



Friends of the Earth (HK) Submission on the Public Engagement on Control of Single-use Plastics

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Preface

Hong Kong has a plastic crisis. With more and more things being packaged in disposable plastics, the volume of plastic waste is on rising trend. In 2020, more than 2,300 tonnes of plastics was disposed of at landfills in Hong Kong every day, accounting for 21% of the city's municipal solid waste. This public engagement on control of single-use plastics is a welcomed move, but is still lacking in many ways. Data on the targeted single-use plastic products are missing, making it difficult to evaluate which items should be prioritized first. The targeted items are but a small fraction of single-use plastics available on the market. It is imperative to expand the scope further.

Questions

1. How concerned are you about each of the following issues with single-use plastics?

a) Issue: Single-use plastics are littered in the natural environment, which causes pollution and harm to wildlife.

5 – Very Concern, Friends of the Earth (HK) is very concerned of the environmental impacts caused by single-use plastics, such as water pollution and its harm to the wildlife. The durability and resistance of plastics to degradation make most plastic items never fully disappear, and many of the tiny plastic particles are mistakenly swallowed by farm animals or fishes.¹

We worry that if the amount of plastic waste in the natural environment continues to increase, it will adversely affect the biodiversity and food chain. Not limited to ocean species, land-based animals also consumed plastics in accident, and in some cases causing death.² Therefore, there is a need to ban the use of single-use plastics to avoid further injuries or deaths.

b) Issue: Use of single-use plastics increases carbon footprint and poses climate change hazard.

5 – Very Concern, we are aware of the climate change impacts created by single-use plastics. Nearly all plastic products are made up of fossil fuels, and refining these fossil fuels into plastics further drive up carbon emissions as it is an energy-intensive process.³

With reference to a report published by the Center for International Environmental Law, the production and incineration of plastic produced more than 850 million metric tons of greenhouse gases in 2019. Greenhouse gas emissions from the plastic lifecycle threaten the ability to control the

¹ [UN Environment Programme – Our planet is drowning in plastic pollution – it's time for change!](#)

² [UN Environment Programme – Impacts of Plastic Pollution on Freshwater Aquatic, Terrestrial and Avian Migratory Species in the Asia and Pacific Region](#)

³ [Sustainability Times – Single-use plastics leave a large carbon footprint](#)

global temperature rise below 1.5 degrees Celsius.⁴ It is critical to impose a ban on the use of single-use plastics to avoid the worsening of climate change.

c) Issue: Single-use plastics are difficult to recycle and take up valuable landfill space.

5 – Very Concern, single-use plastics easily take up valuable landfill space. With reference to the Hong Kong 2020 Waste Statistics, 2,312 tonnes of plastic waste was disposed of at landfills per day in 2020, constituting for 21% of the municipal solid waste and ranking third after food and paper waste.⁵

More importantly, the landfills in Hong Kong are reaching their limits. In the past years, the waste disposal amount at the three strategic landfills in Hong Kong was much higher than expected.⁶ Single-use plastics served as a major constituent of landfills in Hong Kong, and there is a need for citizens to stop the use of single-use plastics as a practice to reduce the pressure on landfills.

d) Issue: The society's over-reliance on single-use plastics promotes a wasteful culture.

5 – Very Concern, we realize that the society is very reliant on the use of single-use plastics, such as for food and drinks, public health and shopping purposes. The wasteful culture is increasingly prominent under the COVID-19 pandemic, where the disposal of single-use plastics has become more common due to greater public health awareness.

Increasing consumption of face masks and hand sanitizers has increased the amount of household waste.⁷ Disposable face masks are made of composite materials of different kinds which are not suitable for recycling.⁸ Although there are alternatives such as reusable masks, single-use masks remain comparatively popular among citizens. The use of single-use plastics not only put a greater pressure to the landfill capacity, but also promotes a wasteful culture in the society.

2. What types of product should be put under control? For those that should be controlled, should actions be taken in short-term (within 3 years) or medium-term (3 – 5 years)? What should be the approach for controlling them?

a) Local product packaging

Short-term, regulatory measure; we believe that local product packaging should be controlled with regulatory measures in the near term. For example, egg cartons made from recycled paper existed well before their plastic counterparts, so alternatives are readily available on the market.

