

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

CASE NO: 32097/2020

In the matter between:

ORGANISATION UNDOING TAX ABUSE

Applicant

and

MINISTER OF TRANSPORT

1ST Respondent

**MINISTER OF CO-OPERATIVE GOVERNANCE
AND TRADITIONAL AFFAIRS**

2ND Respondent

ROAD TRAFFIC INFRINGEMENT AUTHORITY

3RD Respondent

APPEALS TRIBUNAL

4TH Respondent

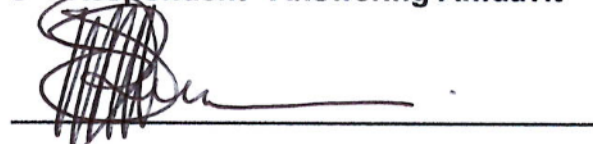
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3RD Respondent "Answering Affidavit "



**ATTORNEYS For 3rd RESPONDENT
SELEKA ATTORNEYS INCORPORATED**

306 Bram Fischer Towers
20 Albert Street
JOHANNESBURG
PO BOX 61432
MARSHALLTOWN
2107
Tel: 011 036 5655
Email: info@selekattorneys.co.za
Ref: SLK 049/20

TO: THE REGISTRAR OF THE HIGH COURT
GAUTENG DIVISION, PRETORIA

AND TO: ATTORNEYS FOR THE APPLICANT
JENNINGS INCORPORATED
149 ANDERSON STREET
BROOKLYN
PRETORIA
TEL: 012 110 4442
EMAIL: ANDRI@JINC.CO.ZA
REF: A JENNINGS/OUT002

AND TO: ATTORNEYS FOR 1ST RESPONDENT
STATE ATTORNEY(PRETORIA)
SALU BUILDING
316 THABO SEHUME STREET
CNR THABO SEHUME (ANDRIES) AND
FRANCIS BAARD (SCHOEMAN STREET)
PRIVATE BAG X91
PRETORIA ,0001
REF: 2562/2020/Z22
TEL: 012 309 1578
FAX: 012 039 1649/50
EMAIL: nagongqo@justice.gov.za
MS N A QONGQO.

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

CASE NO: 32097/2020

In the matter between:

ORGANISATION UNDOING TAX ABUSE

Applicant

and

MINISTER OF TRANSPORT

First Respondent

**MINISTER OF CO-OPERATIVE GOVERNANCE
AND TRADITIONAL AFFAIRS**

Second Respondent

ROAD TRAFFIC INFRINGEMENT AUTHORITY

Third Respondent

APPEALS TRIBUNAL

Fourth Respondent

THIRD RESPONDENT'S ANSWERING AFFIDAVIT

I, the undersigned;

JAPHTA CHUWE;

do, hereby make oath and state as follows:



1. I am an adult male person appointed as the Registrar of the **Road Traffic Infringement Agency ("RTIA")**, hereby cited as the Third Respondent, situated at **Waterfall Edge B, 253 Howick Close, Waterfall Office Park, Bekker Road, Midrand, Gauteng Province**. I depose to this affidavit in my capacity as the accounting officer of the Third Respondent.
2. I am duly authorised to depose to this affidavit on behalf of the Third Respondent. Unless otherwise stated or the converse appears from the context, the facts herein contained are within my own personal knowledge and belief and are both true and correct.
3. Where I make legal submissions, I do so on the basis of the legal advice received from the Third Respondent's legal representatives, which I verily believe to be correct.
4. The **RTIA** has been cited as the Third Respondent in this Application and is also opposing the Application on the same grounds set out by the Minister of Transport in his answering affidavit. In amplification thereof, **RTIA** sets out further grounds why this application is ill-conceived and meritless. For the reasons set out below, and those set out in the Minister's answering affidavit, this application should be dismissed.

