



Managing Director Report

January 2025 – December 2025

INTRODUCTION

The Richards Bay Clean Air Association (RBCAA) continued to play a vital role in supporting air quality management and stakeholder engagement in the Richards Bay region during the period January to December 2025.

This report provides an overview of the Association's activities, performance, and governance, highlighting the effective operation of the ambient air quality monitoring network, strong financial and quality management practices, and active participation in regulatory and environmental processes.

While the year was marked by notable achievements, including successful ISO 9001 recertification and progress on key strategic initiatives, ongoing air quality challenges underscore the importance of sustained collaboration and proactive intervention.

The RBCAA remains committed to providing credible data, supporting authorities, and working with stakeholders to improve air quality and protect public health in the region.

MEMBERSHIP AND DIRECTORSHIP

The RBCAA, through the continued dedication of its members and directors, functioned effectively throughout the period under review. We wish to express our sincere and heartfelt appreciation to all members of the Association for their commitment, hard work, and willingness to serve in running the Association and ensuring that its objectives were met during 2025.

The Chairmanship remained with Mrs. C. Webb throughout the year, with the continued support of Mrs. S. Camminga and the Board of Directors. While there was some movement within the directorship, membership of the Association as of 31 December 2025 remained at 18.

The ten (10) Directors serving on the Board were voted into office at the RBCAA Annual General Meeting on 22nd August 2025.

- **Corporate:** Mondi, S32, RBCT, Foskor, RBM, Mpact, Grindrod
- **Non-corporate:** S Camminga Founder Member, ZFPA, F Schmidt Honorary Member

The Directorships were updated and registered with CIPC. The RBCAA Board of Directors met four (4) times during 2025, included was a strategy session to agree on the Associations Objectives and Targets for 2026.

Office Bearers were elected at a Board of Directors meeting held on 17 September 2025 and served in their respective roles diligently throughout the period.

For detailed information regarding Members, Directors and Office Bearers please see the Annual Membership and Directorship Report.

MANAGEMENT COMMITTEE

The Management Committee (MANCO) met on 12 occasions during 2025, in accordance with its monthly meeting requirement, and successfully fulfilled its mandate for the period under review. Its primary objective is to ensure that the daily operation of the air quality monitoring network was maintained to the highest standard and in full compliance with the ISO 9001 Quality Management System.

The Committee's responsibilities amongst others include oversight of the continuous monitoring network and the Quality Management System, evaluation and management of service providers. It is also responsible for managing and approving operational and capital expenditure in line with approved budgets, preparing annual operating and capital budgets for Board approval.

The Chairperson of the MANCO is a director appointed by the Board of Directors and Mrs. S. Camminga remained Chairperson for the reporting period.

I would like to thank Sandy Camminga and the MANCO team for their commitment and sound decision making.

For more information regarding MANCO please see the Management Committee Chairperson Report.

NETWORK OPERATION

During 2025, the RBCAA monitoring network operated reliably and was maintained in accordance with approved calibration, maintenance, and weekly inspection schedules. Data capture across the network was consistently high, with all stations achieving between 98% and 100% data capture, exceeding SANAS requirements, except for Brackenheim PM_{2.5}, which achieved 87% due to the late commissioning of the E-Sampler in February 2025. Overall network performance remained robust, supported by regular monitoring and reporting by AIMS.

The monitoring infrastructure remained in good condition following a structural audit conducted in August 2025, with identified corrosion and minor defects addressed through maintenance works completed in November 2025. Electrical upgrades, inverter maintenance, and new Certificates of Compliance were completed across all sites. The Airgradient network continued to experience elevated sensor failures attributed to the corrosive environment, while dust fallout monitoring highlighted data quality challenges and exceedances, resulting in a strategic reduction of monitoring sites from six to four.

Air quality results for 2025 indicated non-compliance at certain stations for PM_{2.5}, PM₁₀, SO₂, and TRS, largely linked to specific industrial and operational incidents. Complaints during the year were strongly incident-driven, with April accounting for the majority following a single event. Despite these challenges, the network continued to deliver reliable, high-quality data to support effective air quality management and regulatory reporting.

For detailed information regarding the Network Operation please see the Management Committee Chairperson Report.

FINANCIAL MANAGEMENT

MANCO is responsible for the financial management and implementation of the annual budget. Members were invoiced in January 2025, and by year-end all members were in good standing, with an outstanding balance of R26 800 relating to Tongaat Hulett, which is expected to be written off following the company's application for liquidation.

All items approved under the 2025 capital expenditure budget were successfully procured. The RBCAA 2026 budget was approved by the Board on 17 September 2025 and was prepared with input from the Association's accountants, the Chairperson of Manco, and consultants, considering strategic priorities, equipment replacement, and completion of IT upgrades.

The budget reflects a 5.2% year-on-year increase, a 10% increase in membership fees, a 6% increase in consulting fees, and an anticipated carryover of R1.25 million remained as contingency to ensure the Association can meet its financial obligations. Provision was made for capital expenditure of R839 540, continuation of key monitoring and modelling projects, and the third phase of the Envitech SLA and software upgrade project.

