

Matrix of Comments Submitted by South African Tyre Manufacturers Conference
7th June 2016



Consultation on the Proposed Industry Tyre Waste Management Plans, as published by the Minister of Environmental Affairs in the Government Gazette (No. 41612) on 7 May 2016 in accordance with National Environmental Management: Waste Act 2008 (Act No. 89 of 2008) under Section 32(5A), read with Section 72 and 73

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EVALUATION CATEGORY	ASSESSMENT CRITERIA	PLAN SUBMITTER				
		SATMTC Position	Evergreen Energy (Pty) Ltd	JPC Energy Systems	South African Tyre Reuse Company (SATRUCCO)	Tyre Waste Abatement and Minimisation Initiative of South Africa (TWAMISA)
Comment on the feasibility of more than one plan or aspects of the plan operating simultaneously		The SATMTC is of the view that there should be one single supplier for the execution of an industry waste tyre management services for pneumatic passenger tyres as well as Off-The-Road. Therefore ideally, there should be one overarching plan, which caters for all specifications of tyres as provided for in the Rates and Monetary Amounts and Amendment of Revenue Laws Act 2017. If more than one or multiple industry waste tyre management plans are considered for and approved as it meets the requirements set out in the Government Gazette No. 41612, the roles, functions of and services rendered by these plans must be clearly defined including the rationale and benefits of adopting such an approach to waste tyre management. The SATMTC recommends that one plan for all specifications of tyres is developed in consultation with the tyre manufacturing industry. Moreover, at this stage the current plan of environmental levy on tyres cannot fund 2 separate plans to fulfil the EPR obligation of one industry.	Evergreen has concurred during the DEA Provincial Public Hearings, that they do not seek to address the entirety of tyre waste management and that their "Plan" was not intended as a "Plan" or submitted as such. Nor is it their intention to manage the entire tyre waste stream. Their focus is on recycling and abatement of tyres. Therefore, they will seek to work with other Plan submitters who may be appointed, in order to fulfil once aspect of a processing method for tyres.	The JPC proposal does not constitute an Integrated Waste Management Plan and is rather a Business Plan for a pyrolysis processing plants.	The proposed SATRUCCO Plan is not a comprehensive Plan and does not address the entirety of waste management for ELT. Of particular concern is the significant emphasis by SATRUCCO to play a regulatory, enforcement and compliance management role over certain aspects of the value chain for ELT waste management. This resembles an approach to aspects of activities previously undertaken by REDISA and which did not form part of the REDISA approved plan. This problematic and of concern to the tyre manufacturing industry and should be for Government as well. The SATRUCCO Plan places a greater emphasis on socio-economic development opportunities through the Plan and is less detailed on its operationalisation of tyre waste management activities throughout the value chain.	The TWAMISA Plan proposed to ring-fence OTR tyres within the overall operations of tyre manufacturers and subject to waste management. A standalone plan dedicated to OTR tyres is not feasible and does not cater or contribute to an integrated and coordinated approach to the management of all waste tyres in South Africa. This does not serve the EPR interests and obligations of the tyre manufacturing industry. TWAMISA has not adequately or sufficiently substantiated the need for a specialised and standalone OTR tyre waste management plan and the advantages it seeks to provide. The proposal envisions recycling OTR tyres into tyre, shred and crumb, including other recycling methods, are yet to be developed and researched by TWAMISA.
	The advantages or disadvantages of each of the industry waste tyre management plans, including sound waste tyre management throughout aspects of the value chain (Design to post-consumer phase; all sources and types of waste tyre considered in the industry waste tyre management plan).	The SATMTC is of the view that all Plans do not meet the core requirement and function in terms of undertaking, implementing and administering effective waste tyre management of End-of-Life Tyres from the cradle-to-grave. Moreover, the Plans have omitted the primary purpose and intent of Industry Tyre Waste Management Plans, which is to provide waste tyre management. Therefore, all plans must firstly focus on processing waste tyres and have the capacity to address waste tyre management across the country - in all provinces. Moreover, the plans put forward should represent the best value for money and provide the most cost-effective services throughout the cycle of a waste tyre cycle. SATMTC is of the view that all plans should be ultimately driven by contributing to the abatement of waste tyres.	The Evergreen "Plan" by its own admission does not comprehensively address tyre waste management or the abatement thereof as it does not include the entire value chain for End of Life Tyres (ELT), but only focused on the by-product of processing waste tyres. It has a centralised approach focusing on one model for establishing and operationalising a pyrolysis plant, which may be replicated by others in different provinces, which is not dependent on Evergreen itself.	The JPC proposal does not comprehensively address as it does not include the entire value chain for ELT, but only focuses on the process of waste tyres through waste to energy conversion.	The proposed SATRUCCO Plan rests heavily on an envisaged pre-processing operation for the generation of a Tyre Derived Fuel (TDF) commodity from 34 tyre chipping operations. While this may contribute to converting existing stockpiles, by future of the scale envisaged in the SATRUCCO plan will depend on future storage facilities and property for the pre-processed commodity. It is unclear from the detail in the proposed plan, how these facilities will be acquired, considering that SATRUCCO's own admission existing storage facilities and deposits in the country do not adhere to regulations. This proposition presents uncertainty and does not contribute to the tyre manufacturing industry's execution of its EPR obligations.	The TWAMISA Plan fails to articulate what constitutes processing activities for OTR tyres and what the processing activities would be for an OTR specific waste tyre management plan. Furthermore, the plan has not defined recycling in terms of the tyre specification it seeks to provide. The proposal envisions recycling OTR tyres into tyre, shred and crumb, including other recycling methods, are yet to be developed and researched by TWAMISA.
