

# VININTELL

March 2013, Issue 15



## Future scenarios for the South African wine industry

Part 4: Ethics and compliance





Welcome to this edition of VinIntell as a value-added service to members of the S A Wine Industry. The purpose is to provide you, the decision-maker, with meaningful insight into events, trends, opportunities and threats through the analysis of the ever-changing competitive environment. The analytical approach is a multifaceted, multidisciplinary combination of scientific and non-scientific processes.

We trust that this publication will become part of your strategic thinking, strategic planning and decision-making process. You are welcome to send comments and suggestions to the publisher.

## Contents

INTRODUCTION.....	3
BACKGROUND.....	3
FRAMING BUSINESS ETHICS .....	4
SOUTH AFRICAN ETHICS IN AGRICULTURE LANDSCAPE .....	5
CHALLENGES AND REMEDIES TO MANAGING ETHICS.....	7
Ethical codes and compliance .....	7
Leading by example.....	8
Focus points.....	9
CONCLUSION.....	10

## INTRODUCTION

This edition is the fourth delivery in the PESTEL (Political, Economic, Social, Technology, Environment and Legal) series on the South African wine industry. Part 1 (May 2012) was about the impact of climate change; Part 2 (August 2012) concerned the impact of regulatory change; and Part 3 (November 2012) concerned non-tariff barriers as economic factor. The PESTEL series aims to unpack prominent macro factors<sup>1</sup> that impact on each category and at the end of the PESTEL series, a consolidated future picture featuring a high road (*Cup Runneth Over*) and a low road scenario (*Scraping the Barrel*) will be compiled.

The global wine industry, like all industries, is in a perpetual state of change and adaptation. There are many factors in the macro environment, such as trade barriers, demographic change, climate change and government policy changes that interact with one another to create complex and interesting plots and that lie at the basis of change in the wine industry and impact on the decisions of the managers of any organisation or company. This edition will focus on the social factor of ethics specifically in the South African wine industry context. At present, ethics is a highly topical issue in the South African and global wine industry. Sentiment against alcohol is increasingly negative. It is regarded as contributing to social ills and globally anti-alcohol regulation is being tightened. Gauteng published proposed draft liquor regulations that propose a total ban on alcohol sales on Sundays. If successful, this will mean that no outlet may sell alcohol for consumption on or off their premises on a Sunday. In Russia, a far-reaching ban on alcohol advertising has gone into effect recently as part of a campaign to address Russia's alcohol problem. In South Africa, similar legislation is on its way. Against this background, it is increasingly necessary to conduct ethically and socially responsible business.

## BACKGROUND

Ethics in businesses and industries like the wine industry has risen in prominence as a topic at a time of protracted global economic downturn and the resultant pressure on the profits, regardless of the industry. Important lessons can be learnt from cases of businesses that have been morally and ethically irresponsible. Such practices can have dire consequences for products and reputations also in a wine industry context. Ethics aspects such as environmentally friendly practices, labour-issues, health and consumption and transparency e.g. in labelling, will grow in prominence in future. Of relevance is a recent article in Decanter<sup>1</sup> on ethical wines' ("*organic, sustainable or Fairtrade*") perception in China, a prominent wine market. The overwhelming majority of Chinese wine consumers surveyed by Decanter said they prefer ethical

<sup>1</sup> Macro factors can be categorised using the PESTEL model. This classification distinguishes between political factors (that refer to government policy such as the degree of intervention in the economy); economic factors (interest rates, economic growth, and exchange rates); social factors (ethical business, transparency, changes in social trends can impact on the demand for a particular product); technological factors (social media, production methods and innovation that can lead to reduced costs and improved quality); environmental factors (the weather and climate change); and legal factors (legal and regulatory issues).



wines, far more than the UK, the US and Germany. This could have significant implications for wine exporters targeting the Chinese market.

Ethics seem to come under pressure when profits come under pressure. Enterprises are often tempted to drive ethics to the back-burner when the going gets tough. The chairman of PricewaterhouseCoopers (PwC), Dennis M. Nally wrote in the introduction of the PwC 16th Annual Global CEO Survey (released in January 2013) that *“risks that once seemed improbable and even remote have become the norm.”* The saying that the only constant is change has become the norm. The challenging economic situation does not bode well for ethics. In a similar vein, a survey by Ernst & Young in 2012<sup>2</sup> indicated that more and more CEOs are willing to embark on or allow unethical business practices in order to help the company survive in challenging economic circumstance. Such practices would include entertainment and gifts to win business. Bribery and corruption therefore remain pervasive and are bound to remain areas of concern.<sup>3</sup>

Some high-profile ethics-related cases that are still fresh in the memory include Lance Armstrong admitting that he used performance enhancing drugs during his seven wins at the Tour De France<sup>4</sup> and BP which had to pay billions of Rand in penalties and damage after the oil disaster in the Gulf of Mexico.<sup>5</sup> More recent has been the meat mislabelling scandal hitting the news headlines in the UK and now also in South Africa.

