

MetPac-SA NPC (2017/216419/08)



# Driving Sustainable Metal Packaging

January - December 2023

EPR SCHEME:  
Year 2 Annual Report





## Disclaimer

This report has been compiled to comply with the requirements of the Extended Producer Responsibility (EPR) Regulations published in Government Gazette No. 44539 on 5 May 2021 in terms of Section 18 of the National Environmental Management Waste Act, 59 of 2008 (NEMWA), as amended.

This Year 2 EPR Annual Report has been developed with the list of members as per the January to December 2023 declarations received from MetPac-SA Members.

# Table of Contents

1	Introduction	6
2	Governance	7
2.1	Structure of MetPac-SA	7
2.2	Memorandum of Incorporation (MOI)	9
2.3	Metal Packaging Industry	9
2.4	MetPac-SA Membership	9
2.5	Transparency	11
2.6	Transformation	11
2.7	Job creation	12
2.7.1	MetPac-SA Staff	12
2.7.2	MetPac-SA Project Support Job Creation	12
3	DFFE Correspondence & Action Plan	13
4	MetPac-SA Year 2 Annual Financial Report	13
4.1	MetPac-SA's EPR Fees	13
4.2	Annual Financial Report	14
4.3	Targets	15
5	EPR Implementation	17
5.1	Sponsorships	17
5.2	Knowledge Sharing and Awareness	18
5.3	Plant The Seed	18
5.3	Strategic Partnerships	19
5.3.1	Empowering Communities and Entrepreneurs	19
5.3.2	Schools' Competition	20
5.3.3	Understanding The Recovery of Ferrous Steel Packaging	21
5.3.3.1	MetPac-SA Data Acquisition And Mapping Strategy	21
5.3.3.2	Waste Characterisation	25
5.3.4	Packa-Ching	26
5.3.5	Petco	26
5.3.6	Packaging Working Groups	28
5.4	Material Flow Analysis (MFA) For Used Beverage Cans	28
5.4	Data and Information	28
5.5.1	Export Data	29
5.5.2	Collection Data	30
5.6	Recycled Content	30
5.7	The PRO Alliance	31
5.7.1	Waste Picker Integration	32
5.7.2	Broad Based Black Economic Empowerment (B-BBEE)	33
5.7.3	EPR Fee Concurrence	33
5.7.4	Municipal Collaboration	34
5.7.5	Reporting Periods	34
6	Summary and Way Forward	34
	Annexure A: MetPac-SA Members – Year 2	35
	Annexure B: 2023 MFA for Aluminium Beverage Cans	36

## Figures

- Figure 1: MetPac-SA Board and organisation organogram as per the CIPC registration (2023)
- Figure 2: MetPac-SA membership representation for Year 2 (2023)
- Figure 3: Waste cage at Errol's recycling operation in Dunoon, Cape Town
- Figure 4: Map of South Africa and its buyback centres and re-melters (Source: R. Harichunder own image)
- Figure 5: Photos from the launch of a Packa-Ching unit in Stellenbosch
- Figure 6: Geo-spatial representation displays the locations of transactions as captured on Petco's BanQu trading system
- Figure 7: Geo-spatial representation displays the locations of transactions as captured on Petco's Lariat trading system

## Tables

- Table 1: Year2 Draft Financials for MetPac-SA (January 2023–December 2023)
- Table 2: Aluminium Tonnage and Targets – MetPac-SA Members for Year 2 – Jan–Dec 2023
- Table 3: Tinplate (ferrous) Metal Tonnage and Targets – MetPac-SA Members for Year 2 – Jan–Dec 2023
- Table 4: List of Buyback centres and re-melters/recyclers mapped in South Africa
- Table 5: Waste characterisation results over 4 months

## Abbreviations

AGM	Annual General Meeting
AMASA	Aerosol Manufacturers Association of South Africa
ARO	African Reclaimers Organisation
B-BBEE	Broad Based Black Economic Empowerment
CEO	Chief Executive Officer
DFFE	Department of Forestry, Fisheries and the Environment
DTIC	The Department of Trade, Industry and Competition
EPR	Extended Producer Responsibility
eWASA	EPR Waste Association of South Africa
IPSA	Institute of Packaging South Africa
ISO	International Organisation for Standardisation
ITAC	International Trade Administration Commission
MetPac-SA	The Metals Packaging Association of South Africa
MFA	Material Flow Analysis
MOI	Memorandum of Incorporation
MOU	Memorandum of Understanding
MRF	Material Recovery Facility
NDA	Non Disclosure Agreement
NEMWA	National Environmental Management Waste Act, 59 of 2008, as amended.
NPC	Non-Profit Company
PRO	Producer Responsibility Organisation
SALGA	South African Local Government Association
SAWPA	SA Waste Pickers Association
SAWPRS	South African Waste Picker Registration System
TGRC	The Glass Recycling Company
UBC	Used Beverage Cans



# 1 Introduction

The Metals Packaging Association of South Africa (MetPac-SA) is a registered Non-Profit Company as defined in Section 21 of the Companies Act No. 71 of 2008, registration number: 2017/216419/08.

MetPac-SA is a registered Producer Responsibility Organisation (PRO) with the Department of Forestry, Fisheries and the Environment (DFFE) (EPR Registration Number: 19/7/5/P/PRO/20210720/005) and has compiled an Extended Producer Responsibility (EPR) report in terms of the EPR Regulations published in Government Gazette No. 44539 on 5 May 2021 in terms of Section 18 of the National Environmental Management Waste Act, 59 of 2008 (NEMWA), as amended.

This report presents the annual performance report as required by the EPR Regulations in section 8(1)(b) including:

- audited performance against the published targets
- audited breakdown of the allocation of the extended producer responsibility fee; and
- audited performance on all finance matters.



# 2 Governance

MetPac-SA represents members from the metal packaging industry in South Africa, excluding aerosol packaging and 210 litre metal drums.

Our mission, as the PRO of choice for metal packaging in South Africa, is to establish the metal packaging industry as a valuable contributor to sustainable development principles, through effective investment in post-consumer metal packaging recovery and re-utilisation.

MetPac-SA aims to integrate the metal packaging value chain in South Africa, and to represent industry's views, in a unified voice, to all stakeholders.

MetPac-SA is presently engaged in the following performance areas:

- Execution of the MetPac-SA EPR plan
- Assist members with fulfilling their EPR obligations and encourage others to join as members of MetPac-SA
- Monitor the overall statistics related to members of MetPac-SA against the EPR targets and to:
  - Drive input material through the "design for recycling" principles; and
  - Ensure post-consumer metal packaging data and reporting integrity.
  - Support the circularity of metal packaging in South Africa.

## 2.1 Structure of MetPac-SA

MetPac-SA is a Non-Profit Company (NPC), as defined in Section 21 of the Companies Act No. 71 of 2008, with registration number 2017/216419/08.

MetPac-SA functions under the leadership of Kishan Singh (Chief Executive Officer and Director) and a Board of Directors representative of the members from industry consisting of:

- Mark Helfrich (Nestle), Chair
- Nozicelo Ngcobo (CCBA), Vice Chair
- Muhammed Darsot (Dursots)
- Roxanne Stegen (Hulamin)
- Karen-Dan Koen (Oceana)
- David Kramer (CCBA)
- Earl Chetty (Nampak)
- Don McFarlane (Woolworths)

In terms of MetPac-SA's Memorandum of Incorporation (MOI) the Board shall comprise of not less than 7 and not more than 11 Directors. A call for nominations was made at the 2023 AGM to fill the vacant seats.

One team member joined the MetPac-SA team in 2023:

- Dr Ravi Nadar as a Research Analyst

The organisation will continue to grow as EPR implementation continues, as appropriate. MetPac-SA plans to employ additional staff members as required to assist with managing project implementation, stakeholder engagement and reporting in the third year of EPR strategy implementation.

