



香港塑料袋業廠商會
Hong Kong Plastic Bags Manufacturers' Association

香港尖沙咀漆咸道南 107 -109 號中晶金融中心 15 字樓
15/F Oriental Crystal Finance Centre, 107 - 109 Chatham Road South, Tsimshatsui, Kln, Hong Kong
Tel: (852) 2394 5912 / 2394 5916 Fax: (852) 2399 0152 E-mail: admin@hkpoma.org.hk

CB(1) 2781/10-11(05)

「擴大塑膠購物袋徵費計劃」 意見書

2011 年 7 月 20 日

香港塑料袋業廠商會

香港塑料袋業廠商會

Hong Kong Plastic Bags Manufacturers' Association

香港九龍尖沙咀漆咸道南 107-109 號中晶金融中心 15 樓

15/F., Oriental Finance Center, 107-109 Chatham Road South, Tsimshatsui, Hong Kong

電話/Tel: +852 23945912

傳真/Fax: +852 23990152

電郵/E-mail: admin@hkpoma.org.hk

網址/website: www.hkpoma.org.hk



香港塑料袋業廠商會

Hong Kong Plastic Bags Manufacturers' Association

香港尖沙咀漆咸道南 107 -109 號中晶金融中心 15 字樓

15/F Oriental Crystal Finance Centre, 107 - 109 Chatham Road South, Tsimshatsui, Kln, Hong Kong

Tel: (852) 2394 5912 / 2394 5916

Fax: (852) 2399 0152

E-mail: admin@hkpbma.org.hk

徵費計劃害環保，損民生，極擾民 環保袋(不織布膠袋) 激增96%、塑膠原料耗量增 27%，還要繼續嗎? 惡法應立刻廢除

本會就環境局提出「擴大塑膠購物袋環保徵費計劃」的公眾諮詢(下簡稱：文件) 表示遺憾，市民選用不織布膠袋，卻比背心膠袋耗用更多膠粒。減用膠袋方法多，為什麼當局仍要堅持選用懲罰市民的環保徵費計劃?進一步加重市民經濟負擔、推高通脹，結果得不償失!膠袋收費計劃實施至今天已兩年。當政府從偏執的數字上以為收費計劃是成功的，事實上卻造成另一種污染。

【用膠量激增，堆填區受壓】

根據商會調查發現，膠袋徵費後不織布袋有 96%的增幅。徵費迫使市民改用其他包裝物品取締膠袋。徵費後現今造成不織布袋、垃圾袋激增，若進一步擴大向不織布袋、垃圾袋收費，下一步市民又轉移多用紙袋等代替品，但紙袋的製作過程及碳排放量卻比膠袋更大。這樣只會造成更多污染，令堆填區受壓。

【促政府交代徵費後用膠量及紙袋數字】

現階段政府檢討膠袋徵費一事，應該要檢討其成效，市民徵費後減少使用背心袋，卻造成使用其他代用品的數字上升，很多不同的包裝物品有濫發現象，因此希望政府能負責任地公佈有關各種包裝物品因膠袋徵費引起的數字變化，反映實際耗膠量。

【0.4%堆填區的不織布膠袋低估了耗膠量】

環保署所公佈堆填區 0.4%的不織布膠袋增量被遠遠低估了。因為每一個不織布袋的耗膠量是背心袋的 50 倍。實際增加了堆填區的壓力。

【向民生開刀，影響通脹及擾民】

膠袋是日常必需品，基層市民習慣重用膠袋，例如作垃圾袋使用。如今卻要額外付出費用購買垃圾袋，令現行的徵費計劃好心做壞事，以後陸續有來的徵費勢必令基層百上加斤。建議用獎勵性方法誘導市民支持環保，參與回收。

【政府推卸責任，立法形同虛設，陷小市民與商戶不收費便犯法的兩難局面】

就文件建議，將第一階段的膠袋徵費計劃收費由稅收改為由商



香港塑料袋業廠商會

Hong Kong Plastic Bags Manufacturers' Association

香港尖沙咀漆咸道南 107 -109 號中晶金融中心 15 字樓

15/F Oriental Crystal Finance Centre, 107 - 109 Chatham Road South, Tsimshatsui, Kln, Hong Kong

