



Hong Kong Retail Management Association's Views on Public Consultation:
A New Producer Responsibility Scheme on Glass Beverage Bottles

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The Hong Kong Retail Management Association (HKRMA) appreciates the Government's green initiatives to protect our environment. However, HKRMA has the following concerns on the new Producer Responsibility Scheme ("PRS") on Glass Beverage Bottles ("GBB"):

- (1) whether the proposed recycling fee imposed on the suppliers, i.e. the importers and distributors, would be passed on to and be shouldered by the retailers and consumers, which might push up the selling price of beverage products and eventually raise the taxable retail value of retailers.
- (2) whether the recycling fee, supposed to be on mandatory basis, could be regulated and managed at a reasonable level;
- (3) whether the request on providing glass bottle recycling information at the retail outlets would impose excessive operating costs on retailers;
- (4) whether any recycle facilities that may be placed close to the vicinity of the retail outlets may create hygienic or safety issues;
- (5) whether the recycle contractor would regularly update retailers on the information on recycle facility; and
- (6) whether the Government would consider offering more incentives to encourage both the public and recycle contractor to recycle GBB.

HKRMA emphasizes that the key leading to the success of the PRS on GBB would be a practical incentive scheme provided to end users to encourage recycling of glass bottles. The Government could propose such an incentive scheme in future consultation or include the scheme as a requirement in the tender for recycle contractor.

HKRMA urges the Government to address the above-mentioned concerns of the retail industry, and provide a detailed plan for the implementation of the PRS after conducting a thorough consultation with the trade, in particular on the level of recycling fee and the cost implication to importers, distributors and retailers.



Regarding the consultation questions listed in the consultation document, HKRMA would like to provide the following responses:

1. Do you agree that we should now proceed to pursue mandatory PRS on glass beverage bottles as a priority among different types of glass bottles, because this removes the largest number of glass bottles?

HKRMA understands Government's rationale in proposing to implement the PRS on GBB first. However, in light of the various types of drinks that contain semi-solid food in the market, such as bottled bird's nest and aloe vera juice, we urge the Government to provide a precise and clear definition on "glass beverage bottles" to avoid ambiguities in the execution.

2. At present, a person who carries out a food importation or distribution business must be registered under the Food Safety Ordinance (Cap 612). Do you agree that the recycling fee for the PRS should be collected from those registered food importers and distributors who import or distribute glass-bottled beverages for local consumption? Who else would also be in the position to serve as the anchor point for the fee?

Considering the large number of GBB retailers compared to that of GBB importers and distributors, HKRMA believes collecting the recycle fee from registered importers/distributors is a practical option in terms of administration, enforcement and cost. However, the retail industry concerns that these measures may push up the cost and hence the price of GBB. The Government should inform the public of such possibility and ensure that the public is aware of the additional cost consumer has to bear.

3. For ordinary consumers, do you find it helpful if a beverage retailer could advise you on how to participate in glass bottle recycling? For beverage retailers, are there practical difficulties that would prevent you from providing recycling-related information to consumers?



The Government should take the leading role to encourage the public to participate in the GBB recycling scheme. As good corporate citizen, retailers are willing to play a supporting role to provide consumers with recycling information in a simple and low-cost manner on a voluntary basis. The information may be included in product promotion posters or similar. However, it is neither practical nor reasonable to include such information on product labels or take up expensive space within a retail outlet. Retailers should also take no responsibility on the content of the recycling information provided to consumers, which is to be supplied by the recycling contractor.

4. As a matter of principle, we should ensure that any end-of-life products under a PRS are efficiently collected for environmentally sound recycling processes to produce reusable materials. Do you agree that new licensing control for the processing of waste glass beverage could contribute to the accomplishment of the said objective of the PRS?

HKRMA agrees that the creation of a demand for waste glass products that can be used in Hong Kong such as “construction bricks” is a good practical approach.

5. Do you agree that beverage suppliers with a satisfactory corporate reuse/recycling plan could be exempted from the payment of a recycling fee? Are you aware of any other stakeholders who should also be entitled to similar exemption?

We agree that beverage suppliers with their own established corporate reuse/recycling plans should be treated in such a way that encourages other beverage suppliers to do the same. Exempting them from payment would seem to be a good approach.



6. Do you agree that a landfill ban on glass beverage bottles should be introduced? If yes, how it should be refined for better implementation?

Waste glass must be channeled toward recycling uses through consumer education and suitable waste glass collection centres provided by the Government or its contractors. A complete ban in landfills will not be practical to implement and may lead to an increase in the ‘fly tipping’ of glass which is far worse for the environment than putting it in the land fill. Besides, the Government or the recycling contractor may consider introducing an incentive scheme by offering rewards to encourage the public to take the GBB to recycle contractor.

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