



South African Photovoltaic Industry Association

SAPVIA- Environmental WG Meeting

Date: 25 November 2025

Time: 12:00-13:00

Chairperson: Kakale Munamati

Declaration of Interest and Prevention of Anti-Competitive Behaviour

Participants of all SAPVIA meetings agree not to engage in or discuss the following topics:

- **Price-Fixing** - current or future prices, pricing strategies, or price changes.
- **Market Division** - allocation of customers, suppliers, territories, or market shares, dividing markets by geographic areas or product lines.
- **Collusive Tendering** - bid-rigging, including agreements on who will submit bids or the terms of bids, information about tender processes or strategies.
- **Production and Supply Control** - agreements to limit or control production, supply, or distribution of products or services, capacity, production quotas, or inventory levels.
- **Boycotts** - agreements to boycott or refuse to deal with specific customers, suppliers, or competitors, collective actions against any market participant.
- **Information Sharing** - competitively sensitive information, including sales volumes, market shares, costs, marketing strategies, future business plans, research and development projects, or investment strategies.
- **Exclusionary Practices** - strategies to exclude competitors from the market or to create barriers to entry, exclusive dealing, tying arrangements, or predatory pricing.
- **Anti-Competitive Agreements** - discussions that could lead to anti-competitive agreements, whether formal or informal, conversations that could be interpreted as attempts to coordinate competitive behaviour.

Facilitator	Kakale Munamati (KM)	Attendees: Steffen Schröder (SS) Agreepa Neduvhuledza (AN) Eloise Costandius (EC) Espee Hattingh (EH) Siphumelele Mqadi (SM) Kim Jooste (KJ) Fakazile Thusi (FT) Monique Daniels (MD) Zimbini Nontyi (ZN) Denise G (DG) Jeremiah Sibande (JS) Richard Ndonyana (RN) Nicole Crozier (NC) Dr Rethabile Melmau (RM) Sim Khuluse (SK) Zimkita Bilibana (ZB) Pamela Gama (PG) Sinethemba Mnguni (SM)
Note taker	Thabang Molai (TM)	

Minutes		
1.	Opening	Chairperson
	<p>Welcome and Introduction The chairperson welcomed everyone to the working group meeting and acknowledged attendees for making time to attend.</p> <p>Apologies Andrea Siebritz (AS)</p> <p>Minutes The minutes of the previous meeting were accepted as a true reflection of the meeting proceedings.</p> <p>Agenda The agenda was adopted with no amendments</p>	

2.	<p>Solar PV Module Reuse – Presentation</p> <ul style="list-style-type: none"> • NC: • Delivered a presentation outlining the early-stage research of her PhD, which focuses on the reuse of waste solar photovoltaic (PV) modules through a value chain and circular economy approach in South Africa. • Provided background on the rapid growth in global and local solar PV deployment, noting projections that cumulative global PV capacity could reach approximately 7 terawatts by 2030. While declining PV costs, supportive policies, and investor demand continue to drive expansion. • Highlighted that PV modules inevitably reach end-of-life due to early failure, damage from severe weather events, or economic decommissioning as newer, more efficient technologies enter the market. • The presentation outlined concerns associated with unmanaged PV waste, including: <ul style="list-style-type: none"> - Potential leakage of harmful elements (e.g. lead, cadmium, silver), - Loss of critical raw materials, - Embodied carbon emissions associated with PV module production. • NC PhD research focuses on: <ul style="list-style-type: none"> - Assessing the existing solar PV value chain in South Africa, - Reviewing policy and regulatory frameworks related to PV reuse and circularity, - Exploring implementation pathways for PV module reuse, - Identifying linkages between circular economy practices and the Just Energy Transition. • NC is applying a mixed-methods approach, including interviews with industry associations, government departments, refurbishers, recyclers, importers, and retailers, as well as surveys targeting e-waste recyclers and the broader solar energy sector. • NC requested support by raising awareness of the study, and encouraging relevant organisations and practitioners (utilities, asset owners, developers, O&M providers, installers) to complete an online survey. • https://www.surveymonkey.com/r/energysectorsurvey • The survey will remain open for a month, with a closing date of 9 January 2026. • NC thanked the group for the opportunity to present and shared her contact details for further engagement. 	Nicole Crozier
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	<ul style="list-style-type: none"> • SS expressed interest in engaging further and requested a separate offline discussion to explore practical challenges and knowledge gaps currently being encountered in the sector. • NC further confirmed that, in response to a query from RM, the presentation slides would be shared and that permission was granted to circulate the slides to all members. 	
3.	Focus Areas	
	<p>Extended Producer Responsibility (EPR) Regulations</p> <ul style="list-style-type: none"> • ZB welcomed representatives from the Department of Forestry, Fisheries and the Environment (DFFE), Mr. Jeremiah Sibande (JS) and Mr. Richard Ndonyana (RN), who were invited to provide clarity on ongoing compliance challenges and to outline the respective roles and responsibilities of industry, Producer Responsibility Organisations (PROs), and DFFE. • RN outlined several challenges currently faced by DFFE in implementing and administering the EPR Regulations: <ul style="list-style-type: none"> - Registration Backlog: A significant backlog exists due to late registrations and applications containing incorrect or inconsistent information, particularly where details do not align with CIPC documentation. This results in applications being returned for correction, further delaying processing. - Late Registration and Condonation Process: Many producers failed to register within the six-month regulatory timeframe following the promulgation of the EPR Regulations. Late registrations require formal motivation and must undergo a condonation process, which is lengthy due to internal approval chains within the department and the high volume of applications. - Lack of Follow-through After Condonation: Some producers fail to provide evidence of compliance after being condoned. This includes a lack of confirmation that they have either implemented their own EPR scheme or joined a PRO, as well as failure to demonstrate payment of outstanding EPR fees. • RN outlined roles and responsibilities. • Producers (Industry) are responsible for: <ul style="list-style-type: none"> - Designing products that are easier to recycle, reuse, and repair, and that contain fewer harmful materials. 	Patricia S- Lead Espee H Dr Dominic V

