

29 August 2016

FOR ATTENTION: MR ANBEN PILLAY  
DIRECTOR: WASTE POLICY AND INFORMATION MANAGEMENT DEPARTMENT OF  
ENVIRONMENTAL AFFAIRS

Dear Minister Bomo Edith Edna Molewa

**SECTION 28 NOTICE CALL FOR INDUSTRY WASTE MANAGEMENT PLANS – REQUEST FOR EXTENSION**

With reference to the Government Notice 915 in *Government Gazette* 40207 dated 12 August 2016 and to Packaging SA request for extension “Letter by Packaging SA” Polyoak Packaging (PTY) LTD supports the request by Packaging SA that the period of 3 months prescribed in section 3 (1) within which industry waste management plans must be submitted to the Minister be extended to at least 9 months (preferably 12 months).

Having worked closely with Packaging SA on both previous two voluntary Packaging and Paper Industry Waste Management Plans we believe a period of nine months is the absolute minimum period in which the necessary plan can be: drafted, circulated to stakeholders for comment, published for objections (which then all need to be addressed to an extent worthy of a proper plan) finalised, written up and submitted to the Minister.

Currently the South African Paper and Packaging Industry collectively support the collection rate of waste paper and packaging material in excess of 57%. This is done through voluntary environmental levies administered by the existing producer responsibility organisations (“PRO’s”) namely; PETCO, POLYCO, PSPC, Collect-a-Can, Glass Recycling Company and the Paper Recycling companies.

A hurried approach to the preparation and submission of a plan is not in the interest of government, society, the packaging industry nor the waste management and recycling industry. Furthermore a rushed submission will cast doubt on the content and achievability of such a plan.

As a member of POLYCO, PETCO and PSPC, Polyoak Packaging strongly believes that the plan submitted to government by the industry needs to build upon the existing infrastructure and work already being done. The plan needs to leverage off these existing facilities and organisations to ensure that the best economic outcome is achieved for both the environment (through increased

demand for recycle material) and society (through improved working environments and increase job opportunities).

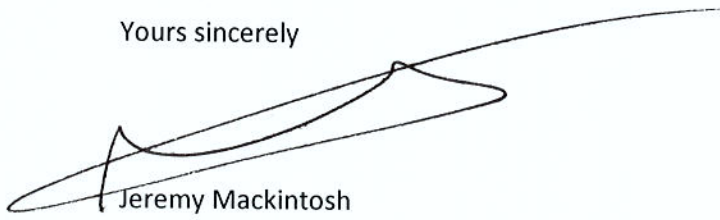
Consideration also has to be given to the fact that the plan cannot simply divert paper and packaging waste away from landfill and be seen as a success. For the plan to ultimately be a success the waste diverted needs to be reincorporated into the economy through fabrication (recycling, energy) and sold to a willing buyer to ensure that it does not end up an unwanted material that was costly to create. The plan needs to be a commercial success.

With the aid of the CSIR and research already underway Polyoak Packaging believes the industry can identify the relevant gaps and markets and through the PRO's can ensure that paper and packaging waste diverted from landfill ends up adding value to the South African economy from cradle to cradle.

A well thought-out, realistic, and achievable yet challenging plan is critical to ensuring the success of the plan itself as well as the success of government's desire in cleaning up the environment, creating new markets for recycled products and creating jobs.

Polyoak Packaging will continue to work closely with Packaging SA in the preparation and submission of an industry waste management plan and we trust that our request for an extension of time will be receive favourably and will take into account the necessary logistics required by government in preparing such a plan.

Yours sincerely



Jeremy Mackintosh  
Group Managing Director,  
Polyoak Packaging