



Friends of the Earth (HK) Submission on the Public Consultation on Producer Responsibility Scheme on Plastic Beverage Containers

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Preface

Hong Kong has a plastic crisis. Beverage consumption in the city have continued to trend upwards over the years, and with it, so did the waste generated from beverage packaging. Polyethylene terephthalate (PET) bottles make up for more than 60% of beverage packaging used, followed by both liquid cartons and metal cans.¹

Despite being a highly recyclable resin and government promotion for clean recycling, less than half a percent of PET beverage containers get recovered for processing.² Instead, according to the latest statistics from the Environmental Protection Department, over 120 tonnes of PET beverage containers is disposed at landfills every day—and that is not accounting for the bottles that are littering our beaches, country parks, and environment.

As such, Friends of the Earth (HK) welcomes the proposal for a mandatory producer responsibility scheme on plastic beverage containers (PPRS) to tackle the growing plastic waste issue in Hong Kong.

1. Do you support introducing a mandatory PRS to enhance the recycling of plastic beverage containers?

Strongly support

The current recovery rate of plastic beverage containers in Hong Kong is abysmal due to a combination of low confidence in the system, high collection and sorting cost, and lack of economic incentives to separate and recycle.

Friends of the Earth (HK) believes that a mandatory PRS (producer responsibility scheme) can enhance the local recycling of plastic beverage containers. The effectiveness of a PRS can be easily compared in the U.S., where states with a container-deposit scheme generally have higher beverage container collection rates.³

However, we are of the opinion that all single-use beverage packaging formats should be covered by the mandatory PRS to encourage the collection of all packaging waste and discourage beverage suppliers from shifting to exempted formats.

¹ [Drink Without Waste, Research Report](#)

² [EPD, Monitoring of Solid Waste in Hong Kong – Waste Statistics in 2019](#)

³ [Container Recycling Institute, Bottled Up \(2000-2010\) - Beverage Container Recycling Stagnates](#)



2. Do you agree that the PPRS should cover beverage products within the volume range of 100mL-2L?

Support

We agree the PPRS should cover 100mL to 2L beverage products, but we are not convinced of the reasoning to confine the scope within that range.

There are few reasons to limit the size range to what reverse vending machines can accept when manned collection points exist (including the government's own Recycling Stations).

Whether or not it is practical for beverage suppliers to change size formats, putting a size restriction only opens the opportunity for potential abuse with few possible benefits to the PPRS that we can see.

3. Do you support the provision of rebate under the proposed PPRS?

Strongly support

We agree that the provision of a rebate can incentivise the public to properly sort and practice clean recycling of plastic beverage containers. A recent study showed that a bottle deposit scheme could help to boost the recovery rate with support of over 60% of the interviewees towards the scheme.⁴

4. Do you consider a rebate at 10 cents per container an appropriate level? If not, what should be the minimum rebate level?

Disagree

We believe that a 10-cent rebate is insufficient to achieve a recovery rate that we consider acceptable. A public survey by *Drink Without Waste* found that at least 33% of respondents would support a five-cent rebate with marginal increase at 10 cents.⁵ However, a review of existing container-deposit schemes around the world shows that the proposed 10-cent rebate (1% of retail price⁶) would only translate to a less than 60% recovery rate (Fig 1).

Extrapolating further, if the government desires to achieve at least 90% recovery rate, it should consider setting the rebate value at around one dollar (15% of retail price) (Fig 1).

⁴ [The University of Hong Kong, HKU-led research promotes territory-wide extension of plastic bottle deposit scheme with support of over 60 % of the interviewees, suggesting the introduction of HK\\$1 plastic bottle deposit](#)

⁵ [Drink Without Waste, Survey - Plastic Bottle Recycling Public Attitudes and Behaviours](#)

⁶ [Consumer Council, Coca Cola - Coke - Bottle 500ml](#)