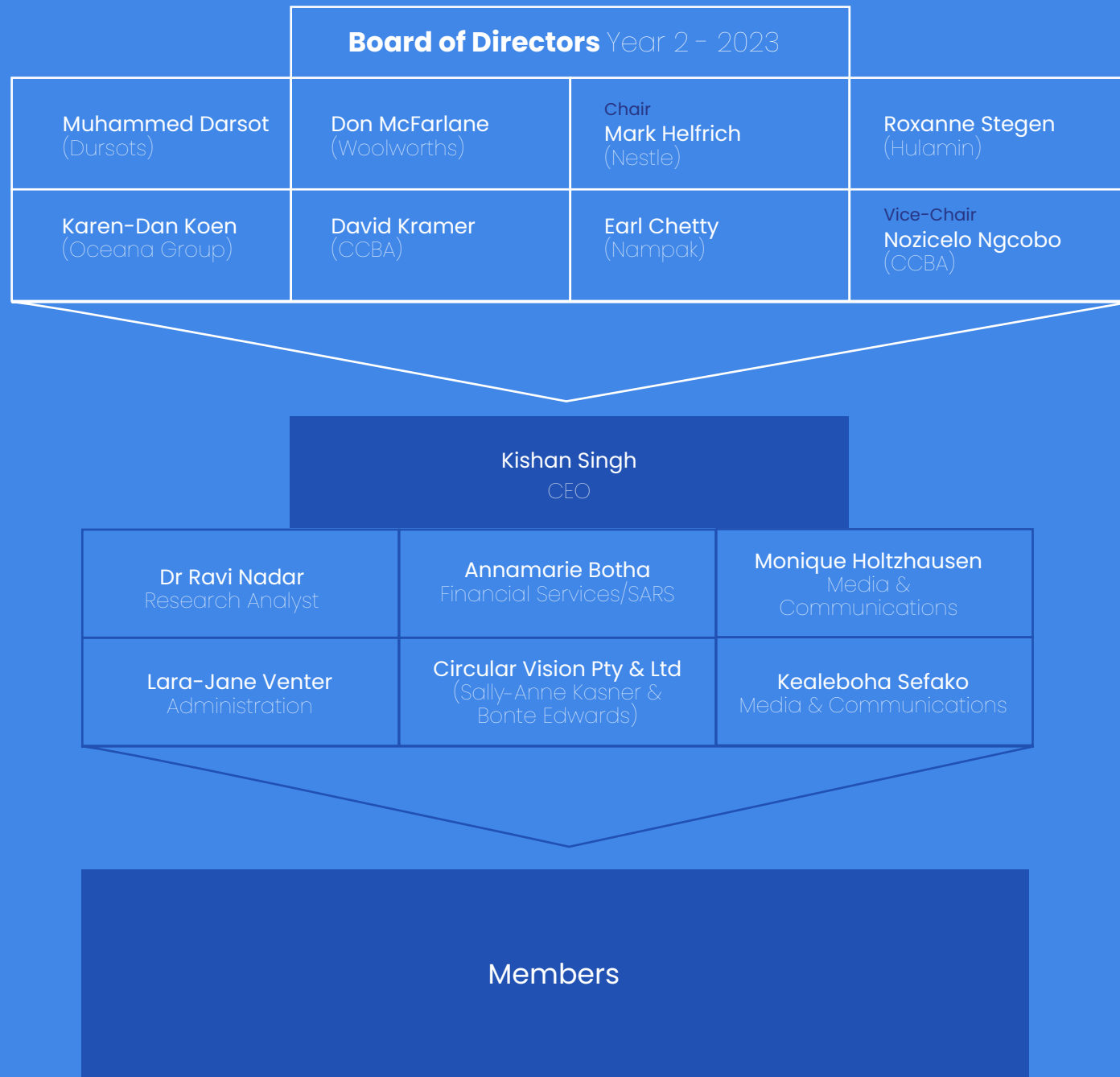


Figure 1: MetPac-SA Board and organisation organogram as per the CIPC registration (2023)



Additional resources are dependent on the concurrence of the proposed Year 2 EPR fees by both the DFFE and Treasury<sup>3</sup>. A further factor is the timely payment of EPR fees by members. Operational expectations / targets are dependent on condonation of the fees and prompt EPR fee payments.

## 2.2 Memorandum of Incorporation (MOI)

The Memorandum of Incorporation (MOI) has been revised to align with the requirements of the EPR regulations. The revised MOI was accepted at the Annual General Meeting (AGM) held on 31 August 2023 and in effect from 10 November 2023.

## 2.3 Metal Packaging Industry

The metal packaging industry can be divided into either local suppliers, producers, brand owners or importers. Aluminium packaging is imported and locally manufactured, and all Tinplate (ferrous) packaging is imported to South Africa as ArcelorMittal SA no longer supplies Tinplate (ferrous) packaging to the South African market.

Metal packaging is used for a variety of packaging types from drums, pails and bulk containers to beverage cans, food tins, foil trays, metal bottle tops (closures) and foil wrap, and in very small quantities as a constituent of multi-layer packaging.

## 2.4 MetPac-SA Membership

MetPac-SA is open for membership applications from all producers, importers, brand owners and converters that place more than 10 tonnes of metal packaging on the market annually, as per the EPR Regulations. The membership agreement document has been revised at the request of members to reflect the legal obligations of both parties. The revised document is being implemented in a phased approach with all existing and new members.

The metal packaging value chain previously focused predominantly on used beverage cans (UBC's), which is therefore well represented in MetPac-SA's membership. There is a large portion of the metal packaging industry in South Africa that has started to actively participate in EPR obligations or as a member of the MetPac-SA as a PRO.

**Figure 2** indicates the metal packaging types represented as members of MetPac-SA, i.e. Producers registered with MetPac-SA.

A full list of members is included in **Annexure A**.

<sup>3</sup> DFFE Technical Assessment, December 2022 – DFFE has set up a panel of experts to interrogate each of the EPR fees.



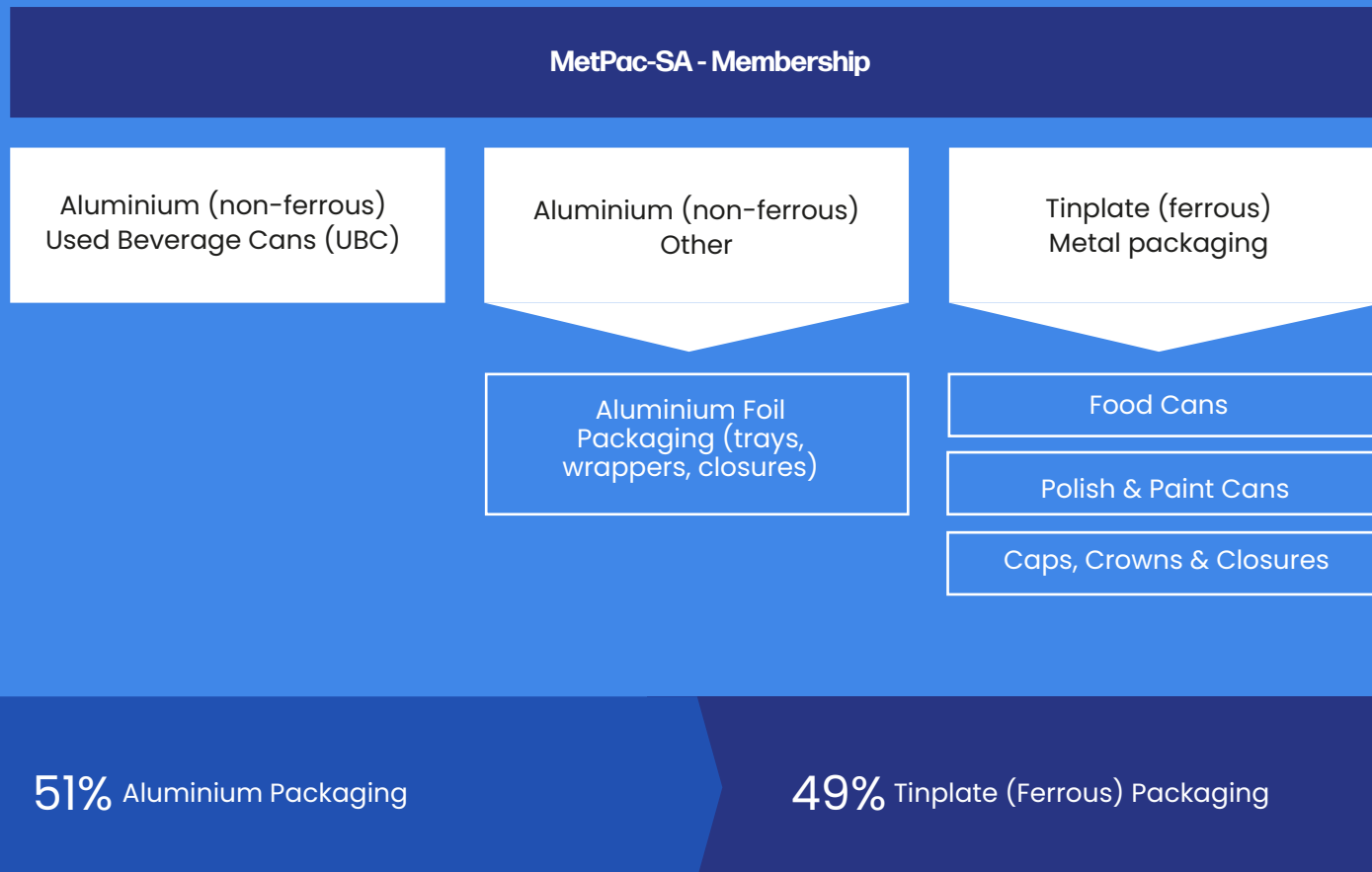


Figure 2. MetPac-SA membership representation for Year 2 (2023)

Part of the MetPac-SA EPR scheme will be to continue to develop metrics to capture the information for both aluminium and tinplate (ferrous) metal packaging respectively.

MetPac-SA's Overarching objectives are:

- To review global best practice with respect to post-consumer metal packaging recovery models.
- To improve the reliability of the current South African post-consumer metal packaging data acquisition and reporting systems.
- To measure and record South African post-consumer metal packaging recovery models against global best practice models and required EPR targets.
- To develop a sustainable model for post-consumer metal packaging in South Africa that supports job creation and transformation.

