



REPUBLIC OF NAMIBIA

NATIONAL ASSEMBLY

**PUBLIC PROCUREMENT
AMENDMENT BILL**

Much better, but not quite there

Assessing the Public Procurement Amendment Act of 2022

1. Introduction

On 17 March 2022, finance minister lipumbu Shiimi tabled the Public Procurement Amendment Bill¹ in the National Assembly for discussion and enactment. When tabling the Bill, Shiimi stated:

“That leave be given to amend the Public Procurement Act, 2015, so as to insert certain definitions and substitute certain definitions; to provide for the appointment of the Chairperson and the chief executive officer of the Central Procurement Board of Namibia; to clarify certain methods of procurement; to provide for joint procurement of goods and services; to provide for the application for reconsideration of the decisions of the Board or public entities; and to provide for incidental matters.”

¹ <https://www.parliament.na/wp-content/uploads/2022/03/B4-2022-Public-Procurement-Amendment.pdf>

The amendment process started in early 2019, but only really gained momentum in early 2021 when the Procurement Policy Unit (PPU), in the Ministry of Finance (MoF), conducted a series of consultations around proposed changes to the Public Procurement Act².

This process culminated with finance minister Shiimi tabling the amendments in mid-March 2022. The Bill was enacted in the National Assembly and sent to the National Council in April 2022, where further amendments were proposed. These additional amendments were then accepted by the National Assembly when the Bill returned to the National Assembly in June 2022.

This special briefing of *Procurement Tracker Namibia* assesses some of the changes to the Public Procurement Act.

In June 2019, when it became clear that moves were afoot to amend the law, the Institute for Public Policy Research (IPPR) submitted some amendment proposals to the PPU for consideration³. The IPPR's proposals dealt with strengthening or enhancing transparency and accountability and integrity measures and mechanisms in the law.

It had become clear since the law had been operationalised on 1 April 2017 that non-compliance with transparency and accountability provisions in the Public Procurement Act of 2015 was a major implementation challenge. Similarly, even before the law was passed in 2015 and operationalised in 2017, the IPPR had critiqued it for not going far enough in ensuring integrity in the public procurement sphere⁴.

It is these areas of concern and the specific proposals that the IPPR put forward in 2015 and 2019 that this briefing paper will bring into focus once again and use as departure point to analyse and discuss the amendments that have been enacted by the Parliament of the Republic of Namibia in June 2022.

2. Areas of concern

To reiterate, in 2015, the IPPR identified two broad areas of concern in the realm of procurement integrity that were considered under-provisioned for in the then Public Procurement Bill. These two areas were:

- Transparency and accountability;
- Procurement integrity.

In 2019, the same issues were flagged in the submission to the PPU:

- **PART 4:** Accounting Officers, Internal Structure and Bid Evaluation Committees –Timelines and deadlines for compilation and submission of annual procurement plans;
- **PART 10:** Procurement Integrity – 66. Conduct of staff members of public entities.

The following sections will look at what was proposed by the IPPR, what was proposed by the PPU and what was reflected in the Public Procurement Amendment Bill.

2.1 Transparency and accountability

As concerns transparency and accountability, in 2019, the IPPR following monitoring of compliance with the Public Procurement Act of 2015 since April 2017, raised the issue of the timely production and public placement of annual procurement plans with the PPU. The annual procurement plan is a transparency mechanism that enables the public to see and monitor what procurement activities a specific public entity will engage in on an annual basis and provides a basis for holding public entities accountable for their procurement spending and service delivery. However, almost from the beginning of the operationalising of the new public procurement framework it became clear that the absence of timelines and deadlines for production and submission of annual procurement plans was a serious oversight in the law.

