

**SOCIAL JUSTICE MOVEMENTS & ORGANISATIONS PROPOSE
AMENDMENTS TO REGULATION 36 OF THE ALERT LEVEL 3 LOCKDOWN REGULATIONS
REGARDING EVICTIONS**

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3 June 2020

To: THE PRESIDENCY: NATIONAL COMMAND COUNCIL

c/o: Ms Khusela Diko & Mr Mike Louw

Per Email: khusela@presidency.gov.za
presidentrsa@presidency.gov.za

And To: SPEAKER OF THE NATIONAL ASSEMBLY HONOURABLE THANDI MODISE

c/o: F Ramosana

Per Email: framosana@parliament.gov.za

THE MINISTER OF JUSTICE & CORRECTIONAL SERVICES: MINISTER RONALD LAMOLA

c/o: Ms Zanele Ndlovu and Mr Bruce Sarela

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THE MINISTER OF COOPERATIVE GOVERNANCE AND TRADITIONAL AFFAIRS: DR NKOSAZANA DLAMINI ZUMA

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THE MINISTER OF RURAL DEVELOPMENT AND LAND REFORM: MINISTER THOKO DIDIZA

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THE MINISTER OF HEALTH: DR ZWELI MKHIZE

c/o: Mr Popo Maja

Per Email: popo.maja@health.gov.za

Dear Honourable President Ramaphosa, Honourable Speaker Modise and Honourable Ministers,

RE: AMENDMENT TO REGULATION 36 OF THE ALERT LEVEL 3 LOCKDOWN REGULATIONS REGARDING EVICTIONS

1. We write to you on behalf of the undersigned movements and organisations working with and in support of the working class, poor and vulnerable to recommend amendments to Regulation 36 of the regulations

issued in terms of section 27(2) of the Disaster Management Act, 2002 on 28 May 2020 detailing Alert Level 3 of the Risk Adjusted Strategy (“Alert Level 3 Regulations”).¹

2. This correspondence follows a letter addressed to the Presidency and the National Command Council from 27 social justice movements and organisations dated 20 March 2020, in terms of which an urgent moratorium on the issuing and execution of all eviction orders during the declared State of National Disaster was proposed. This proposal was made in recognition of South Africa’s national lockdown and stay at home policy in order to curb the spread of COVID-19, as well as the dire situation that many households threatened with evictions would face - being at a heightened risk of infection. A copy of the 20 March 2020 correspondence calling for the moratorium on evictions is attached for ease of reference.
3. The Government, in line with international good practice,² instated a prohibition on evictions under the Directions issued by the Minister of Justice and Correctional Services. Importantly, section 5(f) of the Directions issued on 26 March 2020 confirmed the importance of the home as the frontline defence against COVID-19 by providing that “all evictions and execution of attachment orders ... and sales in execution are suspended with immediate effect”. Subsequent Directions issued by the Minister on 31 March 2020 further provided that “the service and execution of other process by Sheriffs, including evictions, are not essential, and are suspended for the duration of the lockdown.”³

Entry into Alert Level 3

4. President Cyril Ramaphosa in his 24 May 2020 address to the nation, acknowledged that “...the risk of a massive increase in infections is now greater than it has been since the start of the outbreak in our country” and that we are at a period where the rates of infection are predicted to rise rapidly.⁴
5. On 28 May 2020, the Minister of Cooperative Governance and Traditional Affairs, Dr Nkosazana Dlamini Zuma announced the amendments⁵ to regulations⁶ under section 27(2) of the Disaster Management Act, 2002 and issued the Alert Level 3 Regulations. Honourable Minister Dr Dlamini Zuma stressed that despite the national migration to Alert Level 3, South Africa will remain in a state of lockdown until a

¹ Published under GN 608 of 28 May 2020.

²See UN Special Rapporteur, Farha L. (18 March 2020) “Housing, the front-line defence against the COVID-19 outbreak”. Available at https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25727&LangID=E&fbclid=IwAR3tXO7gwDlq6Z11wI0T_BLxrR_EiEr-4DEg0eRt2BTpZWCfw7Ej5wTLfdY.