Thank you to MANCO, Mrs. S. Camminga and Mrs. N. Waller and her team for their sound financial management in 2025.

For detailed information regarding Finance Management please see the Management Committee Chairperson Report.

QUALITY MANAGEMENT SYSTEM (ISO 9001 CERTIFICATION)

The RBCAA, which was first ISO 9001 certified in March 2023, which continues to support the Association's commitment to consistent and effective quality management.

The RBCAA maintained an effective and well-functioning Quality Management System throughout 2025 under the oversight of the Quality Committee. Two internal audits were conducted during the year with no non-conformances raised, while identified risks related to traffic, fire hazards, and minor structural issues were promptly addressed through corrective actions and planned maintenance.

The annual management review confirmed that the quality system remained suitable, adequate, and effective, supporting alignment between the Board, MANCO, and operational activities.

An external ISO 9001 re-certification audit conducted in September 2025 raised no non-conformances and resulted in successful recertification valid until March 2029, with minor improvement requests and observations addressed through updates to the Quality Manual and procedures.

Progress against 2025 organisational objectives included successful expansion of the Airgradient network and initiation of the website upgrade, while the emissions inventory update was deferred to 2026. Improvement requests and non-conformances during the year were effectively managed, and organisational objectives for 2026 focus on improving air quality data communication, completing particulate dispersion modelling, and exploring the feasibility of a health study.

Congratulations to the Quality team and special thanks to AIMS for their exceptional management of the Quality System.

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) COMMENTING COMMITTEE

During the reporting period, the RBCAA EIA Committee, chaired by S. Camminga and comprising industry and honorary members, reviewed and commented on a wide range of Environmental Impact Assessment (EIA) and regulatory applications in the Richards Bay region. Guided by its terms of reference and assessment criteria, the Committee evaluated air quality impacts, modelling adequacy, cumulative effects, compliance with standards, and potential health implications, while also validating the use of RBCAA data and participating in stakeholder processes.

Several major projects were assessed, including wind and gas power developments, mining and prospecting rights, bulk handling facilities, pipeline infrastructure, and amendments to atmospheric emissions licences.

Notably, the RBCAA did not support the Eyamakhosi Resources Prospecting Right Application due to the risk of significant and irreversible environmental impacts on the Richards Bay Nature Reserve and Estuary, nor the Hillside Aluminium Minimum Emissions Standard amendment, citing concerns about precedent setting and weakened emission controls.

The Committee remains vigilant, particularly regarding developments that could increase particulate and coal dust emissions, recognising the documented negative impacts on air quality in the Richards Bay area.

Thank you to Sandy Camminga for her role in chairing the EIA Commenting Committee. More information regarding the EIAs is available in the EIA Committee Chairperson Report.

COMMUNICATIONS

During the period under review, Sandy Camminga served as the RBCAA Communications Officer, with responsibility for raising the profile of the Association and strengthening communication between the RBCAA, its members, authorities, and the broader community. This role focused on building collaborative relationships with local and district municipalities, encouraging active member participation, engaging potential new members and developers, and maintaining a strong presence at environmental forums and stakeholder meetings.

WhatsApp remained the primary communication platform for complaints and engagement, with the Communications Officer actively monitoring multiple community and authority groups, including an RBCAA-initiated Authorities group that continues to be effective for rapid issue notification.

The RBCAA maintained active participation in numerous monthly and quarterly environmental and disaster management forums and remained a member of the National Association for Clean Air (NACA). Air quality data was validated daily by AIMS and uploaded to SAAQIS, although challenges were identified relating to data representation and system functionality, which were escalated to the South African Weather Service.

The RBCAA website continued to host key policies, procedures, and reports; however, reliance on Envitech for support affected response times and mobile site functionality. In line with the 2025 objective, a new website was developed with a local service provider and was successfully launched at the AGM on 17 April 2026.

Special thanks are extended to Sandy Camminga for her dedicated service as Communications Officer, a role that often presents significant challenges and demands a high level of commitment. For more information, please refer to the Annual Communications Officer Report.

MANAGING DIRECTORS' COMMENTS

I would like to extend my sincere appreciation to our members, directors, and office bearers for their continued commitment, dedication, and support throughout 2025. Your active participation and collaborative efforts have been fundamental to advancing the Association's objectives and maintaining the credibility and integrity of our air quality monitoring network and stakeholder engagement.

The year under review was one of both meaningful progress and significant challenges for the Richards Bay Clean Air Association (RBCAA). The successful implementation of several key initiatives reflects our ongoing commitment to innovation, strong governance, and continuous improvement. At the same time, persistent air quality concerns remain a critical issue.

Increases in PM₁₀ exceedance days and TRS-related complaints, largely driven by industrial incidents, underscore the need for improved collaboration, accountability, and resourcing across all stakeholders. Of particular concern is the growing impact of dust emissions from coal stockpiles, transport, and handling activities, given the well-established links between particulate pollution and public health. These impacts continue to affect surrounding communities and infrastructure and must remain a priority for collective action.