## 2.5 Transparency

MetPac-SA shares all reports and data in a consolidated format with members. Two working groups have also been set up for ferrous (steel) and aluminium and encourages members to join. The working groups were held monthly when they were first initiated and since 2023, these are held quarterly. The intention of the working groups is to engage members on potential projects and continued improvement of the implementation of the EPR Plan. The working groups are generally well attended, and members actively engage in the feedback and discussions.

## 2.6 Transformation

An overarching aim of the EPR plan is also to stimulate the economy through the increased collection and recycling of metal packaging building on existing programmes, creating new ones and thereby creating additional ownership and employment opportunities. MetPac-SA Board members and member organisations will focus a large portion of their business in terms of stimulating the market to initiate opportunities for historically disadvantaged individuals, focusing on women, youth and persons living with disabilities, through many of their partnership programmes.

MetPac-SA aims to focus on bringing about transformation within the metal packaging industry, across the entire value chain as follows:

- Ensure transformation takes place within the MetPac-SA Board in the first 5 years of the EPR implementation to ensure that it is more representative. Board member roles, such as the Chair and Vice-Chair, will be rotational roles to ensure effective skills and institutional knowledge transfer.
- Transformation will be a requirement for any potential project that is required and needs investment in terms of financial, technological or infrastructure support.
- The transfer of skills will be facilitated to ensure that new candidates are mentored and supported to allow them to effectively run a mechanical recycling operation in terms of the technical, financial, management and commercial skills.
- Mentorship and training in terms of obtaining and managing the working capital required to start and operate a mechanical recycling operation.
- Mentorship and training in terms of operating the business from an operational perspective will be provided.

As per the EPR requirements, a National Environmental Management: Waste Act (59/2008): Regulations regarding extended producer responsibility (5 November 2020) as amended, article 5 (1) The producer of a product or class of products, as identified by the Minister in terms of section 18(1) of the Act, must:

*(w) collaborate as producers of an identified product and in consultation with the Department responsible for Trade, Industry and Competition, to develop a broad -based black economic empowerment transformation charter with targets, timelines and implementation measures, within two years of the publishing of the Notice, which transformation charter must comply with section 9(1) of the Broad -Based Black Economic Empowerment Act, 2003 (Act 53 of 2003) and must include a special focus on women, youth and people living with disabilities.*

This has been addressed by the PRO Alliance as a collective challenge. See Section 5.7.1 for further details.



## 2.7 Job creation

### 2.7.1 MetPac-SA Staff

MetPac-SA's staff complement increased during 2023 by 1 member. Current contracts are held by:

- Kishan Singh (CEO)
- Lara-Jane Venter (Administrator)
- Dr Ravi Nadar (Research Analyst)
- Annamarie Botha (Finance)
- Monique Holtzhausen (Marketing)
- Keaoleboha Sefako (Marketing)
- Bonté Edwards (EPR strategy and implementation)
- Sally-Anne Kasner (EPR strategy and implementation)

MetPac-SA will continue to keep the staff complement to a minimum to ensure that funds received from members are used most effectively in project implementation.



### 2.7.2 MetPac-SA Project Support Job Creation

Through our partnerships, MetPac-SA has supported 7 250 waste pickers that collect metal packaging through their partnership with Petco and Polyco/Packa-Ching.

The support provided to GetMetal Group and CL Trading by MetPac-SA, although not creating jobs directly, has resulted in the facilitation of a small collection and recycling business and contributed to the income of several community members.

MetPac-SA's Waste Characterisation project created a total of 27 jobs. Proof of the jobs created is provided in **Annexure D**.

In recent discussions between Durban University of Technology's (DUT) Department of Management Sciences and the CEO of MetPac-SA, a significant partnership opportunity has emerged. MetPac-SA, a leading metal packaging producer responsibility organisation, has expressed interest in collaborating with DUT to provide practical fieldwork opportunities for 15-20 third-year Environmental Management / Operations Management / Quality Management students in the environmental management space during the course of Year 3 (2024).

## 3 DFFE Correspondence & Action Plan

A representative from the DFFE, Mulalo Tshikotshi, conducted a verification assessment in Cape Town on 11 December 2023. The purpose of the assessment was to verify the Year 1 report and queries raised on this.

The assessment also included a site visit to one of MetPac-SA's partners, GetMetal, to view operations in Cape Town and Atlantis.

The DFFE requested a meeting with the MetPac-SA team on 13 March 2024. The purpose of the meeting was to discuss the reporting requirements for EPR jobs, the use of the provided template, and the submission of evidence. After the meeting, a Job Reporting Template was shared with the team. The completed template is included in **Annexure D**.

## 4 MetPac-SA Year 2 Annual Financial Report

The MetPac-SA EPR plan is part of a broader EPR strategy to transition South Africa's waste sector toward a more Circular Economy.

MetPac-SA acknowledges that metal packaging is part of a mixed waste stream consisting of assorted packaging material types and therefore endeavours to work closely with other PROs under the banner of the Paper & Packaging PRO Alliance to ensure that packaging is addressed on a macro level, while focusing on metal packaging at a micro level.

Although MetPac-SA represents Aluminium Beverage Cans and Tinsplate (Ferrous) Packaging, one financial plan and budget has been presented for Year 2 (2023) and therefore the annual report feedback is consolidated.

### 4.1 MetPac-SA's EPR Fees

A tiered approach to the EPR Fee has been implemented across the value chain. Note that all fees mentioned are excluding VAT.

The EPR fee proposed for Year 2 was increased by 25%. Reasons for the increase included, inter alia, provision for the Waste Picker service fee, the development of a B-BBEE transformation charter etc.

A technical assessment was conducted by the DFFE, dated December 2022 and received on 5 June 2023, followed by a letter dated 30 May 2023 and received 5 June 2023 regarding the concurrence of the Year 2 EPR fee. The outcome of the technical assessment and the letter stated that the Year 1 EPR fee from 2022 should continue in 2023.

**The Year 1 (2022) EPR fee therefore remained in force for 2023:**

Raw material manufacturers pay a flat fee based on a tiered volume system.

**Converters / Contract Packers**

<b>R16</b> per tonne for steel or tinfoil (ferrous)	<b>R12</b> per tonne for aluminium	<b>R5 000</b> membership fee per annum shall apply <sup>4</sup>
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**Brand owners**

Brand owners who source packaging from local converters (less tonnage exported) are levied:

<b>R135</b> per tonne for steel or tinfoil (ferrous)	<b>R105</b> per tonne for aluminium
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Brand owners who import filled metal packaging pay:

<b>R151</b> per tonne for steel or tinfoil (ferrous)	<b>R117</b> per tonne for aluminium	<b>R5 000</b> membership fee per annum shall apply <sup>5</sup>
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The audited financials provide a summary of the financials and indicates the percentage split for administrative costs for Year 2. The administration costs for MetPac-SA's EPR scheme are limited to salaries, overhead costs (utilities and rent) and Information Technology and Systems.

The finalised financials can be requested from the MetPac-SA administration team via email [info@metpacsa.org.za](mailto:info@metpacsa.org.za).

**4.2 Annual Financial Report**

<sup>4</sup> This fee relates to those that perhaps do not trigger the 10 tonne threshold but would like to participate in the EPR and contribute to the implementation of projects.

<sup>5</sup> This fee relates to those that perhaps do not trigger the 10 tonne threshold but would like to participate in the EPR and contribute to the implementation of projects.

Table 1: Year2 Draft Financials for MetPac-SA (January 2023-December 2023)

Description	% of income	Income/Cost
<b>Estimated income</b>		<b>15,675,776</b>
<b>Expenses</b>		
PRO Alliance	4%	615,917
Informal sector integration, Municipal support, collaboration, interventions & projects	16%	2,502,153
Marketing and advertising	1%	149,698
<b>Intervention/project costs</b>		<b>3,267,768</b>
Administration (incl salaries, rent etc)	16%	2,532,131
<b>Total Costs</b>		<b>5,799,899</b>

**4.3 Targets**

Table 2 and 3 show the tonnage and targets for Year 2 for Aluminium and Tinfoil (Ferrous) metal packaging based on representative membership of MetPac-SA from 1 January to 30 June 2023. This information has also been submitted on the DFFE template that was provided on the online system.

**R5,799,899**  
**Expenses**

**R15,675,776**  
**Estimated Income**



Table 2: Aluminium Tonnage and Targets – MetPac-SA Members for Year 2 – Jan-Dec 2023

Aluminium – UBC	2022		2023	
Totals – (tonnes)	49 288		52 325	
<b>Targets</b>	<b>Target</b>	<b>Actual</b>	<b>Target</b>	<b>Actual</b>
Product Design (recycled content)	11 829	13 801	14 651	16 041
Collection Target	30 559	29 494	33 488	25 764
Recycling Target	14 786	17 596	16 744	20 236*
Energy recovery / exports / other	15 772	11 898	16 744	18 644

\*The recycling tonnage includes aluminium UBC recycled locally into products such as ingots, as well as tonnage that is included in the beverage can manufacture process. Some of the products (ingots) are also exported and are therefore included in the export tonnage as well.

