores and personal health and beauty stores, which constitute only 4% of Hong Kong’s retail outlets, are currently the only “relevant retailers” specified in this Proposal. Other shopping outlets such as department stores and other retail outlets should definitely be phased in and controlled in a next stage. This “phases approach” should be explicitly identified and described at the outset in order to (i) assure the early “relevant retailers” that they are not being unilaterally targeted or unduly affected, and (ii) alert other retailers that they should prepare for and will be subject to the same requirements and conditions in the foreseeable future.
- (b) As wet markets are exempted from the Proposal, this may give rise to indiscriminate and excessive procurement of plastic bags at these markets as reserve for other purposes. Specifically, customers may obtain extra bags from these markets to avoid paying the levy at “relevant retailers” or use the extra bags for refuse disposal. Under these circumstances, the overall quantity of plastic bags obtained and disposed of may not be as significantly and appropriately reduced. We don’t have a solution to suggest for this possible development, but encourage appropriate officials to give this matter consideration.

Bags subject to the Environmental Levy (Paragraphs 10 and 11 of the Proposal)

- (c) We agreed that no exemption of degradable plastic shopping bags from the environmental levy should be imposed, as degradable plastic bags also consume energy for their production and occupy landfill space (for those bags that cannot completely degrade in landfill conditions). Although the essence of the Proposal is to change consumer habits and reduce plastic bag consumption, it is inevitable that consumers will continue to use plastic bags at certain extend. For this reason, the provision of degradable plastics bags (i.e. those that do fully degrade in landfill conditions, preferably from renewable sources) by retailers to consumers as alternatives should nevertheless be encouraged as an environmentally preferable and therefore desirable option.

The Administration of the Scheme (Paragraph 12 of the Proposal)

- (d) Given that the “relevant retailers” are the portals for the distribution of the plastic bags, it is logical that these entities should play a major and direct role in encouraging consumers to consider and reduce their use and disposal of plastic bags. Programmes and incentives targeted at these “relevant retailers” should be formulated and launched (see comments (c) and (f)) to encourage and enable these “relevant retailers” to demonstrate environmental consideration and responsibility themselves, and to positively influence their customers.
- (e) Review of the effectiveness of the environmental levy should be conducted regularly and results should be promulgated publicly so as to exert public governance to the Proposal and “relevant retailers”. It can also provide an opportunity to promote and demonstrate the positive impacts that can be realized through public actions and changing habits.

Impact of the Proposal (Paragraphs 13 and 14 of the Proposal)

- (f) The response to and success of the Proposal will depend largely on changing consumer attitudes, decisions and habits. Hence, we strongly suggest that a large portion of the environmental levy collected should be used in educating the public on the reasons and merits for reducing the use and disposal of plastic bags. Further, and in parallel with the environmental levy, we advocate the development and provision of complementary positive incentives for consumers, like shopping discounts or coupons, that recognize and reward positive decisions and actions. In other words, we are strongly recommending a “carrot and stick” approach to stimulate desirable changes in consumer habits and practices.
- (g) It is well known that local people often retain and reuse the plastic shopping bags for refuse disposal. Consequently, significant reductions in the selection and use of plastic bags at “relevant retailers” may actually cause consumers to proceed to buy commercially available refuse bags which are frequently non-degradable and of greater thickness than shopping plastic bags. Unfortunately, such a development could cause comparable or perhaps even worse environmental problems than those caused by the disposal of plastic shopping bags. Given this scenario, viable and environmentally-preferable methods of refuse disposal should definitely and quickly be identified, explored and promoted.

For your information, the Green Council is a Hong Kong-based non-profit and charitable organization which was established in 2000 with the motto of “Conservation begins with Education”. Its mission is to promote, support and facilitate environmental consideration, conservation and management amongst local industries and the general public through various programmes and educational/awareness-raising initiatives. Of particular note, its officials have extensive experience and success in the field of environmentally preferable products/services identification, certification and promotion.

We hope the above comments and suggestions are useful for the Panel's discussion and any follow-up work and related initiatives.

Yours sincerely,

Linda W. P. Ho
Chief Executive Officer

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