The RBCAA's Quality Management System has continued to mature, as evidenced by strong audit outcomes, while sound financial management has been maintained through effective budgeting and strategic capital investment planning. The Association remains a key support to authorities by providing credible, independent air quality data and has sustained a strong public presence through participation in forums, media engagement, and strategic partnerships.

Once again, I thank all members, directors, and office bearers for their invaluable contributions throughout the year. Your ongoing support is central to our shared commitment to cleaner air and a healthier Richards Bay. As we move into 2026, we do so with renewed focus and determination.

Candice Webb

C Webb
Managing Director
13 April 2026



ANNUAL REPORT

MEMEBERSHIP \ DIRECTORSHIP

January 2025 – December 2025

MEMBERSHIP

The total number of members as at 31 December 2025 remained at 18;

16 Corporate:

Bidvest Tank Terminals
Felixton Cane Growers Assoc
Foskor
Grindrod Terminals
Hulamin
Mondi S A Division
Mpact Paper
NCT
Richards Bay Alloys
Richards Bay Coal Terminal
Richards Bay Minerals
RBIDZ
South32
Tongaath-Hulett Sugar
Transnet National Ports Auth.
Transnet Port Terminals

2 Non-Corporate:

Sandy Camminga (Founder Member)
Zululand Fire Protection Association

DIRECTORSHIP

The following 10 **Directors** were in office at the end of December 2025;

Corporate directors		Non-corporate directors	
C. Webb (Managing Director)	Mondi	T. Robert	Zululand Fire Protection
S. Msane	Foskor	S. Camminga	Founder Member
L. Molebale	South 32		
S. Ndaki	RBM	F. Schmidt	Honorary Member
S. Shezi	RBCT		
M. Odayar	Mpact		
V. Ndlovu	Grindrod		

Directorships were updated and registered with CIPC.

The RBCAA Board of Directors met four (4) times during 2025;

- 10th April
- 14th August
- 17th September
- 19th November – Strategy Session

The following Office Bearers were elected at a Board Of Directors meeting held on 17th September 2025.

Office Bearers 2025:

- **Managing Director:** Candice Webb
- **Chairperson Management Committee:** S Camminga
- **Chairperson Special Projects Committee:** C Webb
- **Chairperson EIA Committee:** S Camminga
- **Communications Officer:** S Camminga
- **Secretariat:** S Camminga

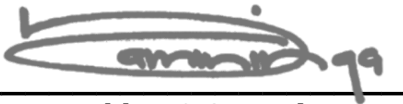
2025 ANNUAL GENERAL MEETING

The Annual General Meeting of members was held on 22nd August 2025. The following nine (9) members were elected to the Board of Directors;

Corporate: Mondi, S32, RBCT, Foskor, RBM, Mpact, Grindrod

Non-corporate: S Camminga Founder Member, ZFPA

F Schmidt was co-opted as an honorary capacity to fill the 10th vacant seat, based on his contributions to the RBCAA as a member of the Quality Team.



Prepared by: S Camminga
05 April 2026



ANNUAL REPORT

MANAGEMENT COMMITTEE CHAIRPERSON

January 2025 – December 2025

Terms of Reference

To ensure that the daily operation of the monitoring network remains of the highest quality and standard and meets the ISO 9001 Quality Management System requirements.

Main Functions

- Management of the continuous monitoring network
- Management of the Quality System
- Management and Evaluation of Service Provider in terms of deliverables
- Delivery of Monthly and Annual Reports
- Management and approval of expenditure as allocated in the operational and capex budgets
- Preparation of annual operating and capex budgets for approval by the Board
- Invoicing and collection of membership fees and pollution levies
- Management of the complaints system
- Management of the RBCAA website

The Chairman of the Management Committee (Manco) is a Director and is appointed by the Board of Directors. S Camminga remained the Chairperson of Manco for the reporting period.

The management team is required to meet monthly and reports directly to the Board of Directors. The Chairperson of Manco is responsible for providing regular feedback to the Board of Directors

Industry Members are required to provide feedback to Manco on a monthly basis.

The **Management Committee** met 12 times (monthly) during 2025.

Members;

Corporate:

South32
Foskor
Grindrod
Mondi
Mpact
RBCT
RBM
RBIDZ
Richards Bay Alloys

Non-Corporate:

S Camminga (Chairman – Founder Member)

Accountants:

Waller Gilliver

Consultants:

AIMS

Transnet National Ports Authority
Transnet Port Terminals
Tongaat-Hulett
Bidvest Tank Terminals
Hulamin
Felixton Cane Growers
NCT

NETWORK OPERATION

The following are highlighted for the 2025 reporting period;

The network was maintained according to the network calibration and maintenance schedule as well as weekly station checks.

Data Capture

Data capture at all stations was excellent with ALL stations, except Brackenhams PM2.5, recording 98% - 100% which far exceeds the SANAS data capture requirement of 90%.

The data capture percentage of 87% recorded at Brackenhams was due to the E-Sampler having only been commissioned in the February 2025.

