



13th April 2018

TARGETS FOR DIVERTING WASTE TYRES FROM LANDFILL SITES

1. Background

A recent study into the development of waste legislation reveals that South Africa has been going through four stages over the past *three* decades. The first phase termed “The Age of Landfilling” is a period starting in 1989 and from which South Africa has not yet emerged. The second stage is “The Emergence of Recycling”, which started in 2001 with the publication of the Polokwane Declaration and the lead up to the banning of single-use plastic bags. A waste recycling economy has emerged in South Africa since then, but as the last official waste statistics show, the country has only been able to divert 10 per cent of the waste generated away from landfill sites towards recycling.¹ It seems that the most significant achievements in the recycling industry is in the recycling of plastics where 19.7 per cent were recycled in 2015, and the sector registered an annual recycling growth rate of *three* per cent for plastics.² The third stage, is “The Flood of Regulation”, a period starting in 2008 with the promulgation of the NEM: Waste Act (Act 59 of 2008), thereby giving rise to a wave of new waste legislation and regulations aimed at largely controlling the waste and secondary resources sector. The fourth and final stage, is “The Drive for EPR”, which started in 2012 with the publication of the Integrated Industry Waste Tyre Management Plan (IIWTMP). It suffices to state that the IIWTMP, managed by a Producer Responsibility Organisation (PRO), was aimed at fulfilling tyre producers’ responsibilities for end-of-life waste tyres, through a mandatory Extended Producer Responsibility (EPR) scheme.³

The promulgation of the Waste Tyre Plan in 2012 marked the start of mandatory EPR in South Africa. This gave rise to the creation of the Recycling and Economic Development Initiative of South Africa (REDISA), which formally started out in July 2013 with lofty goals. The Department of Environmental Affairs wanted it to be an example of how to create jobs (10 000 of them) while solving an environmental problem. Indeed, South Africa seemed to have a working example of how to turn waste into jobs and money, for a moment, as REDISA was the runner-up in the World

¹ Godfrey, L. and Oelofse, S. (2017) Historical Review of Waste Management and Recycling in South Africa. Resources **2017**, 6, 57; doi:10.3390/resources6040057

² Hanekom, A. (2017) The South African Plastics Recycling Industry – Progress. Waste Management Colloquium. Parliament of the RSA, Cape Town.

³ Godfrey, L. and Oelofse, S. (2017) Historical Review of Waste Management and Recycling in South Africa. Resources **2017**, 6, 57; doi:10.3390/resources6040057



Economic Forum’s Circular Economy Awards in 2015.⁴ REDISA proposed a system in which waste pickers would collect the 30-million waste tyres, rather than leave them lying around, be burnt or placed back on vehicles, as was generally the case. The pickers would take these waste tyres to collection depots, which would then be transported to central processing plants, where most of the rubber would be shredded and used for road surfaces or spongy matting in playgrounds. The rest would be burnt in kilns to provide energy for cement plants and so forth. This waste tyre reuse, recycle or recovery operation would be funded by a levy of R2.30 on each kilogramme of tyre sold, consistent with “the polluter pays principle” that the country pursues. In a short space of time, REDISA built 22 tyre collection centres and employed more than 3 000 people, using the R500-million a year levy generated. The idea was that the tyre recycling scheme could be turned into a blueprint for the 37 other waste streams that need to be recycled in order for the government to meet its 2022 target of recycling 100 per cent of waste. What is most important about this REDISA model is that it did not cost the fiscus anything.⁵

However, this waste tyre EPR scheme, which was managed by REDISA as a Producer Responsibility Organisation had been plagued by concerns from government, labour and civil society over the past five years. Consequently, government gazetted legislation that shifted the EPR “fee”, previously collected by the PRO, to an EPR “tax”, which is now paid by producers directly to government, further calling for additional waste tyre industry waste management plans or the EPR schemes.⁶

2. Diversion of waste tyres from landfill sites

- Waste tyre targets were set as follows in the *Department’s 2013/14 Annual Report*: 2014 - 59 000; 2015 - 90 000; 2016 - 120 000; and 2017 - 175 000.
- In the *2014/15 Annual Report of the Department*, the target was to reuse, recycle and recover 10 per cent of waste tyres. However, 25 per cent of waste tyres were recycled, reused for energy or recovered, meaning that 25 per cent of waste tyres were diverted from landfill sites in that reporting year.

⁴ King, S. (2017) Tyre recycling scheme hits the skids [Internet]. Available from <<https://mg.co.za/article/2017-06-09-00-tyre-recycling-scheme-hits-the-skids>> (Accessed on 12th April 2018).

⁵ Ibid.

⁶ Godfrey, L. and Oelofse, S. (2017) Historical Review of Waste Management and Recycling in South Africa. Resources **2017**, 6, 57; doi:10.3390/resources6040057



- In the *2015/16 Annual Report of the Department*, it was indicated that the plan was to divert 25 per cent of waste tyres from landfill sites. However, 42 per cent (72 052/172 441) of waste tyres were diverted from the landfill sites, thereby exceeding the planned target with a variance of 68 per cent.
- In the Minister's foreword to the *2016/17 Annual Performance Plan* (APP), it was stated that "Through the Department's Waste Tyre Management Plan, 31 per cent of waste tyres have been diverted from landfill for re-use, recycling and recovery purposes. Approximately 3 000 jobs and 200 Small Medium and Micro Enterprises and Cooperatives have been established through the implementation of this plan".
 - The same information (above) is repeated in the foreword to the *2017/18 Annual Performance Plan* (APP), but there was no target for waste tyre diversion from landfill sites.
- It is stated in the *Estimates of National Expenditure (2018 Budget)* that one of the objectives of the *Waste and Chemicals Programme* is to "increase the percentage of waste tyres diverted from landfill sites from 60 per cent in 2017/18 to 100 per cent by March 2021."
- In the *Department's 2018/19 Annual Performance Plan*, the target is to divert 30 per cent of waste tyres away from landfill sites.
- In the Parliamentary Colloquium on the Waste Economy held on 14th March 2017, Mr Hermann Erdmann, the CEO of REDISA presented that in 3½ years, the proportion of waste tyres diverted from landfill sites went from *four* per cent to 63 per cent, which he expected to reach 100 per cent diversion at the end of the *fifth* year. He further stated that over 3 000 jobs were created and over 200 small businesses were created, with a net positive impact on the country's GDP.