	How each of the industry waste tyre management plans facilitate extended producer responsibility and waste minimisation for sound environmental management (substantiate or elaborate on the reasons).	SATMTC is of the view that there are certain aspects and features of each plan submitted that can be used to undertake the recycling of waste tyres. However, the current proposed processing methods put forward in these plans (chipped rubber or burning tyres into energy for power stations) only present interim streams not permanent or sustainable measures. The plans also lack the relevant details for dealing with waste tyre stockpiles through to the rest of life cycle of waste tyres. The Waste Management Bureau can collect and stockpile waste tyres but does not adequately address processing requirements such as using power stations with combustion cycles. Therefore the SATMTC proposes that an interim and future strategy must be developed and adopted for industry waste tyre management. As the tyre manufacturers, the SATMTC recommends the adoption of the cradle-to-grave principle and circular economy approach to sustainable waste tyre management which supports waste tyre abatement. Moreover, the SATMTC is of the view that the amount of recycling at disposal is only 1-2% of the total input amount in respect of by-products such as carbon black and ink. The SATMTC submits that all plans should focus on limiting waste tyres. In this regard, the SATMTC's view of what successful waste tyre management looks like for the tyre manufacturing industry consists of the following aspects: environmentally friendly minimisation of waste tyre to landfill; less stockpiling of waste tyres; cradle-to-grave approach to processing. All plans do not document different forms of reuse and recycling. Moreover, the SATMTC asserts that a waste tyre must not be reused or reconstituted into a tyre for use of any vehicle. Therefore all plans must put measures in place to ensure that part worn tyres that are unsafe do not re-circulate in the market. This however also requires the effective regulation of second-hand tyres to stop leakages and re-entry into the market. However, it should be noted that the tyre manufacturers do not want to pay to fully abatement activities which should be undertaken by DEA. Therefore any industry waste tyre management plan should not include compliance and enforcement activities as this is a state function.	The Evergreen "Plan" only accounts for one aspect of tyre waste management, which is only a partial and limited fulfilment of the tyre industry's EPR obligations. While it may seek to minimise and eradicate waste tyres, it does not document how the operations will be capitalised to support tyre waste management at the current level of production, via one processing method i.e. pyrolysis. Evergreen proposes 100% waste tyre recycling through the process of pyrolysis, which is one strategy to reduce the accumulation and build-up of waste tyre stock piles. Evergreen's long-term strategy, does not focus on tyre waste management, but rather seeks to expand its pyrolysis operations to cater for other priority waste streams e.g. plastic. This represents more a go-to-market strategy approach for pyrolysis business development and expansion, as opposed to a comprehensive and holistic solution for tyre waste management.	The JPC proposal does not seek to facilitate or undertake the EPR obligations of the tyre manufacturing industry. It is largely heavily established joint ventures and Public Private Partnerships (PPPs) with Government to unlock the associated socio-economic outcomes envisaged by the Department of Environmental Affairs. It is not primarily focused on the comprehensive management waste tyres and driving socio-economic benefits flowing therefrom. It starts with a focus on the end, without systematically addressing the challenge of tyre waste management in South Africa.	The SATRUCCO Plan propagates a "Cradle to Cradle" approach to the recycling of tyre waste management. However this seems to be premised on a single pre-processing chipping operation. This represents a high rate of dependency on a single processing activity with too many variables, including the export market price for the Tyre Derived Fuel (TDF) commodity and lack of certainty over regulatory compliance storage facilities for pre-processing stockpiles. Moreover, the tyre manufacturing industry does not support the cradle to cradle concept for waste tyre management in South Africa. Waste tyre management must be based on cradle to cradle to give approach in the interest of consumer safety.	TWAMISA's Plan does not fulfil the EPR obligations of the tyre manufacturers. All tyre manufacturers produce pneumatic passenger tyres, but not all manufacturer OTR tyres. TWAMISA has failed to demonstrate how its plan will contribute to waste tyre minimisation and recycling. Moreover, the plan does not specify how it effectively outsources the tyre manufacturers EPR obligation to a third party. Therefore, a Plan that does not comprehensively deal with all tyre specifications, does not advance or facilitate the tyre manufacturers EPR obligation.
	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.	The SATMTC is of the view that all plans should focus on recycling as its primary activity and nothing else. This should include focus on the logistics (collection, transportation and storage) aspect as well as provide detailed outlines on the proposed processing methods to be undertaken for effective waste tyre management. It is our view that all plans lack the relevant details regarding processing of waste tyres. The SATMTC contends that the integrity of process of adjudication and Ministerial approval of the Plan as well as the appointment of the entity implementing and administering the plan must be upheld and approved by the DEA. This specification to the implementation and administering of the plan to ensure that the waste tyre management system is not subject to fiscal leakages and misappropriation of collected funds.	The Evergreen "Plan" admittedly does not address various diversion methods from landfill for reuse and recycling. It is focused on the process of pyrolysis to produce by-products and secure off-take markets for these. Therefore, it does not adequately detail measures which will be undertaken to increase recycling rates or look at other types of processing methods. It is essentially a plan that is focused primarily on securing and maintaining the commercial opportunities arising from a narrow and limited focus on the by-product for targeted off-take markets derived from pyrolysis. It lacks detail on a comprehensive and holistic approach to diversion of waste tyres from landfill through multiple reuse and recycling measures and methods.	The JPC proposals puts forward the concept of establishing two processing plants. However, only one plant will be used to convert waste tyres, but also municipal solid waste into carbon char, fuel oil and other products that can be used to generate electricity or heat.	The proposed SATRUCCO Plan does not comprehensively address the recycling of tyre waste management. It is highly reliant and dependent on a single pre-processing activity (i.e. chipping) to produce a by-product commodity (Tyre Derived Fuel). Therefore, the only diversion method provided is the recycling to pre-processing plants for chipping. Furthermore, it lacks detailed waste diversion methods.	The TWAMISA Plan primarily seeks to service mining companies and historic stockpiles. The production of OTR tyres and the processing methods available for the recycling of such tyres, is limited at best. While TWAMISA may facilitate a diversion of waste and stockpiles, it does not comprehensively address reuse and recycling methods. Therefore, the ability for TWAMISA Plan to contribute to increased rates of recycling, is significantly diminished by virtue of the OTR specialisation.
