

Tutorial letter 201/1/2018

Administrative Law

ADL2601

Semester 1

**DEPARTMENT OF PUBLIC, CONSTITUTIONAL
AND INTERNATIONAL LAW**

IMPORTANT INFORMATION:

This tutorial letter contains important information
about your module.

Dear Student

You should have received the following thus far:

The study guide	The text of this module's tutorial matter
Tutorial Letter 101	The general information tutorial letter
Tutorial Letter 201	This tutorial letter (online under Additional Resources)

THIS IS YOUR FINAL TUTORIAL LETTER FOR THE FIRST SEMESTER OF 2018. It contains the following:

- 1 THE OCTOBER/NOVEMBER 2017 EXAMINATION PAPER**
- 2 ASSIGNMENT 01: COMMENTARY**
- 3 ASSIGNMENT 02: COMMENTARY**
- 4 THE EXAMINATION: FORMAT, PREPARATION AND WRITING**

EXAMINATION DATE

ONLY PROVISIONAL DATES ARE PRESENTLY AVAILABLE. PLEASE MAKE SURE THAT YOU HAVE RECEIVED THE **FINAL EXAMINATION TIMETABLE** BY THE END OF **APRIL** (FOR THE **FIRST SEMESTER**).

1 The October/November 2017 examination paper

(Please take note that the answers we provide for the questions in the examination paper are suggested answers. They are meant to guide and assist you in preparing for the examination. Furthermore, they provide guidelines on how you should answer a question using only essential points rather than re-writing the study guide. Pay careful attention to the general comments below on how to formulate your answers to the questions in the examination.)

Set of facts:

Mr Modiga is the owner of a private game reserve (commonly known as Red Mountain), which is situated in Limpopo. On 1 October 2017 Mr Modiga received a notice of expropriation in terms of section 7 of the Expropriation Act 63 of 1975 from the Minister of Public Works stating the following:

- The whole of the property (commonly referred to as Red Mountain) will be expropriated
- The proposed date of expropriation is 1 December 2017
- The offered amount of compensation is R200 000

The Minister of Public Works does have the power to expropriate Mr Modiga's property – this is clear in terms of section 2 of the Expropriation Act 63 of 1975 – which states that the Minister may expropriate property for public purposes. However, Mr Modiga is unaware of the reasons for the proposed expropriation. He was also not informed why the whole of his property, which stretches over 2000 hectares of land, should be expropriated. In addition, the market value of Red Mountain was estimated in July 2017 to be R60 million.

Answer the following questions and substantiate your answers.

Question 1

- 1.1 Is there a general administrative-law relationship present in the set of facts? Give a brief reason for your answer. (3)

No, there is an individual administrative-law relationship, because the Minister's decision only applies to Mr Modiga and the relationship was created by an individual administrative decision. In an individual administrative-law relationship legal rules apply personally and specifically between the parties. In other words, the legal rules apply to specifically identifiable legal subjects. The content of the individual relationship will vary from case to case. Individual relationships are created by individual administrative decisions. Furthermore, individual relationships are not affected by new general legislative provisions, unless the amending Act specifically states that it affects the relationship.

- 1.2 Define "organ of state" with reference to the Constitution. Is there an organ of state in the set of facts? Give a reason for your answer. (8)

Organ of state is defined in section 239 of the Constitution and includes (a) any department of state or administration in the national, provincial or local sphere of government; or any other functionary or institution that (i) exercises a power or performs a function in terms of the Constitution or a provincial constitution; or (ii) exercises a public power or performs a public function in terms of any legislation. However, a court or a judicial officer is not included.

Yes. The Minister of Public Works is an organ of state; forms part of the administration in the national sphere of government. The Minister exercised a power/function in terms of legislation (Expropriation Act).

- 1.3 List two binding sources of administrative law. (2)

The Constitution
Legislation
Case law
Common law
Administrative practice / custom or usage
Ubuntu
International law

- 1.4 Is administrative action in evidence in the set of facts? In your answer, you should give a full definition of the concept "administrative action" with reference to the provisions of the Promotion of Administrative Justice Act (PAJA) 3 of 2000. (12)

Section 1 of PAJA defines "administrative action" as any decision taken, or any failure to take a decision, by -

- (a) an organ of state, when-
 - (i) exercising a power in terms of the Constitution or a provincial constitution; or
 - (ii) exercising a public power or performing a public function in terms of any legislation; or
- (b) a natural or juristic person, other than an organ of state, when exercising a public power or performing a public function in terms of an empowering provision,

which adversely affects the rights of any person and which has a direct, external legal effect.

