

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

Case No: 32323/22

In the matter between:

ALL TRUCK DRIVERS FORUM AND ALLIED SOUTH AFRICA Applicant

In re:

HELEN SUZMAN FOUNDATION Applicant

**CONSORTIUM FOR REFUGEES AND
MIGRANTS IN SOUTH AFRICA** Intervening Party

and

MINISTER OF HOME AFFAIRS First Respondent

DIRECTOR-GENERAL OF HOME AFFAIRS Second Respondent

**HSF'S ANSWERING AFFIDAVIT IN RESPONSE TO APPLICANT'S
APPLICATION FOR LEAVE TO INTERVENE AS RESPONDENT**

I, the undersigned,

NICOLE FRITZ

do hereby make oath and state that:

- 1 I am the Executive Director of the Helen Suzman Foundation ("**HSF**"), the first applicant in main application in this matter, under the above case number ("**HSF application**"). I was the deponent to the founding affidavit

in HSF application. The facts in this affidavit are within my personal knowledge, unless where the context indicates otherwise and, are both true and correct.

- 2 Where I make legal submissions, I do so on the advice of the HSF's legal representatives. I will use the same abbreviations and terms as used in the HSF's previous affidavits in the HSF application.

INTRODUCTION AND OVERVIEW

- 3 I have read the founding affidavit deposed to by Mario Khumalo ("**Mr Khumalo**") on behalf of the All Truck Drivers Forum and Allied South Africa ("**Truck Drivers Forum**") in support of its application to intervene as a third respondent in the HSF application, dated 27 September 2022 ("**intervention application**").
- 4 The founding affidavit contains legal argument and irrelevant allegations. I consequently do not address all of the averments in the founding affidavit, and to the extent that any allegations are not addressed, they should be taken as denied.
- 5 The HSF objects to the intervention application on two main grounds -
 - 5.1 First, the Truck Drivers Forum has failed to satisfy the direct and substantial interest test warranting its joinder to the main proceedings; and

5.2 Second, even if it were found that the Truck Drivers Forum has some direct and substantial interest (which is denied), that is not sufficient for joinder in a constitutional matter of this nature. The Truck Drivers Forum is required to show further that their intervention is in the interests of justice.

6 Before addressing these issues, I briefly address the Truck Drivers Forum's dilatory conduct.

THE TRUCK DRIVERS FORUM'S DILATORY CONDUCT

7 On 5 October 2022, this Court made an order that the Truck Drivers Forum file its supplementary affidavit (if any) by 13 October 2022.¹

8 On 27 October 2022, HSF's legal representatives wrote to the attorneys representing the Truck Drivers Forum, pointing out that they were late in filing a supplementary affidavit and requesting confirmation whether their client intends filing a supplementary affidavit before HSF files its answering affidavit. This communication was followed by numerous phones calls.

9 In a telephone discussion with the HSF's attorneys, the attorneys for the Truck Drivers Forum undertook to revert to HSF's email of 27 October 2022 by no later than 16h00 on Monday 31 October 2022.

¹ Court order: p 0-13 para 1.2.

- 10 On 1 November 2022, the HSF's attorneys wrote again to the Truck Drivers Forum's attorneys pointing out that they had failed to reply to the email of 27 October, despite their undertaking. Again, the attorneys were requested to urgently advise if their client intended filing the supplementary affidavit so that HSF can respond.
- 11 The next day, on 2 November 2022, the HSF and the Truck Drivers Forum's attorneys had telephone discussions wherein the attorneys for the Truck Drivers Forum undertook to revert within 30 minutes. This was confirmed in an email dated 2 November 2022 addressed to the attorneys for the Truck Drivers Forum. This email also pointed out the delay caused by the Truck Drivers Forum.
- 12 Copies of the email correspondence from the HSF's attorneys are attached as annexure "AA1". I also attach a confirmatory affidavit from Chigo Mabila, an attorney from DLA Piper South Africa (RF) Incorporated who was responsible for the aforesaid engagements with the attorneys for the Truck Drivers Forum.
- 13 On 2 November 2022, the Truck Drivers Forum wrote to the HSF's attorneys; committing to delivering their client's supplementary affidavit by 8 November 2022, that is nearly a month later than this Court ordered. A copy of an email from The Truck Drivers Forum's attorneys is attached as annexure "AA2".

