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The legal and political implications of a judicial review of the Zondo Commission's findings

ABOVE: Chairperson Advocate Deputy Chief Justice Zondo opens proceedings during the first public hearing on alleged corruption under scandal-tainted former South African president, who was ousted earlier this year, at the Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State (Zondo Commission), in Johannesburg, on August 20, 2018.

GULSHAN KHAN / AFP

By Helen Acton

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Executive summary

Gwede Mantashe, the Minister of Mineral Resources and Energy, has threatened to judicially review the Zondo Commission's ('the Commission') findings against him. This decision highlights legal and political weaknesses in South Africa's democratic system. The law is unclear on whether the findings of a Commission of Inquiry (COI) could constitute administrative action reviewable in terms of the Promotion of Administrative Justice Act 3 of 2000 (PAJA). This was not sufficiently dealt with by the High Court the only time it previously faced a judicial review of a COI's findings. Even if COI findings could constitute administrative action, it seems that the Commission's findings and recommendations concerning Mantashe in particular are unlikely to be reviewable in terms of PAJA. The principle of legality would be his most viable option for a legal challenge, but on analysis it is unlikely Mantashe would succeed on this basis either. Moreover, challenging the findings of this Commission on legally

dubious grounds underscores political weaknesses in the ruling African National Congress (ANC) party, and consequently the electoral system more generally. Not only does the proposed challenge by a senior party member in Cabinet undermine the ANC's steadfast commitment to end entrenched corruption, but it also demonstrates that the party's step-aside rule is too narrow. The rule does not impose political accountability on members implicated by COI findings unless they are criminally charged by the National Prosecuting Authority (NPA). This sets the bar too low for political accountability, which should not be equated with criminal liability. The ANC's lenient step-aside rule, and its members' use of legal technicalities to avoid political accountability, is dangerous in a proportional representation system with a one-party-dominant legislature. Voters elect a party in a closed list system, and so depend entirely on the ruling party to hold its members individually accountable for wrongdoing. The ANC needs to prove to the electorate that it takes this job seriously.

Recommendations

1. In the expected legal review by Mantashe, the courts need to clarify whether the findings against Mantashe by the Commission of Inquiry into Allegations of State Capture constitute administrative action, and thus whether PAJA is applicable or not.
2. ANC members should not undermine the Commission's findings, and the party's commitment to weeding out corruption, by challenging them in court on dubious legal grounds.
3. The ANC's step-aside rule should be extended to apply to party members who have been found to have a reasonable suspicion of criminality against them by the Commission. Political accountability should not depend on criminal accountability; political leaders should be held to a higher standard.
4. The ANC Integrity Commission should continue to prioritise procedural and substantive fairness in any extension of the rule, basing a step-aside decision on fair and comprehensive criteria, and giving implicated members a chance to make representations.



Gwede Mantashe, the Minister of Mineral Resources and Energy

Introduction

On 1 March 2022, the third part of the report from the Commission of Inquiry into Allegations of State Capture was submitted to President Cyril Ramaphosa.¹ The Commission, chaired by the (newly appointed) Chief Justice Raymond Zondo, was tasked with investigating allegations of state capture, and aimed at generally restoring confidence in the government's functioning. In their totality, the reports document pervasive graft in state institutions and implicate high-ranking members of the governing African National Congress (ANC).

In the latest report, Justice Zondo recommended that the NPA conduct further investigations into the “reasonable suspicion” of corruption against Gwede Mantashe – Minister of Mineral Resources and Energy and the ANC’s national chairperson – for his dealings with Bosasa. This “reasonable suspicion” arose because Mantashe received

free services from Bosasa while in the position of ANC Secretary-General. Even if no direct contract resulted from this favour, Justice Zondo reasoned that Mantashe would have known the implications and expectations associated with receiving such favours, since Bosasa manifestly relied on the provision of free security installations as part of its “corrupt *modus operandi*”.

Mantashe has threatened to take the report’s findings on judicial review. He is the first ANC member to do so. This raises an interesting legal issue, since the law is not entirely well-defined on whether Commission of Inquiry (COI) findings can be reviewed in terms of the more rigorous requirements of administrative law under the Promotion of Administrative Justice Act 3 of 2000 (PAJA). It is not yet clear on what grounds Mantashe plans to challenge the report, but the possible bases of judicial review and his likelihood of success will be considered.