Aluminium – Other	2022		2023	
Totals – (tonnes)	4 056		2 693	
<b>Targets</b>	<b>Target</b>	<b>Actual</b>	<b>Target</b>	<b>Actual</b>
Product Design (recycled content)	-	-	27	**
Collection Target	892	26	646	114
Recycling Target	406	26	296	63.3
Energy recovery / exports / other	487	-	350	48 ***

\*\* MetPac-SA is working with members to get an understanding of recycled content for the packaging types included in Aluminium-Other

\*\*\*In terms of Aluminium (Other), the energy recovery/exports target is unlikely to be met and will be discussed with DFFE going forward. It should be noted that Aluminium (Other) refers to pure aluminium and does not include aluminium that is part of multi-layer or flexible packaging.

Table 3: Tinplate (ferrous) Metal Tonnage and Targets – MetPac-SA Members for Year 2 – Jan-Dec 2023

Tinplate (Ferrous)	2022		2023	
Totals – (tonnes)	35 971		52 867	
<b>Targets</b>	<b>Target</b>	<b>Actual</b>	<b>Target</b>	<b>Actual</b>
Collection Target	20 144	98	30 134	2 099
Recycling Target	19 065	98.3	28 548	1 694*

\*Limited recycling data is available due to the challenges in differentiating ferrous packaging from other light steel at the point of recycling. Although it could be assumed that all ferrous packaging that is collected is recycled, MetPac-SA has only reported on actual data of scrap metal recycled and applying the waste characterisation data outcomes to report the recycling target.

## 5 EPR Implementation

MetPac-SA has continued to implement existing projects from Year 1 of the EPR scheme during Year 2, as well as commencing with new projects. Additional projects will continue to be determined and established in line with MetPac-SA's membership to reach the legislated targets.

An increase in membership and projects has required MetPac-SA to increase its staff complement – refer to **Section 2.7**.

### 5.1 Sponsorships

MetPac-SA has provided R55,000 sponsorship for the Institute of Packaging South Africa (IPSA) Gold Pack Awards Programme, which has the following impact on environmental sustainability and circular economies in the packaging industry of South Africa.

- Promotion of Sustainable Packaging: The Gold Pack Awards Programme can encourage participants to focus on developing sustainable packaging solutions that have minimal environmental impact. This emphasis on sustainability may drive companies to adopt eco-friendly materials, reduce waste generation, and minimise carbon footprints.
- Recognition of Circular Economy Initiatives: Circular economy principles aim to minimize waste and maximise the reuse, recycling, and regeneration of resources. The awards program can highlight and celebrate packaging designs that embrace circular economy principles, thus inspiring other players in the industry to adopt similar approaches.
- Innovation in Recyclable Packaging: Awarding innovative recyclable packaging solutions can motivate companies to invest in research and development for better recyclability and recovery of packaging materials. This can contribute to reducing the amount of packaging waste that ends up in landfills or oceans.
- Consumer Awareness: Winning products or designs may receive media attention, leading to increased consumer awareness of sustainable packaging practices. Educated consumers are more likely to support products packaged in an environmentally responsible manner.

- Collaboration for Sustainability: The Gold Pack Awards Programme can serve as a platform for industry stakeholders to come together and discuss sustainability challenges and opportunities. This can foster collaboration and knowledge-sharing among companies, suppliers, and organisations, accelerating the adoption of sustainable practices.
- Economic Incentives for Circular Practices: Recognition and awards can create economic incentives for businesses to adopt circular economy practices. Companies that demonstrate commitment to environmental sustainability may attract more customers and investors who prioritise sustainable choices.
- Government and Industry Support: The success and prominence of the Gold Pack Awards Programme can influence government policies and industry standards. Recognising sustainable packaging solutions may encourage policymakers and industry associations to develop regulations and guidelines that promote circular economy principles and sustainability.

Overall, the impact of IPSA's Gold Pack Awards Programme, established in the early 70s, on environmental sustainability and circular economies in the packaging industry has been significant. By celebrating and promoting sustainable practices, the program drives positive change, inspires innovation, and contributes to the overall goal of creating a more sustainable and environmentally responsible packaging industry in South Africa.

## 5.2 Knowledge Sharing and Awareness

Working groups have been established for both aluminium and ferrous specific packaging materials where details of the EPR implementation is shared in a collaborative and pre-competitive space. All data shared during these discussions is presented in an aggregated manner, with the main purpose of encouraging additional ideas and actions to reach the EPR targets.

MetPac-SA also works closely with various stakeholders, such as government departments and the metals sector to ensure that MetPac-SA provides the necessary support to all role-players in the value chain from collectors to recyclers. This is to make sure that the required quantity of metal packaging is returned to the manufacturing industry.

## 5.3 Plant The Seed

MetPac-SA has sponsored the development of an educational video on metal packaging recycling, which was produced by Plant the Seed as part of a video series.

Plant the Seed's distribution strategy is specifically focused on schools across South Africa, with the potential for expansion throughout Southern Africa in the future. The videos will be freely accessible to the public on YouTube, which means they have the potential to reach not only students but also citizens and corporate employees.

The video will be available on the MetPac-SA website.

Plant the Seed currently has access to over 100 schools and aims to significantly increase this number by engaging more partner organisations and leverage the expanding network to effectively roll out and distribute the video series. By the end of 2024, our target is to reach a minimum of 2000 schools.

## 5.3 Strategic Partnerships

MetPac-SA believes in building strategic partnerships in a collaborative approach and building on existing market networks. MetPac-SA has formed strategic partnerships to date with Collect-a-Can, The Metal Recyclers Association, GetMetal Group, Heneken, Hulamin Recycling, and Packa-Ching all of which are organisations that have extensive networks nationwide and are well placed to assist with meeting targets linked to the EPR regulations, provision of data, as well as assisting with meeting the broader socio-economic requirements. This includes the provision of training, equipment and capacity building to move through the value chain.

Memoranda of Understanding (MOU) and Non Disclosure Agreements (NDAs) have been developed with several other organisations to better understand export data and collections data etc. This includes foundries, waste service providers, buyback centres and recyclers. Due to the nature of the NDAs, the details cannot be disclosed as yet.

The following projects have been identified which align with the objectives of the EPR strategy:

### 5.3.1 Empowering Communities and Entrepreneurs

This includes support for entrepreneurs to start their own recovery businesses through providing financial support, premises from which to operate from, balers, conveyors, magnets, PPE, collection vehicles and trailers, scales, bulk bags, start up cash, cans sold to Collect-a-Can etc. The overall intention of these initiatives is to:

- Increase recovery of metal packaging
- Job creation and work opportunities
- Upliftment of communities
- Meet the requirements of the EPR Regulations

MetPac-SA provides support to CL Trading. CL Trading, predominantly based in Stellenbosch, was established in 1996 and specialises in recycling, waste management, scrap metal, and steelwork. CL Trading is also actively involved in community initiatives, playing a significant role in community clean-up efforts, promoting recycling, and raising environmental awareness.

MetPac-SA provided funding to CL Trading which was used to acquire two robust recycling cages, designed to handle higher load capacities. These cages are particularly suitable for the collection of heavier materials, such as metal packaging. The recycling cages allow for an increased volume of materials to be collected in a single trip, as well as the improved safety and organisation of the collection process. Materials are now better contained during storage and secured during transportation, reducing the risk of accidents and injuries, and promoting a cleaner and more organised environment.

The funding from MetPac-SA has also enabled CL Trading to extend its services to outlying businesses in Dunoon, Cape Town, by making the collection process more cost-effective. One of the recycling cages has been provided to Errol, a local entrepreneur based in Dunoon facilitating his small collection and recycling business and contributing to the income of several community members who collect recyclable materials. The recycling cage offers a secure location for the collected materials. Once the cage is full, Errol communicates directly with CL Trading via WhatsApp for pick up. The materials are then transported to CL Trading's Brackenfell buy-back centre, weighed and Errol is paid via electronic funds transfer.



The other recycling cage is rotated between several businesses and industrial processors in outlying areas. This strategy has made it feasible to collect material from locations that were previously too distant, ensuring that more material ends up within the circular economy.

While the contribution from MetPac-SA was specific to the funding for two recycling cages, its impact on the operations of CL Trading has been significant. It has contributed to an incremental improvement in the collection and recycling efforts of all materials, including metal packaging, reinforcing CL Trading's commitment to efficient and sustainable waste management.



Figure 3. Waste Cage being delivered by CL Trading

### 5.3.2 Schools' Competition

MetPac-SA sponsored the INEOS Treasure for Trash and Trash 4 Treats Schools Recycling Project, which encourages primary school learners to recycle for the reward of healthy snacks and treats. The schools compete against one another to collect the most sorted recyclable waste per capita. The schools that collect the most recyclables during the year will win their share of R100 000 towards school upgrades. Participating schools each receive three large recycling bins and bulk bags to collect their recyclables. Each school is paired with a local collector who collects and buys back the recyclables at the going rate.

This creates a sustainable and mutually beneficial relationship between the school and the waste entrepreneur. These collections are subsidised by the project.

- Education / awareness
- Upliftment of schools
- Increased recoveries

Progress to date includes:

<b>30</b> Schools participated in the Western Cape	<b>31 000</b> Learners engaged	<b>158,055 kgs</b> Recyclables diverted from landfill
<b>R70,313</b> Income received to the schools	<b>13,583 kgs</b> Metal recycled (aluminium)	<b>4,807 kgs</b> Ferrous (steel) cans recovered

In Year 3 (2024) the competition will include KwaZulu-Natal, Gauteng and the Western Cape.

