



Leading Producer Responsibility.

Unpacking the Petco Model

13 September 2023



Competition Act of 1998

STATEMENT OF COMPLIANCE

We the Board of Directors, Members and Management of Petco will always conduct our business affairs in accordance with the law, taking into account principles of good corporate governance.

In particular, we are cognisant of competition law and as a company are committed, at every level, to complying with both the letter and spirit of competition laws.

Petco will not engage in or tolerate any form of conduct which fails to comply with the requirements of competition laws. Forms of anti-competitive conduct include, but are not limited to, agreements or discussions with competitors relating to pricing, allocating or dividing geographic markets, customers or tenders.

We are committed to free and fair competition. If there is any doubt about the legality of certain actions or decisions being taken at our meetings, then this will be referred to our legal counsel or advisers for further investigation or action.

This statement is intended to support our uncompromising company policy to comply in all respects with competition laws.



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- 04** DFFE EPR fee guidelines
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A large stack of compressed plastic waste bales, showing various colors of plastic debris (blue, red, white, brown) tightly packed together. The bales are stacked in a way that creates a textured, layered appearance. The background is a clear blue sky.

Overview of EPR

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Extended Producer Responsibility (EPR) is a resource management tool whereby producers take individual responsibility for the end-of-life management of their used products/packaging.

This can include financial and/or operational responsibility for the collection, sorting and treating of these products/packaging for their recycling and recovery.

This individual responsibility can be partly transferred to a collective entity, called the “Producer Responsibility Organisation” (PRO).

This PRO should fulfil the obligations of their members in the most efficient and effective way.

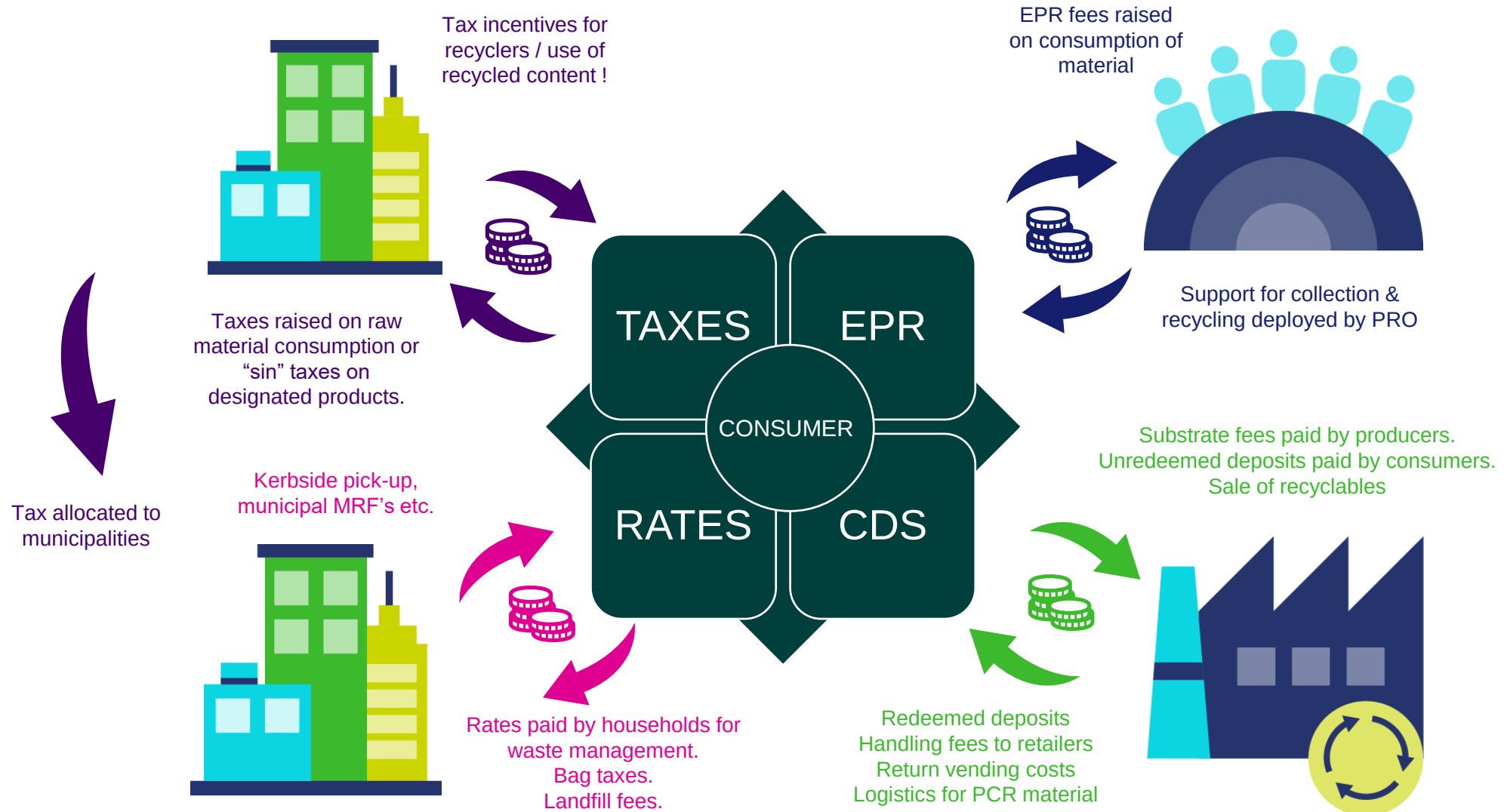
The needed (usually external) costs shall be internalized into the product price.

Higher costs for non-recyclable or difficult to recycle packaging should motivate industry to eco-design their packaging (eco-modulation of fees).