³ Section 5(d) of the Directions issued in terms of Regulation 10 of the Regulations under the Disaster Management Act, 2002.

⁴ President Cyril Ramaphosa: Developments in South Africa’s risk-adjusted strategy to manage the spread of Coronavirus COVID-19, 24 May 2020. Available at <https://sacoronavirus.co.za/2020/05/24/address-by-president-cyril-ramaphosa-on-south-africas-response-to-the-coronavirus-pandemic-24th-may-2020/>.

⁵ Published under GN 608 of 28 May 2020.

⁶ Published under GN R480 of 29 April 2020.

sustained period of containment of COVID-19 can be demonstrated.⁷ Honourable Minister Dr Dlamini-Zuma went on to state that:

“These coming phases also confirm prevention as a corner stone of our response. It is only healthy communities and individuals that can drive our recovery plan, on the other side of the infection curve. We must also remain cognisant of the ever-present danger of reversing the gains we have thus far recorded.”⁸

6. The preservation of life and the prioritisation of a preventative response under the continued state of lockdown necessitates that the home continues to be the primary defence against COVID-19 for all in our country. This is so particularly at a time when the rate of infection has increased and is projected to continue increasing, and so access to a home has proven to be a significant part of remaining or getting healthy as in instances of self-quarantine or self-isolation. Where one loses access to their home, one cannot sufficiently protect themselves or their community from the risk of contracting and transmitting COVID-19 and other communicable illnesses including respiratory illnesses and illnesses leading to immunodeficiency.⁹ Housing, at this critical point, is healthcare.¹⁰

Regulation 36 and International Human Rights Obligations

7. Regulation 36 of the Alert Level 3 Regulations maintains some prohibition on the execution of evictions until the end of Alert Level 3 by providing as follows:

“36. (1) Subject to sub regulation (2), a person may not be evicted from his or her home during the period of Alert Level 3 period.

(2) A competent court may grant an order for the eviction of a person from his or her land or home ... provided that an order of eviction may be stayed and suspended until the last day of Alert Level 3 Period, unless a court decides that it is not just and equitable to stay and suspend the order until the last day of the Alert Level 3 period.”

⁷ Media briefing by Dr Nkosazana Dlamini Zuma, Minister of Cooperative Governance and Traditional Affairs Level 3 in line with the Risk-based approach to contain the Spread of COVID-19, 28 May 2020. Available at <https://sacoronavirus.co.za/2020/05/28/minister-nkosazana-dlamini-zuma-coronavirus-covid-19-level-3-lockdown-regulations/>.

⁸ Id.

⁹ Lack of housing and the overcrowding found in temporary housing for the homeless also contribute to morbidity from respiratory infections and activation of tuberculosis. See for instance Wood DL, Valdez RB, Hayashi T, Shen A. (1990) “Health of homeless children and housed, poor children.” *Pediatrics*.;86:858–866; Zolopa AR, Hahn JA, Gorter R, et al.(1994) “HIV and tuberculosis infection in San Francisco's homeless adults. Prevalence and risk factors in a representative sample.” *JAMA*.272:455–461; Kermode M, Crofts N, Speed B, Miller P, Streeton J.(1999) “Tuberculosis infection and homelessness in Melbourne, Australia, 1995–1996.” *Int J Tuberc Lung Dis*.3:901–907.

¹⁰ See World Health Organization. (1989). “Health principles of housing”. World Health Organization for some of the principles underlying this tenet.

8. However, the prohibition under Regulation 36 is substantially limited by the discretion of the courts who are empowered to order evictions and the execution thereof during Alert Level 3 should it be deemed just and equitable. The departure from the blanket prohibition of evictions under Alert level 5 is inconsistent with Honourable Minister Dlamini Zuma's recognition that "COVID-19 has hit hard on all South Africans, particularly those who are vulnerable and homeless ... we cannot afford to have many more in the streets." Further, it is inconsistent with the United Nation's COVID-19 Guidance Note on the prohibition of evictions as issued by the UN Special Rapporteur on the Right to Adequate Housing.¹¹
9. The Guidance Note cautions that "in the face of this pandemic, being evicted from your home is a potential death sentence"¹² and requires states to, *inter alia*, urgently and in conformity with their obligations under human rights law:

