

05 February 2024

**LEGAL RESEARCH CONSULTANT OF ANIMAL LAW REFORM
SOUTH AFRICA**

Dear Sir

**ANIMAL LAW REFORM SOUTH AFRICA - REQUEST FOR ACCESS TO
INFORMATION**

We refer to the above matter which has been considered by our Information Officer.

Our reply is detailed below, which for ease of reference, has been set out under relevant subject matter headings,

Request

We refer to your Promotion of Access to Information Act, 2000 ("PAIA") request, sent by email to the Information Officer, Pieter Badenhorst of AFGRI Group Holdings Propriety Limited (hereinafter referred to as "AFGRI") which request we will hereinafter refer to as the "Request".

We have gone over your Request, including the duly completed:

- PAIA FORM 2: PART A - REQUEST FOR ACCESS TO INFORMATION – ANIMAL WELFARE as per (Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation 10] (“Form 2”); and

Your accompanying letter dated 13 December 2023, which sets out in detail the information / records which you are asking AFGRI to provide to your offices.

We have also considered the activities and objectives which are pursued by the Animal Law Reform South Africa NPC (hereinafter referred to as “the NPC”) read together with the reasons why the NPC is requesting access to the information detailed under your letter dated 13 December 2023, which is summed up below.

Purpose and objectives of the NPC

The Animal Law Reform South Africa is a not-for-profit organization, which inter alia,

- focuses on animal law and the intersection between animal wellbeing, human rights, and social justice.
- concerns itself with the animal protection movement in South Africa; and
- is made up of animal activists dedicated to the protection of animals.

In your letter of 13 December 2023, you refer to the requested access to information from AFGRI in a letter dated 17 November 2022 whereby the NPC was undertaking a project entitled “Laying Down the Facts: Corporate Accountability” (hereinafter referred to as the “Project”) which, as per your advices, had two primary interlinked goals:

- firstly, the fostering of interest in and understanding of the regulatory and policy regime governing chicken welfare in South Africa, and

- secondly, promoting more transparent practices, enhanced animal welfare, and more ambitious cage-free commitments by South African retailers, restaurants, and major brands.

One of the Project's outputs will be a public report setting out, among other things, the chicken welfare practices of key role players in the poultry sector, including major South African retailers, restaurants, and brands; and ranking the performance and commitments of selected companies

In your letter dated 13 December 2023, you refer to the 'the Second Period' of the Project in order to advance corporate accountability in South Africa's egg industry.

Reason why the information is sought

The information requested as stated under Form 2 is required for the protection of the environmental right, as provided for in section 24 of the Constitution; and more particularly, to enhance animal welfare for chickens.

It also appears that the information or records sought by the NPC will be used and be relied on by the NPC when conducting and finalizing the Project culminating in a public report, setting out, among other things, the chicken welfare practices of key role players in the poultry sector, including major South African retailers, restaurants, and brands; and ranking the performance and commitments of these role players.

The NPC has advised that the information and records detailed under the PAIA Request are requested in the public interest as part of the requestor's role as an advocate for animal welfare and will enable the requestor to enhance transparency and accountability, especially in relation to chicken welfare in South Africa.

The right which is being exercised or protected

As per the details of Form 2 read with the attached letter dated 13 December 2023, and following the above comments, it appears that the rights which the NPC are seeking to protect in relation to this specific request concerns chickens and more in particular the welfare of chickens when farmed, including without detracting from the generality thereof, when bred, raised, and subsequently slaughtered and sold into the consumer market.

Records requested

The records requested pertain to the animal welfare practices of the private body which are detailed under the NPC's letter dated 13 December 2023, which accompanied by Form 2 and which, as mentioned above, are specific to the treatment of chickens. These documents and / or records will be more specifically addressed below.

What AFGRI does and involvement in and / or relationship with the chicken/ poultry sector

AFGRI, and its respective subsidiaries and / or divisions does not breed, slaughter, or sell for consumption animal or poultry products.

