

Mondi South Africa Division
Richards Bay Mill Operation

SEAT REPORT 2012

Socio-economic assessment toolbox report



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1. Introduction

1.1 BACKGROUND

A socio-economic assessment toolbox (SEAT) process is an opportunity for people whose lives are affected by Mondi's operations to speak to a neutral panel about how they perceive Mondi and its impacts.

The social and economic situation of a region is important to the sustainable development of Mondi. The main objective of the SEAT process is the identification of risks connected with changes in the socio-economic sphere in the region in which Mondi operates. The SEAT-assessment of 2011, finalised in 2012, aimed to:

- evaluate the status of issues identified during the previous SEAT study;
- understand the key changes in Mondi's structure and activities;
- identify the main external factors influencing socio-economic development of the region;
- identify critical socio-economic issues associated with Mondi's activity;
- evaluate the objectivity of critical issues and identify ways to improve this; and
- identify Mondi's strengths for further development.

The assessment team produces a report summarising the issues encountered during the interviews and Mondi management responds to each of the issues. The combined report is published and distributed to stakeholders.

The SEAT process is conducted on a rolling 3 to 5-year basis, and regular reviews are performed to establish whether management commitments to issues raised have been implemented. All Mondi SEAT Reports are available on the Mondi Group website.

The SEAT process is a participative one and the SEAT assessment team engages with a wide range of stakeholders to assess the impact that Mondi's operations have on their livelihoods and futures.

This particular SEAT review was carried out for Mondi South Africa Division (MSAD) Richards Bay Mill Operation (RBY), with stakeholder interviews being conducted between 15 November 2011 and 17 November 2011.

1.2 THE SEAT ASSESSMENT TEAM

The SEAT assessment team includes representatives of the company assessed, Mondi Group representatives and third party representatives. This is necessary for an objective evaluation. In 2011, the RBY SEAT team included:

- **Elena Amirkhanova,**
Principal Consultant, ERM UK (London)
- **Peter Gardiner,**
Natural Resources Manager, Mondi Group (London)
- **Lora Rossler,**
Corporate Affairs Manager, Mondi Group (Durban)
- **James Rycroft,**
Asset and Policy Manager, MSAD Forestry Operations (Hilton)
- **Mandla Mbokazi,**
CSI Manager, MSAD Richards Bay Mill (Richards Bay)

1.3 ACKNOWLEDGEMENTS

The SEAT team expresses sincere appreciation to all interested parties who actively participated in the consultation process. Specifically, the SEAT team would like to acknowledge the following people and organisations for their assistance:

- Mandla Mbokazi, Corporate Social Investment Manager Richards Bay Mill
- Collette van Staden, Communications Richards Bay Mill
- Sue Lupton, Personal Assistant Richards Bay Mill
- Marilyn Hutchinson and the staff at Homeleigh Guest House, KwaMbonambi



2. Approach and objectives

2.1 KEY STEPS

The SEAT assessment procedure consists of the following stages:

1. Planning the SEAT interviews, including choice of participants and venues.
2. Profiling MSAD RBY and affected communities within this area.
3. Identification and assessment of socio-economic impacts and issues through engaging in dialogue with stakeholders. During consultation, issues are discussed openly and in a way that encourages honest and diverse responses. Few direct questions are asked during these interviews; instead, open-ended questions are posed, allowing participants to direct the manner in which their responses are formulated and the assessment team to identify the most critical issues relating to Mondi's activities in the region.
4. Consolidating results of the consultation to identify positive and negative trends. This is followed by compiling a report for presentation to MSAD RBY senior management.
5. Compiling of management responses to key issues raised in the SEAT report, including what actions are being taken to solve these issues and what additional actions need to be made.
6. Providing transparent accountability of the commitments made through report-back to stakeholders and the distribution of the finalised SEAT report.