"Declare an end to all evictions of anyone, anywhere for any reason until the end of the pandemic and for a reasonable period of time thereafter. The only exceptions to this blanket policy should be where someone must be removed from his or her home because she or he is causing harm to others or in situation of a serious threat to the life of residents, e.g. to prevent death provoked by housing collapses or by natural disasters, such as flooding. Any person that is evacuated to prevent harm must be provided with secure and decent alternative housing."

and with respect to informal settlements,

"Declare an end to the forced eviction or displacement of informal settlements. Ensure the necessary resources are available to implement this order effectively, including resources to monitor and prevent extra-judicial evictions."

10. This underpins the Special Rapporteur's view that evictions are not only inconsistent with orders to stay at home, but forced or unlawful evictions are a violation of international human rights law, including the right to housing, as are any evictions that result in homelessness.¹³

¹¹ Farha, L. (28 April 2020) "COVID-19 Guidance Note: Prohibition of evictions." United Nations Human Rights Special Procedures.

¹² Farha, L. (28 April 2020) "COVID-19 Guidance Note: Prohibition of evictions." United Nations Human Rights Special Procedures.

¹³ See Committee on Economic, Social and Cultural Rights, General Comment No. 7 on forced evictions at para 16.

11. This position has been reinforced by the UN Committee on Economic, Social and Cultural Rights' call for a "moratorium on evictions" and "mortgage bond foreclosures against people's homes during the pandemic" in its statement on COVID-19 issued on 17 April 2020.¹⁴
12. The rationale of preventing the spread of COVID-19 through limiting movement cannot be said to apply when many households are at the risk of extra-judicial evictions and now, evictions ordered by the courts.
13. The risk of exposing families to the virus is exponentially increased where households stand to be evicted into homelessness as most would have no alternative due to income insecurity and economic hardship imposed by the pandemic and subsequent restrictions.

Regulation 36 and the Protection of Rental Income

14. The rationale offered for the insertion of a possibility of a court ordered eviction to be executed under Alert Level 3 is that rental income constitutes an important means of income for some.¹⁵ This is an important consideration given the devastating effects that the pandemic has had on incomes and livelihoods. And so, while we acknowledge the reality of these competing interests, we are concerned that the considerations underpinning the rationale are imbalanced and pose a risk of being abused to the detriment of many facing the double threat of income insecurity and resultant tenure insecurity. The rationale also does not address the potential eviction of those who have occupied land or buildings and where no rental is paid (for example, the eviction of informal settlement residents).
15. Phased recovery cannot only be applicable to the economy. The economy comprises people, workers who may, until now, have been unable to work or continue to be prohibited from carrying on their business under Alert Level 3 meaning a continued lack of income. Tenure insecurity brought about by economic consequences of the pandemic should not result in one having to choose between feeding one's family and maintaining the first line of defence against the spread of the COVID-19 – this being the home. As the UN Committee on Economic, Social and Cultural and Cultural Rights has indicated, South Africa is required to provide "social relief and income-support programmes to ensure food and income security to all those in need" in addition to ensuring protection of tenure security during the pandemic.¹⁶

¹⁴ E/C.12/2020/1 available:

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2f2020%2f1&Lang=en.

¹⁵ Media briefing by Dr Nkosazana Dlamini Zuma, Minister of Cooperative Governance and Traditional Affairs Level 3 in line with the Risk-based approach to contain the Spread of COVID-19, 28 May 2020. Available at <https://sacoronavirus.co.za/2020/05/28/minister-nkosazana-dlamini-zuma-coronavirus-covid-19-level-3-lockdown-regulations/>.

¹⁶ E/C.12/2020/1 available:

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2f2020%2f1&Lang=en.