¹ <https://www.gov.za/documents/judicial-commission-inquiry-state-capture-report-part-3-viii-1-mar-2022-0000>

What is judicial review?

Judicial review is one of the democratic mechanisms that regulates the exercise of public power. It is an essential cog in the system of separation of powers. The power originates from the South African Constitution, which proclaims in section 1(c) that the rule of law is a founding value of its democracy. Consequently, all branches of government are subject to constitutional review under the rule of law, and the principle of legality which forms part of it. In terms of the rule of law, the Judiciary is empowered to regulate the exercise of public power by the Legislature and the Executive.

Judicial review tries to balance the ongoing tension between two key objectives in a democratic system – giving public officials sufficient freedom to exercise their powers and effectively fulfil their duties; and regulating these powers to protect individuals' rights. There is a vital difference between a judicial appeal and review. An appeal is when a higher legal power makes a finding based on the merits of the decision of a lesser legal power, and rules on whether that decision was substantively right or wrong. A review is not concerned with the merits of a decision, but rather with the way in which the decision was reached. A review does not question whether the decision was correct, only whether the process of decision-making was flawed in some legally recognised way.

Exercises of power by the legislative and executive branches of the government are only reviewable, not appealable, by the judicial branch. Separation of powers concerns dictate that courts must not usurp the role of these decision-makers. Courts must therefore exercise sufficient deference when reviewing the decisions of other branches of the government, bearing in mind that those officials have special expertise and experience in their respective fields.² However, in paying due respect to the route selected by the decision-maker, a court is not obliged to rubber-stamp an unreasonable decision simply because it was made by a seasoned official.³ Thus, the courts are faced with a difficult balancing act.

Grounds of review

Two parallel systems exist when reviewing the conduct of public officials. On the one hand, if the exercise of public power constitutes administrative action, it is reviewed in terms of PAJA. Administrative action is defined in section 1 of PAJA.⁴ Decisions falling within this definition are reviewed in terms of lawfulness, reasonableness and procedural fairness. These are the component parts of the fundamental right to just administrative action as expressed in section 33(1) in the Bill of Rights.

On the other hand, if the exercise of power is not administrative action – in other words, it is of a legislative, executive or judicial nature – then it is reviewable under the common law principle of legality. These decisions are reviewed in terms of lawfulness and rationality. The standard of review is less rigorous than that of administrative action, in the interests of safeguarding the separation of powers.

It is not yet clear on what basis Mantashe aims to challenge the report's findings. He might try to challenge the findings as administrative action – which could subject the decision to stronger judicial scrutiny – or opt for the simpler and more user-friendly “safety net” approach of the principle of legality. Avoidance of PAJA by applicants as well as the courts is an unfortunate trend, as it blatantly ignores constitutionally mandated legislation and is a threat to the section 33 right to just administrative action.⁵

Are the findings of a Commission of Inquiry administrative action?

The answer to this question is unclear. In *President v SARFU*,⁶ it was established that a President's decision to appoint a Commission of Inquiry is executive, not administrative action. However, the law on the nature of a Commission's findings themselves is less apparent.

The courts have been careful to reiterate that there should be no general categorisations as to what kinds of decisions constitute administrative action.⁷ Rather, it should be

² *Bato Star Fishing (Pty) Ltd v Minister of Environmental Affairs and Tourism and Others* 2004 (4) SA 490 (CC) para 48.

³ *Bato Star* supra para 48.

⁴ It is defined in a rather narrow and bulky manner, but can be summarised as follows: a decision of an administrative nature by an organ of state or natural or juristic person, exercising a public power or performing a public function, in terms of legislation or an empowering provision, that adversely affects rights and has a direct external legal effect.

⁵ Lauren Kohn 'Our curious administrative law love triangle: The complex interplay between the PAJA, the Constitution and the common law' (2013) 28 SA *Public Law* 22 p 31; *Albutt v Centre for the Study of Violence and Reconciliation and Others* 2010 (3) SA 293 (CC) is a key example of how the Constitutional Court avoids the application of PAJA, applying the more 'user-friendly' principle of legality instead.

⁶ *President of the Republic of South Africa v South African Rugby Football Union* 2000 (1) SA 1 (CC).

