

The EPR Regulations were published by the Department of Forestry, Fisheries and the Environment (DFFE) and were gazetted on 5 May 2021. Producers had six months to register with the DFFE. The regulations became effective from 5 November 2021. In terms of the regulations, it is mandatory for a Producer to join (become a member of) an approved EPR Scheme / Producer Responsibility Organisation (PRO). Alternately, a Producer can set up their own scheme, which will require DFFE accreditation. Initially there will be a separate PRO for each of the material streams.

As set out in the regulations, there are many obligations that must be met by an EPR scheme/PRO on behalf of its producer members. Importantly this will include determining a mandatory EPR fee for each of the paper and packaging materials placed on the South African market. The fee will fund the scheme's objectives, including annual minimum recycling targets, life cycle assessments, waste pickers obligations and a transformation charter.

Companies that are included in the definition of Producer will be required to join an EPR Scheme/PRO for each paper and packaging material substrate.

The Glass Recycling Company (TGRC), of which Ardagh Glass Packaging is a member, in its present form is a voluntary EPR Scheme/PRO for glass packaging that was established by South African glass manufacturers and brand owners in 2005. Together with the TGRC, Ardagh has developed an EPR Glass Scheme as per the regulations which came into effect from 5 November 2021.

TGRC's current activities include building infrastructure and capacity for the collection and processing of waste glass (known as cullet), glass recycling marketing and education. To date, this joint initiative by all role players and the TGRC has been very successful in increasing the recycling of glass. Over the past 15 years South Africa has increased its glass collection recycling rate from 18% in 2006 to 44% in 2020. However, there is much more to do to meet the new five-year collection target of 65%.

We believe that TGRC, compliant with the EPR regulations, is well placed to establish an EPR Glass Scheme and become a fully compliant PRO.

* References:

- https://www.environment.gov.za/event/deptactivity/extendedproducerresponsibility_regulations2020registration#introduction
- https://www.environment.gov.za/amendment_regulations
- <https://www.cbn.co.za/featured/epr-is-coming-will-you-be-ready/>