

To:

ANIMAL LAW REFORM SOUTH AFRICA

Dear Sirs,

RE: ANIMAL LAW REFORM SOUTH AFRICA | CHICKENLAND (PTY) LTD T/A NANDO'S

1. We refer to Animal Law Reform South Africa's (hereinafter referred to as "ALRSA") Request for Access to Information dated 13 December 2023 and your email of 20 May 2024 (hereinafter referred to as "your request") and confirm, again, that we act on behalf of Chickenland (Pty) Ltd t/a Nando's (hereinafter referred to as "our client").

and every allegation contained in your request and/or previous emails under reply, and our failure to do so should not be construed as an admission or otherwise of the correctness thereof. Our client's rights to deal with those allegations at the appropriate forum and at the appropriate time remain strictly and expressly reserved.

3. We have considered your request for access to our client's records pertaining to, *inter alia*, egg chain supply in terms of the Promotion of Access to Information Act 2 of 2000 (hereinafter referred to as "PAIA"), which we have been instructed to refuse on, *inter alia*, the following grounds:-

- 3.1. Your request fails to meet the mandatory stipulated procedural requirements in section 53(2)(d) of PAIA

solely based on animal cruelty and ALRSA is not a statutory body empowered by any law to protect, uphold, investigate, or police animal welfare or animal cruelty. As such, ALRSA has no right to protect and/or enforce in this regard.



- 3.3. Your request fails to (i) set out a substantive explanation or justification as to why the records are required for the exercise or protection of an enforceable right (if any); and (ii) provide how the requested information would assist ALRSA in exercising or protecting an enforceable right (if any).
4. In the circumstances, ALRSA may proceed to access our client's public information and documentation which is accessible on their respective websites to the public, or to pursue the appropriate avenue/s as provided for in PAIA.
5. In addition to the above, any suggestion by ALRSA that our client is participating in harmful activities to the environment and/or human rights is baseless and rejected with the contempt it deserves. We caution ALRSA not to harm our client's reputation and/or make statements that are defamatory of nature.
6. Our client's rights remain reserved.

Yours,

Edward Nathan Sonnenbergs Inc.

Per:

[REDACTED]

(transmitted electronically and not signed)