Tel: (852) 2394 5912 / 2394 5916

Fax: (852) 2399 0152

E-mail: admin@hkpbma.org.hk

戶自行收取，將商戶分化，造成不公。政府將責任推到市民商戶身上，將進一步加重市民經濟負擔，擴展膠袋徵費計劃的涵蓋範圍，同時亦將加重中小企業的法律責任，市民、商戶陷入不收費便犯法的兩難局面。

【促建立完善回收系統，認證環保塑膠物料】

「寓禁於徵」不能減去必需用的膠袋，回收才是正確方法。本會促請當局必須先做好完善回收系統才是環保的根本；勿將環保責任推卸於商戶市民身上。徵費計劃的目的是希望透過經濟的手段，遏止濫用塑膠購物袋，然而卻沒有效法國外成功的例子，政府先撥資源搞好回收系統，最後才考慮徵費事宜。因此無論款項上繳庫房或撥歸商戶收益，也並不能搞好環保工作。綜觀其他國家、城市，例如中國、日本、愛爾蘭、台灣早已先做好回收，下一步才實施相類似的《購物膠袋禁令》法規，可惜香港政府卻未能做好環保的基本工作 - 回收，卻只著眼懲罰性收費，導致引發更多重型的包裝物品應運而生。

【建議】：

「支持環保，反對單一針對膠袋徵費」

- 取消懲罰性稅收，轉為獎勵性方式鼓勵市民多做回收工作
- 環保產品稅項優惠
- 政府應正面推出環保方案，以不影響民生為大前提
- 立法管制塑膠產品含再生塑料成份，政府帶頭推動選用含再生塑料成份膠袋，帶頭綠色採購
- 建立完善回收膠袋系統，增加就業機會
- 資助同業轉營
- 超市、大型零售點放置膠袋回收箱

【結論】：

請政府選用不擾民方案推行環保方案，擴大徵費計劃只會令污染更嚴重，令基層市民受苦。棄用背心購物袋，塑膠垃圾、紙袋等亦只會急升，請立刻廢除徵費計劃。同時盼落實完善的回收系統，多撥資源發展綠色塑膠袋及立法採購綠色塑袋，提供綠色稅項優惠，令市場增加更多誘因採購綠色產品。

香港塑料袋業廠商會

會長 麥燦枝

2011年7月20日



國外實證

開徵膠袋稅，弄巧成拙

世界各地有關膠袋稅的實例可見，開徵膠袋收費未能成效，更不被多國接受。

1. 蘇格蘭：膠袋稅物不所值

2006 年 9 月蘇格蘭環境及鄉郊發展委員會建議不可徵收膠袋稅 (附註 1a)，當地本實行膠袋稅的，但經考量，當地環境保護委員會亦表決不應立法徵收膠袋稅。因為徵收膠袋稅對減廢和保護環境工作沒有正面的幫助，而且動用的行政費遠超過環保成效，物不所值。同年 10 月 25 日蘇格蘭政府撤銷徵收膠袋稅建議。(附註 1b)

2. 澳洲生產力委員會：減廢目標適得其反

2006 年 5 月澳洲報章(THE AGE/附註 2)報導，澳洲政府屬下的生產力委員會(Productivity Commission)最新的一項報告指，在沒有充分的成本效益分析(Cost-benefit analysis)前，政府不應在 2008 年底前實行禁止使用膠袋措施，且認為加強打擊亂拋垃圾會更有效控制膠袋所造成之環境污染。報告指出，隨地亂拋的垃圾中，膠袋為數少於 2%，而膠袋只佔堆填區的 0.2%，且膠袋對堆填區有穩固的作用。