- 14 The Truck Drivers Forum failed to meet their self-imposed deadline and, to date, have failed to deliver any supplementary papers. Further, no consent has been sought or provided for any late filing of the Truck Drivers Forum's supplementary affidavit.
- 15 While the HSF did not consent to the late filing of any supplementary affidavit, the HSF did not wish to file an answering affidavit in advance of the threatened supplementary affidavit, as doing so would have led to a duplication of answering affidavits and further wasted costs.
- 16 The Truck Drivers Forum has not respected the timelines ordered by the Court and their lack of adherence, in a matter that has already been delayed, further prejudices the adjudication of this matter as well as the livelihoods of ZEP holders.

NO DIRECT AND SUBSTANTIAL INTEREST IN THE SUBJECT MATTER

- 17 It is well settled that an applicant for intervention must meet the direct and substantial interest test in order to succeed. This means that the Truck Drivers Forum is required to show that it has a right adversely affected or likely to be affected by the order sought by the HSF. The Truck Drivers Forum has failed to meet this test.
- 18 First, the Truck Drivers Forum's stated interest in this matter is its desire to prevent, "*illegal and undocumented truck drivers from being employed in the Republic*". Mr Khumalo records the Truck Drivers Forum's mission and

vision as aiming “to make sure that no undocumented workers are involved in the trucking industry”². But ZEP-holders are neither “illegal” nor are they “undocumented”. They have lived and worked in South Africa lawfully for more than 13 years. The premise of the Truck Drivers Forum’s alleged interest in the matter is flawed.

19 Second, the Truck Drivers Forum seeks to argue that the entire exemption regime, the ZEPs and their predecessors are unlawful from the beginning and should have never been granted at all.³ This is completely different to the challenge brought by and the relief sought by the HSF and CORMSA and falls beyond the scope of this application.

20 Third, no relief is sought in the Truck Drivers Forum’s notice of motion to review and set aside the decision of the Minister to establish the exemption regime.

20.1 Absent a properly formulated review application, the Truck Drivers Forum is precluded from asserting the invalidity of the ZEP programme and other exemption regimes.

20.2 Until an administrative act is declared invalid and set aside, it exists in fact and it must be treated as valid, and cannot be ignored.

² Founding Affidavit deposed to by Mario Khumalo on behalf of the All Truck Drivers Forum and Allies South Africa on 27 September 2022 (FA intervention application) p 026-7 para 6.

³ FA (intervention application) p 026-8 para 7.

20.3 In any event, it is still open to the Truck Drivers Forum to bring its own stand-alone review application challenging the existence of the exemption regime, although that application is likely long out of time.

21 Fourth, the review relief sought in the HSF application could hardly be to the prejudice of the Truck Drivers Forum's interests. If the decision is remitted to the Minister for reconsideration, following a fair process, the Truck Drivers Forum would have ample opportunity to air their views on the validity of special exemption regimes during the reconsideration process.

22 In the circumstances, the allegations made in the founding affidavit do not justify admitting the Truck Drivers Forum as a party in the HSF application.

IT IS, IN ANY EVENT, NOT IN THE INTEREST OF JUSTICE TO ADMIT THE TRUCK DRIVERS FORUM AS A RESPONDENT IN THE HSF APPLICATION

23 Even if the Truck Drivers Forum had some direct and substantial interest in the main matter (which is denied), I am advised that that is not sufficient for joinder in a constitutional matter of this nature. More is required from the Truck Drivers Forum - it must show further that intervention is in the interest of justice.

