The 1973 Durban Strikes: of Local and National Significance

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The 1973 Durban strike wave is historically significant, not only in that it represented the start of a new era of conflict in South African politics, but also in the links between the strike wave and the emergence of the independent trade union movement. It is only through understanding the historical and regional context in which the unions arose that one can fully understand their contemporary position and role.

By 1971, there were already signs of increased restlessness amongst blacks in the Durban region. In a survey conducted by Schlemmer[1] during this year 70% of black workers interviewed were dissatisfied with the wages they received. The inflation rate had increased, with the CPI now reaching 6.9%.[2] Repeated price rises were to be one of the major causes of the 1973 Durban strike wave. A high degree of relative deprivation was indicated by the fact that seven out ten of those who indicated that low wages were a major problem, blamed it on factors such as discrimination and "ill will".[3] Thus a sizeable percentage of the black workforce ascribed their problems ultimately to arbitrary social injustice. This was to have direct effects on the subsequent nature of collective action. Interestingly, although very few black workers were unionized during this period, 45% of workers surveyed believed they had considerable bargaining strength at their disposal.[4]

Intellectuals as Union Founders

In 1971 a mass breakaway of NUSAS's black members took place, to align themselves with the Black Consciousness movement. This forced a major rethink in NUSAS as to its role, relevance and ultimate direction. As Friedman[5] notes, "the students had remained cloistered in their segregated campuses and made no contact with the rank and file blacks on whose behalf they presumed to speak." In a quest for greater relevance "Wages and Economic Commissions" were established on all NUSAS campuses. Originally these commissions were concerned with gathering data on wage levels. The first commission was established on the Durban campus of the University of Natal. Most of these commissions soon changed from their original data-gathering role, to a more direct one of assisting in the organization of black workers.[6]

The Durban "Benefit Fund"

Natal University political scientist Richard Turner approached Harriet Bolton, a veteran Durban-based TUCSA Union official and suggested she offer Natal Wages and Economic Commission students employment in registered Trade Unions.[7] With student help, Bolton established the "General Factory Workers' Benefit Fund" in Durban. As the name suggests, one of the primary functions of the Fund was to provide benefits for its members, in this case, funeral benefits. It was decided to avoid a more overtly trade union type role for fear of attracting an unfavourable reaction from the authorities. At this stage, it was still unclear what the state's response to independent trade unions for blacks would be, but the experience of SACTU in the 1960's had shown that it was unlikely to be favourable.[8] Despite this, the Fund attempted to represent some basic worker demands. Fisher[9] argues that the success of the Benefit Fund can be ascribed to the fact that many workers believed it was an effective vehicle for representing their interests. Natal University students (Durban) who became prominent in the organization of black trade unions included Haltyon Cheadle, David Hemson and David Davis. All were banned in the aftermath of the strike wave and were subjected to house arrest.[10] At the end of February 1973 Turner himself was subject to restriction orders.

Eleven strikes took place in the Durban/Pinetown region in 1971.[11] Although by contemporary standards this might seem relatively few, it was at the time proportionately-speaking significant (only 69 strikes had taken place country-wide).[12] The success of the "Benefit Fund", and the number of recorded instances of strike action that took place in this region, shows that in at least two respects the Durban area set a lead that most of the rest of the country was to follow. Increased numbers of strikes took place nationally in 1974, whilst the UCT-based Western Province Workers Advice Bureau experienced a rapid growth in its activities.[13] Although there were no definite links between the Benefit Fund and the 1973 strike wave, it seems that behind the scenes the fund gave considerable support to the strikers. As Friedman notes prior to the strike wave, the Fund had 2 000 members and in the aftermath it grew to 60 000.[14]

Bolton soon attracted the attention of the security police.[15] Eventually she was forced to resign from the Garment Workers' Union over the issue of her support for black unionism.[16] Garment Workers' Union officials had been unsympathetic towards the Durban Strikes. They distanced themselves from her stance, arguing that to attempt to organize black workers "was not worth the trouble", as one would "be in trouble like her".[17]

