

SA Plastics Pact recyclability position statement

Introduction

The South African Plastics Pact (SA Plastics Pact) brings together business, government, Producer Responsibility Organisations (PROs), and civil society to drive a circular economy for plastic packaging in South Africa. Our vision is to keep materials in the economy and out of the environment. A central component of this vision is ensuring that plastic packaging placed on the market is recyclable in practice and at scale.

South Africa's recycling ecosystem is shaped primarily by manual sorting systems, informal collectors, and a concentration of recycling infrastructure in urban centres. Because recyclability is largely determined by market-driven viability, these contextual realities create a landscape in which certain materials are readily recovered for recycling purposes while others are not. Within this environment, recognising a material as recyclable if it meets a 30% threshold, meaning that minimum 30% of that material placed on the market is practically recycled, provides a pragmatic and measurable approach and benchmark. This reflects what is realistically achieved in practice and at scale in South Africa.

This position statement reaffirms the SA Plastics Pact's definition of recyclability and explains the rationale for maintaining a 30% recyclability threshold, ensuring transparency, credibility, and alignment with both local and global standards.

Definition of Recyclability

At its inception, the SA Plastics Pact adopted the Ellen MacArthur Foundation¹ (EMF) definition of recyclability, which focuses on what is actually collected, sorted, and reprocessed within existing systems. Packaging is considered recyclable when it is designed, collected, and processed in ways that ensure it can be successfully recycled into new products at end of life.

This interpretation is consistent with the position of the South African Plastics Recycling Organisation (SAPRO), which emphasises that recyclability must reflect the practical realities of the recycling system. SAPRO notes that packaging should only be considered recyclable when it can be effectively collected, sorted and reprocessed through existing recycling systems, and where there is sufficient market demand for the resulting

¹ Ellen MacArthur Foundation (EMF), 2020, New Plastics Economy Global Commitment.

recyclate. This recognises that recyclability depends not only on technical feasibility, but also on economic viability and demonstrated recycling outcomes.

Recyclability in practice and at scale means:

- In practice: The packaging is effectively collected, sorted, and processed in existing systems within the country.
- At scale: Recycling has been demonstrated across multiple regions representing a significant proportion of the population, ideally including diverse urban and rural archetypes.

The Pact encourages **design for multiple life cycles**, ensuring material choices preserve value at the end of current use and facilitate reintegration into the economy. Material choice for all packaging elements is fundamental to maintain material value as high as possible at end of its current use. For packaging to be recyclable in practice, the material must have sufficient value at end-of-life for collection and resale. It must be recycled into forms usable by manufacturers of new products. **Economic feasibility** is essential to maintain functional recycling streams and to achieve consistent material recovery.

The Pact's targets commit members to design plastic packaging for recyclability and circularity within the South African context. Achieving this requires that claims of recyclability are evidence-based, aligned to infrastructure, and supported by viable end-markets for recyclate. Evidence may include verified recycling rate data, industry recycling surveys, or other credible sources demonstrating that a material is collected, sorted and recycled within existing systems.

The 30% Recycling Rate Threshold

SA Plastics Pact members agreed to adopt a 30% recycling rate threshold to define recyclability in practice and at scale. This aligns with the EMF definition used across the global Plastics Pact Network and provides a pragmatic benchmark based on demonstrated recycling performance within the system.

Rationale

The threshold:

- Distinguishes technical recyclability (a material can be recycled) from practical recyclability (a material is being recycled).
- Ensures that recyclability claims are based on actual collection and processing data, rather than theoretical potential.

- Provides a clear and measurable benchmark for brands and retailers when making recyclability claims.
- Supports credible consumer communication, including the use of On-Pack Recycling Labels (OPRL), where materials meeting or exceeding the threshold may carry a “Recycle” label. Where appropriate evidence exists, OPRL also allows materials on a credible pathway towards the threshold to carry a recyclable designation.

In this context, packaging formats that rely primarily on export markets for recycling would generally not meet the definition of recyclability in practice and at scale within the South African context unless stable and verifiable recycling pathways exist.

