



香港廢物管理學會

Hong Kong Waste Management Association

P.O. Box 28705, Gloucester Road, Hong Kong

<http://www.hongkongwma.org.hk>

Ir Dr Hon LO Wai-kwok, SBS, MH, JP
Chairman of the Bills Committee
Legislative Council
Hong Kong SAR

30 Nov 2015

Dear Chairman,

Re: Promotion of Recycling and Proper Disposal (Product Container) (Amendment) Bill 2015

The HKWMA generally supports “Promotion of Recycling and Proper Disposal (Product Container) (Amendment) Bill 2015”. The promotion of producer responsibility is an international trend where jurisdictions across the globe shape the behavior of consumers and stakeholders along the supply chain by internalizing the environmental costs into the life-cycle of consumer products. Such cost sharing has been proven to be an effective driver for waste reduction. This practice is taking root in Hong Kong as a core component of our waste management strategy.

Waste reduction is the key task our government pursues to lower our dependability on waste treatment and disposal facilities. The HKWMA supports the HKSAR government to implement policies to avoid, reduce, reuse, collect, and treat the wastes while promote the development of local recycling industries.

The HKWMA fully recognized the successful change of consumer behavior during the launch of 1st phase of Plastic Shopping Bags (PSB) Levy Scheme in 2009 and experience gained from this Producer Responsibility Scheme (PRS). In 2015, HKSAR has also extended the coverage of PSB Environmental Levy Scheme and is drafting the legislation on another PRS dealing with waste electrical and electronic equipment (“WEEE”).

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The HKWMA recommends the HKSAR making reference to Asian experience and taking lead on green procurement to sustain and encourage demand for products having recycled glass content. The HKSAR has to play a key role in publicity and public education to promote the recycling of waste glass beverage bottles. Governments in many other jurisdictions like Japan, Taiwan and South Korea, have also adopted a similar approach in playing a key role for such initiative.

The HKWMA suggests the government to provide further detailed explanation of the levy index figures obtained from foreign experience and outline specific levy level intended for different stakeholders and general public to review before prescribing the levy.

The HKMWA has noticed that consumer products for Hong Kong market are mostly imported (instead of manufactured locally). This makes a difference with other places with local manufacturing where their PRS measures would create corresponding incentives for businesses to adopt eco friendly manufacturing processes and product designs.

Relying on trans-boundary recycling operations will generate extra carbon emissions during logistics handling and does not offer sufficient reliability for Hong Kong. Thus, PRS strategy should aim to create a local solution comprising an efficient collection mechanism with key stakeholders mandated by laws or coordinated by a government managed contractor, to control the movement of used products from consumers to treatment facilities, with other statutory regulations, such as import/export control (to avoid dumping outside Hong Kong or transfer to neighboring jurisdictions) and other licensing requirements (on collection, storage and processing, etc.) to ensure acceptable standards to be maintained during the recycling operations.

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In conclusion, HKWMA supports "Promotion of Recycling and Proper Disposal (Product Container) (Amendment) Bill 2015". The ultimate goal should be set to encourage stakeholders from different industries and communities to participate into different voluntary recycling programs, and in the long run, create conditions for the city-wide mandatory glass bottle PRS.

Thank you very much for your attention.

Faithfully yours,

Victor C. Li

Chairperson