



Friends of the Earth (HK) Submission on the Public Consultation on the Scheme on Regulation of Disposable Plastic Tableware

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1. Do you support in principle the introduction of legislation to regulate disposable plastic tableware?

Strongly support, plastic disposal figures in Hong Kong are staggering. In 2019, we are producing 2,320 tonnes of plastic waste everyday while only 8% is recovered.¹ Most of them are disposed in landfills, but some litter the streets and even enters the ocean. A local research indicated that the mean microplastic abundance for Hong Kong was 5595 items/m². Significantly, expanded polystyrene (EPS) which is often used for takeaway food containers accounted for 92% of marine plastic debris.²

Plastic debris and additives contaminate the ocean with harmful chemicals. It is reported that 190 tonnes of 20 chemical additives (including polychlorinated biphenyls (PCBs) and metals) have leaked into the ocean. Common plastic items such as polypropylene (PP) cutlery and EPS containers accounts for a significant source of these pollutants. Notably, the concentration of PCBs within microplastic in Hong Kong is estimated as 10-757 ng/g, which is 85,000 times more than in the North Pacific gyre.³

Friends of the Earth (HK) believes that the introduction of legislation to regulate disposable plastic would significantly decrease the leakage of plastic waste into our environment and hence, protect our health.

2. (a) Do you agree that the Regulation Scheme should cover various types of disposable plastic tableware?

Agree on all, the current pattern of consumption is unsustainable. Although disposable cutlery is made of recyclable plastic, people's consumption habit is a big barrier to recycling. It is found that, in China, 91.7% of takeaway packaging material is immediately thrown into trash after the meal.⁴ Further, disposable tableware has relatively low recycle value. They may be contaminated with food residue and are too light to be sorted correctly by recycling machines.⁵ Due to consumer habits and the difficulty of recycling, the scheme should cover a wide range of single-use tableware to prevent further plastic pollution.

Bans on the production and sales of single-use plastic tableware has been implemented in many regions. For instance, Victoria, Australia will ban the supply and sale of various types of single use plastic, including straws, cutlery, plates and EPS container by 2023, and the government will do an early phase-out of those items from public services by February 2022.⁶ The European Union member states have moved to tackle the ten most common disposable items in July 2021,⁷ which cover all types of plastic in Hong Kong's regulation scheme. To be in line with the international trend, Friends of the Earth (HK) believe that various types of plastic tableware should be banned.

¹ [EPD, Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2019](#)

² [Fok and Cheung, Hong Kong at the Pearl River Estuary: A hotspot of microplastic pollution](#)

³ [De Frond *et al.*, Estimating the Mass of Chemicals Associated with Ocean Plastic Pollution to Inform Mitigation Efforts](#)

⁴ [Zhong *et al.*, Construction of Take-out Tableware Recycling System Based on Circular Economy Theory](#)

⁵ [Sustainability Victoria, Eco-friendly alternatives to disposable dinnerware](#)

⁶ [State Government of Victoria, Single-use plastic ban](#)

⁷ [European Commission, Single-use plastics](#)

2. (b) Do you agree that the Regulation Scheme should cover “plastic substitutes” (e.g. oxo-biodegradable plastics, biodegradable plastics, etc.) that claim to be degradable or biodegradable?

Strongly agree, many “plastic substitutes” available on the market are not really degradable or biodegradable. In many cases, they will mainly become smaller fragments of microplastic.⁸ Even though they claim to be “totally decomposable and compostable”, it requires specific conditions such as enzyme, humidity and/or temperature that are usually only afforded by industrial facilities. For example, polylactic acid (PLA) needs environmental conditions of 55±5°C to decompose visibly in three weeks. In the marine environment, the same process would take 600 days and result in a mass loss of 10-12% only.⁹

Moreover, there is a lack of industrial composting equipment in Hong Kong, which means these plastic substitutes will just be treated as landfill waste. Even with the relevant equipment, there is a risk of cross-contamination with recyclable plastics from missorting at the consumer level.

3. Do you agree that the sale of disposable EPS tableware to local end-consumers (including catering premises) should be banned?

