

**Attention: Mr Jeremia Sibande, The Director General: Forestry, Fisheries and the Environment; and Dion Travers George, Minister of Forestry, Fisheries and the Environment**

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28<sup>th</sup> January 2025

Dear Mr Sibande and Minister George

**RE: Proposed Amendments to EPR Regulations**

On behalf of the PRO Alliance, I wish to extend our gratitude for granting the extension to submit comments on the proposed amendments to the Extended Producer Responsibility (EPR) Regulations until 31 January 2025.

Please find attached the consolidated comments on the proposed regulatory amendments, representing the areas where alignment exists among our PRO members. It is essential to note that this submission is not intended as a substitute for the individual comments submitted directly by our members to the DFFE. We request that this caveat is acknowledged to ensure that all perspectives are independently considered in your deliberations.

For reference, the PRO Alliance represents the following members:

- Petco
- Polyco
- Metpac-SA
- Circular Energy
- The Glass Recycling Company
- Fibre Circle
- eWASA

We firmly believe that the success of the proposed regulatory amendments depends on a collaborative approach to enable faster and more efficient adoption. The PRO Alliance welcomes the opportunity to facilitate stakeholder engagement regarding EPR regulation, ensuring that all comments be given consideration and practical solutions are co-created.

We request an opportunity for oral representation to be made in respect of the proposed amendments, post the submission deadline.

The PRO Alliance remains committed to supporting the Department's objectives for sustainable waste management and environmental stewardship. We look forward to further collaboration on this important regulatory process.

Should you require further clarification or additional input, please do not hesitate to contact me.

Yours sincerely,



Bhavesh Patel  
Executive Director  
PRO Alliance

**Attachment: Consolidated Comments on Proposed EPR Amendments**