⁴ [Center for International Environmental Law – Executive Summary: Plastic & Climate The Hidden Costs of a Plastic Planet](#)

⁵ [HKSAR Environmental Protection Department – Monitoring of Solid Waste in Hong Kong: Waste Statistics for 2020](#)

⁶ [Ove Arup & Partners Hong Kong Limited – A comprehensive study to expand the capacity of landfill sites](#)

⁷ [Hong Kong Free Press – Coronavirus: How Hong Kong's dramatic drop in recycling sets a dangerous new norm](#)

⁸ [HKSAR Press Releases – LCQ5: Impacts of discarded face masks on the environment and ecology](#)

b) Local retail packaging

Short-term, regulatory measure; local retail packaging, such as foam tray for fresh fruit and meat, should be controlled with regulatory measures in the near term. Black plastic trays make food look good, but are difficult for sorting machines to identify.⁹ Companies such as MULTIVAC introduced single-origin recyclable packs made of paperboard or cardboard, which replaced the typical plastic foam tray for packaging.¹⁰

c) Local packaging for logistics and online shopping

Short-term, regulatory measure; local packaging for logistics and online shopping should be regulated immediately. A study found that an average of 2.32 pieces of packaging is used for each product for online shopping.¹¹ As online shopping becomes increasingly common in the contemporary society, there is a pressing need to control the quantity of single-use plastics used for local packaging.

d) Festival and celebration products

Short-term, total ban; festival and celebration products, such as glow sticks or inflatable cheer sticks, should be banned as early as possible. Unlike local product packaging or local packaging for online shopping which might be essential for carrying fragile products, most if not all festival and celebration products are non-essential. A survey found that over 40% respondents used glow sticks when celebrating for the mid-Autumn Festival in 2019, with the average family disposing 42 glow sticks.¹² Hardly recyclable and non-essential, there is an urging need for the government to impose a total ban on this category of single-use plastic products.

e) Toiletries distributed by hotels

Short-term, total ban; toiletries distributed by hotels, such as showering product in small bottles, should be banned as early as possible. In recent years, hotel groups such as the InterContinental Hotels Group and Marriott International implemented measures to ban the provision of showering product in small bottles and reduce the quantity of plastic bottles disposal.¹³ Toiletries distributed by hotels should be totally banned as it is non-essential, and it is not difficult for residents to bring their own toiletries.

⁹ [World Economic Forum – Why is black plastic packaging so hard to recycle?](#)

¹⁰ [Packaging Strategies – MULTIVAC’s Plastic-Free Packaging for Fresh Fruit and Vegetables](#)

¹¹ [South China Morning Post – 780 million pieces of plastic packaging used for Hong Kong online shopping orders in 2020; green group urges regulation of issue](#)

¹² [香港 01 – 中秋節咪玩荧光棒! 丟棄後污染環境難回收 破裂濺出液體可致盲](#)

¹³ [晴報 – 停派小瓶沐浴用品 酒店〔走塑〕年減數億膠樽](#)

f) Umbrella Bag

Short-term, total ban; disposable umbrella bags should be banned immediately. A study found that 14 million disposable plastic umbrella covers were used in the wet season of 2017.¹⁴ Rainwater drippings can be minimized with umbrella dryers and floor mats. There is no need for malls or buildings to distribute umbrella bags.

g) Supplementary tool sold together with a product for its usage or consumption

Short-term, total ban; we believe that supplementary tool, such as plastic straw attached to drinks, should be banned. There are already replacements for plastic straws, such as paper straws or biodegradable straws. A growing number of restaurants are eliminating single-use plastic straws and replacing it with a straw-less lid or paper straws¹⁵. Restaurants or shops that offer drinks to customers shall consider sustainable alternatives as a means to reduce single-use plastic product consumption.

h) Other toiletries like plastic stemmed cotton buds

Short-term, total ban; other toiletries should be controlled with immediate bans. Some parts of the world have already banned the sale and manufacture of plastic-stemmed cotton buds, such as Scotland, with most of the retailers switching to paper-stemmed buds as a relatively sustainable alternative.¹⁶ Hong Kong should follow the footsteps of other countries or regions to eliminate frivolous use of single-use plastics.

i) Miscellaneous items such as signage for meetings, conventions and exhibitions

Short-term, total ban and regulatory measure; signage for meetings, conventions and exhibitions should be regulated in the near term and depending on the scale of event, adopting a regulatory approach or imposing a total ban. These miscellaneous items can be replaced by more sustainable alternatives, such as electronic signage or arranging additional staffs to direct visitors to the meeting, convention or exhibition venue.

3. Enhancing existing measure - the Plastic Shopping Bag Charging Scheme

3.1) Do you agree that the current exemption for Plastic Shopping Bag (PSB) carrying frozen/ chilled foodstuff in airtight packaging can be removed?