16. For context, according to the 2018 General Household Survey, around 46% of South Africans live in rented accommodation and 8,3% of households that lived in a formal dwelling were still paying off mortgages. While some credit lenders have offered some reprieve to homeowners in the latter category, no provision has been made for those who need to make monthly rental payments, in this context, to safeguard their health. We acknowledge and commend some of government's social assistance efforts, however, the fact remains that the forms of distress relief or unemployment support fall short in light of the compounding costs of being able to retain access to one's home.
17. To address this, the UN Special Rapporteur on the Right to Adequate Housing has issued a Guidance Note on protecting renters and mortgage payers which implores states to adopt a principled policy approach to the rent and income tensions laid bare by the pandemic.¹⁷ This Guidance Note directs states to adopt the following principles:¹⁸
- 17.1. the burden of the response to the pandemic must be shared across society in a fair and equitable manner;
- 17.2. renters and homeowners – whether in informal or formal markets – must not emerge from the pandemic overburdened with housing related debt as a result of financial and economic circumstances created by the pandemic; and
- 17.3. the financial burden shouldered by banks, financial institutions, corporate landlords and other financial actors must be proportionate to their resources.
18. States are further advised to implement specific measures to ensure that tenants and mortgage payers are able to comply with stay at home directives and not face displacement and financial ruin. This includes measures to:

*“Prohibit evictions and the threat of eviction (e.g. legal notice to evict) due to arrears of rental, mortgage or utility payments during the pandemic period and for a reasonable period thereafter. Evictions or foreclosures scheduled before the pandemic commenced must be suspended. Adequate monitoring mechanisms to ensure these prohibitions are adhered to must be established, including to prevent private actors from carrying out extrajudicial evictions.”*¹⁹

¹⁷ Farha, L. (8 April 2020) “COVID-19 Guidance Note: Protecting renters and mortgage payers.” United Nations Human Rights Special Procedures.

¹⁸ Id.

¹⁹ Id.

19. The honest acknowledgment that this public health crisis creates an undue burden of society is critical, yet what is of more importance is the recognition that the poor and tenure insecure cannot be made to bear the cost at the expense of their lives. This is a societal imperative, moreover in a society premised on substantive equality and the advancement of human rights and freedoms.
20. Allowing evictions and the possibility of their execution at this time under Regulation 36, in addition to continuing unlawful evictions, at a time when the number of infections is expected to rise dramatically, is not only an erasure of the significant gains made towards flattening the curve through a stay at home policy, it is a violation of international human rights tenets and potentially a derogation of the rights to life, health and security of person enshrined in our Constitution.

Enforceability of the Prohibition of Evictions and Access to Basic Services

21. Since the institution of the prohibition of evictions on 31 March 2020 (replacing the Directions initially issued on 26 March 2020), many people have been subjected to extra-judicial evictions and illegal demolitions of their homes by both state and private actors despite the legislative intervention. It is particularly concerning to witness state actors nullifying the National State of Disaster Regulations with impunity, leaving the defence of the vulnerable to non-state groupings and individuals.²⁰
22. The right to adequate housing is not subject to derogation in times of emergency. According to the Committee on Economic, Social and Cultural Rights, this right includes the availability of services, materials, facilities and infrastructure essential for health, security, comfort and nutrition.²¹ Any limitation of the right must be therefore necessary, proportionate and evidence based. It is concerning to note that during this time, where services such as water and electricity are key to the preservation of health, many tenants and ratepayers have experienced unlawful disconnections to these utilities and these deprivations are becoming more prevalent. This is in violation of the rights to water and the constitutionally recognised duty on municipalities to provide basic services including electricity, and in some instances, constitutes unlawful constructive evictions.

²⁰ For instance, see report from Abahlali baseMjondolo (29 March 2020) "Evictions Continue in Durban Despite the National Moratorium". Available at <http://abahlali.org/node/17041/>. See also Crawford A. & Ngubane N. (30 March 2020) "Covid-19: eThekweni accused of defying ban on evictions". Available at <https://www.groundup.org.za/article/covid-19-ethekwini-municipality-accused-defying-ban-evictions/> See also Majola N. (3 April 2020) "Covid-19: Shack demolitions continue in Durban despite moratorium plea". Available at <https://www.groundup.org.za/article/covid-19-shack-demolitions-continue-durban-despite-lockdown-plea/>.

