

F/S

SAAKNOMMER: CC 482/85

PRETORIA

1987-08-17

DIE STAAT teen:

PATRICK MABUYA BALEKA EN 21

ANDER

VOOR:

SY EDELE REGTER VAN DIJKHORST EN

ASSESSOR : MNR. W.F. KRUGEL

NAMENS DIE STAAT:

ADV. P.B. JACOBS

ADV. P. FICK

ADV. W. HANEKOM

NAMENS DIE VERDEDIGING:

ADV. A. CHASKALSON

ADV. G. BIZOS

ADV. K. TIP

ADV. Z.M. YACOOB

ADV. G.J. MARCUS

TOLK:

MNR. B.S.N. SKOSANA

KLAGTE:

(SIEN AKTE VAN BESKULDIGING)

PLEIT:

AL DIE BESKULDIGDES: ONSKULDIG

KONTRAKTEURS:

LUBBE OPNAMES

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THE COURT RESUMES AT 14h00 ON 1987-08-17:

POPO SIMON MOLEFE, still under oath:

FURTHER CROSS-EXAMINATION BY MR JACOBS: The next exhibit I want to refer you to, Mr Molefe, in this regard is "E1".

COURT: Where was this document found?

MR JACOBS: In the UDF offices in Johannesburg.

Have you got it? -- I have got it.

This is the minutes of a National Executive Meeting of the UDF held on 5 and 6 November 1983. -- That is correct.

And you attended that meeting? -- That is so. 10

And are you instrumental in compiling this report or the minutes? -- I compiled the report, the minutes.

Now, will you have a look at paragraph 6.1.6.4 under the heading "Conscription". Have you got it? -- That is so.

Will you read that paragraph please? --

"The Western Cape region was instructed to form a commission on the question of conscription. It was decided that the youth organisations affiliated to the front be encouraged to spearhead the campaign. The general secretary was instructed to make available to the Western Cape region all affiliated youth groups." 20

MR JACOBS: So Mr Molefe, I put it to you that this is in line with the principle that the general office and national office will be responsible for initiating campaigns, and it initiated this campaign against conscription? -- I do not understand it that way.

And I put it to you further that it is also in line with the principle that it is the regions who must carry out and co-ordinate and see that the campaign is carried out/... 30

out? -- This is not set out here. In fact, to the contrary. What this thing says is that a suggestion is made that affiliates, youth affiliates be encouraged to take up the campaign. It does not even say the regions must do that. If that is put on the basis of what is written here, it is incorrect.

But that is a principle. We had it this morning, the principle is that campaigns will be initiated by the national offices. Is that correct? -- I did not accept that as a general principle. I said there are those campaigns which would have originated in the national office by way of the discussions starting at the level of the NEC. There are others which do not necessarily come from the NEC. So that that cannot be taken as a general principle. 10

And it was decided here on this, that there must be such a campaign and it was the youth organisations encouraged to be the spearhead of this campaign? -- That is correct, but whether the campaign was implemented is another story. A decision may be taken, but until that decision has been implemented, one cannot even begin to talk of it as a campaign. In principle that has been accepted. 20

And furthermore instructions were issued to you to make available to the Western Cape region all affiliated youth groups? -- That is correct.

Did you do that? -- I did not do it.

Why not? -- Well, because of the overload of work, and also because of lack of proper response from the regions. I personally could not go out to each affiliate. I relied on the regions to do it.

But there was an instruction issued to you as the general/... 30

general secretary? -- That is correct.

Is it correct that you kept lists of all the youth organisations in your offices? -- Well, I would have a list as at the time of the launch. The new ones I would not have. They would be in the regions, and in any event, those as at the time of the launch were in the possession of each region of the UDF at that stage.

Mr Molefe, will you agree that the regions would not be in possession - the Western Cape would not be in possession of the affiliated youth groups in the Transvaal? -- 10  
They have that, in the sense that the list of those organisations which attended the national launch was available to all the regions.

But the important factor is that it was decided by the UDF National to have a campaign on conscription? -- That is correct. That of course would be also dependent on the findings of the commission set out in the first line of the paragraph, the first and second line of the paragraph, the first sentence of the paragraph.

And were committees eventually - anti-conscription 20  
committees eventually appointed? -- They were formed in certain regions.

Now, in the Transvaal, I understood your evidence this morning, there was a committee in the Transvaal? -- There was.

Did it take up matters regarding this campaign? -- From what I could understand they had been holding discussions on that.

Do you know whether any workshops were held in regard to the anti-conscription question? -- I believe they did 30  
hold/...

hold workshops, but I never attended any of the workshops.

And the purpose of that workshop I suppose must have been carrying out the campaign? -- I believe the purpose would be really to clarify those who were present, to clarify themselves on the issues relating to conscription, and I believe possibly also to investigate the best way in which - first whether it is possible to take up that campaign, and if so, how to take it up, and what is the kind of structure through which that campaign could be conducted and so on. I think they would have really discussed those kinds of issues, but as I say, I was not present at any of those workshops. 10

I would like you to have a look at EXHIBIT "S2", paragraph 3.3.

COURT: Where was this document found?

MR JACOBS: This one was found, item 31, UDF Johannesburg documents. This is the minutes of a regional executive committee meeting held on 8 December 1983? -- That is correct. 20

Now, in paragraph 3.2.3 it seems as if the Transvaal Regional Committee Executive accepted that there must be an anti-conscription campaign. Do you agree? -- It may well mean that, but what I understand this to be is actually a rough agenda for the PE conference. 30

Well, according to this there is an anti-constitution campaign? -- That is correct. According to this the anti-constitution campaign was going to be discussed, and the million signature campaign was going to be discussed.

And the anti-conscription campaign was going to be discussed? -- Yes, so that really one cannot say that these campaigns/... 30

campaigns were - in fact they were not there because at this stage the UDF had not taken a decision, a final decision even on the question of the million signature campaign. It was a matter that was still being discussed in the region. What happened here is, the secretariat discussed these issues and the Transvaal secretary is giving a report to this REC, Regional Executive Committee meeting, a report of the discussions of the national secretariat, and he says to them, amongst the issues discussed was the proposed agenda for the PE conference, and we suggest these things as the agenda for the conference. It does not follow that those campaigns had taken place. In fact Your Lordship will realise that the decision in respect of the million signature campaign is really finalised at the conference in PE in December, on 17 and 18 December.

