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(Public Engagement on Control of Single-use Plastics)

Council for Sustainable Development,

21/F, High Block,

Queensway Government Offices,

No. 66 Queensway,

Hong Kong

Email: comments@susdev.org.hk

Submission on the Public Engagement on Control of Single-use Plastics Views from Business Environment Council Limited 商界環保協會有限公司

Over the last 29 years, Business Environment Council Limited 商界環保協會有限公司 (“BEC”) has played a leading role in advocating the business case for environmental excellence, given the importance of sustainable development to Hong Kong. Our members are committed to actively engage with the HKSAR Government (“the Government”) to help develop a supporting policy framework as well as impactful implementation in respect of environmental protection and sustainability.

Views expressed in this submission are those of BEC, in line with BEC’s Mission and Vision as well as policy position on relevant issues, but may not necessarily be the same as the views of each individual member. BEC is an independent charitable membership organisation comprising over 200 member companies from Hong Kong’s major holding companies to small and medium-sized enterprises.

1. Background

1.1. Plastics pose a heavy burden to our landfills and the natural environment. In 2019, plastics accounted for 2,300 tonnes per day or about 21%¹ of municipal solid waste (MSW) disposed at landfills in Hong Kong, which was the third-largest constituent after putrescible waste and paper waste. Plastics not only remain in the environment for a long time and threaten the ecosystem, but their entire product life cycle from crude oil extraction to post-disposal treatment also generated greenhouse gases that contribute to climate change. To deal with the plastic waste crisis, considerable attention must be given to single-use plastics as being the main cause of plastic pollution.

1.2. BEC is strongly concerned about plastic waste and is aware of the following issues related to single-use plastics:

¹ <https://www.wastereduction.gov.hk/sites/default/files/msw2019.pdf>

- Single-use plastics are littered in the natural environment, which causes pollution and harm to wildlife
- The use of single-use plastics increases carbon footprint and poses climate change hazard
- Single-use plastics are difficult to recycle and take up valuable landfill space
- Society's over-reliance on single-use plastics promotes a wasteful culture

1.3. Given the urgent need to eliminate plastic at source and tackle waste challenges in Hong Kong, BEC supports in principle the control on single-use plastic items² progressively, with a clear and ambitious timeline for each phase of regulations.

2. What and How to Control?

Types of products to put under control

2.1. Recognising the environmentally or value-recovery problematic nature of single-use plastics, BEC strongly supports the control of all types of single-use plastic products³ listed in the public engagement document. Most of these single-use plastic products do not perform an essential function such as accessibility, health and safety or security. Viable alternatives also exist and are readily available in the market.

Control timeline

2.2. BEC urges the Government to take actions on regulating various types of single-use plastic products progressively, with clear targets and timelines set to get the industry better prepared and drive the development and supplies of sustainable alternatives. Short-term actions could be taken to first manage plastic items that local businesses have direct control over, for example the provision of umbrella bags and local packaging for logistics and online shopping. For those items such as product packaging for fresh food items, actions could be taken in the medium term to give importers and retailers sufficient time to engage suppliers and look for suitable alternatives. It is also important to give customers ample time to get accustomed to new practices due to control, such as accepting there will be no packaging for fresh food items and they must bring reusable containers to shop as an example.

² Single-use plastic items covered in this public engagement do not include beverage containers.

³ Including local product packaging, local retail packaging, local packaging for logistics and online shopping, festival and celebration products, toiletries distributed by hotels and others.

Control management approach

- 2.3. An integrated management approach is recommended to eliminate plastic pollution, achieve zero landfill and support the circular economy in Hong Kong. Clear management objectives should be set to guide the selection of appropriate instruments. With a broad range of regulatory and voluntary instruments available, choosing the right management actions for each type of plastic product and in different market segments will require careful considerations and special handling on various factors such as environmental effectiveness, economic efficiency, business operations, and health and safety.
- 2.4. For example, BEC suggests that items such as polystyrene products and umbrella bags should be banned as soon as possible as they are non-essential and/or there are readily affordable and reusable alternatives.
- 2.5. Some items should be regulated when there are viable alternatives in the market. BEC supports the provision of voluntary measures / incentives to help the public in the adoption of reusable alternatives and to support affected business sectors to make a smooth transition ahead of the control (i.e. advisory support, improvement of product design, enhancement of recycling, promotion of use of alternatives, public education and publicity activities, etc.). Perhaps the revenue generated from the plastic shopping bag levy could be used to support these measures / incentives.