Collective Action by Stevedores

In September 1971 African stevedores threatened to resort to strike action.[18] A wage increase was granted, but the

Durban Stevedore's Labour Supply Company said that this was not as the result of the threatened action.[19] However, in November the African stevedores did resort to strike action. Workers refused to elect spokesmen for fear of victimisation, with an apparent incident between workers and police taking place.[20] Many workers returned after being threatened with dismissal.[21] Whilst workers returned to work the following day, it nonetheless is unusual for the time on account of its magnitude. In addition, it seems to have represented a further symptom of the unusually high degree of restlessness in the area, with 11 strikes in all taking place in 1972,[22] again a significant figure if the strike totals in the rest of the country are considered. Dekker *et al*[23] see the dispute as a sign of "smoldering worker discontent", that was also expressed in the 1969 dockers' strike and eventually led 1973's events. However, the Schlemmer survey indicated that workers already often ascribed their economic misfortunes to the excesses of the apartheid system.

The period of inaction in the late 1960's was ended with the establishment of the first workers' advice bureau, benefit society and training project. However, strikes still tended to be short spontaneous affairs with little evidence of formal workers organization present. By 1972 this situation had changed somewhat, with several major instances of strike action taking place. At least one of these disputes led to the formation of a union. Nonetheless, there was to be a considerable lapse of time before the fledgling unions became firmly established.

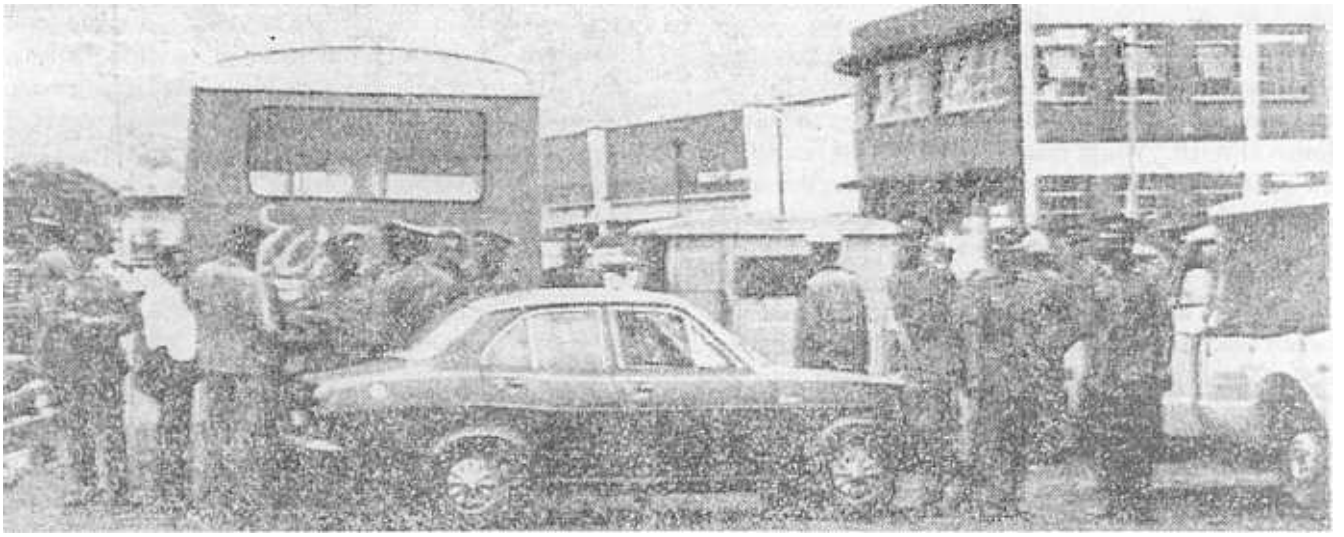
The Course of the 1973 Durban Strike Wave