To complete this SEAT assessment, the following interviews took place:

Date	Stakeholders	Location
15 November 2011	Mondi employees	Canteen
15 November 2011	Contractors and suppliers	Canteen
16 November 2011	Open session – Mondi employees	Canteen
16 November 2011	Government and authorities	Umdlathuze municipality
16 November 2011	Non-governmental organisations (NGOs)	Richards Bay – Conference room 1
17 November 2011	Local industries and the Zululand Chamber of Commerce and Industry	Richards Bay – Conference room 1
17 November 2011	Customers	Procurement office
17 November 2011	Local schools	Richards Bay – Conference room 1
17 November 2011	Management	Richards Bay – Conference room 1

2.2 OBJECTIVES

The objectives of this SEAT assessment were to:

- understand the range of stakeholders and their perceptions of MSAD RBY;
- identify and prioritise the key social, economic and environmental impacts which must be addressed by MSAD RBY; and
- assess the effectiveness of existing social management systems and initiatives.

2.3 STUDY AREA AND STAKEHOLDER OVERVIEW

The SEAT assessment was conducted over the full operational area of MSAD Richards Bay mill operations, and included interviews with stakeholders from all areas. Invitations were sent to a large cross section of stakeholders which included the following groups:

- Contractors
- Environmental stakeholders
- Communities
- School principals
- Mondi employees
- Neighbours
- Local administrators
- Richards Bay Clean Air Association (RBCAA)