Analysers

The RBCAA network comprises the following instruments;

- Nine (9) SO₂ Analysers
- Six (6) E-Samplers ; 4 measuring PM_{2.5} and 2 Measuring PM₁₀
- Five (5) TRS Analysers; The 5th analyser was donated by Mondi and has been installed at Brackenhams.
- Two (2) Teoms; During 2025 both measured PM₁₀ (eSikhaleni & Richardia). Richardia has this year been converted to measure PM_{2.5} in March 2026.

Weekly station reports are submitted by AIMS to the Chairperson of Manco.

These reports provide the following information;

- Analyser performance
- Analyser repairs
- Faulty equipment
- Purchase order tracking
- Airgradient Calibrations
- Airgradient Sensor failures/replacements

Hokmah Structural Audit

Inspection was undertaken on 19 August 2025.

Findings: The overall condition of the structures is still good. It was observed that maintenance had recently been done on most structures, including the painting (for corrosion protection) of steel elements. New steel pipes were installed to replace those that were in poor condition.

The following issues were observed by Hokmah and were addressed during the maintenance undertaken by GJ Civils;

- Airport: Corrosion on the mast-tower to be repaired with at least 5mm sleeves welded on.
- Scorpio station, we recommend that a proper shackle on the cable tension screw be installed, replacing the wire that is currently being used.
- Harbour West station: Leakage was seen resulting from bolted connections. Sealing around the bolts is required to prevent leaks.
- General: base plates of the mast on all stations have slight to moderate corrosion. This issue needs to be monitored in the next inspection.
- No structural defects were identified in other stations.
- Non-Civil/Structural Items:
 - ✓ Harbour West station: The floor of the prefabricated container is not stable. We recommend that a supplier or manufacture be appointed to replace all panels that are not in good condition.
 - ✓ eSikhaleni, Felixton, Richardia: The wheel axle structure for mobile prefab container indicates slight to mild corrosion, particularly at eSikhaleni station. We recommend appointing a mechanical contractor to assess, repair, or replace components as necessary.

Station Maintenance

GJ Civils inspected the RBCAA monitoring stations on 2025/10/15 and 2025/10/16. Maintenance work (corrosion protection and structural) was conducted from 10 – 21 November 2025.

Final report received from GJ Civils on 2025/11/27.

Airgradient Network

The network consists of 10 monitors. Monthly reports are produced by AIMS and presented at the monthly Manco meetings.

The network is experiencing a significant number of TVOC and NOx sensor failures due to corrosion. The OEM has not been able to provide a reason other than to point to a corrosive environment.

Electrical Infrastructure

- Inverter maintenance and system upgrades were undertaken
- New COCs issued for all the stations.

Envitech Service Level Agreement (SLA)

The RBCAA has been attempting to finalise an SLA with Envitech since 2024.

- January – December 2024: Numerous communications between AIMS and Envitech. Quote was received from Envitech however the RBCAA required a detailed document outlining the provision of services in order to get Board approval. This was not forthcoming.
- 7 April 2025: The RBCAA requested a meeting between RBCAA, AIMS and Envitech to discuss RBCAA SLA requirements. Envitech committed to providing the RBCAA with an SLA.
- 8 May, 13 May, 30 May, and 1 July 2025: RBCAA reminders to Envitech.
- 21 July 2025: Draft SLA received. (Attached for ease of reference)
- 20 August 2025: RBCAA requested the following inclusions;
 - ✓ Response and Resolution times for support requests
 - ✓ An escalation procedure
 - ✓ Which software is supported
 - ✓ Points of contact for support
 - ✓ An addendum detailing the costs. By attaching this as an addendum we do not need to amend the entire SLA if costs change.
- 17 Sept, 15 Oct, 12 Nov, 5 Dec 2025 and 21 Jan 2026: RBCAA reminder requests to Envitech for revised SLA.

Current status: Envitech has proposed a Maintenance Software Subscription and has requested the RBCAA to provide a list of software.

Dust Fallout Monitoring

The RBCAA dust fallout network is managed by Skyside. The monthly reports are reviewed and approved by Manco.

During 2025 the DFO network consisted of six (6) active sites. Four of the six buckets were relocated.

Richardia had no data for 3 consecutive months (Oct – Dec) due to contaminated buckets. Skyside were requested to investigate and the location was adjusted.

There were 4 Residential and 3 Non-Residential exceedances during the January – December 2025 sampling period, which accounted for 6% and 4% of recorded data, respectively. This is not considered acceptable in terms of the National Dustfall Regulations.

Based on the 2025 data a decision was taken to reduce the monitoring sites to four; Richardia, Harbour West, Aquadene Primary and MDI Alton South.

IT System

ITPlus continues to manage the RBCAA IT system and provides monthly reports covering:

- Server status
- Personal PCs
- Dark web threat mitigation
- Security awareness training
- Overall security

Specific IT Projects

- UPS systems were installed on all seven (7) PC data loggers to prevent database corruption during inverter switching.
- The project to upgrade all routers to be 4G/LTE compliant was completed in 2025.
- Felixton and Richardia were upgraded to PC dataloggers with EnviDAS Ultimate software. This leaves on ESikhaleni to be upgraded.
- The RBCAA's virtual server's Microsoft Windows operating system reaches end of life on 12 January 2027. The rebuild of the virtual machine is planned for September/October 2026.

