

# ANNUAL PERFORMANCE REPORT 2025 PUBLIC

**LIGHTING:**

19/7/7/L/PRO/20211123/004

**PORTABLE BATTERIES:**

19/7/5/P/PRO/20230710/045

**LUBRICANTS OIL:**

19/7/7/L/PRO/20240429/053





EPR Waste Association  
of South Africa

## Table of Contents

1. 2025 Annual Scheme Highlights	p1
2. Financial Overview	p2
3. Lighting	p3
4. Portable Batteries	p4
5. Lubricant Oils	p5
6. Projects & Impact Overview	p5
7. Governance Report	p7

# 2025 ANNUAL SCHEME HIGHLIGHTS

The eWASA Scheme is a comprehensive, rolling five-year action plan collaboratively developed with stakeholders to meet producers' obligations under the Extended Producer Responsibility (EPR) Regulations of 2020. This scheme ensures the environmentally sound management of three of five critical waste streams: Portable Batteries, Lighting and Lubricant Oils. By aligning with regulatory requirements, the plan embodies eWASA's commitment to sustainability and shared responsibility in waste management.

## LIGHTING



**R309 013.00**  
SMME development



**3**  
New jobs created



**R27 940.00**  
Waste Handlers Refunds

## PORTABLE BATTERIES



**R4 302.00**  
SMME development



**R56.00**  
Waste Handlers Refunds

# FINANCIAL OVERVIEW

*Regulation 8(1)(c)(d)(iii), and 5A(1)(a)*

## **FINANCIAL PERFORMANCE (CONSOLIDATED)**

The 2025 financial overview demonstrates a conservative and disciplined approach to budgeting, with actual expenditure remaining closely aligned to approved forecasts. A measured strategy was applied throughout the financial year, supported by prudent fiscal management to ensure organizational stability while enabling continued progress on priority initiatives.

40% of the EPR fee was allocated to waste collection and end-of-life waste handling services, in accordance with the approved EPR fee allocation. Payments to waste handlers improved, leading to better utilization of the allocated budget for end-of-life product management.

## **ADMINISTRATION BUDGET**

eWASA has currently utilized 8.40% of the actual revenue billed and is within the 12% cap as per regulations 7 (7)(a) and 7(7)(b)(iii) of the EPR Regulations.

## **PROJECT BUDGET**

Both budgeted and actual project expenditure increased steadily over the financial year. As at year-end, actual expenditure amounted to R40 576 758.