⁷ See *Administrator of Transvaal and Others v Traub and Others* [1989] ZASCA 90 and Ngcobo J's judgment in *Minister of Health v New Clicks South Africa (Pty) Ltd* 2006 (2) SA 311 (CC) para 476.

determined on a case-by-case basis for each individual decision, taking into account its nature and effect. Consequently, no general determination can be made on whether COI findings always constitute administrative action or not. Yet, previous judicial reviews of COIs can act as guiding precedent for this enquiry. It is unfortunate that the only case considering a judicial review of a COI's findings did not deal with the administrative action question.

In the groundbreaking judgment of *Corruption Watch v Arms Procurement Commission*,⁸ the court was asked for the first time to review the findings of a judicial COI. The High Court found that the judiciary has the power to review and set aside the decisions of a COI. The Arms Procurement Commission had been established to investigate the allegations of fraud, corruption, impropriety or irregularity in the strategic defence procurement package, also known as the Arms Deal. Coincidentally, the Arms Deal was the first large scale corruption scandal that involved members of the ANC government.

However, the court did not consider the application of PAJA, rather using the principle of legality and its rationality test as the basis for its decision to set aside the findings. The applicants had argued the case on the grounds of legality and rationality, so the court did not even consider whether it was possible for the decisions of a COI to constitute administrative action.

This is disappointing. It is an important legal question whether COI findings can be reviewed under PAJA, as subjecting COIs to these more exacting legislative requirements could have significant implications on the freedom and independent functioning of COI's. Placing greater constraints on COIs' exercise of power is not necessarily a negative outcome, but it needs to be clarified so that their procedural mechanisms and terms of reference can be adapted accordingly.

Furthermore, the court's approach was incorrect on legal principle. According to the entrenched legal principle of subsidiarity, PAJA is the default pathway for review for administrative action, so an enquiry as to whether an action is administrative or not should be the first step in any judicial review. Only after it has been established that

an exercise of public power does not meet the definition in PAJA, should the principle of legality be considered. This process has been confirmed by the Constitutional Court in *Bato Star*⁹ and *Motau*.¹⁰

Determining whether a decision constitutes administrative action

Judicial or administrative nature?

In deciding whether this Commission's findings constitute administrative action, the court would need to determine whether the decision is of an 'administrative nature'.

Decisions that are judicial in nature are excluded from the administrative action definition.

COIs have similar powers to a court of law in certain respects. For example, the Terms of Reference of the Commission granted it the quasi-judicial powers to subpoena and cross-examine witnesses, and to refer a matter to prosecution. The Commission also has the power to regulate its own process, especially concerning the admissibility of evidence, the manner in which evidence is presented, and how individuals must make submissions.

Furthermore, does the fact that a judicial officer – in fact, the Deputy Chief Justice at the time – assumed the adjudicative functions of the COI, mean that it must be considered a judicial body? I would argue that this should not be overemphasised. The fact that a judge presides over a COI contributes an air of authority and impartiality associated with the judicial branch, but there is no legitimate *legal* distinction between a judicial and other commissions of inquiry. As established in *SARFU*, the determination of whether a decision is administrative in nature must be informed primarily by the *function* of the power exercised, not the *functionary*.¹¹ So, the mere fact that a judge chairs the Commission cannot conclusively determine that the COI has a judicial nature.

The test for determining whether a decision is administrative or judicial in nature was founded in the case of *Sidumo v Rustenberg Platinum Mines*,¹² which adopted a purposive approach to the issue. Two questions must be answered in the affirmative for the decision to be considered

8 *Corruption Watch v Arms Procurement Commission* 2019 (10) BCLR 1218 (GP).

9 *Bato Star* supra note 2 para 25.

10 *Minister of Defence and Military Veterans v Motau and Others* [2014] ZACC 18 footnote 28.

11 *SARFU* supra note 6 para 141.

12 2008 (2) SA 24 (CC).



South African President Cyril Ramaphosa appears to testify before the Zondo Commission of Inquiry into State Capture in Johannesburg, South Africa, on August 11, 2021

administrative action: 1) Are there significant differences between the decision and the proceedings before a court, despite the similarities? 2) Does the separation of powers (and the safeguards it requires) make it constitutionally appropriate to apply section 33 to the conduct?