### 5.3.3 Understanding The Recovery of Ferrous (Steel) Packaging

Year 1 identified many gaps in information for ferrous (steel) packaging (e.g. food cans) – as outlined in the Year 1 annual report. One of the main findings of ongoing research in this area is that ferrous packaging is not recorded separately at metal scrap dealers or buy-back centres. Ferrous packaging is recorded together with light steel as a material stream. It therefore makes it very challenging to understand accurate tonnages of ferrous packaging collected as a stand-alone stream.

In 2023, MetPac-SA therefore undertook two major projects to better understand the recovery of ferrous packaging i.e. Mapping strategy and a Waste characterisation.

#### 5.3.3.1 MetPac-SA Data Acquisition And Mapping Strategy

In 2023 MetPac-SA embarked on a strategy to map the steel and aluminium metal packaging buy-back centres and re-melters in South Africa. The key objective of this strategy was to engage with these key role players for data acquisition and enhancement of post-consumer metal packaging recovery.

Interviews and surveys were conducted with various players along the value chain in the scrap metal sector to better understand the value chain, constraints, issues being experienced and where best to collect the data to report against collection, recycling and export targets. Initial outcomes of the survey indicated the following:

- Metal packaging gets combined according to the grade of metal, not the type of packaging.
- Ferrous packaging is combined with the light steel ferrous scrap metal stream once it is collected.
- Economic polices make the export of scrap metals very difficult so most is sold domestically at reduced prices. The ban on the export of ferrous scrap metal specifically is suppressing the scrap metal price in the local market.
- Metal packaging is often sold directly to scrap metal dealers and not to buy-back centres or recyclers.
- Pricing is often volume related.

A total of 20 formal requests were emailed and 45 telephone cold calls made using website contact details. Since October 2023, 10 of these organisations have responded and been visited. Site visits to some buy-back centres were facilitated by Petco as part of MetPac-SA's collaborative relationship.

MetPac-SA is, however, experiencing difficulty in obtaining feedback or a commitment from buy-back centres and re-melters. The majority of the buy-back centres and re-melters have not responded to date and therefore the project continues. The absence of commitment can be attributed to the fact that although these facilities are integral to the recycling value chain, they are not explicitly covered by the S18 of NEMWA (Extended Producer Responsibility) legislation.

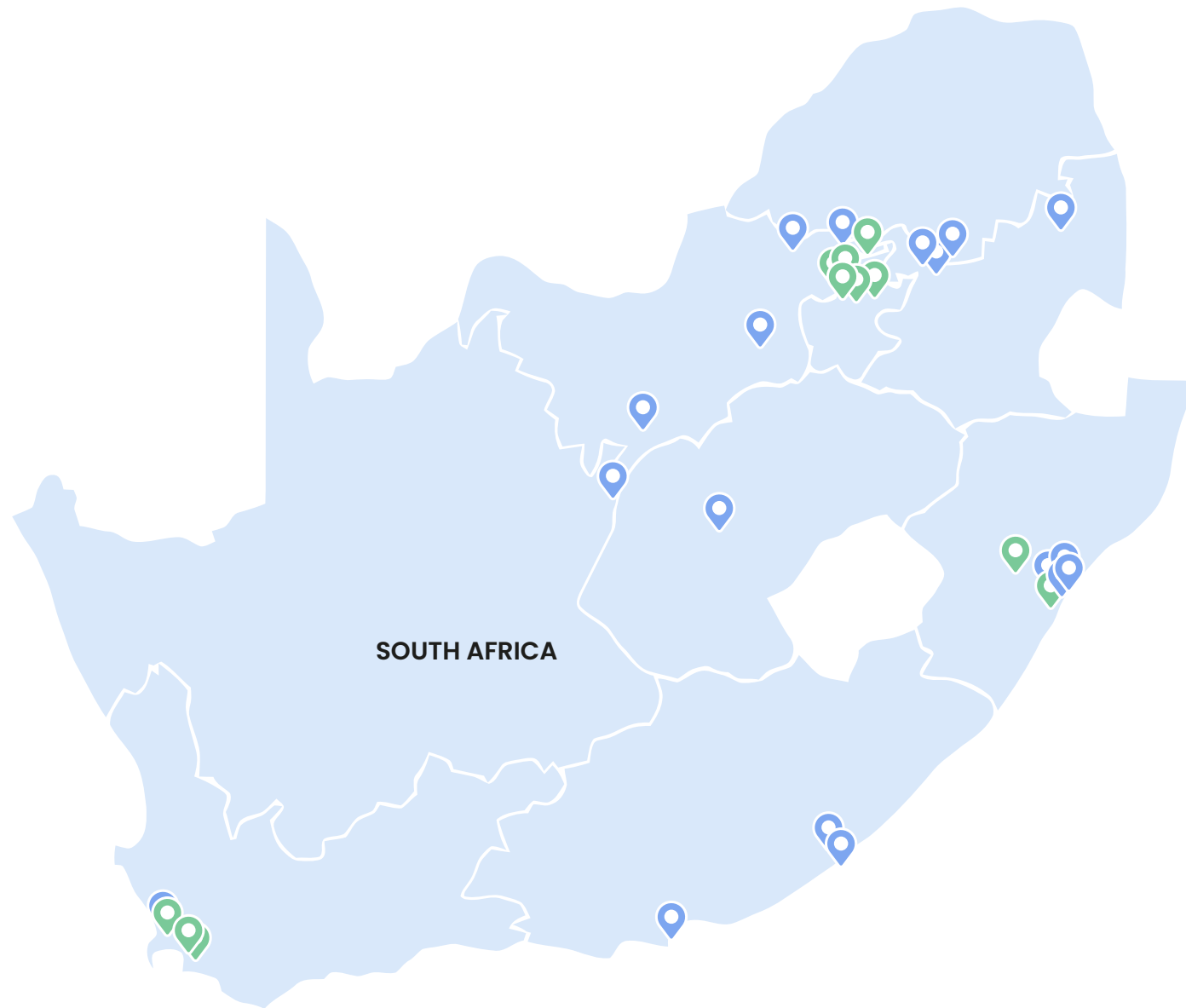


Figure 4: Map of South Africa and its buyback centres and re-melters (Source: R. Harichunder own image)

The map presented in Figure 4 was created using the locations of the contact list. The green points on the map represent the buy-back centres and re-melters that MetPac-SA was able to create relationships with. The orange points on the map represent those facilities where no contact or declined response was received.

Name of Company	Buyback Centre	Re-melter	Positive Response	No / Declined Response
<b>WESTERN CAPE</b>				
GeT Metal	X	X	Y	
Kanter Meals	X			X
Mega Meals	X			X
Recycle 1st	X		Y	
The Reclamation Group	X			X
Wasteplan	X			X
<b>EASTERN CAPE</b>				
Ihlumelo Scrap Metal	X			X
Inca Metals	X			X
Non-Ferrous King (Pty) Ltd	X			X
<b>GAUTENG</b>				
African Scrap Recyclers	X			X
Concord Metals	X			X
Collect-A-Can	X		Y	
Gauteng Metal Recyclers	X			X
GeT Metal	X	X	Y	
Grid Metals	X			X
Heineken	X		Y	
Honeydew Metal Recycling	X			X
RB Scrap Metals	X			X
Rustivia Metals CC	X		Y	
SA Metal	X	X		X
Spot Cash Metals	X			X
Split Rock Recycling	X		Y	
Super Metals Recyclers	X			X
The Metal Bin	X			X
Universal Recycling Company	X			X
Vortex (Pty) Ltd	X			X
West World Recycling	X		Y	

Table 4: List of buy-back centres and re-melters/recyclers mapped in South Africa



Name of Company	Buy-back Centre	Re-melter	Positive Response	No / Declined Response
<b>KWAZULU-NATAL</b>				
Afro India Rolling Mills	X	X	Y	
Chowans Scrap Metal	X			X
DMS Recycling	X			X
Durban Metal Company	X			X
Durban Scrap Metal Buyers	X			X
Hulamin		X	Y	
Industrial Scrap Metals CC	X			X
Insimbi Metals Recycling	X			X
North Coast Scrap Metal	X			X
Quantum Recycling Solutions	X			X
Suhag Investrade (Pty) Ltd	X			X
Sunset AIP Recycling (Pty) Ltd	X			X
Swan Metal Recycling	X			X
<b>LIMPOPO</b>				
NN Metals Phalaborwa (Pty) Ltd	X			X
Polokwane Scrap Metal	X			X
<b>MPUMALANGA</b>				
Chopin Scrap Metal Dealers	X			X
Dark Metals Klipfontein	X			X
Highland Metals	X			X
JH Metals	X			X
MRS Scrap Metal	X			X
Nieuwco Mpumalanga (Pty)	X			X
<b>NORTH WEST</b>				
Envirocycle de Wildt (Pty) Ltd	X			X
NW Reclaiming and Steel Merchants	X			X
Reclam 2 Rustenburg	X			X
<b>NORTHERN CAPE</b>				
Metal Worx Recycling	X			X
P A Walter Africa (Pty) Ltd	X			X

### 5.3.3.2 Waste Characterisation

During Year 1, MetPac-SA was in discussion with the metal recycling industry and foundries to gain better insights into the ferrous (steel) packaging being recycled in the country. It was confirmed that the scrap metal percentage accepted ranges between 20 to 80% external scrap sourced from scrap yards. It was however previously assumed that metal packaging makes up 3-4% of the scrap metal waste stream. Based on the wide range of accepted scrap and limited knowledge on the amount of packaging within the scrap, MetPac-SA embarked on a waste characterisation project. The aim of the waste characterisation was to assist in obtaining a better understanding of scrap received at recyclers and foundries. The data obtained could then be applied to scrap metal recycling data as a whole, from which the packaging fraction could then be extrapolated.