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And I put it to you, it is an accepted fact here by the Transvaal that there will be a campaign on anti-conscription. -- That there is that intention, there is the desire to take up conscription as a campaign.

And what is more, this emanates from a report from the national secretariat? -- That is correct.

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And it was even accepted by you people that there will be in the national secretariat, there will be a campaign, anti-conscription campaign? -- That the issue of conscription needed serious attention, because it was, as I pointed out, at the heart of the proposals for the tri-cameral parliament. And this matter is covered - I cannot offhand remember the exhibit, but in any event the minutes of this conference in PE would give an indication of how the issue of conscription was handled at that level.

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I/...

I would like you to have a look also at EXHIBIT "T25" page 5, paragraph 5.

COURT: Where was this document found?

MR JACOBS: It was found with a person by the name of Daniel Nkosi of Ratanda. Do you know Mr Daniel Nkosi of Ratanda, Mr Molefe? -- I do.

What is he? What is he doing? What is he in any of the organisations affiliated to UDF? -- He is a member of the Ratanda Civic Association, but I am not certain of that civic association was an affiliate of the UDF. 10

Can you tell the Court, Mr Molefe, is the secretariat report also sent to all the affiliated organisations? - Which secretarial report?

From the UDF, any secretarial reports? -- I do not know. My duty as the national office is to make available my reports to the regions of the UDF. They may well of course send it to their affiliates, but this one is not the report of the national secretary.

And do you know if it is policy of the UDF that regional secretarial reports be circulated among the affiliated organisations? -- I do not know, but I would be surprised if that did not happen because these anyway are important documents that the affiliates should know about. 20

This document according to the heading of it is UDF Transvaal secretarial report to the annual general meeting held on 9 March 1985. -- That is so.

Now, will you read paragraph 5? --

"The political and economic crises facing the apartheid state was evident by 1982."

MR JACOBS: I do not know if we have got it. EXHIBIT "T25". 30

-- That/...

-- That is what I am reading. I thought I was required to read page 1.

Page 5 paragraph 5. -- Page 5 has got no paragraph 5 - I see, item 5.

"A program of action for the UDF has begun to take shape in the following issues and campaigns: the unchair oppression and release our leaders campaign; the cost of living issues; the anti-conscription campaign; the anti-forced removals campaign; the development of organisation in rural areas and the campaign to bring the Black Local Authorities, the tri-cameral parliament and the Bantustan governments to a halt. We go forward confidently with the knowledge that not many more of our AGM's will be held under apartheid rule."

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MR JACOBS: According to this it is accepted and it is a fact in the Transvaal region that there is a campaign against - an anti-conscription campaign, there is an anti-conscription campaign going. -- I do not know if the writer intended this to mean that. He says the program of action for the UDF has begun to take shape in the following issues and campaigns. It may well be that they meant that there were discussions to develop a program of action on those issues.

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On those campaigns and issues? -- What he calls issues and campaigns. It may well be he meant that, but that does not change the position that I have presented to this Court, that as far as I am concerned, there was no anti-conscription campaign by the UDF in the sense that I defined my understanding of campaigns.

ASSESSOR (MR KRUGEL): What is a campaign, Mr Molefe? -- Well, I had said in the context of the UDF, campaign would

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be/ ...

be a defined activity of the UDF co-ordinated nationally by the UDF with predetermined goals.

Yes, I do not think we are on the same wavelength. What do you understand under the word "campaign"? -- As I say, it is a particular activity, activities focussing on a particular issue, as the main issue that the UDF is gearing its effort towards, and it is co-ordinated by the UDF, and it has predetermined goals. It has set out goals that the UDF wants to achieve through that kind of campaign. Let us take the million signature campaign for instance. We set out to collect a million signatures, and we co-ordinate that campaign, and we say as part of that campaign we would like to win new members and strengthen organisations.

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COURT: Could I just pause there? A campaign, could that not conceivably be a regional campaign and still be a campaign? -- It may well be, but then that cannot be said to be a UDF campaign.

Well, why not if it is co-ordinated by the Transvaal region of the UDF? -- On behalf of the UDF.

The Transvaal region of the UDF and it is under the banner of the UDF, would it then be a campaign if it is not a national campaign? -- It may be a regional campaign.

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So a campaign in itself is not necessarily a national one? A campaign can be a regional campaign as well? -- That is correct. That is why I said in the context of the UDF National. Those campaigns where I would have to do with the co-ordination and so on. There may be other localised issues.

And are you and counsel not at cross-purposes? When counsel speaks of a campaign it seems to me that he intends

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to/...

to refer to an activity, a defined activity by the UDF which may either be regional or local or national, provided it has the stamp of approval of the UDF on it, whereas you call a UDF campaign a nation-wide campaign co-ordinated and run by the UDF? -- That is so, but even at that level of the region, then we should be able to show the co-ordination of that campaign, how the goals were defined and so on.

Now, is it not possible that the Transvaal had a campaign against conscription whereas the National UDF still had it in the planning stage? -- Well, my understanding is that in fact all of them were in the planning stages, even when you look at for instance the Western Cape which was fairly advanced than any of the regions, itself, it was not able to conduct that as a UDF campaign, and in fact the documents which purport to be minutes or reports of the Western Cape indicate that the problems of building that into the UDF were, they did not know whether it should be done by the General Council of the UDF at that level or a separate structure, and that separate structure would not amount to the reproduction of the General Council. There were all those problems which remained unsolved, unresolved. It is true that there was the intention to take up that campaign, and I think the exhibit that was presented here as "C53" accurately reflects the situation.

MR JACOBS: Mr Molefe, who was co-ordinating the campaign against the new constitution? -- A special committee was set up for that.

Yes, and before that? -- It was done through the national office.

And not through the Transvaal region? -- Well, in respect/...

respect of regional activities, but it was a national campaign, it had to be co-ordinated nationally.

But is it not in line with what we have seen this morning according to EXHIBIT "C53", that it is the duty of the national office to initiate the campaigns, but it is the duty of the regions to conduct and co-ordinate the campaigns? -- I would like to go back to that exhibit so that when I respond, I know exactly what is written in that exhibit. May I be advised as to the section that counsel is basing his interpretation on or his question on? 10

COURT: To which part are you referring, Mr Jacobs?

MR JACOBS: I will have to check up and see again. Paragraph 4.4.1, I think it is on page 15. You can also look at page 17 paragraph (x).

COURT: Which portion of this paragraph 4.4.1?

