

1. Are Generators Complying with the Waste Act?







As a hazardous substance, used oil is strictly governed by environmental laws and its storage and disposal has to meet the requirements of the Waste Act. Large companies are generally well-informed and compliant, but there are many SMME's that don't meet the requirements properly. ROSE licensed collectors have a pivotal role to play in helping ensure that the generators they collect from are informed and compliant.

SAWIS

One of the key requirements is that any entity generating in excess of 20kg of used oil per day, is required to register on the South African Waste Information System (SAWIS). Once registered, the generators need to submit their figures every 90 days (quarterly) into the SAWIS. The information needs to be based on actual volumes and not estimates. The following information needs to be submitted and retained by the waste generator for five years, to be produced for inspection, when required:

- A. the month and year to which the information applies;
- B. Category of waste; HW07 Waste Oils 01 Waste oil
- C. Source from which waste comes
- **D.** The quantity of waste reported in tons.

Hazardous Waste Manifest

Oil generators have to store their used oil for responsible collection by a ROSE licensed and registered collector, who will come and remove the oil and take it to be recycled in an environmentally compliant and safe manner. According to the Waste Act, the collector is required to issue the generator with a safe disposal certificate.

This safe disposal certificate issued by ROSE registered collectors also acts as a Hazardous Waste Manifest, thereby fulfilling the requirements of reporting by law, the same information can be used on SAWIS.

Generators need to understand the importance of using an oil collector that is licensed and registered by ROSE, as this ensures that the collectors are compliant with all waste transportation legislation and are strictly managed and audited – further ensuring their compliance as a waste generator.

Generators are required to complete the following information on a Hazardous Waste Manifest, for every load collected. This document tracks the used oil from cradle to grave and offers a clear snapshot on how it has been managed and includes:

- A unique consignment identification number;
- The generator's contact details, including the contact person, physical and postal address, phone and fax number and email address;
- The physical address of the site where the waste was generated;
- An emergency contact number;
- The origin/source of the waste (how it was generated);
- A description of the waste (waste classification and waste category)
- The physical nature/consistency of the waste (liquid, solid, sludge; pump-able, non-pump-able);
- The quantity of waste;
- Packaging (bulk, small containers, tank);
- Transport type (tanker, truck, container);
- Special handling instructions;
- The date of collection/dispatch;
- The intended receiver (waste manager).

For more information visit http://sawic.environment.gov.za/



2. ROSE Effectively Improving Compliance

"The ROSE Foundation, with the major lubricants manufacturers, distributors and retailers, has led the initiative in the responsible recycling of used oil for over twenty years, and continues to play a vital ongoing role to ensure compliance within the used oil industry, through a process of auditing, training, equipping and accrediting collectors and processors, in terms of Government legislation," says ROSE's Environmental Advisor, Lihle Mqayi.

"And our efforts are paying dividends – there are over 158 accredited collectors and licensed processors, that we are working with us to ensure compliance in the industry, and this number is growing steadily."

This year ROSE has focused on recruiting small used lubricating oil collectors who had been operating on a "fly-by-night" basis without licenses and not meeting the basic requirements for transporting used oil. The ROSE Foundation assisted these collectors with placarding, operational training, and equipment. Training includes modules on legislation requirements, fire-fighting, first-aid and safety equipment.



Some of the collectors were trained on basic personal finance skills to understand how to manage business finances. ROSE also supplied PPE, Operations Manuals and Waste Manifest books to the collectors once they were accredited.

On an annual basis, ROSE audits all accredited used oil collectors to ensure that they comply with relevant legislation.

ROSE also works closely with main metro municipalities such as City of Cape Town, City of Johannesburg and Ekurhuleni, to ensure collectors' compliance with the applicable bylaws.

The valuable role of the ROSE Foundation has been recognised by the key stakeholders in the used lubricating oil value-chain, including government and the various industrial sectors. Various industry associations have complimented ROSE on its work in empowering and equipping emerging SMEs in the used lubricating industry.

ROSE continually engages with the local and national government to pass more enabling laws so that the emerging SMEs will be able to comply more easily and in turn create employment opportunities.

The ROSE Foundation is the only industry-based organisation that has met and exceeded the Extender Producer Responsibility requirements through a series of well-structured initiatives and programmes. Neighbouring countries continue to seek advice from the FOSE Foundation about managing used lubricating oil recycling within their borders.

3. Meet the Old Oil Boys



Old Oil Boys was founded by Juan Stander in 2012 and as a relatively young business within the industry, the organisation has grown from collecting 20 000 litres a month, to collecting over 500 000 litres a month.



"We decided to start the company to make a difference about the environmental impact of used oil," says Juan Stander. "We began by going to workshops and placing containers for their waste oil. We now also take away gearbox oil, hydraulic oil as well as used engine oil."

"Old Oil Boys are passionate about what we do – our mission is to sustain a green environment - and we endeavour to try and educate people regarding the negative impact that waste oil has on the environment, and to explain to them why it is best to have their waste oil collected and processed."

Old Oil Boys reiterates what many ROSE registered collectors have said when asked about the current legislation governing the used oil industry: they welcome the rules and are grateful for the audits and checks in place by the ROSE Foundation which keep the industry in line with government imposed legislation and in turn, protect our environment.

Old Oil Boys collects used oil in Limpopo, Gauteng, Mpumalanga and North West.

