



香港廢物管理學會

**Hong Kong Waste Management Association**

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**Council for Sustainable Development**

21/F, High Block, Queensway Government Offices

No. 66 Queensway, Admiralty

Hong Kong

By email ([comments@susdev.org.hk](mailto:comments@susdev.org.hk)) only

Attn: **Dr LAM Ching-choi** SBS, JP

Dear Dr Lam,

**Public Engagement on Control of Single-Use Plastics**

In response to the said Public Engagement exercise conducted by the Council for Sustainable Development (**SDC**) on the Control of Single-Use Plastics, the Hong Kong Waste Management Association (**HKWMA**) is pleased to provide our written opinions and suggestions.

Established in 1994, HKWMA is a not-for-profit premier professional organization representing professionals in Hong Kong's solid waste management and environmental industries. For over a quarter of a century, we take an active interest in all areas represented by our membership and topics of our ambit.

**Single-Use Plastics** (SUPs) typically relate to the use of plastic products that are used once and then disposed. These plastics are typically derived from fossil fuel-based products or derived polymers that require intensive refining and manufacturing, resulting in greenhouse gas emissions in their manufacturing. These product SUPs are typically of low and mixed grade, and often cost more to recover and recycle than to create from their virgin precursors. This further exacerbates the single-use culture. Evidently, the fast pace of living in Hong Kong is not helping either. This approach is clearly not sustainable, and HKWMA fully supports the controls and interventions to mitigate the pollution created by SUPs.

Single-use products often end up as litter and plastic pollution of our countryside, seas and oceans has grown to intolerable levels and forms. Plastic tides have been experienced at Cheung Sha and many locations

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across Hong Kong in the last few decades, and the situation is only worsening in our Country Parks. Decades of inaction has resulted in a critical environmental issue. We are now witnessing the decomposition of single use plastics transitioning into microplastics that possess the ability to enter the ecology and the food chain. Aside from the dangers plastic pollution imposes to wildlife and our own health, the consumption and disposal behaviours from single-use plastics are clearly unsustainable and must be changed.

### **General**

The Consultation Document identifies all the typical types of single-use plastics from products and retail packaging through plastic cutlery and beverage containers. We support specific actions and policies being applied to each identified form of single-use plastic, as shown in the attached “**Annex III - Views Collection Form**” (with remarks).

The “**polluter pays**” principle has long been the guiding principle in sustainable waste management. Actions that make the cost to recycle and to re-use cheaper than the cost of creating from virgin product will encourage recycling, re-use and recovery behaviours. We have already witnessed how simple interventions of removing plastic drinking straws from circulation, shifts behaviour without creating any inconvenience to consumers. Society is proven to be more than capable of adapting to changes, and the Government should be striving to set higher benchmarks and standards that force and accelerate behavioural change since in many instances, this approach often yields lasting and substantive improvements towards reducing or eliminating single-use plastic waste.

### **“Banning” vs. “Regulatory” Measures**

The European Union Directive 2019/904 on single use plastics was adopted in June 2019 and comprises a combination of outright bans on certain products, extended producer responsibility obligations, product design requirements, labelling to promote recyclability and enhanced education and awareness.

Reference to these guidelines will support Hong Kong in setting policies and directives with respect to SUPs, although there needs to be concise definitions on SUPs and whether the products derived containing natural or chemically modified polymers, and whether products are partly or wholly made from plastics. Precise definitions will be necessary so that the scope of any guidance, policies, and regulations can be clearly interpreted and apprehended by the industry and citizens to identify what products are applicable or exempted.

Where the economics of recycling and recovery are not advantageous, we are supportive of complete bans on certain low grade plastics, especially if they are difficult to recycle and affordable alternatives are available. “Voluntary” measures are unlikely to be successful for the subject of consultation.



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### **Labelling and Identification of Plastics**

Given the complexity and multitude of plastic variants that are in circulation, an unified labelling system that enables all products to be clearly and easily identified by the general public for their recyclability and the provision of source-separated recycling collections systems will encourage participation and yield a source of clean recyclable material for industry to recover and re-use/re-purpose plastic into other products. The combination of labelling and source separated waste collection are fundamental to support recycling and a circular economy, and to provide the public with confidence that materials are being recycled responsibly. A simple QR code with a simple App may do.

In parallel to outright bans and extended producer responsibility schemes, initiatives that raise awareness towards reducing consumption and promoting affordable alternatives will target reduction of single-use plastic at source.

### **“Environmental-Friendly” Bags?**

The Consultation Document has rightfully pointed out that 21% of the wastes deposited at landfills in 2019 were “**Plastics**”. However, this main category of “Plastics” comprises several sub-categories, within which “**Plastic bags**” comprised almost 7%, with “**Others**” making up another 10% and the balance of items (mainly plastic bottles and dining wares) making up the balance (4%). Every little bit counts and HKWMA is not implying that plastic bottles and dining wares shall be ignored, and in fact their potential environmental hazards cannot be represented simply by their weights or volumes.