MR JACOBS: The heading of it:

"The UDF head office serves as a linkage between the different regions. In addition its role can be broadly defined as initiating campaigns"

and then on page 17 paragraph (x). 20

COURT: It is paragraph 4.4.2(x). -- I see that. However, once said the regions take up the campaigns they have got to be - if they are UDF campaigns, they have to be co-ordinated nationally by the UDF. It states here that often regions will not be in a position, regions will not be in a position to entirely take responsibility for these campaigns.

MR JACOBS: So is the position not this, that the first point is that campaigns are initiated by the national office according to these two paragraphs now, that is the first part of it? -- That is what he says, that it is a two-way 30

process/...

process.

And the second point is, it is only when .. -- If I may be allowed to finish the comment, that it is a two-way process. If it is in the case of those which started at the NEC, then they go down to the regions, but still they have to come back to the NEC, and there are others which come as proposals from the regions themselves and they go up to the NEC and then to other regions. So that the NEC could initiate them only insofar as it synthesises the views of various regions and say finally give a feed-back to all the regions that in respect of this issue that arose at such and such a region, the general view of the regions is that this must be taken up as a campaign. In that sense then it becomes something initiated by the NEC, by the national office.

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ASSESSOR (MR KRUGEL): Mr Molefe, while we are back with EXHIBIT "C53", could we perhaps just discuss the paragraph on page 6 under 1.2.3, "Anti-Election Campaign", which is or was - which was a UDF campaign at the time? -- That is so.

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The last paragraph reads as follows:

"Successes were achieved by linking day-to-day struggles with political issues, thus issues like food prices, housing, education and the threat of conscription were important facets of this campaign."

So actually conscription is seen here - conscription apparently was then used according to this paragraph as a facet of the broader campaign, the anti-election campaign? -- Well, in the sense that the conducting - the argument against the new constitution, one of the reasons was that

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it/...

it was laying the basis for the conscription of the Coloured and Indian youth. In that sense, yes, it became part of this, because I said the issue of conscription was really at the heart of the constitutional proposals. The arguments which were presented as to why the Coloureds and Indians should be given a vote were essentially the fact that they have to go and fight on the borders. So that in that sense, in the argument the issue of conscription would be referred to from time to time, but conscription per se as a campaign, it was not taken up. 10

It is described in this document, I think under the heading - it is in another document where they are referred to as limited activities. -- Yes.

MR JACOBS: And do you agree that the anti-conscription was a national matter, Mr Molefe, and not only restricted to one or other province? -- It was a national matter but no clear approach had developed yet on that issue. The matter was still under discussion. It had not reached the stage where we at the national level could be able to handle that issue. 20

And the other part of this question now is that it was the regions that must advance campaigns, whether they emanate from the regions themselves or from the national office. That is in paragraph 4.4.2, the heading of that paragraph, on page 16. You asked me to refer you back to that. -- Which section are we referring to?

The heading of that "Other National Functions", the first paragraph, that paragraph underneath "National Functions". -- That is so.

So Mr Molefe, can we then get it clear: it is a function 30  
of/...

of the UDF National to initiate campaigns. That is the first point. Is it correct or not? -- I would not say it is its function. It does - there are circumstances where it initiates campaigns.

And I put it to you, the next point is, it is a function of the regions to advance the campaigns initiated by the executive? -- That is correct, regions would advance campaigns and the National would have to co-ordinate the campaigns conducted by various regions, in respect of the specific focus that the UDF has decided upon. 10

And the third possibility is, in case it is impossible for a region to conduct and advance a campaign, then it is the duty of the National again, then they will take it over. -- To what, conduct that campaign?

Yes? -- It does not work like that. The national office is run by two full-time employees, and then you have some members of the National Executive who will become part of that. If the Western Cape region of the UDF is unable to run a campaign, it is simply that it is finished, you cannot have 25 or 20 people going to conduct a campaign in the region of the Western Cape. The national office might try to motivate that region to take up that campaign, but if it is unable to do it, there is nothing the national office can do. 20

Can we also have clarity on who co-ordinated and conducted the campaign against Black Local Authorities? -- The national office did, though essentially the vast bulk of the work was done by the regions because they are more immediately in contact with the regional situation than the national office is. 3

Do/...

Do you know whether any media emanated from the UDF either nationally or regionally in regard to the conscription - let us put it in brackets then - issue? -- I cannot recall any national media produced on anti-conscription, on conscription, neither do I recall regional media produced in that regard. I do not know.

Do you know whether this anti-conscription, was it used in meetings, mass meetings, rallies organised by the UDF? -- Yes, it was linked to the issue of elections to the tri-cameral parliament, as one of the implications of the implementation of the tri-cameral system. 10

Mr Molefe, I would like to take you to another campaign. Was the International Youth Year a campaign accepted by the UDF National? -- I believe so, though it was really a campaign of the affiliates of the UDF essentially.

Was it a campaign of the affiliates or was it a campaign taken over by UDF National? -- I think it was essentially a campaign of the affiliates of the UDF. UDF National was not co-ordinating that.

Do you know who paid for this campaign? -- I was informed that the NEC supported financially the youth affiliates; to what extent I do not know, but I think to a limited extent some money was given to them. 20

Did the UDF National specially set about some money for the running of this campaign? -- I know of no special money set aside for that.

COURT: The affiliates had to pay a subscription to the region. Is that correct, an annual subscription? -- That is correct.

But how did UDF National get its money? Where did your/... 30

your salary come from? -- The UDF National relied largely on grants.

Grants? -- Yes, and then of course it would print T-shirts and sell them to raise money, and where regions had raised a lot of money, they would give part of it to the national office.

MR JACOBS: Will you have a look at EXHIBIT "C41.5", that is in Volume 3. -- I have got the exhibit.

On page 3 of that, Mr Molefe, under the heading "Regional Debts".

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COURT: 41.5 has only got two pages and it is a circular letter or a memorandum.

MR JACOBS: I just want to check the numbers. It is 41.3. There is a reference on page 3 of that ..

COURT: What is the status of this document?

MR JACOBS: This was found in the UDF offices in Johannesburg and this is the minutes of a joint treasurer's meeting held on 12 January 1985 in Durban, and it was signed by you, Mr Molefe, is that correct? -- I have a bit of a problem. Are we referring to the minutes or to the circular?

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COURT: The third document is the minutes of 12 February.

