



## **Hong Kong Retail Management Association**

### **Submission on the Public Consultation on Regulation of Disposable Plastic Tableware**

**1 September 2021**

The Hong Kong Retail Management Association (HKRMA) supports the Government's initiative to gradually reduce the use of disposable plastic tableware in Hong Kong as long as viable alternatives are available. The HKRMA would like to present members' views on the Government's proposed "Scheme on Regulation of Disposable Plastic Tableware" (the Scheme) in the following deliberations.

#### **I. A Comprehensive and Holistic Approach**

1. It is understandable that regulation would be an effective tool to control the use of disposable plastic tableware. However, we suggest the Government to take a more comprehensive and holistic approach to achieve genuine environmental benefits, while balancing and fulfilling the need of catering industry. It is of paramount importance that the Government should give thorough considerations on the availability of viable alternatives for transition.
2. As the proposed regulation posed obvious challenges to the catering industry, we suggest the Government to provide subsidies to restaurants and/or suppliers to alleviate their burden and to make the Scheme more financially viable.
3. On supply side, we urge the Government to take a more proactive stance to support suppliers, catering industry, NGOs and academia to conduct R&D on viable alternatives to replace disposable plastic tableware with an affordable cost.

## **II. Availability of Viable Alternatives**

4. While recognizing how plastic can impact our environment, the Government should first gauge whether viable alternatives are available in the market and whether the supply is sufficient to cover the demand, so that the catering industry could abide to the Government's Scheme.
5. In particular, we would like to highlight the challenges of packaging of liquids, which includes but not limited to hot and cold drinks, soup, and noodles in soup.
6. The Scheme suggested that oxo-degradable and biodegradable plastic tableware would be regulated. While we agree with a ban on oxo-degradable plastics, however, a ban on biodegradable plastics would mean that only very limited materials options could be used as alternatives.
7. The switch to paper / plant-fiber tableware, such as bagasse, might not be viable, as the form of this material is not sturdy enough for delivery and will have leakage issues.
8. Furthermore, paper / plant-fibre food containers and container covers, cups and lids usually have an inner water-proofing coating made of different plastic-based or biodegradable materials, such as PE, PLA, etc, which would be regulated under the Scheme as well.
9. If all inner coatings are not allowed, the industry will have no viable alternatives, especially for food containers and container covers, as well as cups and lids, which would be an issue for carrying liquid-based food, such as congee, curry, soup and also for drinks.
10. In this context, the use of plates, cups and lids, food containers and container covers that are in non-EPS (non-expanded polystyrene) form is generally not regulated across oversea markets, due to the absence of truly plastic-free alternatives (i.e. bio-plastic / plastic lined material included). Therefore, we urge the Government not to regulate these tableware types until it is practical and affordable to do so in

Hong Kong.

11. Besides environmental soundness, we would like to highlight that the viable alternatives should fulfill the following criterion:
  - (a) **Safe** – the alternatives should be made with materials that have the ability to prevent leakage, and is safe when applied with heat.
  - (b) **Functional** – the alternatives should have an acceptable level of sturdiness, and can provide certain level of temperature insulation.
  - (c) **Affordable** – the cost of switching to viable alternatives will inevitably lead to an increase in cost for takeaways, which will eventually be passed onto the customers. The Government should make a balanced decision considering the affordability of the general public and environmental consequence.
12. The use of 100% recycled plastic should be encouraged as an alternative and should be exempted from any ban, so as to create downstream demand for recycled material that ultimately could support the city’s development of a circular economy.

### **III. The Sale of Disposable EPS Tableware**

13. We agree with the Government’s proposal to ban the sale of disposable EPS tableware to local end-consumers, as this could prevent any gaps in the ultimate objective of reducing its use.

### **IV. The Implementation Timeline**

14. Similar to the practices of the Mainland and other overseas governments, we urge the Government to implement the Scheme in a progressive manner, and the timeline should be considered in conjunction with the availability of viable alternatives.

15. We suggest the Government to include an evaluation period after the completion of the phasing out of the EPS disposable tableware under Phase 1, so as to gauge the impact and to measure the practicality of the viable alternatives.
16. Without viable alternatives, the ban should not be applied to all types of disposable tableware, including the biodegradable plastic tableware.

## **V. Exclusions**

17. We agree with the two proposed exclusions under the Scheme, including the provision of disposable plastic straws by catering premises on request by persons with special health needs or physical conditions, and the exclusion of disposable plastic tableware that forms part of pre-packaged food products prepared outside catering premise.

## **VI. Other Suggestions**

18. It is critical for the Government to provide more detailed information about what materials are acceptable or unacceptable to be used under different phases of the Scheme, for example, whether it is acceptable to use the current paper straws in the market which contains PE coating.
19. We suggest the Government to explore whether there are industrial composting facilities developed in the Greater Bay Area which Hong Kong could leverage for the recycling of biodegradable plastic.

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