



Environmental Integrity & Excellence

Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP)
香港合資格環保專業人員學會有限公司 (香港環專會)

**Views and Comments of
the Hong Kong Institute of Qualified Environmental Professionals Limited
on Producer Responsibility Scheme on Plastic Beverage Containers**

Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP) welcomes Government's public consultation on the Producer Responsibility Scheme (PRS) on Plastic Beverage Containers and would like to provide the following comments for consideration.

The Challenges

Plastic pollution is one of the biggest threats to the environment, ecology and humankind. Among others, beverage packaging is an important contributor which pollutes not only our land but also waterways and oceans. It has serious adverse effects that would affect many future generations and very negative impacts on our sustainability.

The current waste management practice for beverage packaging has not been shown to be effective. Despite the previous efforts, Hong Kong disposed of 1.55 billion bottles (i.e., more than 200 bottles per person a year in Hong Kong) or 38,700 tonnes plastic wastes and most of them were not recovered for recycling in 2019. There exists a desperate need for a strong and effective actions to ensure these fully recyclable and valuable materials will not be squandered as waste. It is also vitally important that all beverage importers and manufacturers will be required to share their responsibilities with the same level playing field. In this regard, the HKIQEP welcomes the Government's commitment to tackle the problem by regulatory means.

Mandatory Producer Responsibility Scheme on Plastic Beverage Containers

The HKIQEP supports in principle the establishment of a mandatory Producer Responsibility Scheme on Plastic Beverage Containers (PPRS). Apart from enhancing the recycling of plastic beverage containers and instigate consumers behaviour changes to help increase recycling rates and reduce wastes, it is considered that the PPRS should also aim to:

- (i) ensure beverage producers will shoulder their environmental responsibility to use containers with environment-friendly design/materials and avoid the use of virgin plastics;



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- (ii) promote green consumerism and circular economy.

Scope of Coverage

For the sake of consistency, the HKIQEP agrees that the same definition of “beverage” as in the GPRS could be used to avoid causing confusion to consumers and beverage manufacturers and producers. It is, however, appropriate to have the PPRS as ambitious as possible from the onset to secure rapid and conspicuous increase of recycling rates. It should cover all plastic materials and all different plastic container sizes as far as practicable. Accordingly, the HKIQEP does not consider it appropriate to exclude over-sized containers (i.e., those exceeding) 2L but might accept the Government’s proposal to exclude those with less than 100 mL for practical reasons at the early stage of implementation. As for those plastic containers which are filled and sealed immediately before sale for takeaway at retail outlets on the spot, it would be more appropriate to exempt only those with sizes less than 100 mL for the sake of consistency.

Provision of Rebates under the Proposed PPRS

The HKIQEP supports Government’s proposal to provide a rebate under the proposed PPRS to consumers upon return of plastic beverage containers. Rebates serve not only as an incentive, but also a reminder to the consumers on the need to change their waste disposal behaviour.

The rebate level should be high enough to help increase significantly the recovery rate but not too excessive that may provide temptation to produce fraud or fake labelled containers. Comparing with the rebates provided under other successful schemes such as the Norwegian scheme, it seems that the proposed rebate of 10 cents for the return of a plastic beverage container is a bit too low. The HKIQEP suggests the Government to reconsider the rebate level by referencing to those established in other countries with successful experience. If there exists a high level of unredeemed deposit, it might, to some extent, indicate the failure of the scheme. These unredeemed deposits should be put back to the PPRS to support campaigns and activities that help enhance the recovery rates and plastic waste minimization.

In any case, the Government should make it clear that the rebate does not reflect any of the waste disposal/recycling costs nor environmental damage costs and should let the public and consumers have the full knowledge about these cost that would otherwise be incurred without the PPRS.



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Container Return and Rebate Redemption

Consumer convenience is one of the critical factors to bringing about behavioural change and increasing recycling rates. The HKIQEP supports Government's proposal to require all retailers selling beverages carried in plastic containers to provide take-back and rebate redemption services and considers that return points should be in the most convenient places for consumers to use. The return facilities should be designed to prevent return jam and long processing time that would discourage people from returning the containers. The HKIQEP considers it is appropriate to acquire and make the best use of the existing collection networks which have already been operating by various organizations. Sufficient reverse vending machines should also be provided in residential estates, public transport facilities, public places (including country parks, beaches, sport centres and the vicinity to beverage vending machines), supermarkets, shopping centres, schools and hotels. All major sport event organisers should also be required to provide recovery redemption services.

Recycling Levy under the Proposed PPRS

In line with the polluters pay principle, the HKIQEPs agrees that a recycling levy should be imposed on all beverage manufacturers and importers. It is appropriate that this levy, which is to help discharge some of their environmental responsibilities, will fully cover both the set-up and operational costs of the PPRS. Recognising the desperate need for a PPRS to avoid further deterioration of the plastics pollution, the HKIQEP considers it acceptable if the Government may assume the initial costs and recover them later from the manufacturers and importers after the full implementation of the PPRS. For equity purpose, those manufacturers and importers supplying exempted beverages under the proposed PPRS should also be required to share some of these costs.