MR JACOBS: Of the joint treasurer's meeting. -- It has not got any signature.

But the people present were the national treasurer, treasury, Transvaal, Border as well as from the national offices. Do you know who attended this meeting from the national office? -- I was present there. I think the two national treasurers were also present, Mr Ramgobin and Cassim Saluji. So was the national publicity secretary. think the four of us were from the national office.

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Now/...

Now, on page 3 of that report under the heading "Regional Debts", paragraph 5, I just want to make something clear there, and the second paragraph under that item, item 5, it starts with Western Cape. Now, there is a reference that R16 000 had been allocated in March 1984 for the usual campaigns. Now, can you elaborate on that and tell the Court what money was paid over to the Western Cape and for what purpose? -- Well, it was really for UDF campaigns. At that time the campaign was the million signature campaign and the campaign against - it was after the campaigns against 10 the million signature and the campaign against the tri-cameral election. I think all they were saying is that the NEC - the national treasurer was supposed to have advanced that amount to the Western Cape and he had not done it by that time, by the time of this meeting.

And then will you have a look at EXHIBIT "C41.5" then?

COURT: Just a moment, while we are on this question of financing. Paragraph 5 says:

"The Transvaal region reported that they owe a total of R23 000 and requested the national treasury to 20 assist them in meeting this debt. The Western Cape got R16 000. The Transvaal also submitted a request for a loan of R12 000 to be used for fundraising purposes. Natal recommended that Transvaal should borrow from the proposed allocation for the time being."

Now, this would seem to be an allocation by the NEC to the different REC's. I thought they were autonomous. Now it seems to me that they were rather dependent on the national body for their existence? -- Well, to an extent they were dependent because whilst they were able to raise money, 31

there/...

there was a general agreement that the national office, the national treasurers carry the responsibility of raising money broadly for the UDF, and whilst there was money beyond what was required to run the national office, X amount thereof was given to the regions.

MR JACOBS: Have you got EXHIBIT "C41.5" in front of you?  
-- I have got it.

Now, Mr Molefe, this is a document found in the UDF offices Johannesburg and this was sent out by the national office as a memorandum and it was signed by you? -- That is correct. 10

Now, what is this memorandum? About what is it? -- It is about the International Youth Year. Must I read through it? Maybe counsel should ask questions that he would like to out of this.

Is this referring to a campaign of the International Youth Year campaign? -- It is referring to a campaign that was being discussed by affiliates, of the youth affiliates of the UDF and non-affiliates of the UDF. It relates specifically to the discussions that had taken place, I think 20 the previous weekend or so, the previous month.

Will you read from the second paragraph? --

"The national office discussed the report (verbal) of the said meeting with the co-ordinators of both the NYO and the IYY namely Ben Motsisi and Deacon Mati. After this discussion the national office was left with the impression that firstly there was no strong motivation as to why the campaign should not be conducted under the banner of the UDF. Secondly that there was no clarity as to how they propose to prepare for 30 the/...

the campaign between then and the formation of the NYO. Thirdly that meeting did not seem to recognise the urgency of the IYY and to that extent did not give a deadline for co-ordinating structures to be set up and the unrolling of the IYY program."

MR JACOBS: So was this campaign taken over under the auspices of the national office? -- No, it was not. There was a motivation - the motivation really was that the campaign be conducted under the banner of the UDF. That was the motivation, but it was not - in any event I do not know, because finally I got detained and this thing was to reach a climax in 1985, I think July or so, 1985. It may well be that later on it was co-ordinated by the national office, but I do not know. But up to the time of my arrest it was not co-ordinated by the national office.

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Will you read the second paragraph please? --

"It is the view of the national office that the decision taken is incorrect."

MR JACOBS: Which decision are you referring to here? -- The decision that the IYY would not be conducted under the banner of the UDF.

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"The UDF has already won a great amount of legitimacy both nationally and internationally. Many people and organisations on these plains will support anything that is associated with the front. To give the IYY campaign publicity and to win even greater support for it, we need to encourage our affiliates to conduct it under the banner of the UDF. This will also provide a measure of protection from the State harassment to activists for they will be projected as UDF activists

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in/...

in the event of detention and arrest, and the State does not want negative publicity at this stage. They may therefore avoid unnecessary arrests."

MR JACOBS: Yes, and the next paragraph? --

"But important is the fact that we have already started building the UDF as a vehicle to advance our struggle. The youth organisations in their campaigns, especially the IYY, must be seen to be part of this broad movement. The IYY provides the scenario. Another factor which every region must take into account is that it is the UDF which is ultimately responsible for everything done by our affiliates locally and abroad. There must be therefore a close co-operation and common discipline to our approach to issues. Now the UDF having gained experience during past campaigns, it stands a better chance of assisting and ensuring that the campaign becomes a success."

MR JACOBS: Mr Molefe, and is it not so that the campaign was eventually after this letter, it was decided and the campaign was run under the auspices of the UDF? -- I do not know of that decision. I think "C102" might give us an idea as to what the situation was like in 1985, by April 1985. If I may just look it up.

Will you have a look - I think I can help you there, "C102" page 10 paragraph 3.5, Volume 6. I am sorry if I mislead you, I have numbered my pages, that is for my convenience. No 10 is the secretarial report. -- It is actually page 3 of the secretarial report.

Paragraph 3.5. -- As I understand it, right up to this time it was still a matter that was handled by the affiliates

of/...

of the UDF.

Is it correct that it says here, on the last page:

"The South African Government is pouring thousands of rands into its youth campaign and it is essential that the way in which we conduct this campaign leaves no doubt as to who represents the people of our country. We must use the campaign to effectively project extra-parliamentary opposition to the viable alternative to the current regime."

-- That is what it says.

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Is it not referring to the UDF in the secretarial report that you have written here? -- It refers to those affiliates of the UDF and all it indicates is that the UDF was fully behind that campaign, it supported it.

So there was then a campaign on the International Youth Year, still another campaign that you said, except for the four mentioned by you? -- By the affiliates, it was supported by the UDF.

Mr Molefe, this secretarial report, if I understood it correctly, it was compiled by you? -- Jointly with my col-  
league Mr Lekota.

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And while we are here now, before I forget about it, the key note address on this meeting, did you receive it before the time? -- I did not.

When was this report completed? -- It was completed on the morning of Saturday.

Is it before the start .. -- I think it was - before the start of the conference - no, after the conference had started. The conference had opened on Friday night.