There are exceptions to the definition. These exceptions are, however, not applicable to the given facts.

Yes, there is an administrative action, ie the decision by the Minister to expropriate Mr Modiga's property. The Minister is an organ of state, who made a decision that negatively affects Mr Modiga's rights. It has a direct, external legal effect. The decision was taken in terms of the Expropriation Act.

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QUESTION 2

2.1 Answer the following questions. Each question is provided with a number of options as possible answers. Only one option/statement in each question is correct. You must, therefore, identify the correct option and write down the number of the option that you have identified next to the question number. (The correct answer is marked in bold.) (5)

2.1.1 Just administrative action is defined in section 33 of the Constitution. The term "..." can also be used to refer to just administrative action.

- (a) proportionality
- (b) applying one's mind to the matter**
- (c) reasonableness
- (d) fairness

2.1.2 The Minister's decision in the set of facts is an example of a...

- (a) true administrative act.**
- (b) judicial administrative act.
- (c) legislative administrative act.
- (d) just administrative act.

2.1.3 Consider the following statement: "Any administrator must act within the powers conferred on him or her by the empowering statute." Which requirement in section 33 of the Constitution resonates this statement?

- (a) Procedural fairness
- (b) Reasonableness
- (c) Lawfulness**
- (d) Impartiality

2.1.4 Which of the following is **NOT** a form of abuse of power by an administrator?

- (a) audi alteram partem**
- (b) *in fraudem legis*
- (c) exercising power with an unauthorised purpose
- (d) exercising power using an unauthorised procedure

2.1.5 The general rule regarding the delegation of powers is that the administrator who has authority to take administrative action must exercise that authority himself or herself. This principle was confirmed in the case of ... where Innes ACJ stated the following:

"Where the legislature places upon any official the responsibility of exercising a discretion which the nature of the subject-matter and the language of the section show can only be properly exercised in a judicial spirit, then that responsibility cannot be vicariously discharged."

- (a) *University of Pretoria v Minister of Education* 1948 4 SA 79 (T)
- (b) *SA Freight Consolidators (Pty) Ltd v Chairman, National Transport Commission* 1987 4 SA 155
- (c) *Foster v Chairman, Commission for Administration* 1991 4 SA 403 (C)
- (d) Shidiack v Union Government 1912 AD 642**

- 2.2 PAJA gives effect to the right to reasonable administrative action. The Constitutional Court has given content to the relevant provision in PAJA that deals with reasonableness. Do you think Mr Modiga's right to reasonable administrative action was infringed? Substantiate your answer with reference to PAJA and case law. (12)

The Constitutional Court had the opportunity to pronounce on the meaning and content of section 6(2)(h) in the landmark decision of *Bato Star Fishing (Pty) Ltd v Minister of Environmental Affairs*. This decision dealt with the allocation of fishing quotas by the Chief Director (responsible for marine management) in the Department of Environmental Affairs and Tourism. The appellant challenged the Chief Director's allocation of his (the appellant's) fishing quota in terms of the provisions of the Marine Living Resources Act 18 of 1998 (MLRA). One of the questions before the Court related to the alleged unreasonableness of the Chief Director's action. The Court, per O'Regan J acknowledged the pre-Constitutional jurisprudence which failed to establish reasonableness or rationality as a free-standing ground of review. O'Regan J referred further to the *Wednesbury* decision and held that the PAJA test draws directly on the language of that decision. However, she emphasised the importance of reading section 6(2)(h) in line with the wording of section 33(1) of the Constitution. She held that even if it may be thought that the language of section 6(2)(h), if taken literally, might set a standard such that a decision would rarely if ever be found unreasonable, that is not the proper constitutional meaning which should be attached to the subsection. The subsection must be construed consistently with the Constitution and in particular section 33 which requires a simple test, namely, that an administrative decision will be reviewable if, in Lord Cooke's words [Lord Cooke in *R v Chief Constable of Sussex, ex parte International Trader's Ferry Ltd* [1999] 1 All ER 129 (HL) at 157], it is one that a reasonable decision-maker could not reach. What will constitute a reasonable decision will depend on the circumstances of each case as it is context-based. O'Regan J then proceeded to enumerate the factors relevant to determining whether a decision is reasonable. They include

- (a) the nature of the decision;
- (b) the identity and expertise of the decision-maker;
- (c) the range of factors relevant to the decision;
- (d) the reasons given for the decision;
- (e) the nature of the competing interests involved; and
- (f) the impact of the decision on the lives and well-being of those affected.

