

03 March 2026

The Director-General: Forestry, Fisheries and the Environment
Attention: Mr T. Magomola
Director: Chemicals and Waste Policy, Monitoring and Evaluation
Environment House
473 Steve Biko Road
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By email: TMagomola@dffe.gov.za
CC: MNevuvha@dffe.gov.za

Dear Mr Magomola

SUBMISSION OF COMMENTS ON THE *DRAFT NATIONAL WASTE MANAGEMENT STRATEGY 2026*

AfriForum hereby submits its formal comments on the *Draft National Waste Management Strategy (NWMS 2026)*, as published under Government Notice 6972 in *Government Gazette* 53894 of 19 December 2025.

AfriForum is a non-profit company with registration number 2005/042861/08, registered as such in terms of the Company Laws of the Republic of South Africa, with its principal place of business at 58 Union Avenue, Kloofsig, Centurion, Gauteng.

1. Introduction and public interest

- 1.1. AfriForum welcomes the opportunity to comment on the *Draft NWMS 2026*.
- 1.2. Waste management is not an abstract policy issue. It directly affects public health, environmental integrity, groundwater protection, property values, municipal finances and the daily lived experience of communities across South Africa. The collapse of landfill airspace in several metropolitan areas, persistent illegal dumping and widespread non-compliance with licensing requirements illustrate that waste management has become a systemic service delivery crisis.
- 1.3. AfriForum is actively involved in environmental oversight through annual landfill compliance audits, community recycling and refuse removal initiatives, engagement with municipalities and the identification of illegal dumping sites. The *Draft NWMS 2026* is therefore of direct and practical relevance to our members and the broader public.

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Registration number: 2005/042861/08 • **NGO number:** 054 - 590

1.4. This submission is offered constructively. Our objective is to improve the Draft NWMS so that it delivers measurable improvement rather than repeating the shortcomings of previous iterations.

2. The central problem: implementation, not policy design

2.1. South Africa does not suffer from a shortage of policy frameworks. The National Environmental Management: Waste Act 59 of 2008, the National Waste Management Strategy 2011, the National Waste Management Strategy 2020, the Municipal Waste Sector Plan 2011, and the Operation Phakisa chemicals and waste economy initiatives collectively provide an extensive regulatory and strategic foundation.

2.2. The issue is not the absence of alignment with the National Development Plan or the Sustainable Development Goals. Nor has it been a lack of aspirational targets. The persistent difficulty has been implementation, particularly at municipal level. The *Draft NWMS 2026* will only succeed if it confronts this reality directly. Without structural reform to the execution model, including enforceable accountability mechanisms, clear funding pathways and embedded economic incentives, the *Draft NWMS 2026* risks becoming a restatement of well-intentioned objectives without measurable operational impact.

3. The role of the private sector: empirical evidence of existing capacity

3.1. A central weakness of the *Draft NWMS 2026* is its execution model. While it correctly recognises the private sector as a stakeholder, it does not fully internalise the empirical reality that much of South Africa's recycling work is already being delivered by private industry, often despite municipal dysfunction rather than because of municipal support.

3.2. Plastics SA's 2024¹ recycling and consumption report provides objective industry data that materially informs this discussion. According to the report, South Africa's mechanical plastics recycling rate reached 28,4% in 2024, which places the country above the global average and ahead of many developed economies in mechanical recycling performance. Furthermore, total plastics recycled amounted to 471 000 tonnes in 2024, continuing a steady upward trend over the past five years.

3.3. More significantly, recycle consumption has increased by 67% over the past decade, far outpacing the 18% growth in virgin polymer consumption during the same period.¹ Circular plastics content in new products has risen to 22%, compared

¹ Plastics South Africa. 2026. *South Africa used more recycled plastics in 2024 as recycling rates improved: Revised 2024 plastics recycling and consumption figures*. Available at https://www.plasticsinfo.co.za/wp-content/uploads/2026/02/Revised_2024-Plastics-Recycling-Consumption-Figures_Final.pdf. Accessed on 20 February 2026.

to 16% a decade ago. These figures demonstrate sustained industrial investment, expanding local reprocessing capacity, and tangible movement toward circularity.

- 3.4. Crucially, this performance has occurred despite severe structural weaknesses in municipal waste management systems. The report¹ highlights that 36% of households still lack regular waste removal services, and that recycling growth is increasingly constrained by contaminated waste streams, poor collection systems and insufficient separation at the source. Valuable recyclable material is therefore routinely lost to landfill because municipal systems fail to deliver clean, consistent feedstock to recyclers.
- 3.5. The policy implication is clear: Recycling capacity is not the primary constraint in South Africa's waste economy. Industrial absorption capacity exists; market demand for recyclate exists; and end-markets for recycled plastics are diverse and expanding. The binding constraint is municipal collection reliability and waste stream quality.
- 3.6. In this context, the *Draft NWMS 2026* should not be structured around a state-centric execution model that assumes that municipalities will drive circular transformation. On the contrary, it should explicitly create an enabling policy environment that expands and incentivises private sector participation. This includes regulatory certainty, tariff reform mechanisms, facilitation of private collection services and financial incentives that reward verified diversions from landfill-based schemes.
- 3.7. The empirical evidence demonstrates that measurable recycling progress follows where market incentives operate and operational efficiency is required. A modern waste strategy must therefore shift from positioning the government as the primary executor to positioning the government as regulator, enabler and enforcer, while allowing private actors to scale solutions within a stable and predictable policy framework.

