

By post and by email at comments@susdev.org.hk

24 November 2021

Council for Sustainable Development
21/F, High Block, Queensway
Government Offices,
No 66 Queensway, Hong Kong

Dear Sir/Madam

**Views from The Hong Kong Institution of Engineers
Regarding the Public Engagement on Control of Single-use Plastics**

On behalf of the Institution, I am pleased to present to you our views and suggestions as set out in the enclosure for your consideration on the captioned subject.

The Institution welcomes the opportunity to work with the Government and offer our expertise and experience on the area of concern if and when it is needed.

Thank you.

Yours faithfully



Davis WONG (Mr)
Director

Enc

CKH/DW/SS

Enclosure

Views from The Hong Kong Institution of Engineers Regarding the Public Engagement on Control of Single-use Plastics

In response to the Council for Sustainable Development (SDC)'s final phase of public engagement on reducing major types of waste plastics, in particular seeking views on which single-use plastic products to tackle, the approach for managing them and the timeline with the ultimate goal of mapping out Hong Kong's plan on plastic management, The Hong Kong Institution of Engineers (HKIE) would like to providing following suggestions for the SDC's consideration:

2. As a supporter of this public engagement exercise, the HKIE previously made recommendations on the control of non-essential and hard-to-recycle single-use plastic items and the approach of "Prevention → Refuse → Recycle and Recovery → Proper Disposal" for the sustainable development and mitigation of impacts due to single-use plastics. In short, the less single-use plastic is consumed, the better we can save resources and keep waste out of landfills.

3. The process of extracting and transporting fossil fuels, and the subsequent refining and manufacturing of plastics, generate greenhouse gases that aggravate climate change. Massive production and consumption of plastics will cause pollution as they may persist in the environment for hundreds of years, affecting our ecosystems, endangering animal life and also threatening human health. Accommodating more plastics in landfills would shorten their lifespan and increase methane emission. Single-use plastics are particularly harmful to the environment as they are usually made from low-value and hard-to-recycle plastics and are small in size, which make them even more difficult to be separated, sorted and cleaned for recycling. As such, we hereby reiterate our grave concern about the following:

- a. Single-use plastics are littered in the natural environment, which causes pollution and harm to wildlife.
- b. Use of single-use plastics increases carbon footprint and poses climate change hazard.
- c. Single-use plastics are difficult to recycle and take up valuable landfill space.
- d. The society's over-reliance on single-use plastics promotes a wasteful culture.

Products Recommended to Be Put Under Control

4. To achieve sustainable development, excessive use of plastics must be avoided. In the past years, the Government has been advocating a "plastic-free" culture. To further reduce plastic waste, we strongly agree that different types of single-use plastic products should be put under control in different extent.

5. Local product packaging, local retail packaging and local packaging for logistics and online shopping are used widely in Hong Kong. We suggest controlling these

types of single-use plastic product by regulatory measures in a medium term. It may involve a number of stakeholders e.g. wholesaler and retailers, the logistics trade, consumers, etc. Producer Responsibility Scheme (PRS) or charging should be implemented to encourage people to reduce waste generation as much as possible. Waste avoidance is to get to the root of the problem. However, it is important that the affected sectors are aware of the changes, how these will affect the sectors, how to search for reusable alternatives and what support/resource is available to make a successful transition.

6. Festival and celebration products, plastic umbrella bags, and single-use toiletries such as showering product in small bottles distributed by hotels and plastic stemmed cotton buds produce huge amount of plastic waste which is in fact avoidable. Since possible alternatives are readily available, single-use is not the only choice. Ban or restriction on the use/sale of these single-use plastic products could be implemented to reduce waste generation and the burden to landfills. As such, relevant restriction measures on their use/sale as a short-term action is proposed.

7. For supplementary tool sold together with a product for its usage/consumption and miscellaneous items (e.g. signage for meetings, conventions and exhibitions), a voluntary scheme, for example to improve product designs, or a trade charter scheme could be initiated in a short term to reduce waste generation.

8. In addition, the Government should enhance recycling networks, promote the use of alternatives, strengthen public education and publicity activities on proper source separation and clean recycling.

Enhancement to Plastic Shopping Bag Charging Scheme

9. The Environmental Levy Scheme on Plastic Shopping Bags (PSBs) is the first Producer Responsibility Scheme introduced in 2009 aiming to reduce the excessive use of plastic shopping bags through a direct economic disincentive imposed on consumers as a mandatory charge. It was fully implemented to cover all retail outlets with effect from 1 April 2015 and has achieved an encouraging result. To further encourage consumers to refrain from using PSBs indiscriminately, we agree to strengthen the existing regulatory measures in place. Reinforcing direct economic disincentives can increase the motivation to reduce use of PSBs. In particular, we strongly agree that the current exemption for PSBs carrying frozen/chilled foodstuff in airtight packaging can be removed. Furthermore, foodstuff already fully wrapped by non-airtight packaging should not be provided with free PSBs. Only one PSB should be exempted for carrying foodstuff that is not fully wrapped by any packaging. To take a step further, a slight increase in minimum charging level (say to HK\$1) may discourage public from using a PSB.

Facilitate Stakeholders' Understanding of the Matter

10. Public education and publicity activities should be organised to promote green purchase. Information on green products and green shopping tips can be shared via formal (e.g. promulgation of practical guides, official website, etc) and informal (e.g. Facebook, Instagram, etc) channels. Equipping consumers with better green knowledge could help them to take green concepts into consideration before each purchase. We are of the view that it would be helpful for consumers to make an informed purchase decision if more information on the recyclability and percentage of recycled content of a single-use plastic product is provided by the manufacturer. Also, it is agreed that there is a need to develop a platform for sharing information on plastic alternatives among different stakeholders including businesses, material suppliers and consumers.

Green Considerations Affecting Consumers' Choice

11. We believe the market of single-use plastics is heavily consumer-driven. It is essential to build a “green consumer shopping habit” with a view to revolutionising the market. As green consumers, citizens should develop the habit of bringing our own bag/bottle/box, buying products with minimal packaging, reusing packaging materials as far as possible and practising clean recycling. When making eco-friendly shopping decision, factors that should definitely be considered include the product’s reusability, the type of “green material” used, the brand’s “corporate environmental responsibility”; and whether the product is over-packaged or not.

12. We understand replacing plastics by non-plastic/reusable alternatives may drive up the costs of the products. The cost burden would likely be shared by consumers. To reduce the use of single-use plastic, we consider it would be affordable and acceptable by the general public to pay an additional cost of less than 5% of the product price on the same product made from non-plastic/reusable plastic (ie HK\$10.5 for a non-plastic/reusable item as an alternative for a single-use plastic item that costs HK\$10).