Are there any general observations regarding best practice or possible areas of inadequacy/inconsistency in respect of any of the industry waste tyre management plans?	The SATMTC submits that the plans submitted do not demonstrate best practice for waste tyre management and we also argue that these plans are dealt with on a bad precedence due to REDISA. The SATMTC proposes that there should only be one industry Waste Tyre Management Plan as well as the appointment of a single entity to implement and administer the approved plan. The SATMTC puts forward the following guidelines and best practice in respect of waste tyre management: The entity appointed to implement a plan must be a business model and financial plan to support the implementation of the plan. Moreover, as a matter of principle, the entity should be appointed by virtue of the plan they have submitted must be the direct implementer of the plan, not the service provider. Oversight and monitoring the implementation of the plan is critical and any plan should not impose restrictions in this regard. The legal structure implementing and administering the Plan must not present an opaque structure, which inherently lends itself to lapses in governance, accountability and transparency. The SATMTC is of the view that the plan submitted is the intellectual Property of the submitter, there is no provision within the prevailing legislation or law that obliges the DEA to appoint the person who designs the plan to also implement the plan. In this regard, the DEA may purchase a plan and then procure services to execute such a plan. The SATMTC is of the view that a 5-year tenure for industry Waste Tyre Management Plans are unrealistic and impractical. The DEA should consider a 10-year investment horizon for waste tyre management. A 5-year tenure is insufficient because all submitted plans only project an upturn in activities in the 4th or 5th year of implementation. The SATMTC proposes that there may be staggered contractual periods with the option of renewing after the 5th year upon a review of the performance of the plan. If the plan is renewed then the activities should be undertaken and offered at a reduced cost for the execution of the plan, which may be revised and amended. In this regard, it is the contention of the SATMTC that industry Waste Tyre Management Plans must provide a broad outline for waste tyre management that can evolve on the basis of the evolution of tyre manufacturing industry, circular economy and market. The SATMTC proposes that a waste tyre management plan is acquired by the Waste Management Bureau upon which the WMB puts out a tender for services and may also review plans in consultation with the tyre manufacturing industry on an annual basis.	Resolving the waste tyre problem in South Africa is the identified objective and while pyrolysis may result in recycling 100% of the solid waste into valuable products as commercially viable commodities in the market place, at this stage in South Africa's trajectory towards a circular economy, pyrolysis is only once aspect of the solution needed. In addition, pyrolysis as demonstrated in the Evergreen "Plan" requires significant capital investment which cannot be subsidised solely by the reallocation of the Waste Tyre Levy. Moreover, pyrolysis is only one of many available methods for recycling and processing waste tyres. The Evergreen "Plan" is altogether silent on these other methods.	The JPC proposal regarding the use of waste tyres is based on outdated data regarding the volume of waste tyres generated in South Africa on an annual basis. The JPC proposals seeks to capitalise on existing waste tyre recycling streams to offer waste rubber and plastic conversion to fuel plants. It therefore does not take into account the tyre waste stream as a priority waste stream and the replicable hierarchy in execution of the tyre manufacturing industry's EPR obligations. Furthermore, it requires upfront funding, capital and investment prior to undertaking any meaningful waste tyre recycling activities. It is therefore unable to implement the basis of its proposals within 60 days of the date of publication to be approved by the Department of Environmental Affairs.	While the SATRUCCO Plan is strong in subscribing to recycling principles for good practice in waste management, it is weak on the operational detail for how this will be achieved.	The TWAMISA Plan significantly supplements the proposed waste management initiatives, including comprehensive measures to private sector to participate in the Plan's programme. The private sector (the tyre manufacturing industry) benefits are confined to the execution of the plan activities to implement its EPR waste management obligations. Therefore, there is in principle no incentive to invest beyond the prevailing legislation. The focus of this plan should be on tyre waste management, not other initiatives which do not support and enhance the implementation, effectiveness and administration of the plan.	
Demonstrate the details of the upstream and downstream value chain, including the market demand and supply analysis.	SATMTC is of the view that 4 Industry Waste Tyre Management Plans submitted have not demonstrated a sufficient knowledge of the upstream and downstream value chain for waste tyres. These plans have also not provided a market demand and supply analysis in support of their preferred waste tyre management activities including the by-products of pre-processing and processing methods.	Evergreen outlines the pyrolysis process and the prospective by-products which they may be able to generate from waste tyres. This includes, demonstrating at a high level the potential off-take markets for crude oil and diesel. The focus is therefore on the creation of upstream by-product markets to supply and users with a finished by-products, and no downstream value creation beyond this. Evergreen has not adequately identified their market segment or off-take markets and these require the generation of products beyond a set-up and start-up phase.	JPC proposes the establishment of two processing plants which are not dedicated waste tyre management or processing facilities and the prospective by-products to generate from waste tyres. JPC does not specifically identify the potential off-take markets, but is rather reliant on Government collaboration, dependency and PPPs to drive and develop the market for such by-products. The focus is therefore on the creation of upstream by-product markets to supply end users with a finished by-products, and no downstream value creation beyond this. JPC envisions the replication of the two types of processing plants across the provinces that will generate possible job creation opportunities, including the development small and medium enterprises and the incubation of start-ups and entrepreneurs.	The proposed in the SATRUCCO Plan for the pre-processing of waste tyre through chipping operations to generate a Tyre Derived Fuel (TDF) commodity, is the only downstream proposal contained in the Plan. It is premised on securing the off-take agreements to whom this commodity can be sold at the right price point to ensure the continued viability of the processing method. It is also aimed at creating downstream opportunities for further waste processing provided there is an opportunity for a participants in the waste stream to secure an off-take market.	TWAMISA is a heavily reliant on mining companies to provide the supply, demand and off-take markets for OTR tyres. TWAMISA has assured that the market would naturally sustain OTR recycling. TWAMISA failed to provide a detailed market demand and supply analysis, in support of funding requirements based on its waste management activities as contained in the Plan.	
Indicate to what extent the plan considers the management of waste tyre stockpiles per waste tyre regulations.	The plans published do not extensively or adequately address the full life cycle of a tyre. Moreover, the plans do not set out the methodology for waste tyre management and exploit cost thereof including the manner in which waste tyre stockpiles will be dealt with. The SATMTC submits that all plan submitters must furnish the Department of Environmental Affairs (DEA) with a business model for its operations as well as the financial model for the implementation of the such a plan. The plans published do not detail or provide a forecast of financial modelling and waste tyre processing including the available streams for recycling. Furthermore, at present the SATMTC does not have any confidence that the Plans submitted understand the end-to-end process for waste tyre management including the feasibility thereof on the basis of the features of the plans submitted including processing methods. The SATMTC submits that there is an interim solution required for addressing stockpiles and surmountable while developing a more comprehensive solution for dealing with stockpiles and undertake effective waste tyre management.	Evergreen does not address the issue of legacy waste tyre stockpiles, whether these are accumulated REDISA legacy stockpiles and those stockpiles accumulated in the transition between the termination of REDISA's mandate and the take-over of REDISA's activities by the Waste Bureau.	JPC has not clearly outlined how they seek to address the issue of legacy waste tyre stockpiles, whether these are accumulated REDISA legacy stockpiles and those stockpiles accumulated in the transition between the termination of REDISA's mandate and the take-over of REDISA's activities by the Waste Bureau.	The proposals contained in the SATRUCCO Plan do not provide adequate details of how the requisite regulatory compliant storage and property facilities for accommodating pre-processing stockpiles will be guaranteed. By its own admission, SATRUCCO acknowledges that current deposits available in South Africa do not adhere to regulations. SATRUCCO also proposes to complete a register of stockpiles of waste tyres in each province. SATRUCCO proposes to deal with all waste tyre stockpiles through once pre-processing waste method. However, the volume and the rate to be dependent on the capacity and specification of the machines require to chip. Therefore, the ability of SATRUCCO to process all stockpiles is dependent on the capital to fund the purchasing or leasing of a large amount of these machines to service multiple pre-processing deposits.	The TWAMISA Plan places a skewed emphasis on OTR tyre stockpiles both historical and REDISA legacy stockpiles. Stockpiles are largely dealt with separately via abatement plans. Therefore, there is insufficient focus to exclusively service and address these types of stockpiles. Moreover, the focus on OTR tyres means that TWAMISA excludes a large percentage of the participants in the current waste tyre management activities as these are largely focused on pneumatic passenger tyres and are therefore expected to be processed to service these.	
