

IN THE HIGH COURT OF SOUTH AFRICA  
GAUTENG DIVISION, PRETORIA

Case No: 39724/19

In the matter between:

**THE TRUSTEES FOR THE TIME BEING OF  
GROUNDWORKTRUST** First Applicant

**VUKANI ENVIRONMENTAL JUSTICE  
MOVEMENT IN ACTION** Second Applicant

and

**THE MINISTER OF ENVIRONMENTAL AFFAIRS** First Respondent

**NATIONAL AIR QUALITY OFFICER** Second Respondent

**PRESIDENT OF THE REPUBLIC OF  
SOUTH AFRICA** Third Respondent

**MEMBER OF THE EXECUTIVE COUNCIL  
FOR AGRICULTURE AND RURAL DEVELOPMENT,  
GAUTENG PROVINCE** Fourth Respondent

**MEMBER OF THE EXECUTIVE COUNCIL  
FOR AGRICULTURE, RURAL DEVELOPMENT, LAND  
AND ENVIRONMENTAL AFFAIRS,  
MPUMALANGA PROVINCE** Fifth Respondent

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**CONFIRMATORY AFFIDAVIT**

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I, the undersigned,

**TIMOTHY HENDRIE LLOYD**

MB  
THL

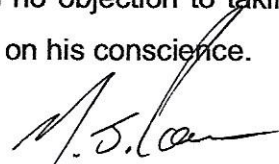
do hereby make oath and state:

1. I am an adult male and admitted attorney practising at the Centre for Environmental Rights ("CER"), a non-profit organisation and law clinic registered with the Legal Practice Council. I am based at CER's Johannesburg office currently located in the DJ du Plessis Building, West Campus, University of the Witwatersrand, Braamfontein, 2001.
2. The facts contained in this affidavit fall within my personal knowledge, except where the context indicates otherwise, and are true.
3. I have read the supplementary founding affidavit deposed to by **SVEN EATON PATRICK PEEK** and confirm that its contents are true and correct insofar as they pertain to me and the CER. In particular, I confirm the content in paragraphs 12, 16, and 87.3 of the supplementary founding affidavit.



**TIMOTHY HENDRIE LLOYD**

Thus signed and sworn to before me at Johannesburg on this 12<sup>th</sup> day of July 2020 by the deponent who has acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that the prescribed oath is binding on his conscience.



**COMMISSIONER OF OATHS**

NAME:

CAPACITY:

ADDRESS:

AREA:

**MICHAEL JAN POWER**  
**COMMISSIONER OF OATHS**  
 Practising Attorney: Power & Co. Inc.  
 Firm No. F18433 | Member No. 3/241  
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