

**IN THE HIGH COURT OF SOUTH AFRICA
WESTERN CAPE DIVISION, CAPE TOWN**

CASE NO: **2026-024184**

In the matter between:

LIBERTY FIGHTERS NETWORK

First Applicant

(A voluntary association without gain *universitas*)

REYNO DAWID DE BEER N.O.

Second Applicant

(cited *nomine officio* as executive official of 1st Applicant)

and

PREMIER OF THE WESTERN CAPE,

First Respondent

MR. ALAN WINDE N.O., OR HIS

SUCCESSOR IN TITLE

SPEAKER OF THE WESTERN CAPE

Second Respondent

PROVINCIAL PARLIAMENT, MR.

DAYLIN MITCHELL N.O., OR HIS

SUCCESSOR IN TITLE

WESTERN CAPE PROVINCIAL MINISTER FOR LOCAL GOVERNMENT, ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING, MR. ANTON BREDELL N.O., OR HIS SUCCESSOR IN TITLE	Third Respondent
OFFICE OF THE COMMISSIONER OF THE ENVIRONMENT (a constitutional office established in terms of section 71 of the Constitution of the Western Cape, 1997, currently vacant)	Fourth Respondent
SOUTH AFRICAN NATIONAL PARKS	Fifth Respondent
CAPENATURE	Sixth Respondent
CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY	Seventh Respondent
CHAIRPERSON OF CAPE PENINSULA BABOON MANAGEMENT JOINT TASK TEAM, MR. ROBERT McGAFFIN N.O., OR HIS SUCCESSOR IN TITLE	Eighth Respondent

JUDITH ANNE SOLE

Ninth Respondent

WILDLIFE ANIMAL PROTECTION

Tenth Respondent

FORUM OF SOUTH AFRICA

BABOON ADVISORY GROUP

Eleventh Respondent

**REPLYING AFFIDAVIT TO THE SIXTH AND SEVENTH RESPONDENTS'
COMBINED ANSWERING AFFIDAVIT**

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I, the undersigned,

REYNO DAWID DE BEER

(ID NO. 760623 5089 080)

Declare under oath as follows:

Introduction

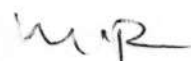
1. I am a major male, South African citizen, the Second Applicant and also a member and the President of **LIBERTY FIGHTERS NETWORK** ("**LFN**"), the First Applicant, of address and contacting details as per the notice of motion. I bring this application in my *nomine officio* capacity as an inseparable organ of **LFN**.
2. The facts contained in this affidavit are, to the best of my knowledge and belief, both true and correct.
3. I confirm and verify that any annexure attached to this affidavit and filed herewith is what it purports to be, and that it appears as described in this affidavit for the purpose for which it is intended.
4. I confirm that any words or phrases appearing in ***bold italics*** throughout this affidavit are abbreviations or defined terms which have been identified and introduced in the Founding Affidavit, or earlier in this affidavit for ease of reference and consistency.
5. I confirm that this Replying Affidavit is delivered strictly in response to *res nova* raised in the Answering Affidavit delivered on behalf of the Sixth and Seventh



U.R

Respondents (the **City** and **CapeNature**) – together referred to herein as "**Respondents**" – deposed to by Mr Robert McGaffin.

6. Inasmuch as my confirmation under oath in the Founding Affidavit, deposed to *nomine officio* as executive official of **LFN**, constitutes *prima facie* proof of my authority to institute these proceedings on behalf of the Applicants, its members, and in the public interest, and in light of the **Respondents** nevertheless persisting in placing such authority in issue, I have reduced my formal decision to institute this application to writing on the official **LFN** letterhead. For the avoidance of any doubt, and without conceding that such further proof is legally required, I annex hereto as Annexure "K" a written record of my decision, duly signed, confirming that the institution of these proceedings was authorised in my capacity as President and executive official of **LFN**.
7. Save as is expressly admitted herein, each allegation inconsistent with the Founding Affidavit is denied, and no allegation not answered herein should be construed as admitted, particularly where the Answering Affidavit itself states that it is 'truncated' and that non-engagement is not to be treated as admission.
8. Subsequently, I will emphasise the following subject headings and address the relevant paragraphs in the Answering Affidavit dealing with them:-
 - 8.1. Prejudice and timetable allegations;
 - 8.2. Annexure "AA7": Approval "for the **CPBMJTT**" and absence of independent approvals by each organ of state;
 - 8.3. Rule 53 "abuse" and record/decision traceability;



- 8.4. **Commissioner**: legal existence and relevance of complaint;
- 8.5. Urgency: self-created urgency disputed with AA7 timing correction;
- 8.6. Standing and authority: Rule 7(1) dispute and production of written decision record;
- 8.7. Non-joinder: Shark Spotters / Cape Baboon Partnership;
- 8.8. Misjoinder: Sole; and
- 8.9. **SANParks** non-response.

Prejudice and timetable allegations

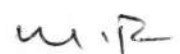
9. In paragraphs 10–11 of the Answering Affidavit (p. 5), the deponent alleges “*oppressive time constraints*” and that the **Respondents** were “*seriously prejudiced*” in opposing Part A.
10. The aforesaid allegation is materially incomplete. On 10 February 2026 at 08h23, I addressed an email to all parties, expressly indicating that the Applicants would prejudice themselves by extending the time for delivery of answering affidavits until close of business on 11 February 2026. A copy of that email and proof of receipt are annexed as Annexures “L” to “M”, respectively.
11. In consequence, the **Respondents**’ assertion of “*oppressive time constraints*”, without disclosing the consensual extension afforded, is denied. I respectfully submit that the Court should assess any alleged prejudice with due regard to the extension and the **Respondents**’ election to file notwithstanding.