Administration of Proposed PPRS

Good administration is another important factor to ensuring success of the PPRS. The HKIQEP considers an independent regulatory body should be appointed as the proposed PRS Operator. This regulatory body should comprise government officials, representatives of manufacturers and importers, qualified environmental professionals, representatives of plastic recycling facilities and other related stakeholders to ensure the rebate system operation and collection of returned containers, which are to be executed by one single Rebate System Administrator (RSA) and multiple Return Network Operators (RNOs), will be managed in a fair,



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reasonable, transparent, and professional manner.

To encourage those environmentally conscious importers and manufacturers, provisions should be made to allow some of the operational costs be waived if they have good performance in recycling high plastic container recovery and using recycled plastics or other more environment-friendly packaging. It is considered that performance-based levy reduction is preferable than allowing reduction simply because arrangements have been made to recycle plastic beverage containers meeting certain environment requirements.

The performance and achievements of the PRS Operator, RSA and RNOs should be monitored and audited by independent environmental professionals and reported to the public at least on an annual basis.

Recycling Facilities

Recycling facilities play a strategic role in ensuring the success of the PPRS. The HKIQEP considers the proposed PPRS should also cover the post-collection treatment of the waste plastic containers and ensure that the recycling services, even though they may be provided by the private recycling sector, will not be interrupted. Adequately stringent licensing requirements should be imposed on recycling facilities for handling waste plastic beverage containers under the proposed PPRS.

Other Issues

The HKIQEP would like to stress that the PPRS would not on its own make the manufacturers and importers change their behaviour on plastic uses. The Government should also strengthen the efforts to encourage innovation and technology advancement to facilitate enhancement of operational capabilities and efficiency of the recycling industry in order to promote their sustainable development. In addition, the Government should actively encourage the manufacturers and importers to use more environment-friendly containers. In this regard, aggressive recycling and reuse targets and the action plans to achieve these targets should be established and periodically reviewed and revised in the light of the actual performance. Those manufacturers and importers fail to achieve the established targets should be penalized and required to pay higher recycling levies and take other appropriate remedial actions. In addition, the HKIQEP supports waste charging which is another driver for increase of recycling rate.

It should also be noted that beverage plastic containers account only a small fraction



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(about 5% in 2019) in all plastic wastes. The Government should also take all possible actions to prevent, reduce and recycling these wastes. The HKIQEP will be glad to provide any professional advice and assistance whenever necessary and appropriate to achieve a more effective plastic waste management.

View Response Form

Appended please find HKIQEP's completed Public Consultation on PPRS Views Response Form.



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Public Consultation on PPRS

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Environmental Protection Department
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Quarry Bay, Hong Kong
Fax: 3121-5761

Annex B: View Response Form

Part I: Basic Information

Which of the following identities are you using to respond to this view response form?

<input checked="" type="checkbox"/> Professional Bodies / Institutions	<input type="checkbox"/> Public Organisations	<input type="checkbox"/> Green Groups
<input type="checkbox"/> Industry Associations	<input type="checkbox"/> Companies	<input type="checkbox"/> Others
Name of Organisations / Companies: <u>The Hong Kong Institute of Qualified Environmental Professional Limited</u>		
<input type="checkbox"/> Individuals		

Email Address: _____

Part II: Consultation Questions

Q1: Do you support introducing a mandatory PRS to enhance the recycling of plastic beverage containers?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q2: Do you agree that the PPRS should cover beverage products within the volume range of 100mL-2L?

<input type="checkbox"/> Strongly Agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neutral	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly Disagree
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Please refer to the comments made in Scope of Coverage

Q3: Do you support the provision of rebate under the proposed PPRS?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q4(a): Do you consider a rebate at 10 cents per container an appropriate level?

<input type="checkbox"/> Strongly Agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neutral	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Strongly Disagree
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Please refer to the comments made in Provision of Rebates under the Proposed PPRS

Q4(b): If not, what should be the minimum rebate level?

<input type="checkbox"/> 5 cents	<input type="checkbox"/> 20 cents	<input type="checkbox"/> 30 cents
<input type="checkbox"/> Others (please specify) :		

Q5: Do you support that relevant retailers (in particular the larger retail stores) should be mandated to provide take-back and rebate redemption services?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q6: What are your preferred types of locations listed below for the take-back and rebate redemption services?
Please accord priority. (1 has the highest priority; 6 has the lowest priority. Please do not repeat.)

Public transport facilities	Public facilities	Shopping centres	Supermarkets	Other relevant retail stores	Residential estates

Others (please specify) :

Please refer to the comments made in Container Return and Rebate Redemption

Q7: Do you support that we should collect the recycling levy at supplier level (i.e. manufacturers and importers) to fund the operation of the PPRS?

Strongly Support Support Neutral Oppose Strongly Oppose

Q8: Do you agree that moderate reduction of recycling levy should be allowed if suppliers have provided proper arrangements to recycle plastic beverage containers meeting certain environmental requirements?

Strongly Agree Agree Neutral Disagree Strongly Disagree

Please refer to the comments made in Administration of Proposed PPRS

Q9: Do you support imposing licensing requirement on recycling facilities for handling the waste plastics collected under the proposed PPRS?

Strongly Support Support Neutral Oppose Strongly Oppose

Q10(a): Do you have any specific suggestion(s) on promoting eco-packaging design?

Q10(b): Do you have any other comments on the PPRS and other plastic-related issues?

-- Thank you for your views --