However, focusing on “**Plastic bags**”, the Consultant Document does not seem to have touched upon the distribution or sales of the so-called “**Environmental-Friendly**” bags, which evolved and entered the consumer market as a *so-perceived* “environmentally friendly alternative” since the very early inception stage of the PSB levy in 2009, being sold at similar or slightly higher price than the PSB levy itself. Regardless of woven or non-woven types, these bags are mostly PP (polypropylene) or similar petroleum-based, polymer-derived products. If properly maintained, they can rightfully be reusable for an extended period of time.

Unfortunately, HKWMA opines that a (significant) portion of these bags have been disposed at landfills, making up part of the 7% figure reported in 2019. The distribution and sales these bags shall be further looked into and controlled to revert to their initial objective – being reusable and being better alternatives to traditional PSBs.

“**Others**”, as defined in the referenced EPD document, refers to “*Other plastics waste includes transparent stretch film for packaging, toys, off-cuts, scrap, etc.*”. This 10% contribution shall also be examined further and controlled, though this will likely encroach the commercial / industrial sectors on top of the currently focused consumer sector, but is inevitable and does form an integral part of the overall management regime.



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## **Communication and Facilitation**

***Quantification and Regular Reporting:*** There can be little dispute that the general public momentum of “going green” has considerably increased in the past decade. HKWMA opines that there has to be an open, easy-to-understand, accountable and auditing reporting system in place managed by a single government bureau / department (quite sensibly ENB or EPD). Bluntly put, “*you cannot manage what you cannot measure*”. On the “intangible” side, the citizens’ “green” efforts can be quantified and realized with this system. At the same time and very rightfully, the Government’s dedication in this regard can also be properly honoured.

***Information Platform:*** Alongside with the above reporting system, the Government shall also consider setting up an Information Platform, sharing up-to-date substitute / alternative products / materials available in the fast-moving market that are more environmentally friendly and sustainable. Quite understandably, some of these alternatives might be more expensive amid the smaller volume of use hence cannot drive the costs down, yet their benefits can be illustrated through Life Cycle Analysis (LCA) or similar common tools. The general public will then have a “standard” to access different alternatives and be educated to change their consumer behaviour in a more informed and scientific manner. Cost does matter but is not the sole consideration for all consumers. Everyone shall live in their own unique and preferred style, and we shall make “choices” available to them and simply let them decide.

In closing, HKWMA supports the initiatives in the Consultation Document, but would challenge the Government to set more ambitious targets in tackling single-use plastics. The “best time” to act has long passed. We are now “mitigating damages” rather than “seeking full recovery”.

We trust our views and opinions are well expressed, and we welcome further opportunity to participate and provide input related to the subject.

We thank you for your effort towards the betterment of Hong Kong in future and our generations to come.

Yours Faithfully,



**Ir Norman CHENG**  
Chairman

## Annex III - Views Collection Form

Which of the following capacity are you using to respond to this views collection 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>Hong Kong Waste Management Association</u>		
<input type="checkbox"/> Individuals		

Email Address: chairperson@hongkongwma.org.hk

Question (1): How concerned are you about each of the following issues with single-use plastics?

**Answer:**

Issues	Extent of concern (1 - Not concern, 5 - very concern)					Don't know
	1	2	3	4	5	
Single-use plastics are littered in the natural environment, which causes pollution and harm to wildlife	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Use of single-use plastics increases carbon footprint and poses climate change hazard.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Single-use plastics are difficult to recycle and take up valuable landfill space.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The society's over-reliance on single-use plastics promotes a wasteful culture.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Annex III - Views Collection Form

Question (2): What types of product should be put under control? For those that should be controlled, should actions be taken in short-term (within 3 years) or medium-term (3 – 5 years)? What should be the approach for controlling them?

[Remark to readers: for more examples on single-use plastic product, please refer to p.7 of this public engagement document]

### Answer:

Single-use plastic product	Need to control					No need to control
	Short-term / medium-term action? (Please ✓)		Approach (Please ✓) (Can choose more than one option)			
	Short-term	Medium-term	Total ban	Regulatory measure	Voluntary measure	
<b>Local product packaging</b> e.g. box for containing fruit / eggs <b>There has to be other sturdy, robust, yet compatible and re-usable alternatives.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Local retail packaging</b> e.g. foam tray and platter for fresh fruit, meat, fish or poultry <b>Again, these are necessary, but exist other re-usable alternatives.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Local packaging for logistics and online shopping</b> , e.g. plastic wrap and bubble wrap <b>Use recycled wood / paper alternatives. Coat them for water-proofing.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Festival and celebration products</b> , e.g. inflatable cheer stick, glow stick, cutlery, stirrer, straw and plate <b>These are solely for "convenience", and shall be banned.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Toiletries distributed by hotels</b> , e.g. showering product in small bottle <b>For an hygienic impression, these should be kept, but cleaned &amp; reused.</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Others</b> , including - <b>umbrella bag</b> <b>Umbrella bags are mainly for "convenience" (or "insurance" at times), and shall be banned.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- <b>supplementary tool sold together with a product for its usage / consumption</b> , such as plastic straw attached to a paper beverage carton <b>Oftentimes, these straws fall off the cartons before consumer consumption. Have better design on the carton without the need for straw.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- <b>other toiletries like plastic stemmed cotton buds</b> <b>Can become an "on request" item by guests.</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- <b>miscellaneous items such as signage for meetings, conventions and exhibitions</b> <b>All signage, booklets, posters, flyers, backdrops, etc. shall go electronic only.</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- <b>others</b> (please specify _____)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Annex III - Views Collection Form

