



香港廢物管理學會

Hong Kong Waste Management Association

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Environmental Protection Department

Headquarters

46/F., Revenue Tower

5 Gloucester Road

Wan Chai

Hong Kong

Your Ref : EP 381/11/01

Our Ref : HKWMA/01/2011

BY FAX (2318-1877) & BY MAIL

Attn: Mr. Samson Y.K. Lai

Dear Sirs,

Public Consultation on

Extension of the Environmental Levy Scheme for Plastic Shopping Bags (PSBs)

Thank you for inviting the Hong Kong Waste Management Association (HKWMA) to provide our views and opinions on the proposed Extension of the Environmental Levy for PSBs.

HKWMA is the premier organisation representing professionals in Hong Kong's solid waste management and environmental industries and we take an active interest in all areas represented by our membership.

HKWMA in principle supports the proposed extension of the Environmental Levy Scheme (the Scheme) since:

- (1) A behavioural change of consumers and citizens was evident during the first phase of the Scheme; and
- (2) This behavioural change is a very crucial step forward, paving the way for extending the Producer Responsibility Scheme (PRS) to other (if not all) types of wastes in future, thus ultimately moving towards "reduction at source".

Upon detailed examination of the Consultation Document, we would however like to offer the following observations and opinions:

(1) Have we actually reduced the overall disposal of plastic bags in landfills?

While it is sensible (and can reasonably be expected) that the quantity of PSBs distributed by some 3,100 registered retail outlets during the first phase of the Scheme has decreased quite significantly, we might have created other problems. Some obvious examples include:



- (i) PSBs at, say, supermarkets were traditionally used to carry goods home, and then reused for disposal of waste from households. With the Scheme in place, alternatives, oftentimes thicker and more heavy-duty plastic bags, are used instead for household waste disposal.
- (ii) Woven “environmental” bags (“BYOBs”) were largely distributed and sold instead of PSBs. Are these actually more environmentally friendly than PSBs? What do consumers do with the more-than-enough BYOBs?

This is evident from the **Notes** in **Annex A** on Page 25 of the Consultation Document. Since the implementation of the Scheme in mid-2009, the quantities of “reusable bags” and “plastic garbage bags” disposed of at landfills have actually increased. We opine that there shall be some measures in place to control the distribution of woven “environmental” bags as well.

(2) **Handling of Levies**

While we agree that reporting and remittance of levies by SMEs may be administratively cumbersome, shall we simply consider collecting them at PSB wholesalers and distributors for remittance to government?

Under our proposal, SMEs will pay the levies to these wholesalers and distributors when they buy PSBs for retail purposes (of course, less loss and damages, etc.). The levies will then be charged to the consumers, as a separate fee, when they request PSBs. The consumers will still know “they are paying extra” for the PSBs.

The levies can then be used as a source of funding to further educate the public and sustain behavioural changes.

We believe the quantity of PSB wholesalers and distributors is considerably less than that of individual retail outlets and will be far easier to administer and manage.

Furthermore, this can avoid customers’ solicitations for “waiving” of the levy, as a discount, during negotiation with these SMEs. Otherwise, the prime objective of the Scheme will be jeopardized.

(3) **Increasing the Levies?**

Since the environmental levy on PSBs now appears to be becoming more socially acceptable and supported, an increase of the current levy (at \$0.50 per bag) may be considered. This would further strengthen the direct disincentive objective of the Scheme.

As an example in 2002 when a fixed penalty of \$600 was initially imposed on littering, it was proven so effective that the penalty was increased quickly to \$1,500 in 2003, passing all the amendments and legislative procedures. Although a penalty is different from a levy, the case is to some degree not unprecedented.



It is our Association's view that ultimately the use of plastic bags shall be banned except for food safety and hygienic purposes. However, we also appreciate the fact that any change in policy or in behaviour shall be gradual.

The HKWMA believes that the "Polluter-Pays-Principle" shall ultimately be extended and applied to cover a broader spectrum of wastes (e.g. WEEE, domestic and household wastes). During their initial phases of implementation, supporting measures from government (e.g. incentives, subsidies, charges, fees, etc.) will be crucial to ensure successful start-up of these schemes. We would recommend to the government that these measures to be in place and ready, prior to launching of any related scheme.

Only under this scenario will the future of waste management in Hong Kong become sustainable, both environmentally and financially.

The HKWMA also notes with concern that the proposed programme on implementation of various producer responsibility schemes (e.g. for WEEE and batteries) are considerable behind schedule according to the Policy Framework. We eagerly look forward to receiving government's updated schedule, in a more proactive manner so that previous delay can be caught up.

We trust our views and opinions are well expressed. We welcome further opportunity to participate and provide input during the course of this consultation exercise at a later stage, if any.

We thank you for your effort in the development of a sustainable solid waste management regime, for the betterment of Hong Kong in future and our generations to come.

Yours Faithfully,

Louis Chan
Chairman
Hong Kong Waste Management Association