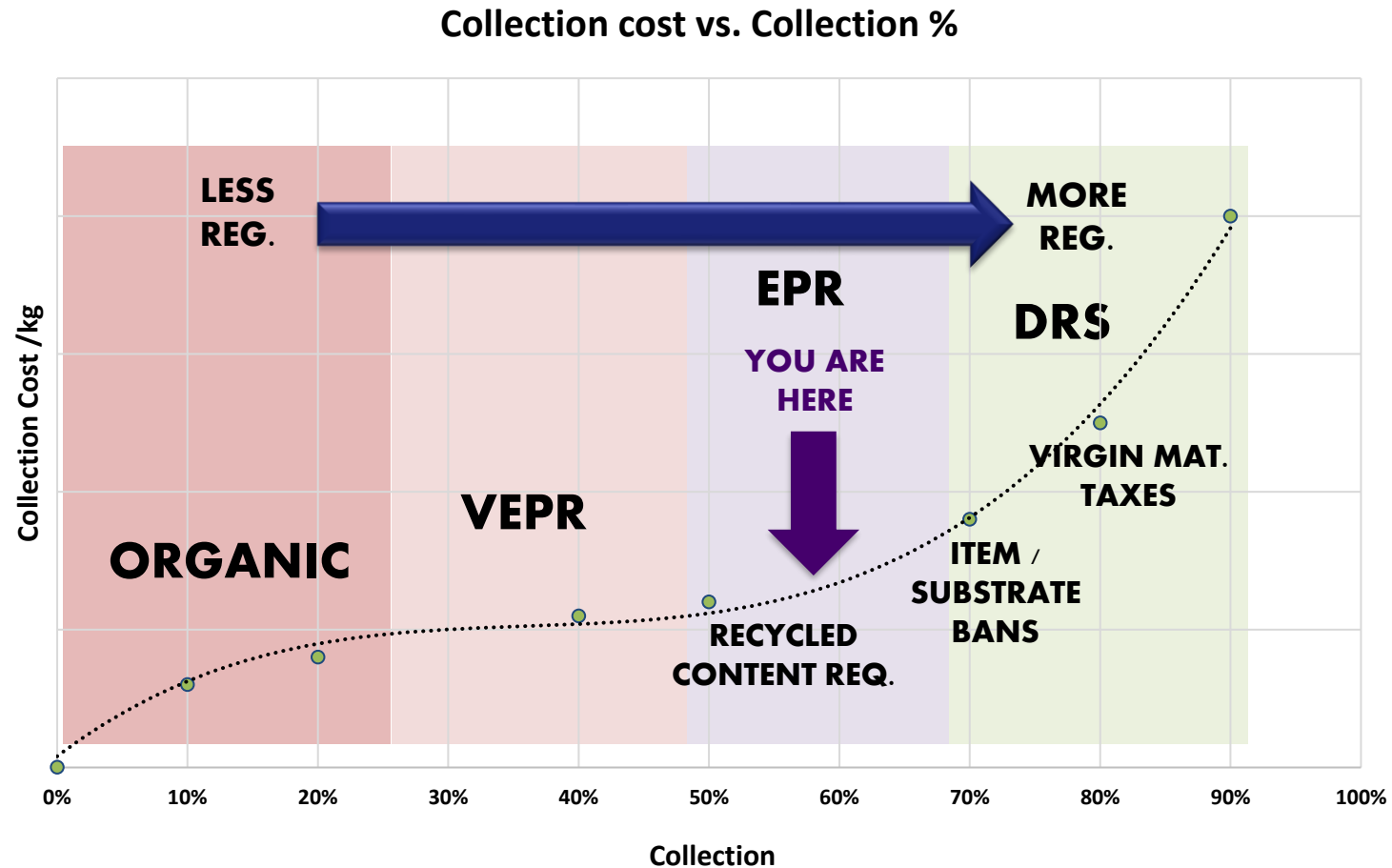


Fiscal instruments





EPR and increasing regulations

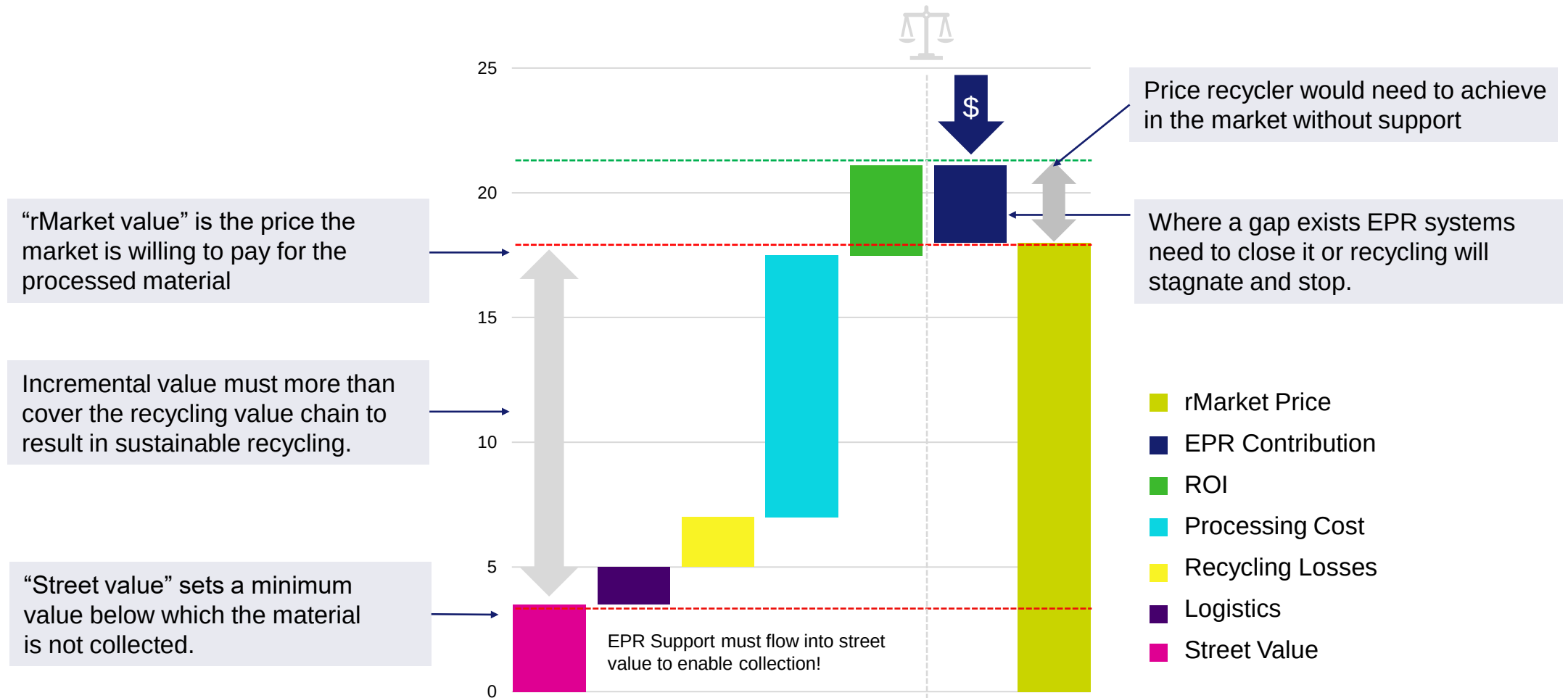




EPR fee considerations



Closing the Gap



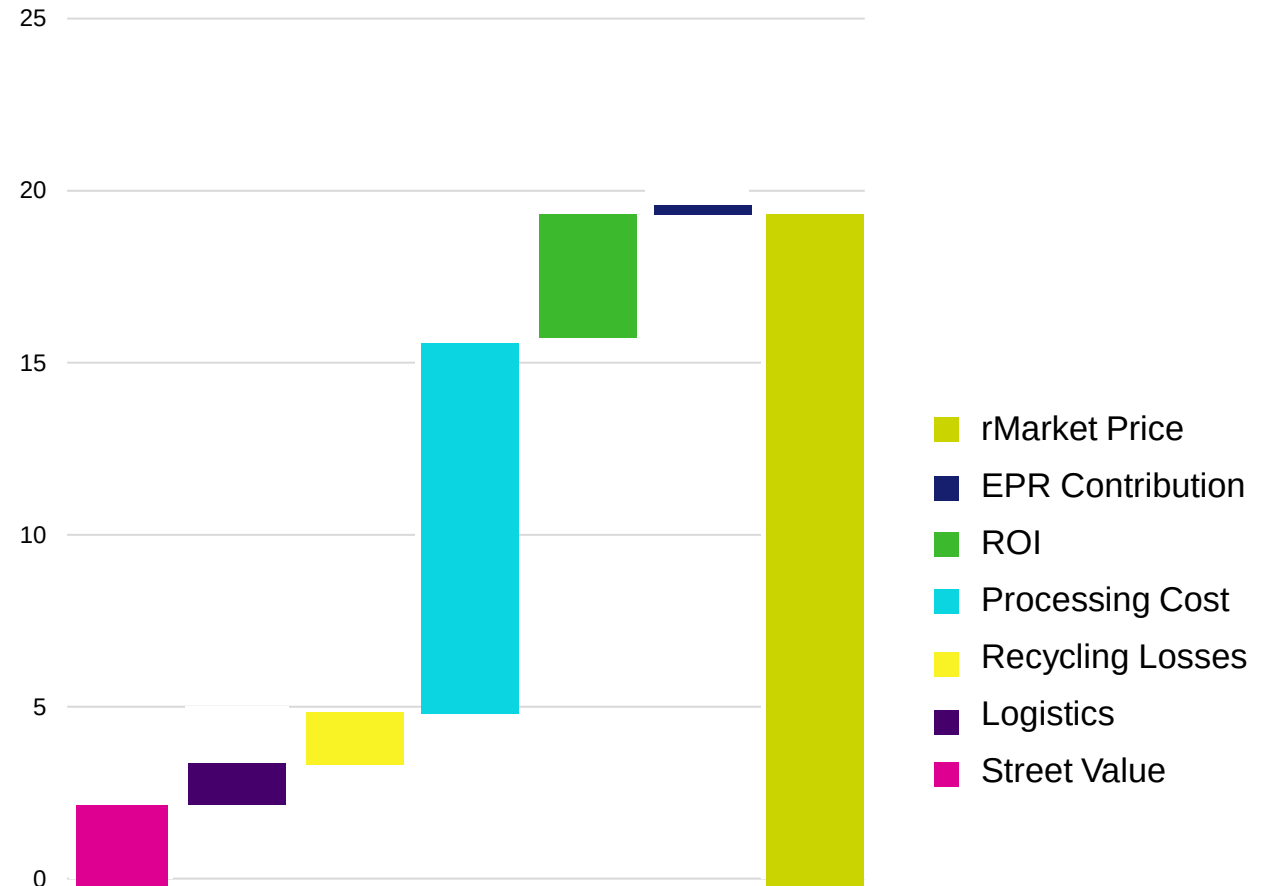


Closing the Gap

As targeted collection and recycling rate increases, value chain/economics change

Step 1: Organic Recycling

- No EPR support
- Materials with value are recycled at low levels





Closing the Gap