3. Enhancement of the Plastic Shopping Bag (PSB) Charging Scheme

- 3.1. BEC sees the need to review and enhance the current PSB Charging Scheme in ensuring its effectiveness in waste reduction. While there was a significant drop in the number of plastic bags being disposed of in Hong Kong compared to figures before the full implementation of the Charging Scheme in 2015, the number has been increasing every year since then with a slight decrease in 2019. The Government should therefore review and reconsider the current exemption arrangement and the charging level.
- 3.2. BEC agrees that types of exemption should be tightened and the current exemption for PSB carrying frozen or chilled foodstuff in airtight packaging and foodstuff already fully wrapped by non-airtight packaging should be removed to avoid multiple layers of packaging. The number of exempted PSB for carrying foodstuff not fully wrapped by any packaging can also be limited to reduce unnecessary packaging use. The Government should work with the relevant business sectors in developing and providing reusable options to address food safety and hygiene needs. Public

awareness and education campaigns need to be strengthened to complement the promotion of the tightened exemptions.

- 3.3. As the current HK\$0.5 charge per PSB has been implemented for several years, it may no longer provide sufficient disincentive to the public due to cost absorption and inflation. There is a need to increase the levy in ensuring the effectiveness of the Charging Scheme. The level of increase should be reasonable but high enough to reduce PSB consumption. As such, BEC supports that the minimum charging level of a PSB should be set at HK\$1 or higher as a starting point under the review. Transparency on the utilisation of revenue generated from the Charging Scheme should also be improved to strengthen public acceptance.
- 3.4. In the medium to long term, BEC argues that the Government should look for ways to ultimately remove the use of plastic bags as an option and offer a sustainable solution instead, such as replacing plastic bags with recycled paper bags, or better still, replacing with reusable alternatives.

4. Provision of Information

- 4.1. BEC supports the provision of information by manufacturers / importers on the recyclability in Hong Kong and percentage of recycled content of a single-use plastic product to avoid confusion and ambiguity. It empowers and supports consumers not only in selecting environmentally friendly products, but also in proper waste handling and recycling. The delivery of information can be achieved in different forms and approaches, for example, by on-package labelling or using electronic means such as QR codes. Besides, the information provided on the label should be presented in a standardised / universal format and verified by the Government / a government-appointed agency.
- 4.2. BEC also supports the development of a platform for sharing information on plastic alternatives among different stakeholders, including businesses, material suppliers and consumers. A centralised platform would help facilitate information sharing and market changes. Collaboration between government departments and the business sector is needed, with the Government taking the lead, to ensure proper management of the platform and dissemination of accurate information.

5. Switching to plastic alternatives

- 5.1. Plastics are cheap, lightweight and adaptable. Replacing plastics with non-plastic or reusable options may therefore impact cost, convenience and acceptance of the products. Producers or consumers may be under

the impression they need to pay more for sustainable products, but in fact they are already paying for the current costs and impacts, short- and long-term, of plastic use and pollution hidden from consumers and being born by the environment and public purse. Both producers and consumers must understand the true costs and impacts of plastics use and waste, and with the knowledge they should then react by taking producer responsibility and changing consumer behaviour, respectively.

- 5.2. Other than cost, switching to non-plastic alternatives would also raise the issue of scrutinising the environmental performance, quality and safety of the materials. It is necessary to step up food contact material testing, certification and registration in Hong Kong, and this information should be effectively communicated to manufacturers, traders and consumers (see Section 4 above).
- 5.3. More efforts are required by the Government, the business sector and the general public in supporting and promoting the adoption of reusable alternatives. This includes, but is not limited to, supporting and practising sustainable product designs, investing in recovery and recycling infrastructures that accept alternative materials, fostering a plastic-free culture through public education and campaigns, and ultimately the promotion and development of the circular economy.
- 5.4. While this public engagement focuses on the control of single-use plastics, BEC reiterates that reducing the consumption of single-use products made of all types of materials is key to achieving waste avoidance and reduction at source. An integrated waste management approach is needed to regulate the use of all single-use items and prevent a shift to the use of materials that are not regulated.

Enquiries

For queries related to this submission, please contact our Chief Executive Officer, Mr Adam Koo at adamkoo@bec.org.hk

Yours sincerely,



Richard Lancaster
Chairman
Business Environment Council Limited