委員會主席 Philip Weickhardt 指出，禁絕超市膠袋可能會導致更多人改用更大更重的垃圾袋，這使減廢目標適得其反。報告又質疑所謂膠袋會影響海洋生態之說，至今仍未有論證指膠袋為直接元兇。

3. 澳洲：禁用膠袋帶來的更嚴重的環境問題

2006 年 9 月 22 日澳洲報章(The Australian/ 附註 3)指出，據當地政府一份獨立調查報告顯示，禁用膠袋後對環境的損害比繼續使用膠袋高，而且會帶來的更嚴重的環境問題。

4. 澳洲環境部部長：耗用資源遠超 4 倍

2006 年 8 月澳洲環境部部長(Ian Campbell)親筆回應業界有關膠袋稅的

問題，他表示不應開徵膠袋稅，亦不會禁用膠袋，因為禁用膠袋所耗用資源比對環境造成的損害遠超 4 倍。因為澳洲政府認為該國在 2002 年所推行的減廢措施十分奏效，故無需立法或採取收稅模式減少膠袋用量。(附註 4)。

5. 德國：禁用膠袋對環境損害更大

2004 年德國 GVM (Gesellschaft für Verpackungsmarktforschung) 研究得出，禁用膠袋用改用其他包裝物料，廢物數量、體積、能源消耗、溫室氣體排放量和運輸物流等的成本也會相應大增，對環境損害會更大。(附註 5)

6. 愛爾蘭：開徵膠袋稅弄巧成拙

愛爾蘭早前開徵膠袋稅弄巧成拙(附註 6)，雖然購物膠袋減少了九成，但是垃圾膠袋數量卻大幅增加。愛爾蘭自 2002 年實施膠袋稅之後，經過數年的政策實施後，整體塑膠用量勁升 30% (2004 年比 2003 年)，單一徵收膠袋稅對環保並沒有任何幫助。措施實行後，膠袋入口更勁升 19% (2005 年比 2004)。因稅收未可達到環保成效，更於同年 7 月決定上調膠袋收費。

7. 台灣：塑膠袋總用量暴增一倍以上

在台灣，自從民進黨執政後實施膠袋稅以來，數萬塑膠袋業從業員面臨失業，塑膠袋垃圾既沒有減少，而每年的塑膠袋垃圾更由 5000 萬公噸增加至 9000 萬公噸，當地更有 60% 塑料由外地進口。台灣正是一個環保與經濟都雙輸的政策。因此台灣小吃店於 2005 年 5 月起解禁政策。

(附註 1a) 蘇格蘭環境及鄉郊發展委員會建議不可徵收膠袋稅

議會報告網址:

<http://www.scottish.parliament.uk/business/committees/environment/reports-06/rar06-12.htm>

議會報告節錄:

The final conclusion reached by the 9 Members of Scottish Parliament, composing of 4 Labour party members, 2 Scottish National Party members, 1 Liberal Democrat, 1 Conservative and 1 Green party member was reached UNANIMOUSLY by the committee and states:-

"19. The Committee reiterates its support for the Bill's stated objectives. To achieve these objectives, the Committee urges the Executive to include ambitious measures to address plastic bag use in its waste prevention strategy. The Committee is not persuaded that the levy as currently proposed in this Bill is an effective means to achieve these objectives. The Committee, therefore, recommends that the Parliament does not agree to the general principles of the Bill."

To put this into perspective, it is clear that **ALL** political parties agree that a tax on plastic bags, for that is what was proposed, is not considered an intelligent response to what is perceived to be a problem.

(附註 1b)

THE GOOD NEWS FROM SCOTLAND TODAY

Plastic bag tax plan abandoned but retailers are told to cut use

DOUGLAS FRASER
douglas.fraser@theherald.co.uk

PLANS to tax plastic bags were yesterday abandoned at Holyrood, although the Environment Minister warned retailers that if they do not reduce giveaway bag numbers, they could face future legislation.

Mike Pringle, the Liberal Democrat MSP for Edinburgh South, dropped his members' bill, having faced opposition from retailers and lacking support among fellow MSPs.