² <https://www.lac.org.na/laws/annoSTAT/Public%20Procurement%20Act%2015%20of%202015.pdf>

³ <https://drive.google.com/file/d/1sMgl0doHTuhMX2aQZoDkpNnCbsLKBhJs/view?usp=sharing>

⁴ https://ippr.org.na/wp-content/uploads/2015/10/Special_Briefing_no_9.pdf

IPPR proposal (June 2019)	PPU proposal (March 2021)	Public Procurement Amendment Bill (March 2022)
<p>PART 4: Accounting Officers, Internal Structure and Bid Evaluation Committees – Timelines and deadlines for compilation and submission of annual procurement plans</p> <p>(4) An accounting officer must - (a) engage in procurement planning, plan each step of the procurement process and prepare annual procurement plan;</p> <p>Our concern:</p> <p>While the law and regulations state that an accounting officer must engage in procurement planning and produce an annual procurement plan, nowhere does it stipulate a timetable or deadline for compiling and submitting annual procurement plans to the Procurement Policy Unit.</p> <p>The question we wish to see asked and answered during the amendment review process are: How is it possible to finalise the annual budgets of publicly funded institutions for both capital and operational expenditures that require procurement in the absence of an annual procurement plan?</p> <p>The sequence we would expect would be the following:</p> <ol style="list-style-type: none"> 1. Budget ceilings issued by MoF showing what is available for capital and operational procurements; 2. Annual procurement plans compiled based on these budget ceilings; 3. Annual negotiations on the budget; 4. Final procurement plans and annual budgets agreed and included on the annual Appropriation Act. <p>Our position:</p> <p>We believe strongly that either the law or regulations should specify a timeline and deadline for compilation and submission of annual procurement plans to the PPU by public entities on an annual basis.</p>	<p>PPU concern:</p> <p>The Act and the regulations thereto, state that the Accounting Officers of public entities should file their annual procurement plans with the Procurement Policy Unit, however there is no date stipulated. This has created a discrepancy in that some entities submit their annual procurement plans on time while others not.</p> <p>Proposed remedy:</p> <p>It is therefore proposed that each public entity must submit their annual procurement plan 3 months before the commencement of the new financial year. Therefore, a proposal to amend section 25(4)(a) to read: “An Accounting Officer must: Engage in procurement planning, plan each step of the procurement process and prepare an annual procurement plan to be submitted to the Procurement Policy Unit 3 months before the commencement of the new financial year.”</p>	<p>Amended section 25(4) reads:</p> <p>“(4) An accounting officer must – (a) engage in procurement planning, plan each step of the procurement process and prepare an annual procurement plan, and must submit the plan to the Policy Unit at least three months before the commencement of each financial year; (b) certify the availability of funds before the commencement of each procurement process and ensure that the funds remain committed for the duration of the procurement contract; and (c) ensure that the proceedings of the internal structures of a public entity or the Board are properly recorded and kept in a safe and secure place in the prescribed manner.”; and “(4A) An accounting officer who fails to submit the annual procurement plan on time may be held liable for non-compliance in terms of section 7(4)(a).”</p>

2.1.1 Our assessment

The inclusion of a clear deadline – effectively the end of December of every calendar year – should enhance compliance with the law and improve public insight and oversight of procurement planning, as well as national budgeting, processes, thereby improving transparency if adequately enforced.

2.2 Procurement integrity

This section will look at two aspects, namely:

- Conflict of interest; and
- Disclosure of interest.

2.2.1 Conflict of interest

In terms of procurement integrity, an aspect that the IPPR has had issue with the Public Procurement Act of 2015 from the beginning is the narrow defining of a conflict of interest existing only when a “close relative” was involved.

Treatment of “close relative” in Section 66:

