

**Hong Kong Retail Management Association**  
**Feedback to Establishment of a Common Legislative Framework for**  
**Producer Responsibility Schemes**  
**14 December 2023**

The Hong Kong Retail Management Association (“HKRMA”) supports the Government’s initiatives to build a greener Hong Kong. Over the years, the community has achieved significant success in this regard. The HKRMA would like to present members’ views on the proposal by the Environmental Protection Department for the establishment of a Common Legislative Framework for Producer Responsibility Schemes (PRS), including the introduction of the PRS on plastic beverage containers and beverage cartons, which was discussed at a Panel on Environmental Affairs meeting under the Legislative Council in late-November 2023. HKRMA’s key concerns over the proposal are as follows:

1. Clarification is needed on the definition of “beverage cartons”, particularly whether “beverage cartons” refers to cartons made of any material, as well as on the distinction between “plastic beverage containers” and refillable plastic containers (e.g., carboys).
2. Information is needed on the circumstances that will necessitate the Government to collect the recycling levy, as well as the limit of the levy that the Government is authorised to collect, as well as on the recovery targets that suppliers are expected to meet, along with the methods used to determine and measure these targets.
3. Additional details are needed on the types of suppliers and the circumstances under which they may be exempted from the scheme or from submitting a producer responsibility plan.
4. Considering the substantial amount of work involved, it may be worth considering the postponement of the implementation to a later date, such as to the year 2026. The Association is concerned about the sufficiency of time for the retailers/suppliers and the scheme operators to prepare for the implementation.

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