In one of the most recent cases and one particularly relevant is the case of Anheuser-Busch InBev (AB InBev), the world’s biggest brewer, being sued by consumers in three US states for allegedly overstating the alcohol content in its Budweiser beer. AB InBev is said to be unjustly enriched by the additional volume it can sell. It is alleged that AB InBev routinely adds extra water to its finished products to produce malt beverages with significantly less alcohol content

than displayed on its labels, violating state statutes on consumer protection.<sup>6</sup> Adding to its reputational woes, the lawsuits are also

**Brewed awakening: Budweiser accused of watering down several of its most popular beers to turn greater profits.**

seeking a court order requiring Anheuser-Busch to fund a *“corrective advertising campaign”* to remedy its allegedly illegal conduct. Anheuser-Busch denies the claims but there is no denying the reputational damage it is suffering.

## FRAMING BUSINESS ETHICS

Businesses face ethical issues and decisions almost daily regardless of the industry. In the food and beverage industry, ethics issues are highly significant. The Business Directory defines ethics as follows: *“Ethics is the basic concepts and fundamental principles of right human conduct. It includes study of universal values such as the essential equality of all men and women,*

*human or natural rights, obedience to the law of land, concern for health and safety and, increasingly, also for the natural environment.”* In simplest terms, ethics in business refers to differentiating between right and wrong and the resiliency of a business such as a winery and its stakeholders, to choose to do what is right in terms of actions and decisions.<sup>8</sup> Issues related to reputation, managing the green environment (and sustainable practices), remuneration and labour practices and the quality and integrity of its production processes and products are all related to ethics.<sup>9</sup> Business ethics also closely relates to Corporate Social Responsibility (CSR). Typically the two terms are mutually inclusive: An ethical business should be a socially responsible business while a socially responsible business should be an ethical business.<sup>10</sup>

A distinction needs to be made between what is ethical and what is legal. Whereas ethics is about what is right or wrong, law is about what is lawful or unlawful. Laws change over time but ethical standards are constant. Sometimes companies go beyond what is legally required in order to restore confidence and reputation. In 1982, Johnson & Johnson immediately withdrew more than 30 million bottles of Tylenol from shelves when seven people died of cyanide poisoning after unwittingly consuming sabotaged Tylenol capsules. Johnson & Johnson took remedial action that was not required by law, but by doing so, the company earned the respect of consumers and the media alike, and this case is now widely taught in business schools as an example of how to manage a crisis effectively, restore trust and reputation and continue to prosper.<sup>11</sup>

*“Ethics is not an optional add-on to ‘normal’ business, nor is it a ‘soft’ issue. All business strategies and operations have an ethical dimension that we cannot escape – as we cannot escape our own shadow. Ethics holds enormous risks for companies, but more importantly creates reputational and competitive opportunities”*

– Willem Landman, EthicsSA, September 2009

## SOUTH AFRICAN ETHICS IN AGRICULTURE LANDSCAPE

The South African wine industry is growing its international market share in an increasingly competitive global environment. Having a unique selling proposition that provides a competitive advantage will ensure that South African wines are effective competitors in the global market.

The South African wine industry is providing unequalled global leadership in terms of adopting ethical parameters on labour practices and developmental issues in particular. The Wine and Agricultural Industry Ethical Trade Association (WIETA) was founded in November 2002 as a not-for-profit association that actively promotes ethical trade in the wine industry value chain. Whereas its focus was initially on issues of ethical trade among stakeholders such as produ-





cers, retailers, trade unions, NGOs, government and the private sector, associated with the wine industry of the Western Cape, it later extended its work down the wine supply chain and into the wider agricultural sector.<sup>12</sup>

