



Improving reporting on jobs by PROs and Producers in the EPR system.....



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CONTENTS

Introduction

Purpose of the
EPR
Regulations

EPR monitoring
and reporting
requirements

Aim of the
presentation /
engagement

Employment

POPI Act

Reporting

Conclusion
and lessons
learned



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INTRODUCTION

The Minister of Forestry, Fisheries and the Environment published the Extended Producer Responsibility Regulations on 5 November 2020 in the Government Gazette, in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (the Waste Act), for implementation. The Extended Producer Responsibility (EPR) Regulations were subsequently postponed and amended with a revised implementation date of 5 May 2021.



Paper and Packaging



Electrical & Electronic Equipment



Lighting



Lubricant oil



Pesticides



Portable batteries



PURPOSE OF THE EPR REGULATIONS



1. to provide the framework for the development, implementation, monitoring and evaluation of extended producer responsibility schemes by producers in terms of section 18 of the Act.
2. to ensure the effective and efficient management of the identified end-of-life products; and
3. to encourage & enable the implementation of the circular economy initiatives.



EPR MONITORING AND REPORTING REQUIREMENTS

An annual external performance audit report must be submitted, by the producer, to the department containing the following minimum requirements:

- a) Performance against the published targets.
- b) Breakdown of the allocation of the extended producer responsibility fee.
- c) Performance on all finance matters.
- d) Governance-related matters
- e) Impacts on the environment.
- f) Recommendations in the event of non-compliance.
- g) Status of free riders; and
- h) Number of decent jobs created.**



Written Reports

- Formal Financial Statements
- Tables
- Ratios



Oral Reports

- Conference
- Group Discussions
- Meetings




Visual Reports

- Graphs
- Pie Charts
- Stats
- Bar Diagrams



AIM / GOAL OF THIS ENGAGEMENT

- 
- a) Provide standard definition of employment;
 - b) Highlight EPR reporting challenges on jobs created;
 - c) Indicate EPR reporting requirements on jobs;
 - d) Point out the type of evidence required for jobs created;
 - e) Understanding the POPI Act;
 - f) Specify lawful processing of personal information;
 - g) Promote the use of standard template(s)
 - h) EPR 2022-23 Jobs Assessment Report

Overall, the engagement aims to improve reporting on jobs created by PROs and Producers.



EMPLOYMENT



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Stats SA Employment / jobs definition

Persons **employed** in market production activities are those (**aged 15-64 years**) who during the reference week, even if it was for only one hour, did any of the following:

- a) **Worked for a wage, salary, commission or payment in kind (including paid domestic work).**
- b) Ran any kind of business, big or small, on their own or with one or more partners.
- c) **Helped without being paid in a business run by another household member. Persons helping unpaid in such businesses who were temporarily absent in the reference week are not considered employed.**

Unemployed persons are those (**aged 15–64 years**) who:

- a) Were not employed in the reference week.
- b) Actively looked for work or tried to start a business in the four weeks preceding the survey interview.
- c) Were available for work i.e. would have been able to start work or a business in the reference week.



The reporting must be coordinated by a registered PRO and reported on the DFFE's EPR system.

1) What type of job or employment is reported on the EPR system and by whom?

New jobs or employment opportunities refer to positions created and added during the reporting period under consideration. This includes roles created by the PRO, as well as those generated by recyclers or scheme members who contribute to the waste sector or are integrated into the value chain. Additionally, jobs held by waste pickers or collectors affiliated with or registered under any recycler or buy-back Centre affiliated with the scheme are also included in this reporting. In the context of the EPR scheme, reported jobs include both direct and indirect positions **created because of the scheme's activities.**

Direct jobs within the EPR Scheme are employment opportunities that are directly created and offered by the scheme. These positions are typically within the organization's structure and involve roles such as administrative staff, program coordinators, or other personnel directly employed by the EPR Scheme to manage its operations and initiatives.

Indirect jobs refer to employment opportunities that are a consequence of the EPR scheme's activities and are intricately linked to the EPR value chain. These jobs may not be directly employed by the EPR scheme but are sustained due to its operations.



FREQUENTLY ASKED QUESTIONS

1. What happens if for one employment opportunity there we multiple resignations or terminations?
2. Is filling a vacant job regarded as **creating a new job?**
3. Does the definition of employment cover Waste Pickers who are non-South African, documented or undocumented?
4. Is the list of Waste Pickers supported sufficient (list without evidence)?
5. What is the difference between a job and a head count?
6. According to the POPI Act, I am not obliged to provide people's identity documents to a third party.
7. Last year I was on a contract and reported as such, however, this year I am permanent. Was employment created or not, keeping in mind that everything else stays the same except that employment status changes from temporary to permanent
8. Does dual roles and responsibilities count as two jobs or one job created.



