

December 3, 2021

Dr the Hon LAM Ching-choi, SBS, JP  
Chairman of the Council for Sustainable Development  
21/F, High Block, Queensway Government Offices  
No. 66 Queensway  
Hong Kong

Dear Dr. Lam,



**The American Chamber  
of Commerce in Hong Kong**  
Rm 602, Two Chinachem Central  
26 Des Voeux Road Central  
Hong Kong

**Public Engagement on the Control of Single-use Plastics**

The American Chamber of Commerce (“AmCham”) is one of the largest international business chambers in Hong Kong, and on behalf of our members, is pleased to be able to enclose our response to this important public consultation exercise.

Since 2014, AmCham has been expressing strong support for the government's long-term objectives to minimize waste, expand landfills and to build Hong Kong's first waste incinerator. However, plastic wastes cannot be recycled and landfill sites should not be considered a sustainable solution for plastics waste disposal. It is imperative for Hong Kong to ramp up efforts to further decrease household plastic waste and alleviate plastic pollution.

AmCham supports the Government's overall approach to the control of single-use plastics, but would like to highlight two areas of concerns. In response to Question 2, AmCham agrees that meetings, conventions and exhibitions are a major source of waste to consider. However, the category “miscellaneous” is too vague; a clearer definition of high-priority items or refer to a specific standard would be strongly recommended. Alternatively, the Government should consider tackling other well-defined items first. As for Questions 3.1 and 3.2, whilst single-use plastic packaging creates unnecessary waste, food hygiene and the avoidance of cross-contamination in home transit is an important consideration. COVID has reinforced the need to prevent multiple hands touching products which then need to be cleaned up, with the risk of germs still being transmitted or damage which could result in wastage. AmCham therefore recommends hygiene-related items (e.g. those related to reducing COVID transmission) be exempted.

To effectively tackle single-use plastics and promote a plastic-free culture, it is necessary to consider different measures for products of different nature. Some may be treated with short-term action via a voluntary code (e.g. hotel toiletries), while other products may require a longer lead time (e.g. fresh meat containers) and a combination approach – voluntary measures (e.g. recycling), followed by regulation when real alternatives are available.

AmCham looks forward to candid dialogue with the Government in providing further recommendations on the city's long-term sustainable development. Please do not hesitate to contact me, or Director of Communications & Government Affairs Queenie Tsui at [qtsui@amcham.org.hk](mailto:qtsui@amcham.org.hk).

Yours sincerely,

Tara Joseph  
President  
Encl.