With the 2012 / 2013 labour unrest still fresh in the mind, it is also worthy to note that WIETA also has a fair labour initiative in place to fast-track the implementation of fair labour practices on wine farms and in wine cellars. This fair labour initiative, checked by WIETA, is supported by foreign retailers, labour unions and several industry and civic society bodies and has led to the creation of an ethical seal, the Certified Fair Labour Practice seal that since 2012, testifies to “reasonable working conditions”<sup>13</sup>. The Certified Fair Labour Practice seal is a world-first amongst wine-producing countries. Only those producers that meet the criteria set by WIETA are entitled to use the seal on their wines. The WIETA code of good labour practice is premised on the base code of the International Labour Conventions (IOL)’s Ethical Trading Initiative and also incorporates South African labour legislation and prohibits the use of child labour, asserts that employment should be freely chosen and that all employees should have the right to a healthy and safe working environment and a living wage. The seal also ensures traceability of the history of a wine product, similar to the Fairtrade accreditation, a factor that has many advantages in the competitive global marketplace. Wines of South Africa (WOSA) hopes that all South African producers will be accredited with the new seal by 2015.<sup>14</sup>



Besides WIETA’s Certified Fair Labour Practice seal there is also Fairtrade and the Sustainability Seal. South Africa is the largest producer of Fairtrade wine in the world according to Fairtrade Label<sup>15</sup>. Fairtrade is the global certification system for sustainability and poverty alleviation.<sup>16</sup> A product that carries the Fairtrade Label declares that both producers and traders have met Fairtrade Standards and that they are audited annually to ensure compliance. Wine contributes significantly to the growth of Fairtrade in South Africa: about 20% of the estimated R73,5

million spent on Fairtrade products in South Africa in 2011 was generated by South African Fairtrade wines. A percentage of the sales of each bottle of South African wine goes back to the labourers on the estate. This is called the Fairtrade Development Premium<sup>17</sup> which farm labourers can invest in projects they deem necessary for their communities, such as education and training programmes for the workers and their families and the improvement of services and infrastructures. Fairtrade certification also ensures that the wine is produced sustainably in accordance with Fairtrade Standards and that full traceability is in place.<sup>18</sup>

The Sustainability Seal was introduced in 2010 and can only be used by producers who are certified as sustainable by Sustainable Wine South Africa (SWSA<sup>19</sup>). SWSA is an alliance



between the Wine and Spirit Board (WSB), the Integrated Production of Wine (IPW) scheme, the Biodiversity and Wine Initiative (BWI) and WOSA, who through the Sustainability Seal, are driving the South African wine industry’s commitment to sustainable, eco-friendly production. Again, this is a unique initiative that has enhanced the image of South African wines on the global market.

Finally, there is the Industry Association for Responsible Alcohol Use (ARA) which is focused on the prevention of the negative consequences of alcohol abuse and ensures that commercial communication activities (marketing and sales) are responsible and appropriate.<sup>20</sup>

## ETHICS AND WINE ELSEWHERE

In other wine producing countries, ethical codes are present but they somewhat differ from those in South Africa. The Australian Wine Industry Code of Conduct (WICC), launched in December 2008 and revised in 2011<sup>21</sup> does not include referrals specifically to labour while the environment and traceability are viewed as issues of lesser importance. A study in 2012 into various issues relating to Australian wine’s image in its key markets showed that across all markets quality control has some importance, but environment and traceability were found to be largely unimportant to consumers.<sup>22</sup> It is interesting to note that labour practices therefore do not feature in the debate on quality and image of Australian wine, the focus is largely on the environment (sustainable practices) and quality of the product.<sup>23</sup> The WICC was developed by Wine Grape Growers Australia (WGGGA) and the Winemakers’ Federation of Australia (WFA) in the interests of a sustainable Australian wine industry. The WICC has a dual purpose namely to establish a common Australian wine grape supply contract framework and to provide a dispute resolution system to manage disagreements which exist over price or quality assessments.<sup>24</sup> The WICC is voluntary<sup>25</sup> but there is encouragement that wineries sign the Code. The WGGGA aimed to sign up 50% of the top 100 Australian wine producers by tonnes processed by 31 December 2013.<sup>26</sup> The Committee has the ability to expel non-complying signatories and also publish their names in its Annual Report and on its website.