He said he had, however, raised the profile of the environmental damage caused by bags, proposing an "environmental levy" similar to one which already operates in Ireland.

Ross Finnie, the Environment Minister, welcomed the move. However, he warned that if retailers do not sign up to a voluntary code of conduct – which in Australia has reduced the number of bags used by 45% – a law would be reconsidered.

He said that during the bill's consideration by MSPs,

various action on plastic bags had been taken by retailers including Tesco, Asda, Sainsbury's, Ikea, B&Q, Lidl and Dixons.

A waste prevention plan is to be published by the end of the year, along with Britain-wide targets for reducing bag use.

"I would strongly urge retailers to sign up to the voluntary code and I'd expect to see progress shortly," said Mr Finnie. "If agreement cannot be reached, then legislation may have to be considered."

"THE HERALD"
25/10/06

Don't ban the bag: report

By **NASSIM KHADEM**

RETAILERS and governments should abandon plans to phase out plastic shopping bags by 2008, according to a Productivity Commission report.

The independent advisory body on policy and regulation has presented its report on waste management, saying while more Australians are recycling than ever before, it can be a costly and ineffective method of reducing waste.

The report said that in 2002-03, Australians generated 32.4 million tonnes of waste, with 15 million tonnes of it recovered for recycling. In Victoria, waste recovered through recycling increased from about 40 per cent in 1994-95 to 51 per cent in 2002-03.

A number of states, including Victoria, have developed "zero waste to landfill" policies — encouraging waste reduction and recycling — which in theory aim to stop waste being dumped in landfills. The State Government wants 65 per cent of all municipal waste and 80 per cent of all commercial and industrial waste diverted from landfill by 2014.

But the report said that "zero waste" policies were almost impossible to achieve.

Governments are working with retailers to phase out single-use plastic bags by the end of 2008, but the report recommends they scrap the plan until a cost-benefit analysis is carried out.

Presiding commissioner Philip Weickhardt said the reduction in plastic shopping bags had simply resulted in more

Australians buying large rubbish bin bags. "Before you ban them, you need to think carefully about whether there are cheaper options," he said. "This appears to be a heavy-handed approach."

The report also calls on state governments to scrap levies on landfills. Victorians pay the \$7-a-tonne levy through their rates. The report says that while waste disposal results in pollution, it could be reduced to very low levels through "appropriate regulation" rather than landfill levies.

The report also questions whether local councils are best placed to manage domestic waste collection, suggesting regional bodies — similar to those regulating water and sewerage — be established to deal with the problem.

THE AGE 23/5/06

澳洲政府屬下的生產力委員會(Productivity Commission)最新的一項報告指，在沒有充分的成本效益分析(Cost-benefit analysis)前，政府不應在 2008 年底實行禁止使用膠袋措施，且認為加強打擊亂拋垃圾會更有效控制膠袋所造成之環境污染。報告指出，隨地亂拋的垃圾中，膠袋為數少於 2%，而膠袋只佔堆填區的 0.2%，且膠袋對堆填區有穩固的作用。

委員會主席 Peter Weickhardt 指出，禁絕超市膠袋可能會導致更多人改用更大更重的垃圾袋，這使減廢目標適得其反。報告又質疑所謂膠袋會影響海洋生態之說，至今仍未有論證指膠袋為直接元兇。

高造成多 4 倍之損害

THE AUSTRALIAN FRIDAY SEPTEMBER 22 2006

6 THE NATION

Ban on plastic bags 'not worth the cost'

Matthew Warren

THE cost of banning plastic bags is about four times higher than the environmental harm they cause, according to an independent report handed to the Victorian Government before it announced a bag tax in July.

Slower checkouts and retraining of retail staff could cost more than \$1 billion over the next 10 years, which would be only partially offset by the environmental benefit of removing plastic bags from the litter stream.

The findings followed a warning by the Productivity Commission in May that bans on plastic bags should not proceed unless supported by "transparent cost-benefit analysis", suggesting tougher anti-litter laws and greater community participation as possible alternatives.