Complaints

Complaints are detailed in the 2025 Annual Report produced by AIMS; The following is highlighted;

Complaints during 2025 were strongly incident-driven: In April a technical failure at Mondi accounted for 182 complaints of the total 282 complaints.

March 2025:

- Tronox – red dust from the Fairbreeze mine affecting Mtunzini (17 complaints).
- Mondi – over-pressurisation of the CPX tank (16 complaints).

April 2025: ▪ Mondi - ruptured bursting disc on the non-condensable gas line to the flare (182 complaints).

June 2025: ▪ Mondi - non-condensable gas leaks (10 complaints).

September 2025:

- City of uMhlathuze – overflow of untreated effluent from the sewer reticulation infrastructure (12 complaints).
- Transnet Port Terminals – coal dust (14 complaints).

October 2025: ▪ Mondli – secondary effluent treatment plant (14 complaints)

Air Quality

Air quality data and exceedances are highlighted in the 2025 Annual Report produced by AIMS. The following is highlighted;

Particulate Matter (PM)

- PM_{2.5} Daily RSA Limit (40 µg/m³) was non-compliant at Brackenham (18 exceedances), Felixton (6) and Scorpio (8), and compliant at Harbour West (3).
- PM_{2.5} Daily WHO Guideline (15 µg/m³) was exceeded at Brackenham (165), Felixton (125), Harbour West (62) and Scorpio (117).
- PM₁₀ Daily 24-hour Guideline (45 µg/m³) was exceeded at CBD (5), eSikhaleni (13), Felixton (6), Richardia (39) and Scorpio (30).

Sulphur Dioxide (SO₂)

- SO₂ Daily RSA Limit (48 ppb) was exceeded at Scorpio which recorded eight (8) exceedances. The standard permits four (4) exceedances per site per year. Scorpio was therefore non-compliant.
- SO₂ WHO 24-hour guideline (15 ppb) was exceeded at Scorpio (67) and Harbour West (41), CBD (7) and Richardia (1).

TRS Exceedances

There are no South African standards for TRS.

The RBCAA monitors against the following;

- ✓ WHO 30-minute H₂S Guideline; and the
- ✓ MECP daily and 10-minute standards for the Pulp and Paper sector.
- TRS 10-minute MECP Limit (9.3 ppb) was exceeded at Felixton (218), CBD (107), Richardia (89) and eSikhaleni (39).
- TRS 30-minute WHO H₂S Limit (5.0 ppb) was exceeded at (204), CBD (143), Richardia (87) and eSikhaleni (75).
- TRS 24-hr-MECP Limit (10.1 ppb) was exceeded at CBD (1).

FINANCIAL MANAGEMENT

MANCO is tasked with the financial management and implementation of the annual budget.

Members were invoiced in January 2025, and at the end of the reporting period all members were in good standing with the Association.

The carryover unpaid amount of R26 800.75 arises from the Tongaat Hulett business rescue process, and will likely have to be written off given that THS has now filed an application for liquidation.

2025 CAPEX

ALL CAPEX items were purchased.

- 1 x SO₂ Analyser
- 1 x E-Sampler PM_{2.5}
- 1 x Inverter with battery

- 2 x Lithium Batteries for inverters
- 1 x TEOM Pump
- 2 x Thomas Pumps
- 4 x W-Link Routers

2026 Budget

The RBCAA 2026 **Budget** was approved by the RBCAA Board of Directors on 17 September 2025.

The budget was prepared by Waller Gilliver (Accountants) and Sandy Camminga (Manco Chairperson) with inputs from AIMS (Consultants).

The budget considered the strategic decisions taken by the RBCAA Board of Directors as well as equipment replacement requirements and completion of the monitoring stations IT upgrade.

Summary:

- The year-on-year percentage increase for 2026 is 5.2% compared to 7.3% in 2025.
- Membership fees were increased by 10%.
- A 6% increase was applied to consulting fees, which is the association's major operating expense.
- Available anticipated carryover from 2025 is expected to be R 1 254 339, a total of which is kept as a contingency.

The need to keep this amount as a contingency is to ensure the Association can meet its financial obligations as they become due. Certain obligations have major financial implications if they are paid late for example the SARS VAT, and the economic impact that we have on our service providers for the late payment of operational expenditure.

These funds will cover the Association's obligations during the period of invoicing and members going through their internal payment approval processes and other emergencies.

The budget includes the third phase of the special project (Envitech upgrades / SLA).

Capital expenditure items:

- 1 x SO2 Analyser R 386 550
- 1 x E-Sampler PM2.5 R 296 545
- 2 x E-Sampler Pumping Module R 75 000
- 2 x Thomas Pump R 36 445
- 3 x Temperature Gauge R 45 000

Total Capital Expenditure: R 839 540

Additional Items:

- Continuation of DFO monitoring project R 50 619
- Additional Met calibration R 118 207
- Particulate modelling R 93 619

Special Project: Envitech SLA and Software Upgrades - R187 968

QUALITY MANAGEMENT SYSTEM (ISO 9001 CERTIFICATION)

The RBCAA received certification in March 2023.