MetPac-SA partnered with a major metal buy-back centre / recycler / re-melter facility to undertake a four-month waste characterisation exercise to establish the tonnage of steel (ferrous) packaging collected, as a percentage of the total light steel tonnage collected for recycling. This was achieved by employing 15 people to physically separate the steel (ferrous) packaging from the total steel and light steel that was collected across 8 buy-back centres, whilst 12 people performed the data capture. In total, 27 jobs were created by this exercise.

The results of the waste characterisation are presented in Table 5, which indicates that only 2% of the light steel that is collected at buy-back centres is steel (ferrous) packaging.

	4 Month Average
Light Steel Total Collected (tonnes)	1381
Light Steel Packaging Total (tonnes)	24
% Steel Packaging vs Total Light Steel	2%

Table 5. Waste characterisation results over 4 months

This exercise is planned to be repeated in 2024 by partnering with other major buy-back centres, recyclers across SA, to determine the statistical reliability of this model.



Figure 5: Photos from the launch of a Packa-Ching unit

### 5.3.4 Packa-Ching

MetPac-SA has continued to partner with Packa-Ching with the aim of supporting the expansion of Packa-Ching operations to allow for an increase in the collection of metal packaging.

Packa-Ching falls under Polyco and is a mobile buy-back centre programme, consisting of a vehicle and trailer, which is based on an owner-operated enterprise development model. The intention of Packa-Ching is to provide a mobile collection service that encourages and allows individuals living in low-income areas and informal settlements to recycle all materials. The service provides an income earning opportunity for the community and contributes to cleaning up the environment.

### 5.3.5 Petco

Petco, BanQu, Kudoti and Lariat Technologies have partnered to enable non-competing PROs like MetPac-SA, to leverage Petco's buy-back centre data to pay waste-picker service fees monthly. MetPac-SA have therefore partnered with Petco to provide financial support, which will support Petco in their BBC field operations and in expanding the adoption of BBCs in the network, as well as the continued and increased roll-out of the BanQu and Lariat data management and payment systems. Figure 6 and Figure 7 provide the geo-spatial representation indicating the location of transactions as captured on Petco's BanQu and Lariat trading systems for the data provided for this Interim reporting period.

MetPac-SA see that a collaborative approach in supporting the recycling sector will be much more effective in the long-term to support the sector and access the data required for reporting. Petco provides MetPac-SA with metal packaging collection data, as well as the number of waste pickers and Buy-back centres supported by this collaboration.

The partnership with Petco provides the following:

- Access to the correct data for waste picker Service Fee Payments.
- Access to Petco's network and support the development of new and existing buy-back centres.

This collaboration has resulted in 195 Waste Pickers to be paid the service fee on 66 tonnes of metal packaging collected.

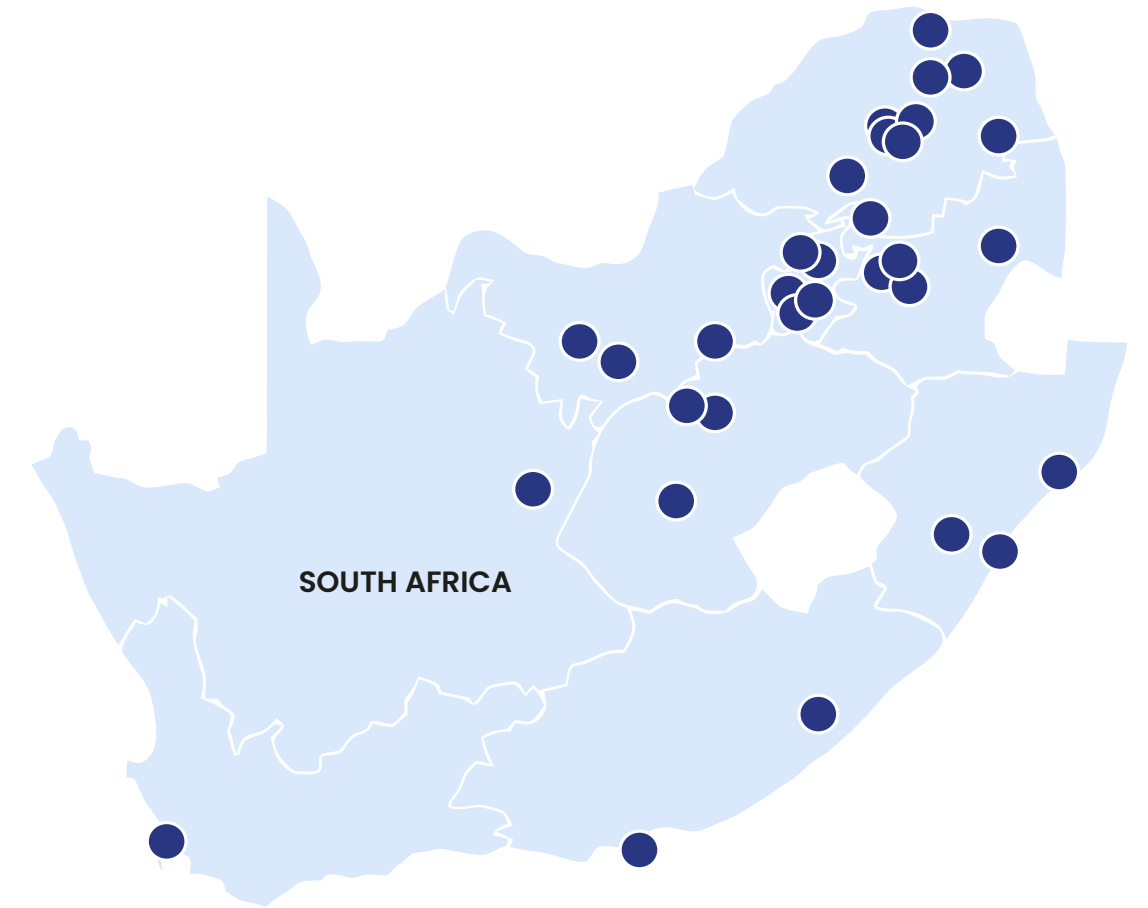


Figure 6: Geo-spatial representation displays the locations of transactions as captured on Petco's BanQu trading system

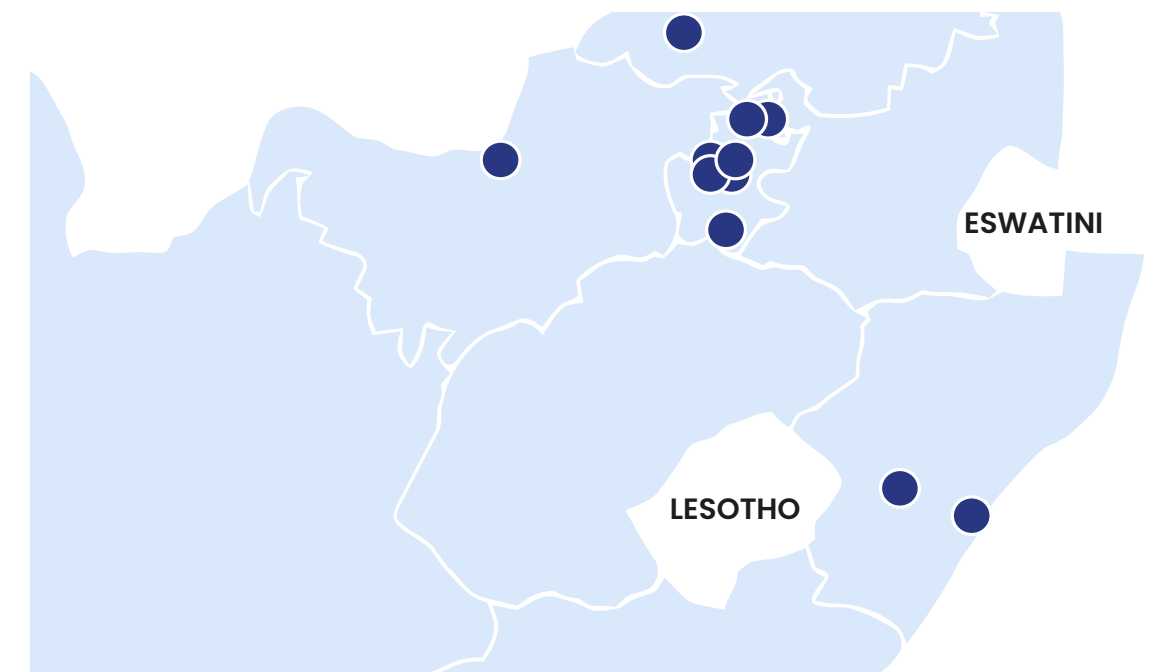


Figure 7: Geo-spatial representation displays the locations of transactions as captured on Petco's Lariat trading system



### 5.3.6 Packaging Working Groups

During Year 1, MetPac-SA formed working groups with aluminium Used Beverage Cans (UBC) and ferrous packaging members. Participation in the working groups is voluntary and open to all members to assist and provide input for the development of the strategies for ferrous collection and recycling and is a platform for members to provide feedback or industry insights and to raise queries or concerns.