In this scenario one could argue that the Minister's decision was not reasonable, since no reasons for the decision were given. The impact of decision also has a devastating effect on Mr Modiga. The nature of the interests involved: Mr Modiga's house (personal property and livelihood), the building of a house for the President (no reason why it should be there). The impact: Mr Modiga will lose his entire business.

- 2.3 Suppose the Minister's reason for the expropriation was that the Department of Public Works required Mr Modiga's property in order to build a house for the President of South Africa's new wife. Mention the three elements of "proportionality" and explain whether the Minister's decision to expropriate Mr Modiga's property is reasonable (or not) with reference to these elements. (8)

The three elements are: suitability, necessity and weighing up advantages and disadvantages.

In accordance with the requirement of suitability, when exercising his or her powers, the administrator must choose only those means (from the variety of means available) that are most appropriate for achieving the desired end. In other words, there must be a rational connection between the end and the means. In the set of facts it is not clear why the state requires Mr Modiga's farm.

Necessity means that the administrator must take only such steps as are necessary if any prejudice to an individual is involved. In other words, the administrator must choose the action that causes least harm to those who will be affected by the measure. The question here is whether it was necessary for the state to expropriate the property?

Finally, weighing up the advantages and disadvantages is a very important requirement in that it requires weighing up the advantages and disadvantages, and considering the injury to the general public or the individual. The method or means must not be out of proportion to the advantages – the ends to the community. The disadvantage to Mr Modiga is severe, he will lose his entire farm, while the state can build the house elsewhere.

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QUESTION 3

- 3.1 Did the Minister comply with the mandatory requirements for procedural fairness? Explain the relevant provision in PAJA to substantiate your answer. (8)

Section 3(2)(b) of PAJA lists the mandatory requirements:

In order to give effect to the right to procedurally fair administrative action, an administrator, subject to subsection (4), must give a person referred to in subsection (1)

- (i) adequate notice of the nature and purpose of the proposed administrative action;
- (ii) a reasonable opportunity to make representations;
- (iii) a clear statement of the administrative action;
- (iv) adequate notice of any right of review or internal appeal, where applicable; and
- (v) adequate notice of the right to request reasons in terms of section 5

The Minister in the given set of facts only informed Mr Modiga of the administrative action, ie that there will be an expropriation. No, the Minister did not comply with any of the other requirements.

- 3.2 If the Minister decides to depart from the requirements of procedural fairness, as required by PAJA, section 3(4)(b) of PAJA lists certain factors to be considered to determine whether this decision to depart is reasonable and justifiable. List the factors as prescribed by section 3(4)(b). (5)

- the objects of the empowering provision
- the nature and purpose of and the need to take administrative action
- the likely effect of the administrative action
- the urgency of taking the administrative action or the urgency of the matter
- the need to promote an efficient administration and good governance

- 3.3 Suppose Mr Modiga approached the Department of Public Works and requested reasons for the Minister's decision. Would the Minister be obliged to provide Mr Modiga with reasons? Substantiate your answer with reference to the relevant provisions in PAJA. (5)

Yes. Section 5(1) requires the provision of written reasons at the request of any person whose rights have been materially and adversely affected by any administrative action and who has not been given reasons for the action.

Section 5(1): Any person whose rights have been materially and adversely affected by administrative action and who has not been given reasons for the action may, within 90 days after the date on which that person became aware of the action or might reasonably have been expected to have become aware of the action, request that the administrator concerned furnish written reasons for the action.

The administrator (to whom the request is made) is obliged to give that person adequate reasons in writing within 90 days of receiving the request (s 5(2)). In other words, the administrator must provide adequate reasons.

