



Liberty Fighters Network

Est. 2016 - A voluntary association without gain (*Universitas*)

Office of the President: Reyno De Beer

Office: +27(0)72 745 2869 / Cellular: +27(0)67 735 7288

Electronic Mail: reyno@libertyfighters.org

Website: www.libertyfighters.org / Telegram: @libertyfightersnews / Twitter: @LFN_SouthAfrica /

Facebook: Libertyfightersnetwork / YouTube: @LibertyFighters

Date: 13 January 2026

URGENT

ATTENTION: **PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA**

Mr. Cyril Ramaphosa

c/o Ms. Malebo Sibiyi

Email(1): president@presidency.gov.za

Email(2): malebo@presidency.gov.za

Email(3): VincentM@presidency.gov.za

Email(4): Ephenia@presidency.gov.za

Email(5): Mduduzi@presidency.gov.za

Mr President,

**URGENT COMPLAINT – MINISTER OF AGRICULTURE, MR. JOHN STEENHUISEN -
CONCERNING MALADMINISTRATION AMID ESCALATING NATIONAL ANIMAL-HEALTH
CRISES**

A. CONTENTS

A. Contents 2

B. Introduction 2

C. Avian Flu (HPAI): Unlawful conduct and failure to oppose 4

D. Foot-and-Mouth Disease (FMD): Total failure to account and risk of default relief..... 5

E. Disaster-level severity and failure to invoke disaster-management mechanisms..... 6

F. Public communications versus litigation reality..... 7

G. Governance implications 7

H. Request for presidential intervention 8

I. Closing 9

B. INTRODUCTION

1. Liberty Fighters Network (LFN) is a well-known social-justice voluntary association without gain, acting for and on behalf of its members and, where circumstances so require, in the broader public interest. LFN regularly engages in constitutional and administrative-law litigation aimed at ensuring lawful, accountable, and transparent governance, particularly where executive conduct materially affects fundamental rights, food security, and the rule of law.
2. I address this letter to you under circumstances of **acute national urgency**, and as the Head of State and the Cabinet.
3. South Africa is presently confronted with **two concurrent and escalating animal-health crises** — Highly Pathogenic Avian Influenza (HPAI) and Foot-and-Mouth Disease (FMD) — both of which carry profound implications for food security, the agricultural economy,

public confidence in governance, and the constitutional obligation of the State to act lawfully, rationally, and competently in times of crisis.

4. The gravity of the situation is exacerbated by the conduct of the Minister of Agriculture, Mr John Steenhuisen, who has publicly conceded that the FMD outbreak appears to be a battle that is being lost, yet has demonstrably failed to invoke, or even meaningfully engage, the constitutionally mandated disaster-management mechanisms available to the State. Simultaneously, the Minister has failed to account for, or defend, his own decisions before a court of law, resulting in both matters proceeding effectively unopposed.
5. This correspondence therefore constitutes a **formal and urgent complaint** concerning the Minister's conduct, arising from two pending judicial review applications instituted by LFN during 2025, namely:
 - 5.1. The review of the decision to authorise and implement mass vaccination against HPAI. (*LIBERTY FIGHTERS NETWORK +1 v MINISTER OF AGRICULTURE HCGDP CASE NO. 2025-132845*); and
 - 5.2. The review of the decision(s) relating to the vaccination strategy and control measures adopted in respect of FMD. (*LIBERTY FIGHTERS NETWORK +1 v MINISTER OF AGRICULTURE, MR. JOHN HENRY STEENHUISEN N.O. HCGDP NO. 2025-166866*).
6. The complaint is not theoretical, political, or speculative. It arises from ongoing crises, compounded by procedural unlawfulness, non-disclosure, and a failure to oppose judicial scrutiny, all of which are objectively verifiable and capable of precipitating severe national consequences.

C. AVIAN FLU (HPAI): UNLAWFUL CONDUCT AND FAILURE TO OPPOSE

7. In the HPAI review application:

7.1. The Minister **failed to deliver any answering affidavit within the prescribed time periods**, and has failed to do so at all.

7.2. As a result, the Minister has rendered the matter **unopposed**, notwithstanding the fact that the relief sought concerns decisions taken during an active national biosecurity crisis.

7.3. This failure is compounded by the fact that the administrative record delivered by the Minister is **dysfunctional, incomplete, and internally contradictory**, and reveals that:

7.3.1. vaccine procurement and/or sourcing occurred **approximately one month prior** to the issuance of the permit or authorisation relied upon;

7.3.2. at the time of procurement, the vaccines were **not lawfully authorised** for use in the Republic;

7.3.3. no proper consultation with all mandatory and materially interested stakeholders took place; and

7.3.4. the permit appears to have been issued *ex post facto*, in an attempt to retrospectively legitimise implementation already underway.

7.4. The Minister's failure to oppose the review, when viewed together with the content of his own record, demonstrates a **serious dereliction of executive responsibility** and a disregard for judicial oversight during a period of national vulnerability.