To many, the 1973 Durban strike wave came rather as a bolt of lightning on a clear day, a totally unexpected development. The first strike was to occur at the Coronation Brick and Tile factory. This strike affected a relatively large work-force and was, to a degree, successful. From this start, the strikes spread rapidly throughout the Durban district. Most notably hit was the Frame group of companies, perceived by many workers to have poor labour relations.[24] In fact, the role of Mr. Philip Frame came under no little criticism from a range of quarters, most notably the English language press.[25] Frame argued that he was being unfairly singled out, saying that it was "unfair to blame one man for what are the faults of the industrial system".[26] Indeed his group's policies were not atypical of the region.[27] A Durban newspaper survey revealed that 90% of whites interviewed believed black wages were too low in the Durban area.[28]

Taken by surprise, many managers were quick to grant wage increases, resulting in the strikes being of comparatively short duration. The situation was further complicated by rumours of an impending transport boycott.[29] Police turned out in force on the morning the boycott was meant to take place, yet nothing occurred.[30] It can be argued that despite its failure to materialize, rumours of the boycott could have served to popularize the idea of striking. The entire strike wave came to a halt when the Durban Corporation threatened to dismiss all striking workers at its premises.

The state's reaction was surprisingly muted. Although riot police were flown in from Pretoria and a strong police presence was visible in the townships, almost no violence occurred.[31] Indeed, it seems that police hardly ever interfered in disputes.[32] The senior police officer in the region, Brigadier Bisscoff, argued that the "police have nothing against people asking for higher wages", although he reiterated that strikes by blacks were illegal.[33] The Brigadier gave his officers instructions to use only a minimum of force, and indeed police action was always restrained.[34] Significantly, only 3% of strikes ended in dismissals during the entire year.[35] Arguably, this was the result of the state and employers being confronted with a totally unexpected and almost unknown occurrence. This resulted in a greater willingness to compromise to some extent, the former in the 1973 proclamation (this permitted legal strikes by blacks, but only once a complex process had been exhausted), and the latter by granting limited wage increases. Of course, the general lack of readily identifiable leaders made it hard for state and management to take effective action. It would be far harder to fire an entire work-force than a few supposed "instigators". Likewise, as Dekker *et al*[36] note, it would be virtually impossible to detain an entire work-force. Significantly, the local security police chief claimed that he could find no evidence of an organization behind the strikes.[37] The government initially rejected the idea of extending union rights to blacks and instead attempted to revitalise the committee system by amending the 1953 act to introduce liaison committees and upgrade works committees.[38] However, black workers in the Durban region still seemed to favour proper trade unions and tended to only use works committees as a temporary expedient to gain a presence on the shop floor, enhance their position and to protect the rights of black workers.[39]

All in all, 61 000 workers were involved in the Durban strike wave.[40] Clearly a major cause of worker grievances was economic deprivation. Durban Point MP, Mr. Vause Raw, challenged the Minister of Labour to bring the alleged "criminal agitators" behind the strike "to court so that the world can see that criminal revolutionaries were responsible for the strikes, not R9 per week wages, R8 per week wages or lower wages in many cases".[41] The 1974 Institute for Industrial Education (IIE) report argues that the central grievance of workers was low wages.[42] The lack of any effective negotiating mechanisms and the unwillingness of employers even to consider the needs of workers exacerbated the problem.[43] The fact that wages in the Durban region were slightly lower than in other major centres, does not appear, on its own to provide a sufficient explanation why the strike took place in Durban.[44] Other factors could have been present in the Durban area. However, once the first strikes took place, the sight of workers striking and the "general atmosphere of crisis" seems to have encouraged further workers to strike[45] - a concertina effect not unlike the chain of events during the 1971-2 Namibian strikes. Fisher[46] argues that there was much dissatisfaction amongst workers with the excesses of the apartheid system of discrimination, which had placed them in a most unfavourable position. However, workers had yet to "develop a detailed understanding of the



Strike at frame Textiles. Heavy police presence at the main plant. (Eastern Province Herald)

relationship between the socio-political system and economic exploitation".[47] Despite this, there was a "dim awareness" of the link between the wider socio-political reality and work-place struggles.[48]