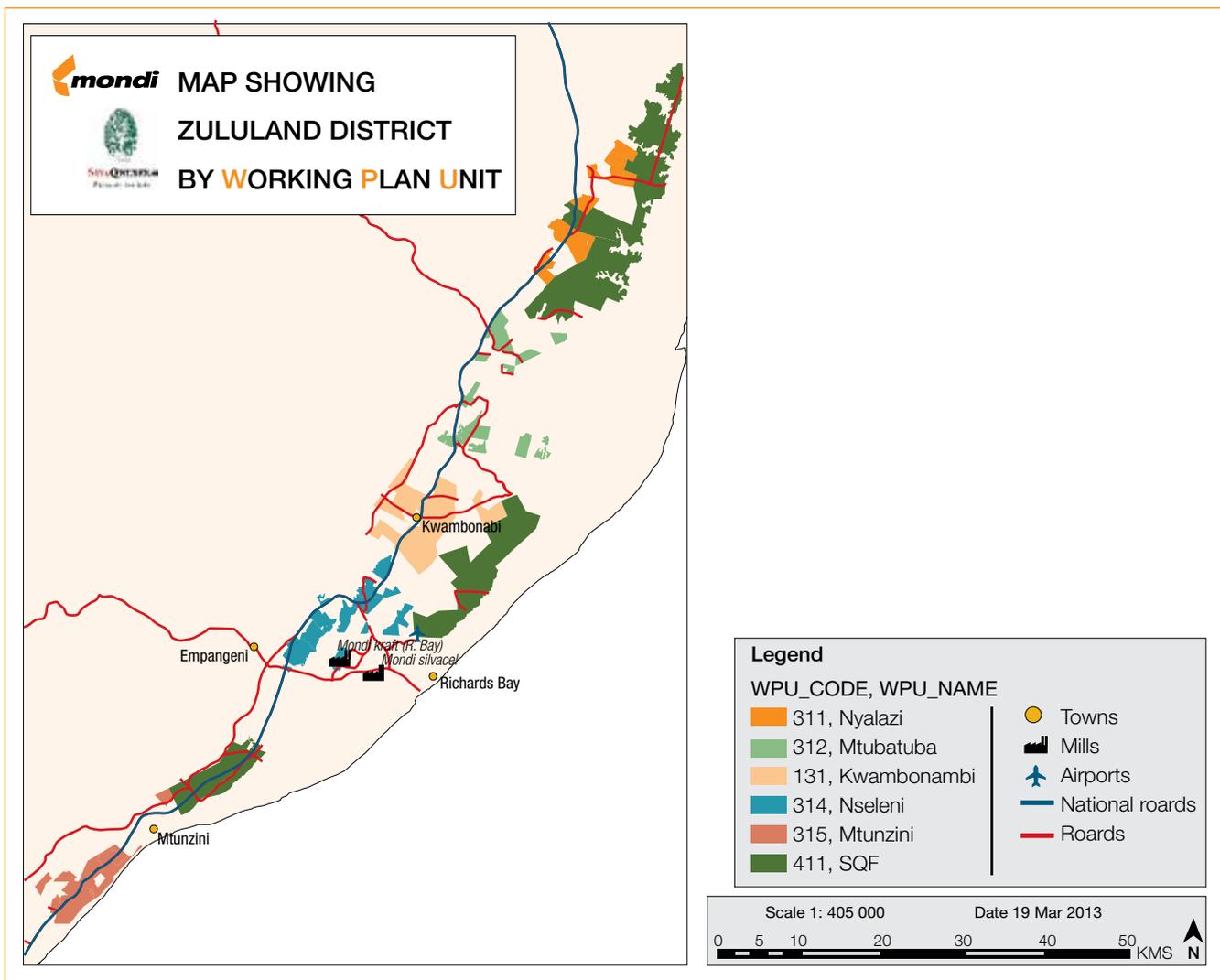
3. Overview of the operation

RBY mill is situated in the town of Richards Bay on the north coast of KwaZulu-Natal, South Africa. The town of Richards Bay is characterised by a local economy driven largely by heavy industry and businesses associated with the deep-water port.

RBY mill is located in a heavy industrial precinct of Richards Bay, and is neighboured by other significant industrial

installations. A residential community does not immediately border it. However, the communities surrounding Richards Bay town are situated in mainly rural areas and are exposed to high levels of poverty. They are in need of education, health and infrastructure development support.

MSAD RBY employed approximately 700 people directly and 600 contractors in 2012.



4. Existing social management systems

4.1 SOCIAL MANAGEMENT SYSTEMS

Mondi engages with local communities, employees and contractors on an ongoing basis with the aim to build sustainable, mutually beneficial relationships. Existing social management systems, like SEAT and the development of community engagement plans (CEPs), are used as tools for planning and communication throughout the year. CEPs are in place at all our material operations, including RBY and assist us in maintaining dialogue.

4.2 CORPORATE SOCIAL INVESTMENT

Corporate social investment (CSI) is defined as contributions (either monetary, employee time and resources, or gifts in kind) which bring benefits over and above those directly associated with Mondi's core business activities. CSI is undertaken in line with specific CSI strategies developed during the CEP preparation process, and through consultation with local communities.

MSAD RBY has a separate budget for all CSI activities. During 2012, all CSI programmes were reviewed to ensure that they met the following criteria:

- the priorities of the local people;
- the principles of sustainable development;
- Mondi's interests; and
- cost effectiveness.

Greater focus has been placed on ensuring that Mondi's CSI strategies are relevant to the ongoing needs of our employees and the communities in which they live and work.

4.3 IMPACTS IDENTIFIED

Employment

RBY mill is one of the largest direct and indirect employers in the region, with some 700 direct employees and 600 indirect employees who are employed by contractors. In turn, a larger group of approximately 5,200 is dependent on the wages and salaries received by direct and indirect employees.

Zululand Chamber of Commerce

The mill is a member of the Zululand Chamber of Commerce and Industry, which collectively represents local industries on areas of mutual interest. Particularly, the Chamber engages with the municipality on issues relating to the growth and development of Richards Bay, and has been involved in a number of key projects, including the development of an Industrial Development Zone (IDZ) as a tool to attract and retain investment into the region.

Regional economic player

As one of the largest industries located in Richards Bay, the mill is an important local and regional economic player. Through its relationship with the Port of Richards Bay, the export of pulp and woodchips, and with its generation of foreign revenue through the sale of such, the mill is an important contributor to the regional economy.