Future working groups will be formed to participate in research and development in problematic waste streams, such as paint cans, multi-layer materials or foil heat trays. Where redesign and removal or phasing out of these materials from the packaging stream is not possible, the research will focus on:

- Redesign of the packaging to encourage post-consumer recovery and recycling
- Recycling systems for these material streams.
- Technology developments to increase the recycled content in metal packaging.
- Technological and infrastructure requirements to assist in increased collection volumes and aggregation.

### 5.4 Material Flow Analysis (MFA) For Used Beverage Cans (Aluminium)

One of the main focus areas for MetPac-SA that has continued in Year 2 is understanding the market dynamics and data for UBC of MetPac-SA members. Therefore, updating the Material Flow Analysis (MFA) will continue, building on the 2021 and 2022 MFA. The aim is to assess the flow of aluminium beverage cans in the South African Market of MetPac-SA members. The analysis includes flows from the manufacture of beverage can metal coils to its end-of-life and recycling.

The MFA study has highlighted that there are still gaps in terms of the accuracy of some of the data that has been collected e.g., exports. MetPac-SA continues to pursue various avenues of data collection to provide a higher degree of accuracy.

Studies like the MFA provide a firm baseline from which to work. Building on this information will continue throughout the implementation of EPR over the next 3 years. Due to the complexity of the Tinplate/Ferrous value chain and packaging being such a small percentage of metal recycling, it will not be possible to develop an MFA for Tinplate/Ferrous for MetPac-SA members at this stage.

### 5.4 Data and Information

The metal packaging industry's recycling statistics are not always clear as metal packaging is mixed with other scrap metals for recycling and once smelted can be reused for anything, i.e. car parts can be used, for example, to make metal cans and cans can be used to make other metal goods.

The metal packaging industry therefore needs a clear understanding of packaging numbers (in terms of weight and numbers) at various points within the value chain and very specifically to understand the following:

- Metal packaging items produced locally.
- Metal packaging items imported (empty and filled items but excluding raw materials still to undergo further processing).
- Metal packaging items collected and recovered.
- Metal packaging recycled for packaging vs recycled for other metal products.

With the continued collection and interrogation of this data, MetPac-SA will understand the full value chain of its members and be able to undertake a gap analysis, which will form an integral part of other projects, such as how best to work within Municipalities and Industry to ensure the best collection rates possible.

MetPac-SA will continue to place a dedicated focus on establishing accurate data and information to allow reporting on behalf of its members to take place in accordance with the legislative requirements. The reporting systems focus on:

- Replacing the information around "estimated" content in metal recovery reporting with more accurate numbers from formal research across the metal recyclers and sorting facilities (e.g. material recovery facilities and buy-back centres) which are in play already.
- Establishing a more accurate metal recovery baseline for year-on-year reporting to DFFE for MetPac-SA members.
- Achieving higher resolution of data and reporting between steel and aluminium packaging for MetPac-SA members.
- Improving the reliability of the current South African post-consumer metal packaging data acquisition and reporting systems for MetPac-SA members.

One of the aims of the data collection will be to provide support and input into future projects for its members to have a better understanding of the types of metal packaging that require support and further projects to address areas where recycling rates are not being achieved e.g. steel food cans, foil trays.

### 5.5.1 Export Data

Actual export data for metal packaging is challenging to obtain for the following reasons:

- ITAC and tariff codes are for various types of metal waste but do not single out metal packaging.
- Reconciling data between export permits issued and actual exported tonnages is challenging.
- Trade agreements and barriers impact on export tonnages.
- Preferential Pricing System appears to impact the retention of metals for recycling on the local market.
- UBC scrap is combined under an Aluminium Scrap tariff code and is not exported as a separate material stream under its own tariff code.
- UBC is exported either as baled UBC or locally smelted and exported in ingot form.
- Approximate 6 week lag in the release of export data.
- The ban on exports has driven down the local light steel scrap prices, which has resulted in some scrap dealers and buy-back centres not buying steel packaging material, such as food cans as there is a limited market and demand for them to sell onto.

MetPac-SA continues to work with different stakeholders to gather the best insights and ways to identify accurate data and support to the local recycling industry.

## 5.5.2 Collection Data

MetPac-SA members do not collect metal packaging and cannot provide this data. MetPac-SA is therefore approaching various stakeholders along the value chain to obtain collection data, however, the following challenges are being experienced:

- Double counting as scrap metal is often sold numerous times as it moves along the value chain i.e. from waste picker to small recycler to large recycler to foundry.
- Lack of granularity in scrap metal data as packaging is a very small fraction.
- Administrative delays in obtaining data due to confidentiality and contractual requirements.

These challenges are continuing to be addressed through various stakeholder engagements.

## 5.6 Recycled Content

The definition for "recycled content" in terms of the EPR Regulations is: "the proportion, by mass, of post-consumer recycled material in a product or packaging excluding any pre-consumer waste".

The International Organisation for Standardisation (ISO) ISO 14021 defines recycled content as:

- "The proportion, by mass, of recycled material in a product or packaging."
- "The standard only considers pre- and -post-consumer waste to be recycled content."<sup>7</sup>

Therefore, the definition of "recycled content" is not aligned to global best practice as per ISO 14021. MetPac-SA accept that "pre-consumer" material should not be included in "collection" or "recycling" targets however, it must be included in "recycled content" as per the international standards.

MetPac-SA and its members have adopted the international definition for reporting recycled content. All imported metal will include a portion of recycled content, defined on this basis. Many of MetPac-SA's members are international companies or import products from international companies. Failing to align the local definition with the global definition would make consolidation of local/imported content practically impossible.

MetPac-SA continues to work with their members to collect recycled content data, specifically for imported products.

Further engagement with DFFE is also required to develop an accurate and practical solution for reporting that meets the international and best-practice standards.

In terms of local recycling activities, MetPac-SA is engaging with the local recycling industry to understand the material losses that take place in the smelting process and how these can be reduced or better managed.

<sup>7</sup> **Pre-consumer material:** Material that is separated from the waste stream during manufacturing. This does not include scrap or other materials that are generated and reused during the same process. This material is also known as post-industrial recycled content.

**Post-consumer material:** Material that is generated by the end-users of a product that can no longer serve its initial purpose. This includes material returned from the supply chain.

**Recycled Material:** Material that has been reprocessed from recovered [reclaimed] material by means of a manufacturing process and made into a final product or into a component for incorporation into a final product. (Source: ISO 14021:1999) Scrap, Rejected or discarded material generated by a manufacturing process.



## 5.7 The PRO Alliance

The Paper & Packaging PRO Alliance serves the common interests of all the PRO members with respect to addressing the compliance obligations of Section 18 of NEMWA. The PRO Alliance is made up of Producer Responsibility Organisations (PROs) in the paper and packaging sector, namely Aerosol Manufacturers Association of South Africa (AMASA), The EPR Waste Association of SA (eWASA), Fibre Circle, Metal Packaging SA (MetPac-SA), Petco PRO, Polycro PRO, and The Glass Recycling Company (TGRC) are working in collaboration with Waste picker Associations, SALGA and DFFE to implement a waste picker integration programme.

The intention of the PRO Alliance is to:

- Oversee services that have been awarded to service providers in particular. These services include the fulfilment of collection and recycling by waste management companies, amongst other services that may be required for the operation of the Alliance;
- Support local municipalities (where applicable) to increase the recovery of identified products from municipal waste;
- Support the process of integrating informal waste collectors, reclaimers and pickers into the post-consumer collection value chain;
- Utilise new and existing infrastructure across EPR schemes in a collaborative manner where feasible, or establish and operate new infrastructure for the enhancement of post-consumer recovery;
- Support the compensation of waste collectors, reclaimers or pickers, who register with the National Registration Database, for collection services and environmental benefits, through the collection service fee;
- Implement transformation within those entities with whom they contract, with a special focus on women, youth and persons living with disabilities; and
- Prioritise the promotion of small businesses and entrepreneurs with a special focus on women, youth and persons living with disabilities.

Main collaborative initiatives and projects include negotiations around Waste picker integration and the associated service fee and a cooperative approach to working with municipalities.

The following sections provide a position of the PRO Alliance of areas of common regulatory challenges.



