

**NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008
(ACT NO. 59 OF 2008)**

GAZETTE No. 40490 NOTICE No. 1556

PROPOSED AMENDMENTS TO NATIONAL WASTE INFORMATION REGULATIONS

SUBMISSION BY PET RECYCLING COMPANY (PTY) LTD (PETCO)

12 January 2017

Comments

Our only comment on the proposed amendments related to the scope of “Transportation of Waste” as proposed for inclusion in Annexure 1 of the regulations.

The current scope is too broad, as it would require all those in the informal sector, “trolley pushers”, very small businesses and sole operators, as well as casual or ad-hoc transportation of waste by transport companies to have to register with SAWIS.

This will result in high levels of non-compliance for several reasons:

- Ad hoc transporters of waste will likely be unaware of the registration requirements, or may opt to stop offering services – thus raising the cost of transporting waste by reducing competition in the sector.
- The informal sector often lacks the systems necessary for recording and submitting the information as required by the regulations – additional red tape may further dissuade them from integrating into the formal sector.
- Trolley pushers will not have the means to record or submit information.
- Small and very small businesses will likely not have the human resource capacity required to collect, verify, and submit data – further dis-incentivising participation in the economy as formal businesses.