

GG41612	SATRUCO
(a) The advantages or disadvantages of each of the industry waste tyre management plans in advancing sound waste tyre management throughout aspects of the value chain (Design to post-consumer phase; all sources and types of waste tyres considered in the industry waste tyre management plan).	Promises of cradle-to-cradle recycling (not yet achieved anywhere in the world) and similar high-minded aims, but no specifics anywhere. It specifically says it will not manage OTR tyres, or maybe it will but at additional cost. Solids are ignored - clearly based on outdated regulations.
(b) Demonstrate the details of the upstream and downstream value chain, including the market demand and supply analysis.	The plan does not do this in any useful detail in the supply side: Multiple and contradictory estimates of waste tyres arising in 5.3, saying new tyre production is either 232,000 tons or 250,000 tons, and attrition is either 25% or 20%, with net waste tyre arising either 173,000 tons or 200,000 tons.  On the demand side, it fails completely. Existing processors list is outdated and contains errors (e.g. Langkloof Bricks is not a cement kiln). No numbers or forecasts of market demand.
(c) How each of the industry waste tyre management plans facilitates extended producer responsibility and waste minimisation for sound environmental management (substantiate or elaborate on the reasons).	The plan says it will collect most tyres and promises much in facilitating further processing but does not provide specifics that can be judged.
(d) How do the industry waste tyre management plans enable diversion of tyres from landfill to re-use and recycling? Provide detail of implementation measures that will ensure recycling rates increase, if any.	There is no detail of implementation measures that will ensure recycling rates increase.
(e) How do the industry waste tyre management plans enable a stable, predictable transition with current waste tyre participants, to ensure synchronisation with the existing infrastructure? How do they envisage the supply of waste tyres?	The plan is not specific and defers the problem to after it is approved: "On approval of the SATRUCO Plan a further detailed audit of the sector will be conducted and existing facilities will be invited to subscribe to this plan which will ensure a smooth transition from the previous plan" (emphasis added). There is no explanation of how the audit and invitations will ensure a smooth transition, it is simply stated as a non-sequitur.
(f) What are the elements or design incentives in the industry waste tyre management plan for participation and professionalising of the informal sector in waste tyre management?  How does the plan purport to promote small and medium enterprises?  Comment on the extent to which Black owned businesses will be empowered to participate meaningfully in the plan?	A commitment to train and licence micro-collectors to use Trikes and a commitment to train 1500 previously disadvantaged individuals per annum "to support the Waste Tyre Industry". No detail.  "will establish a preferential procurement policy for SMMEs", "encourage" JVs, and work with State Departments. They will provide training and seed grants (but it's not clear where this is budgeted for).
(g) Is the proposed infrastructure contemplated in the industry waste tyre management plan able to advance a defined standard of waste tyre management system (collection, pre- processing, re-use, co-processing, recycling, etc.)?	There is insufficient detail to comment meaningfully, nor is it clear what 'advance a defined standard of waste tyre management system' means.
(h) How does the plan identify and register new waste tyre transporters and waste tyre processors?	For micro-collectors, they rely on the DEA micro-collector database. There does not appear to be any reference to how other transporters will be identified and registered, nor any reference to identification and registration of new processors.
(i) Is the financial proposal/cost structure for implementation of the industry waste tyre management plan reasonable (elaborate on comments) and provides revenue generation projections? The plan must provide a detailed breakdown of costs and revenue projections. The plan must provide for a costed annual implementation plan with performance targets.	It is not possible to square the overall budget with the funds collected in tyre levies, although the plan repeatedly refers to the R2.30/kg tyre tax. The budget is extremely sketchy and gives the appearance of a top-down (assume the revenue and plan to spend it) rather than bottom up. The allocations do not make sense. For example, the amounts allocated to transport of tyres work out to about R115/ton, which is far too little. The figures for jobs created in Tyre Destruction Officers and micro-collectors cannot be funded from the % allocations set aside for them unless they work for very, very low wages, and even then that leaves nothing for equipment costs, maintenance, travel, etc.  There are no detailed breakdowns of costs, zero revenue projections (nor any explanation of why there will be no revenue).  All of the above is however made moot by the disclosure at the public hearings that budgets, jobs and scope of work (OTR) have all been changed from the published plan, and it is not possible to comment on the impact of the changes without context, which we have not been provided.
