

By post and by fax at 3529 2837

27 November 2015

Clerk to Bills Committee  
Legislative Council Secretariat,  
Legislative Council Complex,  
1 Legislative Council Road,  
Hong Kong

[Attn: Miss Mandy POON]

Dear Miss POON

**Views to Bills Committee on Promotion of Recycling and Proper Disposal  
(Product Container) (Amendment) Bill 2015**

Thank you for inviting the Institution to put forth our views on the captioned subject.

In response to your invitation, the Institution is pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you for your attention.

Yours sincerely



Ir CHAN Chi Chiu  
President  
The Hong Kong Institution of Engineers

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**Enclosure**

**Views from the Hong Kong Institution of Engineers to  
Bills Committee on Promotion of Recycling and Proper Disposal  
(Product Container) (Amendment) Bill 2015**

The Hong Kong Institution of Engineers (HKIE) would like to express our support to introduce and pass the captioned Bill to amend the relevant Ordinances for the ultimate purpose of enhancing environmental protection in Hong Kong.

2. We note that the Government is planning to employ a statutory regulatory framework for the implementation of a mandatory producer responsibility scheme (PRS) on product containers which include glass beverage containers, and to collect the recycling levy from the registered suppliers of regulated articles.

3. Glass containers are widely used in our everyday life. However most of the waste glass containers generated in Hong Kong are disposed of at landfills rather than being reused or recycled. According to the data from Environmental Protection Department, in 2013 the waste glass containers constituted about 2.7% of our daily municipal solid waste (MSW) disposal including about 166 tonnes per day of glass beverage containers, about 85 tonnes per day of glass fold / sauce containers and about 7 tonnes per day of other glass containers.

4. The HKIE has much concern on devising feasible and effective ways to protect our environment and to conserve resources. We expect that Hong Kong should intensify its endeavours to pursue the 3Rs principle for “reduce, reuse and recycle”. We note that the captioned Bill can in a certain degree facilitate more reuse and recycling of product containers, which in the long term not only soothes the burden of waste management, but also instills better habit within the community of minimising waste creation.

5. As the practical experience from the various voluntary glass recycling programmes could tell, high logistics cost is one of the key impediments to efficient collection of waste glass containers for proper recycling.

6. Whilst we agree to implement PRS as one of the measures to increase the amount of glass recycling instead of disposing in landfills, only collecting recycling levy from the registered suppliers may not be effective in reducing the amount of disposal. The money paid for recycling levy may probably be charged on the cost of the beverage. The consumers may pay a bit more in buying the products but they will not have any incentive to recycle the used glass containers.

7. The Government may consider, if appropriate, that some responsibility to be shouldered by the end users, similar to the charge for using plastic bags. It is also

proposed that part of the levy collected could be used for paying to the end users who return the used glass containers to shops and for paying the shops who transport the collected glass containers to the recycling operators. This is similar to the practice that people had in the past for the return of used glass bottles. The levy may serve as a subsidy as well as an incentive for the glass containers recycling operation.

8. The HKIE welcomes further public consultation for the proper implementation of the proposed scheme under the captioned Bill. The Government is also suggested to better monitor and manage the situation to ensure the effectiveness of the scheme. We also hope that the passing of this Bill will pave the way for phased extension of the scheme to other types of containers when circumstances allow.