



05/10/2015 12:52

To <wco\_consultation@epd.gov.hk>

Subject Submission regarding Legislative Proposals on  
Regulation of Edible Fats and Oils and Recycling of  
"Waste Cooking Oils"

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Dear Sir/Madam,

Enclosed please find the submission from our association.

Sincerely,  
Victor C. Li  
Chairperson  
Hong Kong Waste Management Association



2 Oct 2015- HKWMA comment on Legislative Proposals on Waste Cooking Oil.pdf



香港廢物管理學會

Hong Kong Waste Management Association

5 October 2015

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

By Email: [wco\\_consultation@epd.gov.hk](mailto:wco_consultation@epd.gov.hk)

Dear Sir/Madam,

Re: Legislative Proposals on Regulation of Edible Fats and Oils and Recycling of  
“Waste Cooking Oils”

Hong Kong Waste Management Association (HKWMA) is the premier organization representing professionals in Hong Kong’s solid waste management and environmental industries and we take an active interest in all areas represented by our membership. Since our inauguration 21 years ago, HKWMA has been witnessing the evolution, needs and challenges of waste management issues in Hong Kong.

Regarding the captioned proposal, HKWMA hereby responds to the relevant section and strongly supports to legislate the recycling of Waste Cooking Oils within Hong Kong.

From the process of waste generation, collection to recycling/disposal/export, the Waste Disposal Ordinance (Cap. 354) should be in place to govern the flow of materials and accountability of different stakeholders. Under this context, registration of waste producers, licensing of collectors and monitoring of the handling activities are essential to properly manage the Waste Cooking Oils generated within Hong Kong.

Our association supports the licensing approach to environmentally sound treatment and recycling facilities in Hong Kong for Waste Cooking Oils. These facilities should be properly monitored and regulated for their processing and treatment. There should be an objective and transparent mechanism to review and define the acceptable

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quality/level of recycled materials that are not for edible purposes and fit for export/reuse. One feasible mechanism could be the HKQAA – Waste Cooking Oil Collectors and Processors Registration (HKQAA – WCOCR) scheme that audits extensively on any operator seeking a Hong Kong license to recycle Waste Cooking Oils for further selling in Hong Kong or export to overseas markets.

While Hong Kong will continue its role as a free trade port, there will be import and export activities of Waste Cooking Oils. We are convinced the presence of import/export permit system under Basel Convention would safeguard the materials being properly processed and used in a non-edible application while answer to the public interest at large.

Furthermore, licensing requirements should be determined in close cooperation with the industry to assure that the industry remains competitive and efficient. Relevant measures should take account of the potential business impact to the concerned stakeholders. We should avoid that the licensing requirements have a negative impact on the collected volumes of Waste Cooking Oils and the Environment of Hong Kong.

Last but not least, apart from legislation and enforcement, the proper management of Waste Cooking Oils is largely dependent on public education of which we urge the government to strengthen communications and education under this aspect.

Thank you very much for your attention.

Faithfully yours,

Victor C. Li  
Chairperson

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