Indeed 81% of the strike-hit firms paid the minimal wages of less than R50 a month, compared with the general figure of 67% of all firms located in the Durban-Pinetown area.[49] In fact there had been a general decline or slowing of the rate of increase of real wages, owing to a rising inflation rate. In 1973 the rate of increase of Consumer Price Index had risen by some 2.7%, from just over 7.3% in 1972 to 10.0% in 1973.[50]

The 1973 Durban Strikes and a Broader Political Inequality

It is important to note that in the South African context, an issue such as wages cannot be viewed in complete isolation. Basic social issues, such as housing assumed a far reaching political significance at the time. Indeed, the housing issue became particularly significant after the Vorster government's use of housing, and specifically its restrictions on constructing further units as a means of promoting a return to the homelands.[51]

In general, demands expressed were strictly economic. Of all the strikes in 1973, 293 (by far the most) were ostensibly caused by either demands for better wages, or wage-related factors.[52] Fisher makes the point that traditionally South African managers have viewed their prerogative as absolute.[53] Consequently, wage demands may not only be economic, but also represent a challenge to far broader issues of control.[54] Thousands of Durban workers had resorted to collective action, with (as can be seen by the above), high levels of solidarity. This in itself represented a political act, no matter what the demands expressed were, when the official policy at the time towards strikes by blacks is borne in mind. In terms of a 1943 war measure that was never lifted, blacks were legally prohibited from striking. In addition, striking Durban workers often drew up long lists of demands (probably including community issues) with wages (the reason cited in the CSIR/NIPR survey) simply being the one at the head of the list.[55] Thus, demands for higher wages may be simply one of many other demands, others of which could well have been more political. It seems likely that Fisher's assertion could well hold true not only for the Durban strikes, but also for many other instances of strike action in South Africa as well. The fact that wages may only be the first of many demands should always be borne in mind. Although wage demands were central to the strikes, the IIE Report sees them as also being political - the large pay increases demanded from employers (far larger than workers could hope to receive) arguably showed a widespread dissatisfaction with the *status quo* and the desire for a better society.[56]

Significantly, black unemployment declined by some 2.3% from 15.8% to 13.5% from 1972-3.[57] Although the role of unemployment as a deterrent to striking in the South African context remains a complex one, conventional wisdom holds that declining unemployment will result in workers being more willing to risk their jobs by resorting to collective action. This could have been particularly the case with those Durban companies paying their workers less than R50 per month.

In his survey of workers involved in the strikes, Mare[58] notes that 98% of strikers surveyed said that they chose to strike from their own volition, and not as a result of pressure and/or intimidation from "instigators". Most of the strikes were of relatively short duration. Indeed, 70% of strikers surveyed by Mare said that they ended their strike as soon as their wage demands were acceded to.[59] Clearly there was a strong underlying dissatisfaction, but it can be argued that workers lacked the basic resources to press for anything more than readily realizable short-term demands.

The Unions and the Strikes

The established unions appear to have played little or no role in the disputes. Indeed, as Fisher[60] points out, it would have been virtually impossible at the time for any trade union legally to organize a strike of black workers. In fact, the all-white Building Workers' Union blamed

"the left" for permitting the situation to arise. Whilst other established unions blamed employers,[61] very little seems to have been done in the way of support. The one exception to this rule was the Textile Workers' Industrial Union (TWIU). Whilst many TWIU officials feared that the police might take action against them, the union did intervene in a few disputes. They achieved a notable success at Smith and Nephew, where they were instrumental in negotiating a significant pay increase for workers.[62] It appears that the decision to go on strike was largely reached independently by the workers themselves. It was far more viable for workers to adopt informal methods of collective organization, employing strategies such as "wildcat strikes" than to rely on the established unions.[63] It is clear that workers must have had some form of highly efficacious informal organization which, when combined with the high degree of relative deprivation, resulted in well organized "total strikes". In view of the limited coercive action taken by state and capital, it seems that a lack of formal organization could, at times, prove an asset. Workers had been very reluctant to elect spokesmen.[64] Indeed, workers often believed that requests by employers for "somebody to negotiate with" could simply be a ploy to identify activists who would then face dismissal.[65] The Durban strikes had the effect of encouraging workers to formalise their organization and establish new structures. As noted in the following sections, several new unions were established in the Durban region in the aftermath of the strikes. In contrast, the established trade unions, as du Toit[66] notes, "had reached a point of stagnation".