(j) Do the governance structures proposed in the industry waste tyre management plans enable clear identification of all parties involved in the industry waste tyre management plan, their respective roles and does it enable and promote transparency and accountability to the industry and government, as well as oversight to avoid any form of conflict of interest?	The intention to split the operational management of the plan on provincial boundaries is irrational. There is no logical reason to compartmentalise operations according to provincial boundaries. It will duplicate administrative functions, create inefficiencies and bureaucracy, and make accounting and auditing of money flows and contract processes in the provincial silos vastly more complex. It will render the operation ripe for corruption and financial mismanagement by hamstringing effective external oversight.

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(k) Does the plan ensure identification and participation of beneficiaries throughout its operations?	It is not convincing in this respect, relying too much on saying what it will do in future only in the broadest terms, and drawing on State departments, and particularly the DEA.
(l) Does the plan address social upliftment of the vulnerable communities they operate in?	Only in poorly-defined, general terms, and in some cases not credibly. For example, it states that depots and waste tyre collection and sorting points can "ensure a vibrant rural revitalisation programme". However, since waste tyres arise predominantly in urban areas, this would require massive additional transport of tyres to the rural areas then back to the industrial areas where they will be recycled.
(m) What is the level of current and future innovation (including engineering and technology) that is focused on meeting challenges in the efficient management of waste tyres and clean production	This is only addressed in the broadest terms, promises without substance.
(n) Are the targets proposed in the industry waste tyre management plans clear, defined, measurable and realistic (specific attention should be focussed on job creation - both formal and informal)?	Section 4.4 lists indicators but declines to attach any figures to them.  Job creation figures are a moving target, so it is impossible to comment on them (see point (i) above), but the figures in the published version are not realistic when measured against the budget, nor when measured against practical experience with the REDISA plan.  The collection targets in section 1.7 are based on estimated waste tyre volumes that include OTR, yet in 1.5.2 and also in 6.11 it indicates that they have not planned for OTR tyres.
(o) Will the plan ensure training and development towards the creation of new sustainable jobs?	The plan says it will, but does not provide convincing detail.
(p) Is there adequate provision in the industry waste tyre management plan for record-keeping, reporting, auditing and oversight of the implementation of the industry waste tyre management plan and are there sufficient controls to ensure proper accountability?	The description of the MIS system in 5.14 is embarrassing in its inadequacy and irrelevance. Listing details on trivial components such as the router used, and stating what programming languages were used tells us nothing about its fitness for purpose. And, as mentioned against point (j), the operational, administrative and accounting inefficiencies of splitting operations along provincial lines will render proper accountability nearly impossible to achieve.
(q) Assess the potential capability of the companies responsible for implementation of various aspects of the waste tyre value chain.	The only company for which we are given background is SATRUCO. The claims of readiness in section 1.3 are not supported by CVs of the skilled professionals fillign the roles referred to (they list seven 'teams' in different fields of expertise, implying a minimum of 14 people). The errors and inconsistencies in the plan do not generate confidence in the authors of the plan being able to implement it.
(r) Are there any general observations regarding best practice or possible areas of inadequacy/caution in respect of any of the industry waste tyre management plan?	None of the plans can be said to comply with GN1148. The SATRUCO plan does not provide detailed budget breakdowns (and is amending them on the fly), and in any event appears extremely expensive given that it explicitly excludes OTR - 10% by volume, but a larger share by cost of management.
