

SAPPI SOUTHERN AFRICA LTD, SAICCOR PLANT COASTAL ADVISORY FORUM (CAF)

**Minutes of meeting held at 10:00 on Thursday, 6 August 2026
at the Italian Club Umkomaas and online via MSTeams**

Present (as per the attendance register)

Sumaiya Arabi (SA)	DFFE
Minenhle Bhengu (MB)	Sappi
Craig Daniel (CD)	Sappi
Des D'Sa (DDS)	SDCEA
Navika Govender (NG)	DWS
Henri Le Roux (HIR)	Sappi
Shanil Maharaj (SMa)	Umkhomazi Civic Association
Alfred Matsheke (AM)	KZN EDTEA
Zinhle Mbeka (ZM)	DWS
Samuel Mokoena (SM)	Sappi
Bongani Mtembu (BM)	SDCEA
David Naicker (DN)	Anti-Pollution Watchdog
Brent Newman (BN)	CSIR
Aadila Omarjee (AO)	CSIR
Welly Qwabe (WQ)	KZN Wildlife

Secretariat

Rose Owen (RO)	Phelamanga
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Apologies

Paul Govender (PG)	KZN SFF
Celokuhle Zondi (CZ)	SDCEA

Abbreviations - All members

AF	AJ Forbes	NBP	Nitasha Baijnath-Pillay
AM	Alfred Matsheke	NF	Nicolette Forbes
AO	Aadila Omarjee	NM	Ntombi Madibe
BM	Bongani Mthembu	NR	Ndou Rendani
BN	Brent Newman	PG	Peter Govender
BT	Busi Tshabalala	PrM	Prudence Mabokela
CD	Craig Daniel	RG	Risky Gumede
CM	Charles Mzobe	RO	Rose Owen
CP	Cyril Pillay	RP	Renelle Pillay
CT	Christabell Tshonaphi	SA	Sumaiya Arabi
DDS	Des D'Sa	SB	Santosh Bachoo
DN	David Naicker	SMa	Shanil Maharaj
EM	Elijah Masondo	SM	Samuel Mokoena
HIR	Henri Le Roux	SMg	Slindile Mgozi
JG	J Govender	SN	Siphelelo Ngubo
JM	Jabulile Madibe	SNa	Shane Naidoo
JP	John Peter	SNd	Sam Ndlovu
KM	Khethiwe Methula	SR	Sam Ramchariter
KMo	Krish Moodley	SS	Sphamandla Shabalala
KS	Kavershen Subben	SY	Serge Young
			Thandolwethu Kuzwayo
ML	Mpho Ligudu	TK	
MP	Mthabiso Phungula	TM	Tsepo Molotsi
MT	Mulalo Tshikotshi	WQ	Welly Qwabe
MTh	Mmaphefo Thwala	ZM	Zinhle Mbeka

ACTION

1. WELCOME, INTRODUCTION & APOLOGIES

- RO welcomed everyone and thanked them for attending the meeting. RO requested all to sign the attendance register and confirm their contact details.
- RO noted that there had been a number of apologies received as noted above.

2. SAFETY MINUTE

RO briefed the meeting regarding the venue emergency exits and toilets.

3. ACCEPTANCE OF AGENDA

The agenda was accepted and adopted.

4. PURPOSE AND FORMAT

The primary purpose shall be to ensure that the marine outfall owned and operated by SAPPI Southern Africa Limited; Saiccor Mill at Umkomaas is fully compliant with

- the conditions imposed by any licence or permit issued by a competent authority;
- local, national and international environmental legislation;
- environmental norms, standards, policies and guidelines;
- And that adverse impacts and pollution to the receiving environment are avoided and/or minimized within acceptable timeframes to acceptable standards.
- The forum is a platform to inform the authorities of concerns that may be raised during the licence period.
- Meetings shall be held quarterly, or as agreed by the members.
- Meetings shall be conducted in good faith and with full disclosure by all parties of all relevant information.