M.P.

Annexure "AA7": Approval "for the CPBMJTT" and absence of independent approvals by each organ of state

12. In paragraph 245 of the Answering Affidavit (p. 57), the deponent denies that the **Respondents** have "*obscured*" decision-making and asserts that approval of the **Final Action Plan** by the respective authorities is apparent from, *inter alia*, a joint statement of 20 November 2025.
13. The denial is contradicted by the **Respondents'** own Annexure "AA7", which is the signature page for approval of the **Final Action Plan**. This attachment records in express terms, "APPROVED FOR THE CAPE PENINSULA BABOON MANAGEMENT JOINT TASK TEAM". It further bears signature dates on/about 28 – 29 January 2026.
14. The Applicants do not contend that representatives of the respective bodies have not signed AA7. The Applicants' point, confined to *res nova*, is that the operative approval recorded on AA7 is approval "for" the **CPBMJTT**, and **not** proof of duly taken, independent administrative or executive decisions by each of the **City, CapeNature** and **SANParks**, in accordance with each body's own statutory processes, delegations, and internal governance requirements.
15. To the extent that the **Respondents** contend that the **City, CapeNature**, and **SANParks** each separately and lawfully approved the **Final Action Plan** as a *decision of that organ of state*, they are called upon to identify and produce:
 - 15.1. the empowering provisions relied upon by each body;
 - 15.2. the decision-maker and capacity in which such decision was taken;



- 15.3. the date(s) of the independent decisions;
- 15.4. the minutes/resolutions/records and reasons; and
- 15.5. any delegations relied upon.
16. This is consistent with paragraph 7 of the Applicants' Notice of Motion (Founding papers p. 5), which seeks production of the very decision records and authorisations relied upon to implement the **Final Action Plan**.

Rule 53 "abuse" and record/decision traceability

17. In paragraphs 105–110 (p. 33) and 118–121 (p. 35) of the Answering Affidavit, the **Respondents** contend that the Applicants have not brought a review and that the Applicants' approach constitutes a vexatious or abusive "*indirect attack*" and "*subverts Rule 53*".
18. The contention is denied. The Applicants' Part A relief includes an order compelling the **Respondents** to disclose the decisions, decision-makers, dates, and record relied upon to implement the **Final Action Plan** (Founding papers p. 5, paragraph 7). The relief is directed at enabling traceability of administrative action and facilitating a proper review in due course once the record is produced.
19. The **Respondents**' own Annexure "AA7" demonstrates why this disclosure is essential: the **Final Action Plan** is recorded as approved "for" a task team, rather than by a clearly identified empowered authority acting independently. In the absence of disclosure of the underlying decisions and delegations, the

Applicants cannot reasonably be expected to plead a conventional Rule 53 review against unidentified decisions.

20. The Applicants accordingly persist in the relief sought in paragraph 7 of the Notice of Motion, and deny that such relief is abusive; rather, it is responsive to the very uncertainty created and perpetuated by the **Respondents'** own annexures and denials.

Commissioner: legal existence and relevance of complaint

21. In paragraphs 69–73 (pp. 23–24), paragraph 106 (p. 33), and paragraph 123 (p. 35) of the Answering Affidavit, the **Respondents** advance the contention that the Office of the **Commissioner** is “*de facto*” non-existent, redundant, and unlikely to be filled, and that alternative oversight bodies render the **Commissioner** complaint irrelevant.
22. The contention is denied. The **WC Constitution** provides in peremptory terms that “*There is a provincial Commissioner for the Environment*”, and further requires provincial organs of state to assist and protect the **Commissioner** and prohibits interference with the functioning of the **Commissioner**. The **Commissioner's** functions expressly include investigating complaints in respect of environmental administration.
23. The **Respondents'** Annexures “AA11” and “AA12” (pp. 117–119 of the Answering Affidavit) confirm that a constitutional amendment bill has lapsed and is now being considered for revival through parliamentary processes.



MR

Those annexures do not constitute a constitutional amendment in force, and do not suspend or displace the presently operative constitutional text.

24. The **Respondents'** attempt to treat the **Commissioner** as irrelevant on the basis of non-appointment is inconsistent with the constitutional obligation to perform constitutional obligations diligently and without delay. For this reason, the Applicants persist in relying on the **Commissioner** complaint as a relevant component of context and threatened harm, without repeating the substance of the complaint herein (which is fully set out in the founding papers and annexures).

Urgency: self-created urgency disputed with AA7 timing correction

25. In paragraphs 122–127 of the Answering Affidavit (pp. 35–36), the **Respondents** allege that urgency is self-created and that Applicants delayed unreasonably.
26. The **Respondents'** timeline is materially undermined by their own Annexure "AA7", which reflects that approval of the **Final Action Plan** (as recorded) occurred only on/about 28 – 29 January 2026. It follows that the operative approval and imminent implementation relied upon by the **Respondents** is substantially more recent than their narrative suggests.
27. The Applicants' case on urgency remains as pleaded in the Founding Affidavit, and is supplemented only to the extent necessary to record the AA7 approval date and the imminent risk of irreversible consequences should interim relief be refused.



