



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>

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20 January 2017

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

By Email: [panel\\_ea@legco.gov.hk](mailto:panel_ea@legco.gov.hk)

Dear Ms. Chan,

**Re: Producer Responsibility Scheme on Waste Electrical and Electronic Equipment**

The Hong Kong Waste Management Association (“HKWMA”) fully recognized Hong Kong has gained considerable Producer Responsibility Scheme (“PRS”) experience through the successful Environmental Levy Scheme on Plastic Shopping Bags, which aims to change behavior. HKWMA strongly supports the HKSAR Government on another PRS dealing with waste electrical and electronic equipment (“WEEE”).

WEEE has become a growing concern internationally because it contains hazardous components that are harmful to the environment and human health if not properly treated or disposed of. For instance, lead and mercury, which are usually found in electrical appliances and computers, may cause cognitive deficits in children, and damage the kidneys, liver and the neural, circulatory and reproductive systems. In addition, some WEEE contains chlorofluorocarbons and hydrochlorofluorocarbons, which destroy the ozone layer and contribute to global climate change.

At present, about 80% of WEEE generated in Hong Kong is recycled and the majority of it is sold through second-hand dealers, usually to developing countries, for re-use

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and recovery of useful materials. The temporary storage of this WEEE pending shipment has caused environmental hazards in Hong Kong. In time, demand for second-hand products in developing countries is expected to decline as the living standard improves and awareness of sustainability develops. The current exporting strategy is not environmentally sound and is indeed unsustainable.

Producer responsibility is a strategy to engage stakeholders in sharing responsibility (financial and/or physical) for the treatment or disposal of end-of-life products, so as to minimize the environmental impact. Such stakeholders include manufacturers, importers, brand agents, distributors, retailers and consumers of the relevant products.

In response to the public opinion, the Government has proceeded with the necessary planning to develop the WEEE Treatment Facility at EcoPark. The facility, which is currently under construction, will have the capability to handle 30,000 tons of e-waste annually, turning it into resources after a series of detoxification, dismantling and recycling processes.

In line with the PRS on WEEE, government co-ordination and leadership is crucial in EPR program development, HKWMA suggests the Government to strengthen the regulation in order to enhance PRS effectively:

1. We should turn WEEE into useful resources and try to put it back into the manufacturing supply chain that serves Hong Kong's market.
2. In addition to the downstream measures of recycling the collected WEEE, the Government should also focus on upstream to minimize waste generation.
3. It is advisable to incorporate green labelling, green procurement and design for the environment (DfE) into the solution for WEEE.



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4. Under the umbrella of EPR, “producers” often refers to the manufactures who have the responsibility to manage the products from the infant stage to the end-of-life stage. As Hong Kong does not have a strong industrial base, most products are imported from other countries. Therefore, the definition of “producers” should be extended to consumers, retailers, importers and distributors as long as that person is involved in the supply chain. In this case, it is vital for the Government to send a clear message to the stakeholders regarding their obligations and responsibilities. Also, public have to be educated though government programs and empowered to monitor the whole system as well.

Thank you very much for your attention.

Sincerely yours,

Victor C. Li  
Chairperson