24 The Truck Drivers Forum fails to satisfy this interest of justice test.

25 First, no explanation has been offered for the delay in launching this joinder application. In the HSF application, the pleadings have closed and

- heads of arguments have been filed by all parties. The Truck Drivers Forum's intervention application was only brought six days before 5 October 2022, the date which was initially allocated for the hearing of the HSF application.
- 26 Second, the papers offer no explanation (or a prayer for condonation) as to why the Truck Drivers Forum waited until the eleventh hour before filing their intervention application. This is despite the attorneys of record having had access to Caselines papers from as early as 27 June 2022, as reflected in the log of participants on Caselines. An extract of the Caselines access audit is attached as annexure "AA3".
- 27 Third, the Truck Drivers Forum's application raises a completely different issue to the issues that are before the Court. Nothing in the joinder application is useful to assist the Court to determine the merits of the HSF and CoRMSA applications.
- 28 Fourth, the points advanced by the Truck Drivers Forum constitute a separate cause of action which requires a separate review application - that being, *prima facie*, out of the 180-days means this court has no jurisdiction to entertain the contentions advanced by the Truck Drivers Forum without a formal application for condonation.
- 29 Fifth, joining the Truck Drivers Forum as party in the HSF application will require the Truck Drivers Forum to file supplemented papers – this was

confirmed by their counsel in the case management meeting held on 3 October 2022 and a court order was made to accommodate the supplementing of papers by the Truck Drivers Forum. Despite this, they have to date failed to supplement their paper.

RESPONSES TO INDIVIDUAL PARAGRAPHS IN THE FOUNDING AFFIDAVIT

30 I now turn to address individual allegations in the founding affidavit to the extent necessary. I do not intend to address all of the allegations, most of which are legal disputes which will be addressed in argument. Any allegation which is not addressed and which is inconsistent with what is stated above must be taken to be denied.

Ad paragraphs 2 - 3

31 Save to deny that the affidavit is true and correct, the content of these paragraphs is noted.

Ad paragraph 6

32 I note that the Truck Drivers Forum "aims to make sure that no undocumented workers are involved in the trucking industry".

33 This application does not concern undocumented foreign nationals. ZEP-holders are documented and fall outside of the purview of the Truck Drivers Forum. The ZEP holders are not individuals with whom the Truck

Drivers Forum should be concerned and accordingly they have no substantial interest in the outcome of litigation based on documented foreign nationals' rights.

Ad paragraphs 7 – 8

34 I note that the Truck Drivers Forum's view that the entire exemption regime is unlawful. The HSF denies these legal conclusions, which will be addressed in argument.

35 The Truck Drivers Forum fails to provide any evidence that the exemption programmes somehow contributed to illegal and undocumented truck drivers. This contention is untenable and without any basis.

36 Moreover, the HSF does not contend, as the Truck Drivers Forum argues, that the ZEPs be continued indefinitely. All that is demanded is that the Minister must make a decision in a lawful, rational and fair manner that is compatible with constitutional rights.

37 In any event, it would be prejudicial to join a party who seeks to introduce a new (and unrelated) dispute in a matter which is ripe for hearing

Ad paragraph 9 (including subparagraphs)

38 As already stated, the ZEP-holders are documented, accordingly there is no logical and legal basis to assert – as the Truck Drivers Forum has

attempted to argue – that ZEPs “*contribute to the proliferation of illegal, undocumented drivers in the trucking industry in the Republic*”.⁴ These submissions add no value to the debate before this Court.

Ad paragraph 10

39 The mere fact that the Truck Drivers Forum wishes to oppose the order sought by the HSF does not entail that it has a direct and substantial interest in the relief sought.

40 The Truck Drivers Forum is challenging the issuance of ZEPs whereas the HSF is challenging the termination and non-renewal of ZEPs. These are two separate challenges, and the Truck Drivers Forum should bring its own review application if it wishes to advance its contentions.

Ad paragraph 13

41 I note the Truck Drivers Forum's stated aim to “*make only citizens to get jobs, own businesses and properties*”. This aim is antithetical to basic constitutional rights and values and our immigration laws, which confer rights to work, own businesses and properties on categories of foreign nationals lawfully residing within the country.

Ad paragraphs 14 – 15

⁴ FA (intervention application) p 026-8 para 9.1

42 The contents of these paragraphs are noted.

AD ATDFASA STAKEHOLDER INVOLVEMENT

Ad paragraph 17 – 37

43 HSF sympathises with the foreign nationals facing xenophobic attacks in the trucking industry. The Truck Drivers Forum's makes unsubstantiated allegations about foreign nationals stealing jobs - there is neither evidence for this proposition nor any suggestion that ZEP-holders contribute to the employment of undocumented foreign nationals.