Despite the similarities between a COI and a court of law, the differences are too substantial to overlook. The most significant difference is that the findings of a COI are not legally binding. Essentially, whether a COI is judicial or not, it is still merely an advisory body to the executive.¹³ Other notable differences are that a COI follows an inquisitorial rather than an adversarial process, the right to legal representation is not absolute, and it is not bound by the same rules of evidence as courts.

It is a credible argument that it is constitutionally appropriate to apply section 33 to the conduct of a COI,

having regard to separation of powers. Since a COI does not have the same safeguards of external and institutional independence as the judiciary, it seems entirely consistent with our constitutional order that the procedures and decisions of a COI be evaluated for lawfulness (in terms of its Terms of Reference and the Commissions Act 8 of 1947), reasonableness and procedural fairness. This calls for appropriate scrutiny by the courts.

Direct and external legal effect?

However, case law seems to intimate that investigatory processes not including the making of binding decisions do not ordinarily amount to administrative action.¹⁴ If a decision is not binding, it cannot be said that it has a direct and external legal effect on an individual, as per the PAJA definition of administrative action. Since the findings of a COI are merely recommendations, it could be reasoned that they do not have a direct legal effect on those implicated,

¹³ *S v Mulder* 1980 1 SA 113 (T).

¹⁴ *Simelane NO v Seven-Eleven Corporation SA (Pty) Ltd* 2003 (3) SA 64 (SCA) para 17; *Competition Commission of SA v Telkom SA Ltd* [2010] 2 All SA 433 (SCA) para 11; *Gamede v Public Protector* 2019 (1) SA 491 (GP).

even though they may have damning repercussions and carry the possibility of criminal or civil prosecution.

Moreover, in this case the report merely recommended further investigations into the “reasonable suspicion” of corruption against Mantashe. *Prima facie* evidence of a crime was lacking. In *Viking Pony Africa*, the Constitutional Court argued that “It is unlikely that a decision to investigate ... which excludes a determination of culpability, could itself adversely affect the rights of any person, in a manner that has a direct and external legal effect”.¹⁵ The judgment held that the detection by an organ of state of the reasonable possibility of wrongdoing was not administrative action, rather it was what that organ decided to do with that information that could trigger the application of PAJA.¹⁶ Consequently, there is doubt as to whether the Commission’s decision concerning Mantashe would constitute administrative action in terms of PAJA.

However, on this line of reasoning it could be plausible that if a COI were to make a determination and pronouncement on *prima facie* cases of culpability in the process of its investigation, the application of PAJA could be triggered.¹⁷ Although this was not the case for Mantashe, it is something for the courts to carefully consider, since the Zondo Commission has recommended that several individuals and companies be prosecuted due to *prima facie* evidence of corruption. These are more conclusive determinations of culpability, to which administrative justice requirements should arguably apply as a result of a more direct effect on rights. This is a contentious point to which courts should now apply their minds.

This further illustrates why it is important for a court to determine whether a specific decision is administrative action on a case-by-case basis, without any general categorisations, since different recommendations from the same COI could possibly have different legal statuses depending on whether there is a more decisive determination of culpability or not.

Is Mantashe likely to be successful?

It appears that the Commission’s recommendation concerning Mantashe was too preliminary to have a

direct legal effect as required by the PAJA definition. Thus, it is most likely that this decision would be reviewed in terms of the principle of legality. Mantashe accused the Commission of making a case out of assumptions, rather than facts. This implies that the investigatory process by which the Commission reached its decision was flawed. The rationality of the decision is the relevant enquiry.

In *Arms Procurement*, the court also subjected the COI’s findings to a rationality review. Applied to this case, the review would ask whether there is a rational connection between the Commission’s recommendations against Mantashe and a legitimate governmental objective. More specifically, procedural rationality applies – whether the *means* of reaching the decision were rationally related to the objective sought to be achieved.¹⁸ This test would concern the evidence before the chairperson and how that evidence was considered in reaching his decision. In *Arms Procurement*, it was held that investigating with an “open and enquiring mind” was vital to this rationality determination in terms of a COI. Was all relevant material considered? Did the chairperson properly consider and investigate all the evidence?¹⁹

