



The Honourable Tanya Chan
Chairman for the Panel on Environmental Affairs
Legislative Council Complex
1 Legislative Council Road, Central

香港 九龍 紅磡
Hung Hom Kowloon Hong Kong
Tel (852) 2766 5111 Fax (852) 2764 5574
Email polyu@polyu.edu.hk
Website www.polyu.edu.hk

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**Bringing the Producer Responsibility Scheme
on Waste electrical and electronic equipment (WPRS) into operation
for LegCo EA Panel meeting on 23 Jan 2017**

Preamble

I had tendered my views when EPD proposed a mandatory produce responsibility scheme (PRS) and introduced the Promotion of Recycling and Proper Disposal (Electrical Equipment and Electronic Equipment) (Amendment) Bill 2015, and I am pleased to learn that LegCo approved it as Ordinance in March 2016 as the enabling legislation for the WPRS. Since then, EPD is working on the remaining preparatory work with a view to bring the WPRS into operation by phases in 2017/8.

As an academic and professional in promoting recycling technology and business in Hong Kong, in the past couple of years, I have been working closely with different stake-holders including EPD, to formulate the necessary details in bringing the WPRS into operation with a view that the WPRS is practical when implemented with various stakeholders. I am glad to learn that EPD has scheduled to brief the LegCo Panel on Environmental Affairs ("EAP") at its meeting on 23 January 2017 about the progress of the WPRS.

To this purpose, **I write to endorse strongly the following key areas.**

I. The WPRS is the right move to promote safe and efficient recycling and reuse of regulated e-wastes (or REE)

- a. The WPRS provides more effective control of REE by offering a specific scope of regulated electrical equipment (REE) which account for about 85% of WEEE generated in Hong Kong.

b. The WPRS will profoundly improve the resource management in Hong Kong by properly dealing with REE, from which reusable materials are extracted by certified recycling entities. Under the licensing control proposed in the WPRS, the operating entities will obtain the waste disposal license only when its operations (e.g. dismantling, detoxification) are proven to be environmentally sound.

c. The WPRS will assist in reducing environmental risks caused by inappropriate storage of REE. Threats to the environment such as groundwater and soil contamination due to a lack of proper shelter may occur if no regulation is in place. The proposed licensing control under the Waste Disposal Ordinance (WDO) aims at avoiding these risks.

II. Taking the WEEETRF as showcase

a. The proposed license control lays the foundation to facilitate a “healthy” development of the local REE recycling industry, apart from the environmental benefits. Operations related to storage, treatment, reprocessing, and recycling of REE will be evaluated before issuing a license. It undoubtedly helps keep track the performance of these operations, the related facilities and resource management. It also encourages local REE recycling industry to upgrade their technology and associated equipment, to order to meet the new regulations and license control.

b. The proposed licensing control also assists in addressing issues in handling REE regarding Environment, workers’ Health and Safety (EHS awareness in handling REE). The recycling entities must take EHS considerations and follow a good practice (e.g. stack management, fire hazards, security, standard operation procedures, etc.) before applying for a license. As such, the risks of EHS in recycling industry will be greatly reduced.

c. The WPRS will also help control the e-waste improper trading in and out of Hong Kong, which may aggravate the e-waste situation in Hong Kong if it is not regulated. In order to tackle the problem, the WPRS proposes a permit control on the import and export of regulated e-waste. Eligible recyclers as REE recipients are required to obtain legitimate permit before any import or export activities taken place.

d. The upcoming WEEETRF shall play an important role to showcase how a local REE recycling plant can meet the proposed license control and permit control (Items a, b, c above refers), so that other local REE recycler can benchmark with.

III. Global best practices and their local customization of recycling REE

Compared with overseas countries and regions, Hong Kong is lagging behind in handling REE recycling in terms of technology, operational know-hows, and management framework. To shorten the learning cycle, there is a need for the Government, the academic and the trade to work closely together to provide support to local REE recyclers with a view to upgrade the EHS and operation practice on storage and treatment of REE.

IV. Collaboration between stake-holders and support to recycling industry

This is a critical time where we need to formulate and put in all the needed operational details for the WPRS, and these details should be workable and can be implemented in various stakeholders. To this end, EPD should work closely with various stakeholders without which the WPRS cannot be implemented successfully. Last but not least, Government should get ready to provide necessary training and resources to the recycling industry for the WPRS implementation where appropriate.



Prof. Winco K.C. Yung
Professor, PhD, FHKIE, CEng, MIEEE, SrMHKSQ
Centre-in-Charge, PCB Technology Centre
Associate Director, Advanced Manufacturing Technology Centre
Manager & Principal Investigator, Green Manufacturing & Eco-Design Research Group
Chairman, Manufacturing & Industrial Discipline Advisory Panel, HKIE (2013-16)

Tel: (852) 2766-6599
Room EF631, Department of Industrial and Systems Engineering,
The Hong Kong Polytechnic University
Hung Hom, Hong Kong