Strongly agree, a ban on sale of disposable EPS tableware is necessary to close potential loopholes. Without a ban, manufacturers could establish a dense network of sales points allowing consumers to purchase disposable tableware nearby. Plastic pollution cannot be tackled unless the supply chain is addressed. It is important to reduce waste at source (i.e. suppliers), so that the policy can stimulate the innovation of eco-friendlier alternatives.

Single-use utensils are an unnecessary waste that consumers and the catering industry can avoid. People should be encouraged to bring their own utensils for takeaway. There are also businesses that provide tableware washing services in Hong Kong,¹⁰ which is fit for restaurants that cannot accommodate dishwashing facilities.

⁸ [UNEP, Biodegradable Plastics & Marine Litter](#)

⁹ [Ho et al., Degradation of Polylactic Acid \(PLA\) Plastic in Costa Rican Soil and Iowa State University Compost Rows](#)

¹⁰ [EZ Wash, 洗碗公司](#)

4. Do you agree that the Regulation Scheme should cover all catering premises?

Strongly Agree, plastic tableware is the second-largest source of plastic waste in Hong Kong.¹¹ Catering service, no matter for dine-in or takeaway, is the biggest contributor. During Covid-19, the consumption of disposable plastic utensils has increased by 50%.¹² It is clear that relevant policies are required to prevent further plastic pollution.

Cities overseas have enforced policies to reduce plastic consumption from all types of catering services. For example, the government of Seattle has banned single use plastic utensils and straws in 2018.¹³ All food service businesses including coffee shops, restaurants, food trucks and canteens are not allowed to provide single use plastic cutlery.

5. Do you agree that provision of disposable plastic tableware by catering premises to customers for dine-in services should be completely banned in the first place?

Strongly agree, disposable plastic utensils produced from dine-in catering account for a significant portion of plastic waste, comparable to takeaways. Disposable plastic utensils are commonly used in fast food catering due to convenience. A local research indicated that the main three fast food restaurants in Hong Kong alone used 180 million pieces of disposable cutlery in 2017.¹⁴ In another survey, food courts were found to consume over 350,000 pieces of disposable utensils during lunch hours every month.¹⁵

Disposable plastic tableware is totally avoidable for dine-in catering services. Dine-in restaurants should either have their own reusable tableware or find dishwashing services if the store is not large enough to wash dishes.¹⁶

6. Given that catering services provided for private events and dine-in services are similar in nature, do you agree that catering services provided for private events (including the provision of food & beverages and catering staff) should be included in the scope of dine-in services?

Strongly agree, there are two reasons to include catering services provided for private events in the scope of dine-in services.

¹¹ [EPD, Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2019](#)

¹² [RTHK, 團體推算本港今年棄約 150 億件膠餐具 籲自備餐盒](#)

¹³ [City of Seattle, Straws & Utensils](#)

¹⁴ [SCMP, HK students say people should bring reusable cutlery, after local fast-food giants reported to have used 180 million pieces of disposable plastic in 2017](#)

¹⁵ [Green Sense, Green Sense survey of dine-in disposable utensils in HK food courts](#)

¹⁶ [EZ Wash, 洗碗公司](#)

First, caterers providing for private events would be motivated to innovate their business model to reduce the usage of disposable plastic tableware. Second, event tableware rental services that include transportation, professional storage and dishwashing already exist in Hong Kong.¹⁷ We believe the inclusion of catering services for private events into the legislation to be very reasonable.

7. Do you agree that a ban on the provision of disposable plastic tableware by catering premises to customers for takeaway services should be imposed in phases?

We agree that the provision of all Phase One items for takeaway services should be banned. Firstly, while disposable plastic tableware is technically recyclable, their small size and inconsistent material makes recycling difficult.¹⁸ Secondly, disposable plastic tableware make up for many of the some 17.5 million pieces of plastic that enter into the sea from Sha Tin Shing Mun River each year.¹⁹ Given that there are sufficient alternatives for Phase One items, they should be banned earlier to relieve the current plastic crisis.

