

13 January 2023

Dr CHUI Ho-kwong, Samuel, JP
Acting Director of Environmental Protection
Environmental Protection Department
16/F, East Wing
Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Dr Chui,

**Re: Consultation on the Specifications for Product Barcode and Designated Logo for
Producer Responsibility Scheme on Plastic Beverage Containers (“PPRS”)**

The Hong Kong General Chamber of Commerce welcomes the opportunity to respond to the captioned consultation.

As an advocate for waste reduction, we recognize the need for an appropriate and effective policy for handling plastic waste. While we understand the rationale behind the proposals for a designated product barcode and logo, we suggest that greater flexibility be afforded to such an arrangement to avoid any unintended consequences of discouraging efforts to reduce plastic waste.

Our comments are set out in the attached. We hope you will find our comments useful.

Yours sincerely,



George Leung
CEO

Encl.



Hong Kong General Chamber of Commerce
香港總商會 1861

**Public Consultation on the Specifications for Product Barcode and Designated Logo for
Producer Responsibility Scheme on Plastic Beverage Containers (“PPRS”)
Response by the Hong Kong General Chamber of Commerce**

1.1. The Hong Kong General Chamber of Commerce (“HKGCC”) welcomes the opportunity to respond to the captioned consultation.

1.2. As an advocate for waste reduction, we recognize the need for an appropriate and effective policy for handling plastic waste. While we understand the rationale behind the proposals for a designated product barcode and logo, we suggest that greater flexibility be afforded to such an arrangement to avoid any unintended consequences of discouraging efforts to reduce plastic waste. The following sets out our responses to the various issues raised in the Consultation Paper (“CP”).

2. Product Barcode

2.1. It is proposed that a product barcode with predefined dimensions that can be readily read by both reverse vending machines (“RVMs”) and barcode scanners be affixed to recyclable beverage containers. Otherwise, approval would be required. Such a prescriptive approach is fraught with rigidity and could result in the retrograde and undesired outcome of necessitating the use of more plastics. For instance, some beverage suppliers have begun to print barcodes on bottle caps instead of label wraps to eliminate the use of packaging materials. Given the limited space on bottle caps, it follows that the barcode size would also be reduced and, under the proposed arrangements, fall outside of the specifications thereby triggering the need to obtain approval. The proposal would therefore be antithetical to the intended purpose of facilitating waste reduction not to mention an impediment to innovative and eco-friendly packaging designs aimed at cutting down plastic use. For the reasons as given in the foregoing, we suggest that allowances be provided on the design of barcodes in terms of their size and colour as long as they can be read by RVMs or barcode scanners.

2.2. The suggestion for readability by either RVMs or barcode scanners instead of both is made out of practical considerations; existing RVMs are not equipped to read product barcodes that are printed on non-conventional areas of beverage containers as in the case of bottle caps as mentioned in the preceding paragraph. The capability to do so would ultimately rest with the Scheme Operator.

As such, consideration should be given to the requirement that advanced RVM models be adopted to accommodate different container designs and barcode placements.

3. PPRS Logo

3.1. Under the proposed arrangement, a designated PPRS logo is required to be printed or affixed on the body of individual beverage containers, preferably next to the product barcode. This may not be an issue for locally produced goods or imported products for which importers/retailers could add a label before these are brought to market. However, this could be problematic in the case of imported beverages that enter Hong Kong as multi-packs - individual products pre-packed in bundles. Under such circumstances, the logo can only be added to the packaging for such bundles rather than individual containers. Industry guidance would therefore be necessary from the Government to address such a circumstance.

3.2. With respect to the PPRS logo, it is proposed that the colour schematic and dimension should respectively be in black against a white background and no smaller than 12mm x 12mm. As with comments on the proposed placement of the barcode, we suggest that some degree of flexibility be allowed in the interest of encouraging innovative designs that promote the minimization of packaging materials at source and also lend themselves to recyclability. To that end, discretion should be provided for suppliers to decide on the design and placement of the logo. This includes relaxing the colour requirement so long as the logo is visually prominent, and reducing the minimum dimension to 10mm x 10mm to accommodate logo placement on smaller surfaces.

3.3. Furthermore, the proposal to position the logo close to the barcode may not be viable in practice because for certain products such an approach could have the effect of obscuring other mandatory labelling requirements such as those for nutrition information. To avoid such a development, the PPRS logo could be incorporated with nutrition label stickers to facilitate visibility for all requisite product information.

Other Comments

4. Types of Beverage

4.1. It is noted that under the proposed PPRS, the term “beverage” is defined as a *ready-to-serve drink, or a product that is a liquid or consists of liquid and is commonly served as a drink after being diluted or reconstituted*¹ under the Promotion of Recycling and Proper Disposal (Product Container) (Amendment) Ordinance 2016. However, it is unclear whether such beverage products also extend to herbal or health drinks. Clarity on the beverage types that would fall under the scope of PPRS would therefore be necessary.

¹ <https://www.gov.hk/en/residents/government/publication/consultation/docs/2021/Plastic.pdf>

5. Grace Period

5.1. Under the Government's existing timetable, the proposed PPRS is expected to come into force in 2025. We suggest that the Government provide an 18-month preparation period after confirmation of the PPRS, followed by another 18-month grace period upon enactment of the scheme. The preparation period would allow sufficient time for beverage suppliers and vendors along the supply chain to assess and make appropriate adjustments in designs, sourcing and production scheduling across all product lines to comply with the new requirements, while the grace period would allow a transition which minimizes wastage that would otherwise arise due to a shorter window for a switch in product design and materials used in production lines.

HKGCC Secretariat
December 2022