And you were not present? -- I was not.

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At/...

At the conference? -- Yes.

You see, there is something strange because in this secretarial report you refer to the contents of the key note address? -- Yes.

Where did you get it from? -- Well, I was compiling the report jointly with no 20. He gave one of the key note addresses. It refers to that.

What was his address to the meeting? What were the contents of his address to the meeting? -- I cannot give the full content, but it dealt broadly with what we understood by, from protest to challenge and mobilisation and organisation, and it dealt with what we called the camp of the enemy and the people's camp, defining the need to win more and more those people who are serving the structures that promote the policies of apartheid over to the side of the UDF and to influence the thinking within Government circles, persuading them to move away from the policies of apartheid, and to support the democratic alternatives as projected by the UDF. 10

Now, Mr Molefe, the International Youth Year campaign, do you know who actually were the people who conducted that campaign? 20

COURT: You mean where, in South Africa?

MR JACOBS: Who was in control, conducted it in the sense of organising it, controlling it, co-ordinating it, in South Africa? -- Well, we do not believe in this thing of controlling, but it was co-ordinated by a committee that was set up to co-ordinate it. My recollection is that the key co-ordinator of that committee was Daniel Motsisi, and there was another chap, I think his name is Vincent Williams. 30

Those/...

Those are the two people I can recall. I think Deacon Mati was also a member of that committee.

Now, the three that you can remember, were they members on the executive of the UDF? -- Deacon was a member of the Transvaal Executive, and later on Dan also became a member of the Transvaal Executive. But I must hasten to state clearly here that when they served on that committee, they were not seconded by the Transvaal Executive to serve there. They were elected by youth groups that had met to discuss the issue, and the officials of the UDF were not there 10 except these two fellows. In fact my recollection is that that committee was formed long before Dan Motsisi became a member of the Transvaal Executive of the UDF, at the time it was only Deacon who was a member of the Transvaal Executive.

Do you know whether this committee did conduct this campaign under the auspices of the UDF? -- There were debates on that thing. I do not know if it finally was conducted under the banner of the UDF. All I know is that from the documents that I had seen which were written some time in 20 1984, the impression was created that it would be conducted under the banner of the UDF, but at the beginning of 1985 the situation had changed.

Mr Molefe, can you remember how many members were on this co-ordinating committee? -- I cannot remember. I have not met with that committee myself.

And where was this committee situated? -- I think there was a request from their side at some stage that they would like the national office to allow them to use the phone from time to time and the facilities when they wanted 30

to/...

to deal with - do some work of co-ordinating, phoning regions and so on, or phoning overseas and so on. So that I do not know precisely where they were based, but they could come from time to time to use the national office. They were free to do that.

Now, EXHIBIT "J5", have you got it with you? -- I have got it.

This is a document that was found with Roland White in Port Elizabeth. I do not know if yours has got - on the opposite page there is a letter under which this document was sent. -- Yes, I have got that letter. Is it the letter on the left-hand side of which is UDF National Office, 16 November 1984? That is the one I have. 10

ASSESSOR (MR KRUGEL): Signed by Vincent Williams? -- That is correct.

MR JACOBS: Is that the letter - would you accept it that that is the letter written by the committee mentioned by you? -- I have to read quickly through it and see if there is any reference to the committee. On the face of it, yes.

Now, in the report itself, the International Youth Year report of Plenary Session held at Lenasia, 10 and 11 November 1984, it seems. -- I assume it is 1984. It is written 1985, but I do not think it is 1985. 20

Now, will you read from paragraph 2 at the top there please? --

"In the light of the paper presented and questions raised, the following discussions were held and conclusions reached. After we had established the fact that we were meeting as UDF affiliates and thus accountable to the UDF."

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So/...

So this committee accepted that they are accountable and they are under the auspices of UDF and they are accountable to UDF? -- Well, this is what that section says. But if you read it in conjunction with EXHIBIT "C41", document no 5, then it is clear that by the beginning of 1985 the situation had changed, so that maybe at this time that was the position. By 1985 the situation was not as reflected in this paragraph.

Will you accept then that according to this document it was decided to conduct a campaign on the International Youth Year under the auspices of the UDF? -- Yes, but also according to "C41" it was later decided not to conduct it under the banner of the UDF. 10

When was that decided, Mr Molefe? -- May I quickly refer to EXHIBIT "C41"? According to this exhibit it was decided on 12 and 13 January 1985.

What was decided then, not to conduct it, where was it decided? -- There was a meeting of youth organisations in Natal on that weekend. I was not present at that meeting, but the report I got from Deacon Mati and Dan Motsisi was that a decision was taken not to conduct it under the banner of UDF, and if you read - if one reads this memorandum carefully, it makes it clear that an attempt was made by the national office to get regions to persuade affiliates of the UDF to conduct the campaign under the banner of the UDF, for reasons that are set out in that memorandum. 20

I would like you to have a look also at EXHIBIT "C138" page 9, Volume 3. On the document, the typed number on the document it is page 5.

COURT: At the bottom of these pages there is numbering. 30

Are/...

Are you now referring to page 9, page 8 or to page 5?

MR JACOBS: I do not know which is the official number now. I have numbered it from the first page on mine.

COURT: I do not know whether you numbered it. I have got numbering at the bottom of the pages, right in the corner.

MR JACOBS: If we work on that one, then it is page 8. There is a heading "Program of Action". -- I see that.

Now, this document, on the first page, on the cover page there is United Democratic Front Closed AGM, 16, 17 March 1985, Reports and Resolutions. -- I see that. 10

Now, according to this program of action, that is the UDF program of action. Is that correct? -- Well, maybe I should go through it quickly and understand what it is all about. No, M'Lord, I do not understand it to be the UDF program of action. I understand it to be the suggestion or suggestions of the compilers of this report that a program of action has got to be developed, and that program of action should include these points as set out here, that it should deepen the gains which result from the increased politicisation and renewed circumstances which flow out of 20 the popularity of the UDF. It should also include the whole question of ensuring a role for each affiliate as well as a continued co-ordinating role for the UDF. Thirdly that it should include campaigns around the major issues, forced removals, cost of living, unemployment, the international Year of the Youth and the Freedom Charter. I understand it to be the suggestion of the writer of this report, that when a program of action is formulated, it should include those items.

And here it is suggested then that there be a campaign 30 about/...

about the International Youth Year. -- Yes, it is a suggestion.