Yet, the rationality test sets a very low threshold. There must be *some* connection between the exercise of public power and its purpose. The courts are highly cautious about intervening more assertively than this, to avoid ruling on the merits of a decision-maker’s choice. The court’s deferential approach in a rationality enquiry was emphasised in *Pharmaceutical Manufacturer’s Association* – “The setting of this standard does not mean that the Courts can or should substitute their opinions as to what is appropriate for the opinions of those in whom the power has been vested ... A decision that is objectively irrational is likely to be made only rarely”.²⁰

Applying the rationality test, it would be a dubious argument that the Zondo Commission investigation was not conducted with an “open and enquiring mind”, given the Commission’s quasi-judicial nature and extensive consideration of all the available evidence. The Commission has been running for more than four years, with 400 days of hearings, over 300 witnesses, and 75,000

¹⁵ *Viking Pony Africa Pumps (Pty) Ltd t/a Tricom Africa v Hidro-Tech Systems (Pty) Ltd and Another* [2010] ZACC 21 para 38; own emphasis added.

¹⁶ *Viking Pony* supra para 38.

¹⁷ Pretorius, DM ‘Investigations, Natural Justice and Reviewability: *Msiza v Motau NO & Another*’ (2021) 138 SALJ 20 at 31.

¹⁸ *Albutt* supra note 5 para 52; *Democratic Alliance v President of South Africa and Others* [2012] ZACC 24 para 35.

¹⁹ *Arms Procurement* supra note 8 para 16.

²⁰ *Pharmaceuticals Manufacturers Association of SA, In re: Ex parte President of the Republic of South Africa* 2000 (2) SA 674 (CC) para 90.

pages of documentary evidence. Furthermore, the report specifically highlighted the fact that its key witness on Bosasa corruption, Angelo Agrizzi – Bosasa's former chief operating officer turned whistleblower – gave sometimes contradictory evidence. But it was pointed out that despite this, there was extensive corroboration by other witnesses and the work of the Special Investigative Unit. This is why it recommended further investigations to scrutinise the reasonable likelihood of corruption, rather than making a more conclusive declaration on Mantashe's *prima facie* culpability. Consequently, Mantashe's argument that the findings were based on mere assumptions appears likely to fail under a rationality review.

Ultimately, it does not seem that a judicial review of the Zondo Commission's findings by Mantashe will be successful. However, it could have significant political implications.

Political implications

Mantashe's proposed challenge to the Commission undermines the ANC and President Ramaphosa's promises that the party is being renewed, and is committed to weeding out corruption. It could also incentivise ANC members to undertake a Stalingrad legal defence strategy to every finding that implicates them, weakening the authority and function of the COI.

Furthermore, Mantashe's challenge undermines political accountability. He has reasoned that the ANC's step-aside principle does not apply to him, because he has not been criminally charged by the NPA.

The ANC adopted its step-aside resolution at the 2017 Nasrec conference as an internal party rule. Any members facing criminal charges for corruption must voluntarily step aside from their position in the party after various processes have been followed. However, this rule only applies to those members already charged by the NPA, making it difficult for the President to take any decisive action against political appointees implicated by the COI's findings. In 2021, now suspended ANC Secretary-General, Ace Magashule, even tried to constitutionally challenge this rule in the High Court, arguing that it infringed his constitutional right to be presumed innocent.²¹ The Court held that the rule did not contravene the Constitution.

Yet, ironically and not in the way he intended, Magashule may have had a point when he argued that the "outsourcing" of political accountability to the NPA is absurd.²² Making the rule on *political* accountability entirely dependent on the capacity and inclination of the NPA to hold someone *legally* accountable may be ineffectual by setting the bar of political liability too low.

Mantashe's refusal to step aside on the basis of these legal technicalities, despite the Commission's investigatory findings of a "reasonable suspicion" of corruption against him, has been criticised by Pierre de Vos as conduct promoting "the judicialisation of public morality".²³ The electorate cannot rely purely on the dysfunctional criminal justice system to hold public figures accountable – a system that has been deliberately weakened to protect politicians from prosecution. There has to be political accountability if legal accountability fails. And surely the continued leadership of those in cabinet should depend on a higher standard than criminality "beyond reasonable doubt"? How can the ethical bar for the country's leaders be set so low?