## CHALLENGES AND REMEDIES TO MANAGING ETHICS

It is not easy to manage ethics but it must be done and it can hold substantial advantages if it is handled correctly and effectively. Several reasons make the management of ethics a challenge of which the two foremost reasons are the lack of an ethical code, the challenge of leading by example and incorporating the interests of society.<sup>27 28</sup>

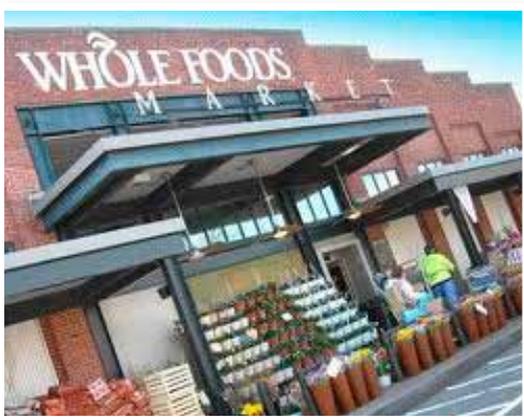
## ETHICAL CODES AND COMPLIANCE

Implementing a code of ethics is an increasingly necessary instrument to ensure that wine producers and employees act ethically. Such codes typically cover aspects such as corporate social responsibility, dealings with customers and supply chain, environmental policy and



actions and rules for personal and corporate integrity.<sup>29</sup> Creating an ethical culture is a continuous process that starts with cultivating an ethical culture followed by the design of ethical standards in the form of codes and policies. These should be integrated into the business and then monitored over time to ensure that ethics and the code become engrained and are sustained, managed and measured.<sup>30</sup>

In order for an ethical code to become engrained, it needs to be effectively communicated and training and sensitisation needs to take place. All employees need to understand what the business' ethical parameters are regardless of their own ethical values. The accountability for this lies with wine producer / business leader.



### LEADING BY EXAMPLE

Against the background of the challenges facing wine producers to sustain ethical values and standards, one focus could be displaying ethical leadership. Such leadership would adhere to and honour a universally acceptable set of ethical principles that would not need “spin doctoring” according to the EthicsSA CEO, Dr Deon Rossouw. Failure to lead by example will mean that only lip service is paid to maintaining ethical standards and that ethics is not taken seriously. Globally, industry leaders are increasingly recognising that profit need not be their only priority, that ethical leadership starts at the top and that executive remuneration in difficult economic times should not be excessive in relation to the rest of the employees. In this regard, the CEO of listed food company Whole Food Markets in the US, John Mackey has pegged remuneration of the executive management i.e. the leaders may not earn more than 19 times than the average hourly rate and has foregone any bonuses since 2008. Mackey said employees and not shareholders should be the first priority in a company as this would lead to better production, satisfied markets and in turn satisfied shareholders.

Leadership also extends to the society. The labour unrest in the Western Cape and in the North-West Province (Marikana) emphasised the reality that business' actions have a longer term impact on society. Indeed, South Africa's National Development Plan emphasises “the need for a social compact that builds society as a whole.”<sup>31</sup> “Building an ethical, just society is not something that leaders can do alone. As the notion of the social compact demonstrates, we all have to take individual responsibility for the society in which we live,” says Dr. Rossouw. Policies, codes, laws and regulations are only parts of the solution; it is up to individuals to also take part on building an ethical and just society.<sup>32</sup> A recent case in point of engaged citizenry is the decision by Consulting Engineers South Africa (Cesa, a body that represents 90% of consulting engineers in South Africa) to become more aggressive in challenging procedural deviations from procurement processes and alleged corruption by challenging irregular tender awards on behalf of its members.<sup>33</sup>



### FOCUS POINTS

Related to leadership by example, wine producers in South Africa are faced with and should manage a number of aspects. These aspects can be briefly listed as follows:

- Labour practices including remuneration, housing and health and safety and social upliftment;
- Environmentally friendly production processes (on the estate, in the cellar and during the bottling process);



- Product and production integrity and traceability: Ensuring that the bottle contents can be traced back to source at every stage of the supply chain to confirm the integrity of the production source of the grapes, their varietal and vintage;
- Packaging and labelling: Being mindful of the environment in the packaging and transport of the product and ensuring that the product is not mislabelled; and
- Responsible and appropriate marketing strategies including responsible content and responsible placement in the various advertising media and social media platforms.

These aspects are all covered by Fairtrade, WIETA's Certified Fair Labour Practice seal and Sustainable Wine South Africa's Sustainability Seal. In addition, members of the Industry Association for Responsible Alcohol Use (ARA) ascribe to the Code of Advertising Practice of the Advertising Standards Authority of South Africa (ASA) ensuring their commitment to responsible, legal, truthful, honest and legal commercial communication activities.

