



CALL FOR NEW INDUSTRY WASTE MANAGEMENT PLANS

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Outline

- Introduction (What, Why & How)
- Section 28 Notice
- Issues raised during commenting period
- Conclusions
- Recommendations

Introduction

- What are IndWMPs?
 - IndWMP is a legislated measure that enables collective planning by industry to manage their products once they become waste and to collectively set targets for waste reduction, recycling and re-use
- Why are IndWMPs necessary?
 - Because the people deemed it necessary that industry is held responsible beyond point of sale for particular products that have toxic constituents or pose waste management challenges, particularly where voluntary waste measures have failed.
- How are we intending to implement IndWMPs?
 - Constitution > NEMA > NEMWA Section 28

Section 28 Notice

- Notice of intention to call for IndWMPs (24 July 2015)
- Which new IndWMPs have been prioritised?
 - E-waste
 - Lighting
 - Paper & Packaging

Major Issues raised during commenting period



- Definitions
 - Paper
 1. Eliminating “usually thin sheets” and “wrapping”
 2. Producer:
 - Who needs to prepare and submit the IndWMP? Is it only an individual or Category of persons? What about Brand owners/retailers inclusions?
 - 70% representivity of the sector: Is it based on volume or numbers of producers? Volume excl. new entrants

Major Issues raised during commenting period



- Registration number
 - Eliminate the need for a “new registration number”
 - PRO registration vs producer registration
 - Trading documents clarification

Major Issues raised during commenting period



- Preparation & submission of IndWMPs
 - 12 months too short
 - Who prepares? Who submits?... Who is industry?
 - Should PRO be given the responsibility?
 - Criteria for adjudication of IndWMPs
 - Relationship between Producer & PRO

Major Issues raised during commenting period



- Stakeholder participation
 - Confusion on registration of producers vs stakeholders
 - 30 days consultation period is short
- Target setting
 - Some stakeholder associations are anti-recycling target setting consequently would struggle to develop activities (i.e. developing the Plan)
- Costing of the IndWMP
 - Levy or waste mngt fee

Major Issues raised during commenting period



- Compliance to IndWMP
 - Expectation that PRO / producer to ensure that transporters, storage facilities, processors, etc. comply
- PDI integration
 - Views that its beyond IndWMP countering the transformation agenda
- Procurement approaches
 - Views that specified set criteria “interferes” with existing set business practices which some counter preferential procurement

Major Issues raised during commenting period



- Job creation
 - Some views that it is beyond IndWMP counter to the transformation agenda
- Offences
 - Some views on excl. criminalizing non-compliance to the IndWMP

Conclusions

- A need to clarify who prepares & submits the IndWMPs
 - Need clarifying provisions for PRO
 - Clarifying the need for registration
- Seek to understand transformation imperatives and embrace them within the waste value-chain

Recommendations

- s 9(2) of the Constitution and NEMA s2 principles do and must be considered in any action or decision-making
 - the Waste Act (both in the objects of the Act or the criteria for evaluation of IWMP) does make provision for transformation issues to be considered

Recommendations

- The person or persons charged with the responsibility of preparing & submitting the plan is key in ensuring transformation imperatives are realised