



Hong Kong, 22nd March 2021

Dear Chair and members of the Panel on Environmental Affairs,

**Drink Without Waste's views on the
Producer Responsibility Scheme on Beverage Containers**

The *Drink Without Waste* initiative welcomes the Government's launch of a public consultation on a Producer Responsibility Scheme (PRS) aimed at reducing waste from beverage consumption in Hong Kong. *Drink Without Waste* strongly supports such a PRS. In order to minimize the impact on consumer's choice, cost and convenience while maximizing environmental outcomes, we believe the scheme should:

1. Cover all types of beverage packaging

The scheme should apply equally to all beverage container types to ensure a level playing field. If certain types of beverage packaging such as plastic bottles are singled out, producers and consumers might shift to other – less recyclable – packaging such as pouches or liquid cartons. It is easier to include all types of packaging under the legislation from the start than to add different materials later.

2. Offer small but meaningful incentives

Research commissioned by found 41% of consumers would recycle plastic beverage containers regardless of incentives, and 33% said a rebate of 5 cents would trigger them to return their used beverage packaging, implying that a rebate of 5 cents can attract over 70% of consumers to recycle their bottles. Bigger rebates increase system cost. As the gap between the return value and the market value of used materials goes up, the incentive for fraudulent activities including importing bottles from overseas will increase.

3. Build a collection network fit for Hong Kong

The government consultation suggests a recycling levy of 50 – 65 cent per 500 ml beverage container (including a 10 cent rebate) which may not be acceptable for consumers. We should be careful deploying capital-intensive collection points and focus on simple drop off points such as recycling bins, recycling centers and sorting facilities. We should also make it easy for Hong Kong's existing recycling network, the community of 400,000 informal recyclers including domestic helpers, cleaners, recycling shops and trucks, to participate in the collection of beverage containers, for example through bulk collection points.

4. Appoint a professional, not-for-profit scheme operator

Based on studies of producer responsibility schemes in other countries as well as local research, *Drink Without Waste* proposes a "Packaging Exchange" as a not-for-profit, central scheme operator. A professional management team will efficiently build up and manage the multi-pronged collection network that a successful Hong Kong PRS requires, within the legal framework drafted by Government. A diversified board comprised of



different stakeholders, including government representatives will oversee the operation, while the Advisory Council on the Environment – or a new dedicated council – can be asked to monitor the outcomes.

Drink Without Waste is an initiative of the Single-Use Beverage Packaging Working Group, an alliance with participants across the beverage value chain, resources management and NGOs, seeks to reduce 70-90% of beverage packaging going to waste by 2025. Visit www.drinkwithoutwaste.org for our research and more information.

Your sincerely,

Paul Zimmerman 司馬文

Chairman

Drink Without Waste, Single Use Beverage Packaging Working Group

Enclosed materials from *Drink Without Waste* research:

- [Press Release in response to the launch of the consultation on producer responsibility \(https://bit.ly/3ccDfFD\)](https://bit.ly/3ccDfFD)
- [Position statement on a producer responsibility scheme for beverage packaging \(https://bit.ly/391YzeX\)](https://bit.ly/391YzeX)
- [Presentation “Packaging Exchange” \(https://bit.ly/3r6ZosX\)](https://bit.ly/3r6ZosX)
- [Consumer survey: Plastic bottle recycling – public attitudes and behaviours \(https://bit.ly/3r9iM8T\)](https://bit.ly/3r9iM8T)
- [Blueprint: a statutory value-on-return scheme for Hong Kong’s beverage containers \(https://bit.ly/2PfPurT\)](https://bit.ly/2PfPurT)