IN THE HIGH COURT OF SOUTH AFRICA

(NORTH WEST DIVISION, MAHIKENG)

CASE NO.: M311/2021

In the application between:

SAKELIGA NPC	Applicant
and	
THE MEMBER OF THE EXECUTIVE COUNCIL: NORTH WEST PROVINCE: COOPERATIVE GOVERNANCE, HUMAN SETTLEMENT AND TRADITIONAL AFFAIRS	1st Respondent
THE MEMBER OF THE EXECUTIVE COUNCIL: NORTH WES PROVINCE: FINANCE	2nd Respondent
THE MINISTER: NATIONAL DEPARTMENT OF COOPERATIVE GOVERNANCE AND TRADITIONAL AFFAIRS	3rd Respondent
THE MINISTER OF FINANCE	4th Respondent
DITSOBOTLA LOCAL MUNICIPALITY	5th Respondent
NALEDI LOCAL MUNICIPALITY	6th Respondent
THE PREMIER: NORTH WEST PROVINCE	7th Respondent
ESKOM SOC LTD	8th Respondent
MAGALIES WATER BOARD	9th Respondent
SEDIBENG WATER BOARD	10th Respondent

SUPPORTING AFFIDAVIT

I, the undersigned,

CHRIS BREEDT

do hereby confirm under oath that:

1 I am a major male businessman with address of business at 113 Church Street, Lichtenburg, North West Province.

2 The facts deposed to herein fall within my personal knowledge unless the context indicates otherwise, and such facts are true and correct.

3 I have read the replying affidavit of Pieter le Roux to the supplementary answering affidavit of the first to third, and seventh respondents. I confirm the correctness of the content of the said replying affidavit in as far as it relates to me and to the situation in Lichtenburg.

ACCESS TO WATER

4 As of May 2023, I had little to no municipal water supply on my property. This situation is not a new occurrence and spans from the year 2022 during which my neighbours and I would only have access to water periodically throughout the week.

5 Certain areas in Lichtenburg continue to enjoy some municipal water while others remain dry, resulting in more than half of the town having to buy water from the few who have access to running water.

6 Having little to no access to water disturbs my business operations. I continue to rely on borehole water for hydration purposes and to sustain limited household and sanitation practices.

7 As illustration of the situation explained hereinabove, I hereto annex a photo album marked "**CB1**", exhibiting the dire situation relating to the lack of water in the town. With reference to the photos in the annexure, I provide some brief context:

7.1 Photo A: Taken on 29 August 2023 at Blydeville: *A child is carrying cans to collect water from fire fighters.*

7.2 Photo B: Taken on 29 June 2023 at Blydeville: *People trying to tap water out of a fire hydrant.*

7.3 Photo C: Taken on 27 August 2023 at Blydeville: *Borehole water being dispersed to the local community.*

ROADS, SEWAGE & WASTE REMOVAL

8 The state of the roads in Lichtenburg has not improved since September 2022 and the roads remain ridden with potholes.

9 Sewage management has not improved and remains a serious problem in the community.

10 Waste removal by the municipality is infrequent and unpredictable. There is no schedule regarding when waste will be removed which results in waste piling up.

11 The local dumping site is not managed and waste is being dumped wherever there is space. This poses a health and biohazard risk to the community.

12 The above are included simply for illustrative purposes. The fact of the matter is that there is practically no service delivery at all in Lichtenberg. The surrounding communities are even worse off.

13 Nothing has changed in Lichtenburg in 2023 and the situation remains dire. Service delivery has collapsed, and, despite promises for years, there has been no improvement. The community of Lichtenberg has been forsaken, and no state response has improved the situation. The community continues to suffer gravely. The last hope for the people of Lichtenberg and the community of Ditsobotla is for the court to compel the state to comply with its Constitutional duties.

_____

DEPONENT

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED:

(a) he knows and understands the contents of this affidavit;

(b) he has no objection to taking an oath;

(c) he considers the oath to be binding on his conscience.

THUS signed and sworn before me, at _____on this the _____ day of _____ **2023**, the Regulations contained in Government Notice No. R1648 of 19 August 1977 (as amended) having been fully complied with.

COMMISSIONER OF OATHS

FULL NAMES:

BUSINESS ADDRESS:

DESIGNATION:

CB1



PHOTO A

PHOTO B



PHOTO C