Protection Of Personal Information Act



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PROTECTION OF PERSONAL INFORMATION



The POPI Act (Act No. 4 of 2013) aims to implement the right to privacy enshrined in the South African Constitution by **protecting individuals' data from misuse. The law defines strict guidelines on how organizations must collect and process personal data.**



The information provided to DFFE is safe. The POPI Act outlines strict guidelines lines on how responsible parties should collect and process personal information.



AUDITOR-GENERAL
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The Auditor General of South Africa (AGSA) is the only body legally required to audit and report on how the government spend taxpayers' money. AGSA annually prepares audit reports for all ministries, public entities, municipalities and state institutions.



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The mission of DPME is to develop and coordinate evidence-based planning, monitoring and evaluation of developmental outcomes and impact.



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DFFE adheres to all eight conditions for the lawful processing of data as outlined in Section 4 (1) of the POPI Act.



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Section 4 Lawful processing of personal information

The conditions for the lawful processing of personal information by or for a responsible party are the following:

- 1) Accountability - the responsible party (DFFE) must ensure that the conditions for lawful processing of personal information and all the measures that give effect to such conditions, are complied with at the time of the determination of the purpose and means of the processing and during the processing itself.
- 2) Processing limitation - personal information must be processed lawfully and in a reasonable manner that **does not infringe on the privacy of the data subject**.
- 3) Purpose specification - personal information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the responsible party.
- 4) Further processing of personal information must be in accordance or compatible with the purpose for which it was collected in terms of section
- 5) Information quality – the responsible party must take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary.
- 6) Openness – the responsible party must maintain the documentation of all processing operations under its responsibility
- 7) Security safeguards - the responsible party must secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organizational measures to prevent—loss of, damage to or unauthorized destruction of personal information; and unlawful access to or processing of personal information.
- 8) Data subject participation - a data subject, having provided adequate proof of identity, has the right to—request a responsible party to confirm, free of charge, whether or not the responsible party holds personal information about the data subject;



Reporting Compliance



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REPORTING REQUIREMENTS ON THE NUMBER OF JOBS CREATED



1. Reporting on the number of decent jobs created is mandatory.
2. Use of the provided template is compulsory
3. Avoid uploading the PDF document to the folder allocated for jobs
4. Avoid uploading a Word document to the folder allocated for jobs.



REPORTING SNAPSHOT: EPR SYSTEM

The screenshot shows a PowerPoint slide titled "REPORTING SNAPSHOT: EPR SYSTEM". The slide content is a browser window displaying the EPR System interface. The browser address bar shows "https://sawic.dffe.gov.za/SAWIC/epvreports". The interface includes a sidebar with "EPR Dashboard", "Administration", "Maintenance", "Transaction", "Settings", and "Reports". The main content area shows a "Report Details" page with the following sections:

- Covers: PRO details**
- Jobs report:** Click on the download icon for Jobs Report. Includes an "Export to Excel" button.
- Covers: Product(s) target(s)**
- Uploads:**
 - Annual report
 - **Job report**

The table below shows the upload details:

Document	Uploaded on	Download
Annual report		
Job report		



REPORTING SNAPSHOT: TEMPLATE



A **standardized template** provides a consistent and comprehensive way to collect and submit information. In addition, using a standard template avoids ambiguity, inconsistencies and incompleteness. A standard template facilitates the verification and validation of information because they are easier to track, test and evaluate.

If jobs were created the spreadsheet will be populated as per this example.

No.	Name & Surname	Gender	ID/ Passport number	Cell/ Phone number	Race	Nationality	Disability	Occupation	Company/ Sub-contractor	Main Economic activity	Evidence
1	Victor Mashabela	Male	7505255570884	0828880243	African	South Africa	None	Sales and Marketing Assistance	ABC	Recycling	
2	Gareth White	Male	7505255550886	066215888	African	South Africa	None	Server	ABC	Recycling	



1. Ignore this reporting requirement
2. Use your template
3. Ignore instructions
4. intentionally avoid attaching evidence

No jobs were created, populate N/A as illustrated in this example.