5. I have read the Notice of Motion and founding affidavit deposed to by **Stephanie Fick** on behalf of the Applicant. As I have pointed above, this Application is misconceived and lacks merit.
6. In this Application, the Applicant wants to have the **Administrative Adjudication of Road Traffic Offences Act 46 of 1998 ("AARTO Act")** and the **Administrative Adjudication of Road Traffic Offences Amendment Act 4 of 2019 ("Amendment Act")** declared unconstitutional and invalid. In the alternative, the applicant wants the court to declare **Section 17 of the Amendment Act** unconstitutional and invalid.
7. According to the Applicant, the **AARTO Act** and the Amendment Act unlawfully intrude upon the exclusive legislative competence of provinces as set out in Schedule 5, Part A and Part B of the Constitution of the Republic of South Africa ("The Constitution"), to legislate in relation to provincial roads and traffic and in relation to roads, traffic and parking at local government level.
8. The Applicant contends that the **AARTO Act** and the Amendment Act moves away from a default system of judicial enforcement of traffic laws through criminal law to a compulsory system of administrative enforcement of traffic laws, through administrative tribunals, administrative fines and a demerit points system.



9. Apart from the “offences” determined by the Minister, all contraventions of road traffic and transport laws will be treated as infringements which are subject exclusively to administrative enforcement under the Amendment Act by two national organs of state, the Road Traffic Infringement Authority (Third Respondent) established by Section 3, and the Appeals Tribunal (the Fourth Respondent) established by Section 29A of the Amendment Act.
10. The Applicant further argues that in terms of Section 156(1)(a) of the Constitution, a municipality has exclusive authority in respect of the local government matters listed in Part B of Schedule 4, and Part B of Schedule 5. These matters include “traffic and parking”. Therefore, the enforcement of traffic and parking laws must take place at a local government level and shall not be usurped by national organs of state in the manner that the Act and the Amendment Act purport to do.
11. The Applicant states that should the court finds that the principal Act is not unconstitutional, then it seeks in the alternative, that Section 17 of the Amendment Act be declared unconstitutional and invalid. According to the Applicant, Section 17 of the Amendment Act has introduced inadequate service provisions. What the Applicant argues is that, Section 17 of the Amendment Act has removed the safeguard requirement of personal service or registered mail, embodied in Section 30 of the principal Act. According to the Applicant, Section

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17 of the Amendment Act replaces this adequate form of service in the principal Act with "postage" or "electronic service".

12. According to the Applicant, the service on infringers electronically through email, SMS or voice message is unconstitutional given the serious consequences that may follow as a result of the demerit points system introduced by the Amendment Act, which may result in the alleged infringer's driving licence suspended, cancelled or precluded from obtaining renewal of vehicle's licence. The argument is that it cannot be guaranteed that the alleged infringer has received the email, SMS or voice message. In respect of "postage", it is alleged that postage exclude registered mail, therefore ordinary postage does not guarantee that the alleged infringer has received the notification of infringement.

13. None of these contentions advanced by the Applicant have merit. In so far as the constitutional attack of the principal Act, it is clear from the reading of the founding affidavit that the attack is half-hearted, and not seriously mounted. This is because there is no cogent reason advanced for such attack. The real complaint in essence is the service provision amended by Section 17 of the Amendment Act. The Applicant is happy with the service provision in the principal Act and want same to be retained. The constitutional attack of the principal Act on the basis of separation of powers and autonomy of local government is misplaced, as it arises from a misinterpretation of the constitution. This attack will be dealt with on a proper interpretation of the constitution and the principal Act.

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14. With regard to the service provisions in Section 17 of the Amendment Act, the Applicant has conveniently elected to state that Section 17 of the Amendment Act has retained personal service, and departed from registered mail, by introducing further modes of service. Neither personal nor registered mail have been abrogated by Section 17 of the Amendment Act. Electronic service is introduced in order to expand on modes of service. If the infringer chooses to be notified electronically, it is not open for the Applicant to decide for the alleged infringer.
15. What has become evident is that whilst the Applicant has been in the past permitted by the courts to launch Applications in the public interest, this is one Application which does not meet that test. I therefore dispute that the Applicant has in this Application demonstrated the requisite standing to challenge the service provisions on behalf of all motorists in the country, and to choose for motorists which mode of service is best for them. Legal argument will be advanced during the hearing of the application.


BACKGROUND

16. RTIA ("the Authority") is established in terms of the Section 3 of the Act. It is a juristic person accountable to the Minister of Transport. The objects of the Authority are to administer a procedure to discourage the contravention of road traffic or transport legislation and to support the adjudication of infringements, to



enforce penalties imposed against persons contravening road traffic laws as set out in the Act, to provide specialised prosecution support services as, to administer, manage and enforce a points demerit system for infringements and offences and to undertake community education and community awareness programmes in order to ensure that individuals understand their rights and options.