It therefore is not involved in the farming, slaughtering or sale of poultry or livestock.

AFGRI instead supports the agricultural sector by providing those who participate in this industry with certain agricultural products and services, which are provided on a retail and wholesale basis.

Please visit the AFGRI website which will provide your NPC with a detailed overview of AFGRI and its operations and related activities and more importantly, with an overview of the types of goods and services which it provides, including:

- the operation of 33 retail stores and 28 fuel stations. These stores supply the agricultural community with fuel and oil supplies, farming tools and implements, fertilizers, pest control products, seeds, animal feeds, veterinary products, and work clothing.
- the management of grain which includes handling and storing of grains and oil seeds, which are sourced through AFGRI Grain Marketing and carried out by the AFGRI raw material procurement business.
- providing advice and solutions to those who operate grain mills, animal feed mills and who are involved in the oil crushing businesses throughout Africa.
- the provision of financial services and lines of credit to farmers and others who operate in the financial sector; and
- the manufacture and supply of animal feed products which are dispatched from the AFGRI depots, which products are of superior quality, and which are made from food safety compliant ingredients, manufactured with care and based on innovative technology, research and processes ensuring that animals receive optimal nutrition.

Our Reply

Following the above, whilst AFGRI and its divisions and subsidiaries do operate in the agricultural sector, AFGRI, and / or its various divisions and subsidiaries, are not directly or indirectly involved in the poultry business.

As a result, AFGRI is unable to provide the requested documents, which documents we list below together with the corresponding reasons why these documents cannot be made available:

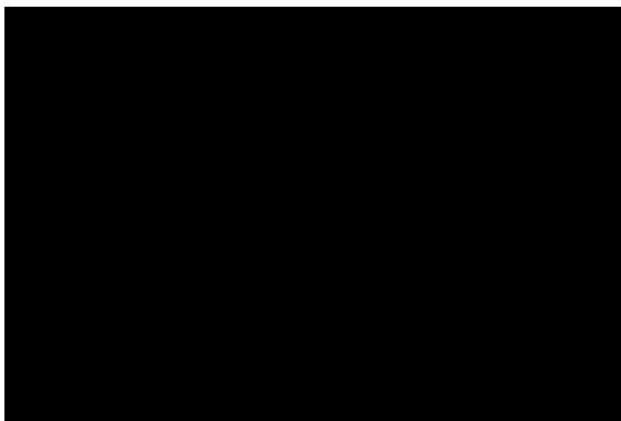
- Documents / records requested – which pertain to AFGRI Group's role in the egg supply chain for the period of 1 December 2022 to 30 November 2023 (the "Second Period").
- Please note that AFGRI Group does not farm livestock or poultry nor is it involved in the egg supply chain.

Attached as Annexure A hereto is our detailed response to each of the items of information requested in the Request.

Conclusion

We trust that you will find the above in order.

Should you not be satisfied with the response provided then please be advised that AFGRI has no internal appeal mechanism and you have a period of 180 days from the date of receipt of this response within which to launch an application in the high court regarding this decision.



ANNEXURE A: RESPONSE TO INFORMATION REQUEST

PART A: REQUEST FOR ACCESS TO INFORMATION – ANIMAL WELFARE

ITEM IN REQUEST	DESCRIPTION	OUR RESPONSE
1.1.	Annual and Sustainability Reports produced during the period.	<p>No reference to livestock, poultry or the egg supply chain housed in these Documents.</p> <p>In any event these are freely available on the AFGRI website at www.afgri.co.za</p>
1.2.	Legal Compliance: Any and all enforcement and compliance records issued during the period, including:	
1.2.1	Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof):	
1.2.1.1	Regulations Regarding the Grading, Packing and Marking of Eggs Intended for Sale in the Republic of South Africa of 31 May 2019, Notice 289 of 2019.	Not applicable to AFGRI – AFGRI is not involved in the egg supply chain.
1.2.1.2	The Animals Protection Act 71 of 1962 ("APA"), including any warnings/citations, and/or infringements issued in respect of any employees, contractors, or personnel in performing their duties.	Not applicable to AFGRI – AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.

