

CIRCULAR 06 / 2020

FROM : CHIEF EXECUTIVE OFFICER
TO : MUNICIPAL MANAGERS
DATE : 20 FEBRUARY 2020

**REQUEST FOR INPUTS ON THE DRAFT NATIONAL WASTE
MANAGEMENT STRATEGY**

1. OBJECTIVE

The objective of this circular is to request municipal inputs on the National Waste Management Strategy published for public comments on 13 December 2019.

2. BACKGROUND

On 13 December 2019, the Department of Environment, Forestry and Fisheries (DEFF) published the draft National Waste Management Strategy for public comments with a deadline for submitting inputs by 03 February 2020. SALGA wrote to DEFF requesting an extension of the date of submissions in order to provide sufficient time to consult municipalities. An extension was granted for all sector stakeholders until the 28 February 2020.

SALGA participated in the process of developing the strategy, prior to its publication. Some of SALGA inputs are already incorporated in the draft strategy, however, others were not addressed.

3. SALGA REVIEW OF THE DRAFT NATIONAL WASTE MANAGEMENT STRATEGY

SALGA has reviewed the published draft strategy document, and prepared some initial comments outlined below.

3.1 Policy certainty on the future of landfill sites

It is a common knowledge that South Africa is experiencing severe constraints in relation to the availability of landfill airspace. It is also understood that commissioning and operating new landfill sites is costly to municipalities and often resisted by communities neighbouring potential new landfill sites. The government's ambition is to have a zero waste to landfill, through avoid, reduce, reuse, recycle, recover, treat and dispose, but the current lack of uptake of alternative methods means landfills will still be used for the foreseeable future.

In its current form, the draft strategy is silent on the future of landfill sites except the mentioning of a need for landfill sites to have Material Recover Facilities (MRF). A MRF is a processing facility where recyclable materials are sorted and prepared for sale or transfer to end users such as manufacturers or recyclers for additional processing. Locating a MRF at landfill sites can only mean that the type of waste that will be handled at the facility will be a mixed waste from municipal trucks. This approach has been widely proven that it does not add value in recycling because the quality of recyclable materials separated from municipal trucks has a very low value due to contamination by other liquid waste.

It is therefore recommended that the Department should provide a clear policy direction on infrastructure solution for managing waste in the country (i.e. facilities for turning waste into energy, landfills etc.). On MRFs, these facilities are a very important aspect of waste management value chain, however they should be strategically located and serviced by the clean materials which are separated at the source. For the strategy to link these facilities with landfill sites can be problematic as it may affect their viability. Municipalities and recycling industries must be allowed to collaborate on the establishment of these facilities.

3.2 Regional Planning for waste management infrastructure

Section 5.1 of the strategy is encouraging a regional planning of waste management infrastructure. This is a positive step towards the right direction. SALGA supports this approach to the provision of waste services, however, a careful consideration must be exercised when it comes to the implementation.

It is important to note that the biggest cost driver for waste management service is logistics, therefore a regional waste management infrastructure approach has to consider the distance at which each municipality will travel to the facility. Notwithstanding the above, this approach is important for the following reasons:

- Sharing of skills, expertise and capability at regional or district Level.
- Alleviating service delivery backlog
- Develop common indication rather than have each Local Municipality develop their own Waste Infrastructure which is hardly used in its entirety.
- Reduce the Capital and Operating Cost, which are too high for each Local Municipality

3.3 Provision of recycling drop-off/buyback/storage centers

The strategy indicates that DEFF will engage National Treasury in relation to make financial provision for these facilities. This is appreciated, however, there are no mechanisms provided to transport recyclable materials that would have been separated from households to these facilities.

SALGA in collaboration with the Finance and Fiscal Commission has conducted a study to determine the cost of providing waste management services and the outcome showed a huge disparities on what has been allocated to municipalities to provide this service to each household. So, it will be logistically and financially problematic to expect municipalities to operate a two way collection system, one for the source separated recyclables and the other one for residual waste.

It is understood that DEFF has identified certain industries (i.e. Paper and Packaging etc.) for implementation of Extended Producer Responsibility (EPR), as the Minister has been empowered in terms of Section 18 and 28 of the Waste Act (Act No. 59 of 2008). It is believed that this is a good decision that has a potential to offer some relief to

municipalities in relation to the management of these waste types. It is recommended that the strategy should make reference to the recycling industry funding separation at source operations and required infrastructure through levies that will be generated from the EPR process.

3.4 80% of Integrated Waste Management Plan (IWMP) is reflected in municipal budgets

The strategy has a target of having 80% of IWMP reflected in municipal budget. It is important to note that municipal budgets are determined based on the outcomes of IDP process, which involves a lot of consultation with communities on their needs. For the strategy to pronounce on the percentage of IWMP implementation without a base may be problematic to most of municipalities especially small and rural ones.

It is recommended that the strategy should prioritise support to municipalities to develop credible and realistic IWMPs, then implementation be in a staggering approach where different categories of municipalities and their capacity is considered.

3.5 Introduction of landfill tax to support compliance and monitoring

In ensuring that municipal landfill sites and other facilities are complying, the strategy is advocating for the introduction of a landfill tax and policy recommendations to be made by 2020. A landfill tax is a form of tax that is imposed on landfills or other disposal facilities with the purpose of reducing the amount of waste disposed at landfill sites. These funds are meant for inspection programs or long-term mitigation of environmental impacts related to disposal.

It is important to note that Landfill taxes require measurement and reporting on all qualifying waste to landfill and South African landfills do not currently have adequate systems in place to do this (i.e. very few have functional weighbridges, etc.). An increase in the cost of landfilling as a result of a landfill tax may have unintended consequences such as illegal dumping or increase in disposal at unregulated landfills. This would have a worse environmental outcome than before.

Furthermore, municipal finances will be negatively impacted by a landfill tax as they will have to pay a new charge that may not be recoverable from customers. It is therefore

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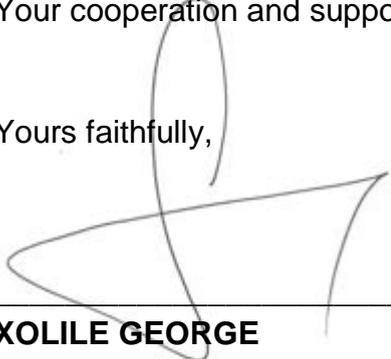


believed that it is still early to consider landfill tax as a mechanism to alter behavior in a country like South Africa. There are many other mechanisms for reducing environmental impacts of waste to landfill such as raising awareness to avoid waste generation, where it cannot altogether be avoided, it be recycled or reused.

Please send your input to bnengovhela@salga.org.za or Jmashele@salga.org.za by 27 February 2019.

Your cooperation and support will be greatly valued.

Yours faithfully,



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CHIEF EXECUTIVE OFFICER