

May 17, 2021



The American Chamber
of Commerce in Hong Kong
1904 Bank of America Tower
12 Harcourt Road, Hong Kong

Ms Maisie Cheng, JP
Director of Environmental Protection
Environmental Protection Department
16/F, East Wing, Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Ms Cheng,

Producer Responsibility Scheme – Plastic Beverage Containers

The American Chamber of Commerce is one of the largest international business chambers in Hong Kong, and on behalf of our members, is pleased to be able to respond to this important public consultation exercise.

Back in 2014, the Chamber strongly supported government's longer term plans to both reduce waste and for the extension of landfills and to develop Hong Kong's first waste incinerator. Whilst these latter two developments can help buy time for other measures to work, we do feel it is now time to ramp up efforts to increase the recycling of key 'waste' items and strengthen the circular economy in Hong Kong.

We are therefore supportive of the proposed PRS Scheme and have pleasure in enclosing the View Response Form, duly completed, and trust that the government will continue to bring forward additional measures to facilitate both recycling and a reduction in the overall level of municipal solid waste.

Yours sincerely,

Tara Joseph
President

Encl.

Public Consultation on PPRS

Email: pprs@epd.gov.hk
Post: Waste Management Policy Group
Environmental Protection Department
Rm. 1501, 15/F, Chinachem Exchange Square, 1 Hoi Wan Street
Quarry Bay, Hong Kong
Fax: 3121-5761

Annex B: View Response Form

Part I: Basic Information

Which of the following identities are you using to respond to this view response form?

<input checked="" type="checkbox"/> Professional Bodies / Institutions	<input type="checkbox"/> Public Organisations	<input type="checkbox"/> Green Groups
<input type="checkbox"/> Industry Associations	<input type="checkbox"/> Companies	<input type="checkbox"/> Others
Name of Organisations / Companies: <u>American Chamber of Commerce in Hong Kong</u>		
<input type="checkbox"/> Individuals		

Email Address: amcham@amcham.org.hk

Part II: Consultation Questions

Q1: Do you support introducing a mandatory PRS to enhance the recycling of plastic beverage containers?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q2: Do you agree that the PPRS should cover beverage products within the volume range of 100mL-2L?

<input type="checkbox"/> Strongly Agree	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Neutral	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly Disagree
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Q3: Do you support the provision of rebate under the proposed PPRS?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q4(a): Do you consider a rebate at 10 cents per container an appropriate level?

<input type="checkbox"/> Strongly Agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neutral	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Strongly Disagree
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Q4(b): If not, what should be the minimum rebate level?

<input type="checkbox"/> 5 cents	<input type="checkbox"/> 20 cents	<input checked="" type="checkbox"/> 30 cents
<input type="checkbox"/> Others (please specify) :		

Q5: Do you support that relevant retailers (in particular the larger retail stores) should be mandated to provide take-back and rebate redemption services?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q6: 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
1	6	3	4	5	2
<input type="checkbox"/> Others (please specify) :					

Q7: 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?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q8: 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?

<input checked="" type="checkbox"/> Strongly Agree	<input type="checkbox"/> Agree	<input type="checkbox"/> Neutral	<input type="checkbox"/> Disagree	<input type="checkbox"/> Strongly Disagree
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Q9: Do you support imposing licensing requirement on recycling facilities for handling the waste plastics collected under the proposed PPRS?

<input checked="" type="checkbox"/> Strongly Support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	<input type="checkbox"/> Strongly Oppose
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Q10(a): Do you have any specific suggestion(s) on promoting eco-packaging design?

Government should work closely with businesses in this sector and NGOs to regularly review both design options and in future to review the effectiveness of this PRS scheme.

Q10(b): Do you have any other comments on the PPRS and other plastic-related issues?

Given the imposition of the levy, suppliers may seek to escape the PRS by turning to packaging which is not covered (e.g. laminated/waxed board/paper) but which is even more difficult to recycle. The scheme design and implementation needs to watch out for this and help prevent it.

-- Thank you for your views --