Assess the potential capability of the companies responsible for implementation of various aspects of the waste tyre value chain.	It is the SATMTC's view that all plan submitters lack the appropriate and fundamental knowledge regarding the tyre manufacturing industry cycle. Moreover, they do not demonstrate the relevant skills, knowledge and expertise to implement, execute and administer aspects inherent in the waste tyre value chain.	Evergreen's focus is only the Mpumalanga Province, whereas tyre waste management is a national problem and priority, requiring a national as well as harmonised provincial approach. Evergreen has no footprint beyond the Mpumalanga Province and does not propose to expand beyond the Mpumalanga Province. Therefore, tyre waste management throughout the country will not be accommodated unless these are transported to the proposed plant at the expense of tyre manufacturers. Evergreen does not take responsibility for collection, transportation or storage, beyond that which is housed in their envisaged plant yet to be constructed (and land acquired for) in Mpumalanga Province. These additional costs to be borne by tyre manufacturers defies the logic of the Waste Tyre Levy, from which these costs should be funded in the implementation of any approved plan. The Evergreen "Plan" has a narrow technical focus on the process of pyrolysis without consideration for the entire waste tyre value chain, including supply, collection, transportation and storage of waste tyres. Evergreen has not demonstrated any experience in ELT recycling nor capacity or capability and training as their entire plan is dependent on receiving grant and investment funding to setup the envisaged plant to implement pyrolysis processing. Evergreen has not specifically referenced how they intend to provide collection and recycling for all types of tyres as catered for in Schedule 1 of the Rates and Monetary Amounts and Amendment of Revenue Laws Act (2017).	JPC has accommodated the need for provincial operations across the country as envisaged for the two types of processing plants in its proposed plan. This includes tyre waste collectors, tyre waste couriers, tyre waste depots, and it is important to note that these are not dedicated waste tyre facilities, but will be geared to collect other types of solid municipal waste. These facilities are however yet to be established and capitalised in order to exercise the respective duties within the waste management system.	SATRUCCO has a large management structure, with only one COO responsible for overseeing the implementation of all of the technical, logistical and operational components of the plan. SATRUCCO lacks the human capital and expertise to successfully monitor the performance of the plan and ensure that the waste tyre management activities undertaken do not deviate.	TWAMISA only caters for a segment of the waste tyre value chain responsible to OTR tyres. TWAMISA has not sufficiently demonstrated that the TWAMISA operations will be largely dedicated to services of specific processing methods applicable to these tyre specifications. TWAMISA will not be the only service provider offering to dispose OTR tyres and stockpiles at mines include the fact that the production and importation levels for OTR tyres are significantly less than pneumatic passenger tyres. This means that the rate of supply is subject to these factors. Moreover, TWAMISA would need to ensure that its service providers (i.e. collectors, transporters and depots) possess the necessary specialised equipment to deal with the OTR specifications.	
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?	The SATMTC is of the view that all plans submitted should factor in the usage of existing infrastructure and equipment. Therefore these should not start off a zero basis and require resource and funding to develop infrastructure from scratch. Accordingly the timelines for effective implementation of a new plan including the applicable transitional period will be significantly reduced by using existing infrastructure.	Evergreen has not demonstrated how they intend to make use of existing infrastructure in support of executing a waste tyre management system for the tyre industry. It has not demonstrated how it will take into account the existing infrastructure and does not cater for the requirement with existing structures undertaken by the Waste Management Bureau.	JPC currently does not have any existing assets, infrastructure or operations to indicate that they will be in a position to transition with the current waste tyre participants, as they require all service providers to be registered with current waste tyre participants. Moreover, they do not provide clarity in respect of how waste participants will be compensated. This is said to be defined in liaison with the Waste Management Bureau. The operational proposal put forward by JPC does not clearly indicate how they will ensure a synchronous with the existing infrastructure deployed by the Waste Management Bureau used to provide the current waste management services.	SATRUCCO proposes to conduct an audit of the sector and existing facilities, in order to invite these to subscribe to the SATRUCCO plan to facilitate a seamless transition from the previous plan. It is unclear as to the timelines for undertaking the audit and whether this will be conducted during or prior to the transitional period applicable if their plan is approved.	TWAMISA proposes the establishment of specialised OTR depots and processing sites. Accordingly, even after handover of the Waste Management Bureau activities effective implementation of the TWAMISA, it cannot be executed as TWAMISA suggest that they cannot make use of existing OTR facilities and other depots, including those currently being utilised by the Waste Management Bureau. This means that the transitional period, is unlikely to be met by TWAMISA in operationalising its plan.	
How do they envisage the supply of waste tyres?	The SATMTC submits that the industry waste tyre management plans published do not demonstrate an understanding of the supply of waste tyre value chain and the logistical requirements for supply of waste tyres to meet the proposed processing activities. The collection transportation and storage of waste tyres requires a logistics plan and strategy to ensure that each area is being serviced and that the aforementioned services may reach identified depots in order for pre-processing or processing activities to take place.	Evergreen does not provide a clear outline for the supply of waste tyres. The assumption is, that they will receive sufficient volume of tyres to generate the desired by-products, even though they have not accounted for collection services.	In their proposal, JPC has included tyre/waste collectors and tyre/waste couriers to service provincial processing plants. However, JPC does not specifically state the types of waste tyres they will seek to collect for processing, including how these tyres will be identified for collection and where these tyres will be collected from - for e.g. tyre dealers.	SATRUCCO proposes to harvest waste tyres from landfill and other sites/areas by micro collectors. SATRUCCO plan is heavily reliant on the tyre dealer network for the supply and collection of waste tyres.	TWAMISA proposes to create an OTR waste tyre management ecosystem around the operations of large mines. This means that the TWAMISA operations will be largely dedicated to services those companies and areas in order to ensure security of supply. Due to the fact that TWAMISA will not be the only service provider offering to dispose OTR tyres and stockpiles at mines include the fact that the production and importation levels for OTR tyres are significantly less than pneumatic passenger tyres. This means that the rate of supply is subject to these factors. Moreover, TWAMISA would need to ensure that its service providers (i.e. collectors, transporters and depots) possess the necessary specialised equipment to deal with the OTR specifications.	