# LIGHTING

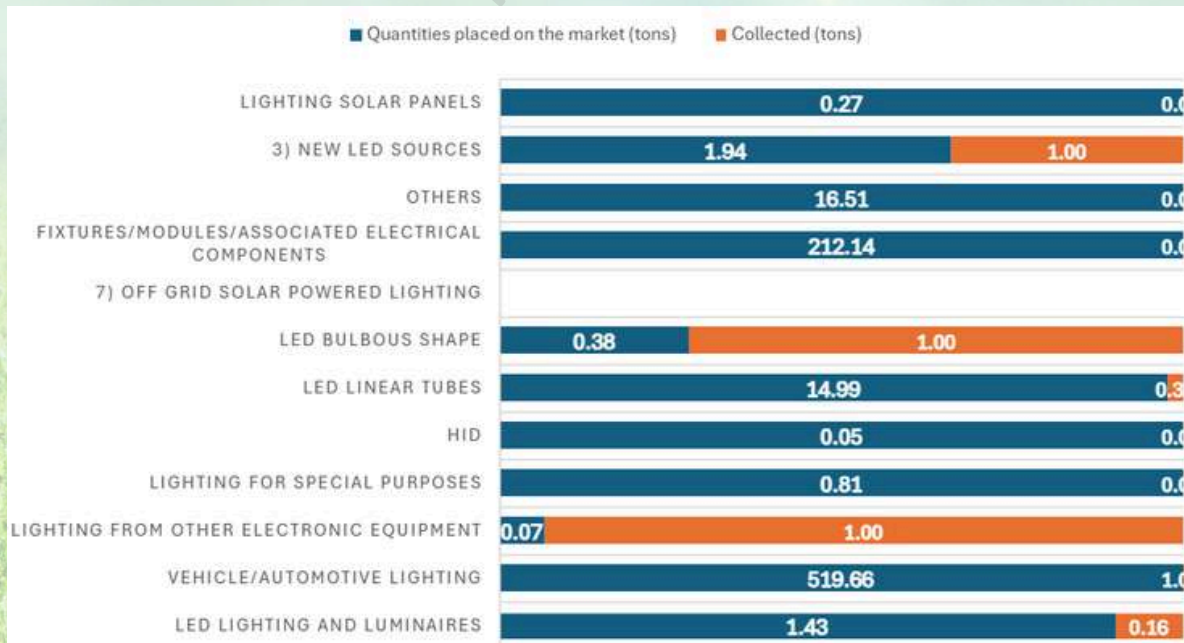
## EXECUTIVE SUMMARY

The first half of 2025 marked substantial progress on infrastructure development for the lighting waste stream under eWASA’s EPR programme. The Hammarsdale-based lighting recycling plant advanced through key phases, including the finalisation of process flows, occupational health and safety documentation, and initial training for operators. The successful launch of the Hammesdale site in September 2025, made way for the start of projects on site, ensuring that there is capacity to meet key deliverables in the sector.

Our ongoing facilitation with key partners and the re-established open reporting channels, is shaping a different picture for the organization. A similar dip occurred in the 2024 interim period, yet by year-end, performance rebounded significantly across most categories. We expect a similar recovery in 2025, excluding automotive vehicle lighting. This trend, combined with strategic engagement, highlights the importance of strong partnerships, infrastructure readiness, and responsive data; core enablers of secondary end market growth, innovation, and enterprise development within a circular economy.

## PERFORMANCE AGAINST TARGETS

Regulation 8(1)(d)(i); 5A(1)(i)(j)(k) and (n)



## CONCLUSION

The groundwork has been firmly laid for the full implementation in 2025 with key structural, financial, and partnerships in place for the year ahead. As operational readiness continues to improve, we are confident that the lighting sector is well positioned to achieve the regulatory targets and improved performance for 2026.

# PORTABLE BATTERIES

## EXECUTIVE SUMMARY

During the first half of 2025, eWASA made measurable progress in establishing the foundational administrative, reporting, and compliance systems required for the implementation of its Extended Producer Responsibility (EPR) scheme for portable batteries. During this reporting period, five producers formally registered with the scheme and submitted declarations for products placed on the market, resulting in 1.91 tonnes of portable batteries being recorded within the scheme's data management system. As implementation advanced, additional producers that had previously been registered under other schemes commenced declarations of portable batteries placed on the market. By the end of the 2025 calendar year, the scheme had demonstrated accelerated performance growth, with cumulative collections reaching 54.66 tonnes of portable batteries. This outcome substantially exceeded the applicable national collection target of 19.1 tonnes for the reporting period.

In 2025, a total of 470.45 tonnes of portable batteries were reported as placed on the market by registered producer members under eWASA portable battery scheme. The breakdown of these volumes is as below:

With growing producer participation and the deployment of collection infrastructure in schools and retail locations, it is anticipated that volumes collected and treated will begin reflecting positively against future targets in the 2026 period.

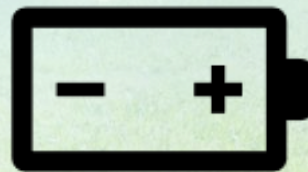
## PERFORMANCE AGAINST TARGETS

*Regulation 8(1)(d)(i); 5A(1)(i)(j)(k) and (n)*



**PLACED ON MARKET**

**470.45 Tons**



**COLLECTED**

**54.66 Tons**

## CONCLUSION

The identification of legacy stock that was processed by the appointed SMME and the alignment of existing infrastructure for battery shredding demonstrates that the sector is transitioning from planning to implementation. With continued stakeholder collaboration and strategic partnerships, eWASA is well-positioned to scale up performance in the year and support the long-term sustainability of portable battery management in South Africa.