## CONCLUSION

In today's highly competitive wine market space, the issue of unique selling points or distinguishing factors to set one apart from the competition is an imperative. Being an ethical business or industry that delivers an ethical product can be viewed as such a unique selling proposition. It is also clear that ethics is a complex matter that requires not only a top-down approach such as leading by example, policies, rules, codes and laws, but is also required input from the bottom-up e.g. from consumers. In South Africa, the government and self-regulatory environment is sound as far as ethics is concerned. In addition, it seems that consumers (the social conscience) are increasingly holding unethical businesses to account and that social media is an effective instrument in endeavours to highlight errant practices. A particular example of the growing power of the public via social media is the Woolworths versus Frankie soft drink case of 2011<sup>34</sup> that damaged Woolworths' reputation and that led to the withdrawal from its shelves of its Frankie-like product.<sup>35</sup> From the wine producer's viewpoint, building an ethical business and putting an ethical product on the market will become a necessity and not an option and can provide much-needed competitive advantage in the global marketplace.

## ENDNOTES

- 1 <http://chinawinesolutions.com/low-alcohol-wines-in-china/>
- 2 12th Global Fraud Survey Growing Beyond: a place for integrity. [www.ey.com/GL/en/Services/Assurance/Fraud-Investigation---Dispute-Services/Global-Fraud-Survey---a-place-for-integrity](http://www.ey.com/GL/en/Services/Assurance/Fraud-Investigation---Dispute-Services/Global-Fraud-Survey---a-place-for-integrity)
- 3 Ernst & Young 12th Global Fraud Survey Growing Beyond: a place for integrity
- 4 [www.corporatecomplianceinsights.com/the-lance-armstrong-confession-lessons-in-ethics-and-compliance?goback=%2Egde\\_4460861\\_member\\_207244109](http://www.corporatecomplianceinsights.com/the-lance-armstrong-confession-lessons-in-ethics-and-compliance?goback=%2Egde_4460861_member_207244109)
- 5 BP's \$4 Billion in Fines and Penalties Should Be Red Flag to Oil Industry. November 2012. [www.revenuewatch.org/news/blog/4-billion-bp-fines-penalties-should-be-red-flag-oil-industry](http://www.revenuewatch.org/news/blog/4-billion-bp-fines-penalties-should-be-red-flag-oil-industry) and BP Slapped with Record Fine. November 2012, *The Wall Street Journal* <http://online.wsj.com/article/SB10001424127887324556304578120140555122104.html>
- 6 *The case is Greenberg v. Anheuser-Busch Cos LLC*, 13- cv-01016, U.S. District Court, Eastern District of Pennsylvania (Philadelphia). [www.bloomberg.com/news/2013-02-26/ab-inbev-overstates-alcohol-in-budweiser-lawsuit-claims.html](http://www.bloomberg.com/news/2013-02-26/ab-inbev-overstates-alcohol-in-budweiser-lawsuit-claims.html)
- 7 [www.businessdictionary.com/definition/ethics.html#ixzz2lp9zavtL](http://www.businessdictionary.com/definition/ethics.html#ixzz2lp9zavtL)
- 8 James Fieser, *Business Ethics*, 1996
- 9 James Fieser, *Business Ethics*, 1996
- 10 [www.ranker.com/list/top-100-socially-responsible-companies/business-and-company-info](http://www.ranker.com/list/top-100-socially-responsible-companies/business-and-company-info)
- 11 [www.mallenbaker.net/csr/crisis02.php](http://www.mallenbaker.net/csr/crisis02.php)
- 12 [www.wieta.org.za/wieta\\_more.php](http://www.wieta.org.za/wieta_more.php)
- 13 The WIETA code is "premised on the base code of the International Labour Conventions' Ethical Trading Initiative and also incorporates South African labour legislation. It precludes the use of child labour, asserts that employment should be freely chosen and that all employees should have the right to a healthy and safe working environment. Amongst the conditions it sets are that workers should have the right to freedom of association, a living wage and to be protected from unfair discrimination. Worker housing and tenure security rights should also be respected. The ethical seal is granted to individual wines, as opposed to the wineries themselves." [www.capewineacademy.co.za/first-SA-wines-to-carry-ethical-seal-announced.htm](http://www.capewineacademy.co.za/first-SA-wines-to-carry-ethical-seal-announced.htm) and the WIETA website.
