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2008

## NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008

(ACT NO. 59 OF 2008)

GAZETTE No. 41760 NOTICE No. 701

### PROPOSED AMENDMENTS TO THE NATIONAL WASTE INFORMATION REGULATIONS 2012

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

3 August 2018

Please submit responses to: [oscar.baruffa@petco.co.za](mailto:oscar.baruffa@petco.co.za)

#### Comment

PETCO NPC submitted its comment on the prior draft changes to this legislation on 12 January 2017. We have not received nor been made aware of responses to those comments.

These proposed changes to the SAWIS legislation, for transporters of post-consumer packaging waste in particular, pose significant risk to the continued growth of PET recycling in South Africa. There is no discernible benefit of this legislation, however the burden on all businesses large and small will increase. This will also place further barriers to small businesses who currently provide transport services to the PET waste and larger packaging recycling sector.

Since PETCO's incorporation in 2004 and up to 2017, over 600 000 tonnes of post-consumer PET have been successfully transported without the need for transporters to register with the Department of Environmental Affairs. In 2018, we estimate that another 100 000 tonnes will be transported and estimate a 66% recycling rate will be achieved.

Furthermore, the legislation will be unimplementable. Transporters of waste transport many other goods as well. The barrier of entry is low, a bakkie or flatbed truck is all one needs to start, which is why it's such a good job creation opportunity.

The proposed legislation does also still not address the issue of waste pickers / reclaimers who push trolleys on the street.

Our proposal is that post-consumer PET waste be removed from this requirement i.e. GW51-01.

#### Oscar Baruffa, Business and Strategic Planning, PETCO

**Non-Executive Directors:** *Brand Owners:* Casper Durandt, Coca-Cola SEA (Chair); Asyia Sheik, Coca-Cola Africa; *Bottlers:* Tshidi Ramogase, CCBSA (Vice-Chair); Greg Morse, Coca-Cola Peninsula Beverages. *Converters:* David Drew, Boxmore Packaging; Wessel Oelofse, Polyoak Packaging. *Collectors/Recyclers:* Chandru Wadhvani, Extrupet. *Retailers:* Kevin O'Brien, Spar; Lisa Ronquest, Woolworths. *Raw Material Producer:* Gert Claasen, Safripol. *Board appointment:* Linda Godfrey, CSIR.

PET Recycling Company NPC, Registration Number: 2004/032347/08



Plastic bottles  
are not trash.