Public Procurement Act of 2015	IPPR proposal (June 2019)	PPU proposal (March 2021)	Public Procurement Amendment Bill (March 2022)	National Council proposal (June 2022)
<p>Conduct of staff members of public entities</p> <p>(2) A staff member referred to in subsection (1) must - (a) disclose his or her interest or the interest of his or her close relative, if any, in terms of section 76, and in this paragraph, “close relative” means parent, sibling, spouse, child or grandchild, having substantial financial interest in the bidding entity; and (b) withdraw from the procurement process if there is a potential conflict of interests, unless the Board or public entity decides that the conflict is trivial to affect the impartiality of the staff member.</p>	<p>Our concern:</p> <p>According to the law conflict of interest only exists where a “close relative” is involved, which sets a very narrow limit and goes against best practices on the topic.</p> <p>This section could be strengthened to include a reference to friends and associates, which would be inline with the provisions of the Charter for the Public Service in Africa, which refers to “family members and friends”.</p> <p>Going even further, the code of conduct for US government officials refers to “any family member or other personal or professional acquaintance”.</p>	<p>PPU concern:</p> <p>The current conflict of interest exists only where a close relative is involved. “Close relative means: - Parent, Sibling, Spouse, Child or Grandchild, having substantial financial interest in the bidding entity. The above scope is too narrow and needs to be broadened in fighting against corruption, bribery and nepotism in procurement. Furthermore, section 66(2)(a) talks about substantial financial interest. The word “substantial” is subject to subjective interpretation.</p>	<p>66A. (1) A staff member of the Board or public entity - (a) who is a member of the procurement committee, bid evaluation committee or procurement management unit of the public entity; (b) who is involved in planning or conducting procurement processes or contract administration in relation to the public entity or Board; or (c) who has a close relative, associate or friend, with a direct or indirect financial, economic or personal interest in the bidding entity or a matter that requires the decision</p>	<p>Section 1 of the principal Act is amended by the substitution for the definition of “close relative” to read as follows: “close relative” means parent, sibling, spouse, child or grandchild, cousin, nephew, niece, aunt, uncle, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law;”</p>

Table continues on page 5

Public Procurement Act of 2015	IPPR proposal (June 2019)	PPU proposal (March 2021)	Public Procurement Amendment Bill (March 2022)	National Council proposal (June 2022)
	<p>Furthermore, the section that reads “unless the Board or public entity decides that the conflict is trivial to affect the impartiality of the staff member”, should be deleted entirely, as unnecessary questions and controversy could arise around what is considered “trivial” in the context of public procurement in a society grappling with corruption and pervasive negative perceptions of the integrity of public officials.</p>	<p>Proposed remedy:</p> <p>Section 66 (2)(a) to read as follows: A staff member referred to in subsection (1) must: (a) disclose his or her interest or the interest of his or her close relatives, friends and associates if any, in terms of section 76, and in this paragraph, “close relative” means parent, sibling, spouse, child, grandchild, cousin, nephew or niece, having substantial financial interest in the bidding entity. The word “substantial” to be deleted from the sentence.</p> <p>Additional proposals:</p> <p>New section 66(3) to read as follows: A Board member, staff member of the Board or a public entity that was involved in the bid preparation process at any stage of a bid and such person indicates that he/she wishes to recuse himself/herself at a later stage because of conflict of interest, such person and the entity he/she is conflicted are prohibited from participating in the bidding process as</p>	<p>of the Board, procurement committee, bid evaluation committee or procurement management unit, must disclose that interest in accordance with subsection (2). (2) The staff member referred to in subsection (1), with an interest referred to in that subsection - (a) must immediately inform the relevant Minister, chairperson or the accounting officer of the interest; and (b) may not participate in the deliberations or take part in the decision-making process in relation to that matter, unless the relevant decision-making body directs otherwise after having considered the matter and having found that there is no conflict of interest.</p>	<p>Motivation:</p> <p>This amendment is necessary to revert back to the original definition as was contained in the Public Procurement Amendment Bill, prior to the Assembly definition from the floor. The definition of “close relative” in the Bill read as follows: “close relative means a spouse, child, grandchild, parent, sibling, cousin, nephew, niece, aunt or uncle;” The terms “father-in-law”, “mother-in-law”, “son-in-law”, “daughter-in-law”, “brother-in-law, “sister-in-law” have been added to the original definition (in the Bill) to cast the net of close family relationships wider. If the definition is narrowed down to exclude cousins, nephews, nieces, aunts, uncles and in-laws, the meaning and impact of “close relative” in the African setting will be lost when matters of conflict of interest of staff members in line with section 76 arise.</p>

Table continues on page 6

Public Procurement Act of 2015	IPPR proposal (June 2019)	PPU proposal (March 2021)	Public Procurement Amendment Bill (March 2022)	National Council proposal (June 2022)
		a bidder or supplier. All staff members employed in a particular Ministry/ Agency shall not conduct business/ procurement with the same public entity.		

2.2.1.1 Our assessment:

The broadening of what constitutes a “close relative”, as well as the inclusion of “associate or friend”, is welcome and casts the potential for addressing conflicts of interest significantly and appropriately wider. Interestingly, the “Additional Proposals” by the PPU take a strict line of excluding both the conflicted official and the entity that embodies the conflict out of the running in any procurement matter. This is inline with what IPPR proposed in 2015, but unfortunately this strict line did not make it into the amended law.