Corporate social investment initiatives

The mill is actively involved in a number of CSI initiatives within the region. These include support for education institutions through paper donations and contributions towards infrastructure, and participation in a number of joint projects, including a number of social welfare institutions.

Odour

The emission of odours from RBY was an impact identified during the SEAT process.



5. Key issues raised by stakeholders

5.1 POSITIVE FINDINGS

Communication

All external stakeholders reported that the channels of communication between themselves and RBY were good. School principals and representatives reported that the RBY CSI team was actively involved in their institutions, and made regular visits which provided an opportunity for feedback and comment to be shared by the parties.

Employees reported that they were appreciative of internal communications systems, which they noted were working and in use. Particularly, the Mondi cascades sessions, held during the course of 2011, and the distribution of regular briefings by the RBY chief executive officer, were noted as welcome developments in respect of internal communication.

Members of the RBCAA noted that RBY was regarded as the flagship and benchmark for communication around environmental issues through its transparent approach to participating in forums and in sharing information. Further, it was noted that other industries in Richards Bay should follow the example set by RBY in respect of communication.

Corporate governance

Contractor stakeholders expressed their view that the corporate governance systems employed by RBY were good. In particular, the High Value tender system was seen as working and an example of good corporate governance for others to follow.

On the issue of Broad-based Black Economic Empowerment (B-BBEE), a key issue with regards to business sustainability in South Africa, contractors reported that the B-BBEE requirements of RBY were clear and understood by all, and that such requirements were known to be an important part of entering into a contract with RBY.

Employees noted that the systems employed by RBY in respect of procurement and financial controls were operational and effective in their use.

Corporate social investment

CSI was an area where significant positive responses were received. CSI stakeholders noted that RBY was perceived to have a genuine desire to participate in community development activities and initiatives.

School stakeholders noted their reliance on paper donations received from RBY, and expressed their gratitude at the ongoing levels of support. Some noted that RBY paper

donations were used to print examination papers for learners and that without such donations conducting examinations would have been challenging.

The RBY Mondi 21 event, a 21 kilometre fun-run and walk event, was regarded as an important part of the local development calendar. The event, where different social welfare and development organisations are given an opportunity to actively fundraise during the race itself, was seen as innovative and as an indicator of RBY's commitment to local issues.

Business performance

Contractor stakeholders reported that they perceived RBY to be business-minded and pragmatic. It was noted during the contractor interviews that RBY was a proficient negotiator during contract negotiations. Importantly, contractors acknowledged that the mill is a production environment, and that all parties needed to deliver per contract in order to achieve targets.

Furthermore, contractors noted that tender documentation was simple and effective, particularly in comparison to other industries in the Richards Bay area.

Safety was recognised by all relevant stakeholders as being a business priority, with contractor stakeholders noting that the safety requirements of RBY were perceived as thorough and having stringent requirements.

The sole customer interviewed remarked that RBY had scored highest on their supplier evaluation process.

Employee development and appraisal

Employees across all levels interviewed by the panel noted that training and study schemes were in place, and were effective.

The 2005 RBY SEAT found that there was no employee performance appraisal system in place. However, during this SEAT assessment, it was established that an employee performance appraisal system was in place.

5.2 CHALLENGES IDENTIFIED

Regional concerns

Many of the stakeholders interviewed expressed their concerns around the regional economy and its growth prospects. In particular, stakeholders commented on the growing attractiveness of Mozambique as an investment location, and cited lower costs and fewer barriers to entry as reasons for attraction of capital that otherwise might

5. Key issues raised by stakeholders continued

have been attracted to Richards Bay. Further, stakeholders commented that at the time of the interviews, the last significant capital expansion project in the Richards Bay area had been completed two years previously, and that there was a worrying lack of interest in the Richards Bay IDZ project from a new investment perspective.