	<ul style="list-style-type: none"> - Funding end-of-life management, including collection, transportation, recycling, and safe disposal, primarily through membership and contributions to PROs. - Establishing systems to manage end-of-life waste generated by their products. - Submitting regular reports to DFFE on waste volumes, diversion from landfill, reuse, and recycling. • PROs are responsible for: <ul style="list-style-type: none"> - Collecting and managing funds from their producer members. - Implementing EPR schemes and coordinating waste collection and recovery activities. - Partnering with municipalities, recyclers, and buy-back centres to improve waste management outcomes. - Ensuring compliance with EPR targets specific to their sector notices. - Monitoring, recording, and reporting waste management and recycling performance to DFFE. - Promoting consumer awareness and education on proper waste management and recycling practices. • DFFE is responsible for: <ul style="list-style-type: none"> - Monitoring and enforcing compliance with EPR Regulations. - Tracking compliance of condoned producers and ensuring payment of EPR fees. - Issuing compliance notices where required reports (interim, performance, or financial) are not submitted. - Conducting environmental education and awareness initiatives. - Protecting natural resources and overseeing regulatory implementation. • RN outlined Proposed Solutions and Improvements. • Industry-led Solutions: <ul style="list-style-type: none"> - Development of simplified reporting systems to reduce errors and speed up submissions. - Improved environmental labelling to provide clear, visible recycling and disposal instructions for consumers. - Product design improvements to enhance recyclability and reduce processing costs. • PRO-led Solutions: <ul style="list-style-type: none"> - Strengthening partnerships with municipalities and recyclers to improve collection efficiency. - Implementing digital tracking systems for real-time monitoring of waste collection, treatment, and recycling. - Conducting consumer awareness campaigns. - Providing technical support and training to producers experiencing compliance challenges. 	
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	<ul style="list-style-type: none"> • Department-led Solutions: <ul style="list-style-type: none"> - Development of clear guidance documents and reporting templates to support compliance. - Improving support systems for registrations, approvals, and audits once backlogs are addressed. - Supporting the development of waste management infrastructure, including drop-off points and buy-back centres. • ZB queried how DFFE protects producers when a Producer Responsibility Organisation (PRO) fails to meet compliance obligations and whether formal mechanisms exist for affected producers. • DFFE Response (JS): • Non-compliance is addressed under the EPR Regulations, which impose legal obligations on PROs; breaches may result in sanctions, including revocation of approval. • Non-compliance is monitored through half-yearly performance reports and verification audits across the value chain. • Severity determines the response: minor issues are handled collaboratively; serious offences are referred to the Environmental Management Inspectorate (EMI). • Enforcement applies to both PROs and their members. • Producers are encouraged to monitor their PRO against contractual agreements and report non-compliance to DFFE, which may lead to administrative or criminal action. • NC asked for clarification on the percentage of producers that are compliant, noting that while the total number of PRO members is known, the actual compliance rate among producers is unclear, and on the number of compliance notices issued and how many producers have rectified non-compliance or progressed to enforcement action under the Act. • RN noted that exact compliance numbers are not currently available, some producers have been referred to the compliance team for failing to register or pay PRO fees, and outstanding fees from 2022–2024 remain a challenge. • JS stated that detailed compliance statistics will be provided at the next engagement by sector, noting that the current database covers ~194 producers across all EPR sectors, about 20 compliance notices are issued per quarter with prior cases closed first, non-compliance is significant in the electrical and electronic equipment (EEE) sector with ~300 unregistered producers while other sectors like paper and packaging are nearly fully registered, and DFFE is working with SARS and the Department of Trade and Industry to identify importers/producers and link registration to EPR compliance, though no formal mechanism is yet in place. 	