- 14 [www.thewinedetective.co.uk/blog/south-africa/first-wines-awarded-new-ethical-seal/](http://www.thewinedetective.co.uk/blog/south-africa/first-wines-awarded-new-ethical-seal/)
- 15 [www.fairtradelabel.org.za/product/wine.1.html](http://www.fairtradelabel.org.za/product/wine.1.html)
- 16 [www.fairtradelabel.org.za/whatis/what-is-fairtrade.1.html](http://www.fairtradelabel.org.za/whatis/what-is-fairtrade.1.html)
- 17 [www.fairtradelabel.org.za/whatis/fairtrade-international.2.html](http://www.fairtradelabel.org.za/whatis/fairtrade-international.2.html)
- 18 [www.fairtradelabel.org.za/whatis/what-is-fairtrade.1.html](http://www.fairtradelabel.org.za/whatis/what-is-fairtrade.1.html)
- 19 [www.swsa.co.za/](http://www.swsa.co.za/)
- 20 [www.ara.co.za/about](http://www.ara.co.za/about)
- 21 Australian Wine Industry Code revised, January 2012, Australian & New Zealand Grapegrower & Winemaker, Jan 2012, Issue 576, p3
- 22 [www.gwrdc.com.au/wp-content/uploads/2012/12/USA-0901.pdf](http://www.gwrdc.com.au/wp-content/uploads/2012/12/USA-0901.pdf)
- 23 [www.wineindustrycode.org/AWICOC.pdf](http://www.wineindustrycode.org/AWICOC.pdf)
- 24 For an introduction and overview of the Code, download the Australian Wine Industry Code of Conduct brochure and download a one-page, at-a-glance summary of the Code Dispute Resolution Process
- 25 [www.wgga.com.au/wp-content/uploads/WGGA-CodeConduct-Brochure.pdf](http://www.wgga.com.au/wp-content/uploads/WGGA-CodeConduct-Brochure.pdf)
- 26 [www.wineindustrycode.org/](http://www.wineindustrycode.org/)
- 27 [www.ethicsa.org/](http://www.ethicsa.org/)
- 28 [www.ethicsa.org/index.php?page=Press%20Releases\\_Ethics%20Priorities](http://www.ethicsa.org/index.php?page=Press%20Releases_Ethics%20Priorities)
- 29 [www.tutor2u.net/business/strategy/business-ethics-introduction.html](http://www.tutor2u.net/business/strategy/business-ethics-introduction.html)
- 30 [www.icsa.co.za/documents/speakerPres/.../WillemLandman.ppt](http://www.icsa.co.za/documents/speakerPres/.../WillemLandman.ppt)
- 31 National Development Plan Vision 2030. [www.npconline.co.za/medialib/downloads/home/NPC%20National%20Development%20Plan%20Vision%202030%20-lo-res.pdf](http://www.npconline.co.za/medialib/downloads/home/NPC%20National%20Development%20Plan%20Vision%202030%20-lo-res.pdf)
- 32 Professor Deon Rossouw was director of the Centre for Business and Professional Ethics at the University of Pretoria before taking up his current position as CEO of the Ethics Institute of South Africa. He is the author of several books and articles, primarily in the field of business ethics and corporate governance. [www.ethicsa.org/index.php?page=Press\\_Corruption](http://www.ethicsa.org/index.php?page=Press_Corruption)
- 33 [www.concrete.tv/2013/02/cesa-speaks-out-on-the-government-tendering-processes/](http://www.concrete.tv/2013/02/cesa-speaks-out-on-the-government-tendering-processes/)
- 34 Frankie's Olde Soft Drink Company, a small KwaZulu-Natal-based business, had the idea of reproducing favourite soft-drink flavours from the past. It invited Woolworths to stock its product but was told it was not in line with the upmarket retailer's character and was turned away. Next thing Woolworths had an almost identical product on its shelves. Frankie's accused the retailer of theft and got a huge sympathy vote on social media. The Advertising Standards Authority (ASA) ruled that it had "deliberately and intentionally copied" the Frankie's product and ordered it to change its labelling.
- 35 [www.smesouthafrica.co.za](http://www.smesouthafrica.co.za)

*Enquiries & contributions to  
Dr Marie-Luce Kuhn, IBIS Business and Information  
Services (Pty) Ltd, PO Box 7048, Stellenbosch 7599  
tel +27 21 8832855  
e-mail [mlm@ibis.co.za](mailto:mlm@ibis.co.za) website [www.ibis.co.za](http://www.ibis.co.za)*

A SAWIS Publication.  
©SAWIS, 2010

**ibis**<sup>TM</sup>

strategic environmental analysis