Committee Members:

C Webb (Chairperson)	A Garnica (AIMS)
F Schmidt	F Nel (AIMS)
S Camminga	
L Coetzee (AIMS)	

Audits

Internal Audit (1): 11th March 2025 eSikhaleni Station; Clean Audit, no findings

Internal Audit (2): 11th August 2025 Harbour West Station; No non-conformances raised. The audit identified risks related to traffic, fire, and structural damage.

- Risk: Trucks operating near the station; **Corrective action:** TNPA assisted by blocking off the area to prevent trucks from stopping and the RBCAA erected a chevron on the station fence.
- Fire: associated with uncut grass, dumping of tyres, and sulphur. **Corrective action:** TNPA assisted in having the area cleared.
- Potential Risk: The floor giving way underfoot in small areas. **Corrective action:** This was addressed during the station maintenance undertaken by GJ Civils.
- Maintenance: A small area of rust was evidenced inside the station, at the top corner. **Corrective Action:** Addressed during station maintenance undertaken by GJ Civils.

Management Review: Took place at the Manco meeting held on 25th August 2025. The primary purpose of this management review is to maintain alignment between the Directors and MANCO, and is undertaken annually. The quality system focuses on monitoring and is informed by audits (internal/external physical and systems).

The Management review meeting aims to get opportunities for improvement, the need for changes to the quality management system, the resource needs and the documented information

The quality system was deemed to be suitable, adequate, and effective in addressing the needs of the RBCAA and its customers/stakeholders

External ISO 9001 Re-Certification Audit: Took place on 12 September 2025. No non-conformances were raised. There were two Improvement Requests and one observation.

The documented system was seen to be well implemented and maintained including control over contractors which were conducted 6 monthly. Updating of the website and expansion of AirGradient stations were commendable.

The documented internal audit process could be more specific of when a non-conformance should be raised and when it could be attended too and closed out. Failure to raise non-conformances may result in incorrect data (trends) being presented during management review meetings.

Actions to be followed up at the next audit:

1. Although evidence was available to demonstrate management review inputs as required by the standard, RBCAA could review the Management review process as defined in the Quality Manual, par 9.3.1. Cognisance could be given to the various forums where this is discussed.
2. The instruction for weekly monitoring of stations as defined in AIMS-PR-QU-009 issue 7/22 rev 02 could be reviewed to ensure all records generated by AIMS is referenced.

Corrective actions implemented;

1. Two (2) Improvement requests – Expand section 9.3.1 of the Quality Manual (Management review) and add a missing reference to AIMS Weekly checks operational Procedure. These documents were amended and approved by the Quality Team.
2. One (1) Observation: AIMS Technical Assistant training was not formally documented. Training commenced in 2026.

Recommendation: A recommendation was made to the iCert approvals Board that RBCAA continues to comply with ISO 9001:2015 requirements.

The RBCAA received ISO 9001 Re-Certification which is valid until 11 March 2029

Quality Manual, Policies and Procedures

The latest revisions can be found on the RBCAA website <https://rbcaa.org.za>

- The quality team reviewed the Exceedances, Complaints and Succession and contingency plan procedures. The approved procedures are available on the RBCAA Website.
- RBCAA Quality requirements for 2025: Letters were sent to all Service providers notifying them of the RBCAA's requirements to comply with the Quality Management System.

Organisational Objectives 2025;

There were three (3) Organisational objects set for 2025

1. **Website Upgrade:** Develop a new, modern website. Engagement of a service provider and commencement on the design commenced towards the end of 2025. The project carried forward into 2026 with the objective being met.
2. **Update Emission Inventory:** This was not achieved in 2025 and has been carried forward to **2026**.
3. **Expansion of the Airgradient Network:** Expansion of network to establish 4 new monitoring sites. This has been achieved with sites established at; Empangeni (Eden Park Primary), Richards Bay Airport, Mtunzini and Meerensee.

Improvement Requests\Non-Conformances

A number of Improvement requests and non-conformances were raised during the reporting period relating to issues such as;

- Corrupted database at Scorpio due to a power spike
- SMS Alert System failure
- False exceedance alerts
- Airgradient TVOC and NOx sensor failures
- Non-conformances issued to 2 service providers, one for failure to present safety file before commencement of work and the other for failing to follow a work instruction.

Organisational Objectives 2026;

1. Development of an **RBCAA Air Quality Data Communication System**. Current system is run on Envitech software, who are based in Israel.
2. **Particulate Dispersion Simulations**. Require finalization of updated emissions inventory.
3. **Health Study:** Potential Objective - Feasibility and funding to be investigated.

COMMENT

Attendance by Manco members was good, however active participation remains a challenge.

The complaints and exceedance procedures are poorly complied with. This is a non-compliance in terms of our quality system and could result in findings during the external audit.

