

Hong Kong, April 19, 2013

Subcommittee on Environmental Affairs  
Legislative Council Secretariat  
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1 Legislative Council Road  
Central, Hong Kong  
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**Re: "Glass Recycling "**

Dear Chairman and Members,

Attached please find our views submitted during the public engagement on the proposed producer responsibility scheme on Glass Beverage Bottles:

1. All glass containers should be covered;
2. Fees should be collected from all importers and local manufacturers based on the volume of glass containers distributed. Fees collected are to be put in a fund to subsidize recycling and activities in support of recycling.
3. Keep it simple: Make sure that each clean glass container (over a minimum size?) has a return value. This value will help motivate the vibrant local economy of domestic helpers, waste collectors and scavengers to cleanse bottles, keep them separate and deliver them to collection points where they are 'bought' in the same as happens now for paper, alu, metal, and plastics.
4. Because the value of used glass is low, market incentives have to be created until such time as used glass (and the products made of used glass) will become valuable enough. This is likely to happen once there is enough volume. The system should assume that subsidizing glass recyclers may become self sufficient in the future. The qualification of recyclers for collecting and processing glass will be based on various criteria, among others their ability to build capacity for collection, processing payments, recycling, as well as marketing and sales of products produced. Failures to meet KPIs in these areas result in reduction and even loss of subsidy.
5. Keep it simple – exemptions should be avoided and are best limited to existing distributors if they wish to continue. Exemptions will confuse consumers unless there is a reasonable gap between the deposit and the amount you get for an empty bottle from the recycler and are best avoided
6. HK's recycling rate of materials with value is high. Landfill bans for glass are unnecessary if the scheme is properly set up as suggested above. Bans are costly to enforce.

PRS on glass will force importers and manufacturers to consider the cost of other packaging. Collecting revenue for ALL packaging (and disposable products) becomes thus increasingly urgent. Whether other packaging materials require intervention with subsidies of collectors and/or recyclers is subject to market conditions for those materials.

In general, separation of wet waste from all other waste is key to allowing the vibrant local recycling economy to separate waste even more efficiently. We urge Government to promote the separation of wet waste at source with APIs such as 'Don't Contaminate Your Waste' and 'Would You Make Your Hands Dirty to Make a Dime?'

Yours sincerely,

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CEO