	<u>ACTION</u>
5. MINUTES OF THE PREVIOUS MEETING HELD ON 7 MAY 2026 AND CONFIRMATION THEREOF The minutes were approved and signed as a true record.	
6. MATTERS ARISING FROM THE MINUTES 1. None	
7. REPORT FROM SAPPI SAICCOR – HELD OVER TO AUGUST MEETING <i>[See Annexure for link to the presentation]</i> Contact details for the SAPPI Saiccor for queries, complaints were provided Landline 039 973 8911 Alternative line 080 133 4850 Cell phone 082 853 7258 Email Saiccor.enviro@sappi.com	
7.1. PERMIT COMPLIANCE 1. SM reported that: - There had been no overflows from the combined collector system during the reporting period. - Overall effluent compliance for the period was reported as approximately 94.7%. - The principal compliance challenge remained suspended solids/fibre loss. - Additional areas of non-compliance related to effluent volume and temperature. - Issues affecting water use included production requirements, Denim Water Plant regeneration activities, rainfall/stormwater entering the Combined Collector system and water-quality characteristics of incoming river water. 2. Suspended solids and fibre loss. SM explained that fibre loss was a continuing operational issue. Fibre is an important raw material in the production process and therefore Sappi has a commercial as well as environmental incentive to recover fibre rather than lose it to the effluent stream. 3. The highest suspended-solids averages occurred earlier in the reporting period. February was highlighted as particularly problematic, with an average of approximately 852.6 mg/l and 16 exceedances. April recorded approximately 695.5 mg/l and 14 exceedances. 4. Following implementation of a fibre-abatement/improvement plan, performance improved substantially: - May: approximately 392.1 mg/l, with six exceedances; - June: approximately 293.1 mg/l, with two exceedances. 5. The June average was therefore below the applicable 600 mg/l limit. 6. Sappi explained that the improvement plan identified several sources of fibre loss and introduced corrective measures. 7. Fibre-abatement plan. SM subsequently provided further detail on the fibre-abatement plan. 8. The plan is regarded as an ongoing improvement programme rather than a once-off intervention. Sappi is monitoring the identified sources of fibre loss and implementing corrective measures. 9. Particular attention has been given to contractors undertaking plant cleaning. Sam explained that workers had previously been observed washing fibre/material into drains using hoses. 10. Contractor supervisors had subsequently been trained on: - permit conditions; - environmental requirements; - the correct cleaning procedure;	

	<u>ACTION</u>
- the consequences of non-compliance; and - the need to train and obtain acknowledgement from their employees. - The objective is to prevent avoidable fibre losses from entering the drainage system. - A further technical issue was identified in relation to shutdown activities. Certain tanks cannot be completely emptied using the existing pumping arrangement because the pump inlet is approximately 0.5 m above the bottom of the tank. During shutdowns, this residual material can therefore present a fibre-loss risk. - Sappi is investigating alternative solutions to prevent material being discharged through drains during shutdown activities. Action: Sappi to continue implementing and monitoring the fibre-abatement plan and provide progress updates at subsequent CAF meetings	
7.2. EFFLUENT VOLUME AND WATER USE - SM explained that higher abstraction and effluent volumes can result from several factors, including: - production campaigns; - plant regeneration; - increased process-water requirements; - rainfall and stormwater entering the Combined Collector system; and - water-quality characteristics affecting plant regeneration frequency. - It was explained that when river levels are low, increased seawater influence can affect the hardness and conductivity of incoming water. This can increase the frequency of regeneration activities and consequently increase water consumption. - The meeting also discussed the relationship between production variability and daily effluent volumes. - CD clarified that the permit allows a defined annual/overall water-use envelope and that daily volumes can fluctuate depending on operational conditions. The proposed increase in the discharge volume was not intended to increase the authorised abstraction from the river.	
7.3. AUDIT SAMPLES - The meeting considered the comparison between Sappi's laboratory results and independent laboratory results, including Talbot and CSIR results. - The purpose of the exercise is to demonstrate consistency and reliability between laboratories. - The presentation showed comparisons for: - COD; - TDS; - pH; - electrical conductivity; - suspended solids; - temperature; and - lignin. - The presentation included relative percentage difference (RPD) information for several parameters. - A question was received from an online participant requesting that future audit-sample results, particularly the lignin results, include the percentage difference between the laboratories for each parameter and each sampling event. - It was noted that the current presentation makes it difficult to determine whether differences between Sappi and the external laboratories are statistically or operationally significant. - The facilitator requested that the same RPD approach already being used for other parameters be applied to lignin.	SAPPI to follow up

