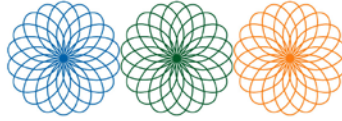


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ENVIRONMENTAL LAW

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Your Reference: 8028/2015/Z46
(previously 3081/15/P19)

My Reference: AP/LP/ELA-JHB SAFCEI

State Attorney Pretoria
SALU Building
316 Thabo Sehume Street
PRETORIA
0001

Attention: Mr Eben Snyman

E-mail: EbSnyman@justice.gov.za

4 August 2016

Dear Mr Snyman

Re: Earthlife Africa – Johannesburg / The Minister of Energy and Others

We refer to the above matter.

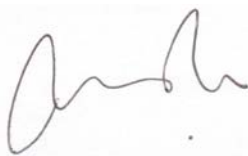
Our counsel are at an advanced stage of finalising our clients' replying affidavit. However, a number of documents are referred to in your clients' answering affidavit which we require in order to be in a position to finalise the replying affidavit.

In light of the above, we would be most grateful if you could let us have the following documents:

1. The proposal to Cabinet that the Minister signed off for the roll-out of the new nuclear power plants (referred to in paragraph 36.2 of the answering affidavit);
2. The Integrated Nuclear Infrastructure Review by the IAEA (referred to in paragraph 45 of the answering affidavit);
3. The Terms of Reference for the NNEECC (referred to in annexure ZM17 to the answering affidavit, at page 1281);
4. The Communication and Stakeholder Engagement Strategy (referred to in annexure ZM17 to the answering affidavit, at page 1281);
5. The Phased Decision Making Approach for implementing the nuclear programme (referred to in annexure ZM17 to the answering affidavit, at page 1281);
6. The designation of Eskom as the Owner and Operator of Nuclear Power Plants in South Africa (referred to in annexure ZM17 to the answering affidavit, at page 1281);
7. The 2004 Bilateral International Agreement with the Russian Federation (referred to in paragraph 49.2 of the answering affidavit);
8. The May 2013 Agreement between Russia and South Africa signed during the BRICS summit meeting in Durban (referred to in paragraph 49.3 of the answering affidavit);
9. The Invitation to attend vendor parade workshops sent to the Republic of Korea, the United States of America, the Russian Federation, the French Republic, the People's Republic of China, Canada and the Kingdom of Japan (referred to in paragraph 107.4 of the answering affidavit); and
10. The list of topics each vendor country was requested to address relating to the invitation referred to in paragraph 9 above (referred to in paragraph 107.4 of the answering affidavit).

We look forward to receiving the above documents at your earliest convenience.

Yours sincerely



Adrian Leonard Pole