



FOR SA · FOR FAITH & FREEDOM

FOR SA Roadshow Pack

Prepare · Attend · Respond

Preparing pastors and leaders for the CRL Section 22
Committee hearings

This pack is provided by FOR SA to help you take part in the Section 22 Committee hearings. It gives you what to do, what to expect, and how to answer the case for State regulation of religion. What you say at the hearing is your own, in your own words. FOR SA provides the information; the voice is yours.

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PART 1

Sign Up. Show Up. Speak Up.

Your step-by-step guide to taking part in the Section 22 Committee hearings.

This information is provided by FOR SA to help you take part. What you say at the hearing is your own, in your own words.

The CRL's Section 22 Committee is holding hearings province by province. At each hearing, the Committee presents its own case for about two hours before anyone else may speak. After the Cape Town hearings, where attendees overwhelmingly opposed the proposals, the Committee claimed that those who spoke had been “bullied”, given “misinformation” by FOR SA and were reading a “script”. That is not true. Everyone who spoke did so of their own conviction.

The next Provincial meetings are pivotal. If the Committee can show even a divided response here, it will claim that the faith community supports what it proposes. We need many different voices, from many different churches, to attend and speak in their own words. That is why your church's participation matters.

1. Sign up

- **Register online.** FOR SA has placed a registration button, link and QR code on our homepage, forsa.org.za. Use it to register for the hearing you will attend.
- **Cover every day.** The current dates on the Section 22 Committee registration page cover several days, but there is not yet a clear definition of how many days will be open for people to present. Make sure your church, or a group of churches, has someone present every day, so that opposing voices are heard in every sitting and cannot be concentrated into a single session or day.
- **Bring others.** Encourage other churches and leaders to register too. Numbers matter, and so does the range of different churches represented.

Note: The venue and the schedule of sessions will be shown on the Section 22 Committee registration page, or emailed to you directly by their office. Check it when you register, and plan who attends on which day.

2. Show up, prepared

Come informed. The Committee will present for about two hours before you may respond. If you know the issues in advance, you can recognise and answer what is said, calmly and with confidence.

What to expect

- A presentation of about two hours by the Committee, before any responses are allowed.
- Short speaking slots when responses are invited, usually about five to ten minutes each.
- A respectful, church-meeting tone. Please match it: speak calmly and courteously, however strongly you disagree.
- You may be told of “rules” about photographs, recording or publishing. Take note of them, and raise any concern respectfully rather than in conflict. **There is no valid reason why public recordings cannot be made.**

Prepare in advance

- **Read Part 2, “What They Will Say, and What Is True.”** Take it into the room so you can weigh the Committee’s presentation as you hear it. Part 3 gives you the fuller briefing to study beforehand.
- **Prepare your own written submission** (see Speak up, below), with copies to hand in.

3. Speak up, and put it on record

You will usually have only five to ten minutes to present in person. Make it count. A short, calm, personal statement in your own words is far more powerful than reading anything word for word.

A simple order for your turn

- **Place your participation on record.** For example: “Thank you for the opportunity to speak. I place on record that I take part under protest. My attendance does not mean I support or endorse the Section 22 Committee, its mandate or its process, the lawfulness of which is disputed and before the courts. I ask that this be minuted.”
- **Introduce yourself.** Your name, your church or organisation, and the number of people it serves.
- **Make your main points in your own words.** Use the points in Part 2. You do not need to use all of them. Two or three, said with conviction, are enough.

- **Hand up your written submission as your “leave-behind”.** Download the FOR SA template submission, adapt it in your own words, put it on your church’s own letterhead, and bring copies to hand in on the day.

Two more ways to be counted

- **Make an online submission via Dear South Africa.** This creates an independent, public record that does not depend on how the hearing is reported. It takes only a few minutes. The link is on forsa.org.za.
- **Encourage your congregation.** Share the issue with your members. Show the FOR SA video and/or PowerPoint presentation, “Five Minutes to Make a Difference,” in a church service, then encourage congregants to click the link on the QR code at the end and make an immediate online submission via the Dear South Africa platform.

Before the day: please have your church’s leadership see and approve your written submission. The decision to attend, and what to say, are yours. FOR SA provides the information; the voice is your own.

PART 2

What They Will Say, and What Is True

The quick reference to carry into the hearing

TAKE THIS INTO THE ROOM. Their claims answered, and the questions to put on the record. **It is not a script** — use it to recognise the Committee’s claims, answer them, and put questions on record, all in your own words.

Start on the front foot

Open by agreeing that the abuse is real and wrong. Then hold one line: every abuse the CRL cites is already a crime, and the answer is better enforcement of the laws we have, not placing religion under State control. Do not only oppose — lead first with what the church has already done to regulate itself:

- **The Charter (2010).** The SA Charter of Religious Rights and Freedoms was developed under section 234 of the Constitution and adopted by bodies representing over 20 million people, with the CRL itself a signatory.
- **A Code of Conduct in use (2019).** Developed by and for faith communities and already submitted to the COGTA Portfolio Committee, the CRL and this Committee. This alone rebuts the claim that “there is no code of conduct.”
- **SACOFF.** The largest voluntary umbrella body currently represents 247 member organisations and 25,371 churches, with more than 5 million members — accountability and cohesion for the independent church movement.
- **The 2016 Joint Statement.** 101 churches, denominations and faith groups publicly repudiated abuse done in the name of religion. The sector has disowned the abusers, in writing.