3.4 Suppose the Minister responded to Mr Modiga's request for reasons as follows: "The Department of Public Works requires the mentioned property in order to build a house." Do you think that this response provides an adequate reason? Substantiate your answer with reference to case law. (7)

- There must be a link between the administrative action and the reasons given.
- The reasons must "suit" the administrative action.
- What will constitute adequate reasons will depend on the circumstances of each and every case, that is, the context within which the decision is taken.
- In *Nomala v Permanent Secretary, Department of Welfare* 2001 8 BCLR 844 (E) the court found that the reasons given must be sufficient information for any disappointed applicant to prepare an appeal (the ticking of boxes in this instance disclose nothing of the reasoning process)
- In *Minister of Environmental Affairs and Tourism v Phambili Fisheries (Pty) Ltd; Minister of Environmental Affairs and Tourism v Bato Star Fishing (Pty) Ltd* [2003] 2 All Sa 616 (SCA) the court held that it is apparent that reasons are not really reasons unless they are properly informative. They must explain why action was taken or not taken, otherwise they are better described as findings or other information.
- No. In this scenario one could argue that the reason given by the Minister was vague and inappropriate, because it was insufficient. The reasons did also not suit the administrative decision.

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QUESTION 4

4.1 Briefly explain the three forms of internal control. (6)

- control by superior/senior administrators or specially constituted bodies/institutions (a higher body/more senior person in the same department/office)
- parliamentary control (general administrative policy and matters of public concern may be questioned in Parliament)
- control by public bodies and commissions, such as the public protector and the auditor-general (Constitution has created a number of extrajudicial bodies/institutions that can assist in the creation of such awareness and knowledge and, therefore, in controlling state authority as well)

4.2 What are the powers of senior administrators when exercising internal control? (4)

- (1) The senior functionary or institution has the power to reconsider or re-examine – to "review" the decision and then to confirm it, set it aside or vary the decision. When a decision is varied the decision is substituted by another.
- (2) The senior functionary or institution may consider the validity, desirability or efficacy of the administrative action in question. The controlling body may also take policy into consideration.
- (3) Formal control is also exercised by examining the manner in which the decision was reached.
- (4) Internal control, in the form of an internal appeal, does not give rise to a final and binding decision. As a result, the same matter may be raised again within the same departmental hierarchy.

4.3 Why should internal remedies first be exhausted before an aggrieved person may approach a court of law? (2)

- It is unreasonable for a person to rush to court before his or her internal remedies have been exhausted.
- The internal remedies are usually cheaper and more expedient/easier to use.
- It helps to prevent the courts being overloaded with cases that may be more efficiently dealt with by the administration itself.
- Section 7(2) of PAJA requires that internal remedies must first be exhausted

4.4 When would internal control not be the proper remedy? (7)

- (1) the case has already been prejudged by the administrator
- (2) the decision has been made in bad faith (*mala fide*), fraudulently or illegally, or has in effect not been made at all
- (3) the aggrieved party has an option whether to use the extrajudicial remedy or to proceed direct to judicial review (*Jockey Club of SA v Feldman* 1942 AD 340)
- (4) the administrative authority has come to an unacceptable decision as a result of an error of law (eg when the administrator by reason of "mistake of law" presumes that he or she has the authority to take action)
- (5) the administrative body concerned has agreed that judicial review proceedings may start immediately
- (6) the administrative body concerned has no authority to rectify the particular irregularity complained of
- (7) the internal remedy cannot provide the same protection as judicial review (For example, in *Msomi v Abrahams* 1981 (2) SA 256 (N) this was held to be a strong indication that internal remedies need not be exhausted.)

4.5 Would the judicial remedy of *mandamus* assist Mr Modiga in this matter? Give reasons for your answer. (2)

No, an interdict would be better suited to stop the Minister from expropriating the land.

4.6 List the orders that the court would be able to make in proceedings for judicial review with reference to PAJA. (4)

In terms of section 8(1)(a) the court may direct the administrator

- to give reasons, or
- to act in a required manner (*mandamus*).
-

In terms of section 8(1)(b) the court may make an order prohibiting the administrator from acting in a particular manner. (*interdict*)

In terms of paragraph (c) the court may grant orders setting aside decisions of the administrator.

In terms of section 8(1)(d) the court can declare the rights of the parties involved.

The court can grant a temporary interdict (temporary relief): section 8(1)(e).

The court can make an order as to costs (section 8(1)(f)).