Standing and authority: Rule 7(1) dispute and production of written decision record

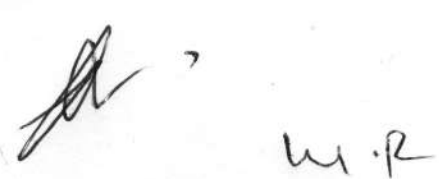
28. In paragraphs 128–133 and 148–150 (pp. 37–40) of the Answering Affidavit, the **Respondents** dispute *locus standi* and the authority of the Second Applicant to institute proceedings on behalf of the First Applicant and/or the public, and further threaten punitive costs, including *de boniis propriis*.
29. The Applicants' *locus standi* arises, inter alia, from section 38 of the national Constitution (including association standing and public-interest standing) and section 32 of the *National Environmental Management Act, 1998 (Act No. 107 of 1998)* ("**NEMA**"), which permits appropriate relief in respect of breaches or threatened breaches of environmental law, including in the public interest. Those legal bases are not displaced by the **Respondents**' characterisation of the Applicants' interest.
30. As to authority, I humbly cross reference to paragraph 6 *supra*.
31. I further record that the **Respondents** delivered notices in terms of Rule 7(1) and Rule 35(12), and that the Applicants furnished **LFN's** full constitution and the requested documents on/about 9 February 2026, before the **Respondents** filed their Answering Affidavit. Proof of such delivery is annexed as Annexure "N".
32. The **Respondents**' request for punitive costs is denied as unfounded. The Applicants prosecute constitutional and environmental rights litigation in the public interest. The Applicants respectfully contend that punitive costs threatens

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should be approached cautiously and in accordance with established principle.
This is recorded solely in response to paragraph 150.

Non-joinder: Shark Spotters / Cape Baboon Partnership

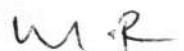
33. In paragraphs 154–156 (p. 41), the **Respondents** allege that the **City** concluded a three-year Memorandum of Agreement with “Cape Baboon Partnership” commencing January 2025 and that an addendum is being concluded; they contend the alleged counterparty has a direct and substantial interest and must be joined.
34. The **Respondents** do not attach the alleged agreement, nor do they provide proof of the legal identity, registration, or juristic status of “Cape Baboon Partnership” or “Shark Spotters” as pleaded. The Applicants cannot responsibly admit the allegation on the papers as they stand.
35. According to searches done on the CIPC company registration database, and the Western Cape Government’s official database pertaining to non-profit organisations (NPO), neither ‘Shark Spotters’ nor ‘Cape Baboon Partnership’ are registered as either an NPC or NPO. I attach these reports I personally obtained as proof and attached as Annexures “O” to “R”.
36. It is important to note that the website baboons.org.za, presented as the official website of the so-called ‘Cape Baboon Partnership’, records on its “About Us” page that Shark Spotters has entered into an agreement with the **CPBMJTT**, and not with the City. A copy of the relevant webpage accessed by myself on 12 February 2026, is attached hereto as Annexure “S”.

Handwritten signature and initials at the bottom right of the page. The signature is a stylized cursive mark, and the initials 'W.R.' are written in a simple, blocky font.

37. Nevertheless, in order to avoid any suggestion of prejudice to an interested party, on 11 February 2026 the Applicants served the urgent application by email on "Shark Spotters" as the presumed entity referred to by the **Respondents**, invited participation, and received confirmation of receipt. The service email and confirmation are annexed as Annexures "T" to "V".
38. The Applicants accordingly submit that any non-joinder concern is curable. Should the Court conclude that joinder is required, the Applicants tender to take such steps as the Court directs, including formal joinder, without delaying Part A interim relief.

Misjoinder: Sole

39. In paragraphs 151–153 (pp. 40–41), the **Respondents** allege that Ms Sole is misjoined and that another party (Monkey Valley Resort) should have been an applicant, and they contend that they cannot answer her affidavit.
40. The Applicants deny that the citation of Ms Sole is an abuse. The Applicants cited Ms Sole because she is directly implicated in the factual matrix pleaded and her evidence is relevant for the complete adjudication of issues. The **Respondents'** litigation posture toward Ms Sole is a matter for them; it does not render urgent interim relief incompetent.
41. In any event, if the Court considers any joinder regularisation necessary, the Applicants submit that this can be addressed without striking the application or refusing urgent relief.



SANParks non-response

- 42. At the time of deposing to this replying affidavit, **SANParks** has not filed an answering affidavit, and no request for extension has been received. This is recorded as a factual position relevant to the state of the pleadings.
- 43. The Applicants persist in the relief sought in Part A and, in due course, Part B, as pleaded, and the Applicants pray for the relief set out in the Notice of Motion.

WHEREFORE the Applicants for the relief set out in the Notice of Motion.

REYNO DAWID DE BEER

Deponent

Signed and sworn to me at AKASIA SAPS on this 12 day of **FEBRUARY 2026** the deponent having acknowledged that he knows and understands the contents of this affidavit and that he has no objection against taking the prescribed oath, which oath he regards as binding on his conscience and that all other prescribed formalities have been complied with.

