
**AFFIDAVIT OF [REDACTED] IN TERMS OF SECTION 55(1) OF
THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000**

I, the undersigned,

[REDACTED]

do hereby make oath and say:

1. I am an adult male employed by Quantum Foods Holdings Limited, situated at 11 Main Road, Wellington, 7655 ("**Quantum Foods**"). I make this affidavit in my capacity as the Information Officer of Quantum Foods. I am duly authorised to depose to this affidavit on behalf of Quantum Foods.
2. Save as appears from the context, the facts contained in this affidavit are within my personal knowledge and belief and are, to the best of my knowledge and belief, both true and correct.

BACKGROUND

3. On 16 November 2022, Quantum Foods received a letter from Animal Law Reform South Africa ("**ALRSA**"), requesting a large number of records from Quantum Foods for the period of 1 November 2018 to 30 November 2022 ("**the request**").
4. On 12 December 2022, Quantum Foods sent a letter to ALRSA, informing it that Quantum Foods would not be able to respond to the request within the statutory 30 day period as (i) the request relates to several records and

[REDACTED]

requires a search through a large number of documents, and as such compliance with the original period would unreasonably interfere with Quantum Foods's activities; and (ii) consultation among Quantum Foods's divisions was necessary and desirable to decide upon the request that could not reasonably be completed within the original period. As such, Quantum Foods informed ALRSA, in compliance with PAIA, that it was extending the period by a further 30 days, until 19 January 2023.

RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

5. Quantum Foods responded to the request on 19 January 2023. In responding to the request, Quantum Foods confirmed that the records relating to the following information do not exist for the period of 1 November 2018 to 30 November 2022:


5.1 Enforcement and compliance records, 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 the following legislation (paragraphs 6.2.1.2 to 6.2.1.5 and 6.2.1.9 of the request):

5.1.1 the Animals Protection Act, 1962 including any warnings / citations, and/ or infringements issued in respect of any employees, contractors or personnel in performing their duties;

5.1.2 the Meat Safety Act, 2000;

5.1.3 the Animal Identification Act, 2002;



- 5.1.4 the Veterinary and Para-Veterinary Professions Act, 1982; and
 - 5.1.5 the National Environmental Management: Air Quality Act, 2004.
 - 5.2 charges laid, and judgments and orders handed down, including in any and all criminal and civil proceedings in which Quantum Foods were cited as a party relating to the legislation mentioned in the request (paragraphs 6.3 of the request);
 - 5.3 membership records relating to any and all membership (present and past) relating to the egg, chicken and poultry industry, including correspondence or documentation confirming, refusing, suspending, terminating, or otherwise relating to any membership of the following (paragraphs 6.7.4 to 6.7.6 of the request):
 - 5.3.1 Livestock Welfare Co-ordinating Committee;
 - 5.3.2 South African Bureau of Standards;
 - 5.3.3 Sustainable Retailer Forum;
 - 5.4 Certificates/notices issued illustrating certification by "A Greener World" and other third-party certifications that may be relevant based on the explanation in the request (paragraph 6.9 of the request); and
 - 5.5 Records indicating any and all animal welfare-related commitments and progress towards these commitments, including Better Chicken Commitments, Cage-Free Commitments and other commitments that are relevant based on the aforementioned explanation in the request (paragraphs 6.10.1 to 6.10.3 of the request).
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6. My colleagues at Quantum Foods, [REDACTED] and [REDACTED] [REDACTED] and I made a diligent search, but despite taking all reasonable steps, which included searching our database and discussions with the relevant senior operations management and executives to locate the records, the records cannot be found.
7. Quantum Foods is therefore unable to grant the requester access to these records.
- [REDACTED]

The Deponent has acknowledged that the Deponent knows and understands the contents of this affidavit, which was signed and sworn to or solemnly affirmed before me at WELLINGTON on 19 January 2023, the regulations contained in Government Notice No. R1258 of 21 July 1972, as amended, and Government Notice No. R1648 of 19 August 1977, as amended, having been complied with.

[REDACTED]

**CONFIRMATORY AFFIDAVIT TO THE AFFIDAVIT OF A [REDACTED]
[REDACTED] IN TERMS OF SECTION 55(1) OF THE PROMOTION OF ACCESS
TO INFORMATION ACT, 2000**

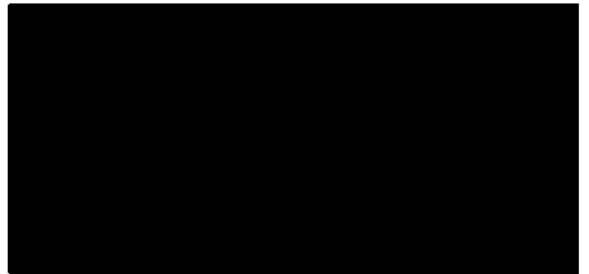
I, the undersigned,

[REDACTED]