2.2.2 Disclosure of interest

On the whole, the Public Procurement Amendment Bill expands significantly on the disclosure of interest provisions in sections 66 and 76 of the Public Procurement Act of 2015. But this does not happen without incorporating some problematic language around dealing with such conduct.

Public Procurement Act of 2015	Public Procurement Amendment Bill (March 2022)	Our Assessment
<p>66(2) A staff member referred to in subsection (1) must - (a) disclose his or her interest or the interest of his or her close relative, if any, in terms of section 76, and in this paragraph, “close relative” means parent, sibling, spouse, child or grandchild, having substantial financial interest in the bidding entity; and (b) withdraw from the procurement process if there is a potential conflict of interest, unless the Board or public entity decides that the conflict is trivial to affect the impartiality of the staff member.</p>	<p>“(2A) If a staff member of the Board or a public entity involved in the bid preparation process, at any stage of a bid indicates that he or she wishes to recuse himself or herself because of conflict of interest, the staff member may not participate in the bidding process as a bidder or supplier. (2B) The following persons may not participate, either personally or through an entity corporate or incorporate in which he or she has a financial, economic or personal interest, as a bidder or supplier in a procurement process conducted by the Board or public entity: (a) staff members of the public entity; (b) members the Board or staff members of the Board; or (c) members of a board, local authority council, regional council or similar governing body. (2C) A - (a) staff member of a public entity; (b) member of the Board or its staff members; or (c) members of a board, local authority council, regional council or similar governing body, who contravenes or fails to comply with subsection (1), (2A) or (2B) commits an act of misconduct, and the Board or public entity or the relevant functionary may deal with the individual in accordance with the terms and conditions of appointment or may apply the applicable disciplinary procedures.”;</p>	<p>The new section 66 expands quite considerably on the old section, but importantly, whereas 66(2) stated that an official must disclose a material interest and must withdraw from the procurement process, the new subsection (66(2A)) refers to an official who wishes to recuse themselves in the event of a conflict of interest existing, raising the interesting question, what if the official wishes not to recuse themselves? The phrasing here comes across as weak.</p> <p>Similarly, in terms of punitive measures for failing to comply with the various subsections of section 66, the new subsection 66(2C) states that an official “who contravenes or fails to comply with subsection (1), (2A) or (2B) commits an act of misconduct, and the Board or public entity or the relevant functionary may deal with the individual in accordance with the terms and conditions of appointment or may apply the applicable disciplinary procedures.”</p> <p>In other words, the Board or public entity or relevant functionary may or may not deal with the individual in accordance with the terms and conditions of appointment or may or may not apply the applicable disciplinary procedures. This phrasing thus makes the decision to deal firmly with conflict of interest a discretionary decision.</p> <p>This weak language is rectified by simply substituting may for must, as in “the Board or public entity or the relevant functionary must deal with the individual in accordance with the terms and conditions of appointment or must apply the applicable disciplinary procedures.”</p> <p>The same text could also be phrased “the Board or public entity or the relevant functionary must either deal with the individual in accordance with the</p>

