

**Waste Import and Export Control**  
**General Guidelines on Import and Export of "Recyclables"**

## 1. Introduction

“Recyclables” is a common term to denote waste that can be recycled readily. Common types of recyclables imported into or exported out of Hong Kong include metal & metal-alloy waste in metallic and non-dispersible form (i.e. GA & GC)<sup>1</sup> and other recyclables specified in Schedule 6 of the Waste Disposal Ordinance, Cap. 354 (WDO). The WDO requires no permit for import or export of uncontaminated recyclables for genuine reprocessing, recycling, recovery or reuse purposes. This exemption however does not apply to import or export of any waste, including recyclables, for mere dumping.

## 2. Impurity in Recyclables Shipments

Importing recyclables with high impurity content, which has to be disposed of in Hong Kong, for reprocessing, recycling, recovery or reuse will create undue burden to local landfills and such import operation cannot be considered as environmental sound management of waste. Therefore, if the impurity level of a recyclables shipment exceeds a certain unacceptable threshold which prevents its reprocessing, recycling, recovery or reuse in an environmentally sound manner, the shipment is considered contaminated in accordance with section 20I(2) of the WDO.

Reference may be made to relevant national standards on imported solid wastes as raw materials (in the series of GB16487.2-2017 to GB16487.13-2017) to determine the impurity thresholds of specific recyclable types. Impurity thresholds of types of recyclable commonly imported into or exported out of Hong Kong are summarised in table below.

Recyclable Types	Corresponding Categories in the WDO	Impurity Threshold (by weight)	Example impurity
Non-ferrous Metals, including			
- Copper	GA120	1.0 %	Wood, rubber, debris, rock, municipal waste
- Nickel	GA130		
- Aluminium	GA140		
- Lead	GA150		
- Zinc	GA160		
- Tin	GA170		

<sup>1</sup> GA, GB and GC are waste categories in the Sixth Schedule of the WDO.

Recyclable Types	Corresponding Categories in the WDO	Impurity Threshold (by weight)	Example impurity
Ferrous Metals	GA040 to GA110	0.5 %	Wood, rubber, debris, rock, municipal waste
Waste Wire	GC020	0.5 %	

*Example of “Uncontaminated” and “Comtained” Recyclable*



✓ Uncontaminated aluminum recyclable  
(sorted before shipment and contains minimal impurities)



✗ Contaminated mixed waste metals  
(mixed with >1.0% impurities by weight, including debris, wood and wire)



✗ Contaminated mixed waste metals  
(mixed with >1.0% impurities by weight, including rubber, wood and rocks)



✗ Typical impurities found in contaminated mixed waste metals  
(left: sponge, plastics, wood, wire; right: rubber, rock)

### 3. Offence and Due Diligence

Anyone who imports or exports contaminated recyclables without a permit issued by the Environmental Protection Department under the WDO commits an offence. Offenders will be prosecuted and the illegally imported recyclables will be repatriated back to its place of origin. A first offence could be fined a maximum of up to HK\$200,000 plus a 6 month prison term, while a repeated offence could be fined up to HK\$500,000 plus a 2 year prison term.

Importers and exporters of recyclables should exercise due care and adopt all reasonable precautionary measures to ensure that no contaminated recyclables are imported into or exported out of Hong Kong. Before shipment, importers should enter into a written agreement with their trade partners to specify the quantity and quality of waste to be shipped, and include a contingency arrangement to return the recyclables to the place of export if the recyclables do not meet specifications or are found contaminated. Consideration may also be given to arranging an independent inspection at the place of export to verify that the recyclables are uncontaminated.

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