Linked to these was the concern raised around the lack of significant regional opportunities for the youth, in the form of training and formal employment opportunities. It was felt that the various industries in Richards Bay could assist beyond their current levels in meeting this growing problem.

While these concerns are not directly related to RBY, their expression by stakeholders serves to underline the importance of RBY and other industries to the Richards Bay area as sources of regional economic growth and employment for locally based people.

Rising costs

Employees, particularly those at a factory floor level, expressed their concerns at the increase in the cost of living in general, and specifically increases associated with benefits like medical aid.

Local participation

While RBY was seen by stakeholders to participate in certain forums, like the Richards Bay Chamber of Commerce, certain stakeholders felt that RBY could be better represented at other forums, with the given example of the municipal Integrated Development Plan forum. These forums were expressed as being important tools for the future mapping of the growth and development of Richards Bay, and stakeholders felt that it would be appropriate and beneficial for RBY to be directly represented at such.

Odour

While all stakeholders raised the issue of odour, it was acknowledged that there had been some improvement in respect of odour emissions from RBY. Stakeholders were aware of the interventions and upgrades conducted by RBY in an attempt to improve the situation. Stakeholders were aware of the relationship between RBY and the RBCAA, and acknowledged efforts made in respect of communication of developments and other relevant information.

Although references made to odour during interviews ranged from humorous to significantly serious, it was apparent that



the issue, despite interventions made in the area, still requires further attention and improvement.

It was noted that the odour issue clouds good work done in other areas, for example school support and paper donations by RBY. This represents a significant challenge in that despite implementing a comprehensive CSI programme, the odour remains the largest issue of focus for stakeholders.

Several stakeholder groups acknowledged that RBY was perceived as being solely responsible for any odour in Richards Bay, despite it being well known that other industries contribute to the problem. This was explained as possibly being related to the proactive approach of RBY in dealing with the issue, which may allow others to hide behind RBY initiatives.

A number of stakeholders also noted that there was a perception that the odour had an impact on health, particularly around respiratory infections and ailments.

Engagement

A trend that emerged during stakeholder interviews was that of the visibility of RBY information relevant to a particular group. This related to information at all levels and aspects of RBY, and included internal and external information flows.

In respect of RBY CSI programmes, stakeholders reported that they were uncertain of RBY CSI policy, funding requirements and deadlines set by RBY to access funding. Further, some stakeholders noted that outside of flagship initiatives, like the Mondi 21 event, they were not aware of other programmes established or supported by RBY within the Richards Bay area.

Contractors reported that the requirements for registration as a vendor with RBY were not widely publicised, creating a barrier for entry for emerging ventures or businesses hoping to offer services to RBY. However, contractors reported that once they were able to register as a vendor with RBY after meeting relevant criteria, they were able to carry out business dealings without significant obstacles.

Stakeholders, outside of those associated with the RBCAA, were generally unaware of the odour correction measures undertaken by RBY. Given the observations above, identifying

odour as an impact, and the positive feedback received from civil society in respect of the proactivity of RBY in respect of the odour, this is a particular challenge for RBY.

Stakeholders external to RBY noted that they had not been engaged on information relating to the performance of the wider Mondi Group, and further noted that they would welcome engagement on the strategy of RBY, together with its future vision, plans and projects. In particular, the same stakeholders noted that they were not informed of RBY's environmental performance; however, comments in this regard typically included a reference to Forestry Operations, which suggests a need for collaboration on information sharing between RBY and the MSAD Forestry Operations in this regard.

Employees noted that while internal communication was good and positive overall, there was a need for the development of action plans and ongoing feedback channels following formal engagements with RBY management. One such example provided was that of the 'temperature check' exercises undertaken by RBY management during 2010, after which employees perceived that there was little follow-up in respect of a clear action plan. Employees further noted that interdepartmental communication was a challenge through silo-type structures, which were perceived as barriers to clear and effective communication between departments.