Buthelezi and the Strike Wave

Equally unclear is the role some have argued Chief Buthelezi played in the strike wave. In 1973 Buthelezi had yet to break with the ANC, or indeed the independent unions. The break with both these movements only came in the late 1970's. Buthelezi has argued that the split with the independent unions came when FOSATU failed to invite him to the launch of their Northern Natal branch.[67] He was, in fact, invited and a more likely explanation seems to be that the break followed Buthelezi's sacking of the pro-union councillor, Barney Dladla, who had gained great popularity amongst Zulu workers and could have thus posed some threat to Buthelezi's leadership.[68] Dladla was Buthelezi's Councillor for Community Development. He played a prominent role in several subsequent labour disputes in Natal. For example, he led a march of 5 000 striking workers at Frame Textiles's Pinetex (Durban) Mill in January 1974.[69] Nonetheless in 1973 many employers viewed Buthelezi as being the chief instigator of the strikes, although he was visiting the United States at the time the strike occurred.[70]

Fisher[71] argues that Buthelezi enjoyed much worker support at the time, and his anti-government stance could have served to strengthen the resolve of striking workers. However, such support must have been rather tenuous if the results of a 1975 survey by Webster[72] are anything to go by - when members of three emerging different trade unions (then Natal-based) CWIU, MAWU, and NUTW, were interviewed only 1% saw increased ties with KwaZulu as being of value in making worker organization more effective. On dubious ground, the SAIRR report into the strikes[73] argues that factors which could have caused the strikes include the homogeneous composition of the Zulu work-force and the coronation of King Goodwill. The latter, it is argued, caused an upturn in Zulu nationalism. However, Zulu nationalism has proved to be an intrinsically conservative force. Goodwill did intervene in the first of the Durban strikes, that at Coronation, offering to negotiate with management on behalf of workers. This proposal was initially rejected by the strikers, who argued that "you could not extinguish fire by words, only action".[74] Later, Prince Sithela Zulu persuaded them to accept Goodwill's offer, arguing that it would "lower their dignity" if they rejected him.[75] However, Buthelezi had meanwhile persuaded the king to withdraw from the dispute. Subsequently, the workers negotiated independently with management, led by Nathaniel Zulu, one of the few leaders at factory level who were prepared to give up the safety of anonymity. Nonetheless, Buthelezi did not publicly oppose the strike wave and later criticised the low wages prevalent in the Durban action.[76] Arguably, his failure to condemn the strikes could have been taken as tacit approval.

Black and Indian workers locked out by management at Frame Textiles. (Eastern Province Herald)

Indian Workers and the Strike Wave

Also of importance is the role that was played by Indian workers during the strikes. Most of the literature on the Durban strike wave describes it as a primarily black phenomenon. However, 1973 is characterized by an unusually high percentage of Indian workers taking part in strike action. In 1973 40 per 1 000 "Asian" workers struck, whilst none did so in 1972.[77] In comparison 31 per 1 000 blacks struck during 1973.[78] As the centre of strike action during this year was the Durban-Pinetown region (168 out of 369),[79] the area where most Indian South Africans reside, it seems fair to assume that there was a high degree of solidarity across racial barriers during the 1973 Durban strike wave. The 1974 IIE report[80] points out that many Indian workers seem to have joined the Durban Corporation strike. In addition, in a poll conducted at the time, most Indian workers supported the idea of non-racial unionism.[81] It could be argued that the success enjoyed by black workers during the initial strikes had the effect of encouraging Indian workers elsewhere in the district to resort to similar action.