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2 Assignment 01

Set of facts

Ms Nomsa April is a citizen of a war-ravaged country in West Africa. She fled her country of birth, moving gradually southwards and entered South Africa after a long journey. Ms Nomsa April applies for asylum at the Department of Home Affairs in terms of section 21(1) of the Refugees Act 130 of 1998. Pending the outcome of her application for asylum, she was granted an asylum seeker permit in terms of the Act, which allows her to stay temporarily in South Africa. Later, however, her application for asylum is rejected by the authorised refugee status determination officer without any input by Ms Nomsa April. No reasons for the rejection were given, but it later transpired that the rejection was based on the informal notes of the refugee reception officer working in the refugee reception office responsible for issuing her with the asylum seeker permit. From these notes the impression might be gained that the decision had been influenced by certain irrelevant factors suggesting bias on the part of the administrator. The Refugees Act makes provision for review by the Standing Committee and appeal to the Appeal Board of a decision by a refugee status determination officer.

You are a legal adviser working at a non-governmental organisation (NGO) called Consortium for Refugees and Migrants in South Africa (CRMSA). Ms Nomsa April approaches you for assistance on ways and means on how the NGO might be able to come to her assistance.

Answer the following questions and substantiate your answers:

Question 1

Briefly explain what an administrative-law relationship is. Do you think Ms Nomsa April is a subject of an administrative-law relationship? (8)

Suggested answer

An administrative-law relationship exists between two parties in an unequal relationship/vertical. One of the subjects is a person or body clothed in state authority/organ of state who is able to exercise that authority over a person or body in a subordinate position whose rights are affected by the action.

In the general administrative-law relationship the legal rules governing the relationship between the parties apply to all the subjects within a particular group. These rules thus apply impersonally, that is generally and objectively, and non-specifically and not to a particular identifiable legal subject.

In an individual administrative-law relationship legal rules apply personally and specifically between the parties. In other words, the legal rules apply to specifically identifiable legal subjects. The content of the individual relationship will vary from case to case.

Yes, Ms April is subject to an individual administrative law relationship, she is in a subordinate position in relation to officer taking the decision in the Department of Home Affairs. The decision that was made applies to Ms April specifically.

Question 2

Identify the administrative action in the set of facts. In your answer you should give a full definition of the concept “administrative action” as provided in the Promotion of Administrative Justice Act (PAJA) 3 of 2000. (12)

Suggested answer

Section 1 of PAJA defines “administrative action” as any decision taken, or any failure to take a decision, by –

- (a) an organ of state, when-
 - (i) exercising a power in terms of the Constitution or a provincial constitution; or
 - (ii) exercising a public power or performing a public function in terms of any legislation; or
- (b) a natural or juristic person, other than an organ of state, when exercising a public power or performing a public function in terms of an empowering provision,

which adversely affects the rights of any person and which has a direct, external legal effect.

There are exceptions to the definition.

In view of the definition of “administrative action”, the decision taken by the officer in the Department of Home Affairs to reject Ms April’s application for asylum constitutes administrative action. It complies with the definition in that it involves a decision to make a decision by an organ of state (the officer at the Department of Home Affairs) exercising a public power or performing a public function in terms of legislation (the Refugees Act 130 of 1998) which has adversely affected the rights of a person (Ms April) and which appears to have had a direct external legal effect. The exceptions do not apply.

3 Assignment 02

(The correct answers are marked in bold.)

Question 1

“Organ of state” is defined in section...of the Constitution.

- 1. 1
- 2. 33
- 3. 197
- 4. **239**

Question 2

Which of the following is a characteristic of an administrative law relationship?

- 1. One of the legal subjects must be an official in one of the national departments.
- 2. The person in the subordinate position must have been treated unfairly.
- 3. **The organ of state forces the subordinate party to act in a certain manner.**
- 4. The actions of the person clothed in state authority must have been unreasonable.

Question 3

Which one of the following is **NOT** an organ of state?

- 1. The University of Cape Town
- 2. The Deputy President
- 3. The Premier of Gauteng
- 4. **The Deputy Chief Justice of the Constitutional Court**

Question 4

Which one of the following is **NOT** an example of or a form of internal control?

1. The Public Protector
2. Parliamentary enquiries
3. **Judicial review**
4. Chapter 9 (of the Constitution) institutions

Question 5

Which one of the following is **NOT** a ground for judicial review in terms of section 6 of PAJA?

