



05/10/2015 14:48

To wco_consultation@epd.gov.hk

Subject Consultation Document - The Hong Kong Recycle of UCO Association

Urgent Return receipt Sign Encrypt

Dear Sir,

Attached please find the consultation document from The Hong Kong Recycle of UCO Association in regards of legislation consultation on used cooking oil.

Any further information request, please do not hesitate to contact me direct.

Best Regards,

Fred Mok



UCO consultation document.pdf



香港廢食油回收總會

The Hong Kong Recycle of UCO Association

Date: 3rd October 2015

The Hong Kong Recycle of UCO Association
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Dear Sir,

Re: Consultation document with suggestion plan (區區有油收計劃)

On behalf of The Hong Kong Recycle of U.C.O. Association, I agreed and accepted Hong Kong Government set up legislations on control and regulate of used cooking oils' workflow.

Introduction of U.C.O. status in Hong Kong.

The used cooking oil is recycled from local restaurants. It is a good source for biodiesel refineries and feedstock production.

- At present, legislation is already in place on the Mainland to prohibit import of used cooking oil but currently we still waiting for new legislation in Hong Kong against or control the import and export of such oil.
- A major share of the used cooking oil produced by local food establishments is purchased or recovered for shipment to the Mainland or outer Hong Kong region, where it is "processed" and reused improperly for cooking purposes, which seriously



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endangers the health of the people on the Mainland and in Hong Kong.

- Hong Kong has a plethora of restaurants generating used oil and grease. In the past, this was often simply poured into drains, and the Drainage Services Department used to spend tens of millions of dollars every year to clear blocked drains
- In Hong Kong, 25,000 tones of used cooking oil are generated annually. But just 30 – 40 per cent of that amount – about 8,000 tones – is recovered by the biodiesel makers.
- The bulk of the remainder is likely to make its way back into the food chain after being processed and sold to oil suppliers elsewhere.

Industry perspectives

- From the view of manufacturers, scandal over sales of tainted lard from Taiwan has been a source of bitter satisfaction for Hong Kong's handful of biodiesel producers. It's helped shine a spotlight on a warped market that encourages restaurants and catering operations to sell used cooking oil at higher prices to unscrupulous dealers, only to have it return to local kitchens in the form of lard or other oil and fat mixed with "gutter oil".
- The choice is obvious when recyclers are offering commercial kitchens as much as HK\$75 for a 15 kilogram barrel of used cooking oil, at those prices, no one could run a viable recycling business turning used oil into biodiesel and soap, the only way recyclers would be able to make money was if the used oil was sold as a commodity for human consumption.
- Failure to regulate used oil has also allowed dishonest processors to pollute the environment. Reputable recyclers invest in treatment systems to convert the dirty cooking oil into biodiesel and glycerol – typically it is heated and filtered to remove bits of food and other contaminants before being combined with alcohol and a catalyst such as lye. But other operators simply boil the used oil to remove water, and strain out the solid contaminants before dumping the waste.



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Collector perspectives

- Collectors facing the obstacles in existing market includes currently they did not see any control on Government level which reflected when eating and drinking outlets handling of their used cooking oil in which should be complied, so they could freely distributed their used cooking oil to anyone that they don't know but with high price; also leads some people in the industry freely distribute their UCO to some un-identified parties to overseas which could turn back to Hong Kong somehow and finally back to citizen's dining table in which ruins citizen's health as well as the entire environment , also damage the reputation of Hong Kong.
- The phenomenons of the current market in eating and drinking industry are less than 10% of outlets who are willing to properly handle the UCO.
- Some people would like to gain profit from re-sell their UCO back to mainland China and gain profit that create opportunity to let people making illegal cooking oil and selling back to the market.
- Large establishments such as chain and group may have deeper consideration on handling of UCO after they generated it, they might looking for some experiences people in the industry to handle but seldom check with their background and did not care where their used cooking oil goes.
- Pricing issue affect the collecting industry that collectors might face situations that food operators selling their UCO in high price, and that caused collectors failed to collect UCO in regular or reasonable standard, those UCO might shift away to other unknown areas or finally turn back to our dining table.

Caterer perspectives

- Most of the caterer found that they facing a serious problem on how to select a right collector, many people claimed themselves are legal collector, but no one can prove. Individual food operators worry about the collecting schedule of UCO may not be consistently followed that will lead to a serious situation on



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storage issue.