W. D. Blom 29223342

COMMISSIONER OF OATHS

Full Names: W. A. P. Rejoice Blom

Address: 01 Piet Buitenbach Rosslyn 0200

Designation: Constable





Liberty Fighters Network

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

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Electronic Mail: reyno@libertyfighters.org

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

Facebook: Libertyfightersnetwork / YouTube: @LibertyFighters

RECORDING OF A DECISION TAKEN BY THE PRESIDENT OF LIBERTY FIGHTERS NETWORK DATED ON OR ABOUT 26 JANUARY 2026 TO LODGE AN URGENT COURT APPLICATION

HAVING been engaged with an ongoing dispute on behalf of our members, and in the interests of the public, pertaining to the Cape Peninsula Baboon Management Joint Task Team, possessing all the required information to make an informed decision,

AND with the authority vested in me as the President of Liberty Fighters Network (LFN), a voluntary association without gain, in accordance with Article 38(1)(e) of the **LFN** Constitution, after consultation with the National Working Committee, in so far required in my own discretion, I make the following decision:-

1. That LFN and I, in my official capacity, lodge an urgent application in the High Court (Western Cape Division, Cape Town) for necessary sought relief against the following respondents:-

1.1. The **PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE ("Premier")**, cited in his official capacity as the political executive responsible to head the Western Cape Province, as contemplated in

section 125 of the **Constitution** and section 35 of the *Constitution of the Western Cape, 1997* ("**WC Constitution**").

1.2. The **SPEAKER OF THE WESTERN CAPE PROVINCIAL PARLIAMENT, MR. DAYLIN MITCHELL N.O., OR HIS SUCCESSOR IN TITLE**

1.3. The **WESTERN CAPE PROVINCIAL MINISTER FOR LOCAL GOVERNMENT, ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING, MR. ANTON BREDELL N.O., OR HIS SUCCESSOR IN TITLE**

1.4. The **OFFICE OF THE COMMISSIONER OF THE ENVIRONMENT**

1.5. The **SOUTH AFRICAN NATIONAL PARKS**

1.6. The **CAPENATURE**

1.7. The **CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY**

1.8. The **CHAIRPERSON OF CAPE PENINSULA BABOON MANAGEMENT JOINT TASK TEAM, MR. ROBERT McGAFFIN N.O., OR HIS SUCCESSOR IN TITLE**

1.9. **JUDITH ANNE SOLE**

1.10. The **WILDLIFE ANIMAL PROTECTION FORUM OF SOUTH AFRICA**

1.11. The **BABOON ADVISORY GROUP**

2. I record further that I would prosecute these proceedings in my discretion in accordance with the authority vested in me by the **LFN** Constitution.


Reyno D. De Beer

President: Liberty Fighters Network

"L"

Subject: EXTENSION TO DELIVER ANSWERING AFFIDAVITS: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026

From: Reyno De Beer - LFN International <reyno@libertyfighters.org>

Date: 2026/02/10, 08:23

To: deirdre.o@fairbridges.co.za, Geordin.hillewis@capetown.gov.za, "customercare@capenature.co.za" <customercare@capenature.co.za>, "info@capenature.co.za" <info@capenature.co.za>, mayor.mayor@capetown.gov.za, "Ald Eddie Andrews (DA)" <Edwin.Andrews@capetown.gov.za>, enviro@capetown.gov.za, Emlyn Williams <Emlyn.Williams@capetown.gov.za>, Alan.Winde@westerncape.gov.za, Premier.Winde@westerncape.gov.za, speaker@wcpp.gov.za, reagen.allen@wcpp.gov.za, "anton.bredell@westerncape.gov.za" <anton.bredell@westerncape.gov.za>, "graham.paulse@westerncape.gov.za" <graham.paulse@westerncape.gov.za>, "TableM@sanparks.org" <TableM@sanparks.org>, "Babalwa.Dlangamandla@sanparks.org" <Babalwa.Dlangamandla@sanparks.org>, mkhabela@mhalaw.co.za, refiloe@mhalaw.co.za, mmasetshaba@mhalaw.co.za, kamohelo@mhalaw.co.za, glen@maserumulecpt.co.za, jamie@maserumulecpt.co.za, Cape Peninsula Baboon <cpbmjtt@capetown.gov.za>, "cpbmjtt@sanparks.org" <cpbmjtt@sanparks.org>, "cpbmjtt@capenature.co.za" <cpbmjtt@capenature.co.za>, "judy@monkeyvalleyresort.com" <judy@monkeyvalleyresort.com>, Tracy De Breuyn <traxdb@gmail.com>, administrator@wapfsa.org, waldohelives@icloud.com, chrisjonllo@gmail.com, krok@mweb.co.za, stcamail@gmail.com

Good day,

I refer to the Notice of Motion in the above application, and in particular the requirement that all parties deliver their answering affidavits by 12h00 today, Tuesday, 10 February 2026.

The Applicants are, without admission of any fault in the determination of the urgent timetable, amenable to accept the delivery of any answering affidavit by **close of business on Wednesday, 11 February 2026**. This indulgence is granted on the basis that the Applicants will consequently be constrained to file their replying affidavit(s) by noon on Thursday, 12 February 2026 only.

This indulgence is afforded purely on good terms and in the interests of procedural fairness and efficiency, and shall not be construed as any concession whatsoever regarding the urgency of the matter or the procedural steps already taken.

All the Applicants' rights, as well as those of their members and the broader public interests they seek to protect, remain fully reserved *in toto*.

PS: Kindly note the Important/Disclaimer Notice underneath our signature for your information.