Materials approaching the threshold:

The SA Plastics Pact recognises that recycling systems evolve over time and that some packaging formats may be approaching the 30% recycling rate as infrastructure, markets, and collection systems develop. In these cases, materials may be recognised as being on a credible pathway to recyclability, where there is evidence of increasing collection, sorting, or recycling capacity.

This approach ensures that the threshold provides a robust benchmark for recyclability claims while still supporting the continued development of emerging recycling streams.

Consumer guidance:

Consumer guidance should continue to encourage the separation and recovery of materials that are accepted within existing collection systems, even where national recycling rates remain below the threshold. This helps support the growth of recycling systems and prevents materials that are already being recovered from being unnecessarily diverted from recycling streams.

Periodic review:

The SA Plastics Pact recognises that recycling infrastructure, markets, and technologies evolve over time. The application of the recyclability threshold will therefore be reviewed periodically, informed by updated national recycling data, infrastructure development, and changes in recycling markets.

Assessing Recyclability

Recyclability assessments under the Pact are conducted collaboratively, using a combination of qualitative and quantitative data. The process includes:

- Reviewing the Plastics SA annual recycling survey to identify what packaging is collected and recycled nationally.
- Consolidation of member-reported data to evaluate compliance with the 30% threshold.
- Engagement with PROs, South African Plastics Recycling Organisation (SAPRO), and other stakeholders to ensure alignment with infrastructure and market realities.

This process ensures that the definition of recyclability is transparent, evidence-based, and applicable in the South African context.

Alignment with ISO and National Regulations

The South African National Environmental Management: Waste Act's 2020 Regulations regarding Extended Producer Responsibility require producers of identified products, including packaging, to implement environmental labels and declarations in accordance with SANS/ISO 14021 and SANS/ISO 14024. This means that any environmental claims made on packaging must comply with the criteria and verification requirements set out in these standards, ensuring that labels are substantiated and not misleading.

Under SANS/ISO 14021 "recyclable" means that a product or packaging can be collected, separated, or otherwise recovered from the waste stream and reused or processed into a new product through an available recycling programme or facility. This means that a system for collecting and processing the material must already be in place in a reasonable proportion of the market where the claim is made. It must be technically feasible to recycle the material in practice and the recycling system must be reasonably available to the majority of consumers for whom the claim is relevant. If access to recycling is limited (e.g., only in some regions), this must be clearly qualified. If only parts of a package are recyclable, this must be specified.

This standard support the Pact's use of a 30% threshold and help ensure that recyclability claims are credible, verifiable, and meaningful.

Tools and resources

A number of industry tools and guidance documents support Pact members in assessing recyclability, improving packaging design, and communicating recyclability to consumers. These tools serve complementary roles within the packaging design and recycling system.

Assess recyclability within the current system

The Designed for Earth (D4Earth) tool and On-Pack Recycling Labels (OPRL) provide guidance on whether packaging formats are recyclable within existing collection, sorting and recycling systems. These tools support brands and retailers in assessing packaging formats against current recycling infrastructure and determining appropriate recyclability claims and consumer-facing labelling.

Improve packaging design for circularity

The SA Plastics Pact Design for Circularity Guidance supports members in improving packaging design to better align with recycling system capabilities. The guidance highlights design choices that increase recyclability, improve material value at end of life, and support the production of high-quality recycle.

Supporting continuous improvement

Packaging may be recyclable within current systems while still not representing best-in-class design. The SA Plastics Pact Design for Circularity Guidance therefore encourages continuous improvement in packaging design to improve recycle quality and system performance.

Together, these tools provide Pact members with practical resources to assess recyclability, improve packaging design, and align packaging formats with the realities of South Africa's recycling system.

Conclusion

The 30% recyclability threshold adopted by the SA Plastics Pact is a pragmatic, evidence-based standard. It protects consumer confidence, strengthens national consistency, and accelerates investment in a true circular economy for plastics.

By adopting this threshold, Pact members reaffirm their commitment to credible claims, transparent reporting, and practical recycling outcomes, ensuring that plastic packaging works in practice and at scale.