



## August 2019: Landfill Prohibitions

Interwaste has prepared the following communication in accordance with our continued commitment to raise awareness amongst our customers of changes to waste-related legislation that could have a potential impact on how your waste is managed to ensure ongoing compliance. The imminent implementation of additional ‘landfill disposal prohibitions’, on 23 August 2019, have relevance in this regard.

Section 5 (1) (a - u), as well as Section 5 (2) (a - c), of the [National Norms and Standards for the Disposal of Waste to Landfill](#) (GN R 636 of 23 August 2013) provides for a non-exhaustive list of waste types that are prohibited from disposal to landfill in South Africa. These prohibitions / restrictions are indicative of Government’s increasing appetite to drive the diversion of waste from landfill through reasonable legislative and other means. The referenced prohibitions are being phased in over an effective period of 15 years from the date of the promulgation of the above mentioned Norms and Standards and associated [Waste Classification and Management Regulations](#) (GN R 634 of 23 August 2013).

2018	2019	2021
<ul style="list-style-type: none"><li>• Re-usable, recoverable or recyclable used or spent solvents</li><li>• PCB waste (&gt;50mg/kg) or 50ppm</li><li>• Waste tyres: Quartered</li><li>• Disposal of garden waste: 25% diversion from baseline</li><li>• Type 1 waste that has been treated with Pre-classified general waste</li><li>• Hazardous waste with pre-classified general waste</li><li>• Disposal of Type 4 waste with any other waste (unless part of treatment)</li></ul>	<ul style="list-style-type: none"><li>• Hazardous waste with a calorific value of &gt;20MJ/kg</li><li>• Liquid wastes</li></ul>	<ul style="list-style-type: none"><li>• POPs pesticides listed under Stockholm Convention</li><li>• Other batteries</li><li>• WEEE – other.</li><li>• Brine or waste with a high salt content (TDS &gt; 5%)</li><li>• Macro encapsulation of waste.</li></ul>

**Figure 1: Diagram showing the effective time-lines for the phased implementation of ‘landfill prohibitions’ under the National Norms and Standards for the Disposal of Waste to Landfill – effective 23 August each year.**

Notwithstanding the prohibitions that have already come into force (Figure 1), Interwaste wishes to bring to the attention of our valued customers, an additional two (2) landfill prohibitions which will become effective on 23 of August 2019, as follows:

### 1. Liquid Waste –

- I. Waste which has an angle of repose of less than 5 degrees, or becomes free-flowing at or below 60°C or when it is transported, or is not generally capable of being picked up by a spade or shovel;
- or
- II. Waste with a moisture content of >40% or that liberates moisture under pressure in landfill conditions, and which has not been stabilised by treatment.

### 2. Hazardous waste with a calorific value of >20MJ/kg

For the sake of reference, please find a **non-exhaustive** list of waste streams below, that in Interwaste’s experience, may be subject to the abovementioned landfill disposal prohibitions going forward.

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Liquid Waste	Hazardous Waste with CV >20MJ/kg
Expired / redundant liquid products or raw materials (general or hazardous)	Hydrocarbon / oil contaminated liquids and sludges
Process effluents and liquid wastes not otherwise lawfully discharged to the Municipal sewer	Hydrocarbon / oil contaminated rags, PPE and other general wastes
Oil-water separator sludges and effluents	
Paper and pulp sector sludges / effluent wastes	Expired / redundant hazardous products and raw materials with CV >20MJ/kg (liquid, sludges and solids)
ETP filter-cakes / sludges with >40% remaining moisture	Petro-chemical industry waste(s)
Acidic / caustic process sludges & liquids	Hazardous lubricating and mineral oils
other 'wash water' wastes	Paint sludges / solvent-based wastes

The implications of the above are that any waste(s) conforming to either one, or both, of these attributes cannot be disposed of to any landfill site in South Africa from the 23<sup>rd</sup> of August 2019; irrespective of the Class of that landfill site. Any person generating such waste will need to ensure that such waste is either diverted to an appropriately authorised re-use, recycling or recovery facility and /or lawfully treated to within a specification that then allows for it to be landfilled.

## What are my options as a waste generator?

There are options available to waste generators who produce either of the aforementioned waste types; where this waste is presently disposed of to landfill. These options can be broadly grouped as follows:

1. Potential development and operation of on-site capacity for the treatment of such waste at the waste generator's premises;
- or
2. The diversion of the waste to an appropriate off-site recovery, recycling, re-use or treatment facility.

Interwaste, as a market-leader in the treatment and diversion of waste from landfill, is ready and able to assist our customers through either of the above two avenues. This through our internal capacity / facilities and an extensive professional network within the waste sector. The timing of the abovementioned landfill prohibitions, unfortunately, does not lend itself to the timely development of on-site capacity at this stage (e.g. liquid waste dewatering), but can be investigated as part of a medium- to long-term strategy to optimise your waste management, where appropriate.



Any establishment of on-site waste management capacity also needs to be cognisant of potential legal obligations for the authorisation thereof (as the case may be) through possible waste license application to the Competent Waste Management Authority and supporting EIA process.



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In response to the subject landfill disposal prohibitions in 2013, Interwaste has developed significant capacity over the years for the treatment, recycling, recovery and / or treatment of qualifying wastes at our licensed waste management facilities in South Africa. This internal capacity is predominantly in the form of –

- Liquid / sludge waste treatment and oil recovery through our effluent treatment plant (ETP), suitable for the management of qualifying acids/ caustic liquids and effluents, as well as hydrocarbon contaminated liquids and effluents;
- Recycling of qualifying liquid and hazardous sludge wastes (with CV > 20MJ/kg) through our waste blending platform; which produces a waste derived fuel (WDF) for use as an industrial fuel;
- The recycling of qualifying solid wastes and contaminated general waste with CV > 20MJ/kg (i.e. if hazardous, or otherwise) into refuse derived fuel (RDF), again for use as an industrial fuel; and
- Liquid waste stabilisation at our licensed Waste Management Park, for subsequent assessment and disposal to landfill at the aforementioned facility, once within the required specifications.

In addition to the above, Interwaste has an extensive network of waste management partners across South Africa (and internationally if needs be). Interwaste remain committed to the identification and development of cost effective, lawful, waste management solutions in proximity to our customers. Should you have concerns over the continued landfill disposal of any of your waste streams post August 2019 (or in general), please do not hesitate to contact us toward pursuing potentially viable, geographically suited, landfill alternatives for your waste(s) of concern.

You are encouraged to take a pro-active approach in this regard, and Interwaste is ready and able to partner you on this journey. We trust that you have found this communication informative, and we look forward to assisting you wherever required.



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