

**CITY OF CAPE TOWN
3RD GENERATION
INTEGRATED WASTE MANAGEMENT PLAN DELIVERABLES
PECTO NPC COMMENT
31 OCTOBER 2016**

Introduction

The PET Recycling Company NPC t/a PETCO welcomes the invitation from the City of Cape Town (CoCT) to comment on the deliverables of the City's 3rd Generation Integrated Waste Management Plan (IWMP).

We have reviewed the deliverables and we support their inclusion in the drafting of the City's 3rd Generation IWMP. We would however like to see additional considerations be included in the IWMP which we have detailed below.

Integration of the informal sector

The informal sector and waste pickers (also known as reclaimers) will be present in the system. The IWMP deliverables should make provision for their inclusion. The presence of reclaimers will affect several aspects of the IWMP:

- Revenue from certain recyclables will be claimed by the reclaimers. The financial viability of projects should be tested with sensitivity analyses conducted for varying yields on collected material.
- Drop-off points, split bin systems and any other publicly accessible central points of waste collection that are not privately managed should be designed with access for reclaimers in mind.
- Reclaimers are likely to attempt to access the materials whether they are permitted to or not, so provision should be made for them to do so where possible in a way that is safe and minimizes negative environmental and cleanliness impacts.
- Material Recovery Facilities (MRFs) and other central collection/sorting locations should be designed to allow reclaimers to sell material to them.

PETCO is in the position to assist the City directly in this regard and can draw on our experience and existing programmes.



**Plastic bottles
are not trash.**

Inclusion of Previously Disadvantaged Individuals (PDIs)

We request that emphasis be placed on promoting the inclusion of PDIs in the recycling and waste management economy by creating, or linking to existing, policies that make provision for PDIs to be given the opportunity to manage drop-off points, collection systems, MRFs etc.

Organisations such as ourselves, groundWorks, the International Labor Organization (ILO) and Women in Informal Employment: Globalizing and Organizing (WEIGO) can assist in this regard.

End-use markets

The collection of material is inextricably tied to the end-use markets for that material. A lack of end-use markets will result in material being stored and/or sent to landfill.

The IWMP should address end-use markets as thoroughly as possible, with measures such as:

- Identifying markets and buyers for the material.
- Seeking input from the businesses and NGOs on how much material and what type of material can be absorbed.
- Clarify assumptions of end-use market off-take, allowing bodies such as PETCO to inform the CoCT when the underlying assumptions have changed.
- Make provision for periodic review of the underlying assumptions of end-use markets.
- Establishing / linking to the CoCT Green Procurement programmes to develop end-use markets for recycled products.
- Providing incentives (such as reduction on waste management fees/rates) for organisations that purchase locally-produced recycled products.
- Propose additional end-use market incentives or support.

Sharing data, best practices and lessons learnt

The IWMP should make provision for sharing data, best practices and lessons learnt from implementing these projects and programmes. There will be a wealth of information that will assist many parties in making these and other programmes a success.

We would like to see such information sharing related to:

- Public awareness campaigns: measuring and evaluating the effectiveness of campaigns.
- Split bin system: Data on participation rates, effective marketing methods, waste profiles etc.

- Ringfenced financial system: Data will assist in establish full-cost account baselines for waste management.
- Job creation statistics should also be measured.
- Waste to energy performance, viability and integration.

Public-Private Partnerships (PPP) & Extended Producer Responsibility (EPR) funding

PETCO would like to see provision made for (Extended Producer Responsibility) EPR organisations to be able to make financial contributions to projects as a mechanism for meeting their EPR obligations and in so doing, claim benefits of waste reduction, infrastructure spend and job creation from those contributions.

Where funding is collected by the Government on waste material e.g. plastic bags and soon, tyres, the IWMP should have mechanisms in place to apply for funding from Government for IWMP projects, where projects manage that product waste.

We also believe that off balance-sheet agreements may provide the opportunity for more flexible arrangements that assist faster roll-out of certain types of projects. For example, providing access to land for buyback centers to be established by the private sector may be quicker /easier for the City than entering a joint-venture partnership.

With that said, we believe that there should be a wide variety of PPP models available to be employed, and it would help if the City could identify these along with the roles/expectations and requirements of participating parties. This would help us in seeking out the relevant partnerships that will readily fit within the framework provided by the City. For example, a model that calls for participants to provide Personal Protective Equipment, cages or other equipment would be welcomed by PETCO.

Material Recovery Facilities (MRFs)

Where the City develops MRFs, small MRFs or even Plastic Recovery Facilities (PRFs), we request that the City considers the possibility of separating Plastics fractions into their individual material streams and not grouping them as a singular material type. We recommend consulting with industry for input on materials being sought.

In conjunction with industry, there may also be options for financial support from PETCO and others for equipment e.g. infra-red sorting.

Organisations such as PETCO should also be consulted to provide input into the design requirements for such facilities.

Waste-to-Energy

The plans for waste to energy should be carefully planned and viability based on recycling non-recycled fractions, as well as to cap total installed capacity in the CoCT to reasonable levels so as not to affect the viability of recycling streams.

Waste to energy projects will face several challenges, some of which we have highlighted in our discussion document which can be found at www.petco.co.za/energyrecovery. We request that the IWMP requires the Transaction Advisor to address these challenges.

Awareness

PETCO suggest that the City lists the programmes that are currently in place for public education and awareness. Additionally, there should be clarity in how this links in with the national awareness campaigns that are being rolled out by the Department of Environmental Affairs.

We also would like to see detail about the Monitoring and Evaluation that will be put in place e.g. research to track behavior change or increased awareness resulting from awareness campaigns.

Descriptions of the plan for dealing with public comments and feedback would be most valuable, as would identification of the partners the City will be working with to raise awareness e.g. zoo's, aquaria or prominent NGOs.

Share implementation plans and updates on progress

PETCO requests that IWMP projects and programmes implementation plans be shared to allow organisations such as ours to identify where we can leverage partnerships which assist the CoCT and ourselves to meet common objectives.