Mr Molefe, if there is a campaign on the International Youth Year, do you know whether any representatives of the UDF or anybody was sent overseas in regard to this? -- I do not know, but I know that before my arrest, my detention in 1984, I had received a call from the office of the secretariat, international secretariat - the secretariat of the International Youth Year Committee based in Geneva, indicating that they are considering inviting a UDF youth representative, but as it were, by the time I got arrested, that had not materialised and besides, one was removed to an extent from the happenings around the IYY. 10

After your arrest .. -- And when we look at - this exhibit that we are dealing with is dated 16 and 17 March 1985, and the whole question of the IYY here is still a suggestion as part of the program. To me it indicates very clearly that even in the Western Cape at this stage it was not clear as to the role of the UDF in the IYY campaign.

Now, did the UDF discuss and decide in principle on whether they were going to send representatives to the International Youth Year conference? -- My recollection is that the matter was referred back to the regions and youth affiliates to discuss it. I cannot remember getting any feed-back on that. I was arrested whilst the matter was under discussion. 20

And do you know whether anybody did attend that International Youth Year? -- I do not know. As I said, the main event was to be, I think around July 1985, and by that time I was in detention. I was already charged here and awaiting 30

trial/...

trial in gaol.

And this International Youth Year campaign, was it to be run only in a region, in the Transvaal, say, for instance, or was it a national campaign? -- There was an interim co-ordinating committee, national interim co-ordinating committee so that it was that committee that was going to co-ordinate that campaign countrywide, as I understood it.

And Mr Molefe, was it of importance to the UDF to run such a campaign? -- Yes, it was.

And did it decide to run such a campaign? -- Well, the UDF, it attempted to persuade its affiliates to agree to that, but at the time of my arrest there was no agreement in that respect. 10

Yes, but could the UDF not have decided by themselves to run the campaign on a national basis? -- No, the UDF could not do that. It depended on the youth affiliates. It is a matter that concerns young people, and if affiliates, youth affiliates did not want the UDF to do it, there was nothing the UDF could do, and besides the UDF would not like to alienate its affiliates by going against their wishes on a matter that directly concerns them. 20

Mr Molefe, then the campaign against the Ciskei, do you agree now that there was a campaign on matters pertaining to the Ciskei? -- In the manner that I have dealt with it in my evidence in chief, protest against the brutalities, giving publicity to what was happening there, putting pressure on the Government to stop those brutalities, collecting moneys to buy tracksuits and blankets for those people. Relating to that specific period of that repression, for that period, and I think it was really just for the month 30

of/...

of September.

Was that a national campaign? -- In that sense, yes, it was, in the sense that although it was done jointly with the unions.

Who decided on running this campaign? -- I think the NEC in September, 10 and 11 September, I think it should be contained in EXHIBIT "D1" where we said that - if I may have EXHIBIT "D1". EXHIBIT "D1" is the minutes of the UDF NEC held on 10 and 11 September 1983 at Phoenix Settlement in Durban. At page 5 of the minutes, item 13 refers to Ciskei and the banning of Sao. I would just quickly like to, if Your Lordship permits, read that section, the whole section. It says: 10

"Following the repression in Ciskei and the banning of SAO, the NEC took these decisions: to call mass meetings in protest of the banning of SAO and to pledge solidarity with the people of Ciskei; to draw the unions into the campaign; if the unions already have plans of their own, the UDF should try to fit into their programs; the secretariat to call urgent meetings with the unions in all structured regions; to issue press statements on the banning of SAO; to expose the fraud of the Santustan policy; the secretariat to work out proposals for meetings with unions on an ongoing basis; Western Cape region find out what unions what unions were doing regarding illegal arrest of unionists from GWU (that is General Workers' Union) and the African Food and Canning Workers' Union; Durban region to approach the Durban office of SAO; Transvaal region to approach the Legal Resources Centre on the illegal hand-over/... 20 30

hand-over of unionists from General Workers' Union and African Food and Canning Workers' Union to Ciskei by the South Africa Police."

So that really what the NEC was concerned about was the publicity around this issue, calling meetings to protest, and in areas where the unions had already started, the UDF would simply try to fit into the activities of the unions. I think in the Transvaal unions had decided that they wanted to set up a committee to handle this campaign, and the UDF became part of that ad hoc committee, and meetings were held in other places, but the real purpose of those meetings was really to demonstrate protest and to give as much publicity to what was happening in the region as possible. So the whole issue was really limited to protest and publicity, in that respect. It was not an ongoing campaign against Ciskei in the sense of a campaign. I doubt if the matter would have been considered in this light if there had not been those atrocities taking place at the time.

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So it was not on an ongoing basis, but in this report it says here:

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".. that the secretariat work out proposals for meetings with unions on an ongoing basis."

-- That relates to a general relationship with the unions. It really relates to the drive by the UDF to draw unions into its ranks. It is not specifically related to the Ciskei thing, although this issue had presented fresh opportunities for that, that kind of a thing to be followed up.

Now, Mr Molefe, you said that it was to give publicity; publicity to what? -- Atrocities.

Only in the Ciskei? -- The killing of people there,

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the/...

the arrests of hundreds of people into the stadia, the assaults on people, all those kind of things, the banning of SAO itself, an affiliate of UDF, the arrest of trade unionists. That is all we had in mind. There is an exhibit here which we dealt with when we - I think it was in the evidence in chief when we were dealing with the issue of Ciskei. It is a letter signed by me. I cannot remember exactly what the exhibit number is now, but it sets out clearly what we intended to do around the issue of Ciskei.

Mr Molefe, is it not so that this was also linked up to the homeland policy of the Government? -- In a sense it was, in the sense that we believe that if the Government had not given independence to Ciskei, Lennox Sebe would not have considered himself above the law, would not have done the things that ordinarily law would prohibit anyone from doing. 10

And is it not so that it is part and parcel of the plan of the UDF to mobilise and organise the people against the homelands and the Government? -- This was not the issue at this stage. This was not the issue. This was related specifically to what I have said. 20

And I put it to you, Mr Molefe, that in actual fact what happened was that it was used, these activities in Ciskei, in order to get the people angry at the Government as the reason for the atrocities in Ciskei? -- It is true that the people were angry with the Government because those puppet leaders were now killing the people because they had the power of the police force and the army. They were killing people, but it is not true that this issue was addressed because we wanted to make people angry against 30

the/...

the Government. That is not the issue. Any sensible person would have regarded this as a matter that warranted attention. We could not leave things to take their own course when our people were dying, unarmed people were being killed there.