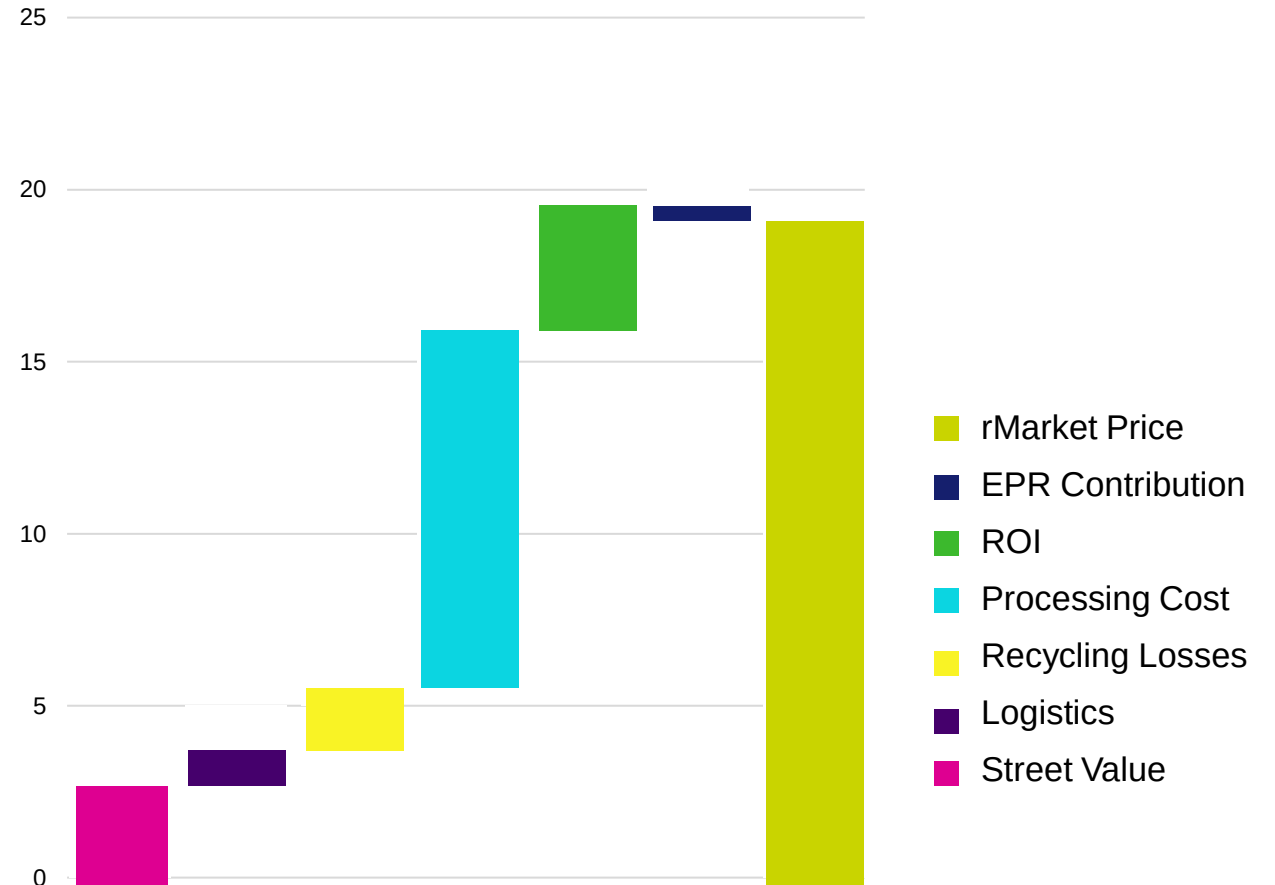
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Step 1: Organic Recycling

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Step 2: Increase the street value

- Introduction of EPR based support
- Increasing street value increases collection





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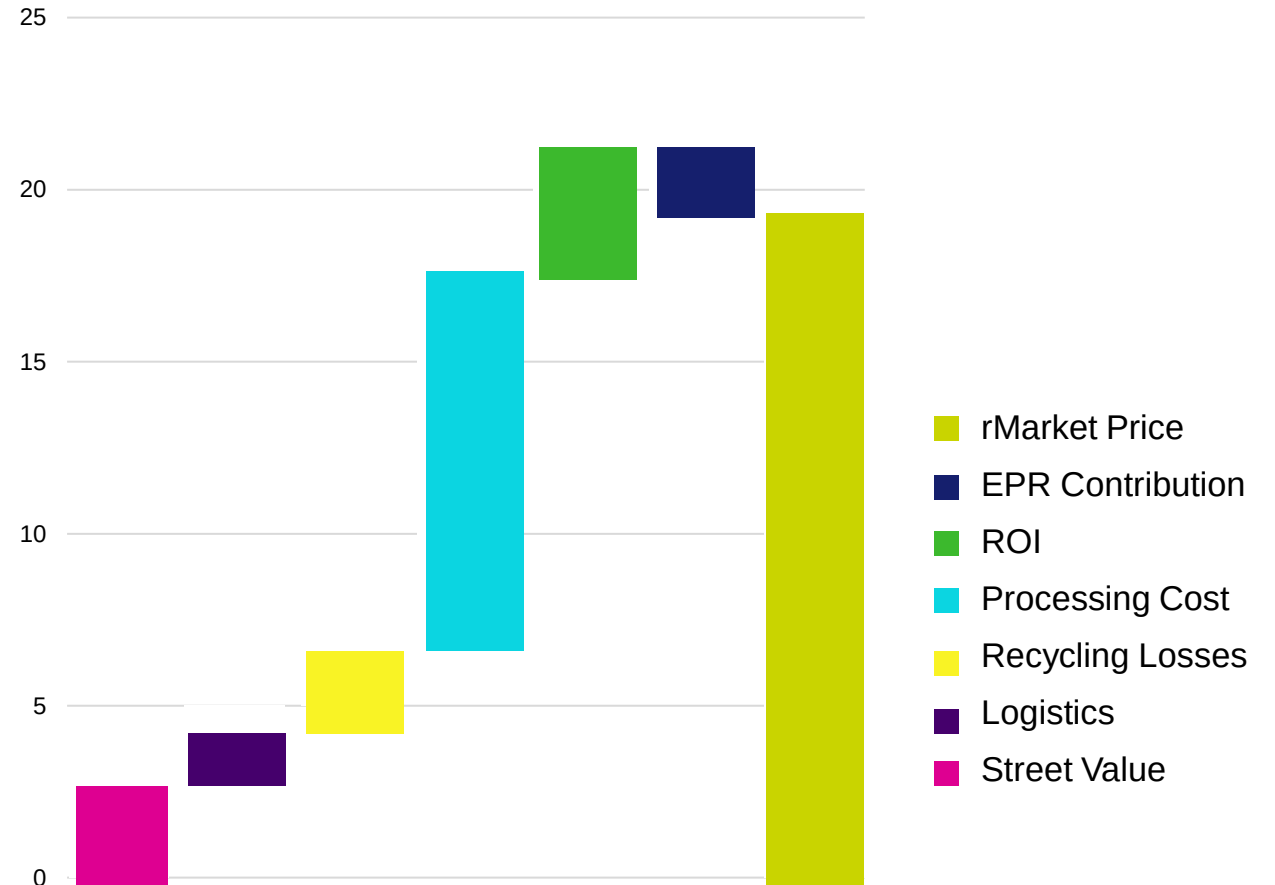
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Step 3: Broaden Collection

