

IN THE HIGH COURT OF SOUTH AFRICA

WESTERN CAPE DIVISION, CAPE TOWN

CASE NO. 13446/2020

In the matter between :

CENTRE FOR ENVIRONMENTAL RIGHTS NPC Applicant

and

MINISTER OF ENVIRONMENT, FORESTRY AND FISHERIES First Respondent

MINISTER OF MINERAL RESOURCES AND ENERGY Second Respondent

**REGIONAL MANAGER: MINERAL REGULATION,
WESTERN CAPE REGIONAL OFFICE** Third Respondent

MINERAL SANDS RESOURCES (PTY) LTD Fourth Respondent

NORTH WESTERN CAPE MINING FORUM Fifth Respondent

RAAKVAT BOERDERY (Edms) Bpk Sixth Respondent

MERLE SOWMAN Seventh Respondent

**MEC FOR DEPARTMENT OF ENVIRONMENTAL
AFFAIRS AND DEVELOPMENT PLANNING
WESTERN CAPE GOVERNMENT** Eighth Respondent

NOTICE OF OPPOSITION

**TO: THE REGISTRAR OF THE ABOVE HONOURABLE COURT
THE HIGH COURT OF SOUTH AFRICA (WESTERN CAPE
DIVISION, CAPE TOWN)
35 Keerom Street
Cape Town
8001**

**AND TO: CENTRE FOR ENVIRONMENTAL RIGHTS
Applicant's Attorneys
2nd Floor, Springtime Studios
1 Scott Road, Observatory
Cape Town
Tel: 021 447 1647
Email: lgovindsamy@cery.org.za / zomar@cer.org.za
Ref: Leanne Govindsamy / Zahra Omar**

AND TO: **MINISTER OF ENVIRONMENT, FORESTRY AND FISHERIES**
First Respondent
Environment House
473 Steve Biko Road (Cnr Steve Biko and Soutpansberg Roads)
Arcadia
Pretoria
Fax: 012 328 4254
Email: msipilica@environment.gov.za / minister@environment.gov.za
C/O THE STATE ATTORNEY
Slau Building, 316 Thambo Sehume Street
Cnr Thabo Sehume & Francis Baard Streets
Pretoria
Tel: 012 309 1502
Email: StateAttorneyPretoria@justice.gov.za

AND TO: **MINISTER OF MINERAL RESOURCES AND ENERGY**
Second Respondent
4th Floor, Building 2C
Trevenna Campus
75 Meintjies Street, (Cnr Meintjies and Francis Baard Streets)
Sunnyside
Pretoria
Fax: 012 444 3145
Email: Pieter.alberts@dmr.gov.za
C/O THE STATE ATTORNEY
Slau Building, 316 Thambo Sehume Street
Cnr Thabo Sehume & Francis Baard Streets
Pretoria
Tel: 012 309 1502
Email: StateAttorneyPretoria@justice.gov.za

AND TO: **NORTH WESTERN CAPE MINING FORUM**
Fifth Respondent
Beehive 23
A.A.S. Le Fleur Street
Vredendal North
West Coast
Tel: 063 806 1277
Email: nwcminingforum@gmail.com

AND TO: **RAAKVAT BOERDERY (EDMS) BPK**
Sixth Respondent
PO Box 42
Koekenaap
8146
Western Cape
Email: Raakvat@namakwanet.co.za

AND TO: **MERLE SOWMAN**
Seventh Respondent
7 Linden Way
Constantia Nek Estate
Hout Bay
Western Cape
Email: merle.sowman@uct.ac.za

AND TO: **MEC FOR DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND
DEVELOPMENT PLANNING, WESTERN CAPE GOVERNMENT**
Eighth Respondent
8th Floor, Utilitas Building
1 Dorp Street
Cape Town
Email: Pieter.vanZyl@westerncape.gov.za

S I R S

PLEASE TAKE NOTICE that the abovementioned Fourth Respondent hereby gives notice of its intention to oppose the application and appoints the address of its attorneys as set out hereunder as the address at which he will accept service of all processes and documents in this matter.

DATED at **CAPE TOWN** this 13th day of **OCTOBER 2020**

R.P.



FOURTH RESPONDENT'S ATTORNEYS
SHEPSTONE & WYLIE ATTORNEYS DURBAN
24 Richefond Circle
Ridgeside Office Park
Umhlanga Rocks
Tel: (031) 575 7000
Fax: (031) 575 7200

(Ref: I Sampson/km/TRAN29887.22)

C/O SHEPSTONE & WYLIE ATTORNEYS CAPE TOWN

10th Floor

2 Long Street

Cape Town

Tel: 021 419 6495

Email: masi.ncube@wylie.co.za

(Ref: M Z Ncube/TRAN29887.22)