The absence of an SLA with Envitech has resulted in a reluctance on the part of Envitech to provide technical support even though the delay rests with them. The result is that dashboard and mobile website issues have not been resolved. In addition, we have not been able to get Envitech to provide a quote for software to upgrade the last station (eSikhaleni).

On the back of these challenges the RBCAA has resolved to look at options to develop an RBCAA Air Quality Data Communication System

Based on World Health Organisation (WHO) guidelines air quality within uMhlathuze is cause for concern, with exposure to increased levels of particulate matter (dust particles) in particular presenting potentially significant health impacts. In addition, the health effects associated with the synergistic effects of particulates and sulphur dioxide need to be understood.

The RBCAA has demonstrated a high standard of operational excellence, which bears testimony to the RBCAA's collective expertise and commitment to providing scientifically credible data.

This is not achieved by any other network in South Africa.



S CAMMINGA
Chairperson MANCO
05 April 2026



ANNUAL REPORT

EIA COMMITTEE CHAIRPERSON

January 2025 – December 2025

EIA Committee Members:

S Camminga (Chairperson)
C Webb (Mondi)
F Schmidt (Honorary Member)
T Nkosi (RBCT)

Terms of Reference:

- To comment on and make recommendations regarding proposed developments in the area.
- To evaluate air quality impacts.
- To validate the use of RBCAA data and interpretation thereof.
- To stipulate requirements of the RBCAA in terms of membership and expansion of the monitoring network.
- To attend and participate in Public \ Stakeholder meetings.

Assessment Criteria:

- Whether air emissions are adequately reported.
- Whether cumulative impacts are taken into consideration.
- Whether the modelling has been done to a reasonable standard, using an acceptable Model with local data.
- Whether the ground level concentrations comply with standards\guidelines.
- Whether health impacts have been assessed.

RBCAA EIA Committee Reviewed and Commented on the following EIAs during the period under review;

1. **Gagasi 800MW Offshore Floating Wind Farm;** Draft Scoping Report and Specialist Studies have been completed. However, it is now being proposed as a fixed and not floating wind farm, so the specialist studies need to be amended. New application expected Mar/Apr 2026
2. **Jindal Melmoth Iron Ore Mine;** The status of this application is unclear. The Scoping Report was accepted by DMRE on 2025-05-21. No further communications and EAP does not respond to requests for information.
3. **Zululand Energy Terminal:** Gas Transmission Pipeline to connect to the Port of Richards Bay, Lilly Pipeline (Joint Venture Vopak & Transnet Pipelines); This application was withdrawn (2025-08-21),
4. **Eyamakhosi Resources - Prospecting Right Application;** The RBCAA submitted comments on the DSR on 2025-06-05. The application period lapsed, so the draft BAR was reissued with comments due on 2026-01-12. The RBCAA submitted comments on 14 Jan.

5. **THMM – Multi-commodity Prospecting Right Offshore of Richards Bay;** Scoping and EIA phases were undertaken during 2025. RBCAA submitted comments on 21 January 2026.
6. **Eyamakhosi Resources - Dry Bulk Commodities Storage and Handling Facility;** RBCAA submitted comments on the DSR on 2025-08-11. In January 2026 EAP confirmed that EIA is still underway.
7. **LNG Hub Richards Bay (Pty) Ltd - Gas (LNG) Import, Regas and Distribution Depot (IRDD);** Environmental Authorisation granted was granted on 12 January 2026. An appeal was lodged on the 2nd of February by the Centre for Environmental Rights on behalf of Groundwork, South Durban Environmental Alliance Urban and Green Connection.
8. **Phakwe Richards Bay Gas Power 3 (Pty) Ltd - Connection Infrastructure;** This application only reached BID phase and has subsequently been withdrawn in 2026.
9. **Petal Path Trading – 1740MW Combined Cycle Power Plant & Associated Infrastructure;** The RBCAA submitted comments the DSR on 2025-09-08. The RBCAA met with Airshed on 27 November to discuss inputs into the baseline for the air quality assessment. EIA timeline amended (15 Jan notice) to allow additional investigations and public consultation.
10. **Notice Of Variation and Renewal of Atmospheric Emissions Licence for Richards Bay Alloys (Pty) Ltd;** The comment period ended on the 11th of November. The RBCAA reviewed the application and submitted comments. Licence was issued 19 Jan; expiry 20 Jan 2031.
11. **UGESI Thermal Power Plant on the Remainder of Erf11445 Richards Bay, Gas Pipeline and Connecting Infrastructure;** Still at BID phase. Comment submitted 3 Dec (non-support of diesel alternative)(2026-01-30). The draft scoping report is in the process of being compiled.
12. **Hillside Aluminium Section 12(A) Minimum Emissions Amendment Application.** The RBCAA submitted comments on 19 January 2026.

COMMENT

The RBCAA did not support Eyamakhosi Resources Prospecting Right Application. The RBCAA is of the opinion that the proposed mitigation measures will not prevent significant irreversible environmental impacts, which will have catastrophic consequences on the Richards Bay Nature Reserve and Estuary should mining proceed.