Employees

Legacy challenges

A theme common to all employee interviews was that of reference to previous MSAD management, characterised by significant organisational restructuring and associated uncertainty and unhappiness among the employees. As noted, the constant references by employees to this period led to the observation that there was still some unhappiness resulting from that era. Furthermore, it was evident that problems or issues relating to the present management of RBY were exacerbated by the unresolved nature of historical issues.

This was seen through the employee submission that significant negative association was made with some foreign secondments to RBY, and that such association was consistent irrespective of the management level of the secondment.

5. Key issues raised by stakeholders continued

Employees noted that current issues relating to the shortage of critical skills were a function of historical restructuring. It was further noted that such skills shortages caused by historical restructuring had not been resolved, which resulted in the significant over-allocation of work to members of the current employee complement. Employees expressed concern that the present situation needed attention, but noted their commitment to assisting management with the development of an appropriate solution.

Employees interviewed also noted that a product of historical restructuring was the negative impact of decisions that were made by central services functions on RBV operations. This was explained as meaning that business decisions taken were not fully informed of the onsite operational requirements of RBV.

Lastly, employee respondents commented that a key legacy issue was the development of a culture of trust between line management and floor-level employees, which was expressed as hindering dialogue between the parties.

Culture challenges

Management employees interviewed commented that they had concerns that the business was focused on short-term productivity and targets without adequate consideration of a longer-term sustainability factors. The interviewed employees acknowledged that RBV was a production environment, but cautioned against avoiding consideration of the longer-term impacts in pursuit of achieving short-term targets.

It was felt that a focus on short-term gains had not encouraged a considerate, polite and empathetic management culture. It was explained that this culture had contributed to a feeling of work-to-rule, as employees were worried about participating beyond their immediate mandates. This was supported by an observation that low morale was encountered on factory floor level. It must be noted that all participants were quick to explicitly exclude the present chief executive officer from these observations.



Impact of staff turnover

As noted above, historical restructuring is perceived by respondents as responsible for a critical skills shortage and related increased workloads on current employees. However, participants extended this observation to include latter-day staff turnover, particularly at management level, leading to the perception among respondents of a constant state of flux and a lack of continuity.

On this point, contractors noted that there were frequent changes to contractor managers, which they observed as being a hurdle to their ability to perform correctly to the terms of their contracts. Similarly, employees noted that regular changes to line management were disruptive through the regular introduction of new managerial styles and systems.

In addition to the above comment in respect of employee concerns around longer-term sustainability, it was noted that short-term secondments led to a focus on short-term gains. This was seen as a challenge, as employees felt that secondments would arrive and drive performance to achieve their targets, and not consider issues arising outside of their tenure period. Employees felt that as members of the group who undertook periods of intense short-term focus, they would be held responsible for the consequences of a previous manager's decisions.

Transformation

It was observed that employees, particularly at factory level, perceived that in some departments the race of an employee might play a role in determining their career prospects. This was explained as meaning that certain departments had acquired a reputation as being beneficial for the career development of persons from particular race groups. A particular comment recorded by the panel noted that "policy exists, but it is not supported by practice".

Contractor participants noted that RBY procurement practices could be further adjusted to facilitate greater involvement of emerging businesses. Interestingly, this observation was made and supported by established contractors, who expressed their concern around the growth of the contractor pool in the Richards Bay region.

Employee participants noted that they were aware of transformation committee meetings, but commented that there was insufficient feedback received from these meetings. This led to the perception that RBY was not fully focused on issues relating to the transformation of the business.

Management of human resources issues

Employees shared the view that the RBY Human Resources (HR) department was not perceived as strong enough to adequately deal with the challenges of a diverse working environment. This observation was made through comments suggesting uncertainty around training opportunities, promotion and job movement criteria.

Employees expressed their concern around the closure of the Mondi Pension Fund, which was due to be completed in quarter one of 2012.