1.2.1.3	The Meat Safety Act 40 of 2000.	Not applicable to AFGRI – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.2.1.4	The Animal Identification Act 6 of 2002.	Not applicable to AFGRI – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.2.1.5	The Animal Improvement Act 62 of 1998	Not applicable to AFGRI – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.2.1.6	The Veterinary and Para-Veterinary Professions Act 19 of 1982.	Not applicable to AFGRI – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry, nor does it offer veterinary services.
1.2.1.7	The Animal Diseases Act No. 35 of 1984.	Not applicable to AFGRI – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.2.1.8	The National Environmental Management Act 107 of 1998 ("NEMA").	<p>Compliance records limited to duty of care and emergency incidents as per NEMA, as AFGRI does not operate any activities which are listed, and which require an EIA or an ROD as per NEMA.</p> <p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement</p>

			<p>and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry</p>
1.2.1.9		<p>The National Environmental Management: Waste Act 59 of 2008 ("NEMWA").</p>	<p>Compliance records limited to duty of care and emergency incidents as per NEMWA, as AFGRI does not operate any activities which are listed, require an EIA or a Waste permit.</p> <p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p>

			Act not applicable – AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.2.1.10	The National Environmental Management: Air Quality Act 39 of 2004 ("NEMAQA").		<p>Compliance records limited to duty of care and emergency incidents as per NEMAQA, as AFGRI does not operate any activities which are listed, require an EIA or AEL or permit.</p> <p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
1.2.1.11	The National Water Act 36 of 1998.		Compliance records limited to duty of care and emergency incidents as per the Water Act (NWA and

			<p>WSA), as AFGRI does not operate any activities which are listed, require an EIA or water authorization or permit.</p> <p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
	1.2.2	Any information recording or containing details of inspections by the South African Police Service ("SAPS"), National Council of Societies on the Prevention of Cruelty to Animals ("NSPCA") and any Societies for the Prevention of Cruelty to Animals ("SPCA"), and any other relevant authority of animal welfare.	None
1.3	Charges laid, and judgments and orders handed down, including in any and all criminal and civil proceedings in which		None

	you were cited as a party relating to the aforementioned legislation.	
1.4	Internal Policies relating to Animal Welfare and Environmental matters applied or produced during the period.	None Not applicable to AFGRI – AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.5	Egg Production and Supply Chain	
1.5.1	Records relating to the number of chickens housed/processed per annum by your company and/or each of your suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.5.2	Records relating to the number of eggs produced per annum by your company and/or each of your suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.5.3	Records relating to nutrition of chickens laying eggs produced by your company or its suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.5.4	Records relating to the use of cages and type of cages used by your company or its suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.

1.5.5	Records relating to the stocking density of chickens laying eggs produced by your company or its suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.5.6	Records relating to the number of chickens and chicks culled in the production process of your company or its suppliers.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.6	Asset Register and Stock: Any and all records relating to AFGRI assets and stocks that may be relevant based on the aforementioned explanation of the Project.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.7	Membership records relating to any and all membership (present and past) relating to the egg, chicken, and poultry industry. This includes correspondence or documentation confirming, refusing, suspending, terminating, or otherwise relating to any membership of any of the following (as applicable):	
1.7.1	The South African Poultry Association ("SAPA").	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.7.2	SAPA Egg Association.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.7.3	SAPA Broiler Association.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.7.4	Livestock Welfare Co-ordinating Committee ("LWCC").	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.