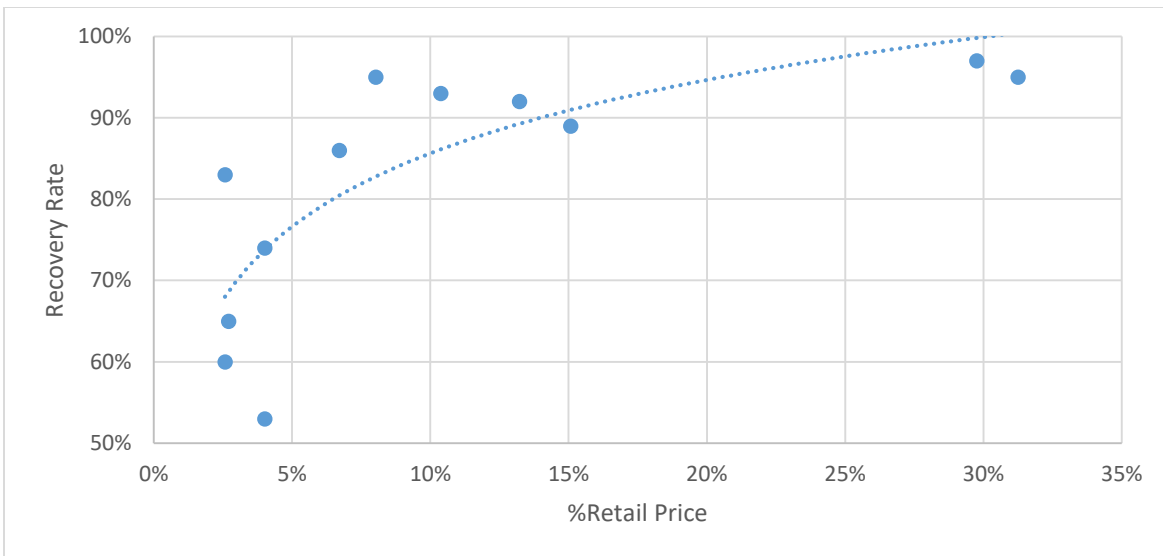


Fig 1. Comparison of ratio of container-deposit fee on retail price and recovery rate of covered plastic beverage containers⁷

It is more imperative that the government includes a review mechanism to adjust the rebate value as necessary to meet the recovery target—which is critically missing in the consultation document—it intends for the PPRS to achieve.

It should also be kept in mind that a high rebate value by itself does not improve recovery rates, it needs to be backed by an effective collection network and strong collective consciousness.

5. Do you support that relevant retailers (in particular the larger retail stores) should be mandated to provide take-back and rebate redemption services?

Support

We are supportive of retailers providing take-back and rebate redemption services in their stores to increase accessibility and convenience for the public. Given the success overseas, we know it is feasible for retailers to provide take-back services or install reverse vending machines.^{8 9 10} At the same time, we advise caution as it may create an unintentional effect by pushing retailers towards opening smaller stores. The possible pushback from retailers may also hamper the legislation’s success.

⁷ Data on deposit and recovery rate retrieved from [Bottle Bill Resource Guide](#) and respective government websites. Price data is retrieved from [GlobalProductPrices.com](#) or from respective local retailers using a 500mL bottle of Coca Cola (or 20 fl oz. for the U.S.) as a reference point.

⁸ [Beer Store, The Beer Store and the Ontario Deposit Return Program](#)

⁹ [Sainsbury’s, Recycling facilities available at our stores](#)

¹⁰ [The Guardian, Plastic bottle deposit scheme in UK proving hit with shoppers](#)



6. What are your preferred types of locations listed below for the take-back and rebate redemption services? Please accord priority. (1 has the highest priority; 6 has the lowest priority. Please do not repeat.)

- Public transport facilities
- Public facilities
- Shopping centres
- Supermarkets
- Other relevant retail stores
- Residential estates

All of the proposed locations are essential for the take-back and rebate redemption service. Preference should prioritise by the convenience and comfort for the public to return beverage containers without inconveniencing others. In addition to the above options, the government should engage existing recycling shops and upgrade its waste management infrastructure to handle collection.

7. Do you support that we should collect the recycling levy at supplier level (i.e. manufacturers and importers) to fund the operation of the PPRS?

Strongly support

We believe this would properly reflect the producer pays principle; manufacturers and importers have at least a moral and financial responsibility to support the recycling of packaging waste generated and mitigate the consequences of climate change and environmental pollution. Such an arrangement at minimum is true for most if not all similar schemes around the world.¹¹

8. Do you agree that moderate reduction of recycling levy should be allowed if suppliers have provided proper arrangements to recycle plastic beverage containers meeting certain environmental requirements?

Neutral

We can see the benefits of providing fee modulation for beverage suppliers who voluntarily adopt more sustainable practices for their own products at end-of-life. At the same time, we caution that this arrangement would require greater government oversight to prevent bad faith actors from abusing potential loopholes.

