

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

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**SUBJECT: COMMENTS ON PACKAGING SA INDUSTRY WASTE MANAGEMENT
PLAN (IWMP)**

DUE: 20 AUGUST 2018

1. DISCUSSION

In terms of Section 28 of the National Environmental Management Waste Act #59 of 2008 (NEMWA) and as amended, the Government Notice 41303 of December 2017 announced a Public Participation Process for the Packaging SA Industry Waste Management Plan for the Paper and Packaging sector in SA, which will be based on the Extended Producer Responsibility (EPR) Model and submitted by the Packaging SA (NPC) EPR Plan to the Minister: Department of Environmental Affairs (DEA) by 05 September 2018 with JG Afrika (Pty) Ltd acting as the consultant.¹

This project is an Integrated Industry Waste Management “Federation of Plans” and as such, it reads like a federation of plans. That is, there is a lot of duplicating overlaps with many sections being able to be combined. What is of more concern is the perception this leaves on the holistic waste management being fragmented and synergies not being exploited. Surely there are economies of scale and reduction of “head office” overheads advantages that can be derived. For instance, can the FTE river and beach clean-ups pass on other recyclables to their respective producers? Other collector collaborations should surely be possible.

Although the total collected recyclables of 58% may seem commendable, we ask about the other 42% that is landing up in our landfill sites, rivers and oceans. We appreciate that the sector wants to minimise, recycle, recover and strive for zero packaging and paper waste to landfill. However, in terms of Section 16(2) National Environmental Management Waste Act #59 of 2008 avoiding the generation and reducing waste, Section 6 (1) (5) (e) prevent pollution (f) minimise the generation of a waste stream and the Australian National Waste Policy of November 2009 model, we want to see further compliance via a 10% reduction of the 2017 tonnage produced per annum in every sector. We think this will change the consumer culture to rather taking their reusable shopping bags with them as they cannot be purchased at the retailers.

¹ Download from: <http://www.jgafrika.com/projects/#public-participation> or
<https://www.packagingsa.co.za/?s=Industry+Waste+Management+Plan> – after registering as an
Interested and Affected Person

Part of our unrecycled plastic is landing up in our oceans as microbeads / microplastics. South Africa is the 11th worst plastic polluting country in the world; see below.

Rank	Country	Waste Generation Rate	% of Waste that Is Plastic	% Mismanaged Waste	Plastic Waste	% Mismanaged Plastic Waste	Marine Debris
		[kg/ppd]			[MMT/yr]		[MMT/yr]
1	China	1.10	11	76	8.82	27.7	1.32-3.53
2	Indonesia	0.52	11	83	3.22	10.1	0.48-1.29
3	Philippines	0.5	15	83	1.88	5.9	0.28-0.75
4	Vietnam	0.79	13	88	1.83	5.8	0.28-0.73
5	Sri Lanka	5.1	7	84	1.59	5.0	0.24-0.64
6	Thailand	1.2	12	75	1.03	3.2	0.15-0.41
7	Egypt	1.37	13	69	0.97	3.0	0.15-0.39
8	Malaysia	1.52	13	57	0.94	2.9	0.14-0.37
9	Nigeria	0.79	13	83	0.85	2.7	0.13-0.34
10	Bangladesh	0.43	8	89	0.79	2.5	0.12-0.31
11	South Africa	2.0	12	56	0.63	2.0	0.09-0.25
12	India	0.34	3	87	0.60	1.9	0.09-0.24
13	Algeria	1.2	12	60	0.52	1.6	0.08-0.21
14	Turkey	1.77	12	18	0.49	1.5	0.07-0.19
15	Pakistan	0.79	13	88	0.48	1.5	0.07-0.19
16	Brazil	1.03	16	11	0.47	1.5	0.07-0.19
17	Burma	0.44	17	89	0.46	1.4	0.07-0.18
18*	Morocco	1.46	5	68	0.31	1.0	0.05-0.12
19	North Korea	0.6	9	90	0.30	1.0	0.05-0.12
20	United States	2.58	13	2	0.28	0.9	0.04-0.11

Table: (Jambeck, J. R., et al. "Plastic Waste Inputs from Land Into the Ocean." Science, vol. 347, no. 6223, 13 Feb. 2015, pp. 768-771., doi:10.1126/science.1260352). Waste estimates for 2010 for the top 20 countries ranked by mass of mismanaged plastic waste (in units of millions of metric tons per year). Interpretation of characters in the table: Mismanaged waste is the sum of inadequately managed waste plus 2% littering. Total mismanaged plastic waste is calculated for populations within 50 km of the coast in the 192 countries considered. ppd, person per day; MMT, million metric tons. If considered collectively, coastal European Union countries (23 total) would rank eighteenth on the list.

Errors

On page 17, 'Packaging SA is well "paced" or well "placed" to oversee'?

3.2.1.f) repeats "f." on page 35.

In section 5.5 on page 39 "per annually" should be "per annum" or "annually".

PVC-U and PVC-P are not defined.

Style

In general, a comma just before “and” is an Americanism.

“stablished” on page 113 is an archaic form of established.

Summary

Other than the duplications, this was an enjoyable read. The industry specific data was interesting, ex. percentage recoverable, light-weighting reductions, etc. Also, the Packaging concept sounds promising.

It is noted on pages 14 and 27 that Packaging SA as a non-profit company, membership-based volunteer organisation has no real teeth for enforcement. We support “that collection of fees method has not been successful and had many challenges”.

We are encouraged by the proposed Packaging SA EPR Structure on page 24, which aims to provide the most efficient and cost-effective model to ensure transparency, good governance and ethical conduct. Our concern here is the growth of head office expenses and conflicts of interest.

We are concerned that some of the fees per annum on page 31 might be unaffordable for some of the smaller players.

Practical Suggestions

Can someone please look at the long lines of broken glass leaving the N1 heading off at diagonals to the road into the Karoo?

We would like to see the used edible oil converted into bio-diesel fuel.

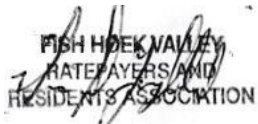
If only four percent of foam packaging is polystyrene with the rest being air, page 111, can it not be flattened or low heat treated to reduce its volume?

2. RECOMMENDATIONS

Therefore, for the reasons set out in this report, we recommend the following:

- All industries represented in the paper and packaging material streams consolidate their efforts under one corporate body;
- A 10% reduction per year from the 2017 tonnage produced by the combined streams with immediate banning of non-recyclables / non-reusables and certain harmful products such as vinyl cling and number seven packets;
- An attempt is made to lobby the Minister: Department of Environmental Affairs to get relevant legislation (National Environmental Management Waste Act #59 of 2008) changed:
 - To make membership in Packaging SA mandatory for the relevant producers and importers, at least, with appropriately affordable fees; and

- To make Packaging SA the sole owner of the Industry Waste Management Plan.

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