



Environmental Association Ltd.
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Tai Po, Hong Kong

Clerk to Subcommittee on Promotion of Recycling and Proper Disposal (Electrical Equipment and Electronic Equipment) (Amendment) Ordinance 2016 (Commencement) Notice 2017 and Product Eco-Responsibility (Regulated Electrical Equipment) Regulation
Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

19th May, 2017

Reference: Written submission for Government's proposed implementation arrangements for proper disposal of electronic equipment

Dear Secretariat,

Thank you for your invitation to the Legislative Council Panel on the 23th of May and our organisation gladly submits our policy suggestions before the hearing. Our organisation takes great interest in Hong Kong's electrical waste management and waste reduction policies. On top of established centres at Fung Yuen Butterfly Reserve and UNESCO Geopark, we also have a recycling centre in Tai Po near the Railway Museum. There are three areas we would like to give our views on.

Firstly, we welcome the government's policy on reducing carbon emissions and electrical waste by providing a levy on suppliers, and we are also particularly pleased on the initiative in regards by supplier's removal service of old equipment. However, what happens if I have 5 televisions sets at home and would like to discard one of them. The current policy position only addresses the free removal service only if I purchase a new electrical compliance from a supplier. For this particularly scenario, does this mean I have to discard my television myself? If so, are there any guidelines that the public should read and understand?

Secondly, one of our major concerns is the levy being charged upon registered suppliers. We understand this policy derives from the philosophy of sharing the cost of carbon emission by manufacturers, suppliers and consumers, however, we find it difficult how this policy can be executed effectively. Every supplier will seek to maximise their profit by reducing cost, therefore the new levy required by the government will most likely transfer to the consumer, driving up prices. Consequently, the consumer will likely to pay the entire sum of levy, rather than sharing the burden of the cost across three parties. This contradicts to the philosophy of carbon costs, and very likely to erode the origin intent of this policy.

Due to this possible scenario, we are gravely concerned as the consumer might bare the whole cost of the levy added into their price, without sharing the cost and burden of carbon emissions properly. We would really appreciate the government to think of new methods to tackle this, as it undermines consumer's confidences in our city's environmental policies.



Lastly, we are also interested in the aftermath of our electrical waste, and whether there are regulations in regards to the operation of electrical recyclers in the city.

On the whole, we agree and support the Government's proposed implementation arrangement for suppliers and manufacturers. We advise the government to rethink on the levy scheme, and see how it can share the cost of carbon emission equally across differently parties. We also advise that more support and incentives such as above, are needed to make sure the success of the scheme and the cooperation of the community.

Thank you very much and I look forward to your reply. If there are any questions, please do not hesitate to contact us.

Yours faithfully,

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