
AFFIDAVIT

I, the undersigned,

[REDACTED]

do hereby make oath and state that:

1. I am an adult male employed by AFGRI Group Holdings Proprietary Limited, ("**AFGRI**") having its head office at [REDACTED], as Director: Legal, Risk and Compliance.
2. The facts contained herein are within my personal knowledge, unless otherwise indicated, and are to the best of my knowledge and belief both true and correct.
3. Legal submissions as contained herein are made on the advice of AFGRI's legal representatives, which advice I understand and accept to be correct and as such I accordingly adopt the said advises on behalf of AFGRI in this affidavit.
4. I have been appointed, as per the provisions of the Promotion of Access to Information Act, 2 of 2000 (PAIA), read with the provisions of the Protection of Personal Information Act, 14 of 2013 (POPIA), as the AFGRI Information Officer.
5. On or about 17 November 2022, AFGRI received an email from a Mr Cheslyn Ceaser, acting on behalf of the Animal Law Reform South Africa Outreach, alternatively referred to as the Animal Law Reform South Africa NPC (hereinafter referred to as "the NPC") including attached to such email, a duly completed
 - 5.1 **Form C - Request for Access to Record of Private Body** as per (Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation 10] (Form C"); and
 - 5.2 **letter dated 17 November 2022**, which set out in detail the information / records which the NPC was asking AFGRI to provide,which request was brought under PAIA and which will herein after be referred to as the "PAIA request".


[REDACTED]

5.3 On perusal of the PAIA request and consideration of the records that were being requested, I have reasonable grounds for believing that the records do not exist, and that accordingly it is not possible to give these records to the NPC. The steps taken which led me to this conclusion are as follows:

5.3.1 I considered the activities and objectives which are pursued by the NPC; together with the reasons why the NPC is requesting access to said records detailed under the NPC letter dated 17 November 2022.

5.3.2 I considered the activities and objectives pursued by AFGRI, and its various divisions and subsidiaries and in this regard was unable to locate or find any of the requested records largely due to the fact that AFGRI does not farm livestock or poultry, nor is it involved in the egg supply chain.

5.3.3 This exercise took into account each and every document or record requested by the NPC, which document and record were itemized under a detailed reply submitted to the NPC dated 9 December 2022 and a subsequent reply dated 10 February 2023, which included an explanation as to why these records did not exist or where not available.



I CERTIFY that this affidavit was signed and sworn to before me at CENTURION on this the ____ day of February 2023, by the deponent who acknowledged that he knew and understood the contents of this affidavit, had no objection to taking this oath, considered this oath to be binding on his conscience and who uttered the following words: "I swear that the contents of this affidavit are true, so help me God".