1.7.5	South African Bureau of Standards ("SABS").	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.7.6	Animal Feed Manufacturers Association.	AFGRI Animal Feeds is a full member of the Animal Feeds Manufacturers Association ("AFMA") – the details of the membership can be found on the AFMA website and in particular, in the link below: https://www.afma.co.za/download/list-full-members/?wpdmdl=2286&refresh=6392f80a364021670576138
1.7.7	Any other poultry, egg or chicken organisations or associations that may be relevant based on the aforementioned description of the Project. (the "Associations", as applicable).	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.8.	Compliance with Association standards and requirements and Certification: Any and all records of compliance and/or non-compliance with third party standards and/or requirements, correspondence as applicable and certifications with/by the Associations and other third-party standards and/or requirements that may be relevant based on the aforementioned explanation of the Project.	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.9	Third Party Certification: Certificates/notices, letters and correspondence illustrating any third-party certifications, including:	

	1.9.1	Certificates/notices issued certification by A Greener World ("AGW"); and	illustrating	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
	1.9.2	Certificates/notices issued certification by SABS;	illustrating	Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
	1.9.3	Other third-party certifications that may be relevant based on the aforementioned explanation of the Project.		Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.10	Commitments: Records indicating any and all animal welfare-related commitments and progress towards these commitments, including:			
	1.10.1	Better Chicken Commitments ("BCC").		Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
	1.10.2	Cage-Free Commitments.		Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
	1.10.2.1	Other commitments that may be relevant based on the aforementioned explanation of the Project.		Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.
1.11	Public Statements: Any and all public statements relating to animal welfare regarding eggs, sourcing thereof or chickens under your control.			Not applicable to AFGRI and no records available - AFGRI is not involved in the egg supply chain, or breeding or farming of livestock or poultry.

PART B: REQUEST FOR ACCESS TO INFORMATION – ENVIRONMENTAL PROTECTION

ITEM IN REQUEST	DESCRIPTION	OUR RESPONSE
1.1	Legal Compliance: Any and all enforcement and compliance records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof): The Agricultural Product Standards Act 119 of 1990;	
1.1.1		No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.1.2.	The Marketing of Agricultural Products Act 47 of 1996;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
1.1.3	The Conservation of Agricultural Resources Act 43 of 1983;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>

1.1.4	The Fertilizers Farm Feeds Agricultural Remedies and Stock Remedies Act No. 36 of 1947;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
1.1.5	The Standards Act 24 of 1945;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
1.1.6	The Consumer Protection Act 68 of 2008;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings,</p>

			<p>citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
	1.1.7	The Competition Act 89 of 1998;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
	1.1.8	The Merchandise Marks Act 17 of 1941;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external)</p>

			specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.9	The Stock Exchange Control Act (Act No. 1 of 1985) and the JSE Listings Requirements;	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.10	The Hazardous Substances Act 15 of 1973;	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and

			agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.11	The Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972;	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.12	The Health Act 63 of 1977;	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).

			Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.13	The Spatial Planning and Land Use Management Act 16 of 2013;	<p>No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).</p> <p>Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.</p>
	1.1.14	The Carbon Tax Act 15 of 2019; and	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).

			Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.1.15	The National Environmental Management – Biodiversity Act 10 of 2004.	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).
			Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.2.		Auditing and inspection notices in terms of the National Environmental Management Act 107 of 1998 ("NEMA") and the Specific Environmental Management Acts ("SEMAS")	No enforcement records issued during the period, including: Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof).

		Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.3	Records of environmental authorisation (whether granted or refused) in respect of relevant listed activities, as applicable, including activities 3; 4; 5; 8; 38; 40; and 43 in terms of NEMA.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.4	Records related to section 24F, 24G, 49A and 49B of NEMA	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
15.	Records demonstrating the reasonable measures in place required by section 28 of NEMA, which are necessary to protect the environmental right.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.6	Sourcing of feed for layer hens in the egg industry	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.6.1 Records relating to where your company and/or each of your suppliers source feed for layer hens from;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.6.2 Records relating to what your company and/or each of your suppliers feed layer hens;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.6.3	Records relating to the research/ resources relied upon by your company and/or each of your suppliers when sourcing feed.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.7	The Consumer Protection Act	
1.7.1	Records which show if your company and/or each of your suppliers has been reported to advertising standards agencies / regulatory bodies / tribunals such as the Advertising Regulatory Board of South Africa ("ARB"), the Advertising Standards Authority ("ASA"), the Consumer Protection Commission (part of the National Consumer Commission ("NCC")), the Competition Commission of South Africa ("CCSA"), Consumer Goods Council South Africa ("CGCSA") etc. for complaints about the marketing, advertising, labelling, etc. of their products - or any other matter of an environmental or animal welfare related nature - for the period;	AFGRI has not been reported for any complaints about the marketing, advertising, labelling, etc. of their products - or any other matter of an environmental or animal welfare related nature - for the period.
1.7.2	Records relating to details and outcomes of any proceedings against your company and/or each of its suppliers in respect of point 1 above.	Not applicable

1.7.3	Records relating to how your company and/or each of your suppliers label eggs, egg products and/or products containing eggs when being sold and/or advertised to consumers. For example, should your company and/or each of your suppliers sell or make use of eggs that are sourced from caged egg farming practices, do your products have a label with the word 'caged' on it in accordance with the Animal Agricultural Products Standards Act 119 of 1990?	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.8	By promoting transparency and accountability, these measures contribute to a healthier, more informed, and responsible egg industry. As such, we request records relating to your company and/or each of your suppliers' Environmental, Social and Governance policies, plans, programmes, etc.	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.9	Records relating to any emergency incidents in terms of Section 30A of NEMA and activities associated therewith during the period. As such, we request access to records relating to emergency incidents applicable to your company and/or each of your suppliers.	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.10	Avian Influenza ("Bird Flu")	
1.10.1	Records relating to whether your company and/or each of your suppliers have been affected by bird flu during the period;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.10.2	Records relating to the number of chickens that your company and/or each of your suppliers have killed as a result of bird flu;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.10.3	Records relating to policies/ plans put in place by your company and/or each of your suppliers to address bird flu outbreaks; and	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.10.4	Records relating to your company and/or each of your suppliers' waste management policies /plans for the disposal of infected bird carcasses.	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.11	Cage Farming in the industry	
1.11.1	Records relating to your company and/or each of your suppliers' justification of the use of cages. For example, recommendations or scientific studies including, but not limited to a report published by the National Agricultural Marketing Council ("NAMC") commissioned by the South African Poultry Association ("SAPA"); and	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.11.2	Records relating to costing done by your company and/or each of your suppliers to transition to cage-free egg farming systems.	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12	Energy Usage: In terms of NEMA and other applicable legislation including the Carbon Tax Act 15 of 2019 and the National Energy Act 34 of 2008;	

1.12.1	Records relating to your company and/or each of your suppliers' reliance on renewable energy sources;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12.2	Records relating to your company and/or each of your suppliers' renewable energy policies or plans;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12.3	Records relating to the percentage of energy that is used for egg production/ keeping Layer Hens/ any other aspect of the egg supply chain by your company and/or each of your suppliers;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12.4	Records relating to your company and/or each of your suppliers' greenhouse gas emissions ("GHG") prevention plans/policies;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12.5	Records relating to the measurement and/or quantity of GHG emissions of your company and its suppliers;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.12.6	Records relating to your company and/or each of your suppliers' mechanisms which are in place to offset loadshedding	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.13	Water Usage: In accordance with section 19, 21 and 22 of the National Water Act 36 of 1998 ("NWA"), and any other applicable legislation:	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.13.1	Records relating to your company and/or its suppliers' water use license for the period;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.	
1.13.2	Records relating to your company and/or its suppliers' annual water usage;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.	
1.13.3	Records relating to the percentage of water that is used for egg production/ keeping Layer Hens/ any other aspect of the egg supply chain by your company and/or each of your suppliers;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry. Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.	
1.13.4	Records relating to your company and/or each of your suppliers' water use policy;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.	
1.13.5	Records relating to your company and/or each of your suppliers' water pollution prevention plans	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.	
1.14	Waste Management: In terms of section 12, 16, 17 and 25, the National Environmental Management: Waste Act 59 of 2008 ("NEMWA"), and other applicable legislation, including:		