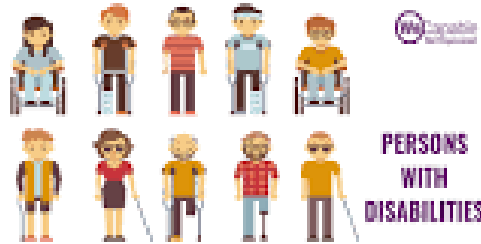
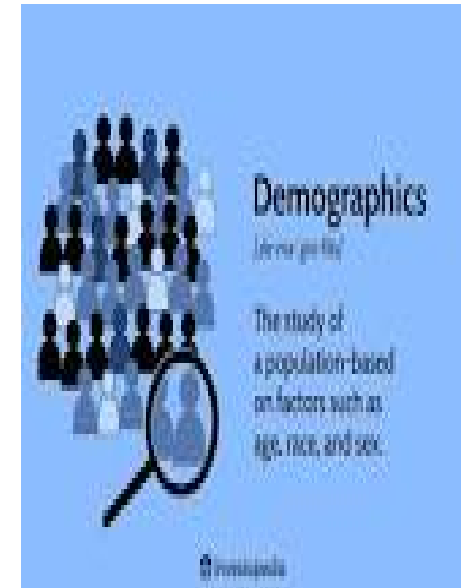
No.	Name & Surname	Gender	ID/ Passport number	Cell/ Phone number	Race	Nationality	Disability	Occupation	Company/ Sub-contractor	Main Economic activity	Evidence
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	



REPORTING SNAPSHOT: TEMPLATE CON'T

Number of work opportunities disaggregated by youth status, women and people with disabilities.

	Number Jobs Created	Women	Youth (18 - 34 years)	Men	Persons Living with Disability (PLWD)	Jobs to be advertised
ABC recyclers	22	12	10	10	2	4
XYZ Manufacturers	8	8	6	6	0	0
TOTAL	30	20	16	10	2	4

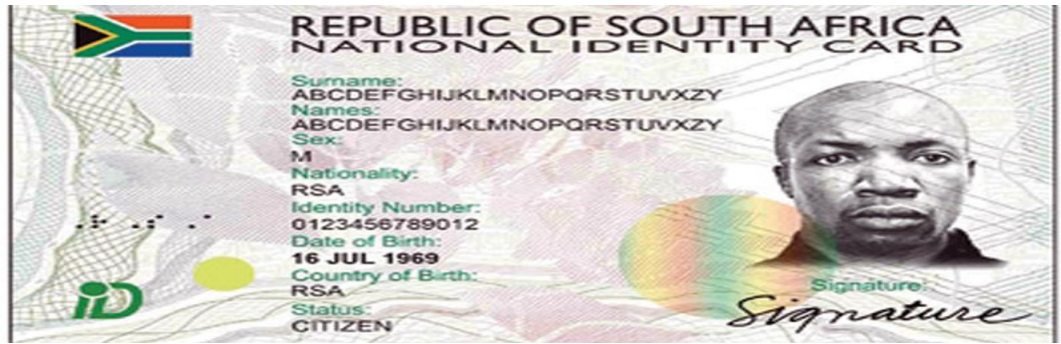


Reporting on the selected demographics of the country.



SUBMISSION OF EVIDENCE ON THE SYSTEM

meaning of
evidence



Any other appropriate evidence



REPORTING CHALLENGES



THE MAIN CHALLENGE IS THE LOW OR NON-REPORTING OF JOBS CREATED BY PROS ON THE EPR SYSTEM. THIS CHALLENGE CAN POTENTIALLY UNDERMINE THE IMPACT OF SEC. 18 ON THE WASTE ECONOMY.

Some of the challenges for reporting PROs include

1. EVIDENCE NOT PROVIDED ON THE SYSTEM



2. PROS NOT USING THE TEMPLATE PROVIDED.



3. CLARIFICATIONS ON THE JOBS TRACKED (I.E., IS IT THE PRO JOBS OR THE RECYCLER'S JOBS FORMING PART OF THE SCHEME).



4. DECISION ON WHETHER TO INCLUDE INFORMAL JOBS (I.E., WASTE PICKERS) AS INDIRECT JOBS OR NOT.



$$s^2 = \frac{1}{n} \sum (x_i - \bar{x})^2 \quad s^2 = \frac{1}{n-1} \sum (x_i - \bar{x})^2$$

$$\bar{x} = \frac{1}{n} \sum x_i \quad \sigma = \sqrt{\frac{1}{n} \sum (x_i - \bar{x})^2} \quad \chi^2 = \sum \frac{(O_i - E_i)^2}{E_i}$$

$$s_x = \sqrt{\frac{1}{n-1} \sum (x_i - \bar{x})^2} \quad P(x) = \frac{1}{n} \sum_{i=1}^n f_i$$

$$\hat{y} = a + bx \quad \mu = np \quad z = \frac{x - \mu}{\sigma} \quad \sigma = \sqrt{np(1-p)} \quad \mu = \frac{1}{n} \sum x_i$$



