



82nd ANNUAL GENERAL MEETING

28 October 2024

NOTICE and AGENDA – circulated 9 October 2024

Members are welcomed to this 82nd edition of the MRA's virtual AGM.

The content hereof shall remain open for discussion for a period of 24 hours from the time it is delivered to your email address, for members to “speak from the floor”, directing comments to the secretariat at info@mra.co.za

1. Confirmation of the Minutes of the 81st AGM

As circulated, the prior AGM minutes are available for review online ([81st Draft Minutes](#))

Proposed by Monique De Jager and seconded by Quintin Starkey.

2. Matters arising from the Minutes of the 81st AGM

Members are invited to raise any matters arising from the 81st AGM minutes, via the secretariat info@mra.co.za within 24 hours, failing which it shall be read that there were none.

3. To receive the Chairperson's & Vice Chairperson's Report:

1. Awareness Workshop - 28 February 2024

Infrastructure theft in South Africa continues to be a significant challenge, affecting industries ranging from telecommunications and energy to public services and manufacturing. In light of the increasing prevalence of this crime, the **Combined Private Investigations (CPI)** and **Metal Recycling Association (MRA)** took proactive steps by organizing a **Training and Information Workshop** held **28 February 2024**.

This workshop focused on the following key areas:

- **Current trends in infrastructure theft:** Analysis of how this crime has evolved in recent years, including statistics on affected industries and regions.

- **Techniques used in infrastructure theft:** A detailed review of the tactics criminals are employing to dismantle and sell critical infrastructure, such as copper cables, transformers, and other high-value metal components.
- **Countermeasures:** Presentations on technological, physical, and regulatory solutions to combat these crimes. This will include insights from security experts, law enforcement representatives, and industry leaders.
- **Collaboration between public and private sectors:** Discussions on how private industries, government agencies, and law enforcement can better work together to curb this crime.

Infrastructure theft not only causes direct financial loss to affected businesses but also has broader economic consequences, including job losses, production downtime, and public safety risks.

We are confident that the insights shared during this workshop will be invaluable in the fight against infrastructure theft, which continues to present significant risks to the sustainability and security of various industries across South Africa. Awareness also highlights the significant role the recycling industry plays in the fight against crime.

2. Second-Hand Goods Act (SHGA) Update - Comments and Amendments

On **11 August 2024**, the **Civilian Secretariat for Police Service** released proposed amendments to the **Second-Hand Goods Regulations**, which govern dealers and recyclers under the **Second-Hand Goods Act (Act No. 6 of 2009)**.

This Act plays a critical role in regulating the trade of second-hand goods and recycled materials, particularly in preventing the illegal sale of stolen goods, which often includes metals and other valuable materials sourced through infrastructure theft.

The key objectives of the proposed amendments are:

- **Enhancing record-keeping requirements:** Dealers will be required to maintain more comprehensive records of their transactions, including details of the seller, goods sold, and documentation to prove ownership.
- **Stricter controls on buyers and sellers:** Greater scrutiny will be placed on the legitimacy of sellers and buyers of second-hand goods, with a view to reduce the flow of stolen property into the market.
- **Improved oversight by authorities:** The amendments will provide clearer guidelines on the responsibilities of law enforcement in overseeing compliance with the regulations.

The MRA submitted comments to the proposed amendments, highlighting amongst others, the lack of consultation in the drafting of the proposed amendments. The MRA was a vital role player in the drafting of the current Act, which has served the industry well for more than a decade.

We are also awaiting the **finalization of exemptions** under the **Second-Hand Goods Act**, which will provide specific provisions for certain sectors and clarify operational boundaries for recyclers and dealers in the market. Once signed, these exemptions will further enhance regulatory oversight and compliance.

3. Free Trade and the Price Preference System (PPS)

The **Price Preference System (PPS)**, now in its **11th year**, continues to be a cornerstone of the regulatory framework governing the trade of scrap metal in South Africa. This system was introduced to prioritize local buyers over international markets, ensuring that local industries that depend on recycled metals are not deprived of critical raw materials.

By governments own admission in gazette notice 44037 – 24 December 2020:

“The Amended Export Control Guidelines on the Exportation of Ferrous and Non-ferrous Waste and Scrap as contained in Government Gazette Number 43765, Notice 532 of 2020 dated 2 October 2020 are herewith extended and will remain in force, in accordance with the Minister's Policy Directive, until 31 July 2021 or the date on which the export duty/tax on the exportation of scrap metal is fully implemented at a rate that is higher than 0 % (zero percent), as approved by Parliament, whichever date comes first.”

The PPS had not achieved the desired effect and was to be replaced by an export duty. As we know, we now have both policies running concurrently, which has given rise to the abuse of the system by a number of role players, due to the ambiguity of the system and lack of clear definitions.

PPS Guidelines under review: As of 2024, a formal review of the PPS guidelines is underway. The purpose of the review is *per* No. 51283 GOVERNMENT GAZETTE, 27 SEPTEMBER 2024

“The International Trade Administration Commission of South Africa (ITAC or the Commission) is embarking on a review of the Amended Export Control Guidelines on the Exportation of Ferrous and Non-Ferrous Waste and Scrap (the Guidelines) issued in connection with the Price Preference System for waste and scrap metals (PPS).

The purpose of this review is to determine how the overall effectiveness and efficiency of the PPS might be improved. In connection with its review, ITAC is seeking public comment, in particular on the issues identified in the Discussion section below. (refer to gazette notice for further information).”

We encourage all members and stakeholders in the recycling industries to comment on this review, as any changes will likely impact operations, especially regarding export procedures and local market supply.

