



FREQUENTLY ASKED QUESTIONS (FAQs) RELATED TO SMALL PLASTIC LUBRICANT PACKAGING

1. What is meant by small plastic lubricant packaging?

Small plastic lubricant packaging refers to plastic bottles and buckets that are 25L and less in size. These plastic containers are used for packaging of new lubricants that are sold to the consumers via Forecourt, Retail, and Workshop channels

2. What is the legal way to dispose the plastic lubricant packaging after use?

Every generator has the legal responsibility in terms of the Waste Act and local bylaws to safely dispose the plastic lubricant packaging via accredited collectors e.g. ROSE accredited collectors. The generator must also separate the used plastic lubricant packaging from any other waste to avoid cross contamination. Once the collection has been completed the generator must ask for the safe disposal certificate from the collector and file it as the proof of compliance.

3. Who do I contact to collect my plastic lubricant packaging for disposal?

Please contact the ROSE Accredited collectors using this link:
<https://rosefoundation.org.za/associated-waste/recycling-plastic-bottles-and-cans/>

Alternatively, the ROSE office: 021 4487492

4. How will I know the accredited collector from the non-accredited one?

The ROSE accredited collector will produce their valid accreditation certificate that you can scan to verify the validity. You can also contact the ROSE Office for confirmation: 021 448 7492. The accredited collector will also issue you with the safe disposal certificate after the collection has been completed. However, non-accredited collectors will have no documentation that verifies their accreditation status nor credible safe disposal certificate to issue to you as the generator.

Giving your waste (used plastic lubricant packaging) to non-accredited collectors will compromise your compliance status and your waste may be illegally disposed.

5. Will I be paid for disposing the plastic lubricant packaging via the accredited collectors?

Accredited collectors are independent companies that offer waste management services to the generators of waste. Yes, there will be an applicable collection fee that you can negotiate with the accredited collector that renders service to your business.

6. What will I be getting from the accredited collectors as a proof of safe disposal?

Accredited collectors will show you their accreditation and issue you with the credible safe disposal certificate

7. What are the plastic lubricants packaging used for?

They are used to contain lubricants before placing them into the market.

8. What type of material is the plastic lubricant packaging made of?

Small plastic lubricant packaging is made of plastic material called Polypropylene (PP) Rigid and Highly Density Polyethylene (PE – HD) Rigid

9. What are the environmental risks associated with poor disposal of plastic lubricant packaging?

Poor disposal of plastic lubricant packaging poses significant environmental risks due to the bottles' plastic composition and the toxic oil residue they contain. These hazards include the contamination of water and soil, the proliferation of microplastics and their associated dangers, and air pollution from improper incineration.

10. What is the price of the plastic lubricant packaging per kg when sold to the Buy-Back Centre or the Recycler?

Each Recycler or Buy-Back Centre has its own price it pays per kilogram of plastic waste to the collectors. The prices are also affected by the quality and quantity of waste delivered by the collector.

11. What are the challenges associated with the recycling of the plastic lubricant packaging?

Lubricant packaging is unique in that it requires more effort in cleaning to remove any residual oil before it can be mixed with other material for recycling. Many plastic recyclers do not have proper equipment to handle plastic lubricant packaging. Hence, the market is not widely open for lubricant packaging as compared to general plastic packaging e.g. milk bottles.

12. What legislation is applicable to the generators, collectors and recyclers of plastic lubricant packaging?

The South African Constitution (Act 108 of 1996)
Occupational Health and Safety Act (Act 85 of 1993)
National Environmental Management Act (Act 107 of 1998)
National Environmental Management: Waste Act, 2008 (Act 59 of 2008)
National Environmental Management: Waste Amendment Act, 2014 (Act 26 of 2014)
National Waste Information Regulations, 2012
Waste Classification and Management Regulations, 2013
Amendments to Waste Classification and Management Regulations, 2024

13. If I do not comply with the legislation what will be the consequences?

Failure to comply will result in you being fined or be jailed or both. Your company may be fined if found guilty of the non-compliance. Non-compliance will also negatively affect your personal reputation and that of your company.

14. As the brand owner of the lubricants who purchases small plastic lubricant packaging from the producers, do I need to join the ROSE Foundation EPR Scheme for small lubricant packaging?

Yes, you do need to join the ROSE Foundation PRO for small plastic lubricant packaging. Joining the ROSE Foundation will ensure that you part of the Lubricant Brand Owners who are willing to partake in the development of the recycling programs targeted on oily plastic bottles. In addition, you will have visibility of what has been collected and recycled compared to what has been sold into the South African market.

15. Where do I get to register to be the member of the ROSE Foundation EPR Scheme for small lubricant packaging?

Please contact the ROSE Foundation offices via email: info@rosefounfoundation.org.za or telephonically: 021 448 7492

Alternatively, download the registration form using this link: <https://rosefoundation.org.za/about/#membership-application>

16. Who are the parties responsible for paying the EPR levies on locally produced vs imported small lubricant packaging if you are a ROSE Foundation member?

EPR levy for the imported and locally produced small plastic lubricant packaging will be paid directly to the ROSE Foundation by the members. This means the EPR levy will not be indirectly paid via the manufacturers of lubricant packaging.

17. How do we submit our tonnage declaration forms to the ROSE Foundation and pay the EPR levies for small lubricant packaging?

Tonnages for small plastic lubricant packaging will be declared using the template that will be sent directly to the members. Once the declaration has been completed it must be sent to the ROSE office via email: accounts@rosefoundation.org.za The invoice will be generated and sent to the members for payment.

18. Do I pay levies on packaging for export products?

No, the export products do not require payment of EPR levies.

19. What is PP Rigid?

PP Rigid is a stiff, tough, and durable form of polypropylene (PP), a versatile thermoplastic known for its high chemical resistance, impact strength, and ability to withstand high temperatures. Its rigid nature makes it ideal for applications where it needs to maintain its shape and resist deformation, such as in automotive parts, food containers and medical equipment.

20. What is PE-HD Rigid?

PE-HD, or High-Density Polyethylene, is a rigid and strong type of plastic known for its durability, chemical resistance, and high strength-to-density ratio. Its rigidity makes it ideal for products like automotive care products, domestic cleaning products, buckets, crates, and drums, where its strength and resistance to wear and chemicals are beneficial.