- Collection from a larger geography
- Increased support required to offset logistics





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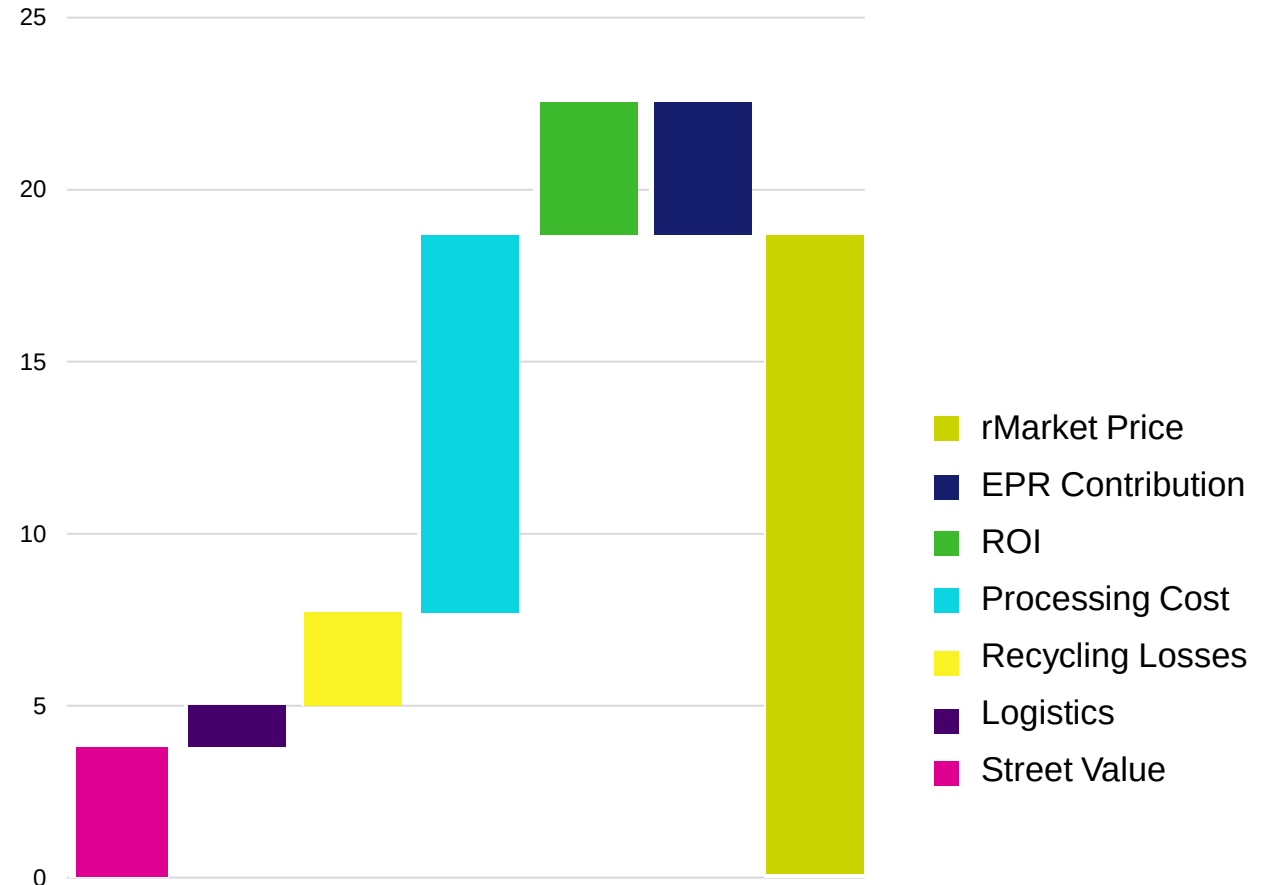
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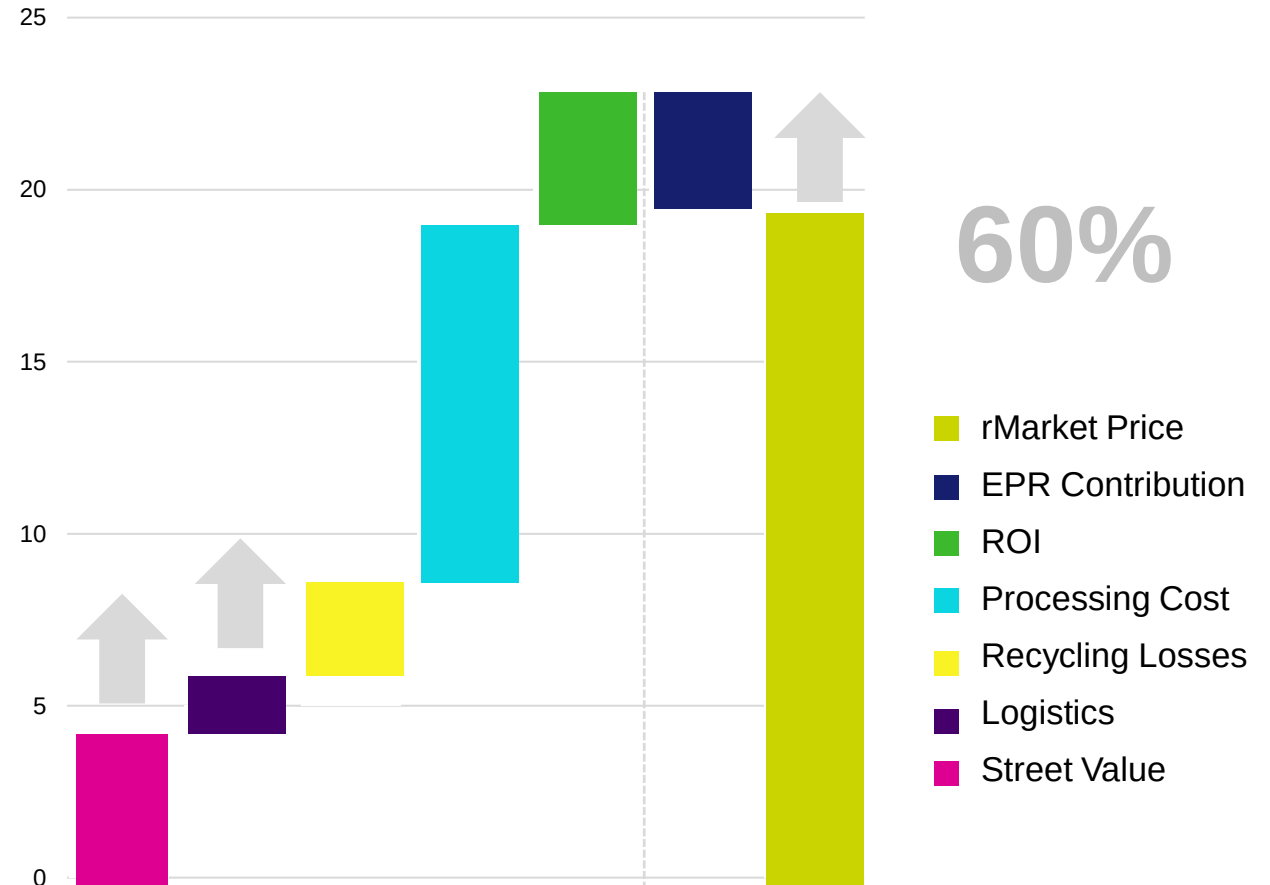
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Step 5: Increased rMaterial value

