



Kinko Wong

14/08/2015 21:55

To wco_consultation@epd.gov.hk

cc

Subject Submissions on the legislative proposals on regulation of edible fats and oils and recycling of "waste cooking oils"

Urgent Return receipt Sign Encrypt

Dear Sir/Madam,

I am writing to submit my views on the captioned in addition to a hardcopy submission posted today. Enclosed please find the said submission.

Best regards,



Kinko Wong 14.08.2015 Submission on the Legislative Proposal Regulating Waste Cooking Oil.docx

Waste Reduction and Recycling Group
Environmental Protection Department
28/F, Southorn Centre
130 Hennessy Road
Wan Chai
Hong Kong

Date: 14 August, 2015

Dear Sirs

Invitation for submissions on the legislative proposals on regulation of edible fats and oils and recycling of “waste cooking oils”

I am writing to express my opinions on the captioned topic. I am in favour of the proposed legislative framework for regulating “waste cooking oils” (‘WCO’) with the following measures in particular:

- (a) setting up a licensing system for collectors/ recyclers/ importers/ exporters of WCO;
- (b) putting in place export regulatory arrangements by requiring exporters to acquire a permit to cover all export shipments of WCO in addition to the said license;
- (c) keeping documentary records of the transaction of WCO including the date on which WCO are collected, respective quantities and information of the collectors/ recyclers; and
- (d) requiring restaurants and food factories to dispose WCO to authorized collectors, disposers or exporters mandatorily.

However, I wish to see more stringent regulations on used cooking oil for the sake of the community and the overall image of Hong Kong as an international city. My proposed measures and their reasons are set out as follows:

- (a) to ease the shortage of WCO to local recyclers, a statutory duty should be imposed on restaurants and food factories to give preference to disposers in lieu

of collectors and exporters in disposing WCO given the fact that the largest biodiesel manufacturer in the city can only recover 30 per cent of used cooking oil generated locally and must import WCO from other places¹;

- (b) to discourage restaurants and food factories from selling WCO at higher prices to unscrupulous dealers, incentives should be provided to restaurants and food factories in selling WCO to designated or reputable recyclers in Hong Kong;
- (c) to ensure WCO does not enter the city's food supply for re-use or human consumption, a high threshold should be adopted in granting licenses and great emphasis should be put on the purpose of WCO collection in formulating the licensing requirements, which preference should be given to legit and innovative purposes such as production of biodiesel;
- (d) to promote a more eco-friendly environment and to safeguard a clear system of traceability with the movement of WCO, it is suggested to restrict the use of WCO only for the purpose of industrial applications.

I sincerely hope the government can give a thorough consideration on the aforementioned suggestions.

Yours faithfully,

Kinko Wong