1. The action taken is not rationally connected to the purpose of the empowering provision.
2. **The administrator acted in accordance with provisions relating to time.**
3. The action did not comply with the formal requirements relating to administrative action.
4. The administrator exceeded the geographical limits of the powers conferred.

Question 6

Section ... of PAJA regulates procedural fairness where the administrative decision adversely affects the rights of the public.

1. 3(1)
2. 5
3. **4**
4. 6(2)

Question 7

The *audi alteram partem* rule means that...

1. the administrator must be reasonable.
2. **the administrator must hear both sides.**
3. the administrator must be impartial.
4. the administrator must be well educated.

Question 8

Which one of the following is **NOT** one of the forms of delegation?

1. mandate
2. **directive**
3. deconcentration
4. decentralisation

Question 9

The Constitutional Court interpreted the right to reasonable administrative action in the case of

1. ***Bato Star Fishing (Pty) Ltd v Minister of Environmental Affairs* 2004 4 SA 490.**
2. *R v Chief Constable of Sussex, ex parte International Trader's Ferry Ltd* [1999] 1 All ER 129.
3. *Chairman, Board on Tariffs and Trade v BrencoInc* 2001 4 SA 511.
4. *Kotze v Minister of Health* 1996 BCLR 417 (T).

Question 10

An applicant waits in vain for the issue of his or her passport, he or she may then apply for a ... to compel the administrator to decide on the matter.

1. declaratory order
2. review procedure
3. interdict
4. ***mandamus***

[10]

4 The examination: Format, preparation and writing**Format of the examination paper**

- (1) The format of the examination paper will be similar to the format of the October/November 2017 examination paper.
- (2) You will again be given a short set of facts and some of the questions will be based on these facts.
- (3) There will be FOUR (4) questions with sub-questions in the examination and they will count a total of 100 marks.
- (4) The questions in the examination (both short and long questions) will test your knowledge, your insight and your ability to apply theory to practice. Multiple-choice questions form part of the examination paper, similar to those given in your second assignment.

The shorter type of questions will carry a mark allocation varying between approximately two (2) and eight (8) marks per question.

- (5) You do not have to study any additional study material. However, make sure that you study the court cases and the relevant legal principles pertaining to them, as they are discussed in the guide.

Answering the examination questions

~ As mentioned above, you will write a two-hour examination paper consisting of four (4) (compulsory) questions, counting a total of 100 marks. You must answer all four questions.

~ Read attentively through all the questions in your examination paper in order to gain an idea of what the questions are about. Make sure that you understand the instructions before you start answering the questions. Identify key words and terms.

~ Do not separate subsections of questions, for example, 2(a), then 1(b), then 3(a), by answering them in different places in your examination answer book. If you wish to return to a particular question, simply leave enough space to return to it.

~ Number your answers correctly.

~ Plan your answer roughly before starting to write. You may think that this will take up too much time, but you will in fact gain time by avoiding repetition, irrelevant discussion and confusion.

~ Divide your time according to the number of questions and pay attention to the marks allocated to each question.

~ Avoid repetition and irrelevancies. You will not receive any marks for repeating a fact. Answer questions concisely but not superficially. Include every step in the legal argument in your answer, starting with the first step, no matter how obvious it may seem to you.

~ Distinguish between instructions such as explain, compare, list and analyse. List means just that – no discussion or embellishment is necessary. Make sure that you understand what is expected of you.

~ Give reasons for all your answers (briefly, or fully, depending on what is required). In fact, it is quite a good idea to write as if you are explaining the legal position to an intelligent layperson who knows nothing about the law.

~ When referring to case law, limit your discussion of the facts to the absolute minimum, and concentrate on the legal aspects of the issue. What has happened is of less importance than the reason on which the judgment is based.

~ It is in your own interest to write legibly and intelligibly. Even if your handwriting is a problem, there are still a few things you can do about it: write with dark ink, write on every second line, space your work by leaving lines open between questions, et cetera. Remember: it is to your advantage if we can read what you have written.

~ Finally, please do not contact us after you have written the examination paper. We are not allowed to discuss the paper with students or to divulge examination results. However, we will be only too happy to discuss the course and any difficulties you may experience before the examination.

All that remains is for us to wish you success in the examination.

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