The RBCAA also did not support the Hillside Aluminium Section 12(A), Minimum Emissions Amendment Application. The RBCAA submitted that the relaxation of the MES to simply facilitate compliance of intermittent exceedances at Hillside not only sets a dangerous precedent but will lead to the relaxation of controls

The negative impacts of particularly coal dust emissions have been well documented with no meaningful mitigation having been evidenced. The EIA Committee must remain vigilant with regards to applications that will contribute to the particulate load in Richards Bay.



S CAMMINGA
EIA Committee Chairperson
05 April 2026



ANNUAL REPORT

COMMUNICATIONS OFFICER

January 2025 – December 2025

The Communications Officer for the period under review was Sandy Camminga

Role of the Communications Officer

The role of the Communications Officer is to raise the profile of the RBCAA, by improving communications between the organisation and the community.

This role includes;

- Strengthening working relationships with the Local and District Municipalities with a view to building collaborative partnerships.
- Encouraging our own members to actively participate in the activities of the Association and to continuously strive to improve their environmental performance.
- Engaging with potential new members and developers.
- Maintaining a high profile through active participation in workshops and forum meetings.

WhatsApp remains the primary communication tool. Almost all communications\complaints received by the RBCAA are received via WhatsApp.

RBCAA Communications Officer has joined and monitors the following **WhatsApp Groups**;

- Authorities Environment
- Richards Bay Service Delivery
- A12 Chitchat
- Disaster JOC
- Municipal Issues
- Alton Group
- Q&A (Questions & Answer)
- Ward 2
- Sewage Complaints

The Authorities WhatsApp group created by the RBCAA remains effective for the immediate notification of complaints and environmental issues to the Authorities .

Monthly & Quarterly Forums attended by the Communications Officer;

- Mpact Environmental Forum
- Tongaat Hulett Environmental Forum
- RBCT Environmental Forum
- TNPA Environmental Forum
- TPT Environmental Forum

- BTT Environmental Forum
- Mondi Environmental Liaison Forum
- Foskor Environmental Forum
- Industrial Development Zone (IDZ), Environmental Review Committee (ERC)
- Mhlathuze Effluent Pipeline Forum
- South32 Quarterly Environmental Forum
- uMhlathuze Municipality Disaster Management Advisory Forum
- uMhlathuze Municipality Industrial Disaster Management Forum
- Mhlathuze Catchment Management Forum
- DWS JOC
- KCDM Solid Waste Disposal Facility Monitoring Committee

NACA Membership:

The RBCAA remains a member of the National Association for Clean Air (NACA).

South African Air Quality Information System (SAAQIS)

RBCAA data is validated daily by AIMS and uploaded to SAAQIS daily.

SAAQIS, provides a common platform for managing air quality information in South Africa. It makes data available to stakeholders including the public and provides a mechanism to ensure uniformity in the way air quality data is managed i.e. captured, stored, validated, analyzed and reported on in South Africa.

SAAQIS provides real-time ambient air quality data and is managed by the South African Weather Service (SAWS) and the Department of Forestry, Fisheries and the Environment,

The RBCAA has identified a number of issues relating to the management of RBCAA data which is validated and uploaded by AIMS on a daily basis. The RBCAA has established that SAAQIS invalidates SO₂ data above a certain threshold which has resulted in a mis-representation of the RBCAA data.

In addition, the SAAQIS site which uses the same Envitech software as the RBCAA, is not correctly depicting RBCAA stations. This has been communicated to SA Weather Service for assistance.

Website

Policies, Manuals and Procedures are available on the website, together with monthly, operational and annual reports, as well as media publications.

Envitech Maintenance Agreement as discussed in the Manco report this has still not been finalised. This together with our reliance on support from individuals based in Israel has negatively affected resulted in a poor support and response times from Envitech.

Mobile Website is not functional. Dependant on assistance from Envitech.

Main Website (Live data) is fully functional, with some improvements still to be implemented by Envitech.

New Website: The development of a new look website was set as an objective for 2025. The RBCAA engaged the services of Alliance Graphics, based in Richards Bay. The Quality team reviewed and provided inputs at various stages of development. The site is ready to go live and launched at the AGM on 17 April 2026.

COMMENT

Engaging with the community remains challenging.

Direct engagement with complainants has created a better understanding amongst the community of the role the RBCAA plays, and that we are not a regulatory body. However there is still an expectation that the RBCAA should be taking legal action against polluters to prevent air pollution and protect public health. It has also emerged that there is a perception that the RBCAA is a lobby group. This is particularly difficult to manage.

The RBCAA has continued to foster a good working relationship with the authorities, and the strong collaborative partnership that has been developed over the past few years remains.

The Authorities still rely extensively on RBCAA data to fulfil their monitoring and compliance mandate.

RBCAA data is used and relied on by Air Quality Specialists undertaking impact assessments for proposed developments within uMhlathuze. This data is being accessed at no cost.

The RBCAA should copyright their data and information and consider providing access to data in a way that generates a revenue stream.

A handwritten signature in dark ink, appearing to read 'S Camminga', is written over a horizontal line.

S CAMMINGA
Communications Officer
05 April 2026