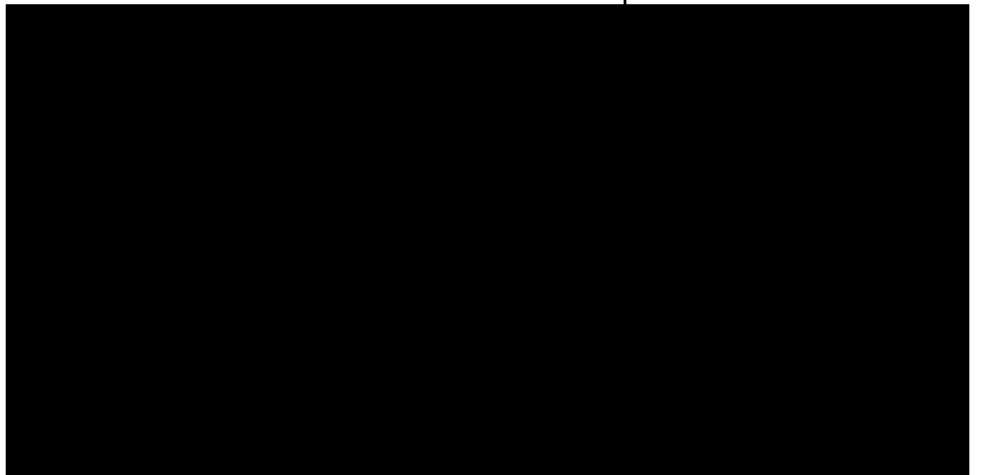
do hereby make oath and say:

1. I am an adult female, employed by Quantum Foods Holdings Limited, situated at 11 Main Road, Wellington, 7655 ("Quantum Foods"). I make this affidavit in my capacity as the Company Secretary and Legal Advisor of Quantum Foods.
2. Save as appears from the context, the facts contained in this affidavit are within my personal knowledge and belief and are, to the best of my knowledge and belief, both true and correct
3. I have read and considered the confirmatory affidavit of [REDACTED] dated 19 January 2023 and confirm the correctness of the content thereof insofar as it relates to me. In particular, I confirm that I assisted [REDACTED] in searching Quantum Foods' database and having discussions with the relevant senior operations management and executives to locate the records. I confirm that, despite a diligent search, the records listed in [REDACTED] affidavit were not found.

[REDACTED]



The Deponent has acknowledged that the Deponent knows and understands the contents of this affidavit, which was signed and sworn to or solemnly affirmed before me at WELLINGTON on 19 January 2023, the regulations contained in Government Notice No. R1258 of 21 July 1972, as amended, and Government Notice No. R1648 of 19 August 1977, as amended, having been complied with.



CONFIRMATORY AFFIDAVIT TO THE AFFIDAVIT OF [REDACTED]
[REDACTED] IN TERMS OF SECTION 55(1) OF THE PROMOTION OF ACCESS
TO INFORMATION ACT, 2000

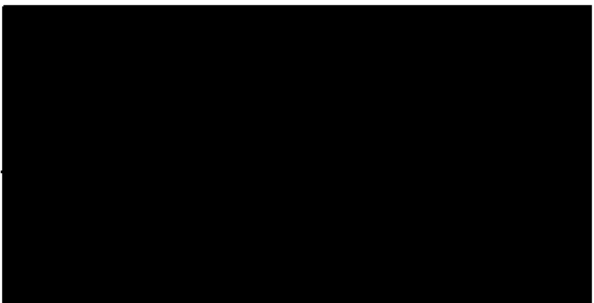
I, the undersigned,

[REDACTED]

do hereby make oath and say:

1. I am an adult female, employed by Quantum Foods Holdings Limited, situated at 11 Main Road, Wellington, 7655 ("Quantum Foods"). I make this affidavit in my capacity as the Executive - Egg Business of Quantum Foods.
2. Save as appears from the context, the facts contained in this affidavit are within my personal knowledge and belief and are, to the best of my knowledge and belief, both true and correct
3. I have read and considered the confirmatory affidavit of [REDACTED] dated 19 January 2023 and confirm the correctness of the content thereof insofar as it relates to me. In particular, I confirm that I assisted [REDACTED] in searching Quantum Foods' database to locate the records. I confirm that, despite a diligent search, the records listed in [REDACTED] affidavit were not found.

[REDACTED]



The Deponent has acknowledged that the Deponent knows and understands the contents of this affidavit, which was signed and sworn to or solemnly affirmed before me at Wellington on 19 January 2023, the regulations contained in Government Notice No. R1258 of 21 July 1972, as amended, and Government Notice No. R1648 of 19 August 1977, as amended, having been complied with.

