

May 20 2021

Waste Management Policy Group  
Environmental Protection Department  
Room. 1501, 15/F.,  
Chinachem Exchange Square,  
1 Hoi Wan Street,  
Quarry Bay, Hong Kong.

Dear Sir/Madam,

**Producer Responsibility Scheme on Plastic Beverage Containers**

In response to the consultation document (“Proposal”) published by the Environment Protection Department on 21 February 2021 seeking public views on a Proposed Producer Responsibility Scheme on Plastic Beverage Containers (“PPRS”) for implementation in Hong Kong, The Hong Kong Food Drink & Grocery Association (“FDGA”) would like to fully endorse the attached response/position of The Hong Kong Beverage Association Limited (“HKBA”).

Some of the key recommendations that FDGA would like to emphasize are the following:

1. Reconsider the scope of the PPRS with a view to better (i) involving all relevant stakeholders, (ii) recognising their respective shares of responsibility and (iii) requiring them to play their respective roles (i.e., in money or in kind, or both) with the possibility of making such responsibilities mandatory where practicable, for instance, gatekeeping responsibilities along the distribution process (e.g., retailers ensuring their products have been duly levied, barcode-registered and recycling logo printed); logistics support; space provisions; manpower resources; prescribing guidelines for proactive participation at schools, residences, workplaces, venues, facilities, etc.);
2. We urge the Government to fully assess the possible profound impact of such “green taxes” on the business environment and the economy with a view to ensuring that any adverse impact would be thoroughly assessed before implementation and, wherever possible, minimised.
3. Allow key stakeholders such as Suppliers to participate in the setting up, supervising and operating of the PPRS to ensure that those who know the market best will be sufficiently involved; and
4. Ensure a high degree of transparency in the running, supervising and financing of the PPRS.

FDGA believe that all relevant policy initiatives should be consistent with the Government’s overarching principles of “polluter pays” and “shared responsibility”. Any such initiative should not



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seek to disproportionately and unfairly place any undue burden on Suppliers alone and do so without sufficient justifications as presently put forward in the Proposal.

Thank you for providing us the opportunity to participate in the formulation of the PPRS. We look forward to your positive response.

Yours truly,

A handwritten signature in blue ink, appearing to be 'Steven Co', written over a horizontal line.

Mr. Steven Co  
Chairman, The Hong Kong Food Drink & Grocery Association

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*FDGA (formerly the Liquor and Provision Importers Association - LPIA) has been very active since it registered as a society on October 17, 1973. FDGA has become well-known in official circles. It is a well-established, independent and solid representation for 30 food and beverage companies. To know more about FDGA and its members, please go to [www.fdga.org.hk](http://www.fdga.org.hk).*