Yes, we agree that the current exemption can be removed, as reusable bag also serve the function of carrying this type of foodstuff. Besides, it is also a more sustainable alternative to encourage

¹⁴ [South China Morning Post – Fourteen million one-off umbrella bags add to Hong Kong’s waste crisis](#)

¹⁵ [Starbucks Coffee Company – Starbucks to Eliminate Plastic Straws Globally by 2020](#)

¹⁶ [BBC – Plastic-stemmed cotton buds now banned in Scotland](#)

customers to bring their own bags than to distributing single-use plastic shopping bags (PSB).

3.2) Do you agree that foodstuff already fully wrapped by non-airtight packaging should not be provided with free PSB?

Yes, we agree that this type of foodstuff should not be provided with free PSB. It is unnecessary to provide an extra PSB to customers, since the non-airtight packaging already allows customers to carry by bare hand. Alternatively, customers can bring their own reusable bags.

3.3) Do you agree only ONE PSB should be exempted for carrying foodstuff not fully wrapped by any packaging (e.g. bread sold at bakeries, fruits sold at wet market)?

No, I consider no exempted PSBs should be provided; we do not agree that PSBs should be exempted for carrying foodstuff of this type. There are already more sustainable alternatives to carry this type of foodstuff. For instance, the plastic bags for bakeries can be replaced with paper bags to reduce the threat towards wildlife. For fruits sold at wet market, customers can bring their own reusable bags.

3.4) What is the minimum charging level that can discourage you from using a PSB (HKD)?

\$2, we suggest to set the minimum charging level of a PSB to \$2. Since the plastic bag levy first implemented in 2009, the charging fee has remained at 50 cents.¹⁷ It is essential to set the minimum charging level higher, at least to \$2, to increase the effectiveness of the Plastic Shopping Bag Charging Scheme and to better achieve the objective of plastic waste reduction. Moreover, the government should include a review mechanism to adjust the charging level as necessary to meet the reduction target.

4. Do you agree that, if more information on the recyclability and percentage of recycled content of a single-use plastic product is provided by the manufacturer, it would be helpful for consumers to make an informed purchase decision?

Yes, we agree that if manufacturers provide useful information on recyclability of their products, it will be helpful for consumers to make an informed purchase decision. The provision of this relevant information should also be extended to imported goods and products.

Similar to nutrition labels where consumers look for dietary choices which fit their needs, people are now looking for sustainable and environmental-friendly product choices. With higher environmental awareness, more consumers will look for products which are recyclable or with high percentage of recycled content before they make purchasing choices if these information is provided by the

¹⁷ [Environmental Protection Department – Full Implementation of the Plastic Shopping Bag Charging](#)

manufacturer.

5. Do you agree there is a need to develop a platform for sharing information on plastic alternatives among different stakeholders (including businesses, material suppliers and consumers)?

Yes, we agree that there is a need to develop a platform to share information on plastic alternatives. The online platform should be easily accessible to the public and convenient for different stakeholders to understand about plastic reduction and replacement alternatives. The platform should facilitate communications between different stakeholders and drive forward joint actions to reduce single-use plastics.

6. When there are different brands available for the same type of merchandise. Which of the following green considerations would affect your choice?

a) Whether the product can be re-used

Strongly affected; whether the brand offers reusable products strongly affects our purchasing choices. Reusable products help to reduce carbon footprint, lengthen product life cycle, at the same time reducing the amount of single-use plastics deposited to landfills.

b) Whether “green material” is used

Strongly affected; products and packaging made with sustainable materials help to reduce the disposal of single-use plastics and their impact on the environment. The Consumer Council could play an overseeing role to test whether products with “green material” claims are truly environmentally-friendly.

c) The brand’s “corporate environmental responsibility”

Strongly affected; brands and companies generally have more resources and influence than individuals to drive sustainable practices, such as embracing sustainable options and running recycling programmes and “take-back” services. Supermarkets and retail stores could also offer refill options with minimal packaging and provide discount to customers who bring their refillable bottles.

d) Whether the product is not over-packaged

Strongly affected; whether the product is over-packaged or not strongly affects our purchasing choices. Take food souvenirs as an example, which may have multiple layers of packaging and some are made by single-use plastics. Over-packaging created a large amount of plastic waste, and it would be critical to reduce the quantity and layers of packaging to protect the environment.

7. One of the reasons that plastics are so commonly used is their comparatively cheap price. Replacing plastics by non-plastic / reusable alternatives may drive up the costs of the products. To reduce the use of single-use plastics, are you willing to pay more? If yes, assuming that a single-use plastic item costs \$10, how much are you willing to pay for the same product made from non-plastic / reusable alternatives?

More than \$1.5 (i.e. more than 15% of product price); we are willing to pay more than 15% for the same product made from non-plastic alternatives. We believe that to develop a plastic-free lifestyle, there is a need to support more environmentally-friendly options. The government can ease the burden on green consumers via subsidies for sustainable products.