

01 September 2016

To Whom it may concern

RE: Section 28 Call for Industry Waste Management Plans – Polyoak Packaging

On the 11 August 2016 the Minister of Environmental Affairs called for the submission of a Paper and Packaging Industry Waste Management Plan.

What is it?

The Paper and Packaging Industry Waste Management Plan (“PPIndWMP”) is a formal plan required by the government, to be submitted by the paper and packaging industry (collectively or individually), that makes the producers of paper and packaging material responsible for the end of life of that material.

More specifically it is a formal requirement for all paper and packaging producers to submit and outline a proposed roadmap and roll out of infrastructure/systems/processes etc with the aim of reducing waste to landfill, increasing recycling rates as well as generating social and economic benefits from paper and packaging waste¹.

How is it likely to affect you as our customer?

Under the government gazette the government has proposed the use of economic instruments to collect and administer an environmental levy that will fund the PPIndWMP.

Currently it is believed that an environmental tax is the most likely instrument to be used, the order of magnitude of the tax, however, is still unknown.

What is Polyoak Packaging doing?

- 1) Polyoak Packaging is already actively involved in the various requirements under the act including:

¹ Waste here is defined as post-consumer waste i.e. household waste and not factory or post industrial waste.

- a. Being subscribed to the Paper and Packaging Industry Waste Management Plan as written and proposed by Packaging South Africa (work in progress)
 - b. Being registered as a producer of packaging (registered date 25 August 2016)
- 2) Polyoak is a member in good standing of all the relevant producer responsibility organisations relevant to Polyoak Packaging, namely; POLYCO, PSPC & PETCO.
- a. Polyoak already pays the voluntary environmental levies charged by these organisations and has or has had active board representation on them as well.
- 3) Polyoak will continue to promote the lowest cost economic instrument and will challenge any cost implications not commensurate with a lowest cost approach.
- 4) Polyoak has requested an extension on the timing for the submission of the PPIndWMP along with Packaging SA.

What do you as our customer need to do?

- 1) If you are buying your packaging material from Polyoak (excluding preforms, see below) then you need not do anything at this point as the onus is on the producer of packaging to submit the plan and adhere to the government regulations.
 - a. We do however recommend that you [visit our website](#) regularly for updates as well as visit [Packaging SA](#) and [Plastics SA](#) websites for further information regarding the IndWMP to be submitted and how this may affect you.
- 2) In the event that you are importing “goods wrapped in primary or secondary packaging material” you will have to register as a producer of packaging material under the definition within the gazette notification.
 - a. We suggest that should this be the case that you register with the government (Below is a link to the registration form on our Polyoak Website)
- 3) Currently **Preform’s** are under query as to whether or not they will be defined as being packaging as sold to our customers or raw material to be used to produce packaging by our customers.
 - a. In order to ensure that our preform customers are protected, should the latter definition be ruled, we recommend that they have in place the necessary producer registration documentation to be sent to government.

Link to all documents <http://www.polyoakpackaging.co.za/Pages/Go-Green.aspx>

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Le Roux', with a large, sweeping flourish at the end.

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