- Caterer also scared that should they pay for the people who taking care of their UCO in near future? That creates them a cost burden.
- Does the market have enough collectors for them to select and how to control their services quality and guarantee they are not against the law.
- What is the definition of Used Cooking Oil? How to access? Any scientific methods to measure their oil in kitchen are already became used cooking oil? Who tell them? Will they fall into breaching the rules or law but they don't know?

Other perspective

Problem

- As people in UCO industry may knows, UCO is not disposal product, but a commodity, with fluctuating price from time to time, currently no laws and ordinance regulating the market, people from anywhere can get UCO from catering outlet and resell them then obtain benefit.
- There are many possibilities for people using UCO to create harmful food product not because of anything but with cheaper cost.
- Transporting UCO to other countries or mainland China may also caused the same problem as mentioned above and damage our city's reputation.
- People in industry with no guideline, no self discipline to handle and collect UCO in market, create huge health problem in people's life.
- No law or ordinance to regulate the market, we did understand Government did not involve too much with reason of sustain a "Free Market" concept.

Needs



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- In Market, should to be regulated by using of different measures, controls and educations.
- In Trade, licenses should be issued to those player in industry in which should comply with laws, ordinances or requirements.
- In society, people should recognized where is the healthy food provider from a "recognized badge or label"

Education

- There is no channel that promotes or educate stakeholders on how to dealing with using cooking oil in their workplace!

Career

- No official path to let people to join in the recycle used cooking industry, e.g. recycle assistant in recycle industry (UCO collectors)

Solutions

1. Government should take the lead to issue licenses for collecting and disposing of used cooking oil.
2. Regulate and inspect of UCO handling process and procedures by Food and Environmental Department with duty and responsibility.
3. Establishing related workshops to trade, educating a correct manner and requirements on handling of UCO to food industry.
4. Provide resources to trade in sustain a regular practice in collecting and dispose of UCO.
5. Recommend people using of Biodiesel and Government should take the lead and support with scheme.
6. Create career opportunities in recycling of UCO industry
7. Establish district UCO collecting station for people not only trade to dispose their UCO.

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Feature - Benefits Table For Proper Handle of UCO

Features	Benefits
License system	Manage and Control in line
Workshop and Promotion	Industry player change their mindset and attitude
Fixed district collecting stations	People can self disposed their UCO in a right place
Resources support in trade	Minimized Government manpower and management effort
Encourage using of Biodiesel	Environmental protection and citizen health protection
Career Opportunity in UCO recycle industry	Create opportunity for low education and non skill people to earn their life



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Propose the following solution for consideration.
(Chinese Version)

廢食油回收 - 區區有油收計劃

目標:

將於全港各區設立多個面積不超過2平方呎的廢食油回收站
(十九區包括離島均可參與)

伙伴:

非牟利社區團體(NGO); 環保團體; 酒樓, 餐廳及一般會生產廢食油的食肆

益處:

- 1) 將廢食油轉廢為能;
- 2) 防止廢食油重回餐桌中; 為市民健康把關;
- 3) 製造多個就業良機; 就業對象為低學歷, 低技能, 長期失業, 綜援人仕, 年長但體格強健者。

障礙:

- 1) 坊間對廢食油的認知太小。
- 2) 為牟取暴利而妄顧市民健康者眾。
- 3) 政府執法規管力度強或弱會有不同的市場反應及效果。
- 4) 牌照要求定立有約束力的標準; 為避免業界有害群之馬, 政府監控尺度實為重要, 否則市場會變成“石王管”狀態。

資源:

其實政府現時具備很多條件去執行“區區有油收計劃”例如設收油站於垃圾站中的一角便可, 或設立港九新界各區指定地點; 另外如設備上能得到政府的配合, 計劃便來得暢順。

團隊:

我會(香港廢食油回收總會)會以共同信念去成就強而實在的團隊;
推動及執行區區有油收計劃。

宣傳及教育:

透過地區組織及非牟利機構, 舉辦不同形式的宣傳、講座及教育; 帶出如何處理廢食油的重要性為推動當中的理念。



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計劃內容:

