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Ref: 14/11/14/4/1

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Dear Mr Erdmann

APPROVAL OF THE INTEGRATED INDUSTRY WASTE TYRE MANAGEMENT PLAN (IIWTMP) SUBMITTED BY THE RECYCLING AND ECONOMIC DEVELOPMENT INITIATIVE OF SOUTH AFRICA

Reference is made to your IIWTMP, which was developed in terms of Part 3 and 4 of the Waste Tyre Regulations (No. 31901 of 2009) and the National Environmental Management: Waste Act (No. 59 of 2008), and which was resubmitted to the Department on 10 February 2012.

The plan was approved and gazetted for implementation on 23 July 2012. However, the approval of the plan was subsequently withdrawn. I have now re-evaluated the plan. The plan has been evaluated on the basis of the requirements stipulated in section 9(1) of the Regulations. This revised plan is hereby approved and will come into effect on the date of publication in the *Government Gazette* and will be valid for a period of 5 (five) years from the said publication date.

## 1 Merits of the REDISA IIWTMP

The REDISA IIWTMP responds well to the requirements of an IIWTMP as stated in section 9(1) of the Waste Tyre Regulations.

## 1.1 Integration of the Waste Hierarchy

1.1.1 The REDISA plan embraces the waste hierarchy principles and recognises the existing recycling options and limitations. Commitment is made to finding solutions to the limitations and thus the plan proposes dedicated research and development capacity to further investigate other technologies and refine the existing ones.

1.2 Integration of previously disadvantaged individuals

- 1.2.1 The plan has BEE and specifically majority black ownership as a core requirement. This is feasible given the strong supportive elements within the plan such as training, corporate social investment, and development allocations in support of the informal sector.
- 1.2.2 The plan specifically targets the informal sector, SMMEs, and endeavours to build and develop BBBEE initiatives, which is applauded.
- 1.2.3 Transportation is separated from the management of transfer sites to allow for the existing small transporters to operate at a suitable scale.

1.3 Job creation opportunities

1.3.1 REDISA proposes a high labour intensive model which will generate an estimated 10 000 new jobs. These jobs are meaningful sustainable jobs as there are opportunities for people to own businesses. The implementation of the plan is likely to make a positive impact regarding the poor people of this country and it will create a desirable legacy to be followed in dealing with other waste streams.

1.4 Independence of governance structure

1.4.1 The REDISA model is based on final decisions being made by the Board, which does not include any of the role players in the tyre sector. This Board will thus be independent of the tyre industry and hence transparency and objectivity will be increased. The Board will also ensure that the socio-economic imperatives as articulated by the government are carried out.

## 2 Conditions of approval are as follows:

## 2.1 Reporting

- 2.1.1 Reporting must be done on a monthly basis for the first year of implementation, quarterly in the second year of implementation and annually for the remaining three years.
- 2.1.2 I reserve the right to alter the above-mentioned reporting frequencies, based on performance.
- 2.1.3 Reporting must include the following:
  - 2.1.3.1 National aggregated numbers and tons of tyres put onto the market in a year.
  - 2.1.3.2 National aggregated figures of the number and tons of waste tyres collected monthly.
  - 2.1.3.3 National aggregated number and tons of tyres used for recycling (also expressed as a percentage of the total).
  - 2.1.3.4 National aggregated number and tons of tyres used for energy.
  - 2.1.3.5 New jobs created in the transport sector due to the implementation of the IIWTMP.
  - 2.1.3.6 New jobs created in the processing sector due to the implementation of the IIWTMP.
  - 2.1.3.7 Number of businesses established in a year.
  - 2.1.3.8 For 2.1.1.5, 2.1.1.6 and 2.1.1.7 above, please indicate the BBEEE status of the people employed or new business.
  - 2.1.3.9 Spend on research and development as well as training.
  - 2.1.3.10 Outcomes of the research and training mentioned above.
- 2.1.4 An annual audit report from an independent auditor commissioned at the expense of REDISA must be submitted to the Department.
- 2.1.5 This audit must be done with regard to, at least, the following;
  - 2.1.5.1 Compliance with the approved IIWTMP and the conditions of approval
  - 2.1.5.2 Compliance with waste legislation and the Tyre Regulations
  - 2.1.5.3 Management of legacy stockpiles and reduction of the carbon footprint of waste tyres
  - 2.1.5.4 Financial reports
  - 2.1.5.5 The extent of the independence of the REDISA Board