



世界自然基金會
香港分會

WWF-Hong Kong

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Chairman and Members of Panel on Environmental Affairs, Legislative Council

(c/o Clerk to Panel on Environmental Affairs)
Legislative Council Complex,
1 Legislative Council Road, Central, Hong Kong

23 August 2021
(By e-mail)

Dear Sir/Madam,

Re: Panel on Environmental Affairs Meeting on 23 August 2021, agenda item #IV
“Public Consultation on the Scheme on Regulation of Disposable Plastic Tableware”

WWF understand that “Regulation of Disposable Plastic Tableware” will be discussed during the meeting of the Panel on Environmental Affairs on 23 August 2021. We would like to share with you the following perspectives:

Plastic pollution is a global crisis and WWF is urging worldwide cities to fight for a world with no plastic in nature by 2030. It’s a world where our oceans teem with marine life, not discarded nets, bottles and bags. Currently, plastic is flowing into our natural environment at an unprecedented rate – every minute, one garbage truck of plastic is dumped into our oceans. To address the plastic pollution crisis and stop leakage into the environment, we believe that the government should stop the flow of plastics from entering nature through elimination of unnecessary plastic; doubling reuse, recycling, and recovery; and ensuring the remaining plastic is sourced responsibly. Effective waste management systems and bold, new, and legally binding instruments are needed to combat marine plastic pollution.

Regarding the agenda item as captioned, WWF therefore suggests the government to take following actions:

1. Ban all expanded polystyrene (EPS) tableware by 2023

We commend the Government’s plan to phase out EPS tableware, but strongly urge the Government to speed up implementation, and push forward phase one by 2023, due to the harm posed by EPS, as well as the availability of viable tableware alternatives. Commonly used EPS products, such as Styrofoam boxes and cups, break apart easily into tiny pieces that are harmful to marine life and difficult to remove from the marine environment. The European Union, Mainland China, and parts of Africa and the United States have all banned the production and sale of Styrofoam products¹. Like the Government, we believe that Hong Kong must meet this emerging global standard, but are adamant the changes need not be delayed.

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(於香港註冊成立的擔保有限公司 Incorporated in Hong Kong with limited liability by guarantee)

<https://www.gov.hk/en/residents/government/publication/consultation/docs/2021/tableware.pdf>

2. Phase out other single-use plastic and biodegradable tableware by 2025

Again, we commend the Government's plan, but urge an accelerated timeline for implementation, with completion of phase 2 by 2025. Plastic tableware is made of non-renewable petrochemicals and is difficult to recycle and degrade. Although biodegradable plastics are usually created from renewable materials, most of them is only degradable effectively under certain conditions such as consistent heat and industrial composting environment, which are not present in neither marine nor other natural environments.

The proposed regulation scheme suggested disposable plastic and biodegradable tableware to be regulated in two phases. In phase one, all types of tableware will be banned for dine-in services but only straws, stirrers, cutlery, and plates will be regulated for takeaway services by 2025. The second phase will be reviewed and determined about 12 to 18 months upon the implementation of the first phase.

However, takeaway orders account for a large proportion of consumption in Hong Kong, especially in the context of COVID-19. There was a 55% increase in takeaway orders during the pandemic, with 21.1 million orders per week². Due to the urgency and high risk of plastic leakage to the environment, we believe this timeline should be condensed. For this reason, we advocate that all single-use plastic and biodegradable tableware for both dine-in and takeaway services be phased out by 2025.

3. Establish aid fund for the F&B industry to roll out plastic reduction measures e.g., discount offer to customers who bring their own tableware

The government suggested the F&B industry to replace single-use plastics by more eco-friendly alternatives like plant-fibre, wooden, edible tableware. Doing so only shifts the environmental burden from plastics onto other materials but still contributes to Hong Kong's excessive and expensive waste generation. Reduction at source is of vital importance in solution to plastic pollution. WWF always strives to reduce the overall usage of disposable plastic tableware. We therefore advise the government to introduce an incentive scheme to encourage the industry for implementation of plastic reduction measures. Large corporations, such as Starbucks and Pacific Coffee, have already begun implementing discount programs for customers who bring their own cups and other tableware³. In view of this, WWF believes that incentivizing the industry for sustainable practice will catalyse "bring your own" (BYO) culture on a broader scale, generating greater positive impact on the environment.

4. Provide clear and comprehensive guidelines for the F&B industry to implement the plan and strengthen public education on scheme details

There have been quite a few arguments and even showdowns between staff and customers since various plastic-free campaigns were launched off the back of many big chain restaurants like McDonald's, KFC, Café De Coral. Further, the industry members may not be fully acquainted with non-plastic alternatives in terms of availability, practicality of use and legitimacy (when legislation in place). To avoid any foreseeable conflicts and confusion, the government must provide explicit guidelines for the industry to facilitate the transition in the

² https://drive.google.com/file/d/10jjAGSpo6_4mw0qy5FjRshbVVzGiqRck/view

³ <https://www.localiiz.com/post/food-drink-7-hong-kong-cafes-that-offer-discounts-if-you-bring-your-own-mug>

matter of enforcement regulation as well as the use of alternatives. In addition, public education on regulation details is needed to be reinforced with the aim of fostering supportive engagement as much as possible to the proposed scheme.

5. Additional Steps needed to achieve a “No Plastic in Nature” world by 2030

In addition to the above-mentioned recommendations on plastic tableware, WWF advocates setting a higher levy on single-use shopping bags of any materials, with minimal exemptions, by 2022, with the funds being directed to reducing plastic consumption, rather than to the businesses. Despite the HKD 0.5 levy scheme, the plastic shopping bag disposal rate in Hong Kong has seen an increasing trend since 2015. The number of plastic bags disposed in landfills in 2019 was still as high as 4.07 billion. Although this is the first decline since the full implementation of the charging scheme in 2015, it was still higher than the overall disposal rate in 2015⁴. This shows that the existing levy has become less effective since its launch so that a more aggressive and effective change is needed to encourage “bring your own bag” culture. WWF additionally suggests the expansion of the Plastic Recycling Pilot Scheme to all districts. This scheme is currently implemented in three districts and has proved successful. For example, Eastern District collected 82,000 kg of plastic recyclables in 2020⁵. We advise the scheme should be expanded to all districts in Hong Kong as soon as possible, to increase recycling rates and minimize waste generation throughout Hong Kong. Lastly, we urge the government to accelerate the introduction and implementation of municipal solid waste (MSW) charging scheme in Hong Kong.

We believe that the above recommendations are necessary if Hong Kong is to achieve the goal of No Plastic in Nature by 2030 or earlier. We hope to see Hong Kong transform into Asia’s most sustainable and liveable city which we can all be proud of.

Yours faithfully,



Prof. Laurence McCook
Director, Oceans Conservation
WWF-Hong Kong

c.c. Secretary for the Environment, Wong Kam-sing, GBS, JP

⁴<https://www.legco.gov.hk/yr19-20/english/panels/ea/papers/ea20200525cb1-655-3-e.pdf>

⁵https://www.districtcouncils.gov.hk/east/doc/2020_2023/en/working_groups_doc/WGEPGSM/19171/e_fehc_wgepgsm_2020_010_011_tc_reply.pdf