44 In paragraph 26, it is alleged that "the fact that no other permit is required for the holders of ZEPs to be employed as truck drivers fortified the submission by the Truck Drivers Form that those ZEPS were unlawfully in the first place as truck driving does not fall under critical or specialised list of skills".⁵

44.1 The ZEP is an exemption permit. By its very nature, it is designed to exempt its holders from complying with the requirements of *inter alia* having a work permits before getting employment in South Africa, as set out in the Immigration Act.

44.2 The fact that ZEP holders do not require work permits or critical skills visas does not make it unlawful – this is why exemptions are available in the first place.

⁵ FA (intervention application) p 026-14 para 26

45 The remainder of these paragraphs are concerned with illegal and undocumented foreign nationals in the trucking industry. These paragraphs are irrelevant in these proceedings, and I will accordingly not respond to them.

AD THE LEGISLATIVE FRAMEWORK

Ad paragraph 40– 45

46 To the extent that these paragraphs accurately record what is stated in the legislation referred to therein, the content of these paragraphs is noted.

AD THE ZIMBABWEANS SPECIAL DISPENSATION

Ad paragraph 47 - 51

47 These paragraphs are an amplification of paragraphs 9.1 and 9.2 of the founding affidavit. As stated above, this is a separate challenge which necessitates a separate review application. I further deny the allegations that the exemption programmes are unlawful.

AD GROUNDS UPON WHICH THE EXEMPTION PERMITS ARE CHALLENGED

Ad paragraph 52 – 53 and 54

48 The allegations made in these paragraphs are without merit.

Ad paragraph 56 - 72

49 As stated above, these allegations are distinct from the challenge brought by the HSF and should be adjudicated in a separate application. The relief sought by HSF and the Truck Drivers Forum yields different outcomes which further justifies the HSF's position that the intervention application is a separate application which should not be joined to the HSF application.

50 In any event, I deny the legal conclusions drawn in these paragraphs, which are a matter for argument.

Ad paragraph 73

51 It is incorrect to allege that ZEPs have not produced any positive effects for the South Africa economy. The 2017 White Paper on Immigration stated that special dispensations, such as the ZEP, contribute to economic growth.⁶

Ad paragraph 74 – 76

52 No evidence is provided for these bald allegations that foreign nationals contribute to unemployment and scarcity of resources. Similar allegations have been addressed in the HSF's founding affidavit and I request that these responses be read as incorporated herein.⁷

⁶ Annexure "FA 6" to the HSF Founding Affidavit p 001-95 para 56.

⁷ HSF Founding Affidavit p 001 – 71-72 para 149

AD CONCLUSION***Ad paragraph 82***


53 The HSF therefore opposes the application by the Truck Drivers Forum to be admitted as a respondent in the HSF application.

WHEREFORE THE HSF PRAYS THAT THE APPLICATION BE DISMISSED WITH COSTS



 NICOLE FRITZ

SIGNED and SWORN to before me at Johannesburg on this the 16th day of November .2022, by the deponent who has acknowledged that she knows and understands the contents of this affidavit; that she has no objection to taking to the prescribed oath and that she considers the prescribed oath to be binding on her conscience.



 COMMISSIONER OF OATHS
 Full Names:
 Business Address:
 Area:
 Designation:

PHELISA PHELOKAZI JWAJWA
 8 Sherborne Road
 Parktown
 Johannesburg
 Commissioner Of Oaths
 Ex Officio Practising Attorney R.S.A

Chigo Mabila

From: Waseeqah Makadam
Sent: Thursday, October 27, 2022 4:06 PM
To: mattorneys@telkomsa.net
Cc: Manyaku Thulare; Chigo Mabila
Subject: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022 [DLAP-UKMATTERS.FID5965704]

Importance: High

Dear Sirs

We refer to the above matter and your client's application to intervene, dated 27 September 2022.

We also refer to the court order, dated 5 October 2022.