1.14.1	Records relating to your company and/or each of your suppliers' waste management policy/ plan;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.14.2	Records relating to your company and/or each of your suppliers' waste management policy/ plan for the transportation and disposal of carcasses which are infected with disease;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.14.3	Records relating to your company and/or each of your suppliers' waste management policy/ plan for the disposal of carcasses of male chicks that have been culled;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.14.4	Records relating to your company and/or each of your suppliers' implementation of a circular waste feeding system;	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.14.5	Records relating to your company and/or each of your suppliers' waste recycling policy/ plan.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.15	Air Quality: In terms of section 21, 27, 31 and 38 of the National Environmental Management: Air Quality Act 39 of 2004 ("NEMAQA") and other applicable legislation, to assess your company and/or your suppliers' commitment to preventing air pollution and improving air quality effectively:	
1.15.1	Records relating to your company and/or each of its suppliers' air pollution prevention plans / policies	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

	1.15.2	Records relating to your company and/or each of its suppliers' emission inventories which record the types and quantities of pollutants released into the air;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.15.3	Records relating to your company and or/each of its suppliers' air quality monitoring data;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.15.4	Records relating to your company and/ or each of its suppliers' use of pollution control equipment.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.16	Soil Quality: In terms of section 36, 37, 38, 39, 40 and 41 of the NEMWA and other applicable legislation:		
	1.16.1	Records relating to your company and/or each of its suppliers' soil pollution prevention plans / policies	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.16.2	Records relating to your company and/or each of its suppliers' soil management plans;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.16.3	Records relating to your company and/or each of its suppliers' chemical usage, including for pesticide and fertilizer application, types, quantities, and application rates etc.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.16.4	Records relating to your company and or/each of its suppliers' soil conservation training;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

	1.16.5	Records relating to your company and/or each of its suppliers' soil health indicators	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.17		Environmental or sustainability commitments: records relating to your company and/or each of your suppliers' environmental commitments, progress towards these commitments.	
	1.17.1	Sustainability commitments	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.17.2	Net Zero (Carbon Footprint) commitments	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.17.3	Renewable energy use commitments;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.17.4	Water conservation commitments;	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.17.5	Other commitments that may be relevant based on the explanation of the Project	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
1.18		Social and Ethics Committee: access to records relating to your company and/committee's terms of reference, minutes for the period and any reports and related supporting documentation.	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.19	Environmental membership records: records relating to any or all membership (present and past) with environmental bodies and/ or associations. This includes corresponding or documentation confirming, refusing, suspending, terminating, or otherwise relating to any membership of any of the following (as applicable) ("the Associations"):		
	1.19.1	Sustainability Initiative of South Africa ("SIZA");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.2	Sustainable Retailer Forum	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.3	The South African Plastics Recycling Organization ("SAPRO");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.4	The Environmental Education Association of Southern Africa ("EEASA");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.5	The Wildlife and Environment Society of South Africa ("WESSA");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.6	The South African Photovoltaic Industry Association ("SAPVIA");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	1.19.7	National Association of Clean Air ("NACA");	Act not applicable – AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.

1.20	1.19.7	Any other environmental organisations or associations that may be relevant based on the aforementioned description of the Project (the "Associations", as applicable).	Not Applicable as AFGRI is not involved in Egg supply chain, or breeding or farming of livestock or poultry.
	Compliance with association standards and requirements and certification. Records evidencing (non)compliance with standards, requirements, codes of practice, certification schemes, etc. of relevant industry associations, which in turn demonstrate your company's (non)compliance with the environmental right.		Not Applicable