Safety

Employees felt that in some parts of the business, management was unaware of certain operational conditions at floor level, which were felt to be unsafe. Additionally, employees expressed their concern that production targets seem to be taking precedence over appropriate levels of maintenance, a factor which was felt to contribute to an unsafe working environment.

6. Management response

Broad concerns

6.1 REGIONAL CONCERNS

Concern: Regional economic growth prospects in RBY. This is linked to the limited opportunities available to the local youth.

Response: Though this may not be directly linked to Mondi, Mondi will continue to seek opportunities to give access to job opportunities through its apprenticeships and training programmes. At any given time Mondi has an average of 50 trainees in its programmes. In addition, Mondi continuously seeks out investment opportunities to increase the mill's production capacity and in doing so, indirectly creates job opportunities for suppliers and contractors.

6.2 RISING COSTS

Concern: Employees at a shop floor level were concerned about the high cost of living associated with benefits such as medical aid.

Response: The high cost of living is a challenge faced by all South Africans. Although this is a concern, salary increases of shop floor employees over several years have been higher than the published inflation rate. The risk of this is the local labour rate becoming less competitive when compared to international competitors. The increase at this level becomes unsustainable over time without consideration of a commensurate increase in productivity.

6.3 LOCAL PARTICIPATION

Concern: It was noted that Mondi is not always represented at all the local forums, for example the Integrated Development Plan Forum.

Response: Richards Bay management acknowledges the need for representation in relevant forums, where Mondi's involvement can add value. We will continue to review our participation and monitor our stakeholder relationships.

6.4 ODOUR

Concern: It was noted that there was an improvement in this area, but despite interventions, further attention and improvement is required.

Response: Mondi has taken a phased approach to the reduction of odour. The first two phases have been implemented and we have approved the scope of the third

phase which will be implemented in 2013. To date Mondi has spent R80 million on odour abatement projects. We are also currently working on defining the scope of the odour abatement which is planned for 2014 which will address the high volume, low concentration sources throughout the mill. Internal programmes to increase awareness of operational issues which contribute to odours are in place.

6.5 ENGAGEMENT

Richards Bay CSI

Concern: Some stakeholders felt that more information on CSI policies and funding requirements should be provided.

Response: Mondi Richards Bay Mill is involved in a broad range of initiatives which focus on sustainable social and economic development in neighbouring communities. We form strategic partnerships with NGOs and want to be recognised as a good corporate citizen.

Mondi invests in communities in the following categories:

- Paper donations – local schools and NGOs;
- Sports and recreation – Mondi 21, Creating with Paper and Mondi Eisteddfod;
- Environmental education and awareness – Ecoquest;
- HIV/AIDS – Amangwe Village and internal awareness initiatives; and
- Education and training – *Pass Matric with Mondi* supplement, Unizul Science Centre and Science and Technology donations to schools.

We will improve our information sharing with stakeholders through regular meetings, visits to the mill and community projects.

Procurement

Concern: Contractors reported that the requirements for vendor registration were not widely publicised and not easily accessible by emerging businesses.

Response: Management will review relevant opportunities for emerging business and will ensure that the vendor registration process does not jeopardise these opportunities.

Group information

Concern: Stakeholders felt that they were not adequately informed about the Group's strategy, future vision, plans, projects and environmental performance, with special reference to the forestry operation.

Response: RBY acknowledges the need to strengthen information sharing pertaining to relevant parts of the business. We will share Mondi Group information in our local newsletters.

Internal communication

Concern: Employees noted that while communication is good and that it had improved considerably, there is a need to develop a feedback channel following formal engagements. They felt that there was no clear action plan or follow up on these initiatives. It was also noted that interdepartmental communication was a challenge due to the silo-type structures within the Group.