	<u>ACTION</u>
8. EFFLUENT QUALITY 1. SM presented the longer-term effluent-quality trend. 2. The presentation indicated that following implementation of the relevant process-improvement project, there had been a substantial reduction in average TDS and COD levels compared with earlier years. 3. The longer-term trend was presented to demonstrate the effect of process improvements on effluent quality. The presentation also included lignin results from August 2024 through May 2026.	
9. PLUME VISIBILITY AND FOAM ON BEACHES 1. The Forum considered historical and current trends relating to plume visibility and foam. 2. Sappi explained that plume and foam visibility had historically been higher before the marine outfall pipeline was extended in 1998. The objective of the pipeline extension and subsequent process improvements was to achieve a significant reduction in visible plume and foam. 3. The presentation showed the current trend to be substantially below the historical benchmark/target level. 4. SM also explained that the visible plume is influenced by ocean conditions, currents, wind and other natural factors. 5. Members nevertheless emphasised the importance of continued monitoring and of distinguishing between natural marine conditions and effects potentially attributable to the discharge	
10. DIVE VISIBILITY 1. The January–June graphs showed significant day-to-day variation, with some days of relatively high visibility and others with considerably lower visibility. There were also occasions where no information was available because no dive observations were undertaken. 2. Members noted the importance of interpreting the visibility data in context rather than relying on isolated observations.	
11. RIVER FLOW 1. SM noted that river flow had been low and that this presented an operational risk to Sappi. The presentation indicated a river flow of approximately 3.3 m³/s at the time represented in the data. 2. The Forum was advised that Comrie Dam was being monitored and that Sappi was maintaining releases in accordance with the relevant requirements. 3. DDS expressed strong concern that snowfall was being used as a reason for water levels and that the water crisis should not be treated merely as an operational issue for Sappi. 4. It was emphasised that local communities depend on the river and coastal environment for: • fishing; • washing; • cultural practices; • recreational activities; and • other livelihood and household uses. 5. BM further highlighted that decisions regarding water use and discharge should therefore consider community health, wellbeing and environmental justice, rather than only technical permit compliance. 6. It was also stressed that government authorities should have sufficient factual information before making decisions relating to increased discharge volumes or water-use licences.	

ACTION

7. CD responded that the reference to rainfall and snow was intended to describe factors influencing the river-flow trend and not to attribute Sappi's process performance to snowfall.
8. CD stated that the broader water crisis is a serious regional and national issue and that it is monitoring water availability because insufficient water could ultimately affect plant operations.
9. It was also noted that Sappi is participating in broader discussions involving government and industry regarding potential future water-supply solutions.
10. ZM advised that existing processes require public consultation for relevant water-use licence applications and that community comments are considered as part of the decision-making process.
11. It was explained that where objections are raised, the department's process requires engagement between the applicant and affected community stakeholders before the relevant licence decision is finalised.

12. PERMIT

1. SM provided an update on the Coastal Water Discharge Permit amendment.
2. DFFE Oceans and Coasts issued the amendment on 29 June 2026.
3. The amendment increased the permitted effluent volume while simultaneously tightening several quality limits.
4. The revised limits are:

Parameter	Previous limit	New limit
Effluent volume	150,000 m ³ /day	160,000 m ³ /day
TDS	18,000 mg/l	15,000 mg/l
COD	18,000 mg/l	15,000 mg/l
Lignin	6,000 mg/l	5,000 mg/l
Electrical conductivity	2,000 mS/m	1,500 mS/m
5. SM explained that Sappi had requested an increased maximum discharge volume but accepted that the increase would be accompanied by tighter quality limits.
6. DDS questioned whether the increased discharge volume could result in greater impacts on the receiving environment and raised concern that human health and community wellbeing should be explicitly considered.
7. It was argued that:
 - people swim and fish in the receiving environment;
 - communities use the river and coastal areas;
 - environmental impacts can have consequences for people and marine life; and
 - increased discharge should therefore be considered together with potential human-health impacts.
8. Sappi clarified that the amendment to the discharge volume does not constitute an increase in the authorised abstraction from the river.
9. RO specifically sought confirmation that the increase in discharge volume at the end of the marine pipeline was not linked to an increased water abstraction. Sappi confirmed that there was no corresponding increase in the authorised river abstraction.
10. It was further explained that the increased discharge allowance provides flexibility for operational variability/upset conditions, while the tighter quality limits reduce the permitted pollutant load for several parameter.

13. CORRESPONDENCE

1. DDS asked if the SDCEA comment had been sent to the Department. RO confirmed it had and been acknowledged by the Department.

