

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

Central Circle, Fish Hoek 7975

Web: <https://www.fishhoekratepayers.com/> Facebook: www.facebook.com/FHVRRA/

Heritage Western Cape: Conservation Body

TO: The Director-General: Department of Environment, Forestry and Fisheries
Attention: Mr Pamela Nxumalo pnxumalo@environment.gov.za

SUBJECT: COMMENTS ON NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AMENDMENTS TO THE ENVIRONMENT CONSERVATION ACT PLASTIC CARRIER BAGS AND PLASTIC FLAT BAGS REGULATIONS OF 2003¹

DUE DATE: 7 SEPTEMBER 2020 (30 DAYS FROM 7 AUGUST)

1. DISCUSSION

Thank you for this opportunity to comment on this important legislative amendment. Our sincerest wish is that the Minister or Department actually considers the changes requested.

We argue for the removal of “and imported” in Regulation 2 (1) as this wouldn’t negatively impact local jobs. In fact, it would promote local jobs as the distributors would then base their buying decision purely on an economic basis and probably choose cheaper locally produced plastic carrier and plastic flat bags that would still be allowed to contain the cheaper non-recyclates.

South Africans are procrastinators by habit, for example, note the long last minute queues in August for motor licence renewals although a whole month was allowed to catch-up from the lockdown restrictions on renewals. Therefore, we recommend a more aggressive time schedule than proposed in Regulation 2 (2) and (3). A minimum 50% post-consumer recyclate is possible from 01 June 2021, 75% by 01 January 2023 and 100% by 01 June 2023 for production and distribution with the later to prevent large orders for stockpiling.

We agree with the offences and penalties in Regulation 3. We hope that the Department of Environment, Forestry and Fisheries will have sufficient manpower for enforcement or a strong relationship with law enforcement agencies to ensure compliance.

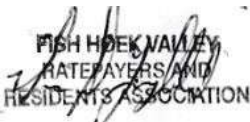
On 14 July 2017 we requested that the Minister ban the production and distribution of plastic bags containing chalk (calcium carbonate) as these result in non-recyclable plastic and single-use plastic bags. Also, that all bags have a minimum thickness greater than 80 microns and exclusively use virgin or recycled PE-HD polymer. Since then, environmentally friendly, biodegradable replacements, such as those using cellulose from sugarcane and forest fibre are being used in the manufacture of “plastic” bags. Sappi has huge forests in South Africa and facilities to make appropriate wood pulp.

¹ Government Notice No. R. 625 in Government Gazette No. 24839 of 9 May 2003

2. SUMMARY OF RECOMMENDATIONS

In conclusion, we recommend that:

- imported bags are required to be of 100% recycle immediately; and
- more aggressive phasing out dates for local production and distribution of:
 - 50% post-consumer recycle by 01 June 2021;
 - 75% by 01 January 2023 and
 - 100% by 01 June 2023.

NAME & SURNAME	Brian Youngblood, Chair: Fish Hoek Valley Residents and Ratepayers Association (FHVRRA)
CONTACT NUMBER	Cell: 084 3 99 99 33
E-MAIL ADDRESS	bdyoungblood@gmail.com or FishHoekRRA@gmail.com
SIGNATURE	
DATE	5 September 2020