Despite both these warning signs, the Bracks Government

announced in July a ban on free plastic bags from large supermarkets, with most bags attracting a mandatory 10c levy from 2009.

At the time, it was reported the move could be the catalyst for a nationwide ban, with NSW and South Australia already considering similar measures despite research suggesting the costs outweigh the benefits.

The Allen Consulting cost-benefit report of nine phase-out strategies to the Environment Protection and Heritage Council in May estimated a cost of between \$650 million and \$1.3 billion between last year and 2016. Victorian Environment Minister John Thwaites is a member of the EPHC.

The report then allocated an environmental cost of \$1 for each of the 40-60 million bags that become litter each year based on the value of volunteers' time to

clean them up — but then admitted this value was probably "generous".

Taking all these factors into account, the net cost of phasing out plastic bags in Australia would be between \$45 million and \$85 million each year. This was the result of the relatively high cost of a widespread or total ban in order to cut the relatively high litter and environmental impact of a relatively small proportion of bags.

Plastic bags make up less than 1 per cent of domestic waste in Australia. They are estimated to be about 2 per cent of total litter in the country.

An Environment Australia report on plastic bags in 2002 estimated that the cost of cleaning up littered plastic bags was about \$4 million a year.

The impact of plastic bags is considered to be higher than many other litter items because

of their persistence in the environment and capacity to injure wildlife, particularly in marine environments.

A spokesman for Mr Thwaites said last night the strategy applied in Victoria was not specifically included in the EPHC report.

The plastics industry said last night the report demonstrated a levy on plastic bags would not address the problem with litter.

Plastics and Chemicals Industries Association chief executive Michael Catchpole said that in all scenarios modelled the economic costs exceed the environmental benefits "by substantial margins".

"Litter is — and always has been — the issue that business, government and the community needs to address when considering the uses for and value of lightweight plastic bags," Mr Catchpole said.

(附註 4) 澳洲環境及文化部部长 Ian Campbell 於 2006 年 8 月就業

界查詢澳洲使用膠袋情況的回覆



SENATOR THE HON IAN CAMPBELL
Minister for the Environment and Heritage
Senator for Western Australia

1 0 AUG 2006

Mr J Neil Young
Managing Director
Simpac Ltd
Neil.Young@Simpac.co.uk

Dear Mr Young

Thank you for your email of 26 May 2006 concerning recent developments regarding plastic shopping bags in Scotland, Ireland and other countries.

You may be interested to know that Australia has adopted a more cautious approach to this issue than has been the case in Ireland and other countries. The focus of our efforts to date has been on voluntary action to reduce the impact of plastic bags on the environment. This approach has yielded outstanding results in a relatively short period. As you indicate in your letter, major supermarkets have reported using 45 per cent fewer bags than they did in 2002. A large proportion of the bags used now are the more efficient, reusable bags. In total, three billion single use plastic bags have been taken out of circulation since 2002, without recourse to regulation.

However, as a significant number of plastic bags are still entering the environment as litter, the Environment Protection and Heritage Council recently reaffirmed its resolve to phase out plastic bags by the end of 2008. The means by which this phase-out will be achieved are still to be determined, but it could include voluntary, co-regulatory or regulatory measures. I have made clear the opposition of the Australian Government to the imposition of a tax on plastic bags.

I am aware that plastic bags have a number of positive uses and are valued by many consumers for their usefulness as a cheap, efficient and hygienic means of transporting goods. I also acknowledge that many consumers value them for secondary purposes, including their use as bin liners.

Biodegradable bags may provide a solution to the environmental problems associated with the lightweight bags remaining in use whilst still providing an appropriate hygienic means of waste disposal. The Government is therefore working with the plastics industry, retailers and Standards Australia to develop Australian Standards for a range of degradable plastics. I understand that a suite of Australian Standards for biodegradable plastic should be available soon. Further information on these standards can be found at: www.standards.org.au. I have also provided \$40,000 to the Plastics and Chemicals Industries Association to develop a 'national guide and commitment' to assist in the introduction of biodegradable plastics in Australia.