Strikers march after delivering pay demands. (E. P. Herald)

Major Unions Founded

All in all, 229 281 work-days were lost thrugh strike action in 1973, whilst an average of 267 workers were involved per strike.[82] This represents a substantial increase over figures for the previous year, which can be taken as a reflection of the high degree of worker solidarity which exhibited itself during the Durban strike wave. This year is also significant in that it saw the emergence of the first independent unions, MAWU (Metal and Allied Workers Union) in May, and NUTW (National Union of Textile Workers) and CWIU (Chemical Workers Industrial Union) in October. MAWU was founded in Durban and may best be seen as the result of an increased consciousness (and arguably politicization) amongst workers, many who had taken part in the 1973 strike wave. The new unions were successors to the Durban Factory Workers's Benefit Fund, which, as noted earlier, had played a supportative role during the strike wave. The Durban region was to lead the rest of the country in the establishment of independent trade unions. Although the three new unions were originally Durban-based, they soon established themselves nationally. Thus, the long-term effects of the 1973 Durban strikes on wider power relations within society were considerable. This adds credence to the argument that strike action in itself may serve to increase the politicization of workers (see, for example, Dekker *et al*[83] on the 1972 Namibian strikes). Whilst the 1973 strike wave predated the formation of most of the independent unions, it can be argued that it helped create the conditions under which the independent black trade unions could emerge. The formation of these new unions soon resulted in the need for a co-ordinating body.[84] This led to the formation of the Trade Union Advisory and Co-Ordinating Council (TUACC). TUACC would eventually form the core of the Federation of South African Unions (FOSATU).

As can be seen by the above, 1973 saw not only a resurgence of strike action, but also the re-emergence of black trade unions. Both these events centred around the Durban region. What happened in the Durban region in 1973 is not only significant in that it revealed something of the region dynamics operating in contemporary Natal, but also in the far-reaching repercussions of the development of a new style of trade unionism and of widespread strike action. Significantly, the established trade unions had little formal involvement in the strikes. Nonetheless, a handful of officials, led by veteran trade unionist Harriet Bolton, acting in collaboration with University of Natal students, played a vital supportative role. In evaluating the course of the 1973 strike wave and the events that led up to it, some insights were hopefully gained into the forces underlying the start of a new period in South African labour history.

