

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE NO. CCT 11/99

In the matter between :

THE DEMOCRATIC PARTY Applicant

and

THE MINISTER OF HOME
AFFAIRS N.O. First Respondent

THE ELECTORAL COMMISSION Second Respondent

SUPPLEMENTARY AFFIDAVIT

I, the undersigned

DAVID MAMABOLO

do hereby make oath and state that :

1.

1.1 I am the Director: Identity Documents of the Department of Home Affairs, the First Respondent in this matter. I am stationed at the Department's Identity Documents Processing Plant at 184 Jacob Mare Street, Pretoria.

1.2 /...

1.2 The facts deposed to in this affidavit are, unless otherwise stated or the converse appears from the context, within my personal knowledge and are both true and correct.

1.3 I have deposed to an affidavit in this matter and I am duly authorised to depose hereto.

2.

The green bar-coded Identity document issued by the Department of Home Affairs with effect from 1 July 1996 has the following features:

2.1 a scanner-readable bar-code which is linked to the Identity number;

2.2 thirteen-digit Identity number which is made up as follows :

2.2.1 first six (6) digits represent date of birth by reflecting the year, month and date of birth;

2.2.2 the seventh (7th) digit indicates sex of the holder allocated as follows -

0 - 4 represents females

5 - 9 represents males

2.2.3 the next three (3) digits are control numbers i.e. the population register accommodates 10 000 individuals of the same date of birth in

total. The numbers will consequently revolve per Identity Number issued up to 10 000. Should there be more than 10 000 people born on the same date, the 12th number which is normally 8 will change to 9 which will have the effect of unlocking the series to commence from 0 to can register as many other numbers up to 10 000. (This rarely happens as it is unlikely there will be 10 000 or more births on the same date;

2.2.4the eleventh (11th) digit indicates citizenship i.e. 0 will represent South African citizen and 1 will represent a non-South African i.e. those that have acquired permanent residence;

2.2.5the thirteenth (13th) digit is a control number allocated by the computer in the process.

2.3Underneath the Identity number as appears on the Identity book will appear words "South African" or "Non-South African" which must correspond with /...

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with the 11th digit as described in 2.2.4 above.

2.4The Identity printed letters indicating name(s), surname, country of birth and the dates must all be in the same font.

2.5The date of birth on the Identity book must correspond with the Identity number save for the digits indicating the century e.g. 18____ or 19_____.

2.6The photograph of the holder is affixed to the left bottom square of the first page, which is entirely hot-laminated with a transparent strip which will have two green coat of arms covering the top and the bottom of the photograph and the other two will lie somewhere on the page. This feature facilitates detection of any form of tampering with the photograph.

2.7The fourth (4th) page is also fully hot-laminated with a transparent strip having four (4) green code of arms. The fourth page has Identity number, surname and initials as well as particulars of the holder's drivers licence.

The /...

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The hot-lamination on the first and fourth pages will ensure that any tempering therewith will disturb the writing on the page and any writing over it will be easily detectable.

2.8The Identity book has eight (8) pages.

2.9The prerequisite for the issuance of the Identity book is the taking of the fingerprints which must be classified and included with the holder's particulars in the population register.

3.

The green bar-coded Identity book differs from all the other South African issued and the TBVC states Identity books in that -

- 3.1it does not have race classification;
- 3.2it does not have marriage particulars;
- 3.3it does not have ethnic group classification;
- 3.4the lamination strip on the others is not hot-fixed and has no coat of arms.

4. /...

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4.

The green un-bar-coded Identity book was introduced in 1980 and has sixteen (16) pages. The Identity number indicates the race of the holder e.g. twelveth (12) digit of the Identity number will be -

- 0 - White
- 1 - Coloured
- 2 - Malay
- 3 - Griqwa
- 4 - Chinese
- 5 - Indian
- 6 - Other Asians.

Africans would not be issued with this Identity book.

This Identity book also contained the following details:

- 4.1 - marriage particulars
- 4.2 - tax status of the holder
- 4.3 - fire-arm licences.

5.

The blue Identity book was introduced from February 1972 and was issued to

Whites /...

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Whites, Coloureds and Asians only. It had race classification which was indicated as in the green un-bar-coded Identity book. It had, in addition, particulars of immunisation. It was hard covered and is bigger in size than the green one. It has a blue cover. As with the green Identity books it has the inscription in gold "IDENTITY DOCUMENT".

6.

The green card was issued from 1950 and was issued to Whites, Coloured and Indians and was green with a hard plastic covering. The photograph of the green card is imprinted on the top left hand corner. The Identity number appears on the right of the photograph and consisted of nine (9) digits followed by a letter W for Whites, K for Coloured and I for Asians. The sex of the holder e.g. Manlik/Male is printed in the middle of the card. The surname followed by initial(s) are printed beneath the photograph.

7.

The Reference Book (Dompas) was issued since 1952 exclusively to Africans. The particulars of the holder were printed on a sticker with a green background which was affixed on the last page. The Reference book indicate ethnic grouping, the reference book number consisted of nine (9) digits which were made up as follows :

7.1 /...

7.1the first (1st) indicated sex i.e. 1 for male and 5 for female which is followed by a hyphen (-).

7.2the next seven digits consisted of a unique serial number.

7.3the last number preceded by a hyphen (-) is a control number.

The photograph of the holder is embossed with the code of arms. It contained details of residence, employment and tax status. A married female one would have to be endorsed with the particulars of the husband.

8.

The TBVC states Identity books did not have Identity numbers but serial numbers of the books issued. The particulars of the holder are handwritten in the book. People that lived in the respective TBVC States prior to their independence would have had Reference Books. Most people were moved into those areas being holders of Reference Books. Some areas of the Republic were simply declared to be part of the TBVC States without moving the people. Some of these people would have their particulars in the population register of the Republic. Only the people that attained the age of acquiring an Identity book living in those areas after their

independence /...

independence would not appear on the population register of the Republic, their birth was registered in the Republic.

9.

The use of a scan-readable bar-code eliminates human error in punching in ID-numbers and is more reliable as the bar-code is linked to only one ID-number and thus eliminates duplication and fraud and can also be verified. The fingerprint prerequisite to the issuance of the bar-coded ID is the most reliable as it reduces the risk of allocating multiple ID-numbers and consequently ID books to one person. None of the other ID books had fingerprinting as a requirement except the Reference Book.

D MAMABOLO

I certify that the Deponent has acknowledged that he knows and understands the contents of this affidavit, that he has no objection to the taking of the prescribed oath and that he considers this oath to be binding on his conscience.

SIGNED / ...

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SIGNED and SWORN to before me at PRETORIA on this
day of 1999.

COMMISSIONER OF OATHS

FULL NAMES:

CAPACITY:

BUSINESS ADDRESS:

AREA: