

FAQ's

1. How do I know whether I must join the IWMP?

Answer:

- If you are a producer of primary or secondary packaging, you will need to register with the DEA and you will need to subscribe to a registered IWMP.
- If you are an importer of primary or secondary packaging, you will need to register with the DEA and you will need to subscribe to a registered IWMP.
- If you are an importer of goods wrapped in primary or secondary packaging you will need to register with the DEA and you will need to subscribe to a registered IWMP.

2. If I only use 100% recycled material, do I need to register?

Answer: You do not have to register with the DEA. You **do** have the option to submit your own IWMP to the DEA or to subscribe to a DEA registered IWMP like POLYCO, there will be no levy charged to you.

3. I already pay the bag levy. Do I need to register?

Answer: Yes, you will still have to register with the DEA as a producer of primary packaging. As regards being a member the POLYCO IWMP, cognisance will be taken of the fact that you are already paying the excessive bag levy and a reduced levy will be charged on the polymer consumed in the bag manufacture.

4. I produce plastic products other than plastic packaging. Do I need to register?

Answer: You are not obliged to register under the Section 28 notice with the DEA or belong to an IWMP, however POLYCO offer an Associate Membership option which will demonstrate your support of the POLYCO IWMP. The cost to become an Associate Member is R10 000 per annum.

5. I am a subsidiary of a group. Must the group register or each manufacturing subsidiary?

Answer: The Intention is not to register each of the sites separately. The Head Office of the Group should register with the DEA. DEA needs confirmation from the Head Office or Corporate Office that there will be availability of information from the different operating sites.

6. I am a packaging producer and recycle all my internal factory waste. Do I need to belong to the IWMP?

Answer: Yes, you do need to belong to a registered IWMP. This plan deals with the end of life packaging that you produce that will negatively affect the environment. Recycling your factory waste is an efficiency cost saving.

7. How much will I have to pay to become a member of POLYCO?

Answer: The EPR levy structure will be dependent on several factors. The current EPR levy is R110 per ton.

8. I am a Retailer/Brand Owner and I buy local and import primary and/or secondary packaging material. What Levy will I have to pay?

Answer:

- For your local suppliers of primary and secondary packaging, you must ensure that they are registered with the DEA as well as belonging to the relevant registered IWMP. You will be charged R110/ton for the EPR levy on their invoice to you.
- For the imported packaging, you will have to register with the DEA as an importer and subscribe to the relevant IWMP's and contribute as per the table below.
- For the goods imported in wrapped primary or secondary packaging you will have to register with the DEA and subscribe to the relevant IWMP and contribute as per the table below.

Turnover p.a (Rand mill)	Levy Rate (Rand 000's)
R0 – R5	R5
R6 – R10	R25
R11 – R100	R50
R101 - R500	R250
R501 - R1000	R500
R1001 - R50000	R750
R50000+	R1000

9. How do I absorb this cost into my business?

Answer: Our contention is that, as it is a government regulation to belong to an IWMP, the EPR levys associated with this will have to be included into your product costing and recovered in your selling price. Alternatively you have the prerogative to show the EPR levy as a separate line item on your invoice.

10. Is this a fixed levy?

Answer: The EPR levy currently is R110 per ton. Upon completion of the IWMP, the rate per ton required to achieve the IWMP targets will be communicated to all stakeholders.

11. I make Multilayer Products. Do I have to become a member with POLYCO?

Answer: Yes. The Multilayer Packaging forum joined POLYCO in 2015 and will form part of POLYCO's IWMP.

12. What is the recycling levy payable on?

Answer: The recycling levy is payable on all virgin polymer consumed into polyolefin packaging products and is administered on a Rand per ton basis.

13. What happens if I elect not to register with DEA, submit an industry plan of my own, or belong to an approved IWMP?

Answer: The punitive penalties for non-compliance include imprisonment for 15 years or an appropriate fine or both.

14. With whom must I register if I import multiple types of packaging?

Answer: You must firstly register with the DEA. You must then register with the IWMP of the material stream that constitutes the majority of your waste.