In terms of paragraph 1.2 of the court order, your client was to file their supplementary affidavit by 13 October 2022. Our client is then to file its answering affidavit in response by 31 October 2022. However, to date, we have not received any supplementary papers from your client.

Please can you let us know whether your client intends filing a supplementary affidavit, and if so, by when? Our client intends filing an answering affidavit in response to your client's application, however, we need to know if we should expect a supplementary affidavit first.

We await your response.

Regards

Waseeqah Makadam
Director

T: +27113020807
F: +27113020801
waseeqah.makadam@dlapiper.com

DLA Piper South Africa (RF) Incorporated
www.dlapiper.com



Chigo Mabila

From: Chigo Mabila
Sent: Tuesday, November 1, 2022 12:52 PM
To: mattorneys@telkomsa.net
Cc: Waseeqah Makadam; Manyaku Thulare
Subject: RE: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022 [DLAP-UKMATTERS.FID5965704]

Dear Joshua Mashao

We refer to our email below as well as our numerous phone calls of yesterday, as well as your undertaking to provide us with a written response to our email below by no later than 16h00 yesterday.

As mentioned in our email below, read with the court order dated 5 October 2022, our client intends filing an answering affidavit in response to your client's application but we urgently need to know if and when your client will be filing its supplementary affidavit so that we can respond thereto *in toto*.

We await your urgent reply.

Our client's rights remain strictly reserved.

Kind regards

Chigo Mabila
Associate

M: +27661849187
chigo.mabila@dlapiper.com

DLA Piper Advisory Services Proprietary Limited

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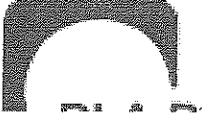
We await your response.

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Director

T: +27113020807
F: +27113020801
waseeqah.makadam@dlapiper.com

DLA Piper South Africa (RF) Incorporated
www.dlapiper.com



Handwritten signature NLF

Chigo Mabila

From: Chigo Mabila
Sent: Wednesday, November 2, 2022 10:15 AM
To: mattorneys@telkomsa.net
Cc: Waseeqah Makadam; Manyaku Thulare
Subject: RE: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022

Dear Joshua Masha

Further to our telephonic discussion this morning, we look forward to receiving your correspondence regarding your client's supplementary affidavit within the next 30 minutes.

We place on record that our client has not agreed to your client's non-compliance with the court order dated 5 October 2022.

The delivery of our client's answering affidavit is being hampered by your client's dilatory conduct in relation to its supplementary affidavit. We require urgent resolution to this issue.

Kind regards

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Associate

M: +27661849187
chigo.mabila@dlapiper.com

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Our client's rights remain strictly reserved.

Kind regards

Chigo Mabila
Associate

M: +27661849187
chigo.mabila@dlapiper.com

Chigo Mabila

From: mattorneys@telkomsa.net
Sent: Wednesday, November 2, 2022 10:40 AM
To: Chigo Mabila
Subject: FW: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022

****EXTERNAL****

Good morning

As telephonically put to you, we will file our supplementary affidavit by Tuesday the 8 November 2022.

Thanks

MJ Mashao

From: Chigo Mabila <Chigo.Mabila@dlapiper.com>
Sent: Wednesday, 02 November 2022 10:15
To: mattorneys@telkomsa.net
Cc: Waseeqah Makadam <Waseeqah.Makadam@dlapiper.com>; Manyaku Thulare <Manyaku.Thulare@dlapiper.com>
Subject: RE: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022

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Kind regards

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Subject: RE: Helen Suzman Foundation / Minister of Home Affairs & Another, Case No. 32323/2022 [DLAP-UKMATTERS.FID5965704]

Dear Joshua Mashao

"AA3"