Canberra
Parliament House, Canberra ACT 2600
Telephone: 02 6277 7640
Fax: 02 6273 6101

Perth
GPO Box B58, Perth WA 6838
Telephone: 08 9325 4227
Fax: 08 9325 7906

In your letter you refer to the recent draft report on waste generation and resource efficiency issued by the Productivity Commission. Although the Commission has so far only issued a draft report, and the Australian Government is yet to formally respond, I agree that transparent cost-benefit analysis is highly desirable. For this reason, the Environment Protection and Heritage Council will soon be releasing a cost-benefit analysis of various options for reducing the impact of plastic shopping bags for public consultation. You may find this document of interest when it is released.

You also referred to reusable bags. As you point out, the most popular alternative to single use high density polyethylene bags has been the 'green' polypropylene bag. From the resource use perspective, it might interest you to note that these have been found to be better for the environment on a lifecycle basis than the single use lightweight bags, provided they are reused several times before disposal. Further information on this analysis is available at the following website: <http://www.deh.gov.au/settlements/publications/waste/degradables/impact/index.html>.

Thank you for taking the trouble to write. I will ensure that the information you have provided about developments overseas is passed to the appropriate area in my Department.

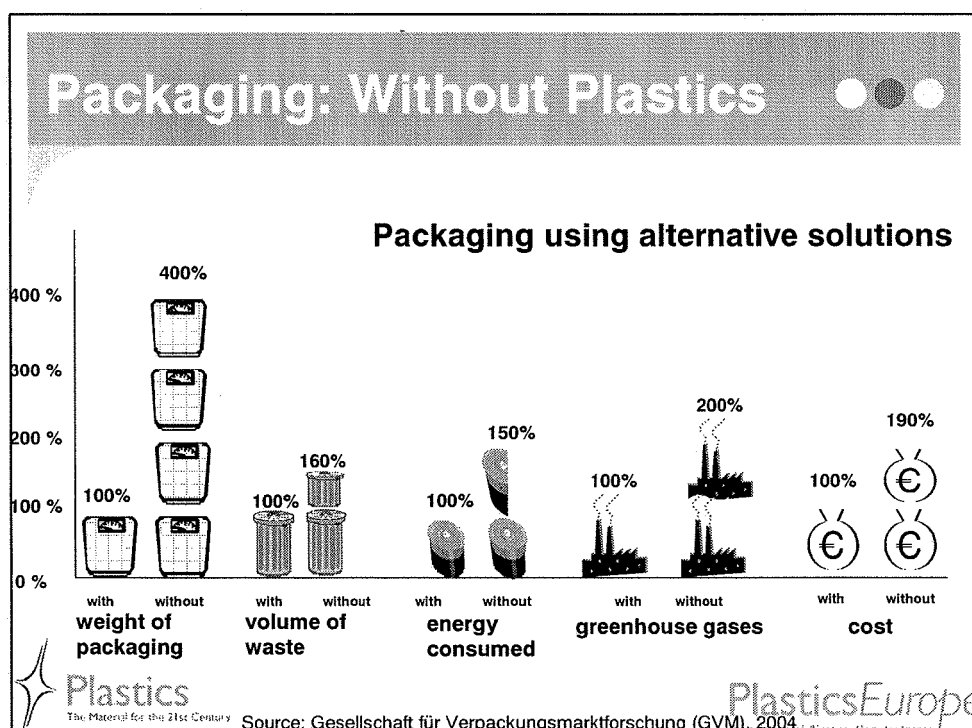
Yours sincerely

IAN CAMPBELL

(附註 5)

2004 年德國 GVM(Gesellschaft für Verpackungsmarktforschung)

研究



禁用膠袋改用其他包裝物料，對環境損害更大。包裝品的重量會增加 3 倍、家庭廢物中。包裝品的體積也增加 60%、能源消耗將再增加 50%、溫室氣體排放和運輸物流等的成本也會相應大增。

