

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA**

CASE NO: 50779/17

In the matter between:

MINING AND ENVIRONMENTAL JUSTICE COMMUNITY NETWORK OF SOUTH AFRICA	First Applicant
GROUNDWORK	Second Applicant
EARTHLIFE AFRICA, JOHANNESBURG	Third Applicant
BIRDLIFE SOUTH AFRICA	Fourth Applicant
ENDANGERED WILDLIFE TRUST	Fifth Applicant
FEDERATION FOR A SUSTAINABLE ENVIRONMENT	Sixth Applicant
ASSOCIATION FOR WATER AND RURAL DEVELOPMENT	Seventh Applicant
BENCH MARKS FOUNDATION	Eighth Applicant
and	
MINISTER OF ENVIRONMENTAL AFFAIRS	First Respondent
MINISTER OF MINERAL RESOURCES	Second Respondent
ATHA-AFRICA VENTURES (PTY) LTD	Third Respondent
THE MABOLA PROTECTED ENVIRONMENT LANDOWNERS ASSOCIATION	Fourth Respondent
MEC FOR AGRICULTURE, RURAL DEVELOPMENT, LAND AND ENVIRONMENTAL AFFAIRS, MPUMALANGA	Fifth Respondent

AFFIDAVIT

I,

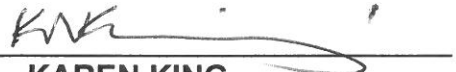
KAREN KING

state under oath that:

- 1 I am a professional hydrologist and soil scientist. From 16 July 2012 to 30 December 2016 I was employed first as a Senior Hydrologist and then as the Surface Water and Soils Unit Manager with GCS (Pty) Ltd (GCS), an environmental, water and consulting company based in South Africa.
- 2 I have the following qualifications: a Bachelor of Science (with Honours) and a Master of Science in Hydrology, both obtained at the University of KwaZulu-Natal. I have 13 years' experience in the engineering hydrology and soil science fields in the UK and South Africa. I am a Professional Natural Scientist (Reg. No. 400035/11) registered with the South African Council for Natural Scientific Professions (SACNASP).
- 3 My key areas of expertise include mining and development hydrology, surface water availability studies, water resources management, wetland delineation by soils, soil science, and related risk assessments and management plans.
- 4 The facts set out in this affidavit fall within my personal knowledge and belief, except where the context indicates otherwise, and are true and correct.
- 5 I have read the founding affidavit deposed to by Thelma Thandekile Nkosi and the supplementary founding affidavit deposed to by Sven Eaton Patrick Peek

and confirm that both of their contents are true and correct insofar as they pertain to me.


- 6 In particular, I confirm that I co-authored the report by GCS entitled "*IWULA [integrated water-use licence application], IWUL [integrated WUL] and Specialist Investigation/Studies Review of the (proposed) Yzermyn Colliery Mpumalanga*", dated 18 November 2016, revised on 1 December 2017, referred to as "the GCS review" in the founding affidavit and as "the original GCS review" and "the revised GCS review" in the supplementary founding affidavit, and that I undertook certain of the work described in the reports.
- 7 I confirm that the statements in the founding affidavit and supplementary founding affidavit regarding the aforesaid GCS reports and their findings are accurate.


KAREN KING

I certify that:

1. the deponent acknowledged to me that he knows and understands the contents of this declaration;
2. the deponent thereafter uttered the words "I truly affirm that the contents of this declaration are true";
3. the deponent signed this declaration in my presence at the address set out hereunder on 18 **December 2017**.




COMMISSIONER OF OATHS
Full names: *Mairéla Mouton*
Address: *PO 2501 Ross Mayside*
Capacity: *costable* *SANDTON*