# LUBRICANT OILS

## EXECUTIVE SUMMARY

The lubricant oils scheme remains in its infancy stage as still in its developmental phase, with no collection or recycling activities undertaken to date. Key groundwork has been prioritized, including the setup of reporting systems, producer support mechanisms, and strategic planning for operational rollout.

# PROJECTS & IMPACT OVERVIEW

In line with our 2025 Extended Producer Responsibility (EPR) strategy, eWASA recognizes the importance of efficient and collaborative projects for identified products across our registered material streams. The Integrated project approach is an innovative approach to finding sustainable solutions that speaks to key objects of the EPR Regulations.

## Lighting Sector

During the first four years of EPR implementation, the lighting sector has continued to face systemic challenges in improving collection and recycling rates for lighting waste. Key constraints include high collection and logistics costs, declining participation from the recycler network due to limited commercial viability, elevated compliance costs, and the need for specialised processing plant and equipment.

In response to these challenges, eWASA has progressed the establishment of a decentralised micro-processing facility at the Use-It Beneficiation Centre in Hammarsdale, KwaZulu-Natal. The micro-plant is operated by a newly established recycling SMME, Mr Green Lighting, and is intended to strengthen localised processing capacity, reduce transport costs, and improve the economic feasibility of lighting waste recycling in the region. The facility employed three individuals in the 2025 period, contributing to an increase in job creation.

## SMME Development and Support

eWASA supported the establishment and operationalisation of Mr Green Lighting, a start-up recycling SMME focusing on the collection, dismantling, and shredding of lighting waste. This intervention contributes directly to the development of small enterprises within the recycling value chain and promotes inclusive participation in the circular economy.

eWASA's support to Mr Green Lighting included:

The creation of three (3) direct jobs. Contribution towards monthly plant operational costs; and Support for logistics and collection costs to enable feedstock mobilisation.

This initiative contributes to local economic development while strengthening decentralised processing capacity within the lighting sector.

## Collected Feedstock (Reporting Period)

During the reporting period, Mr Green Lighting processed the following lighting waste feedstock:

- 1,455 kg of automotive
- lighting components; 200 kg of LED lighting components.

These volumes represent early-stage operational throughput as part of pilot operations at the Hammarsdale micro-processing facility.

## Portable Battery Trials

In 2025, Mr Green Lighting collected 646.8 kg of portable batteries from Eveready and various Toyota dealerships in Durban to support pilot processing trials at the Hammarsdale micro-plant. As part of research and development activities, 1 kg of battery-derived black mass was dispatched to Cwenga Laboratories for analytical testing to assess material composition and potential downstream processing options.

These trials form part of eWASA's broader efforts to assess the technical and commercial feasibility of decentralised battery pre-processing within South Africa.

## Portable Battery Information Session – with ten (10) schools present



Figure 5: eWASA's awareness on Portable batteries

eWASA supported school recycling awards hosted by Bontle ke Tlhago in 2025. As part of the ceremony, eWASA partnered with Duracell (one of eWASA's producer member) to raise awareness on the importance of portable battery recycling. The ceremony was attended by 10 different schools. The learners were asked questions and were given exciting prizes.

# GOVERNANCE REPORT

## PRODUCER BOARD MEMBERS

\*As per Regulation 11, the board is made up of producer members' representatives.

Name	Position
Keith Anderson	Founder & CEO
Andre Venter	Non-Executive Director
Marc Black	Non-Executive Director
Stephen Muli	Non-Executive Director
Michelene Locke	Non-Executive Director