17. The control of the Authority is vested in the Road Traffic Infringement Authority Board ("the Board") which comprises of five persons appointed by the Minister and who by virtue of their relevant experience and technical expertise are suitably qualified to perform the functions of the Authority under this Act, a Director of Public Prosecutions, nominated by the National Director of Public Prosecutions in consultation with the Minister and the Registrar ("the Registrar") of the Authority.
18. A person with qualifications and experience determined by the Minister by notice in the Government Gazette is appointed by the Board as Registrar of the Authority.
19. The functions of the Authority are undertaken in accordance with the business plan prepared by the Registrar and approved by the Board. These functions are undertaken by a complement of no more than twenty-five Deputy Registrars and the number of representation officers as approved by the board.



20. A person alleged to have committed an infringement is served with an infringement notice that *inter alia* specifies:

- “(1) The name, residential and postal address of the infringer, if known, at the time when the infringement was committed.
- (2) The prescribed particulars of the infringement.
- (3) The amount of the prescribed penalty payable.
- (4) The issuing authority to which the penalty is payable.
- (5) The prescribed discount which may be obtained if the penalty is paid not later than 32 days after the date of service of the infringement notice.
- (6) The demerit points position that may be ascertained from the National Contraventions Register at the office of any issuing authority, registering authority or driving licence testing centre.
- (7) The demerit points position which may be ascertained in the prescribed manner; and
- (8) That the infringer may elect to make representations to the agency.”

APPLICABLE LEGAL FRAMEWORK.

21. When exercising its legislative authority, Parliament is bound only by the Constitution, and must act in accordance with, and within the limits of, the Constitution.

22. Section 44(1) of the Constitution sets out the National legislative authority as vested in Parliament-

"(a) confers on the National Assembly the power: -

- (i) to amend the Constitution;*
- (ii) to pass legislation with regard to **any** [own emphasis] matter, including a matter within a functional area listed in Schedule 4, but excluding, subject to subsection (2), a matter within a functional area listed in Schedule 5; and*
- (iii) ...*

(b) confers on the National Council of Provinces the power: -

- (i) ...*
- (ii) to pass, in accordance with section 76, legislation with regard to **any** [own emphasis] matter within a functional area listed in **Schedule 4** and any other matter required by the Constitution to be passed in accordance with section 76; and*
- (iii) ..."*

23. Section 44(2) further states that:

"Parliament may intervene, by passing legislation in accordance with section 76(1), with regard to a matter falling within a functional area listed in Schedule 5, when it is necessary: -

- (a) to maintain national security;*
- (b) to maintain economic unity;*
- (c) to maintain essential national standards;*
- (d) to establish minimum standards required for the rendering of services;*
- or*
- (e) to prevent unreasonable action taken by a province which is prejudicial to the interests of another province or to the country as a whole."*

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24. According to Section 76(1) of the Constitution, when the National Assembly passes a Bill referred to in Subsection (3), (4) or (5), the Bill must be referred to the National Council of Provinces ("the NCOP") and it is dealt with in accordance with the following procedure: The NCOP must: (i) pass the Bill (ii) pass an amended Bill or (iii) reject the Bill.
25. In terms of Section 76(3) a Bill must be dealt with in accordance with the procedure established by either Subsection (1) or Subsection (2), if it falls within a functional area listed in Schedule 4, that is, it must be referred to the NCOP for the NCOP to pass the bill, pass an amended bill or reject the bill.
26. In terms of Section 44(3) of the Constitution, the legislation with regard to a matter that is reasonably necessary for, or incidental to, the effective exercise of a power concerning any matter listed in Schedule 4 is, for all purposes, legislation with regard to a matter listed in Schedule 4.
27. Schedule 4 sets out the functional areas of concurrent National and Provincial Legislative competence under Parts A and Part B. Road traffic regulation is listed in Part A as an area where National and Provincial Legislature share concurrent competence.
28. Schedule 5, Part A, sets out the functional areas of exclusive Provincial Legislative competence while Part B of Schedule 5 sets out matters reserved for



local government. Provincial roads and traffic are among the competencies exclusively reserved for provinces. A matter under Schedule 5 Part B reserved for local government is " traffic and parking".