Question (3): Enhancing existing measure - the Plastic Shopping Bag Charging Scheme

(3.1): Do you agree that the current exemption for Plastic Shopping Bag (PSB) carrying frozen/ chilled foodstuff in airtight packaging can be removed?

**You don't go out for frozen / chilled foodstuff "randomly", but usually plan ahead so the same can go into the fridge ASAP. There is no reason why someone cannot bring a bag for these.**

Answer:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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(3.2): Do you agree that foodstuff already fully wrapped by non-airtight packaging should not be provided with free PSB?

**If the foodstuff does not need to be air-tight due to its inherent nature, why provide other bag when it is already fully wrapped?**

Answer:

**If it shall be air-tight and it is not, it shall not be sold in the first place.**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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(3.3): Do you agree only ONE PSB should be exempted for carrying foodstuff not fully wrapped by any packaging (e.g. bread sold at bakeries, fruits sold at wet market)?

**Habits needs to change. Previously we get 5 bags from a bakery and 10 bags after shopping at the market. We do not object giving 1 PSB as an exemption for now (subject to how to define - per outlet? per market?), but eventually it shall go to 0.**

Answer:

<input type="checkbox"/> Yes, I agree only <u>ONE</u> exempted PSB is needed.	<input type="checkbox"/> No, we should not limit the number of exempted PSB to be provided.	<input checked="" type="checkbox"/> No, I consider <u>0</u> (please specify the number) exempted PSBs should be provided.
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(3.4): What is the minimum charging level that can discourage you from using a PSB (HKD)?

**The higher the better, but this shall give considerations to the charge rate on MSW charging. Further, we need to have certain control over those so-called "environmental-friendly" / "woven" bags as well, and sell them at a price.**

Answer:

<input type="checkbox"/> \$1	<input type="checkbox"/> \$1.5	<input type="checkbox"/> \$2	<input checked="" type="checkbox"/> others: <u>\$5</u> (please specify)
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Question (4): Do you agree that, if more information on the recyclability and percentage of recycled content of a single-use plastic product is provided by the manufacturer, it would be helpful for consumers to make an informed purchase decision?

**Yes of course, just like food safety information and health parameters. However, the Government shall also take the lead in informing the citizens the outcome of such effort, in an open, transparent, easy-to-understand and accountable manner.**

Answer:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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## Annex III - Views Collection Form

Question (5): Do you agree there is a need to develop a platform for sharing information on plastic alternatives among different stakeholders (including businesses, material suppliers and consumers)?

**Answer:**

**ENB shall take the lead on this.**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Question (6): When there are different brands available for the same type of merchandise. Which of the following green considerations would affect your choice?

**Answer:**

Considerations	Would it affect your choice				
	Strongly affected	Slightly affected	Not very affected	Not at all affected	Can't say/ don't know
Whether the product can be re-used (e.g. reusable metal cutlery vs single-use plastic cutlery for parties, reusable umbrella bags vs disposable umbrella bags)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whether "green material" is used (e.g. products and packaging with recycled content)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The brand's "corporate environmental responsibility" (e.g. the brand offers "take-back" service for the collection and subsequent recycling of their products)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whether the product is not over-packaged	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question (7): One of the reasons that plastics are so commonly used is their comparatively cheap price. Replacing plastics by non-plastic / reusable alternatives may drive up the costs of the products. To reduce the use of single-use plastics, are you willing to pay more? If yes, assuming that a single-use plastic item costs \$10, how much are you willing to pay for the same product made from non-plastic / reusable alternatives?

**Answer:**

**"Expensive" or "cheap" are relative terms, and are only relevant when there are "choices". When there is no choice to opt for single-use plastic, this is not relevant.**

<input type="checkbox"/> less than \$0.5 (i.e. less than 5% of product price)	<input type="checkbox"/> \$0.5 – 1 (i.e. 5 – 10% of product price)	<input type="checkbox"/> \$1.1 – 1.5 (i.e. 11 – 15% of product price)	<input checked="" type="checkbox"/> more than \$1.5 (i.e. more than 15% of product price)
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**MSW Charging Scheme and "Economy of Scale" will also drive the costs of the non-plastic / reusable alternatives down. ( End )**