What are the elements or design incentives in the industry waste tyre management plan for participation and professionalisation of the informal sector in waste tyre management?	The plans submitted do not sufficiently outline incentive schemes or measures for professionalising the informal sector in waste tyre management. Plans largely focus on creating revenue and short-term employment opportunities in the waste tyre management system and value chain. These are packaged as corporate social responsibility and social upliftment rather than contributing to professionalising service providers for long-term benefits and sustainability.	Evergreen does not consider incentivising participation and professionalising the informal sector as it is only focused on one processing method and intentionally does not comprehensively address the entire waste tyre management system.	JPC does not propose specific incentives for participation and professionalising the informal sector in waste tyre management. The informal sector will be incentivised and compensated for delivery of waste tyres. JPC will formalise collectors for registration, tracking and monitoring services. They have however proposed an outline for prospective job creation. Each plant location will generate associated job creation opportunities. The requirement is that all service providers must be registered with the plants they seek to service.	SATRUCCO envisages that the majority of employees will be drawn from micro collectors, consortia and cooperatives. They have proposed the formalisation of consortia and cooperatives as a key activity within the ambit of the plan.	The ability of TWAMISA to support the participation and professionalisation of the informal sector in waste tyre management is significantly constrained due to the fact that the informal sector is largely dependent on the collection, and transportation of pneumatic light passenger. Formalising this sector would require TWAMISA to provide capital equipment and training, in order for these participants to be considered within the waste management system.	
How does the plan identify and register new waste tyre transporters and waste tyre processors?	The SATMTC submits that Plan submitters have not considered the measures to be undertaken to identify and register new waste tyre transporters and waste tyre processors. Moreover, the plans submitted propose a centralisation and centralisation of processing activities, which means that this would inevitably exclude new entrants. Furthermore, current participants in the execution of waste tyre management by the Waste Management Bureau will be subject to further due diligence and eligibility tests before they can be considered for inclusion in the new Ministerial approved industry waste tyre management plan.	Evergreen seeks to provide a type of waste tyre processing via the establishment of their pyrolysis plant in Mpumalanga. Therefore it does identify or intend to register additional waste tyre processors. Evergreen plans do not constitute a waste tyre management plan and does not cater for the requirement of waste tyre transporters despite the fact that the envisaged plant will require a supply of waste tyres to be transported from various locations.	JPC has proposed to recruit service providers across the waste tyre value chain to service provincial Provincial processing plants. This is limited to tyre/waste collectors, couriers and depots. It does not include waste tyre processors as this is undertaken by the JPC processing plants.	SATRUCCO will use the Waste Tyre Micro Collectors Database at the DEA to identify waste tyre transporters in the 9 Provinces. They will also create a new category of transporters known as Trike drivers who will be trained and registered to transport small 1-ton loads of tyres over small distances. While they have accommodated waste transporters, the extent to which they will accommodate tyre processors outside of their pre-processing depots and plants is unclear.	TWAMISA will advertise and put out calls for OTR specific waste tyre transporters and tyre processors. However, TWAMISA itself does not have the skills, expertise or know-how required to identify the most suitable service providers in this regard. TWAMISA has argued that it cannot use depots at mines to store waste tyres (waste tyre transporters and waste tyre processors) as they require specialised providers for OTR tyres. TWAMISA will however undertake its own due diligence process in identifying and registering OTR participants.	
Does the plan ensure identification and participation of beneficiaries throughout its operations?	The SATMTC submits that while plans may include an outline for prospective beneficiaries of waste tyre management activities it does not provide sufficient detail in respect of the manner in which these identified groups may benefit on a sustainable basis.	Evergreen plans do not constitute a waste tyre management plan. It does not identify specific participants or beneficiaries in the implementation and operationalisation of the project. The primary beneficiaries are the potential end-users of the by-products with purchasing power to enable the financial sustainability and profitability of the project.	JPC does not identify specific participants or beneficiaries in the implementation and operationalisation of the project. The primary beneficiaries are the potential end-users of the by-products with purchasing power to enable the financial sustainability and profitability of the project. JPC further proposes ownership transfer with local communities having a 100% shareholding, facilitating training and skills transfer to local unemployed and returning skills/training skilled employees from previously disadvantaged societies.	SATRUCCO plan identified participating beneficiaries through the value chain. This includes landfill waste pickers, waste collectors/transfer station processors, transporters, SMEs, cooperative and community based PO groups.	TWAMISA outlines categories of persons who may benefit from participating in the OTR tyre waste value chain. This is however constrained due to the fact that TWAMISA is only an OTR and most of its beneficiaries are as a result of its proposed CSI initiatives.	

EVALUATION CATEGORY	ASSESSMENT CRITERIA	SATMC Position	PLAN SUBMITTER			
			Evergreen Energy (Pty) Ltd	JPC Energy Systems	South African Tyre Reuse Company (SATRUCCO)	Tyre Waste Abatement and Minimisation Initiative of South Africa (TWAMISA)
Advancing Waste Tyre Management	Is the proposed infrastructure contemplated in the industry waste management plan able to advance a defined standard of waste tyre management system (collection, pre-processing, re-use, co-processing, recycling, etc.)?	The SATMC supports an interim solution for effective waste tyre management, which SATMC working together with the DEA and Waste Management Bureau may develop in order to contribute to enhanced and improved levels of waste tyre management. In this regard, the SATMC commits to assisting DEA by providing the tyre industry's SATRP Plan for information purposes, which may inform the formulation of improved waste tyre management systems.	The Evergreen "Plan" only explains the pyrolysis process and does not account for a defined ELT management system. It furthermore assumes that all waste tyres may be viable and subject to pyrolysis processing. The proposal for establishing one pyrolysis plant in the Mpumalanga Province, cannot conceivably house all waste tyres, in addition to the absence of collection and depot facilities.	JPC proposed 2 types of processing plants to support waste tyres. However, this is not confined to waste tyres. Both types of plants need to be established, equipped, skilled and capacitated in order to undertake processing activities.	SATRUCCO's waste tyre pre-processing and processing do not advance a standard for a waste tyre management. The equipment required for pre-processing (chipping) has a lifespan of only 5 years.	TWAMISA has argued that it cannot use existing infrastructure to process the implementation of its OTR plan. Moreover, due to the fact the TWAMISA Plan only caters for OTR tyre waste management, this Plan is unable to advance a defined standard for an optimal waste tyre management ecosystem.
	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?	All plans published do not exhibit best practice in respect of effective waste tyre management nor do these demonstrate any consideration of global benchmarks.	While pyrolysis processing plants are a deficiency in South Africa, our circular economy has not yet advanced to the stage where we can become 100% reliant on pyrolysis technology to address waste tyre management. Evergreen is focused on generating by-products and dealing with tyre abatement to contribute to cleaner production. At this stage it provides an insufficient basis to justify investment in innovation of this nature, in the absence of other recycling and processing methods.	JPC is focused on generating marketable and viable by-products utilising environmentally friendly recycling and manufacturing methods. It is not focused on waste tyres only but contributes to innovation in waste tyre management by processing methods which generate a range of products.	SATRUCCO's plan is not introducing any new form of innovation in tyre waste management. A simple processing model for block chipping is proposed and there is not clear pathway for advancing to technology enabled recycling to treat any make of tyre and, reduce it to separated fractions which can then be beneficiated for purposes of secondary use materials.	Product innovation and evolution is company specific and will contribute to ELT circular economy in reducing amount of waste tyres and ability of tyres to be 100% recyclable. The TWAMISA Plan does not propose any innovative or efficient OTR waste tyre management systems and processing methods.