²¹ CESCR General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant) Adopted at the Sixth Session of the Committee on Economic, Social and Cultural Rights, on 13 December 1991 (Contained in Document E/1992/23).

23. Therefore, the sustainable access to safe drinking water, energy for cooking, heating and lighting, sanitation and washing facilities should not be compromised during this time. Limitations to this right are only permissible as determined by law and in so far as they are compatible with the nature of this right, necessary, proportionate and solely for the purpose of promoting the general welfare in a democratic society.²² This should not be an opportunity for local authorities to prioritise financial benefit, property and the erasure of informality as this does not promote the society's general welfare. Instead, the inevitable slew of evictions only harms society through greater infection, a strain on public health services and death.

Recommendations

24. The current wording of Regulation 36 of the Alert Level 3 Regulations relating to evictions is at odds with the reality in most parts of the country. Not only does it fail to take into account the unchecked illegal demolitions by state actors and contracted private security as well as the persistent unlawful evictions of individual households, it also does not address the limitations on the enforceability of these regulations.
25. This call to reconsider Regulation 36 of the Alert Level 4 Regulations follows a submission by the Centre for Applied Legal Studies ("CALs") on 11 May 2020 supported by several public interest organisations to the President and Speaker to revise Regulation 19 of the Alert Level 4 Regulations and re-instate a full moratorium on the institution, hearing, and execution of evictions. A copy of the CALs submission is attached for ease of reference.
26. Importantly, the CALs submission of 11 May 2020 raised serious concerns around the possibility of evictions during Alert Level 4:

"Any execution of an eviction order during Alert Level 4 of the national lockdown could never be deemed 'just and equitable' by a court; the continued restrictions on inter alia movement and transport are underscored by the need to "Stay at Home", and thus necessarily render any eviction unjust in the current context. For this reason, the reference to this possibility in the Regulation is irrational and thus unlawful."

27. We submit that these concerns remain during Alert Level 3 primarily because South Africa is at a period where the rates of infection are predicted to rise rapidly²³ and so the need to "Stay at Home" will become

²² See Articles 4 and 5 of the International Covenant on Economic, Social and Cultural Rights.

²³ See President Cyril Ramaphosa: Developments in South Africa's risk-adjusted strategy to manage the spread of Coronavirus COVID-19, 24 May 2020. Available at <https://sacoronavirus.co.za/2020/05/24/address-by-president-cyril-ramaphosa-on-south-africas-response-to-the-coronavirus-pandemic-24th-may-2020/>.

an increasingly critical prevention measure, especially in declared Hotspot Areas. We re-iterate that the execution of an eviction order could never be deemed 'just and equitable' in this context.

28. While we underscore the need for the regulations to be amended to reflect a full moratorium on the institution and hearing of eviction proceedings, as well as the execution of eviction orders and all demolitions of homes for the entire duration of Alert Level 3, we remain cognisant of the fact that without an effective law enforcement mechanism, the rule of law during this state of disaster will continue to be undermined to the detriment of our most vulnerable being those with insecure tenure with compounding stressors which stand to exacerbate the public health crisis.
29. We accordingly recommend that Regulation 36 of the Alert Level 3 Regulations be replaced in its entirety by the following:

“36. Prohibition on evictions and demolitions of homes

(1) For the duration of the National State of Disaster:

(a) No person may have their home demolished or be evicted or otherwise removed from their place of residence, including in terms of the Extension of Security of Tenure Act 62 of 1997 or the Prevention of Illegal Eviction from and Unlawful Occupation of Land Act 19 of 1998, or whether by way of an extra-judicial process, regardless of whether it is a formal or informal residence or a farm dwelling; and

(b) No person may demolish any structure which has been or is being constructed for the purposes of residential occupation on any land or in any building.

30. We further recommend that the Directions giving effect to the above proposed amendment to Regulation 36 should expressly suspend the service and execution of evictions, attachment orders, and sales in execution with immediate effect for the duration of the National State of Disaster.²⁴
31. With regard to concerns about property owners' ability to receive rental income, the UN Special Rapporteur on the Right to Adequate Housing has issued a further COVID-19 Guidance Note that outlines practical steps to be taken by the state to alleviate both rental and rental income shortfalls due to the effect of the pandemic. These measures include:

²⁴ In line with section 5(f) of the Directions issued by Minister of Justice and Correctional Services, Honourable Minister Ronald Lamola, on 26 March 2020; and section 5(d) of the Directions issued by the Minister of Justice and Correctional Services on 31 March 2020.