Statistics

$$b = r \frac{s_y}{s_x} \quad a = \bar{y} - b\bar{x} \quad \hat{p} = \frac{x_1 + x_2}{n_1 + n_2} \quad \bar{X} = \frac{x_1 + x_2 + x_3 + \dots + x_n}{n}$$

$$s_y = \frac{\sigma}{\sqrt{n}} \quad H_0: p = p_0 \quad SE = \sqrt{\frac{\hat{p}(1-\hat{p})}{n}} \quad z = \frac{\hat{p} - p_0}{\sqrt{\frac{p_0(1-p_0)}{n}}}$$

$$SE = \sqrt{\frac{\hat{p}_1(1-\hat{p}_1)}{n_1} + \frac{\hat{p}_2(1-\hat{p}_2)}{n_2}} \quad S = \sqrt{\frac{1}{n-2} \sum_{i=1}^n (y_i - \hat{y}_i)^2}$$

$$P(A/B) = P(A) + P(B) - P(A, B)$$

$$P = 1 - P(A^c) \quad CI = (\hat{p} \pm z^* \cdot SE)$$



$$\binom{n}{k} = \frac{n!}{k!(n-k)!}$$



JOBS CREATED / SUSTAINED

14 934 jobs created

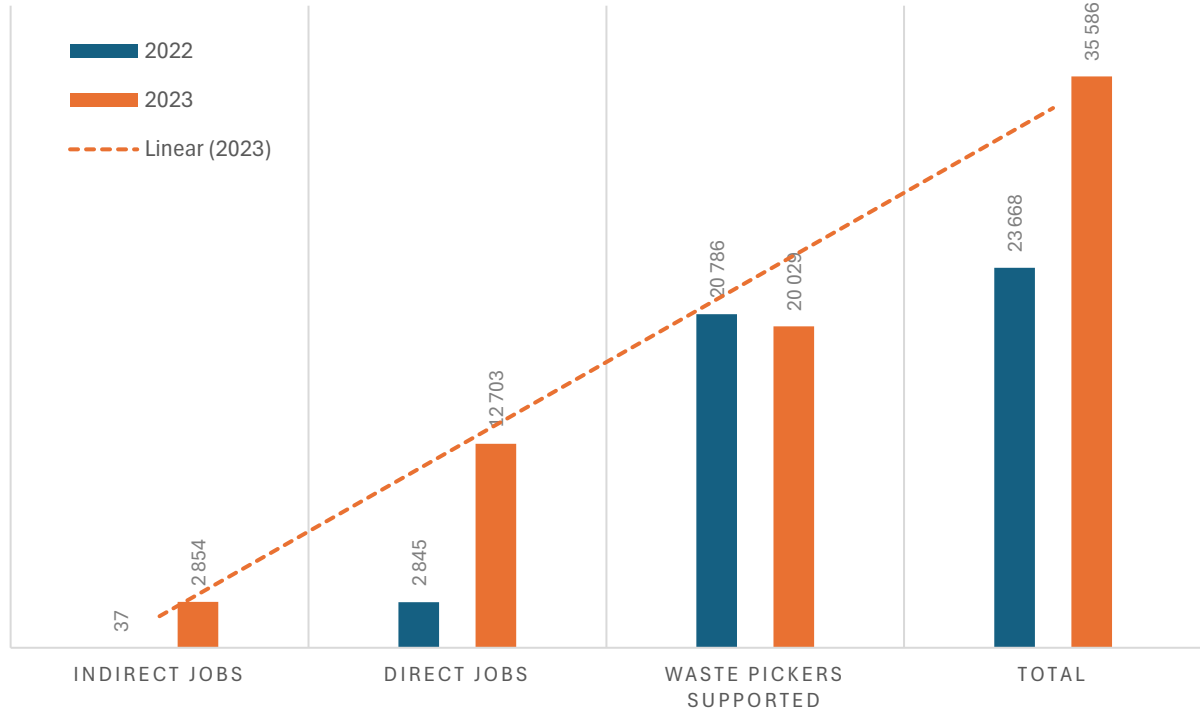


203 jobs created

Waste Bureau

SOUTH AFRICA

420 jobs created

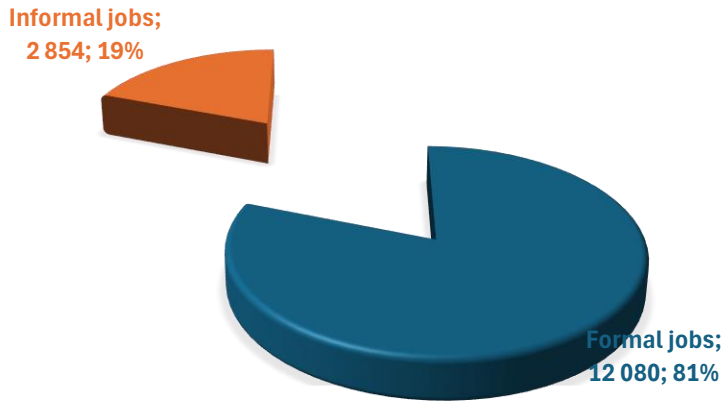


There is significant growth in the number of jobs created or supported by PROs and producers in 2023 compared to 2022. However, the number of waste pickers supported declined during the same period, possibly indicating their integration.

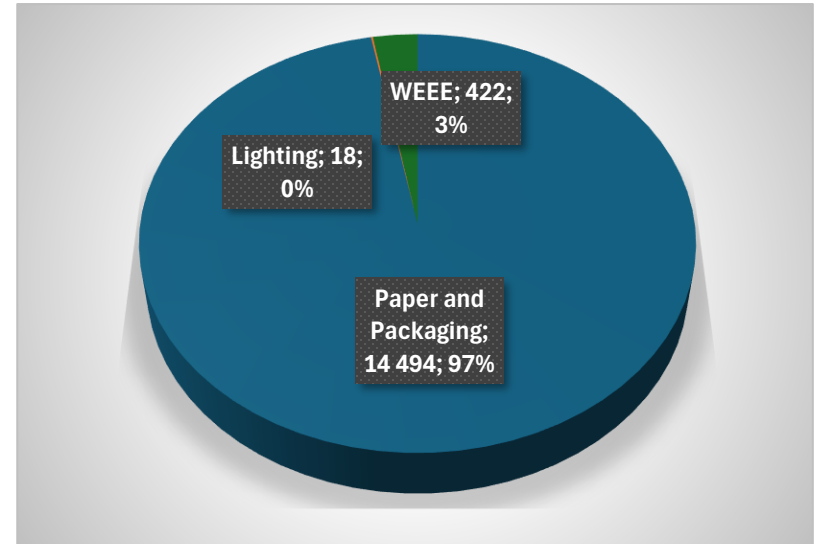


Types of employment reported on the EPR system

Employment created in the formal or informal sector Employment created by waste stream / product



Of the 14,934 total jobs recorded during the 2023 analysis of Producer Responsibility Organizations (PROs) annual reports, 12,080 (81%) were formal jobs whilst 2,854 (19%) were informal jobs.