29. The Act and the Amendment Act were passed by the National Assembly as a 76(1) Bill. After being passed by the National Assembly the Bill was referred to the NCOP for its consideration and concurrence. The provinces constituting the NCOP, bar one, namely the Western Cape, supported the Bill and ensured that the Bill was passed by the NCOP after which it was submitted to the President for his assent.

30. I submit with respect that in enacting the AARTO Act, the requirements of the Constitutional processes for passing Section 76 Bills, a process which the AARTO Bill was part of, were duly fulfilled by seeking and obtaining the concurrence of the NCOP. I submit that as road and traffic regulation falls within the legislative competence of the National and Provincial legislatures the AARTO Bill was properly passed. I deny Applicant's assertion in paragraph 28 of the founding affidavit that the matters are in the exclusive domain of provincial governments as, according to the Applicant, the matter is with respect to *"provincial roads or traffic in relation to traffic and parking at local government level"*. I submit that the legislation is not as narrow as the Applicant posits. I submit that the AARTO Act is aimed at creating a regulatory environment for "road traffic regulation", as envisaged in Schedule 4 Part B of the Constitution,

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and that this is done in order to establish national standards and harmonization for the whole Republic.

31. Subsequent to the above, it is denied that the AARTO Act intrudes on the legislative competence of provinces, and accordingly the Act and its Amendment Act are not unconstitutional. Parliament has therefore acted lawfully within its legislative powers.

SECTION 17 OF THE AMENDMENT ACT

32. I deny that the provisions of Section 17 of the Amendment Act fail to provide for adequate service, specifically in that as alleged by Applicant, these provisions remove the requirement that service of documents must be personal. Personal service is expressly stated in the Amendment Act and therefore is retained. I am surprised about the assertion in paragraph 46 of the Applicants founding affidavit, that personal service and registered mail had been removed, when Section 17 of the Amendment Act does not do so. "Personal service" has been expressly retained. Postage has been expanded to include both registered and ordinary mail at the election of the alleged infringer.
33. The infringer will be required, when she/he registers a vehicle, to choose a method that will be convenient to her\ him. It is submitted that more and more people are moving away from the post office as a service provider and are

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choosing other modes of communication in keeping with the fourth industrial revolution. The choice of service elected by an individual should be respected and given effect thereto.

- 34.** The legislation can only prescribe methods of service that are regarded as acceptable and reasonable. The individual will then choose the form convenient to them. There is nothing unreasonable in this regard. It is without doubt that electronic communication is today the most accurate and reliable form of communication in South Africa. It goes without saying that 4 out of 5 people in the country have a cellular phone and receive SMS on daily basis. The assertion by the Applicant that postage as understood by the applicant is better than electronic mode of service if devoid of any merit and should be rejected.
- 35.** Based on the above, I deny that by not specifically mentioning registered mail, Section 17 makes an inadequate provision for service. Instead, it expands on the existing modes of service, at the election of the individual.
- 36.** Applicant bemoans that service by means of electronic communications such as SMS, email, text or voice note as manifestly inadequate, on the basis, as it alleges, that it could be missed by infringers and treated as junk mail, spam or that it could simply go unopened. I submit that as South Africa is becoming more and more modernised and as the Fourth Industrial Revolution is becoming a regular feature of the new normal, electronic communications is becoming a way



of the Republic's preferred method of connecting with the world. There is absolutely no basis that the Applicant has proffered to assert that infringers will or might deal with electronic communications methods inaptly as applicant alleges. The truth is that a vast majority of South Africans are utilising electronic means of communications with no problem.

37. I wish to emphasise that the method that the individual chooses when registering a vehicle, is the method that the Authority will use to serve any notice. It is, with respect, presumptuous and speculative for the Applicant to assert that people in the country, who on a daily basis use electronic methods for communicating, and who would have made a choice of how they wish to be notified, would be prejudiced by their choice.

ADMINISTRATIVE ENFORCEMENT

38. An infringer who has been served with an infringement notice alleging that he or she has committed an infringement, may make a representation in the prescribed manner, with respect to that notice and infringement to the Authority.
39. If the representations are rejected, the representations officer may advise the infringer of his or her right of review or appeal to the Tribunal and must serve or

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cause to be served on the infringer a prescribed written notification informing him or her.

