

**IN THE HIGH COURT OF SOUTH AFRICA
EASTERN CAPE DIVISION, GRAHAMSTOWN**

CASE NO:

In the matter between

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| BORDER DEEP SEA ANGLING ASSOCIATION | First Applicant |
| KEI MOUTH SKI BOAT CLUB | Second Applicant |
| NATURAL JUSTICE | Third Applicant |
| GREENPEACE ENVIRONMENTAL ORGANISATION | Fourth Applicant |

and

| | |
|--|-------------------|
| MINISTER OF MINERAL RESOURCES AND ENERGY | First Respondent |
| MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT | Second Respondent |
| BG INTERNATIONAL LIMITED | Third Respondent |
| SHELL EXPLORATION AND PRODUCTION SOUTH AFRICA BV | Fourth Respondent |
| IMPACT AFRICA LIMITED | Fifth Respondent |

CONFIRMATORY AFFIDAVIT

I, the undersigned,

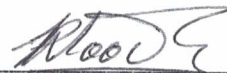
POOVALINGUM MOODLEY

do hereby make oath and declare as follows:

1. I am an adult male and executive director of the Third Applicant. I have the necessary authority to institute this litigation on behalf of the Third Applicant.



2. The contents of this affidavit are true and correct and fall within my personal knowledge, unless otherwise stated or clear from the context.
3. I have read the final draft of the founding affidavit of the First Applicant and confirm that the statements in so far as they relate to the Third Applicant are true and correct.
4. Natural Justice is a public, non-profit organisation established with the object of providing legal support to indigenous peoples and local communities in the form of information, advice, advocacy and training about the environment and their rights to their territories, cultures and resources. The organisation also has the object of ensuring the interests of communities are effectively represented in the development and implementation of domestic and international law and policy.
5. Natural Justice is opposed to the Third to Fifth Respondents' exploration for oil and gas at the proposed location along the Wild Coast, and the consequent extraction of those resources. It associates itself with the contentions and allegations made and advanced by the First Applicant.
6. The Third Applicant requests that this Honourable Court grant the relief sought as per the notice of motion.




POOVALINGUM MOODLEY



I hereby certify that the deponent has acknowledged that he:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to taking the oath;
- (c) considers the oath to be binding on his conscience.

Thus signed and sworn to before me, at *Grabouw* on 29 November 2021.



COMMISSIONER OF OATHS

NAME: _____
CAPACITY: Gregory John Claughton
Notary Conveyancer and Practising Attorney,
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