Figure 10: eWASA's Board of Directors

## PRODUCER MEMBERS

### ***LIGHTING, PORTABLE BATTERIES AND LUBRICANT OILS***

L	PB	LO
Eaton Electric South Africa (Pty) Ltd	African Resonance Business Solutions (Pty) Ltd	Mercedes- Benz South Africa
Ever Star Industries (Pty) Ltd	New Clicks South Africa	RS South Africa
EXB Electric (Pty) Ltd	Johnson & Johnson Medical (Pty) Ltd	Sunfor Technologies
Jaguar Landrover SA & SSA	Sunfor Technologies	Toyota South Africa Motors (Pty) Ltd
RS South Africa	Mercedes- Benz South Africa	Volkswagen of South Africa (Pty) Ltd
Sunfor Technologies	Eveready (Pty) Ltd	The Spar Group Limited
Toyota South Africa Motors (Pty) Ltd	Duracell South Africa (Pty) Ltd	BMW South Africa (Pty) Ltd
Volkswagen of South Africa (Pty) Ltd	Uniross Batteries	Holdsport Group (Pty) Ltd
The Spar Group Limited	Musco Lighting South Africa (Pty) Limited	Tapestry Home Brands (Pty) Ltd
BMW South Africa (Pty) Ltd	Gentech Industries	
Holdsport Group (Pty) Ltd	Energizer South Africa (Ltd)	
Tapestry Home Brands (Pty) Ltd		
Mercedes- Benz South Africa		
Musco Lighting South Africa (Pty) Limited		
Gentech Industries		
Zebbies Electrical (Pty) Ltd		

eWASA subscribes to stringent governance ethos and practices in its EPR Programme. This governance involves the system of processes, principles, and values that direct how eWASA implements its EPR obligations in its own right and when it interacts with its network of Producers, Recyclers, etc. across the five Waste Streams, viz Paper and Packaging, Lighting, Electrical and Electronic Equipment (EEE), Portable batteries and Lubricant Oils. Our governance model ensures that we meet our own obligations as a PRO and that our members and stakeholders are beholden to EPR regulations and comply with same.

Our strong corporate governance structures promote accountability, transparency, and ethical conduct. To this end we have put in place effective management systems, policies, and procedures that enable us to manage our operations in compliance with the EPR regulations. We have a thorough member onboarding process that ensures all legislative requirements are met including registering on applicable government portals like SAWIC, paying the applicable levies based on what members put out into the South African Market – and submitting interim and annual reports as they become due. Our PRO Scheme is audited every year by a team of External Auditors as required by the regulations. In addition to this, we also audit our members every year to make sure that they are compliant with the EPR regulations and all other applicable legislation. We require all our members to meet all their legal obligations as far as their operations and EPR measures are concerned.

A pivotal element of our governance is managing the product value chain effectively and to determining who is responsible for the EPR compliance, to what extent and the EPR fees applicable. This requires and necessitates that we work collaboratively with manufacturers, retailers, importers, brand owners and other stakeholders to ensure that waste is collected, recycled, and disposed of in an environmentally responsible and sustainable manner that creates jobs, empowers communities and saves the environment.

Our governance encompasses robust reporting and disclosure mechanisms that enable stakeholders to monitor the performance of product responsibility organizations in meeting their EPR obligations. We report to our members in various fora and to government on how we spend EPR Funds. The amount we spend on Administration falls within the limits and prescripts set by the EPR regulations i.e., not more than 12% in year 4 of the regulations. The majority of EPR funds are channeled to specific EPR and Waste Management Programmes which include some of the following:

- Payment of waste pickers
- Waste Pickers Integration & support
- Waste Education and Awareness Campaigns at Schools and Communities
- Waste Equipment and Infrastructure
- Recycling Activities
- Beneficiation of Waste
- Waste to Art Initiatives
- Municipal Waste Projects
- Secondary End-Market Development
- Research and Development
- Public relations
- Employment creation ventures

Our governance includes regular statutory reporting on waste volumes, recycling rates, and compliance with regulatory requirements. We require our members to meet the reporting obligations timely with consequences for non-submission which result in members losing their compliance status.

Ultimately a strong governance framework is critical for us if we are to successfully implement the EPR regulations in the South African context for electronic waste, lighting, paper and packaging, and portable batteries sectors. Such governance enables us to promote sustainable and sound waste management practices, that not only protect the environment for future generations but creates jobs and opportunities now