14. COMMUNITY ISSUES

		ACTION
SAPPI CAF NOTIFICATIONS - BM asked if the SAPPI CAF Meetings were advertised, and expressed concern that the number of people attending appeared low compared with the number of people potentially affected by environmental issues. - RO confirmed that: - meeting dates are advertised annually in a local community newspaper; - meeting invitations are circulated by email; - SMS notifications are also used; and - evidence of the newspaper advertisement is retained. - BM followed up that some neighbouring communities are economically disadvantaged and may not purchase or regularly access newspapers. - BM proposed that additional communication methods be considered, including: - flyers; - posters at local shops; - direct community notification; - newsletters; and - potentially door-to-door notification. - The proposal was supported in principle, and Sappi indicated that community notification methods had been used previously and could be considered again.		SAPPI and RO to follow up
COMMUNITY HEALTH AND ENVIRONMENTAL JUSTICE - BM raised a broader concern that the Forum's compliance reporting could appear to focus predominantly on compliance with permit conditions without sufficiently considering the lived experience of surrounding communities. - He argued that a holistic approach should include: - environmental impacts; - community health - wellbeing; - concerns reported by residents; - impacts on people using the river and ocean; and - mechanisms through which affected people can raise concerns. - He emphasised that people who may lack data, airtime or access to formal communication channels should not be excluded. - BM stressed that their primary concern was environmental protection and human wellbeing, rather than Sappi's corporate social investment (CSI) activities. He noted that there can be tensions when they challenge a corporate entity on an environmental matter at the same time a person in the forum is looking for CSI support. - A proposal was made that environmental and community-health concerns should, where appropriate, be discussed through a platform specifically focused on environmental impacts, rather than being combined with CSI and economic-opportunity discussions. This was clarified as BM expressed concern that combining the two could create tension where community representatives are expected to challenge environmental impacts while simultaneously engaging with Sappi regarding CSI opportunities. - SM acknowledged the concern but explained that Sappi also needs to engage communities on broader matters and that there may be value in maintaining a platform where communities can understand both performance and community activities. - It was agreed that the issue warranted further consideration. - SM indicated that Sappi was exploring participation in another community forum that could potentially provide a more suitable platform for broader community/CSI issues. - CD also undertook to discuss the matter further with relevant stakeholders.		SAPPI to follow up

	<u>ACTION</u>
SAPPI Non- Compliance Query 1. Lindo (online participant) raised a historical matter relating to Sappi's previous environmental non-compliance and associated enforcement action/fine. 2. The discussion reinforced the request that historical environmental issues and their consequences should be communicated more widely to affected communities so that residents can understand: • what happened; • what corrective measures were implemented; • what the current status is; and • how similar impacts are being prevented. 3. The matter was linked to the broader request for a dedicated platform for discussing community health and environmental impacts. ESTUARY SILTATION 1. DN raised concerns regarding sediment accumulation/siltation in the river and estuary. 2. He suggested that sand accumulation may be affecting the river mouth and could contribute to periods where the mouth becomes closed or restricted. 3. He also raised the issue of historical and current sand mining and its potential effect on the river system and coastal sediment balance. 4. CD explained that estuary siltation and sediment movement are, to a significant degree, natural processes. 5. He referred to historical flood events which have resulted in major scouring and changes in river depth and sediment distribution. He explained that the Umkomas/Mkomazi system naturally carries substantial sediment loads and that sediment deposition and estuary/delta formation occur as part of the natural system. 6. He nevertheless acknowledged that human activities can interfere with natural sediment processes. 7. The discussion distinguished between: • natural sediment transport; • sand mining/removal; • alteration of riverbanks and channels; and • broader catchment impacts. 8. DN maintained that sand mining should not be dismissed because removal of sediment can affect the river and beach system. 9. ZM advised that concerns regarding potentially unlawful environmental activities should be referred to the relevant departmental enforcement structures.	All to action if noted
15. ANY OTHER BUSINESS Umkomazi Management Plan 1. AM noted that the MPA Management Plan was due to be gazetted and he would share the notice to RO for onward sharing to the stakeholders. 2. There were discussions that the public participation process for the Management Plan had not been comprehensive and inclusive. 3. DN stressed the importance of ensuring that affected communities are properly informed and able to participate in the process. He expressed concern about instances where communities may feel excluded from environmental planning and decision-making. He requested that stakeholders be informed as early as possible so that community organisations can assist in distributing information and encouraging participation. 4. BM subsequently asked whether there is a formal complaints process or email ad-	

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dress through which communities can raise concerns about inadequate public participation. 5. AM advised that queries regarding the management-plan process should be directed to the responsible department and that his contact details had previously been circulated as part of the stakeholder process. He also confirmed that the gazetting process would provide another opportunity for public input. 6. AM would share info to RO for onward sharing to the Forum.	AM and RO to follow up
16. PROPOSED MEETING DATES FOR 2026 5 February 2026 7 May 2026 6 August 2026 5 November 2026 1. RO noted that as the next meeting is the final meeting for the year, there will be a lunch. Please could all stakeholders ensure they RSVP as this will be needed for the catering.	
17. CLOSURE 1. There being no further discussions, the meeting closed at 12.00	

Read and confirmed this day of 20

Facilitator

ANNEXURE

The following link to the folder containing the presentations referred to above will be available in Phelamanga Projects' Dropbox until the next meeting of the LAF.

PRESENTATION	LINK	FILE SIZE
Sappi SAICCOR – Presentation	https://www.dropbox.com/scl/fi/hfo12jidrbavqw93wc08w/Sappi-Saiccor-CAF-06-August-2026.pdf?rlkey=gauwj5pv2d4xuh1okkdugaquc&dl=0	3 810 KB