The paper and packaging as well as the Electrical and Electronic Equipment (WEEE) sectors accounted for 97% (14,494) and 3% (422) of the total jobs created during 2023, respectively. NB, PROs that run schemes for multiple wastes reported aggregate jobs instead of jobs per waste stream.



RECAP

Ways of improving reporting on JOBS

1. Understanding challenges or gaps: some of the challenges include:

a. No reporting



b. Non-use of template



c. Evidence not provided



2. Benefits of minimizing or eradicating these challenges include:

a. Reporting compliance



b. Harmonized reporting



c. Why evidence?

- Proof that jobs were created
- Auditing reporting requirement

3. Future Reporting

- ✓ Reporting compliant always
- ✓ Reporting timeously
- ✓ Attaching correct documents
- ✓ Use relevant reporting templates
- ✓ Submission of relevant evidence
- ✓ More user-friendly system
- ✓ Improved and sustained working relationship with DFFE



THANK YOU!

Mr. Casment Mahlwele

Branch: Chemicals & Waste Management

Chief Directorate: Chemicals & Waste Economy Programme Coordination

Department of Forestry, Fisheries and the Environment

Tel: 012 399 9291 | Mobile: 071 508 7280

Email: cmahlwele@dffe.gov.za

Website: <http://www.environment.gov.za>

Address: The Environment House, 473 Steve Biko Road, Arcadia, Pretoria, 0083

Thank You