(附註 6) 在蘇格蘭及愛爾蘭 **Eire** 地區均設有店舖的商戶，在使用膠袋

及紙袋對重量、體積及價格上的比較：

IRISH FACTS¹

Retailers		Scotland	Eire	Weight	Bulk	Cost
		Wt/1000/Kg	Wt / 1000 /Kg	Multiplier	Multiplier	Multiplier
		Plastic	Paper			
Boots	Small	2.52	13.13	5.2	7.5	5
	Large	7.0	36.12	5.6	15.7	7
Next	Plc Small	13.52	66.67	4.9	11.2	7
	Medium	26.51	96.98	3.7	11.6	7
	Large	43.71	138.55	3.2	11.1	7
Miss Selfridge	Small	2.75	29.61	10.7	7.2	12
	Medium	12.91	65.26	5.5	4.7	6
	Large	23.01	108.80	4.6	4.3	4
TopShop	Medium	14.16	62.1	4.4	13.0	12
	Large	20.67	89.3	4.3	3.9	4
Burton	Small	4.56	43.53	7.6	17.8	13
	Large	35.72	104.82	2.9	3.4	5
Fresh fruit						
	4 apples	1.8	8.11	4.5	at least 15	?
	5 bananas	1.8	19.86	11.0	at least 20	?
	600 gr potatoes	1.8	23.81	13.2	at least 20	?
	loose potatoes	1.8	17.7	9.8	14	10

¹ YOUNG, Neil; 2006, Simpac Ltd, Glasgow, UK.

1 x 20 ft container

		Scotland	Eire	Bulk	Cost
		# of bags	# of bags	Multiplier	Multiplier
Tesco carriers	POLYTHENE	1,900,000			
	Woven Polypropylene		25,000	76	70
Quinns	Polythene carriers	1,900,000			
	green nonwoven polypropylene		32,800	58	32
Topshop	Polythene carriers	1,100,000			
	Nonwoven polypropylene		30,000	36	12

愛爾蘭自 2002 年實施膠袋稅之後，首年膠袋使用量大跌九成。但經過數年的政策實施後，愛爾蘭的整體塑膠用量 2004 年和 2003 年相比，勁升 30%，原因是愛爾蘭人改用免稅垃圾袋、食物袋、紙袋、發泡膠或硬膠盛載器皿來代替塑膠手挽袋。從這看出單一徵收膠袋稅對環保並沒有任何幫助。

據了解，由於市民使用膠袋的習慣沒有根本性的改變，2005 年比 2004 年膠袋入口更勁升 19%。愛爾蘭政府見稅收未見成效，現在更考慮把稅率加倍，相信此舉更令愛爾蘭人改用更多更重更不環保的塑膠代用物品。

從可以看出，同一容量的膠袋遠比紙袋更輕、更省儲存空間及價格更為廉宜。

“紙袋比膠袋更環保”

根據美國環保署資料顯示²，比較生產、制造、回收等同容量的膠袋和紙袋的過程，紙袋比膠袋更消耗能源及更污染：

- 紙袋比膠袋多產生 70% 空氣污染
- 紙袋比膠袋多產生 50 倍水質污染
- 一公斤紙袋在回收過程中比一公斤膠袋多耗 91% 能量
- 紙袋比膠袋在生產過程中多耗 4 倍能源（例如：英國超市連鎖店 Safeway，他們的膠袋在生產時耗能 594BTU³，而同樣尺寸的紙袋需用 2,511 BTU 能源單位生產。）

除此以外，紙袋在堆填區埋藏分解時亦會產生二氧化碳及甲烷 (methane) 等溫室氣體，改用紙袋絕對無助環保，亦不會比膠袋環保。

² US Environmental Protection Agency, "Questions About Your Community: Shopping Bags: Paper or Plastic or . . .?"

<http://www.epa.gov/region1/communities/shopbags.html>

³ BTU – British Thermal Unit