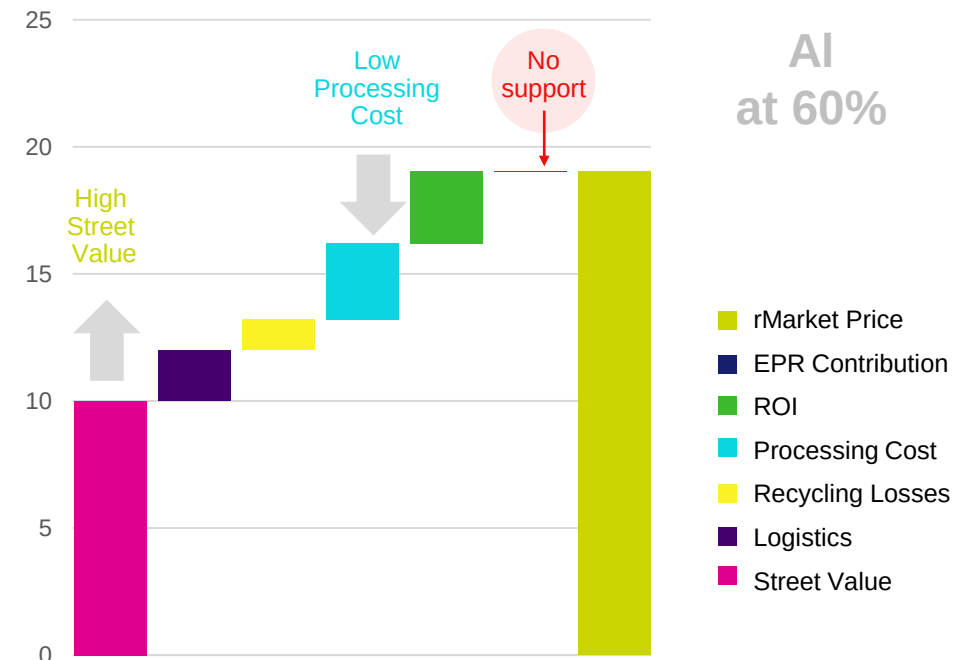
- Demand / legislation increases PCR value
- Higher street value without increased support





Closing the Gap

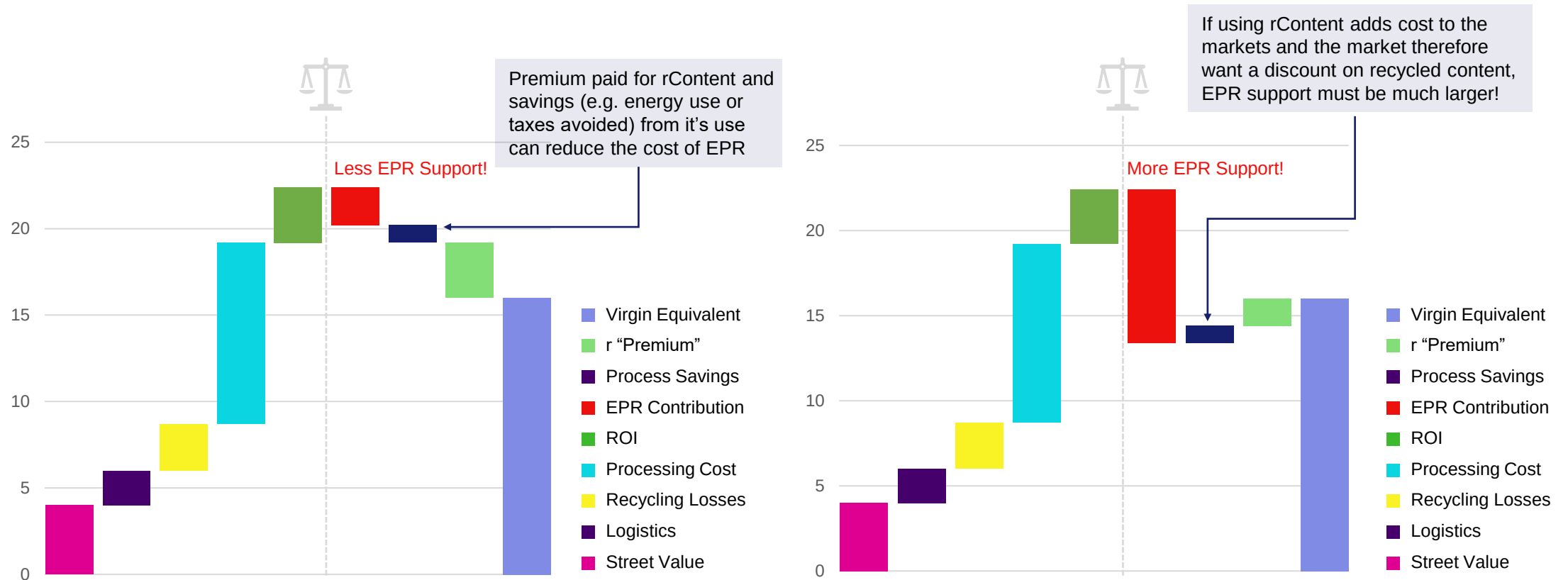
Value chains for competing materials can vary significantly!