Table continues on page 8

Public Procurement Act of 2015	Public Procurement Amendment Bill (March 2022)	Our Assessment
		<p>terms and conditions of appointment or apply the applicable disciplinary procedures.”</p> <p>The enacted weakly phrased punitive treatment of conflict of interest sketched above is inconsistent with how section 66(3) characterises conflict of interest as a serious criminal offence necessitating serious criminal punishment of a high fine and/or long imprisonment.</p>
	<p>“Disclosure of interest by staff members of public entities</p> <p>66A. (1) A staff member of the Board or public entity - (a) who is a member of the procurement committee, bid evaluation committee or procurement management unit of the public entity; (b) who is involved in planning or conducting procurement process or contract administration in relation to the public entity or Board; or (c) who has a close relative, associate or friend, with a direct or indirect financial, economic or personal interest in the bidding entity or a matter that requires the decision of the Board, procurement committee, bid evaluation committee or procurement management unit, must disclose that interest in accordance with subsection (2). (2) The staff member referred to in subsection (1), with an interest referred to in that subsection - (a) must immediately inform the relevant Minister, chairperson or the accounting officer of the interest; and (b) may not participate in the deliberations or take part in the decision-making process in relation to that matter, unless the relevant decision-making body directs otherwise after having considered the matter and having found that there is no conflict of interest. (3) The public entity or Board must record the disclosure of interest made in terms of this section in the minutes of the meeting at which it is made. (4) A staff member contemplated in subsection (1) who fails to comply with that subsection or subsection (2) commits an act of misconduct, and the Board or</p>	<p>Once again, while section 66(A) is a welcome expansion and enhancement of what came before, the phrasing of the punitive provisions in the event of non-compliance in section 66(A)(4) does appear to dilute the seriousness of the disclosure provisions.</p> <p>66(A)(4) states: “(4) A staff member contemplated in subsection (1) who fails to comply with that subsection or subsection (2) commits an act of misconduct, and the Board or public entity may institute misconduct disciplinary proceedings in accordance with the disciplinary procedures of the Board or public entity.”</p> <p>Theoretically, this subsection suggests that despite it being established that an official was guilty of misconduct for having been non-compliant in disclosing an interest, the Board or public entity may or may not institute misconduct proceedings against such official. It thus becomes a discretionary decision. This situation is rectified and the provision strengthened by simply phrasing it as “the Board or public entity must institute misconduct disciplinary proceedings in accordance with the disciplinary procedures of the Board or public entity.”</p> <p>This weak provisioning stands in stark contrast to the very next subsection (5) that clearly treats the same misconduct as a serious criminal offence warranting serious punitive measures.</p>

Table continues on page 9

Public Procurement Act of 2015	Public Procurement Amendment Bill (March 2022)	Our Assessment
	<p>public entity may institute misconduct disciplinary proceedings in accordance with the disciplinary procedures of the Board or public entity. (5) A person who contravenes or fails to comply with this subsection (1) or (2) commits an offence and is liable to a fine not exceeding N\$1 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and such imprisonment.”.</p>	
<p>Disclosure of interest</p> <p>76. (1) A member of the Board, Review Panel, a procurement committee or a bid evaluation committee, a procurement management unit and any staff member thereof having any direct or indirect interest in any matter brought before the Board, Review Panel, a procurement committee, bid evaluation committee or procurement management unit - (a) must immediately inform, as appropriate, the Minister, chairperson or the accounting officer concerned of such interest; and (b) may not participate in the deliberations or any part of the decision-making process in relation to that matter, unless the Board, Review Panel or public entity, directs otherwise after having considered the matter and found the conflict of interest to be of trivial nature or consequences. (2) A person who contravenes or fails to comply with this section commits an offence and is liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and such imprisonment.</p>	<p>“Disclosure of interest by members of Board and Review Panel</p> <p>76. (1) A member of the Board or Review Panel who has, any direct or indirect financial interest in any matter brought before the Board or Review Panel, or who has a close relative, associate or friend with a direct or indirect financial, economic or personal interest in the matter brought before the Board or Review Panel - (a) must immediately inform the chairperson of the Board or Review Panel of the interest; and (b) may not participate in the deliberations or take part in the decision-making process in relation to that matter, unless the Board or the Review Panel directs otherwise after having considered the matter and having found that there is no conflict of interest. (2) The Board or Review Panel must record the disclosure of interest made in terms of this section in the minutes of the meeting at which it is made. (3) A person who contravenes or fails to comply with subsection (1) commits an offence and is liable to a fine not exceeding N\$1 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and such imprisonment.”.</p>	<p>Importantly, the phrase “after having considered the matter and found the conflict of interest to be of trivial nature or consequences” was deleted from the section.</p> <p>In this regard, in 2015, we wrote: “It is unclear what would constitute “of trivial nature or consequences”. Furthermore, it would be interesting to see whether such a justification, whatever the circumstances may be, would hold up in a court of law. This particular wording just seems to complicate things unnecessarily and leaves room for discretionary rationalizing and decision-making.”</p> <p>The amendment of this section also includes the stiffening of the criminal fine for non-compliance, from N\$500,000 to N\$1,000,000, which brings it in line with section 66 and underscores the seriousness of non-compliance with disclosure of interest mechanisms in the new law.</p>