Cost-effectiveness of Plan	Is the financial proposal or cost structure for implementation of the industry waste management plan reasonable and does it provide revenue generation projections? The plan must provide a detailed breakdown of costs and revenue projections including the provision for costed annual implementation plan with performance targets.	All plans submitted do not cover the cost and investment required for recycling a single tyre. The SATMC further submits that the plans do not engender confidence in respect of the cost base and whether the current quantum of the environmental levy on tyres (R2 30/kg) will sufficiently cover waste tyre management activities. Furthermore, none of the plans submitted have undertaken a feasibility study in respect of the contents of their plans. In this regard, the 5-year tenure for industry tyre waste management plans are not cost effective and sustainable and therefore necessitates a fundamental review. The Waste Management Bureau should also conduct a due diligence of its cost structure currently adopted to undertake and act as a cost-effective waste tyre management in the absence of REDISA. This will assist in informing the principles of waste tyre management of the Department in fulfilling the industry's EPR obligations. The Ministerial approved waste tyre management plan will be funded by, collection, transportation and storage of waste tyres. Evergreen has not demonstrated any experience in ELT recycling nor capacity or upskilling and training as their entire plan is	The Evergreen "Plan" is a project and is dependent on financing and funding from any party. Their pricing and payment strategy only applies to the end product generated from one processing method i.e. pyrolysis. It does not account for the entire ELT cycle, from the point at which tyres are removed from the primary product or mode of transport and enters the waste stream. The cost projection cannot be funded by a reallocation of the Waste Tyre Levy, which is only focused on one type of processing i.e. pyrolysis. Evergreen has put forward their budget requirements, which includes land allocation, or the buying and renting of property in order to set-up and establish a plant and thereafter equip the plant for pyrolysis. The Minister of Environmental Affairs cannot sponsor such a plan, on the basis that it is requesting the Minister to allocate land for the purposes of the plan. Nor can the Minister sponsoring the renting or buying of property for the same purpose. The Waste Tyre Levy and allocation for waste tyre management provided to the Department of Environmental Affairs (DEA) should not provide for the establishment of operations, the equipment and labour force to provide one operational tyre processing method (i.e. pyrolysis) for and in one province (i.e. Mpumalanga Province). The firm start-up cost to set-up one processing plant cannot be justified. This money should go towards actual waste management activities, inclusive of a variety of processing methods. Evergreen plans are subject to grant application and funding approvals. The tyre manufacturing industry cannot support a release and dependency for their EPR obligation to be fulfilled on the basis of uncertain funding requirements. Nor can the industry support the instilling and commencement of waste tyre recycling as it is not an entrenched practice in the country. Moreover, the tyre manufacturers cannot provide financial support by way of its payment of the Waste Tyre Levy, for Evergreen to offer services beyond the tyre waste stream.	JPC proposes that income will be generated from the sale of products. Management and mentor fees towards JPC 10% on turnover for overseeing the processing plants and operations. JPC has used the quantum of the tyre levy as a basis for determining the compensation for labour force required for the plants and inclusive of collectors, depots and couriers. This includes an approach of such a PPP will be obtained, considering the fact that the tyre levy is a contracting party are regulated by National Treasury.	SATRUCCO has costed its plan on utilising and being allocated the entire quantum of the Tyre Levy at R2,30/kg. SATRUCCO has furthermore proposed an increase in the Tyre Levy to R2,50/kg based on the new skills set required and category of resources necessary to implement their plan. In addition, SATRUCCO proposes further additional costs should Government want to utilise SATRUCCO's services and equipment for the abatement of Off Road Tyres. SATRUCCO's plan is therefore not a financial viable proposition for the tyre manufacturing industry.	The Tyre Levy cannot be ring-fenced as proposed by TWAMISA, to only fund OTR waste tyre management. The DEA will receive an allocation for waste tyre management based on the principle of the tyre levy intended to service the waste management requirements of all tyre specifications. Therefore OTR tyres cannot be distinct therefrom. TWAMISA is also requesting funding for OTR waste tyres which exceeds the quantum of the tyre levy applicable to all specifications of tyres. TWAMISA has not provided a detailed costing in respect of the funds needed to recycle an OTR waste tyre and thus has failed to provide the rationale for an increase in the allocation for OTR tyre waste management. The tyre levy cannot be used to fund 2 separate industry waste management plans.
	Do the governance structures proposed in the industry waste management plans enable clear identification of all parties involved in the industry waste management plan, their respective roles and does it provide revenue generation projections? The plan must provide a detailed breakdown of costs and revenue projections including the provision for costed annual implementation plan with performance targets.	The SATMC is of the view that a simple governance structure is best suited for the purposes of implementing and administering an industry waste tyre management plan. The governance structures of the appointed implementer and administrator of the plan must allow for and enable oversight, accountability and transparency measures for the tyre manufacturing industry. The SATMC proposes that it forms part of the governance structure due to its inherent EPR commitments and obligations. Therefore the SATMC proposes to use the legislated Waste Tyre Forum established by DEA for oversight and oversight by the tyre manufacturing industry, as the immediate affected stakeholder and interest party to intervene in order to address matters arising from the implementation of the Ministerial approved Industry Waste Tyre Plan. The SATMC proposes that this Forum is legally recognised as having decision-making powers and therefore no waste tyre management plan should be approved without the Waste Tyre Forum being established tyre management provided	Evergreen plans do not constitute a waste tyre management plan and will seek to work with other plan submitors who are appointed to fulfil one aspect of a processing method for tyres. Therefore they have not included any proposals regarding governance or oversight structures nor do they delineate the roles within any structures outside of the project establishing a pyrolysis plant.	JPC proposes a Public Private Partnership (PPP) contracting and implementation model. However, the JPC Plan does not specify how the regulatory process for approval of such a PPP will be obtained, considering the fact that the tyre levy is a contracting party are regulated by National Treasury.	SATRUCCO has presented a complex management structure for the implementation and administration of their industry waste tyre management plan. SATRUCCO has proposed the appointment of an Independent Waste Monitor (IWM) for a 5-year period to monitor the implementation of the plan. According to SATRUCCO the plan will be governed by a service level agreement between the SATRUCCO Board and the IWM. The IWM will conduct performance audits in respect of the implementation of the plan and will report quarterly to the Board and WMB. If SATRUCCO's plan is approved they should report directly to the WMB not via a 3rd Party. Furthermore, SATRUCCO should monitor their own performance and enable direct performance monitoring by the WMB. It is not clear in terms of budget allocation how much the plan will fund the IWM. SATRUCCO seeks to establish a Waste Tyre Forum to act as a consultative body and exchange industry related information. This Forum will then nominate the industry representative on the SATRUCCO Board. Given the diversity of industry representation that will reside in the Forum it is unclear on what basis a single industry representative will then be afforded a seat on the Board and how this will affect reconciling different views of industry players.	TWAMISA proposes an overall organizational structure for the industry, centred on a single perpetual non-profit company (NPC) to serve as the custodian of the industry strategy and the convergence point for the multiple specialised plans which will collectively implement the industry strategy. There is no need for the formulation of an NPC structure to deliver, implement or administer OTR or waste tyre management services. It is not a prerequisite or requirement that the NPC be in terms of legislation. The TWAMISA Plan like all other plans should operate on a commercial basis to execute the plan as directed by that the waste tyre management practitioners. The industry waste management plan implementer or parties contracted to execute waste management activities should be and are accountable to the DEA and the WMB - there is no need for a further structure to be the governing body under WMB oversight of a plan implementer. An NPC structure introduces an unnecessary layer of additional government controls, effectively creating a quasi-government entity.