Varying models for Support

EPR support required varies considerably based on the value of the end product

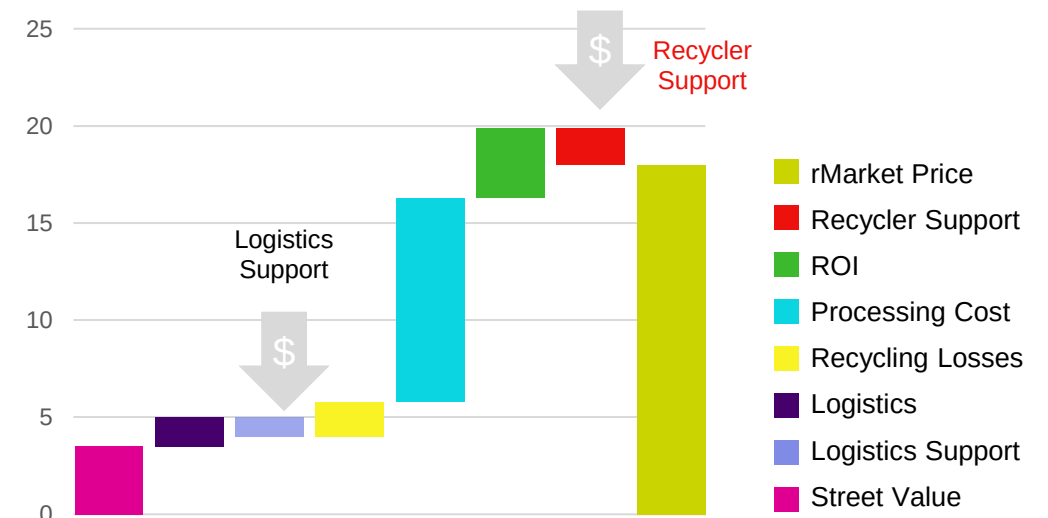
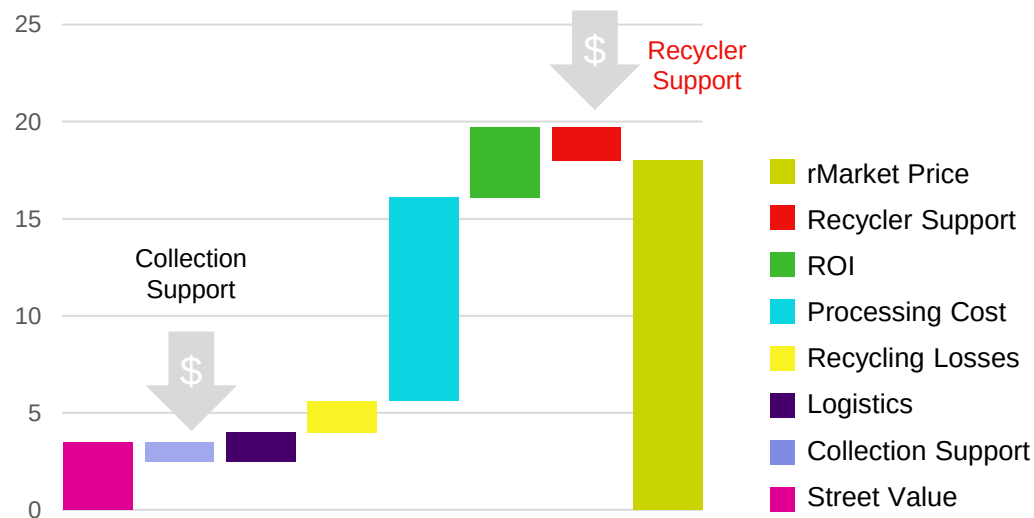




Varying models for EPR support

EPR support can vary greatly in terms of where and how it supports the value chain

- **Collection Support:** Applicable both to formal and informal channels to increase supply of PCR material without increasing the cost to the recycler.
- **Logistics Support:** Where transport of material to recycler is cost prohibitive, logistics support can enable collection and recycling from areas further from primary recyclers or end use markets.
- **Recycler Support:** Aims to close the gap between market pricing and required price for sustainable ROI.
- **Non-EPR Support:** Other non-EPR measures include government backed “green” incentives (E.g. lower taxes) and mandated recycled content targets to increase demand for which ultimately positively influence “rMarket Price”.





Varying models for EPR support

Packaging material choices must consider end-of-life and disposal costs

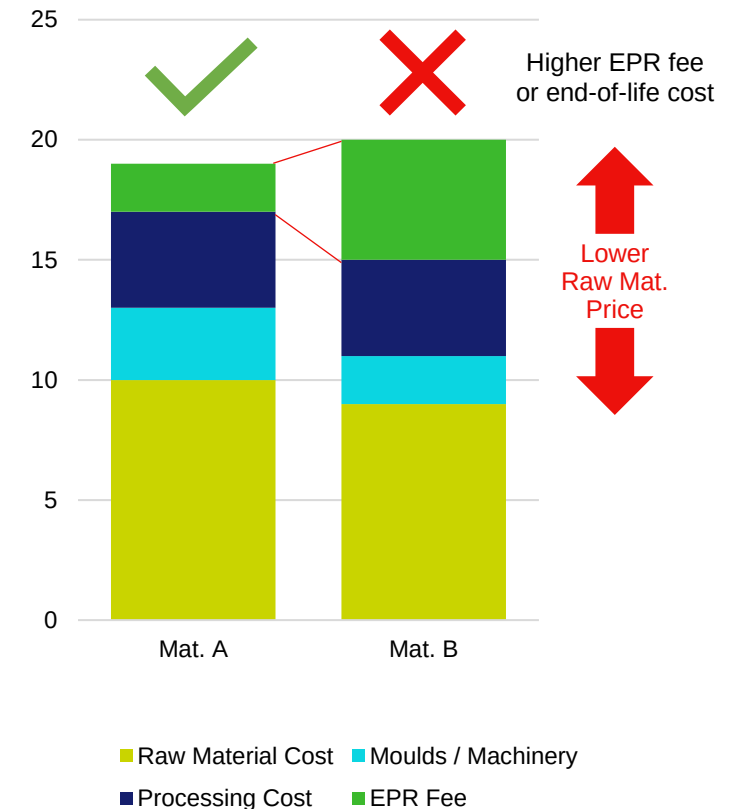
ECO-MODULATION: Approach that the full cost of any material should be considered and priced to the consumer of the material.

These costs include:

- Upstream costs
- Processing costs
- Downstream costs

END-OF-LIFE COSTS: Costs for the safe recycling or disposal of materials are seldom included unless applied by governments in a form of tax (e.g. carbon tax or plastic tax). The more difficult a material is to recycle or re-use the higher the end-of-life processing cost and EPR fee applied.

TOTAL COST: Under ideal conditions, with correct allocation of ECO-MODULATION fees, materials that are difficult to recycle will become too expensive to use.



