



11 April, 2019

Mr. Wong Kam-sing, JP
Secretary for the Environment
Environment Bureau
16/F., East Wing, Central Government Offices,
2 Tim Mei Avenue, Hong Kong

**Exchange Forum on the Proposed Producer Responsibility Scheme on
Plastic Beverage Containers (PPRS)**

Dear Mr. Wong,

I would like to thank you very much for inviting representatives of the Hong Kong Retail Management Association to attend the first meeting of the Exchange Forum on the Proposed Producer Responsibility Scheme on Plastic Beverage Containers (PPRS) on 27 March, 2019.

We appreciate the efforts of the Environmental Protection Department (EPD) to introduce the overseas experience and possible regulatory framework of the PPRS, and the opportunity of this platform for stakeholders to exchange our views. Among all the key issues discussed, we would like to highlight in the following elaborations our views and concerns over the proposed mandatory responsibilities to be imposed on retailers, in particular, on the suggestion that retailers should accept return of plastic beverage containers and refund the deposits.

1

I. The Use of Plastic in Beverage Containers

1. Just like any other industrial resources, plastic itself is a practical and useful material. Currently, plastics still have certain advantages in terms of portability and durability. While exploring plastic beverage packaging alternatives in the market, our members face different challenges as stated below :
 - (i) Glass: There are concerns over the risks and safety issue involved in product display, as most shops are usually packed with customers, if the glass bottles drop from the shelves, it could be quite dangerous. Glass containers are also not very suitable for consumption at schools or sports grounds for safety reasons.
 - (ii) Carton: It is not transparent, but many customers actually prefer to be able to “see” the content inside the container when they purchase fresh products. Therefore, it’s more about the customer acceptance level and awareness on green packaging. If they are fully educated on the environmental benefits, there might be changes in their consumption behavior.
2. Due to the above reasons, it is not totally viable to use glass or carton packaging to replace all plastic beverage containers. To this end, we sincerely urge the government to invest more on realizing Hong Kong’s industry upgrade (in production technology and packaging development) for bottlers. We need the coordinated support from relevant government bodies, such as Innovation and Technology Commission, and Trade and Industry Department, for providing resources, guidance and intelligence on the development of innovative and viable packaging solutions to reduce plastic waste.

3. We view that instead of putting the burden or even “blame” on bottlers as sources of plastic waste, a key issue to address is how the recycling trade can effectively recycle and turn the plastic waste into valuable material again. However, it is apparent that there are a number of obstacles to the development of a sustainable environmental industry in Hong Kong, such as insufficient community education and weak government support; as a result, the plastic waste issue is the outcome of a sub-standard ecosystem.

II. Practical Considerations: Storage, Hygiene and Logistics Issues

4. With shop rent being a very critical factor to business operation, retailers are having concerns over the storage of returned plastic containers at the shops in view of the small size of the shops in Hong Kong in general.
6. This will also lead to hygiene issue that might arise from bottle storage (if they are not cleaned properly), and if the refunds are to be processed where check-out of food or related goods are happening at the same time.
7. We do not see relying solely on retailers to accept the return of plastic containers is a viable option. We suggest the Government to take the lead to seek support from all stakeholders, including landlords and property owners of shopping malls, housing estates, and commercial buildings, as well as public transport network to jointly allocate their space to provide adequate and suitable collection points.
8. For example, if MTR could provide an area for tenants to store recycled plastic bottles, or place RVMs along its vast network with proper collection procedures to follow, plastic bottles recycling could be done more effectively by consumers and tenants. We believe a holistic support system would have to be government-led in order to function properly.



HKRMA

III. Manpower Shortage and Deteriorating Service Standards

9. The retail sector is facing acute manpower shortage for a long time; the proposed manual arrangements would likely add significant time to queuing and impacting other customers, as well as additional deposit and handling costs to the end customers.
10. We also have concerns on how the recyclers could collect the bottles from the stores on a timely schedule and without affecting the stores' daily business operation.

IV. Public Education on the Negative Impact of Plastic Waste

11. In order to make the PPRS to serve the original objective of reducing plastic waste at source, we strongly urge the Government to put more emphasis on public education to highlight the grave damage of plastic waste to our environment, so as to encourage consumers to change their behaviour through proper recycling.

We understand that the Government will consult the public on the PPRS later this year; we would be most grateful if the EPD could share with us the proposed regulatory framework in advance so that we can seek our members' views and provide your department with practical suggestions.

We look forward to having another fruitful exchange with you and your team if required.

Yours sincerely,

Annie Yau Tse
Chairman