40. An infringer who is unhappy with the decision of the Appeals Tribunal may challenge the decision either by way of review or appeal to the Magistrates Court.
41. The Amendment Act shifts enforcement from a default system of judicial enforcement of traffic laws through criminal law to a compulsory system of administrative enforcement of traffic laws through administrative enforcement of traffic laws through administrative representations, administrative fines or penalty and demerit point system.
42. The completion of enforcement through the criminal law system often results in an infringer being left with a criminal record against their name. One of the advantages of enforcement through administrative process means that an infringer who has failed to comply with the infringement notice, courtesy letter and/or enforcement order or whose representations to the Authority have been rejected will have demerit points recorded against their name and have their name and demerits updated on the National Road Traffic Offences Register ("the Register"). However, at the end of it all, judicial oversight is the ultimate to those who still remain aggrieved by the administrative process which did not yield desired results for them. A court could still be approached for judicial review under PAJA.

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43. I turn to deal with the allegations made by the Applicant in the founding affidavit. All allegations therein not specifically admitted by me are denied. All allegations in the founding affidavit which are inconsistent with what I have stated herein are equally denied.

44. AD PARAGRAPH 1

The contents of this paragraph are noted.

45. AD PARAGRAPH 2

The contents of this paragraph are noted but are denied in as far as they differ with what is stated herein.

46. AD PARAGRAPH 3

42.1 I note the Applicants constitutional challenge of the AARTO Act and the Amendment Act. I deny that the AARTO Act and the Amendment Act are unconstitutional as alleged or at all.

42.2 I admit that AARTO creates a single national system of road traffic regulation. The AARTO introduces a standardized uniform system of dealing with infringements in the national, provincial and local levels of government.

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42.3 It bears emphasising that the AARTO legislation is a Section 76 Act and that it was passed by both houses of Parliament. It is noted that the Applicant accepts that the purpose of the legislation is to regulate road traffic. A further purpose of the legislation is to standardize traffic regulation throughout the Republic. In the circumstances I deny that the AARTO is invalid and/or unconstitutional.

47. AD PARAGRAPH 4 to 5

43.1 I deny that there are constitutional inconsistencies in the AARTO Act and or the Amendment Act. I specifically deny that Section 17 of the Amendment Act removes the requirement that service under AARTO Act must be by personal service or by registered mail.

43.2 To start with, personal service is specifically mentioned in the Amendment Act as a method in terms of which service may be effected.

43.3 I submit that the non-mention of registered post and its substitution by "postage" is not a diminution of this method of service. I submit that the result of postage will be that more and more methods of secure posting, such as that offered by Postnet and couriers will add to the efficacy of "postage" as a method available to an infringer.

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43.4 The service of notices by electronic means is with respect not inadequate as alleged by the Applicant. I submit that service by electronic means will add to the efficacy of service and increase the choices available to persons when they make their selection regarding how they want to be served.

43.5 In the circumstances I deny that there is valid reason for the AARTO Act and or the Amendment Act to be declared unconstitutional or invalid.

48. AD PARAGRAPHS 6 to 14

The contents of these paragraphs are noted. I further noted Applicant's admission in paragraph 12 of the founding affidavit that the purpose of the AARTO Act is that it establishes a framework for the national government, provincial governments and local governments to facilitate intergovernmental relations. I wish to emphasise that the legislation is aimed at ensuring uniform standards of road traffic and transport regulation and harmonisation among all spheres of government. I submit that the standardisation and harmonisation of road traffic and transport regulation will add to better and certain regulatory environment throughout the country.

49. AD PARAGRAPH 15 to 25

The contents of these paragraphs are noted.

50. AD PARAGRAPHS 26 TO 33

I deny that the AARTO Act and the Amendment Act unlawfully intrude on the exclusive powers or legislative competences reserved for the local and provincial governments. I deny further that the AARTO and the Amendment Act are invalid or unconstitutional and say so because the AARTO falls within the ambit of Part A of Schedule 4 of the Constitution and has been enacted as per the constitutional requirements.

51. AD PARAGRAPH 34

47.1 I note Applicant's persistence that the provisions of the AARTO Act and the Amendment Act are unconstitutional, due, allegedly to their failure to provide for adequate service. I deny the allegations that the provisions are unconstitutional.