Endnotes

1. L. Schlemmer, 'The African Worker Views His Situation', *SAIRR Pamphlets*, 1975, p.5.
2. SA Reserve Bank, *Quarterly Bulletins* (Pretoria, 1974), p.12.
3. L. Schlemmer, 'The African Worker', p.5.
4. *Ibid.*
5. S. Friedman, *Building Tomorrow Today* (Johannesburg, 1987), p.42.
6. NUSAS, *SA Trade Unions* (Johannesburg, 1980), p.39.
7. S. Friedman, *Building Tomorrow Today*, p.42.
8. J. Maree, *An Analysis of the Independent Trade Unions* (Ph.D., UCT, 1987), p.2.
F. Fisher, 'Class Consciousness amongst Colonised Workers in SA', in T. Adler (ed.), *A Collection of Working Papers* (Johannesburg, 1977), p.342.
10. SAIRR, *1974 Race Relations Survey* (Johannesburg, 1974), p.68.
11. CSIR/NIPR, *Special Report: A Study of SA Strike Data* (Pretoria, 1983), pp. 45-47.
12. National Manpower Commission, *Certain Aspects of Strikes in RSA* (Pretoria, 1986), p.45.
13. S. Friedman, *Building Tomorrow Today*, p.43.
14. *Ibid.*
15. SALB, 'Too Late For Consultation: The Garment Workers Union Capitulates', *SA Labour Bulletin* 1(8), 1975, p.3.
16. *Ibid.*, p.2.
17. *Ibid.*, p.3.
18. SAIRR, *1972 Race Relations Survey* (Johannesburg, 1972), p.325.
19. *Ibid.*
20. *Ibid.*
21. *Ibid.*, p.326.
22. CSIR/NIPR, *Special Report: SA Strike Data*, pp. 45-47.
23. D. Dekker *et al*, 'Case Studies in African Labour Action in South Africa and Namibia', in R. Sandbrook and P. Cohen (eds.), *Development of the African Working Class* (London, 1975), p.221.
24. SAIRR, 'A View of the 1973 Strikes', *SAIRR Pamphlets*, 1973, p.226.
25. Institute for Industrial Education, *The 1973 Durban Strikes* (Durban, 1974), p.18.
26. *Ibid.*, p.16.
27. *Ibid.*
28. S. Friedman, *Building Tomorrow Today*, p.51.
29. Institute for Industrial Education, *The 1973 Durban Strikes*, pp. 16-18.
30. *Ibid.*
31. F. Fisher, 'Class Consciousness amongst Colonised Workers in SA', p.329.
32. *Ibid.*
33. Institute for Industrial Education, *The 1973 Durban Strikes*, pp. 16-18.
34. *Ibid.*
35. CSIR/NIPR, *Special Report: SA Strike Data*, p.37
36. D. Dekker *et al*, 'Case Studies', p.225.
37. Friedman, *Building Tomorrow Today*, p.50.
38. J. Maree & D. Budlender, 'Overview: State Policy and Labour Legislation', in J. Maree (ed.), *The Independent Trade Unions* (Johannesburg, 1987), p.17.
39. *Ibid.*, p.18.
40. J. Maree, *An Analysis of the Independent Trade Unions*, p.125.
41. S. Friedman, *Building Tomorrow Today*, p.50.
42. Institute for Industrial Education, *The 1973 Durban Strikes*, p.84.
43. *Ibid.*
44. *Ibid.*, p.83.
45. *Ibid.*, p.100.
46. F. Fisher, 'Class Consciousness', p.344.
47. *Ibid.*
48. *Ibid.*
49. *Ibid.*
50. SA Reserve Bank, *Quarterly Bulletins* (Pretoria, 1974), p.12.
51. D. Dekker *et al*, 'Case Studies', p.210.
52. CSIR/NIPR, *Special Report: SA Strike Data*, pp. 39-41.
53. F. Fisher, 'Class Consciousness', p.335.
54. *Ibid.*, p.355
55. *Ibid.*
56. Institute for Industrial Education, *The 1973 Durban Strikes*, p.101.
57. T. Bell and V. Padyachee, 'Unemployment in South Africa', *Carnegie Papers* 119, 1984, pp. 10-15.
58. G. Mare, 'The Strikes in 1973', *SAIRR Pamphlets*, 1975, p.21.
59. *Ibid.*, p.20.
60. F. Fisher, 'Class Consciousness', p.343.
61. Institute for Industrial Education, *The 1973 Durban Strikes*, p.18.
62. *Ibid.*
63. F. Fisher, 'Class Consciousness', p.347.
64. *Ibid.*, p.330.
65. *Ibid.*
66. M.A. du Toit, *South African Trade Unions* (Johannesburg, 1976), pp. 76.
67. P. Green, Trade Unions and the State of Emergency', *SA Labour Bulletin* 11(7), 1986, p.74.
68. J. Maree, "An Analysis of the Independent Trade Unions", p.349.
69. SAIRR, *1974 Race Relations Survey*, p.306.
70. G. Mare, 'The Strikes in 1973', p.24.
71. F. Fisher, 'Class Consciousness', p.332.
72. E. Webster, 'Survey of Durban Workers', in J. Maree (ed.), *The Independent Trade Unions*, (Johannesburg, 1979), p.28.
73. SAIRR, 'A View of the 1973 Strikes, p.226.
74. Institute for Industrial Education, *The 1973 Durban Strikes*, p.20.
75. *Ibid.*, p.19.
76. *Ibid.*
77. CSIR/NIPR, *Special Report: SA Strike Data*, pp. 18-25.
78. *Ibid.*, pp. 18-19.
79. *Ibid.*, pp. 45-47.
80. Institute for Industrial Education, *The 1973 Durban Strikes*, p.19.
81. *Ibid.*
82. National Manpower Commission, *Certain Aspects of Strikes in RSA*, p.64.
83. D. Dekker *et al*. 'Case Studies', p.231.
84. NUSAS, *SA Trade Unions*, p.26.