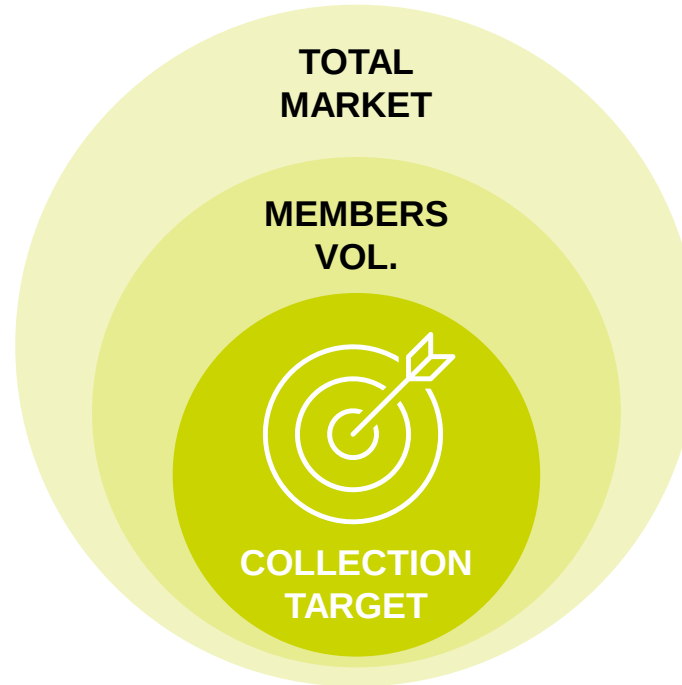
Unpacking the Petco model



New EPR Scheme Calculations

EPR Fee Calculation

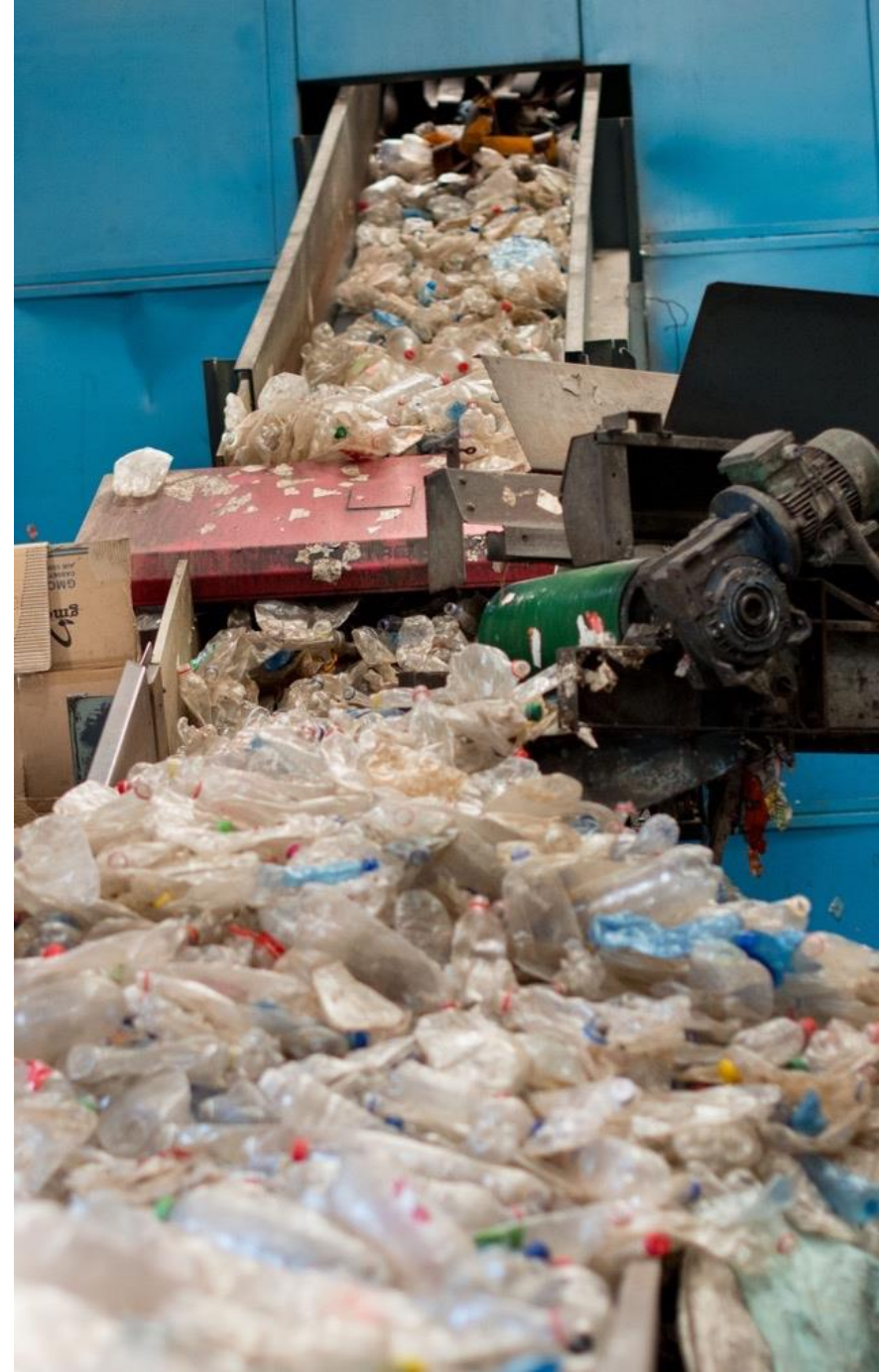
- EPR funding is largely determined by collection target
- Higher collection increases quantum of funding req.
- Collection target is expressed as % of members vol.
- Higher membership = higher targets = more funding
- Funding is thus dependent on final membership



$$\text{Collection Target} = \text{EPR Target \%} * \text{Members Volume}$$

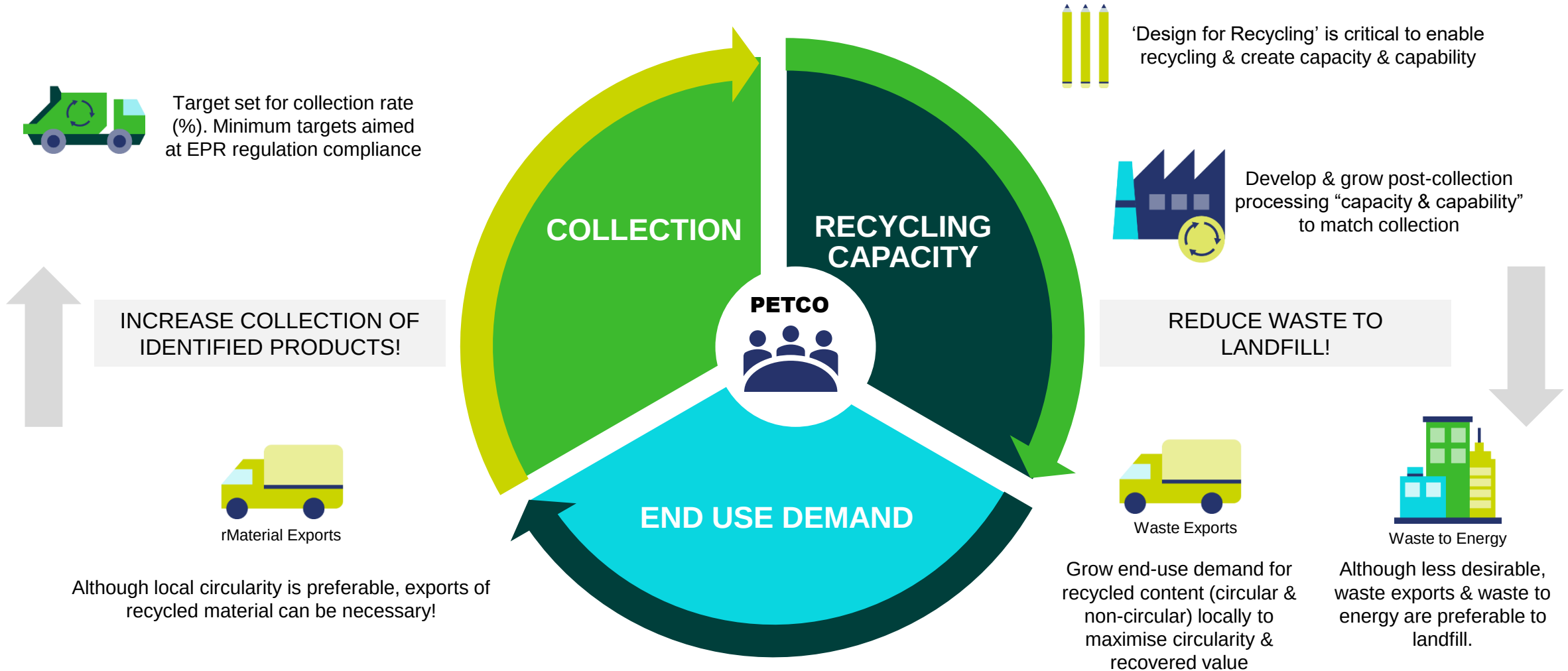


Understanding what members place in the market is critical to determining the job to be done, i.e. the collection target and the cost !