Kind Regards,

Reyno De Beer

President: Liberty Fighters Network

Office: +27 (0) 72 745 2869

Mobile: +27 (0) 67 735 7288

Telegram News Channel: [@libertyfightersnews](#)

Facebook: [libertyfightersnetwork](#)

Twitter: [@LFN_SouthAfrica](#)

YouTube: [Reyno De Beer, Liberty Fighter #1](#)

Website: [www.libertyfighters.org](#)

Email: reyno@libertyfighters.org

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On 2026/02/09 19:05, Reyno De Beer - LFN International wrote:

TO: CAPENATURE

Sixth Respondent

c/o Chief Executive Officer: Dr. Ashley Naidoo

c/o **FAIRBRIDGES ATTORNEYS** (To be confirmed)

Per: **DEIRDRE OLIVIER**

Ref: DO/AA/10144964

TO: CITY OF CAPE TOWN METROPOLITAN

"M"

Subject: Read: EXTENSION TO DELIVER ANSWERING AFFIDAVITS: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
From: Deirdre Olivier <deirdre.o@fairbridges.co.za>
Date: 2026/02/10, 08:23
To: Reyno De Beer - LFN International <reyno@libertyfighters.org>

Your message

To: Deirdre Olivier
Subject: EXTENSION TO DELIVER ANSWERING AFFIDAVITS: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
Sent: Tuesday, 10 February 2026 08:23:05 (UTC+02:00) Harare, Pretoria

was read on Tuesday, 10 February 2026 08:23:57 (UTC+02:00) Harare, Pretoria.

Final -recipient: RFC822; deirdre.o@fairbridges.co.za
Disposition: automatic-action/MDN-sent-automatically; displayed
X-MSEch-Correlation-Key: eP1bXunSFEyNJw72dUYIcw==
Original -Message-ID: <b64d5993-91cc-461c-910a-85f04185fb25@libertyfighters.org>
X-Display-Name: Deirdre Olivier

"N"

Subject: COMBINED RESPONSE TO RULES 7(1) AND 35(12) NOTICES BY 6TH AND 7TH RESPONDENTS: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
From: Reyno De Beer - LFN International <reyno@libertyfighters.org>
Date: 2026/02/09, 19:05
To: deirdre.o@fairbridges.co.za, Geordin.hillewis@capetown.gov.za, "customercare@capenature.co.za" <customercare@capenature.co.za>, "info@capenature.co.za" <info@capenature.co.za>, mayor.mayor@capetown.gov.za, "Ald Eddie Andrews (DA)" <Edwin.Andrews@capetown.gov.za>, enviro@capetown.gov.za, Emlyn Williams <Emlyn.Williams@capetown.gov.za>
CC: Alan.Winde@westerncape.gov.za, Premier.Winde@westerncape.gov.za, speaker@wcpp.gov.za, reagen.allen@wcpp.gov.za, "anton.bredell@westerncape.gov.za" <anton.bredell@westerncape.gov.za>, "graham.paulse@westerncape.gov.za" <graham.paulse@westerncape.gov.za>, "TableM@sanparks.org" <TableM@sanparks.org>, "Babalwa.Dlangamandla@sanparks.org" <Babalwa.Dlangamandla@sanparks.org>, mkhabela@mhalaw.co.za, refiloe@mhalaw.co.za, mmasetshaba@mhalaw.co.za, kamohelo@mhalaw.co.za, glen@maserumulecpt.co.za, jamie@maserumulecpt.co.za, Cape Peninsula Baboon <cpbmjtt@capetown.gov.za>, "cpbmjtt@sanparks.org" <cpbmjtt@sanparks.org>, "cpbmjtt@capenature.co.za" <cpbmjtt@capenature.co.za>, "judy@monkeyvalleyresort.com" <judy@monkeyvalleyresort.com>, Tracy De Breuyn <traxdb@gmail.com>, administrator@wapfsa.org, waldohelives@icloud.com, chrisjonlo@gmail.com, krok@mweb.co.za, stcamail@gmail.com

TO: CAPENATURE

Sixth Respondent

c/o Chief Executive Officer: Dr. Ashley Naidoo

c/o **FAIRBRIDGES ATTORNEYS** (To be confirmed)

Per: **DEIRDRE OLIVIER**

Ref: DO/AA/10144964

TO: CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY

Seventh Respondent

- 1) Executive Mayor: Mr Geordin Hill-Lewis
- 2) Deputy Mayor and Mayoral Committee Member – Spatial Planning and Environment: Mr Eddie Andrews
- 3) Executive Director: Spatial Planning and Environment – City of Cape Town: Mr Rob McGaffin

4) Senior Legal Advisor: Ms Emlyn Williams

Office of the City Manager (Legal Services)

c/o **FAIRBRIDGES ATTORNEYS** (To be confirmed)

Per: **DEIRDRE OLIVIER**

Ref: DO/AA/10144964

**AND TO: PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE
N.O., OR HIS SUCCESSOR IN TITLE**

First Respondent

c/o Ms Faadia Joseph

**AND TO: SPEAKER OF THE WESTERN CAPE PROVINCIAL
PARLIAMENT, MR. DAYLIN MITCHELL N.O., OR HIS
SUCCESSOR IN TITLE**

Second Respondent

**AND TO: WESTERN CAPE PROVINCIAL MINISTER FOR LOCAL
GOVERNMENT, ENVIRONMENTAL AFFAIRS AND
DEVELOPMENT PLANNING, MR. ANTON BREDELL N.O.,**

