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The Director -General: Department of Environmental Affairs
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PRETORIA
0001

ATTENTION: Ms. Nolwazi Tetyana

17 May 2017

RE: DRAFT NATIONAL NORMS AND STANDARDS FOR THE SORTING, SHREDDING, GRINDING, CRUSHING, SCREENING OR BALING OF GENERAL WASTE

Dear Ms. Tetyana.

With reference to Notice No. 243 in the above regard, as published in the South African Government Gazette of 17 March 2017, we wish to draw your attention to the following items:

1. PETCO, the PET Recycling Company NPC, is the Extended Producer Responsibility organisation for PET recycling in South Africa. In this role, PETCO supports the collection and recycling of post-consumer PET bottles. This support extends across the full spectrum of the PET recycling value chain, from collection and consolidation of post-consumer PET material, to industrial-scale recycling and conversion into various end-use products.
2. Many of the activities supported by the PETCO in the PET recycling value chain, will fall outside the ambit of the Draft National Norms and Standards in question, due to the fact that the size of the operations in question will not exceed 100^m2 in area.
3. With regard to those operations supported by PETCO that will fall within the scope of the Draft Norms and Standards, PETCO has solicited comment from the organisation's industrial-scale PET recycling partners. Based upon the responses received, we would appreciate the Department's consideration of the points raised below.

We would in particular direct the Department's attention to the significance of stipulations related to the management of air quality emissions, which are already regulated under the Ambient Air Quality Standards (as per Government Gazette Notices 1210 of 2009 and 486 of 2012), as well as under the National Dust Control Regulations (Government Gazette Notice 827 of 2013). These Notices were gazetted in terms of the National Environmental Management: Air Quality Act 39 of 2004.

Non-Executive Directors: Brand Owners: Casper Durandt, Coca-Cola SEA (Chair); Vukani Magubane, Coca-Cola SEA. *Bottlers:* Tshidi Ramogase, CCBSA (Vice-Chair); Greg Morse, Peninsula Beverages. *Converters:* David Drew, Boxmore. *Collectors/Recyclers:* Chandru Wadhvani, Extrupet. *Retailers:* Tom McLaughlin, Woolworths; André Nel, Pick n Pay. *Raw Material Producer:* Daniel Schoeman, Hosaf.
PET Recycling Company NPC, Registration Number: 2004/032347/08



**Plastic bottles
are not trash.**

With regard to the Notices mentioned above, it would appear that a number of stipulations included in the Draft Norms and Standards under discussion, provide no additional basis for the installation of equipment or the or undertaking of activities that may cause operations to incur significant costs, and that may already be addressed under the requirements of NEM:AQA.

4. In terms of specific requirements of the Draft National Norms and Standards under discussion, we would draw the Department's attention to the following items:

- a. **Section 8: Operations**

Item 6 requires that "Extraction systems for the extraction of air from enclosed processing areas must be installed through an emission abatement system".

Comment: It would appear that such a blanket requirement holds significant potential cost implications for operators, and that it may prove unnecessary depending on the circumstances at the waste management site, the nature of processes in question and the type of material being processed.

In this regard, it can by no means be definitely stated that all waste management operations generate emissions that require extraction through an abatement system. Many operations generate no significant emissions of particulate matter or other air pollutants, As an example, the majority of industrial-scale PET recycling operations supported by PETCO make use of wet grinding processes, that generate no atmospheric emissions of significance.

As a result, it is PETCO's opinion that the implementation of extraction technologies should be required only in instances where significant emissions are generated, and where these emissions may exceed the levels stipulated in the National Ambient Air Quality Standards and National Dust Control Regulations, as referenced above.

Furthermore, it should be noted that under NEM:AQA, the term "ambient air" excludes air regulated by the Occupational Health and Safety Act No. 85 of 1993.

- b. **Section 8: Operation**

Item 7 requires that "Dust suppression abatement methods must be employed the case where dust emissions are generated from the processing of waste material".

Comment: It is PETCO's opinion that the Draft Norms and Standards are rather vague in this respect. While many industrial processes may generate dust, this does not mean that the environmental impact associated with such processes in in any way significant. As a result, it would appear that this stipulation should apply only in instances in which dust generation exceeds the requirements of the National Dust Control Regulations or the National Ambient Air Quality Standards, as referenced above.



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c. Section 8: Operation

Item 11 states that "The storage of waste must be compliant with the requirements of the National Norms and Standards for the Storage of Waste or the Waste Tyre Regulations, 2009 where applicable".

Comment: It is recommended that this requirement be updated as follows: "The storage of waste must be compliant with the requirements of the National Norms and Standards for the Storage of Waste or the Waste Tyre Regulations of 2009, *or its successor*, as applicable."

On behalf of the PET recycling sector in South Africa, PETCO would like to thank the Department for opportunity to provide inputs to these Draft Norms and Standards. We trust that the points raised above will be of value to the Department in executing its regulatory mandate in this area, and we look forward to further collaboration in the future..

Yours faithfully



Alistair Schorn
Manager: Business Development
PETCO NPC



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