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	<ul style="list-style-type: none"> • SS raised a concern that while EPR regulations specify annual recovery tonnage, actual reported recovery through PROs is only around 25–26% of products placed on the market, noting that long-lifespan renewable energy products, particularly solar PV modules, make it difficult to meet annual targets and may cause fully registered producers to appear non-compliant, and asked whether DFFE had considered amending regulations or setting different requirements for such products. • DFFE Response (JS): • DFFE acknowledges that renewable energy products have longer lifespans than the short-term products originally considered when setting targets. • Amendments to the EPR regulations were published in November last year, with an extended public commenting period until end of January this year. • The department is currently reviewing submitted comments, which indicate that substantial changes are needed, warranting another round of public comments, expected to close around February next year. • The goal is to have the amended regulations finalized by the end of the current financial year (March) for ministerial approval and implementation. • DFFE invites industry to submit motivations and proposals for how renewable energy products, including solar PV modules and wind energy components, should be regulated under EPR. • These proposals could inform the development of a special notice or sector-specific regulations that better reflect the unique characteristics and lifespans of these products. • ZB raised a question regarding how producers are protected if a PRO closes before the end-of-life of long-lived renewable energy products, such as solar PV modules. • DFFE Response (JS): • PROs are required to be non-profit companies and must include producer representation on the board of directors, strengthening corporate governance. • Board representation ensures that producers are aware of any decisions to liquidate or close a PRO, preventing such actions from being a surprise. • Under proposed regulatory amendments, a PRO must notify the DFFE prior to liquidation, in accordance with the Companies Act. • This ensures that the closure process aligns with both EPR requirements and general fiduciary responsibilities of directors under South African law. 	
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	<ul style="list-style-type: none"> These measures aim to mitigate risk for producers and ensure continuity of compliance obligations. 	
5.	<p>Closure</p> <ul style="list-style-type: none"> ZB thanked all participants for their contributions and attendance. Expressed appreciation to Nicole Crozier for her presentation on end-of-life management. Thanked the DFFE team for their engagement on EPR regulations, compliance, and reporting processes. Noted that this was the final meeting for the year, and emphasized that the working group will continue collaboration next year on ensuring EPR compliance and progressing discussions and sharing information on end-of-life processes. Meeting adjourned with thanks to all participants. 	<p>Next Meeting: February 2026</p>

Action Items:

NO:	ACTION	BY WHOM
1.	<p>Solar PV Module Reuse and Circular Economy</p> <p>Circulate Nicole Crozier's presentation to all members and share the survey link for further inputs. https://www.surveymonkey.com/r/energysectorsurvey</p> <p>Arrange follow-up discussion/workshop with Nicole Crozier on draft findings and reuse aspects.</p>	<p>Zimkita B</p> <p>Steffen S</p>
2.	<p>Water Use Licence Applications (WULA)</p> <p>Follow up with DWS regional offices on the status of submitted WULA applications.</p> <p>Forward correspondence on the Energy One Stop Shop to DWS to explore possible process alignment.</p>	<p>Kakale M</p>

<p>3.</p>	<p>EPR</p> <p>DFFE to provide detailed statistics on producer compliance, compliance notices issued, and enforcement actions per sector at the next engagement.</p> <p>Prepare proposals/motivation regarding EPR targets for long-life renewable energy products (solar PV modules, wind, etc.) for consideration in upcoming regulation amendments.</p>	<p>Jeremiah S Richard N</p> <p>All Members</p>
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