Governance and Oversight Structures	Are the targets proposed in the industry waste management plans clear, defined, measurable and realistic (specific attention should be focused on job creation both format and informal)?	All plans do not consider the use of existing infrastructure and only put forward interim solutions in respect of waste tyre management. Therefore targets and performance indicators are either absent or unrealistic and thus cannot successfully meet the tyre manufacturers EPR obligation. The SATMC submits that the Build the waste tyre management and processing plan must be built over time and therefore a 5-year tenure to provide an interim solution is unsustainable, non feasible and does not present any value to the tyre manufacturers. Government should not use the capital and assets for waste tyre management and therefore it can be used and transferred by any plan submitter and does not present a risk in the consistency of the provision of waste management services.	Evergreen does not include any targets or performance indicators guiding its implementation of the project. Due to the fact that this is a new technology and start-up enterprise, it does not identify measurable and realistic targets in support of waste management using pyrolysis. Evergreen has not demonstrated an ability to up-scale operations beyond one plant, nor have they taken into account the volume of tyres in relation to their processing capacity. They have only considered the volume of tyres required to produce a specific quantum of selected products.	JPC has provided an outline for potential job creation opportunities including the labour force for the plants and (tyre/waste collectors, couriers and depots (micro and small enterprises). JPC has provided the initial set up capacity for plants to process waste tyres, municipal solid waste and plastics. However, it does not define targets or how these would be measured or monitored including job creation and waste collection, recycling and processing.	SATRUCCO provides an outline of the waste management targets including job creation projections. However, it is unclear as to the applicable timelines for achieving these targets. The targets are not segmented per year but rather provided as a lump sum over the 5-year tenure.	The envisaged timelines for managing all OTR waste tyres are unrealistic. The plan only proposes 50% implementation of OTR waste management activities in the second-last year of its 5-year tenure. The timelines for upscaling are only provided for in year 4 and 5 and therefore does not support the full-scale implementation of a waste tyre management or OTR plan. This effectively means that if targets are not met by TWAMISA upon expiration of its 5-year tenure, the industry plan proposer will have to deal with legacy waste and stockpiles yet again, continuing the past REDISA cycle. The TWAMISA Plan requires significant capital and capacity prior to implementation. Its structures and programmes are not set-up or established yet. Therefore, it cannot realistically be in a position to execute its activities on day 61, after the Minister approves a plan.
	Is there adequate provision in the industry waste 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 plans published only propose interim solutions to address waste tyre management. Furthermore, these SATMC is also not address the interim remedies sought by the industry since the seizure of REDISA operations. Therefore the SATMC is of the view that it cannot wait for plans to be approved which only provide temporary solutions. Accordingly, the mandate and activities of the Waste Management Bureau are critical to obtaining and improving effective waste tyre management.	Evergreen has not provided a template for monitoring, reporting and oversight, including accountability mechanisms.	JPC proposed that they will oversee and monitor processing operations including the tyre/waste collectors, couriers and depots. JPC will be responsible audited financial management and controls of the tyre levy disposal fees.	SATRUCCO is a registered NPC. While SATRUCCO has confirmed that they will comply in accordance with King IV, this is insufficient in respect of the accountability, monitoring and oversight applicable to an entity implementing and administering a plan on behalf of the tyre manufacturing industry and DEA.	TWAMISA proposed to fulfil the role of overseeing and monitoring of implementation of the OTR waste tyre management plan. The role of TWAMISA should not be overseen and monitor the implementation of a plan. Instead, it should report to DEA and the Waste Management Bureau on the implementation and performance of the Plan. The TWAMISA Governance Structure effectively obscures accountability.
Will the plan ensure training and development towards the creation of new sustainable jobs?	The SATMC supports the principle of formalising the informal sector and contributing to training, skills development and job creation. However, we argue that these are the by-products and products of efficient and effective waste tyre management throughout the recycling system and is not the primary objective of industry waste tyre management plans.	Evergreen proposes to undertake a study tour to China to gain the relevant experience and knowledge for the establishment and operationalisation of a pyrolysis plant. Evergreen should have the capacity, know-how and at the very least, the ability to procure the necessary skills in support of the execution of their plans.	JPC has proposed scholarships and training programmes for 100 persons over a 4-year term. However, the extent to which these will support their proposed waste tyre management and processing activities is unclear.	The SATRUCCO Plan is heavily geared towards upskilling and poverty alleviation. They have committed to contributing to skills development and training as well as job creation. These activities will be run as separate programmes funded by SATRUCCO, which does not constitute a waste management activity.	TWAMISA proposes extensive programmes to contribute toward training, skills development and entrepreneurial incubation. The TWAMISA Plan is skewed in favour of pooling funds and offering incentives to the private sector to advance their CSR/CSI initiatives.	
	How does the plan purport to promote small and medium enterprises?	The SATMC supports the principle of promoting and supporting the development of small and medium enterprises, this must not be funded by the tyre levy. However, these enterprises must be supported by assisting via other means.	Evergreen itself is a start-up and seeks to put forward a model for sustainable waste tyre processing via pyrolysis. It is their contention that once this model is established, they will make the equipment thereof to anyone who wishes to undertake such activities and replicate their model in other provinces. They therefore see the manufacturing of this intellectual property (IP) as promoting entrepreneurship and innovation.	JPC has put forward a proposal regarding the development and support of micro, small and medium enterprises via the establishment of processing plants and throughout the waste tyre value chain focusing on waste tyre collection, couriers and depots. This is heavily dependent on the establishment of the plants and the method of processing (pyrolysis) waste tyres becoming sustainable. Moreover, the preferred method of processing is high risk with an unproven track record.	SATRUCCO proposes to integrate Previously Disadvantaged Individuals (PDI) through putting out a call for SMMEs in township and rural communities. SATRUCCO proposed to engage Civic bodies to identify groups of people who will set up cooperatives and small businesses in the townships and rural areas where applicable.	TWAMISA proposes SMME funding and incentive schemes to support incubation and development of these enterprises, offer support to expand the scope of waste tyre management. TWAMISA focuses too heavily on enterprise development, which constitutes a primary objective and does not adequately address OTR waste tyre management processing methods.