4. Repetition of diversion targets without structural reform

- 4.1. The *NWMS 2020* set a target of 45% diversion from landfill within five years (i.e., by 2025). The *Draft NWMS 2026* now sets a 40% diversion target over a similar timeframe, despite current diversion levels that remain far below the previous target.
- 4.2. The difficulty is not that targets are ambitious. Ambition is necessary. The difficulty is that the same targets are being restated without a materially different implementation framework. Unless the institutional weaknesses that undermined *NWMS 2020* are addressed, which include enforcement capacity, funding clarity

and accountability mechanisms – simply repeating diversion percentages is extremely unlikely to alter outcomes.

5. The missing economic conversation

- 5.1. Waste management is fundamentally an economic system. Recycling will expand where it is economically rational to do so.
- 5.2. The *NWMS 2026* does not sufficiently embed economic incentives that would allow private sector innovation to scale. In particular, municipalities should be enabled and encouraged to implement tariff rebates, rate reductions or other financial incentives for households and businesses to consequently encourage their participation in private recycling services or verified diversion initiatives.
- 5.3. Without tangible economic incentives that are established at national policy level, local governments are unlikely to introduce such mechanisms independently. A strategy is only as strong as the resources and institutional capabilities that are deployed for its execution. At present, the government's executive capacity is uneven and, in many municipalities, demonstrably weak.
- 5.4. A more resilient model would create a policy environment in which private sector participation is not merely welcomed in principle but actively incentivised in practice.

6. Sequencing: Foundational stability before advanced circularity

- 6.1. The *Draft NWMS 2026* strongly emphasises circular economy principles, zero non-residual waste to landfill, organic waste diversion and waste-to-energy technologies. These are legitimate long-term objectives. However, advanced circular economy strategies cannot be implemented successfully in the absence of reliable basic waste services. Regular collection, accurate waste quantification, compliant landfill operation and enforceable reporting mechanisms must form the foundation.
- 6.2. In governance terms, municipalities must first demonstrate sustained compliance in core waste collection and landfill management functions before they can be expected to implement more complex technological or circular economy interventions. Without this sequencing, advanced strategies risk failing due to weak foundational systems.

7. Pillar 4: Compliance and enforcement

- 7.1. Pillar 4 recognises the need for strengthened compliance monitoring and enforcement. This acknowledgement is welcome.

- 7.2. However, the draft does not sufficiently specify how enforcement capacity will be expanded, funded and institutionalised; nor does it introduce clearly defined and enforceable consequences for persistent non-compliance.
- 7.3. AfriForum's annual landfill audits consistently reveal systemic non-compliance across municipalities, with limited improvement year after year. A culture of non-compliance has become entrenched in waste management.
- 7.4. If the *Draft NWMS 2026* does not introduce measurable accountability mechanisms – including public performance reporting and conditional funding that are all linked to compliance – the enforcement pillar will remain aspirational.

8. The implementation plan: Ambitions v. actions

- 8.1. Several interventions that are listed in table 11 and chapter 8 of the *Draft NWMS 2026* are framed as objectives rather than operational actions. Statements such as “increase re-use and recycling rates” and “enhance capacity” describe outcomes and not mechanisms. An effective implementation framework requires the clear identification of responsible authorities, funding sources, measurable milestones, reporting intervals and consequences for non-performance.
- 8.2. Furthermore, although the private sector and civil society are identified as key partners in the narrative sections of the *Draft NWMS 2026*, they are largely absent as formal executing agents within the implementation plan. This disconnect weakens the strategy's operational realism.

9. Lessons from municipal practice

- 9.1. The City of Cape Town Metropolitan Municipality's *Waste Strategy 2025* demonstrates the value of realistic baselines, transparent reporting and structured public-private integration. The national *Draft NWMS 2026* would benefit from adopting similar operational clarity and sequencing, particularly in relation to infrastructure planning and performance monitoring.

10. Constructive proposals

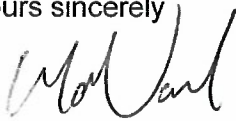
- 10.1. AfriForum proposes that the final NWMS 2026
 - 10.1.1. explicitly enables municipal tariff rebates or incentive frameworks for private recycling participation.
 - 10.1.2. expands formal roles for private sector actors within the implementation plan.
 - 10.1.3. establishes a national compliance performance dashboard.

- 10.1.4. links conditional grants to measurable compliance indicators.
- 10.1.5. prioritises the stabilisation of basic services before advancing complex circular economy initiatives.
- 10.2. AfriForum is prepared to contribute constructively through formalisation of its landfill audit methodology as a capacity-building tool, participation in compliance workshops, assistance with illegal dumping monitoring and collaboration on pilot projects in urban as well as rural contexts.

11. Conclusion

- 11.1. The *Draft NWMS 2026* contains sound environmental principles and a coherent strategic framework. However, its success will depend entirely on whether it confronts the underlying institutional realities that undermined previous strategies.
- 11.2. The Plastics SA data demonstrates that the private sector is already capable of delivering significant recycling performance under constrained conditions. The central weakness lies in municipal execution and insufficient economic incentives. For the *NWMS 2026* to succeed, it must move beyond aspirational targets and create a practical, incentive-driven and enforceable framework that recognises existing capacity and corrects institutional deficiencies.
- 11.3. AfriForum respectfully requests the opportunity to appear before the relevant Parliamentary Portfolio Committee to present these considerations verbally and to engage further with DFFE in strengthening the final *NWMS 2026* .
- 11.4. We trust that our comments will receive consideration. If the Department requires any clarification in respect of the submission, we remain available to engage further.

Yours sincerely



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