



**香港廢物管理學會**

**Hong Kong Waste Management Association**

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Clerk to Panel on Environmental Affairs  
Legislative Council Secretariat  
3/F, Citibank Tower  
3 Garden Road  
Central  
Hong Kong

Your Ref : CB1/PL/EA  
Our Ref : HKWMA/04/2007

**BY FAX (2869 6794) AND EMAIL**

Attn : Ms Mary TANG

6 July 2007

Dear Madam

**Panel on Environmental Affairs  
Meeting on 16 July 2007  
Written Submission**

Thank you for inviting us to present our views to the meeting of the Panel on Environmental Affairs to be held on 16 July 2007. The Hong Kong Waste Management Association (HKWMA) is the premier organisation representing professionals in Hong Kong's solid waste management industry and we take an active interest in all areas represented by our membership.

The issue of an environmental levy on plastic shopping bags is likely to affect the majority of Hong Kong's population. We have consulted our members on their views and have taken these into consideration in presenting the position of the HKWMA on this issue, which is as follows:

1. HKWMA concurs with the Government's view that the problems of MSW are both serious and imminent and should be dealt with as a top priority. HKWMA also supports with the "polluter pays" principle and notes that this was mentioned by Government as far back as 1989 in the *White Paper on Pollution*, yet has been applied only selectively to-date.
2. While HKWMA agrees that the excessive consumption and disposal of plastic bags should be reduced, we have reservations that Government's current proposal to impose a levy on plastic shopping bags is the most appropriate solution.
3. HKWMA has doubts that imposing a levy on plastic shopping bags will significantly reduce the number of plastic bags disposed in our landfills, which is the stated purpose of the levy. The logic is simple. In Hong Kong many households reuse plastic shopping bags as rubbish bags for the disposal of domestic waste. Recent AC Nielsen research in New Zealand indicates that approximately 80% of the supermarket bags in that country are reused. Has a similar survey been carried out in Hong Kong? If placing a levy on plastic shopping bags reduces their availability then consumers will have to buy single-use plastic bin liners. The end result is a similar number of single-use plastic bin liners in the landfill rather than reused plastic shopping bags.

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4. In discussing the proposed levy, paragraph 4 of Government's proposal notes that "This approach has been adopted in Ireland and in Taiwan, where a reduction in the use of plastic shopping bags by about 90% and 80% respectively was recorded in the first year of implementation". What has not been mentioned is that in Ireland the levy resulted in a 50% increase in the purchase of single-use plastic bin liners. This meant more plastic and resources were used and disposed of because the single-use plastic bin liners are generally thicker than supermarket bags.
5. Furthermore, after the first year of operation, the number of plastic bags bought by the Irish public began to increase again – 100 million in 2004 and at least 113 million in 2005, a rise of over a third compared to the first year of operation. As a result, the levy has had to be doubled, effective on 1 July 2007. Clearly, imposing a levy does not result in sustained long-term benefits.
6. Hong Kong is unique in having a totally free waste disposal system, which seriously distorts the market for recycling and waste management services. Both the current proposal for a levy on plastic bags and the scheme announced recently to charge for the disposal of domestic waste would impact entirely on householders. It is neither fair nor equitable to subject the general public to charges under the "polluter pays" principle, whilst continuing to exempt commercial and industrial establishments. If Government is serious about implementing the "polluter pays" or "user pays" principle then all users – domestic, commercial and industrial – should be charged for the disposal of waste that they generate.
7. There are many different approaches that could be used, not just levies. For example, on 21 June 2007 a ban on plastic bags was placed before the Welsh Assembly Government in the UK. As of 1 July 2007, California became America's first state to initiate a mandatory recycling programme to cut down on plastic bags – Assembly Bill 2449 requires supermarkets, pharmacies and other major retail outlets to provide recycling bins to make it easier for customers to recycle their bags. We believe that further consideration of this issue needs to be carried out.
8. In conclusion, HKWMA considers that Government's proposed phased approach as well as convoluted definitions of what constitutes a "relevant retailer" and a "plastic shopping bag" is confusing and the scheme will be difficult to administer and to monitor. We do not believe that the proposed levy will bring about a drastic reduction in the number of plastic bags disposed of in our landfills and we do not believe this will have any significant impact on the quantity of waste disposed of overall.

We trust that HKWMA's views will be given due consideration by the Panel.

Yours Faithfully  
for Hong Kong Waste Management Association

Alexi BHANJA  
Chairman