OR HIS SUCCESSOR IN TITLE

Third Respondent

AND TO: OFFICE OF THE COMMISSIONER OF THE ENVIRONMENT

Fourth Respondent

c/o First to Third Respondents

AND TO: SOUTH AFRICAN NATIONAL PARKS

Fifth Respondent

Parks Manager: Table Mountain National Park (SANParks)

c/o MKHABELA HUNTLEY ATTORNEYS INC. (To be confirmed)

Reference: SAN2-0038 /Mr L Mkhabela/

Correspondent: c/o MASERUMULE ATTORNEYS (To be confirmed)

Reference: Mr Glen Cassells

AND TO: CHAIRPERSON OF CAPE PENINSULA BABOON

**MANAGEMENT JOINT TASK TEAM, MR. ROBERT
McGAFFIN N.O., OR HIS SUCCESSOR IN TITLE**

Eighth Respondent

- 1) c/o Mr Robert McGaffin
- 2) Senior Legal Advisor: Ms Emlyn Williams

Office of the City Manager (Legal Services)

AND TO: JUDITH ANNE SOLE

Ninth Respondent

**AND TO: WILDLIFE ANIMAL PROTECTION FORUM OF SOUTH
AFRICA**

Tenth Respondent

c/o Administrator and Coordinator: Ms Megan Carr

AND TO: BABOON ADVISORY GROUP

Eleventh Respondent

c/o Tom Cohen, Chris Hart, Garth Kew, and Simon's Town

Civic Association

Dear Sir/Madam,

KINDLY FIND ATTACHED the combined response to the Rules 7(1) and 35(12) notices by the Sixth and Seventh Respondents, with its Annexure “**LFN1**”.

KINDLY confirm receipt, alternatively the electronic notification received from the mail delivery system will be considered as suitable receipt.

--

PS: Kindly note the Important/Disclaimer Notice underneath our signature for your information.

Kind Regards,

Reyno De Beer

President: Liberty Fighters Network

Office: +27 (0) 72 745 2869

Mobile: +27 (0) 67 735 7288

Telegram News Channel: [@libertyfightersnews](#)

Facebook: [libertyfightersnetwork](#)

Twitter: [@LFN_SouthAfrica](#)

YouTube: [Reyno De Beer, Liberty Fighter #1](#)

Website: [www.libertyfighters.org](#)

Email: reyno@libertyfighters.org

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— Attachments: —

260209-S-LFNvCoCTMMandCapeNature-Combined Response to Rule 7(1) and Rule 35(12).pdf	518 KB
Annexure LFN1__Rule 35(12) Notice-240623-S-LFN Amended Constitution 23 June 2024.pdf	8.3 MB

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Searches Conducted Today: **0**

Current Subscription Option: **FREE**

Subscription Expiry Date: **2026/02/11 23:59:59 PM**

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Shark Spotters

SEARCH



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Enterprise Name	Enterprise / Tracking Number	Status	View
We did not find any enterprises matching your search criteria.			

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Non-Profit Organisations registered on the NPO database.

Search

Per Province

All Provinces (/index.php/organisations/index/0/0)	235
Eastern Cape (/index.php/organisations/index/10/0)	2
Free State (/index.php/organisations/index/11/0)	0
Gauteng (/index.php/organisations/index/9/0)	16
Kwazulu-Natal (/index.php/organisations/index/12/0)	0
Limpopo (/index.php/organisations/index/3/0)	1
Mpumalanga (/index.php/organisations/index/8/0)	0
North West (/index.php/organisations/index/2/0)	0
Northern Cape (/index.php/organisations/index/5/0)	1
Western Cape (/index.php/organisations/index/1/0)	211

Per Organisation Type

All Types (/index.php/organisations/index/0/0)	235
District (/index.php/organisations/index/0/5)	5
Other (/index.php/organisations/index/0/4)	118
Section 21 Company (/index.php/organisations/index/0/3)	65
Sport (/index.php/organisations/index/0/2)	8
Trust (/index.php/organisations/index/0/1)	39

Page 1 of 1, showing 0 records out of 0 total, starting on record 0, ending on 0

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The general public can access information on NPOs providing services to WCED schools.




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Various NPOs can use the database to share ideas and learn from each other.



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SEARCH SUBSCRIPTION

Daily Search Limit: **100**

Searches Conducted Today: **0**

Current Subscription Option: **FREE**

Subscription Expiry Date: **2026/02/12 23:59:59 PM**

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Enterprise Name ▾

Cape Baboon Partnership

SEARCH



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Please note that this search only retrieves the first 200 results. Be more specific with your search criterion to return a smaller set of results.

Enterprise Name	Enterprise / Tracking Number	Status	View
We did not find any enterprises matching your search criteria.			

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Baboon Hotline: +27 71 588 6540

[Email: hello@baboons.org.za\(mailto:hello@baboons.org.za\)](mailto:hello@baboons.org.za)[DONATE](#)[CONTACT US](#)

About Us

Connecting communities, authorities and the environment for the adaptive management of baboons

The Chacma baboon (*Papio ursinus ursinus*) is indigenous to the Cape Peninsula and plays an important ecological role in supporting Cape Town's rich biodiversity and fynbos biome.

Throughout their sub-Saharan range, baboons prefer to use more productive, low-lying land for foraging, and high-lying areas such as cliffs and tall trees in which to roost. However, rural and urban development on the Peninsula has resulted in the transformation of significant portions of low-lying natural land into residential, commercial, industrial (i.e., urban) and/or agricultural (i.e., rural) landscapes, corresponding to a decline in the natural habitat available for baboons.

