

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

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FROM: FISH HOEK VALLEY RATEPAYERS AND RESIDENTS ASSOCIATION

TO: MINISTER WATER AND ENVIRONMENTAL AFFAIRS: EDNA MOLEWA

SUBJECT: BANNING THE CHALK PLASTIC BAG

1. SUMMARY

In terms of the Environment Conservation Act No 73 of 1989 a number of sections give the Minister the authority to act stopping the production and use of non – recyclable plastic bags, as follows:

S 21. (a) (iv) the identification of the economic and social interests which may be affected by the activity in question ...” An industry spokesperson said that the non-recyclable bags now being used by our retailers, except Checkers, are cheaper to produce because the chalk additive is cheaper than the PE-HD polymer used in shopping bags. The cheaper the bags, the more money the retailer makes from selling them. Also, as plastic is a commodity with a fluctuating price, as soon as the oil price drops and correspondingly the price of virgin polymer, then industry prefers to use virgin plastic to recycled plastic. Our local recycler informed us that the big plastic collectors are no longer buying the plastic shopping bags as they say the chalk additive makes them too difficult to recycle. They are not able to distinguish between the all polymer and chalk plastic bags and thus, have decided to not take the business risk. The ‘cost’ of this is single-use plastic bags, which are sent to the landfill and the many that end up in the environment.

We call upon the minister in terms of S 20. “Waste Management (5) The Minister of Water Affairs may...(a)...control and management of disposal sites in general; (b) the control and management of certain disposal sites handling particular types of waste” to Gazette appropriate regulations banning the manufacturing and disposal of non-recyclable plastic bags.

In S 21. (1) “The Minister may ... identify those activities which in his opinion may have a substantial detrimental effect on the environment” and “(2) ... include any activity ... (f) industrial processes (i) waste ... disposal (j) chemical treatment” and S 22. “Prohibition of undertaking of identified activities” and (4) “... may withdraw the authorisation ... after at least 30 days’ written notice was given to the person concerned.” Surely, notifications must be sent to manufacturers and importers that plastic bags containing chalk will not be allowed.

S 24. “Regulations regarding waste management. – The minister may make regulations with regard to waste management, concerning –“ (d) “the reduction of waste by – (i) modifications in the design and marketing of products; (ii) modifications of manufacturing processes; and (iii) the use of alternative products”. As chalk containing plastic bags are not recyclable, this increases waste and thus, the modifications of design to include chalk should not be allowed.

We feel that in terms of “S 24. (e) “the utilization of waste by recovery, re-use or processing of waste;” recovery and re-use is prejudiced by the use of additives such as calcium carbonate which makes shopping bags difficult or impossible to recycle.

S 26. Regulations regarding environmental impact reports.- The Minister ... may make regulations with regard to any activity identified in terms of section 21 (1) ... concerning (a) the scope and content of environmental impact reports, which may include, but is not limited to- (ii) the identification of the physical environment which may be affected by the activity in question...(iii) an estimation of the nature and extent of the effect of the activity ... on land, air, water, biota and other elements or features of the natural and man-made environments; (iv) the identification of the economic and social interests which may be affected by the activity in question ... (v) an estimation of the nature and extent of the effect of the activity in question...on the social and economic interests;” We call upon the Minister to conduct a fresh EIA to look at the potential impact this change to non-recyclable plastic bags may have had upon landfill sites.

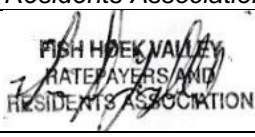
2. RECOMMENDATIONS

It is recommended that, for the reasons set out in this report that the Minister:

- Gazette appropriate regulations banning the manufacturing, importing and disposal of non-recyclable plastic bags;
- Gazette appropriate regulations establishing the minimum thickness greater than 80 microns and the exclusive use of virgin or recycled PE-HD polymer be used with suitable escalating fines for non-compliance;
- Send appropriate notifications to manufacturers and importers that plastic bags containing chalk (calcium carbonate) will not be allowed as these result in non-recyclable plastic and single-use plastic bags; and
- Conduct a fresh EIA to look at the potential impact this change to non-recyclable plastic bags may have had upon landfill sites.

Alternatively:

- Gazette the phasing of a complete ban on plastic bags, plates, cutlery and polystyrene boxes (as done recently in the Seychelles):
<http://www.seychellesnewsagency.com/articles/5957/Seychelles+going+green+with+ban+on+plastic+bags%2C+plates%2C+cutlery>; and
- Promote the use of environmentally friendly, biodegradable replacements, such as those using cellulose from sugarcane and forest fibre.

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SIGNATURE	
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