



**Friends of the Earth (HK) Response on the Market-Based
Producer Responsibility Scheme on Plastic Beverage
Containers (PPRS)**

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Friends of the Earth (HK) welcomes the alternative option for producer responsibility scheme on plastic beverage containers (PPRS) operating on a market-based model in principle. A market-based PPRS would demonstrate the beverage industry has the commitment to assume producer responsibility and develop a circular economy. Regardless, mandatory producer responsibility is necessary to improve the recovery rate of plastic beverage containers and to tackle the growing plastic waste issue in Hong Kong.

We have the following comments with regards to the details within proposal:

Overall Framework

1. The government has a duty to regularly review the different components of the PPRS, including the responsibility of the key stakeholders, the minimum rebate value, the recycling target, and more. The review process preferably should include a dedicated, independent body to advise on policy decisions.
2. Beyond driving public buy-in through community outreach, the government should also provide support for access to public areas, housing estates, and municipal facilities—including those of statutory bodies—for setting up return points. Relevant market support, such as long-term leases, should be made available for Hong Kong recyclers.

Operation Details

3. Hong Kong already lags behind other global cities in managing plastic waste. We recommend putting the PPRS into implementation as soon as possible with a low target and then ratchet up progressively. The process and timing to review the target should be included within the legislation.
4. High transparency and a strong chain of custody is important to build cooperation and confidence in the PPRS. We support having registered scheme operators and licensed recyclers to ensure compliance with environmental laws and achieve the intended recycling outcome. Imposing licensing requirements is one of the first steps towards rebuilding public confidence in the city's waste management system.
5. We agree with the government setting a minimum rebate value, while scheme operators should work with beverage suppliers to provide additional incentive

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as necessary to achieve the recycling target. The agreed rebate should be transparent.

6. Compliance at the distribution and retail level must be monitored and enforced. Retailers should be held liable for the sales of unregistered beverage products.
7. We are supportive of retailers providing take-back and rebate redemption services in their stores to increase accessibility and convenience for the public. We note that the document has not made clear as to whether retail stores operating at a certain scale, with a certain sales volume, or of both should be mandated to provide take-back services.
8. Property owners should be compelled to provide space to place facilities for recovering used beverages. Bulk collection points can be set up in spaces such as housing estates and recycling shops to facilitate the handling of all container formats.

The PPRS is however only one small part of the holistic strategy to tackle the city's beverage packaging and plastic waste issues. All single-use beverage packaging formats should be covered to encourage the collection of packaging waste. Gaps in the PPRS may inadvertently aid in a shift towards unregulated and potentially less-recyclable packaging formats.

Reduction is also the most effective solution under the waste hierarchy. The government should 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 should fund the research and development of more sustainable eco-packaging materials and designs and more advanced recycling technologies.