D. FOOT-AND-MOUTH DISEASE (FMD): TOTAL FAILURE TO ACCOUNT AND RISK OF DEFAULT RELIEF

8. In the FMD review application, the Minister has:
 - 8.1. **Failed entirely to deliver the record of decision**, notwithstanding proper service of the application by the sheriff and repeated formal demands.
 - 8.2. **Failed to lodge any answering affidavits**, thereby electing not to oppose the review.
 - 8.3. By his inaction, placed the court in a position where it may be compelled to **grant the relief sought in default**, without the benefit of the decision-maker's version, explanation, or justification.
9. This is not a procedural technicality. The relief sought in the FMD matter concerns **active disease-control measures** with potentially far-reaching implications for animal health, trade, and food security.
10. The Minister's failure to participate meaningfully in these proceedings therefore creates the real and foreseeable risk that **critical national decisions will be judicially determined by default**, solely because the executive authority charged with managing the crisis has failed to account under oath or to place the relevant facts before the court.
11. Such conduct is **irrational, negligent, and inconsistent with the duties of a Cabinet Minister**, particularly in circumstances where the Minister has publicly conceded that the outbreak is not being contained.

E. DISASTER-LEVEL SEVERITY AND FAILURE TO INVOKE DISASTER-MANAGEMENT MECHANISMS

12. Both the HPAI and FMD outbreaks have, objectively and cumulatively, **bordered on, and in certain respects reached, disaster-level proportions.**
13. The scale, geographic spread, economic impact, and food-security implications of these outbreaks place them squarely within the category of events capable of classification and coordinated management under the national disaster-management framework.
14. Notably:
 - 14.1. The Minister himself has publicly acknowledged that the FMD outbreak appears to be **a battle that is being lost**, thereby conceding the severity and escalation of the crisis.
 - 14.2. Despite such admissions, there is **no indication whatsoever** that the Minister has formally approached the National Disaster Management Centre (DMC), requested coordinated intergovernmental disaster assistance, or activated the structured disaster-response mechanisms available to him.
 - 14.3. Instead, the Minister has continued to present the response as a departmental or personal intervention, creating the public impression that the matter is being competently managed, while simultaneously conceding that the outbreak is not being contained.
15. This contradiction raises a serious concern that **political image-management and voter optics** have been prioritised over lawful, cooperative governance and the utilisation of constitutionally mandated disaster-management structures.

F. PUBLIC COMMUNICATIONS VERSUS LITIGATION REALITY

16. Notwithstanding the above, the Minister has continued to make public statements portraying his department's actions as lawful, consultative, and procedurally sound.
17. Those statements are **materially inconsistent** with:
 - 17.1. the contents of the HPAI record as delivered;
 - 17.2. the complete absence of a lawful record in the FMD matter; and
 - 17.3. the Minister's own failure to defend his decisions under oath.
18. Mainstream media has not reported on the litigation, the record deficiencies, or the Minister's non-opposition. The result is that the public narrative is shaped by ministerial statements that **do not reflect the true legal and factual position** emerging from the court processes.

G. GOVERNANCE IMPLICATIONS

19. The cumulative effect of the above gives rise to reasonable and serious concerns of:
 - 19.1. maladministration;
 - 19.2. unlawful administrative action;
 - 19.3. disregard for statutory and constitutional duties;
 - 19.4. possible irregular procurement practices;
 - 19.5. failure to invoke disaster-management mechanisms when objectively warranted;and

- 19.6. an erosion of accountability through non-disclosure and non-opposition in court.
20. These matters extend beyond policy disagreement and enter the realm of **institutional governance failure**.

H. REQUEST FOR PRESIDENTIAL INTERVENTION

21. In light of the seriousness of the issues set out above, I respectfully request that you consider, in the exercise of your constitutional and statutory powers:

21.1. **The appointment of a judicial commission of inquiry** into the conduct of the Minister in relation to the HPAI and FMD decisions, including procurement processes, consultation failures, litigation conduct, and the failure to invoke disaster-management mechanisms; **alternatively**

21.2. **The referral of these matters to the Special Investigating Unit (SIU)** for investigation into maladministration, unlawful expenditure, improper conduct, and governance failures connected to the impugned decisions.

22. LFN stands ready to place before the Presidency, the SIU, or any appointed commission:

22.1. the full court records;

22.2. the defective and incomplete administrative record(s);

22.3. proof of service and non-opposition;

22.4. relevant public statements by the Minister; and

22.5. a complete chronology supported by documentary evidence.

I. CLOSING

23. Mr President, this complaint is lodged not merely in the public interest, but out of necessity.

Where a Minister:

23.1. concedes publicly that a national crisis is being lost;

23.2. fails to invoke available disaster-management mechanisms; and

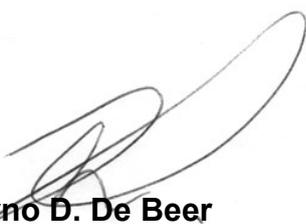
23.3. allows judicial review proceedings concerning that crisis to proceed unopposed,

24. the Republic is exposed to **grave and avoidable risk**.

25. In such circumstances, presidential intervention is not discretionary — it is constitutionally compelled.

26. Your urgent consideration of this complaint against Minister Steenhuisen, will be highly appreciated.

Yours Faithfully,



Reyno D. De Beer

President: Liberty Fighters Network

On behalf of our members

In public Interest