But what happened at the meetings was that the blame was put onto the Government in order to get the people to reject the Government and to blame the Government and to get angry at the Government? -- The Government was criticised. It had the power to stop what was happening there, but it did not do so. It did not exercise that power. 10

COURT: How did it have the power? -- Well, it has given independence to that homeland, and the homeland leader has listened to the Government, and on many occasions the Government has pointed out unequivocally that those who lead the homelands owe their positions to the Government. It had said this about Chief Buthelezi and others in the past when they criticised it. So that it really had the power.

We are now talking of an independent state. We are not talking of Zululand. -- Yes, that state is independent, but it depends on the South African Government for its money, it gets grants every year to show that it is still linked to the South African Government although it is independent. 20

But how could the Government have stopped the atrocities, our Government? -- The Government would have gone there and spoken to that government to stop what it was doing. It has got the power. It is feeding that government; it is financing it. It could have simply said, look, you stop that or you get no money from us. We cannot finance your army and police force to kill unarmed people. If these people/... 30

people have done anything wrong, arrest them and bring charges against them. It could have done that. It is capable of doing that. It has not done so.

MR JACOBS: Mr Molefe, do you know what the Government did, the South African Government did or did you not know? -- My perception of the public was that it was doing nothing. I know of no statement condemning what was happening there.

So you are condemning the South African Government without knowing what happened in private between the two governments? -- Well, what was happening was so bad that it could not be something that the people could whisper about. They had to speak out against it, and in fact when the UDF criticised the Government publicly, that was the opportunity for the Government to say, look, you are just criticising us for nothing, we are actually doing something about this, we are stopping it. 10

Mr Molefe, is it not so that the Government is blamed so overall by the UDF that it serves no purpose to answer you? Everything that happens in this country, you blame the Government for? -- Well, the Government has answered certain things in the past. It has answered allegations by the DPSC and other groupings regarding - in respect of certain things that it was accused of doing. I cannot see any reason why it could not answer the UDF on this specific issue. It has never lost the opportunity to respond to issues where it thought that it was misrepresented. 20

And I put it to you that this was used as a part of the plan to get the people, the masses to regard the Government as the enemy and as hated and so that they can take part in action, associate themselves with the freedom struggle/... 30

struggle against this oppressive government, as part of the plan of depicting the Government as the oppressive government? -- I do not accept the proposition.

Do you know whether there were any publications from UDF issued except for the pamphlet mentioned by you, any other publications by UDF National or regional on this? -- For regional or a region? I cannot understand the question.

Regional or national? -- I cannot remember any other publications.

Do you know whether the UDF News issued any articles on this? -- I am not sure about that. I cannot remember. It might well be, if the UDF News came out during that time or shortly after that time, it might well have carried a story on that, an article on that. 10

And Mr Molefe, I put it to you that it did not end with the meetings held at that stage, referred to by you, here in court, but it went on afterwards for a long time that the atrocities in the Transkei were used in the campaign against the homelands and in general against the Government? -- Well, if such a thing had happened, such hideous acts of atrocities had taken place, one would imagine that from time to time when people spoke about homelands, they would maybe prefer to talk about it, cite it as an example of what happens in those places. I do not dispute the fact that it could have been mentioned from time to time, but insofar as the UDF activities around this thing is concerned, it was for that month. It may well be that in some meetings when resolutions were taken, Ciskei would have been included in those resolutions, but that I do not regard as a campaign. 20 30

Is/...

COURT: Is this now the month of September 1984? -- It may well have happened even after that. I am not sure.

MR JACOBS: Mr Molefe, what do you say, was there a campaign on the economy of this country and a campaign against cost of living, GST, general sales tax? -- No, there was no campaign. There were discussions that those issues need to be addressed, that possible campaigns should be considered around those issues.

Was there a campaign against Black Christmas? -- Against Black Christmas? 10

COURT: Against White Christmas.

MR JACOBS: A Black Christmas campaign? -- Yes, that was, as I understand it, initiated by the Federation of South African Trade Unions. The UDF supported that. It is a limited thing around the Christmas period.

And was that not part of a campaign against the economy of the country? -- No, no, I did not understand it that way.

COURT: It was by the Federation of South African Women? -- Trade Unions, FOSATU. I think they worked jointly with 20 other unions. I really came into this thing much later because I had been in detention when it started.

MR JACOBS: Now, will you have a look at EXHIBIT "A35". Have you got it? -- I have got it.

What is this document? It was a document found in the UDF offices in Johannesburg. -- In Johannesburg? It purports to be a UDF pamphlet with the UDF logo and it says "Unite against Suffering" in big letters. Then it says "Issued by UDF, printed at Nusas, 131 Lower Main Road". I assume that this place is in Cape Town. I do not know such an address 30  
in/...

in Johannesburg.

If you will read the paragraph "UDF and its Organisations" which belong to it. Would you read that please? --

"The UDF and the organisations which belong to it are daily made aware of the increasing hardship of our people: eggs, bread, milk, mealie meal, train and bus fares, hospital fees and GST; all these things have gone up in price. Our people cannot pay these increases. Families and especially children are suffering."

MR JACOBS: Mr Molefe, would you agree that this is a pamphlet issued by the UDF against the GST and the economy of this country, the increases in prices? -- May I read the whole pamphlet and see whether it supports what counsel is saying? I may also point out that I do not know this pamphlet. I saw it for the first time here as an exhibit. In fact it is the very first time that I am reading it today. I think the section following the one that have just read, under the big lettering "The UDF Believes", it says: 10

"In a rich country like South Africa food, rent, transport and health services should be provided at prices all people can afford. It is the poor that suffer most from the burden of GST. The basic things people need to buy every day should not be taxed. The money collected from the people in tax should be spent for the benefit of all. It should not be spent to strengthen apartheid, to buy guns, bullets and tanks. It should not be used to bulldoze people out of their homes and dump them far from where they can find work. The new deal will not change apartheid. There is talk of change, but not the change that mean most to our people/... 20 30

people. It will only mean increased suffering. All South Africans should have a real say in the decisions which affect their lives in an individed, non-racial and democratic South Africa."