- 31.1. Legislating a mandatory rent re-calculation by housing providers that caps the rent obligation of tenants to 30 per cent of their monthly income, including any social benefits received. In states that have a system of housing benefits or social transfer payments to cover housing costs, the level of such benefits and eligibility criteria should be reviewed to ensure that tenants affected by the crisis do not have to pay more than 30 per cent of their monthly net income on housing costs; and
- 31.2. Establishing a government compensation scheme for landlords to offset the difference between the pandemic rental cap rates and the rental rates that were in place prior to the pandemic. States could establish a social solidarity fund – funded through taxation schemes and levies on revenues from corporate landlords – to provide compensation or assistance particularly to smaller landlords, conditional on their offering of reduced rental payments to tenants.
32. We recommend that the state considers and adopts the principles outlined in both the UN COVID-19 Guidance Notes on the prohibition of evictions and protecting renters and mortgage payers as a balanced response to evictions during Alert Level 3, and throughout the National State of Disaster.
33. We further recommend that the Rental Housing Tribunal be capacitated with additional staff and resources to effectively assist with mounting complaints from both tenants and landlords.

Conclusion

34. We trust that these recommendations on Regulations 36 will be given urgent consideration in light of the issues raised in this submission, and in light of the court-ordered opportunity to review, amend and republish the Alert Level 3 Regulations.²⁵ For as long as the pandemic is with us, the above rationale cannot change. The right to life demands the protection of the home under any and all circumstances.

Yours sincerely,

The undersigned social justice movements and organisations:

²⁵ See *De Beer and Others v Minister of Cooperative Governance and Traditional Affairs* (21542/2020) [2020] ZAGPPHC 184 (2 June 2020). We note that while the Court excludes Regulation 36 from being an invalid regulation (at para 11.2), the issues relating to Regulation 36 and evictions raised in this submission were not before the Court, and as such, should not be excluded from consideration and amendment on this basis.



1. Ndifuna Ukwazi



2. Reclaim the City



3. Abahlali baseMjondolo



4. Socio-Economic Rights Institute (SERI)



5. Development Action Group



6. Land Access Movement of South Africa



7. Land & Accountability Research Centre



8. Legal Resources Centre



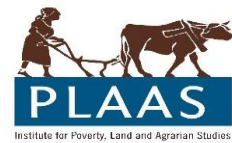
9. LandNNEs



10. Social Justice Coalition



11. Alliance for Rural Democracy



12. Institute for Poverty, Land and Agrarian Studies



13. Transkei Land Services Organisation



14. Phuhlisani NPC



15. Farmer Support Group



16. Rural Legal Trust



17. Centre for Applied Legal Studies



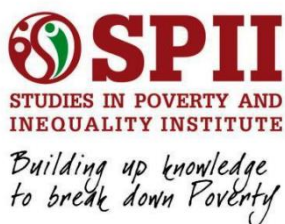
18. Stellenbosch Backyarders Forum



19. Equal Education



20. SECTION 27



21. Studies in Poverty and Inequality Institute

22. Lawyers for Human Rights

23. ProBono.Org

24. Alternative Information & Development Centre



The Housing Assembly



25. The Housing Assembly

26. South Durban Community Environmental Alliance

27. Association for Rural Advancement (AFRA)

28. Documentary Filmmakers Association



29. Extinction Rebellion South Africa



30. Independent Producers Organisation

31. Ubunye Bama Hostel

32. Wentworth Development Forum

33. Botshabelo Unemployed Movement

34. Poor Flat Dwellers Movement

35. KZN Subsistence Fisherfolks

36. Amandla Collective

37. Reunion Airports Farmers Association

38. Climate Justice Coalition

39. Keep Left

40. Nkosa Economic Socio Institute (NESI)

41. Austerville Project Committee