3. Other notable amendments:

- The amendment of section 11 of the Public Procurement Act strips the chairperson and deputy chairperson of the Central Procurement Board of Namibia (CPBN) of the titles, powers and functions of administrative and deputy administrative heads of the Board, with the chairperson also ceasing to be the accounting officer of the Board. A new section, 18A, was inserted that vests administrative and accounting officer powers and functions in a chief executive officer (CEO). According to the PPU, the vesting of administrative and executive powers in the chairperson and deputy chairperson of the board has contributed to governance weaknesses at the CPBN. The separation of these roles and powers and the creation of the CEO position should lead to an improved and more coherent governance structure at the Board, in the view of the IPPR;
- Section 27 introduces two new procurement methods, namely framework agreement and pooled procurement, while sections 38A and 38B respectively, define and circumscribe the use of these two new methods;
- Section 33 is amended to tighten up on the circumstances and procedures around the use of the emergency procurement method, a method that has long been problematic and misused by public entities, a situation that has arguably significantly contributed to widespread suspicions of rampant corruption and mismanagement within the public procurement system. However, despite these amended provisions, it is the view of the IPPR that the amendments do not go far enough to severely constrain or restrict the use and misuse of the method. The relative easy availability of the option of emergency procurement will probably continue to be a governance challenge on the public procurement landscape;
- Section 50 is expanded to require all bidders to show proof of business registration. However, sole proprietorships are inexplicably exempted from the new provisions, despite also having to register and renew registration every two years with the Business and Intellectual Property Authority (BIPA), and to be in possession of a BIPA certificate of good standing, like any other business. This exception seems administratively unnecessary. It is the view of the IPPR that all businesses, no matter the type or size, looking to do business with the Namibian government should be required to prove that they are operating legally under various regulatory frameworks;
- Section 55 is expanded to circumscribe the seven-day standstill period following the awarding of a bid. Importantly, section 55(4C) makes it crystal clear that an accounting officer “may not award a contract or sign any agreement during the standstill period and any contract awarded or agreement signed during the standstill period is invalid”.

4. Notable areas for future amendment consideration:

- It would have been good if provisions had also been introduced among the amendments that vested more independence in the PPU and an expanded law enforcement mandate, in order to give the unit greater powers to regulate and address non-compliance with the law.

5. Conclusion

The Public Procurement Amendment Act of 2022 introduces significant and meaningful changes to the public procurement system. On the face of it, these changes for the most part should contribute over the medium to long term to improved functioning and governance of the public procurement system as a whole, as well as within its component processes and practices.

The new law removes a lot of ambiguity and provides significant definition to what and how the system should look and function optimally.

The new law also pitches the Namibian public procurement system very close to best practice anywhere, at least on paper, and in this regard substantially brings the system in line with Namibia's commitments under such instruments as the United Nations Convention Against Corruption (UNCAC).

This is not to say that the system can do with more improvement, for it sure can, especially around such practices as the use of exemptions, which remains a problematic practice.

That said, in the final analysis, the Namibian Ministry of Finance has to be congratulated for these amendments.

ABOUT THE AUTHOR

Frederico Links has been an IPPR Research Associate since 2009. He has focussed on democracy and elections, party political finance, empowerment policies, internet governance, cybersecurity and public procurement. He has previously worked as a journalist for a range of Namibian publications. He is the current Chairperson of the ACTION Coalition which campaigns for greater access to information in Namibia.

About the Hanns Seidel Foundation (HSF)

Present in more than 60 countries world-wide, the Hanns Seidel Foundation Namibia (HSF) is a German non-profit organisation promoting democracy, good governance and the rule of law across the African continent. Cooperating with its Namibian partners, such as IPPR, HSF also seeks to contribute to sustainable development by strengthening peace, human security and environmental protection.

About IPPR

The Institute for Public Policy Research (IPPR) is a not-for-profit organisation with a mission to deliver independent, analytical, critical yet constructive research into social, political and economic issues that affect development in Namibia. The IPPR was established in the belief that free and critical debate informed by quality research promotes development.

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