Conclusion

2024 has been an extremely difficult year. With several initiatives and legislative developments, enhance regulation of second-hand goods, and ensure the sustainability of the metal recycling industry.

However, much work remains to be done, and the success of these efforts hinges on active participation and collaboration across all sectors. We strongly encourage all members to:

- **Support any future workshops on infrastructure theft** to contribute to the solutions being discussed.
- Stay up to date with **changes to the Price Preference System and Second Hand Goods Act**, especially in light of the ongoing review process.

Thank you for your continued commitment to safeguarding the integrity of our industry through your membership of the MRA, a SAPS accredited association.

We look forward to working together in 2025 and beyond.

Chairman

Quintin Starkey

Vice Chairman

Andrew Kilmartin

Proposed by Andrew Kilmartin, seconded by Monique de Jager.

4. To receive the Treasurer's Report:

**TREASURERS REPORT
2024**

1. BANK

Bank Balances, as at 15 October 2024

FNB – Daily Running Account: **R 13 577.87**

FNB – Money on Call Account: **R708 819.08**

Total: **R722 396.95**

2. MEMBERSHIP UPDATE

Subscription Invoices issued in the 2024 Cycle: 75

We welcome our new member, which has joined the MRA, since our last AGM:

- **LS Metals**

The following members either resigned or their membership was terminated:

- **Andilizer Trading**
- **Fishoff 1220 CC**
- **One Steel Recycling**

We currently have **1** member who has received a pre-termination notice, due to unpaid membership fees.

3. MEMBERSHIP FEES

Our membership fees for the 2024 Financial Year, as per the decision reached at the previous AGM was invoiced at R6 000 excl vat per member.

4. INSPECTIONS

The MRA currently has 124 registered branches; with the following Inspections figures:

- Completed Inspections – 72
- Incomplete Inspections – 7
- Re-opened due to incorrect information – 2
- New Membership Inspection – 1
- Inspections overdue (from previous years) – 24
- Inspections which have not reached due date – 18

We remind you that completing the Inspections process is an obligation that must be fulfilled as an MRA member. As a SAPS accredited association, we are required to report any non-compliant members to the SAPS, and therefore urge any overdue inspections to be completed in order to avoid this.

5. ANNUAL FINANCIAL STATEMENTS – 31 MARCH 2024

Revenue Generated for the last two financial periods:

Year	Membership Fees	Yard Inspections	Other (Special Levy)	Total
2024	R914 266	R41 000	R500	R955 766
2023	R916 143	R30 750	R291 000	R1 237 893

The above figure for 2024 excludes interest generated of R11 574.

Operating Expenses:

2024	R669 516
2023	R1 563 642

The decrease in expenses, has been due to various factors that the Exco took into consideration, where the current financial position of the MRA resulted in all expenses being reviewed and reduced substantially where possible. The MRA currently no longer makes use of any additional Consultants, and our legal expenses have been reduced, we have also aimed at moving as many meetings to online/ email as possible.

The MRA has made provision that the next financial period will follow a similar expense pattern; which allows us to aim towards having one-year annual expenses provisioned, as per our constitution by the end of the next Financial Year, should we receive no further claims against the MRA.

6. PROPOSALS

In order for the MRA to fulfil its obligations towards having one year's annual expenses, a proposal of a 10% increase on membership fees is suggested. Therefore, fees being R6 600 excl VAT for the oncoming year.



Monique de Jager

Treasurer

21 October 2024

Proposed by Quintin Starkey, seconded by Mike Wilson.

5. To receive the audited Financial Statements for 31 March 2024

The Financial Statements are available on our website ([Annual Financial Statements 2024 fv.pdf](#)) Any comments can be emailed to the Secretariat.

Proposed by Monique de Jager, seconded by Andrew Kilmartin.

6. To appoint Auditors for the ensuing year

The reappointment of auditors Bernard Levine, Bismilla & Associates for the 2024/2025 year of accounting is proposed by Monique de Jager and seconded by Quintin Starkey.

7. To appoint an Association Secretary for the ensuing year

The continued appointment of Mrs Rachelle Bezuidenhout as Association secretary is proposed by Monique de Jager and seconded by Lisa Steenkamp.

8. To elect the Executive Committee

The following nominations for the new executive committee were received:

Quintin Starkey	Star Recycling	
Andrew Kilmartin	Speciality Metals	
Monique de Jager	Gauteng Metal Recyclers	
Dominic Maguire	Cronimet (RSA) (Pty) Ltd	
Rafael Barnett	SA Metals	
Lisa Steenkamp	Honeydew Metal Recycling	
Stephan Mynhardt	MRS Scrap Holdings	
Stephan Pretorius	Envirocycle	
Quintin Mohr	BG Scrap	
Bernard Maguire	Cronimet (RSA)	Not Available
Mike Wilson	CSC Metals	Not Available
Dermont White	Alicop Trading	Not available
Christo Louw	BG Scrap	Not available
Mohammed Mehtar	Spot Cash	Not available
Mayank Sirohi	Afro India	Not Available
Daniel Barnett	SA Metals	Not Available

Paragraph 10.3.4.2. of the constitution requires members to elect no less than 7, and no more than 9 executive committee members, from the list of available nominees (above).

An electronic voting roll will be circulated separately to all members via email, after the expiry of the 24-hour comments period to this session. The results thereof will be verified by the association's auditors and circulated to members in due course.

9. General

9.1 Annual subscription:

2025 Fees will be increased to R 6 600 excluding VAT in April 2025.

10. This meeting shall be declared closed 24 hours after email delivery, alternatively upon the conclusion of any discussion arising from the floor.