On the other hand, we stand neutral on the Phase Two items. There is a need to hasten the pace at which we phase out the disposable plastic tableware for more sustainable alternatives. Certain business models can quickly adopt sustainable alternatives, such as food courts and canteens in shopping malls and universities using reusable containers.^{20 21}

8. What are your views on the timetable for implementing the Regulation Scheme in a progressive manner as proposed in the Regulation Scheme?

Disagree, we believe the Regulation Scheme should be implemented as soon as possible. The 2025 implementation date for Phase One and the 12-18-month gap between Phase One and Phase Two are far too relaxed to tackle the plastic problem. Notably, there are many places that have already launched policies to control single-use plastics.

Nationwide, the Break Free from Plastic Pollution Act of 2020 sets forth to phase out single-use products across the U.S. from January 1 next year.²² Further, China started to progressively ban the use of non-degradable single-use tableware by the end of 2020.²³ The Europe Union's directive on single-use plastics

¹⁷ [We Use, We Use Tableware Rental Service](#)

¹⁸ [The City of Calgary, How to dispose of plastic cutlery](#)

¹⁹ [Hong Kong Free Press, 17.5m pieces of plastic flow to the sea from Hong Kong's Shing Mun River every year: Greenpeace](#)

²⁰ [Institute for Sustainable Futures, Feasibility Study: Reusable food containers for takeaway food in the Sydney CBD](#)

²¹ [Harvard University, Reusable Container Program](#)

²² [Library of Congress, H.R.5845 - Break Free From Plastic Pollution Act of 2020](#)

²³ [Xinhua, China Focus: Reality check after China upgrades plastic ban](#)



have banned the sales of ten items starting from July 3, 2021, including tableware, food containers, cotton bud sticks, and more.²⁴

Locally, we can see many chained restaurants have gradually reduced the usage of disposable plastic tableware. For example, the Environmental Campaign Committee has cooperated with three fast food chains to launch “Plastic-Free Takeaway, Use Reusable Tableware” campaign in 2019, which reduced the usage of 1,200,000 plastic disposable tableware.²⁵ The public is already highly accepting of dining without disposable plastic tableware and is able to search for their own alternative, and restaurants are able to provide alternatives in Hong Kong.

9. Do you agree to the proposed exclusions?

We stand neutral on the provision of disposable plastic straws under special circumstances. We recognise that some people with disability or with spinal muscular atrophy may need to use straws for beverages. We understand not all alternative options are completely suitable replacements—such as the inability for paper straws to bend, a subset of people with allergies to materials like silicone, or metal straws potentially causing injuries to users.²⁶

We encourage people to bring their own straws if possible to avoid any potential mishap. At the same time, we call on manufacturers to develop better environmentally-friendly straws that address the abovementioned issues and more.

We disagree on the exclusion of disposable plastic tableware arising from prepackaged food. The packaging of prepackaged food contributes to plastic pollution and should be included in the scope of the regulation—especially if it is packaged locally. We believe that a ban on the usage of disposable plastics in prepackaged food would encourage food manufacturers to seek/develop more environmentally-friendly packaging to sell their products on the market.

10. Do you have any other opinions on the “Scheme on Regulation of Disposable Plastic Tableware” and other relevant issues?

- We urge the government to provide support on the development of sustainable alternatives and to develop infrastructure capable to process these tableware and relevant packaging materials

²⁴ [European Commission, Single-use Plastics](#)

²⁵ [GovHK, Second phase of "Plastic-Free Takeaway, Use Reusable Tableware" saves over 1 million sets of disposable tableware](#)

²⁶ [World Economic Forum, Time to say goodbye to the plastic straw. But what's the best alternative?](#)



- The regulation of disposable plastic tableware is only one small part of the holistic strategy to tackle the city's packaging waste issues. Producer responsibility must be extended to other sources of packaging waste as well—whether it is in the form of a rebate system, mandatory take back, or ban where recycling is not feasible
- The government should standardise/update green labelling and environmental claims to better inform consumers of their product choices and how to dispose of them properly

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