(s) Comment on the feasibility of more than one plan or aspects of the plan operating simultaneously.	SATRUCO states it should be the only plan. Multiple plans do not make sense as they create needless and expensive duplication of effort and administration affecting all stakeholders negatively. The REDISA plan set out strong arguments for a single plan approach, and TWAMISA's arguments for segmentation in 7.3 of that plan are contradicted in their 7.4 where it lists good reasons for combining operations.
(t) How does the plan contribute to national awareness regarding waste tyre management?	Impossible to say. Section 5.11 disposes of the issue in just 10 lines, simply averring that they will figure something out and undertake a campaign that "will take the form of posters at tyre dealers, distribution of leaflets, radio discussions, and mass media advertising".
(u) Indicate to what extent will the plan considered the management of waste tyre stockpiles as per waste tyre regulations	Not very well, since, as they state in the Executive Summary the plan is a "response to regulation 6(3) of the Waste Tyre Regulations published in the government gazette no 31901 of February 2009". They continue to mention the subsequent 2016 and 2017 amendments, without noting that those amendments replaced (not supplemented) the WTR 2009. This is repeated in 1.2, but thereafter the plan is still firmly based on the 2009 regulations. Clearly they have not thoroughly revised and updated the plan to conform to current legislation, all they have done is insert references to the amendments in the introductory section.

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<p>(v) overall assessment of compliance with the requirements for an industry waste tyre management plan as indicated in paragraph 4 of the Government Notice No. 1148, Gazette No. 41213 of 30 October 2017.</p>	<p>Very poor. With reference to item 4 in GN1148:</p> <p>(a) Their parties to the plan are almost exclusively the tyre and motor industry, who by their own admission in Section 4.3 are organisations acting "in the best interest" of their members.</p> <p>(b) Complies.</p> <p>(c) Only global figures, no breakdown by type, and multiple contradictory estimates.</p> <p>(d) Dealt with scantily, no substance.</p> <p>(e) General statements and promises.</p> <p>(f) Non-compliant.</p> <p>(g) Insufficient detail.</p> <p>(h) Complies.</p> <p>(i) Non-compliant.</p> <p>(j) Merely lists current depots, no specifics on further development.</p> <p>(k) Complies to a degree.</p> <p>(l) Superficial, incomplete description.</p> <p>(m) Non-compliant: OTR and solid tyres are not included.</p>
<p>(v) (continued)</p>	<p>(n) Non-compliant. Budget amounts to a commitment to spend all the money collected through the tyre levy. Allocations to functional areas are not obscure and in areas clearly infeasible in relation to jobs forecast or transport costs.</p> <p>(o) No evidence of complying to NPS other than acquiescence to accepting funding from the DEA and planning to spend all the available funding, plus requiring additional funding.</p> <p>(p) A single table showing collection targets growing from 40% to 100% in 5 years. No other information.</p> <p>(q) Non-compliant.</p> <p>(r) Very inadequate - see comments against (t) of GG41612, above.</p> <p>(s) Sketchy, full of promises, light on detail.</p> <p>(t) Complies, but the feasibility and funding are doubtful. No detailed plans or costing.</p> <p>(u) Very ambitious and not possible in the budgets allocated.</p> <p>(v) Complies.</p> <p>(w) Cursory: primarily just a listing of applicable legislation.</p> <p>(x) Cursory and incomplete.</p> <p>(y) Only global annual figures provided, with operational costs declining by 25% even as jobs (funded by the plan) grow by 371% and collections grow by 150%. Such a progression demands proper explication.</p> <p>(z) Complies.</p>
<p>(w) Comment as to whether there was sufficient consultation before the final drafts of the plans were submitted to the Minister as stipulated in section 5 of the Section 28 notice, and whether the comments and objections from the consultation process were sufficiently considered in the preparation of the final drafts.</p>	<p>No <u>evidence</u> of consultation or of the required advertisements has been provided, and the claims of consultations have been contested in the public hearings. Their own plan identifies affected parties as the tyre and motor industry bodies (all intent on <u>their</u> "best interests"), plus the NRCS, no-one else</p>