### 5.7.1 Waste Picker Integration

MetPac-SA is committed to assisting the integration of informal waste collectors, reclaimers and pickers into the post-consumer collection value chain. In addition to this, MetPac-SA is required to compensate waste collectors, reclaimers or pickers, who registered with the National Registration Database, for collection services and environmental benefits, through the collection service fee by November 2022. Due to the centralised nature of this function, the Paper & Packaging PRO Alliance is overseeing this function for the PROs.

The PRO Alliance concluded the processes of taking over the further development and management of the South African Waste Picker Registration System (SAWPRS) and will, through the multi-stakeholder cooperation body, lead the processes of registration rollout, training, and awareness. To date, just under 9000 waste pickers have been successfully registered on the system.

During 2023, JG Afrika was appointed to conduct a calculation on the waste picker service fee quantum to guide the PRO Alliance's negotiations with waste pickers on this matter. The current 15c per kg fee was a temporary fee that expired in November 2023 and a revised fee, as per agreement with waste picker associations, will be negotiated between parties. MetPac-SA, in collaboration with Petco is registering additional buy back centres and recycling centres to enable the BanQu and Lariat systems to be installed and the facilities onboarded. Currently, the payment systems (BanQu and Lariat) are not syncing with the SAWPRS software, which is delaying the payment.



### 5.7.2 Broad Based Black Economic Empowerment (B-BBEE)

The EPR Regulations call for the development of a sector Broad Based Black Economic Empowerment Charter (B-BBEE Charter). The Paper and Packaging sector comprises various subsectors that may be classified under other sectors; it might not be necessary to have a standalone sector charter.

For example, the paper industry already complies with and is verified under the Forestry Sector Charter published in April 2017 (Gazette No 40803).

The glass, metals, e-waste, plastic sectors are measured and verified in compliance with amended B-BBEE Codes of Good Practice, published by the Minister of Trade, Industry and Competition in May 2019.

The DTIC advised that the sector needs to enhance compliance to the B-BBEE Codes of Good Practice instead of having to go through a process of developing specific charters that might be cumbersome given the multi-facet nature of the sector.

PROs forming part of the PRO Alliance comply with the B-BBEE Codes of Good Practice and will ensure annual verification through accredited verification agencies. Such verification reports will be submitted as annexes to respective annual reports submitted to the DFFE.

### 5.7.3 EPR Fee Concurrence

Currently, for EPR Year 3, the Minister of the Department of Forestry, Fisheries and Environment (DFFE) requires annual EPR Fee concurrence from the Minister of Treasury, before the fee can be levied. It must be noted that, during the EPR Year 2 implementation, the EPR Fee concurrence was received midyear resulting in the invoicing against the new fee commencing only during the second half of the year, compromising the execution of the EPR strategy.

The PRO Alliance is of the view that, to avoid such delays, a three-year fee concurrence will significantly improve project planning and collaboration decisions. Although a dialogue related to EPR Fee concurrence, amongst other pertinent matters, was held with the Minister of DFFE in October 2023, the PRO Alliance, to date, does not have written concurrence on the 2024 EPR Fee.



### 5.7.4 Municipal Collaboration

Though different PROs enter into specific collaborative agreements with municipalities, joint infrastructure programmes that are largely still in planning will be coordinated through the PRO Alliance. The Alliance appointed a Municipal Expert in partnership with GreenCape. This work resulted in developing various models for consideration by the PRO Alliance when considering collaboration agreements with municipalities.

The Alliance is at an advanced stage of concluding a collaboration agreement with the City of Cape Town on the further development and operationalisation of the Prince George drop-off facility.

Three other Collaboratory agreements are being finalised, these include: Gauteng Department of Environment (GDARDE), Bojanala Platinum District Municipality and City of Tshwane.

### 5.7.5 Reporting Periods

Reporting periods are not necessarily aligned to reporting cycles of company Financial reporting cycles, recyclers, processors back to PROs. Adding to this, there are time lags between feedback of the interim and annual reports from the DFFE is proving to be ineffective at monitoring progress. An integration of responses to review reports into the mid-term reports in the interim could assist in efficiency savings. Over the long term, consideration needs to be made of one consolidated annual report.

Ultimately, it is important to monitor the progress of the EPR implementation. Currently the following reporting cycles are in place for a PRO as per the Regulations:

- Annual report submission on previous year (31 March) – including audited financials.
- Interim Report for current year (30 June)
- Annual financial Plan and Budget (30 November)<sup>8</sup>

Perhaps, one way to streamline reporting is to forgo the interim full report, and for PROs to submit the progress towards targets.

## 6 Summary and Way Forward

The metal packaging industry continues to work on developing a clearer understanding of packaging numbers (in terms of weight and numbers) at various points within the value chain.

As this data grows, MetPac-SA continues to develop an understanding of the full value chain and continues with gap analysis as an integral part of identifying and developing projects for the members it represents in terms of the EPR regulations and compliance requirements thereof.

MetPac-SA will continue to place a dedicated focus on establishing accurate data and information to allow reporting to take place in accordance with the legislative requirements.

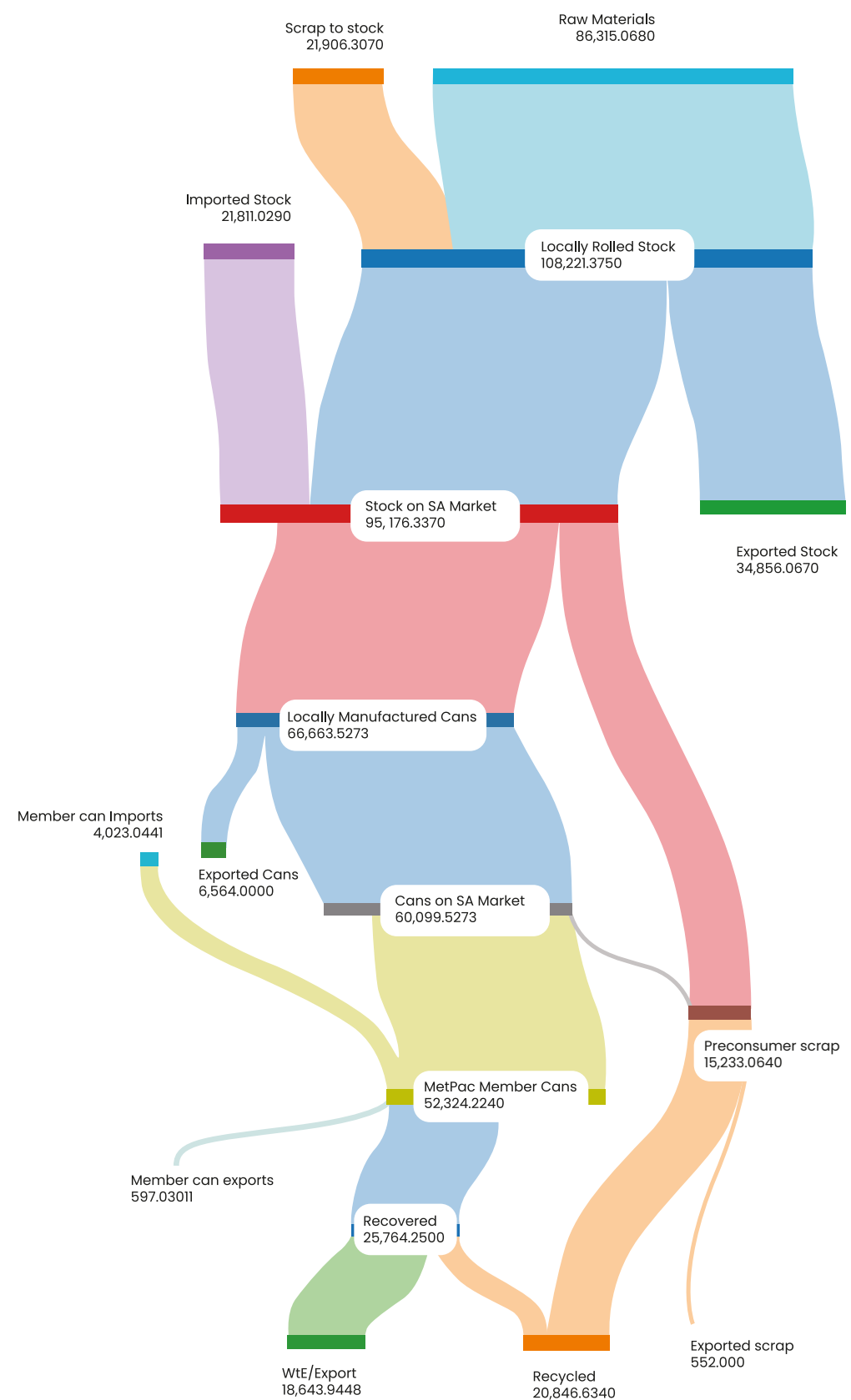
<sup>8</sup> In 2023, this report was requested to be submitted by 15 November by the DFFE

## Annexure A: MetPac-SA Members – Year 2





## Annexure B: 2023 MFA for Aluminium Beverage Cans



2023 Material Flow Analysis for UBC (Tonnes)



E-mail: [info@metpacsa.org.za](mailto:info@metpacsa.org.za)

Mobile: 082 880 9580

Fax: 086 710 3532

PostNet Suite #555

Private Bag X10

Elarduspark

0047