Despite this, the overall baboon population on the Peninsula has increased steadily since 2002.

Furthermore, with few hard boundaries defined between human transformed and natural spaces, coupled with inconsistent management efficacy, incursions by baboons into urban and rural spaces, driven by access shelter and human-derived foods, has increased. The resultant rise

in negative interactions between humans and baboons has led to adverse welfare conditions for baboons, damage to property and negative impacts on people and pets. Furthermore, conflict between community groups has risen due to differing values and beliefs regarding baboon conservation and management strategies coupled with an information vacuum created by management authorities.

To reduce conflict and improve baboon and community well-being and welfare, an inclusive and collaborative approach between authorities, management bodies and communities is being developed. The Cape Peninsula Baboon Joint Task Team (CPBJTT), a cooperative structure between three spheres of government – the City of Cape Town, South African National Parks and Cape Nature – are responsible for ensuring the sustainable management of the Cape Peninsula Chacma Baboons. The CPBJTT entered into an agreement with **Shark Spotters (<https://sharkspotters.org.za/>)**, a well-established human-wildlife conflict non-profit organisation, to perform operational tasks to implement the **Cape Peninsula Baboon Strategic Management Plan (<https://baboons.org.za/wp-content/uploads/2025/02/baboon-strategic-management-plans.pdf>)** including:

- The continuation of the Baboon Ranger Programme on selected troops
- Assisting in the roll-out of an infrastructure programme to establish hard boundaries between natural areas and the urban environment where suitable
- Implementing a baboon population research programme
- Ensure ongoing and regular public updates through the relevant media channels that have been established under the Cape Baboon Partnership banner
- Develop, drive and engage public education and awareness programmes around baboons and the Cape Peninsula Baboon Strategic Management Plan

Shark Spotters consulted widely on a new name for their baboon management branch, and has decided on the 'Cape Baboon Partnership' with the aim of connecting communities, authorities and the environment for the adaptive management of baboons on the Cape Peninsula.

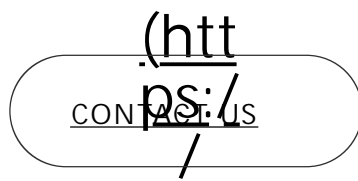
While the agreement with the CPBJTT started on 1 January 2025, due to limited timeframes for implementation Shark Spotters contracted NCC Environmental Services(link), who have been the previous service provider for baboon management on the Peninsula for January and February 2025. The Cape Baboon Partnership launched fully operationally on 1 March 2025.

Shark Spotters wishes to thank NCC for their assistance and support in ensuring a smooth transition and for providing their guidance and expertise in baboon-human conflict management

More information around the history of baboon management on the Cape Peninsula and the aims and objectives of the Cape Baboon Partnership will be updated on this website in due time.

HAVE ANY QUESTIONS?

Get in contact with us by clicking the button below!



OUR FACEBOOK

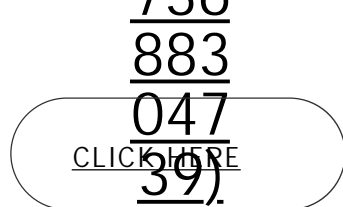
View and interact with our community Facebook page by clicking the button below!

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REPORT A BABOON SIGHTING!

Spotted a baboon in an urban area? Or a baboon with an injury? Or have a general query? Click the button below!



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"T"

Subject: Fwd: URGENT APPLICATION: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
From: Reyno De Beer - LFN International <reyno@libertyfighters.org>
Date: 2026/02/11, 07:07
To: info@sharkspotters.org.za

URGENT ATTENTION: Executive Committee, Shark Spotters

Sarah Waries
Alison Kock
Alan Wellburn

Good day,

I refer you to the above urgent court application due for hearing next week **Tuesday, 17 February 2026** at **10h00** in the **High Court Western Cape Division, Cape Town**.

Find attached the complete application, annexures, and mediation notice.

We have been informed by the City of Cape Town Metropolitan Municipality that “**Shark Spotters**”, with unknown registration status, which we believe is your organisation, is an interested party not cited and that you have a right to be heard too. Regrettably, we were not aware of your interests and herewith provide you with the required papers should you want to become involved in this matter. If you do, we would surely be amenable to accommodate your opposition within our set timeline.

Kindly confirm receipt, alternatively an electronic notification by the mail server will be regarded as receipt.

PS: Kindly note the Important/Disclaimer Notice underneath our signature for your information.

Kind Regards,

Reyno De Beer

President: Liberty Fighters Network

Office: +27 (0) 72 745 2869

Mobile: +27 (0) 67 735 7288

Telegram News Channel: [@libertyfightersnews](#)

Facebook: [libertyfightersnetwork](#)

Twitter: [@LFN_SouthAfrica](#)

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Subject:URGENT APPLICATION: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026

Date:Thu, 5 Feb 2026 11:24:50 +0200

From:Reyno De Beer - LFN International reyno@libertyfighters.org

Organization:Liberty Fighters Network

To:Alan.Winde@westerncape.gov.za, speaker@wcpp.gov.za, anton.bredell@westerncape.gov.za <anton.bredell@westerncape.gov.za>, TableM@sanparks.org <TableM@sanparks.org>, Babalwa.Dlangamandla@sanparks.org <Babalwa.Dlangamandla@sanparks.org>, info@capenature.co.za <info@capenature.co.za>, Geordin.hilllewis@capetown.gov.za, Ald Eddie Andrews (DA) <Edwin.Andrews@capetown.gov.za>, enviro@capetown.gov.za, Cape Peninsula Baboon <cpbmjtt@capetown.gov.za>, judy@monkeyvalleyresort.com <judy@monkeyvalleyresort.com>, administrator@wapfsa.org, stcamail@gmail.com