- 1) 建立回收廢食油行業成為專業：
 - a) 與社區組織合辦課程
 - b) 推動環保回收業理念及態度
 - c) 闡述行業可持續發展的機會及路徑
 - d) 提供協助失業及低學歷和低技術人仕就業的機會
- 2) 與社區組織合辦廢食油回收講座及宣傳; 傳達正確處理廢食油的重要性。
- 3) 尋找合適地點安放廢食油回收桶或器皿。
- 4) 以五大信念組織各區的回收團隊。
- 5) 提供在職或職前訓練。
- 6) 設立有制度及有要求的管理。
- 7) 建立運輸團隊網絡及運作標準。
- 8) 與生物柴油廠建立合作協議，減低重覆資源或資源錯配，並共同推動廢食油轉廢為能的理念。
- 9) 配合政府對處理廢食油的政策並配合宣傳。

計劃實行:

本會會員(亞洲生物柴油回收有限公司)早在今年年初與香港聖公會麥理浩夫人中心(NGO)以展開“區區有油收”初步計劃,得聖公會麥理浩夫人中心的協助已試辦形式招募了一班綜援人仕參與為期三天訓練課程,並加每人最少兩天實習及實地回收廢食油的工作體驗過程,並得到中心及所有學員的高度評價,更有學員表示希望長期地參與這回收工作。

本會兩會員結盟

本會會員(亞洲生物柴油回收有限公司)及(倡威科技有限公司)當他們同獲得由香港品質保證局(HKQAA)舉辦的廢食油回收認證後,在計劃中曾經承諾將不會把回收來的廢置食用油重回到餐桌中,以及今年七月中同時得悉政府將為回收及處理廢食油立法,故此他們雙方管理層通過長時間商討後,達成共識,並於今年十月二日記者招待會中簽定協議並向業界及持份者公告,實行共同理念,為環保齊齊出力。



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與餐務管理協會-環保及衛生委員會

本會已與餐務管理協會-環保及衛生委員會合作聯合不同團體及機構處理回收廚餘之外，亦就如何一併處理回收廢食油的計劃進行研討。
並且得到國際食品安全協會及香港廢食油回收總會支持計劃。

與亞洲生物柴油回收有限公司

本會與亞洲生物柴油回收有限公司合作推行“良心企業計劃”，用意在鼓勵食肆將廢食油交予合法回收商並承諾不會重用於餐桌食物中，告之大家正確行為。

願景

我們希望政府如能通過今次立法後，會真正落實執行法例賦予的權力，杜絕不良份子利用廢食油牟取暴利之餘破壞環境影響市民健康。

最後，祝工作愉快，事事順利！

此致

香港廢食油回收總會
主席 莫耀華 謹啟



香港廢食油回收總會

The Hong Kong Recycle of UCO Association

A partial member of The Hong Kong Recycle of U.C.O. Association includes:

1. 亞洲生物柴油回收有限公司 (廢食油收集商)
2. 倡威科技有限公司 (廢食油回收商)
3. 香港餐務管理協會環保及衛生委員會
4. 國際食品安全協會
5. 羅氏清潔服務有限公司
6. 偉達環保科技服務有限公司
7. 耀記運輸有限公司
8. 立興清潔服務有限公司
9. 香港環保再造有限公司

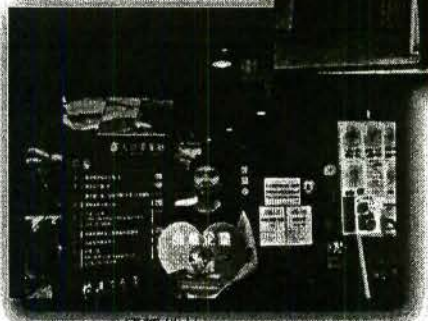
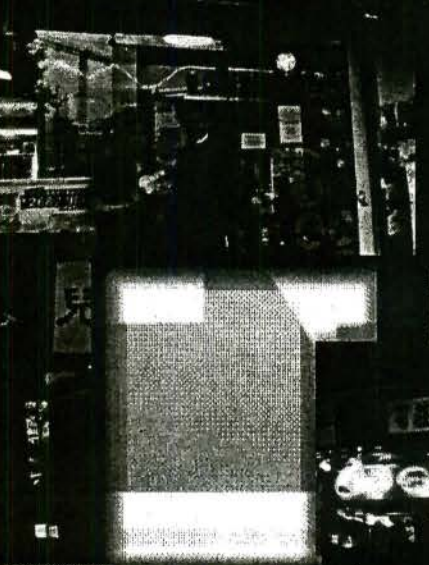
P.S. attached please find a photo file for your reference.