Miss Thando Ndita	First Accessed	Candidate Attorney	26 July 2022 10:20 AM	Miss Manyaku Thulare	Master Bundle
Mr Jason Whyte	First Accessed	Attorney	26 July 2022 09:08 AM	Ms Anneline Coetsee	Master Bundle
Mr Jason Whyte	Invited	Attorney	26 July 2022 09:05 AM	Ms Anneline Coetsee	Master Bundle
Ms Anneline Coetsee	First Accessed	Candidate Attorney	26 July 2022 09:04 AM	Miss Manyaku Thulare	Master Bundle
Miss Thando Ndita	Invited	Candidate Attorney	25 July 2022 12:31 PM	Miss Manyaku Thulare	Master Bundle
Ms Anneline Coetsee	Invited	Candidate Attorney	25 July 2022 12:30 PM	Miss Manyaku Thulare	Master Bundle
Mr Steven Budender	First Accessed	Advocate	24 July 2022 10:00 PM	Miss Manyaku Thulare	Master Bundle
Ms Maitsho Mhuvaduba	Invited	Candidate Attorney	23 July 2022 04:32 PM	Miss Manyaku Thulare	Master Bundle
Adv Mshahida Adhikari	First Accessed	Advocate	19 July 2022 08:39 AM	Miss MUDZULI RAKWAMBO	Master Bundle
Mr Sean Rosenberg	Invited	Advocate	13 July 2022 04:18 PM	Miss MUDZULI RAKWAMBO	Master Bundle
Adv Mshahida Adhikari	Invited	Advocate	13 July 2022 04:17 PM	Miss MUDZULI RAKWAMBO	Master Bundle
Adv Imait Jamie	Invited	Advocate	13 July 2022 04:16 PM	Miss MUDZULI RAKWAMBO	Master Bundle
Mr Chris McConnachie	First Accessed	Advocate	28 June 2022 05:43 PM	Miss Manyaku Thulare	Master Bundle
Mr Ziphozile Raqwa	First Accessed	Advocate	28 June 2022 05:43 PM	Miss Manyaku Thulare	Master Bundle
Mr Neilvan Onselan	First Accessed	Attorney	28 June 2022 12:18 PM	Mr. Tumelo Molokomme	Master Bundle
Adv Marius Snyman	First Accessed	Advocate	27 June 2022 06:40 PM	Mr Joshua Mpanana Mashao	Master Bundle
Adv Marius Snyman	Invited	Advocate	27 June 2022 03:31 PM	Mr Joshua Mpanana Mashao	Master Bundle
Adv Muvamba Karabo Munene	First Accessed	Attorney	27 June 2022 01:32 PM	Adv Muvamba Karabo Munene	Master Bundle
Adv Muvamba Karabo Munene	Invited	Attorney	27 June 2022 01:00 PM	Adv Muvamba Karabo Munene	Master Bundle
Adv Steven Budender	First Accessed	Registrar	22 June 2022 12:29 PM	Mr. Tumelo Molokomme	Master Bundle
Mr Chris McConnachie	Invited	Advocate	22 June 2022 04:22 PM	Miss Manyaku Thulare	Master Bundle
Mr Ziphozile Raqwa	Invited	Advocate	22 June 2022 04:20 PM	Miss Manyaku Thulare	Master Bundle
ncole@hst.org.za	Invited	Applicant	22 June 2022 04:20 PM	Miss Manyaku Thulare	Master Bundle
Mr Jonathan Keus	First Accessed	Attorney	22 June 2022 11:59 AM	Miss Manyaku Thulare	Master Bundle
Miss Manyaku Thulare	First Accessed	Candidate Attorney	21 June 2022 04:23 PM	Mr. Tumelo Molokomme	Master Bundle
Miss MUDZULI RAKWAMBO	First Accessed	Attorney	20 June 2022 05:44 PM	Mr. Tumelo Molokomme	Master Bundle
Mr Khethani Swibana	First Accessed	Attorney	20 June 2022 05:35 PM	Mr. Tumelo Molokomme	Master Bundle
Ms Waseeqah Hatadani	First Accessed	Attorney	20 June 2022 05:33 PM	Mr. Tumelo Molokomme	Master Bundle
Miss Manyaku Thulare	Invited	Candidate Attorney	20 June 2022 04:58 PM	Mr. Tumelo Molokomme	Master Bundle
Mr Neilvan On	Invited	Attorney	20 June 2022 04:58 PM	Mr. Tumelo Molokomme	Master Bundle