47.2 Apart from the above, the contents of this paragraph are noted.

52. AD PARAGRAPHS 35 TO 45

The contents of these paragraphs are noted.

53. AD PARAGRAPH 46

I deny the allegation that Section 17 of the Amendment Act removes the requirements for personal service. I submit further that the requirement that service be effected by means of postage does not remove registered mail. I

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submit, on the contrary that registered postage is retained and that more methods of service, including from agencies other than the post office are included. In short, postage makes the choices available to the alleged infringer wider and more convenient.

54. AD PARAGRAPH 47

The contents hereof are noted.

55. AD PARAGRAPH 48

I deny the allegation that the forms of service provided for are inadequate as alleged or at all. I submit that in the prevailing circumstances of modern times and the fourth industrial revolution, electronic communication is an effective and more reliable form of communication. It is therefore, the most reliable and effective platform for service of documents. In any event other methods of service are retained by the legislature at the choice of an individual.

56. AD PARAGRAPH 49

I deny that an infringer will not receive or read or open a notice that would have been sent to him or her to the platform that he would have selected when registering his or her vehicle. I submit that the majority of infringers will be reasonable and responsible people who will open and peruse correspondence referred to them. The Applicant has made the sweeping allegations that infringers

will not open and read their notices. Applicant has not provided a shred of evidence in substantiation of this allegation.

57. AD PARAGRAPH 50

53.1 I deny the allegation that the rights of alleged infringers will be negatively impacted, allegedly by lack of inadequate service. I have already shown that personal service is specifically catered for in the Amendment Act, and that contrary to the unsupported allegation by applicant that electronic messages will not come to the attention of the alleged infringer, the contrary is true. The South African society is more and more receptive to a variety of modes of communication, and electronic communication is the most dominant one.

53.2 I have also shown that postage has evolved to include postage by providers other than the post office. The fact that the infringer himself will have chosen the mode of service is adequate assurance that the notice will be served properly and to the correct person.

53.3 In the premises I deny the allegations herein contained.

58. AD PARAGRAPH 51

I deny that the Amendment Act in anyway removes the requirement for personal service and reiterate that this mode of service is specifically mentioned in the

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Amendment Act. I reiterate further that the usage of postage as a method of serving documents, is to ensure that the scope of postage is increased, inter alia, to include service providers other than the post office.

59. AD PARAGRAPH 52

The contents of this paragraph are noted.

60. AD PARAGRAPHS 53 AND 54

For reasons set out in the preceding paragraphs, the allegations herein contained are denied.

61. AD PARAGRAPH 55

I deny that either the AARTO or the Amendment Act is invalid and unconstitutional as alleged or at all. However, in the event of the Honourable Court finding that the AARTO and the Amendment Act are unconstitutional, which is denied, and that there is no interpretation that can survive the constitutional invalidity on any grounds advanced by the Applicant, I pray that the Honourable Court should suspend the declaration of invalidity for a period of 24 months to enable parliament to rectify the alleged invalidity.

WHEREFORE, I pray for the dismissal of the Application with costs, including the costs of three Counsel.

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 DEPONENT

I HEREBY CERTIFY THAT THIS AFFIDAVIT WAS SIGNED AND SWORN TO BEFORE ME AT 1 Michau ON THIS THE 15 DAY OF OCTOBER 2020 BY THE DEPONENT WHO ACKNOWLEDGE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, WHO HAD NO OBJECTION TAKING THIS OATH, CONSIDERED THIS OATH TO BE BINDING ON HIS CONSCIENCE, AND THE REGULATIONS CONTAINED IN THE GOVERNMENT NOTICE NO. R1258 OF 21 JULY 1972 AS AMENDED BY NOTICE R 1648 DATED 19TH AUGUST 1977 HAVING BEEN FULLY COMPLIED WITH.



 COMMISSIONER OF OATHS

FULL NAMES:

CAPACITY:

BUSINESS ADDRESS:

CHRISTIAN DANIEL BANTJES c/o
 GEOFFREY SUTHERNS ATTORNEYS
 Commissioner of Oaths
 Ex Officio Practising Attorney RSA
 Block 1, Waterfall Terraces
 Waterfall Park, Bekker Rd, Midrand
 Tel: 011 315 5226 · Fax: 011 315 5228

