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In the matter between:

CL-015 291 1619

THE HERD NATURE RESERVE, NPC

First Applicant

LIVING LIMPOPO, NPC

Second
Applicant

CENTRE FOR APPLIED LEGAL STUDIES

Third Applicant

and

THE LIMPOPO ECONOMIC DEVELOPMENT AGENCY

First Respondent

**MEC OF ECONOMIC DEVELOPMENT, ENVIRONMENT
AND TOURISM, LIMPOPO**

Second
Respondent

CHIEF DIRECTOR: ENVIRONMENTAL TRADE AND PROTECTION, DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM

MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT 2022-12-15 Fourth Respondent

MUSINA-MAKHADO SPECIAL ECONOMIC ZONE STATE
OWNED COMPANY


NOTICE IN TERMS OF RULE 16 A

TAKE NOTICE THAT in this application, in terms of Rule 53 of the Uniform Rules of Court, the Applicants have raised the following constitutional issue, namely:

Whether, in light of the climate crisis and South Africa's global commitments, and whether in light of the First Respondent's expert's concerns regarding biodiversity, water security and energy provision, the MEC's decision to refuse the Third

Applicant's appeal on 8 July 2022 of the Environmental Authorisation granted to the First Respondent is contrary to the spirit and purport of section 24(a) right to an environment that is not harmful to health and well-being, as enshrined in the Constitution of the Republic of South Africa, 1996.

DATED AT POLOKWANE on this day of December 2022


APPLICANTS' ATTORNEYS

ALL RISE ATTORNEYS

Applicants' Attorneys

c/o **BECKER ATTORNEYS**

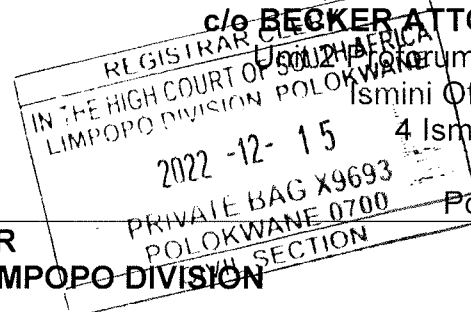
Uphold Forum Building

Ismeni Office Park

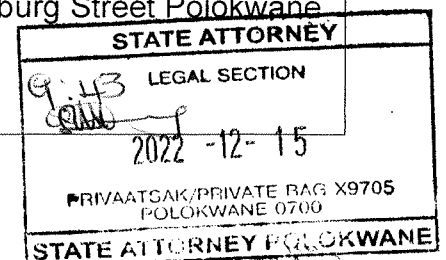
4 Ismini Street

Bendor

Polokwane



TO	:	THE REGISTRAR HIGH COURT LIMPOPO DIVISION Polokwane Limpopo
AND TO	:	LIMPOPO ECONOMIC DEVELOPMENT AGENCY First Respondent Enterprise Development House Main Road Lebowakgomo Limpopo Province
AND TO	:	MEC OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM, LIMPOPO Second Respondent Evridiki Towers, 20 Hans Van Rensburg Street Polokwane % the State Attorney Second Floor, High Court Building 36 Biccard Street



		Polokwane Limpopo Province
AND TO	:	CHIEF DIRECTOR: ENVIRONMENTAL TRADE AND PROTECTION, DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM, LIMPOPO Third Respondent Mowaneng Building 40 Hans van Rensburg Street Polokwane Limpopo Province
AND TO	:	MINISTER OF FORESTRY, FISHERIES AND THE ENVIRONMENT Fourth Respondent Environment House, 473 Steve Biko Street Arcadia, Pretoria % the State Attorney Ground Floor SALU Building 316 Thabo Sehume Street Pretoria
AND TO	:	MUSINA-MAKHADO SPECIAL ECONOMIC ZONE SOC Fifth Respondent Enterprise Development House Main Road, Lebowakgomo Limpopo Province