Comment on the extent to which Black owned businesses would be empowered to participate meaningfully in the plan?	The SATMC supports the principle of empowerment but this should not be the primary focus of waste tyre management plans. Moreover, all plans do not allocate a substantive percentage of its capital towards developing BBBBEE and enabling meaningful empowerment.	Evergreen itself is a black-owned business. It does not specifically outline how it would contribute to empowerment and the participation of black-owned businesses in their project.	JPC proposes that the provincial processing plants will have 100% shareholding transfer to local communities.	SATRUCCO proposes to integrate Previously Disadvantaged Individuals (PDI) through putting out a call for SMMEs in township and rural communities. SATRUCCO proposed to engage Civic bodies to identify groups of people who will set up cooperatives and small businesses in the townships and rural areas where applicable. SATRUCCO also proposes that all pre-processing operators will be assisted to become B-BBEE compliant.	TWAMISA seeks to offer the private sector incentives to improve and advance their empowerment and BBBBEE rating, by offering partnerships or sponsorships for enterprises being incubated. This does not constitute meaningful participation of black owned businesses in the plan.	
Does the plan address social upliftment of the vulnerable communities they operate in?	The SATMC is of the view that all plans should have a Corporate Social Investment (CSI) feature. However, this should not constitute the backbone of such plans. The CSI is only one part of a plan and the implementer and administrator of the plan must define and clearly articulate this. Accordingly, CSI should not be the overarching principle of an industry waste tyre management plan. The SATMC proposes that all Plans should provide an overview of what the best practices are globally in respect of CSI and waste tyre management and on this basis determine what is feasible for South Africa and what they are able to do inclusive of the business model and financial plan to support this.	Evergreen does not propose any social upliftment activities as part of its processing of waste tyres. Nor does it account for how vulnerable communities will be supported through the establishment of their pyrolysis plant in Mpumalanga Province.	JPC proposed to give back to the community and vulnerable persons by sharing the profits from the sale of its by-products/products generated from the processing of waste tyres via pyrolysis. However, they do not include the quantum and frequency of such profit sharing.	The SATRUCCO plan contains a wide variety of socio-economic empowerment and development initiatives envisaged to benefit market. However, this should not be the focus of an industry waste tyre management plan.	CSR and CSI are not primary activities in respect of waste tyre management. Nor is the objective to provide such opportunities to the private sector. Accordingly, it is not the role of TWAMISA to develop and expand the tyre waste management industry, into something else. Social upliftment should not be the sole objective of implementing a waste management plan. It should however constitute a consistent outcome and by-product of the effective implementation and administration of OTR waste specifically within vulnerable mining communities.	
How does the plan contribute to national awareness regarding waste tyre management?	The SATMC is of the view that national awareness regarding waste tyre management is the preserve of Government and the Department of Environmental Affairs. Therefore the tyre levy paid by the tyre manufacturers should not be used for a 3rd party to undertake awareness campaigns. Therefore awareness raising campaigns should not be a feature or component of an industry waste tyre management plan.	Evergreen has not stipulated how its project will specifically contribute to national awareness regarding waste tyre management. They have deliberately excluded any national awareness raising campaigns.	National awareness regarding waste tyre management is the preserve of Government, the Department of Environmental Affairs. The tyre manufacturers should not be contributing to this with the tyre levy for waste management.	SATRUCCO proposes to undertake a national awareness campaign to raise national awareness regarding the management of waste tyres. SATRUCCO proposed this plan to be crafted by an appointed executive committee. SATRUCCO proposes that this be informed by an audit of what, where and how these campaigns will be run across South Africa in various languages. National awareness regarding waste tyre management is the preserve of Government, the Department of Environmental Affairs. The tyre manufacturers should not be contributing to this with the tyre levy for waste management.	National awareness regarding waste tyre management is the preserve of Government and the Department of Environmental Affairs. Therefore the tyre levy paid by the tyre manufacturers should not be used for a 3rd party to undertake awareness campaigns on behalf of the State, as put forward in the TWAMISA Plan. Therefore awareness raising campaigns should not be a feature or component of an OTR waste tyre management plan. Plans should only focus on the delivery of services to build a waste tyre circular economy.	
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.	The SATMC is of the view that SATRUCCO, Evergreen Energy and JPC Energy did not undertake an extensive and comprehensive consultation and engagement process regarding its draft waste tyre management plans as set out in the criteria for the assessment of plans. The 5 June 2018, is the first time that the SATMC engaged in a consultation forum with SATRUCCO, Evergreen Energy and JPC Energy and TWAMISA. To date, the SATMC and its members have not expressed explicit support in writing or verbally for any of the 4 waste tyre management plans submitted. While the SATMC may have supplied information solicited by TWAMISA in respect of its draft waste tyre management plan, this was not consultation nor approval of the contents of any plans. TWAMISA has indicated in its accompanying documentation that it consulted the SATMC on its draft plan, upon which TWAMISA stated that the SATMC had supported the plan in its entirety. This is factually incorrect and is therefore a false statement put forward by TWAMISA. While individual consultation with members of the SATMC may have been undertaken with member companies this does not constitute support or engagement by and on behalf of the SATMC.	Evergreen has not provided the necessary document to suggest that they have undertaken an extensive consultation process on their proposed plan. They have not shown that they have engaged with the tyre manufacturers prior to submitting their draft plan for consideration.	JPC has not provided the necessary document to suggest that they have undertaken an extensive consultation process on their proposed plan. They have not shown that they have engaged with the tyre manufacturers prior to submitting their draft plan for consideration. Moreover, they have not participated in the provincial public hearings but have made themselves available for one engagement with the SATMC and its members on 5 June 2018 during which they presented their industry waste management plan.	The SATMC and its members undertook its first formal engagement with SATRUCCO on 5 June 2018, two days prior to this commentary being due to the Department of Environmental Affairs. During the public hearings SATRUCCO stated that it established an extensive consultation and engagement programme re its draft waste tyre management plan. SATRUCCO had cited engagements with the SATMC and its members since 2016, which is factually incorrect. Furthermore, the SATMC has not explicitly or otherwise expressed support for any plan.	The Consultation process as set out in the TWAMISA IWTMP Consultation Process document as published and provided for is incorrect and inconsistent. It does not represent the view of the SATMC nor the decisions and the discussions which have taken place to date. At no point did the SATMC provide their explicit or otherwise support of the TWAMISA plan.	