I do not understand it to be directed against the economy of the country. I see this as the normal complaints that people make, the kind of complaints that would be made by a consumer organisation formed by White people. In fact they have said so before, about price increases and so on. It is just the normal pamphlet. In addition, I have issued 10 statements specifically and in meetings that I addressed around that period, I made it very clear that the Black Christmas campaign was not a consumer boycott. It was not. I made that point very clear. It was widely reported.

Mr Molefe, can you tell the Court, how will it be possible for the Government to see to it that the goods will be sold at prices that all can afford? -- By avoiding duplication of unnecessary - avoiding unnecessary duplicat- ion. Today, how many parliaments do we have in South Africa? We have firstly this tri-cameral parliament, and then from 20 there you would have ..

COURT: Do you count that for one or for three? -- We have three parliaments, and then each one of them has got its own ministers, it has got its own ministers. Then we have the parliament for Bophuthatswana which must be supported by the South African Government by way of money. You have the parliament for Transkei which has got to be supported by the money in this country, all those ministers. You have the parliament for Kwazulu, it must be supported by the South African Government. You have Ciskei, you have 30

Qwa Qwa/...

Qwa Qwa, you have all those things with ministers each one of them, Minister of Education, you have several departments of education, so that if you did not have all those duplications, duplicated things, we would not have a situation where a lot of money has got to be spent to advance apartheid or to maintain apartheid. That money would be spent where it is needed. You would simply have one department of education and you have enough skilled people, qualified people to work in that department, and it is finished. You do not have to have a little army there for Ciskei, a little 10 army there for Bophuthatswana and so on, all those things. So that really I think the policies of apartheid are costing the Government quite a lot. All the moneys that are spent maintaining hundreds of people who are in gaols simply because they are said to have violated influx control laws which only apply to Africans, to have been found in a place which is reserved for Whites only, all those little things on which the Government is spending and all the paper that is involved there, court proceedings, all those things. If we did not have these policies of apartheid, we would have 20 a situation where that money is spent where it is supposed to be spent. Then we can have more housing, we can have better health care, we can get enough money for education, and we can have all people participating actively in building the economy of the country.

MR JACOBS: Mr Molefe, is that only when the Government is prepared to agree to a national convention and the government of the people .. (INTERVENTION)

COURT: Are we back again to square one?

MR JACOBS: No, Sir.

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We/...

COURT: We did that yesterday. Next question.

MR JACOBS: Is it also important according to this - I put it to you, it is important according to this that the people are made to understand that the Defence Force and the buying of guns and bullets and tanks are the reasons for the high GST and that is a propaganda set used by the UDF? -- Well, I do not think that is propaganda. If there was no apartheid, there would not be the need to keep in fear, building large armies and so on all the time.

COURT: I did not notice that there was apartheid in America and they have got a very, very large army. -- Unless we wanted to become a kind of country that would want to control the affairs of the whole world like America is trying and the Soviet Union probably, are trying to do. So that I am saying this on the understanding that we would be in the first instance concerned about the welfare of our country and defending ourselves only insofar as we are threatened by other countries. 10

MR JACOBS: I would like you to have a look at EXHIBIT "G1". 20

COURT: Where was this document found, Mr Jacobs?

MR JACOBS: UDF offices, Cape Town. Have you got it in front of you? -- I have it.

This is the minutes of the National Executive Meeting of UDF held at Rondebosch on 1 and 2 June 1984? -- That is correct.

Did you attend this meeting? -- Yes, I did.

Are you responsible for the minutes of this meeting? -- That is so.

Now, will you have a look at page 3 under item 25. 30

Have/...

Have you got it? -- I have got it.

Read it please? -- Item 25, it is headed "GST and Food Prices".

"It was noted that a campaign against GST and high prices had the capacity to take the front beyond the August 22 elections. It was accordingly decided that (1) the front must prepare a list of basic items (based on research) and couple a campaign around this and GST; (2) the national publicity secretary was asked to contact research units with a view to evolving a program of action; (3) regions must consult unions and ask them to participate in a joint campaign with the front; (4) it was recommended that July 1 1984 be a national day of focus on high food prices and GST."

MR JACOBS: Will you then agree, Mr Molefe, that it was decided on this National Executive meeting, on a campaign against general sales tax and food prices? -- That is so.

And was this carried out? -- It was not. In fact all the minutes are saying is that it was noted, all it is saying is really that consideration should be given to taking up a campaign on this. Then of course that would be determined by the list that was going to be prepared on basic food items which was going to be a product of research and what comes out of the consultations between the national publicity secretary with research units, and then thirdly what comes out of regions' consultations with the unions to participate jointly with the front. One thing that is clear is that the UDF intended to hold a meeting on 1 July. That was a decision that was definite, and it was intended that that meeting should focus on food prices. But once

more/...

more my recollection is that it did not happen.

Mr Molefe, paragraph 25.1, is that a direct instruction from the National Executive Council? -- That is correct.

So then the food prices must be coupled with the campaign around GST? -- That is so.

So there was a decision then for a campaign? -- It was noted that if the UDF was - after the elections, one of the things that the UDF could take up is a campaign on the GST and high food prices.

Mr Molefe, where do you see it written here that it must see if it can take up a campaign, because you have just now admitted that this was an instruction from the National Executive? -- When you have a look at what is said here, there is still some preliminary work that has got to be done here. The whole question of research, consultation, contacting of the research unit, consultations with the unions and so on. That would finally enable the UDF to move forward and see if it could take up - how practically to take up that kind of a campaign. It is not identified as an area where the UDF has got to address - to which the UDF had to address itself. 10 20

Mr Molefe, is it not so, I do not understand your evidence. Is it not so that any campaign, that there is preliminary work that must be done? -- That is correct.

And is it not clear from this that this is what is happening here? Preliminary work must be done in order to carry out this campaign? -- That is so. The allegation in the indictment is that a campaign was conducted, but in fact that was not conducted.

So are you answering now to the indictment or are you answering/... 30

answering on what is clearly said here? -- No, I am answering what is set out here, and as I understand it as a person who was in that meeting.

Mr Molefe, can you tell the Court, did you carry out the instructions given to you in paragraph 25.2? -- No, I cannot see any specific instruction that was given to me as the secretary, but these things were not done because of firstly the problems that this meeting took place at a time when there was serious focus on the coming elections for the tri-cameral parliament. It was not possible to address these issues. So these meetings did not take place as far as I can recall. 10

Did you contact any research units?

COURT: He is not the national publicity secretary. You can ask that question to no 20.

THE COURT ADJOURNS TO 1987-08-18