CC:Premier.Winde@westerncape.gov.za, Tammy.DeDecker@westerncape.gov.za, reagen.allen@wcpp.gov.za, graham.paulse@westerncape.gov.za <graham.paulse@westerncape.gov.za>, customercare@capenature.co.za <customercare@capenature.co.za>, mayor.mayor@capetown.gov.za, cpbmjtt@sanparks.org <cpbmjtt@sanparks.org>, cpbmjtt@capenature.co.za

cpbmjtt@capenature.co.za, Tracy De Breuyn traxdb@gmail.com,
chrisjonllo@gmail.com, waldohelives@icloud.com, krok@mweb.co.za

URGENT

**TO: PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE
N.O., OR HIS SUCCESSOR IN TITLE**

First Respondent

**AND TO: SPEAKER OF THE WESTERN CAPE PROVINCIAL
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Third Respondent

AND TO: OFFICE OF THE COMMISSIONER OF THE

ENVIRONMENT

Fourth Respondent

c/o First to Third Respondents

Same contacting details as for the First to Third Respondents

AND TO: SOUTH AFRICAN NATIONAL PARKS

Fifth Respondent

AND TO: CAPENATURE

Sixth Respondent

c/o Chief Executive Officer: Dr. Ashley Naidoo

AND TO: CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY

Seventh Respondent

- 1) Executive Mayor: Mr Geordin Hill-Lewis
- 2) Deputy Mayor and Mayoral Committee Member – Spatial Planning and Environment: Mr Eddie Andrews

3) Executive Director: Spatial Planning and Environment – City
of Cape Town: Mr Rob McGaffin

AND TO: **CHAIRPERSON OF CAPE PENINSULA BABOON
MANAGEMENT JOINT TASK TEAM, MR. ROBERT
McGAFFIN N.O., OR HIS SUCCESSOR IN TITLE**

Eighth Respondent

c/o Mr Robert McGaffin

AND TO: **JUDITH ANNE SOLE**

Ninth Respondent

AND TO: **WILDLIFE ANIMAL PROTECTION FORUM OF SOUTH
AFRICA**

Tenth Respondent

c/o Administrator and Coordinator: Ms Megan Carr

AND TO: **BABOON ADVISORY GROUP**

Eleventh Respondent

c/o Tom Cohen, Chris Hart, Garth Kew, and

Simon's Town Civic Association

Dear Sir/Madam,

KINDLY FIND ATTACHED, and considered you to be served, documents in respect of an **Urgent Court Application** to be heard on **Tuesday, 17 February 2026** at **10h00** consisting as follows:-

- 1) Notice of Motion and Founding Affidavit;
- 2) Annexures “**A**” to “**J**”;
- 3) Rule 16A Notice; and
- 4) Rule 41A Mediation Notice.

KINDLY confirm receipt, alternatively a system generated electronic confirmation will be accepted as having been received and proper service.

--

PS: Kindly note the Important/Disclaimer Notice underneath our signature for your information.

Kind Regards,

Reyno De Beer

President: Liberty Fighters Network

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— Attachments: —

260204-S-LFNvWCPremier-NoM_and_Founding_Affidavit_202625_6659_2026.02.05.09.36.pdf	4.7 MB
Annexures A to J.pdf	14.0 MB
260205-F-LFNvWCPremier-Rule 16A.pdf	590 KB
260205-F-LFNvWCPremier-Rule 41A Mediation Notice.pdf	694 KB

"U"

Subject: Automatic reply: URGENT APPLICATION: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026

From: Jamila Janna-Mlambo <jamila@sharkspotters.org.za>

Date: 2026/02/11, 07:09

To: Reyno De Beer - LFN International <reyno@libertyfighters.org>

Hi there,

Please note that I am currently away with limited internet access. If your email is urgent, please indicate this in the subject line and I will attend to it as soon as possible.

NB: If I respond after hours, please do not feel obligated to reply outside your normal working hours.

Kind regards,

"V"

Subject: Read: Fwd: URGENT APPLICATION: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
From: Jamila Janna-Mlambo <jamila@sharkspotters.org.za>
Date: 2026/02/11, 09:47
To: Reyno De Beer - LFN International <reyno@libertyfighters.org>

Your message

To: Jamila Janna-Mlambo
Subject: Fwd: URGENT APPLICATION: LIBERTY FIGHTERS NETWORK v. PREMIER OF THE WESTERN CAPE, MR. ALAN WINDE N.O., OR HIS SUCCESSOR IN TITLE # 2026-024184 # Baboons2026
Sent: Wednesday, 11 February 2026 07:07:05 (UTC+02:00) Harare, Pretoria

was read on Wednesday, 11 February 2026 09:47:50 (UTC+02:00) Harare, Pretoria.

Final -recipient: RFC822; jamila@sharkspotters.org.za
Disposition: automatic-action/MDN-sent-automatically; displayed
X-MSEch-Correlation-Key: N1DoQqvIYU0fPKn0AHsctQ==
Original -Message-ID:
f60f7271-028a-421b-9360-0d6022393cd1@libertyfighters.org
X-Display-Name: Jamila Janna-Mlambo