¹¹ [European Commission – DG Environment, Development of Guidance on Extended Producer Responsibility \(EPR\)](#)

It has been noted from European experiences that fee modulation could encourage individual suppliers to pursue more ecofriendly designs and solutions rather than improving collection and recycling.¹² Further, there is the risk the system could unintentionally introduce exotic waste streams (i.e. bioplastics that cannot be recycled with synthetic counterparts).¹³

9. Do you support imposing licensing requirement on recycling facilities for handling the waste plastics collected under the proposed PPRS?

Strongly support

Past anecdotes and documentations of collected recyclables being sent to landfills have negatively affected recovery rates as some people now hold the belief that recycling is a pointless effort.¹⁴ This mindset is reflected by at least 20% of respondents in a recent survey regarding public attitude and behaviour toward recycling plastic beverage bottles.¹⁵

Imposing licensing requirements for recycling facilities is one of the first steps towards rebuilding public confidence in the city's waste management system. It is also important to increase oversight of government waste management contractors.

10. (a) Do you have any specific suggestion(s) on promoting eco-packaging design?

As mentioned in our response to Q8, the inclusion of a fee modulation mechanism may encourage beverage suppliers to develop more ecofriendly designs or solutions to delivering their products.

The government could further consider adopting and promoting the design guideline prepared by *Drink Without Waste*.¹⁶

10. (b) Do you have any other comments on the PPRS and other plastic-related issues?

With regards to the PPRS itself,

(1) As mentioned earlier, it is imperative that the government must set a recovery target for the PPRS. The lack of one in the consultation makes it difficult for us to comment or evaluate PPRS's potential effectiveness.

(2) The PPRS must include a transparent and accountable review mechanism to adjust the rebate value and implement improvement measures as necessary. Data on recovery rate and such must be available for public access to ensure trust in the system.

¹² [Institute for European Environmental Policy, EPR in the EU Plastics Strategy and the Circular Economy: A focus on plastic packaging](#)

¹³ [Wojnowska-Baryła et al., Effect of Bio-Based Products on Waste Management](#)

¹⁴ [HK01, 追蹤器揭白做回收 9 大屋苑疑將回收膠樽 直送堆填區 \(Chinese only\)](#)

¹⁵ [Drink Without Waste, Consumer Survey: Plastic Bottle Recycling—Public Attitudes and Behaviours](#)

¹⁶ [Drink Without Waste, Guidance on Design of Single-Use Beverage Containers for Recycling in Hong Kong](#)

The PPRS is however only one small part of the holistic strategy to tackle the city's beverage packaging and plastic waste issues.

- (3) Producer responsibility must be extended to other beverage packaging formats as well—whether it is in the same form as the PPRS, mandatory take back, or bans where recycling is not feasible.

Even if these other formats currently account for a small percentage of beverage products in Hong Kong, they still burden our waste management systems. Further, having exemptions could unintentionally push suppliers to migrate to packaging formats not covered under PRSs.

- (4) Reduction is the most effective solution under the waste hierarchy. The government must take lead by moving away from bottled water and switching towards providing water refill stations where feasible, such as on government premises, public parks, and country parks. It should regularly test and maintain water refill stations to build confidence on their safety and reliability.

The government should also encourage beverage suppliers to explore less-wasteful means of delivering their products, such as through reusable containers, syrup concentrate, dispensing stations, etc. At the same time, it could fund the research and development of more sustainable eco-packaging materials and designs and more advanced recycling technologies.

- (5) On plastic-related issues, the government should move to ban single-use plastic items. Many countries have proposed or implemented bans on plastic bags, cutlery, straws, microbeads, and more.^{17 18} China have also moved to ban non-degradable plastic bags and single-use plastic utensils and will impose a ban on non-degradable postal and courier packages by 2022 on its major cities.¹⁹
- (6) The government should lead by example and adopt stronger green procurement guidelines, such as purchasing products made with higher percentage of recycled materials or eco-designed products. The government should also standardise green labelling and environmental claims to better inform consumers of their product choices.
- (7) Finally, the government must legislate the municipal solid waste charging bill to drive waste reduction behaviours and encourage the community to practice clean recycling.

¹⁷ [World Economic Forum, Which countries have bans on single-use plastics?](#)

¹⁸ [Bioplastics News, Plastic Microbeads Bans in 2018](#)

¹⁹ [Library of Congress, China: Single-Use Plastic Straw and Bag Ban Takes Effect](#)