Balancing the value chain critical to EPR success





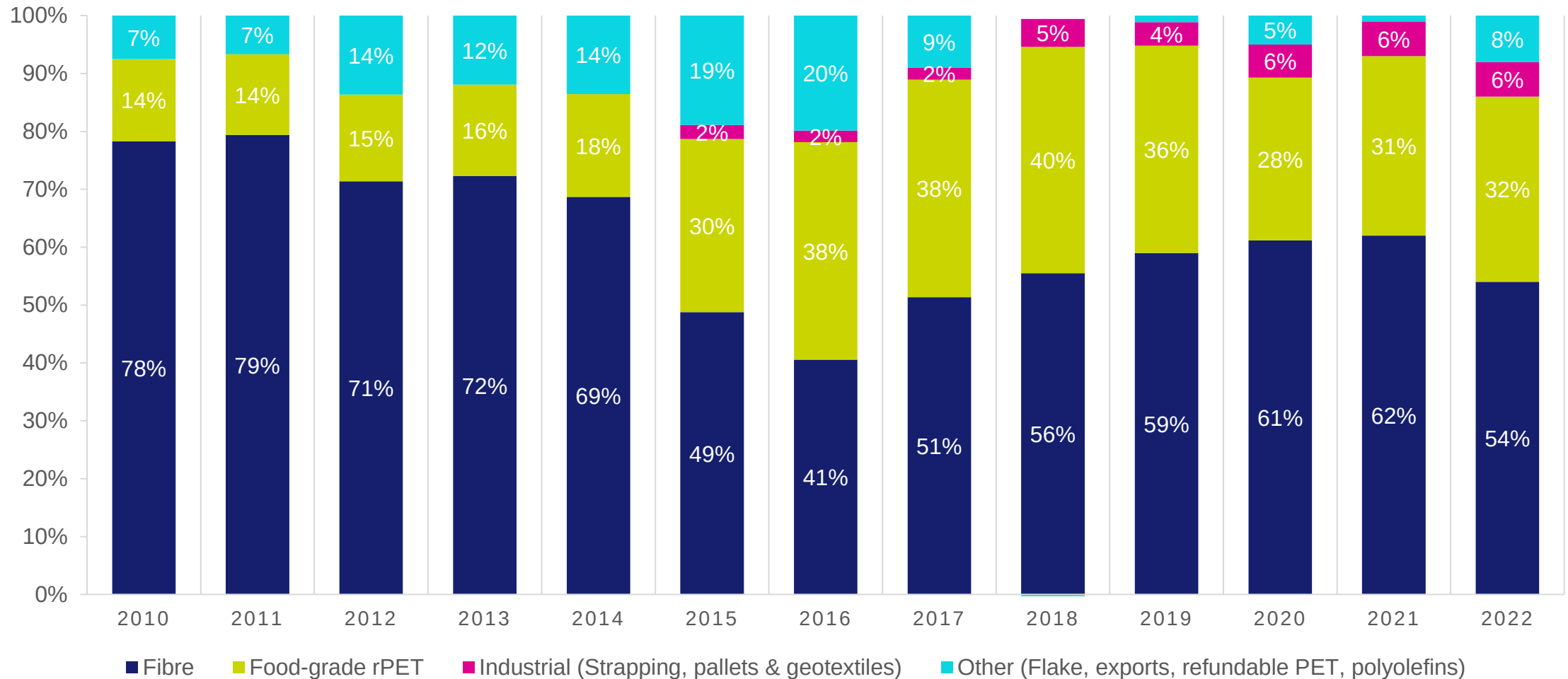
Expenditure of EPR fees

- 1 Education & Awareness**
Used to promote participation by all stakeholders in the recycling value chain including sorting by consumers.
- 2 WP Service Fee**
Payments are made per R/kg to WP based on recyclables sold within system.
- 3 Enterprise Development**
Infrastructure & equipment
Training & capacity development
Logistics support
- 4 Purchase Assistance Fee**
Allocated to contracted recyclers to support prices paid to value chain and offer support to recyclers against fluctuating market dynamics.
- 5 Finished Goods Support**
Allocated to contracted recyclers to ensure the price for rMAT is competitive vs. alternatives.



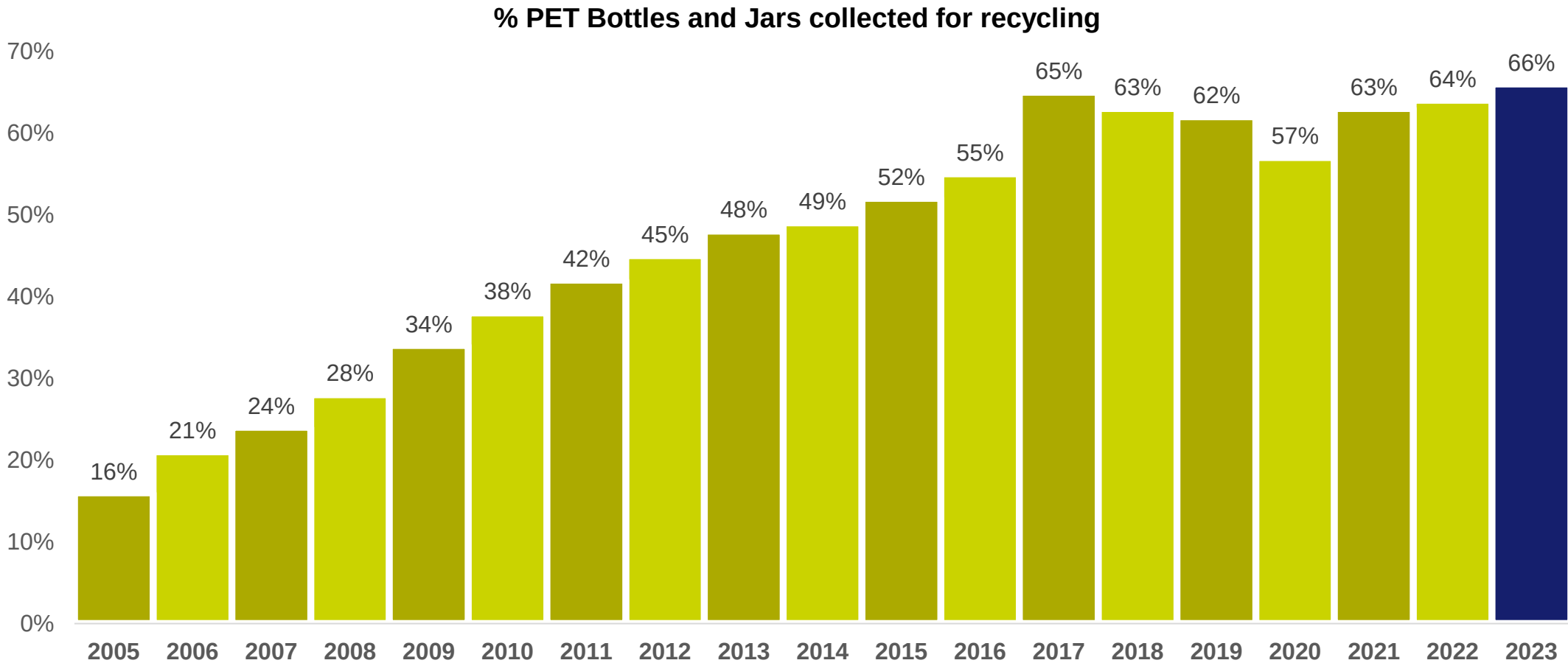


Increase in the proportion of recycled material going toward food-grade rPET





Growth in PET bottles and jars collection



A large pile of discarded milk cartons and cardboard boxes, illustrating waste. The cartons are from various brands like Long Life, Tetra Pak, and Almond Breeze. Some are still sealed, while others are open or crushed. The background is a dense, chaotic stack of this waste.

DFFE EPR guidelines: Current status



Update on DFFE EPR fee guidelines



DRAFT EXTENDED PRODUCER RESPONSIBILITY FEE DETERMINATION GUIDELINE

Industry consultation 8th September 2023



Structure of Draft EPR Fee Guideline document

Executive Summary

Definitions and Acronyms

1 Background

2 Introduction

2.1 Why was the guide developed?

2.2 Purpose of the guide

2.3 Who is the target audience as identified by section of the regulation?

3 Legislative framework and context for the EPR fees

3.1 Context

3.2 Key legislature that informs the determination of EPR fees

3.3 Cost recovery: a guiding principle for EPR fee determination in South Africa

4 EPR fee determination

4.1 Methods for EPR fee determination

4.2 Application of methods by sector.

4.3 Key criteria outlined in section 7 of the regulation

4.4 Other key considerations

5 Conditions for EPR Fee Adjustment

5.1 Allowance for increase

5.2 Adjustment options that fits in South African context

6 Toolkit and Addenda

6.1 Tools inventory

6.2 Addenda





Thank you