Response: Improved communication throughout the business is an area of focus. A formal communication plan is in place, which includes making better use of communication channels such as daily team meetings and news boards, as well as improving communication skills through training. Regular half yearly cascade meetings with all employees provide a platform to share plans, and give and receive feedback.

6.6 EMPLOYEES

Legacy challenges

Concern: Employees felt that historical organisational restructuring had a negative impact on RBY mill employees. Specifically in reference to critical skills shortages, a lack of trust between line management and floor level employees had developed, which had resulted in general unhappiness.

Response: A comprehensive survey of all the employees in Mondi Group was conducted in 2011. The findings were communicated and action plans have been developed to address the shortcomings.

Transformation

Concern: Some employees raised the concern that transformation was not working effectively in all departments.

Response: Management commits to the continuous improvement and effectiveness of the Transformation Committees.

Management of human resources issues

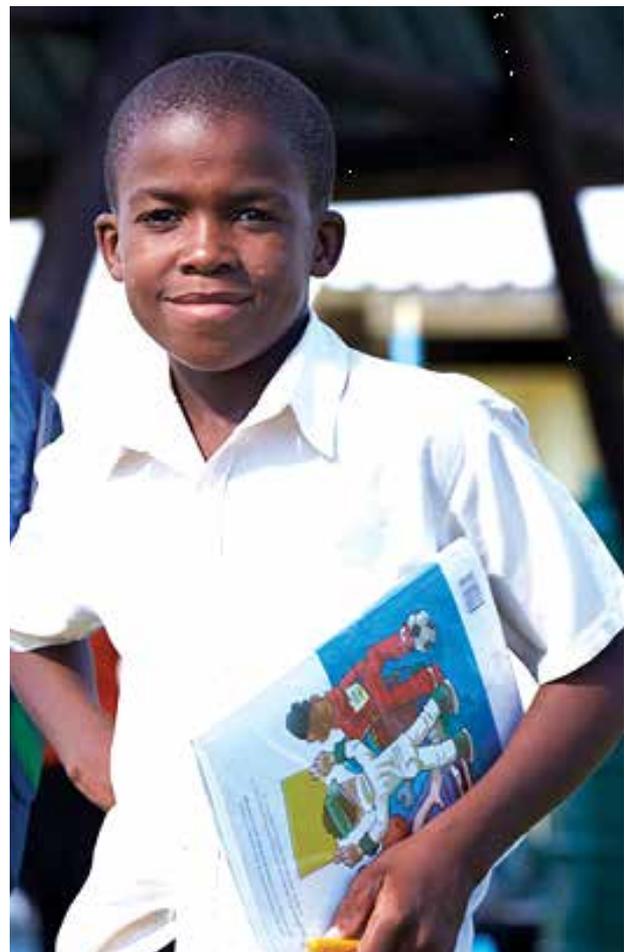
Concern: Employees felt that RBY HR department did not have the capacity to adequately deal with the challenges of a diverse working environment.

Response: Management is committed to improving service delivery in the HR department.

Safety

Concern: Employees felt that management was unaware of certain operational conditions at floor level. Production levels seemed to take precedence over maintenance and safety issues.

Response: Safety is a key priority of the mill and continuous improvement in processes and performance will be given priority. The mill's safety performance has steadily improved. The management team conducts monthly walkabouts to make direct contact with shop floor employees and discuss safety issues transparently. This process helps ensure good housekeeping practices.



7. Glossary of terms and acronyms

B-BBEE	Broad-based Black Economic Empowerment
CEPs	Community engagement plans
CSI	Corporate social investment
HR	Human resources
IDZ	Industrial Development Zone
MSAD	Mondi South Africa Division, a division of Mondi Group
RBCAA	Richards Bay Clean Air Association
RBY	Mondi Richards Bay Mill Operation
Richards Bay	The town of Richards Bay, in which RBY is located
SEAT	Socio-economic assessment toolbox



8. Contact details

For further details on Mondi South African Division Richards Bay Mill please contact:

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