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良心企業計劃



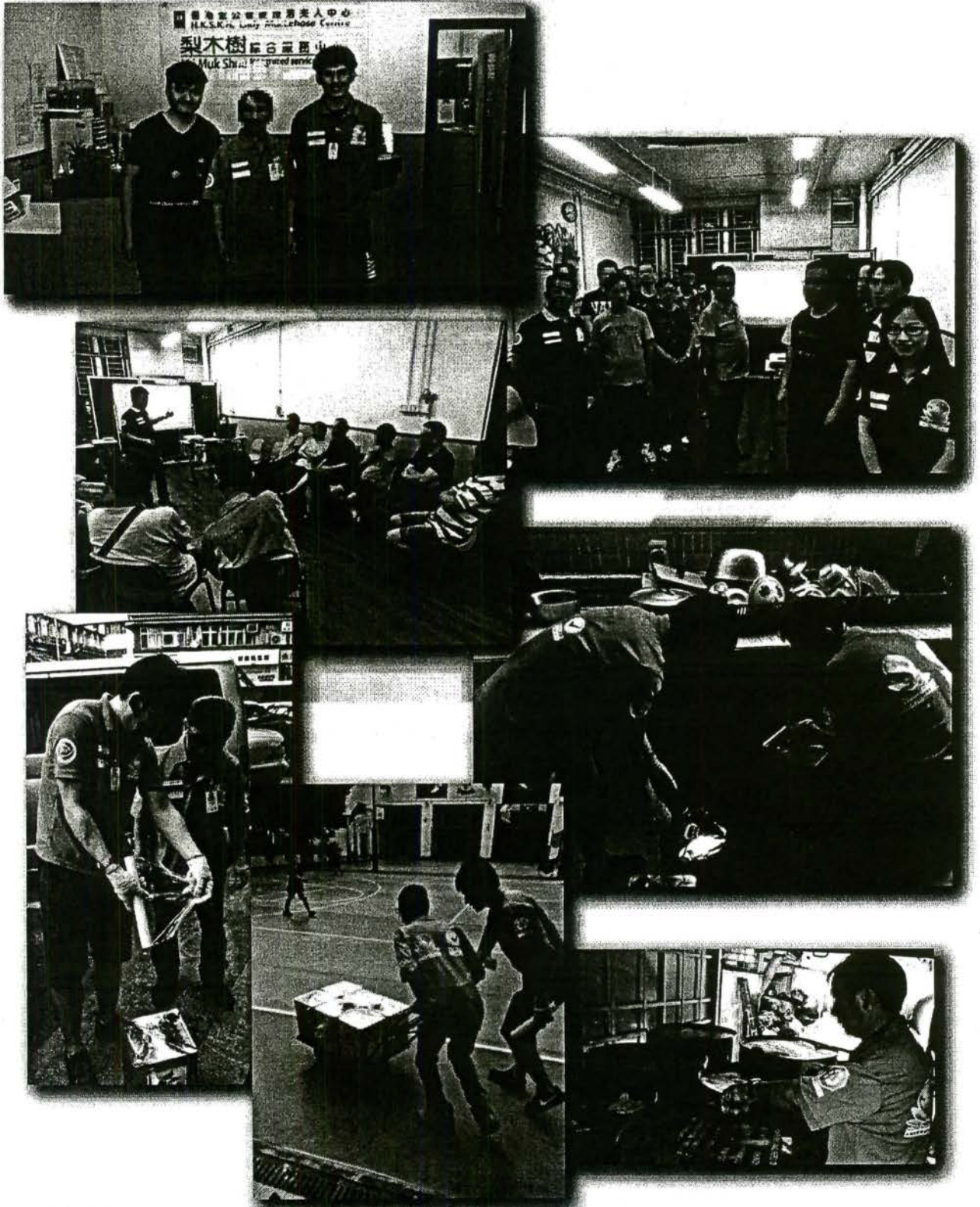
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與香港聖公會麥理浩夫人中心(NGO)以展開“區區有油收”初步計劃



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兩會員結盟 - 亞洲生物柴油回收有限公司 及 倡威科技有限公司



圖片來源：大公報



圖片來源：明報



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