The ANC should not use the technicalities of the step-aside rule to avoid political accountability in the face of COI findings. It must be noted that the objective of a COI is to investigate and publicise the truth. It is not a court of law, so accountability in terms of its finding should not hinge on guilt beyond reasonable doubt. As argued by de Vos, "criminal guilt is not and should not be the yardstick the public use to assess the fitness of politicians and other public figures to hold any position of authority". Making the step-aside rule entirely dependent on the capacity and inclination of the NPA to charge someone may be too conservative, especially given the number of ANC members implicated in the State Capture Inquiry, Ramaphosa's promise to weed out corruption, and general public dissatisfaction with both the NPA and ANC as inherently unaccountable institutions.

Raising the threshold of political accountability by extending the step-aside rule to those officials against whom there is a reasonable suspicion of criminality as found by a COI, need not promote a "trial-by-media" nor undermine fair judicial process. The Commission's findings are based on extensive investigation, and are neither sensationalist nor baseless claims. Implicated ANC officials would in no way be denied their fair trial rights, since political/party accountability and

²¹ *Magashule v Ramaphosa* [2021] 3 All SA 887 (G).

²² <https://www.news24.com/southafrica/news/why-is-anc-outsourcing-its-step-aside-rule-to-npa-magashule-asks-in-court-papers-20210615>

²³ <https://constitutionallyspeaking.co.za/on-being-implicated-in-the-state-capture-report-and-the-judicialisation-of-public-morality/>



Former South African president Jacob Zuma speaks to members of his legal team during a break in proceedings at the Commission of Inquiry into State Capture, in Johannesburg, on July 19, 2019

legal accountability are distinct. The ANC should still make substantive and procedural fairness the driving force of the step-aside procedure. The Integrity Commission should formulate fair and comprehensive criteria for determining whether there is sufficient evidence to raise a reasonable suspicion of criminality such that the official should no longer serve in the party. Each implicated member must still be given a chance to make representations.

The inefficacy of the step-aside rule is becoming increasingly evident. Bathabile Dlamini, the ANC Women's League President, was found guilty of perjury but has refused to step aside. There has been doubt as to her fate within the ANC, given that the step-aside rule is silent on the consequences for criminally charged leaders who are given the option of paying a fine instead of a prison sentence.²⁴ This is simply another example of the use of legal technicalities to avoid political accountability. The rule also does not explicitly forbid criminally charged leaders, who have been forced to step aside, from running for positions and getting re-elected *in absentia*. This was the case for Mandla Msibi, charged with double murder and out on bail, who was elected as Mpumalanga's provincial treasurer *in absentia*. Yet, he has since been ordered by the party not to occupy office. It remains to be seen how the party responds to corruption-charged Zandile Gumede, who has recently accepted

nomination *in absentia* to run for the position of regional chairperson of the ANC in eThekweni.

Politically, only the ANC can hold its members accountable. This is attributable to our proportional representation system and a one-party-dominant legislature. Since voters elect a party, and the party then elects its candidates from a closed list, voters cannot hold members of parliament individually accountable. The electorate can only show their displeasure towards parties themselves during elections. The people of South Africa depend entirely on the leading party to hold its individual members politically accountable. The ANC's step-aside rule needs to fulfil this responsibility more effectively.

Evidently, the quandary created by the Commission's findings against Mantashe raises interesting questions concerning legal versus political accountability, and sheds light on the possible inadequacies of the ANC's step-aside rule. Political accountability should not be overlooked in favour of legal accountability. Politicians' positions of leadership, especially those in Cabinet, should depend on a higher standard than that faced by criminals on trial. However, strengthening the step-aside rule to include findings of reasonable suspicion by a COI need not undermine the fundamental role of fair process.

24 <https://www.businesslive.co.za/bd/politics/2022-04-10-political-week-ahead-a-test-for-ancs-step-aside-rule/>



JOHANNESBURG, SOUTH AFRICA: African National Congress (ANC) outgoing Secretary General, Gwede Mantashe leaves a media briefing following the African National Congress (ANC) 54th National Conference on December 16, 2017 in Johannesburg. South Africa's ruling African National Congress holds its 54th national conference from December 16 to 20, 2017, with the party expected to elect its new leader who will probably become the country's next president.

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