Their claims, answered

The Committee is expected to give the same presentation it gave elsewhere. This sets its main claims against the record and against its own words to Parliament on 4 August 2026.

What they will say	What is true — and the question to ask
<i>“This is voluntary self-regulation, not State regulation.”</i>	Their own signed Terms of Reference (clause 6.1.1) provide for a legislative framework, a Religious Practice Council and a Council for Ethics and Accountability, the compulsory registration of institutions and practitioners, a public register, a “Seal of Good Standing,” and sanctions extending to “deregistration and public notification.” Their August 2026 briefing to Parliament said “the State provides the platform; the faith sector enforces compliance,” likened these councils to the medical and financial bodies (statutory regulators that strike members off), and undertook to send the framework to Parliament in May 2027 for “legislative support.” Ask: <i>How can a scheme that registers, certifies, sanctions and ends in legislation be called “voluntary self-regulation”?</i>
<i>“This Committee represents the Christian Church.”</i>	Their own briefing says the Committee “does not claim to represent every church or every Christian tradition” and that members “do not serve their respective organisations” — yet the CRL Chair still claims it speaks for 40 to 45 million Christians. Major bodies have opposed it or raised serious concerns: the Catholic Bishops (SACBC), the SACC, the AFM, the Full Gospel Church, the IFCC, the Assemblies of God and SACOFF. On 4 August 2026 Parliament’s COGTA Committee told the CRL that “the issue of inclusivity has to be addressed.” Ask: <i>Why are the submissions of major Christian structures, representing over 15 million people of faith, not recognised by the Committee?</i>

What they will say	What is true — and the question to ask
<i>“This is an independent, Church-led committee.”</i>	A Section 22 committee is established by the CRL under the CRL Act. The CRL appoints, pays and may remove its members and chairperson, sets its functions, controls its procedure and receives its reports. It cannot be both a creation of the CRL and independent of it. If it truly were independent, it would be acting outside the Act. Ask: <i>Please clarify the exact authority you rely on to validate this process.</i>
<i>“We have a mandate from Parliament’s 2018 report.”</i>	The Speaker of Parliament confirmed in July 2025 that the 2018 report lapsed at the end of the Fifth Parliament and was never revived, and so has no binding authority. Ask: <i>Since this Committee has no mandate from the 2018 COGTA report, on what mandate do you rely?</i>
<i>“We are here to listen; every comment will be recorded, considered and incorporated.”</i>	Their own diagram gives the goal of engaging churches as “sector buy-in and endorsement” of a framework already drafted in December 2025, and treats its necessity as settled — a question of “How,” not “Whether.” After Cape Town, a Committee member publicly dismissed those who opposed as having been “bullied” into a “script.” You cannot promise to weigh every comment and then discount those who disagree. Ask: <i>How is that compatible with your claim that this is an open-minded consultation?</i>
<i>“This only protects the vulnerable; the law has a gap.”</i>	Fraud, sexual offences, financial crimes, child protection, data protection (POPIA), tax and labour law already bind churches and are already enforced by the SAPS, the NPA, the courts and other authorities. The CRL itself can already investigate and refer under section 5 of its own Act. A voluntary Charter and Code of Conduct already exist. No new State-linked council is needed to enforce laws that already apply. Ask: <i>What gap in existing law have you identified that needs to be closed?</i>

What they will say	What is true — and the question to ask
<i>“This is not a predetermined outcome.”</i>	Their own roadmap slide states the Committee “has developed” the framework, the December 2025 draft is finished, and the roadmap ends at Parliament in May 2027. The CRL Chair said publicly on 2 April 2026 that she wants an Act of Parliament to set up a council that can decide where your right to religious freedom “begins and ends.” Ask: <i>How is that compatible with your claim that the outcome is not predetermined?</i>

What this would actually mean for your church

If the Committee says this is “only oversight,” point to what the draft framework and the CRL’s own statements would allow: a Council for Ethics and Accountability that could

- suspend or limit a church’s activities on an allegation alone, through a “Restricted Activity Notice”;
- order a minister into mandatory “training” or supervision;
- withdraw a marriage licence, or cancel the insurance of a practitioner or organisation;
- impose fines and other sanctions, including requiring “approved spiritual practices” as a form of restitution;
- report annually to Parliament on the religious life of the country.

Suspending a church on an allegation, and ordering “approved spiritual practices” as punishment, is not protecting congregants. It is the State running the church.

The proof: the gap is enforcement, not the law

When they say the law has a gap, answer with the record.

- **When existing law is applied, it works.** The “Prophet of Doom” (Rabalago) sprayed congregants with insecticide, was investigated, prosecuted and convicted under ordinary criminal law. The existing law was entirely adequate.

- **When it is applied badly, it fails.** Omotoso faced 32 charges including rape and trafficking and was acquitted on 2 April 2025, not because the law was missing but because the State prosecuted the case badly. A council and a Seal of Good Standing would not have secured that conviction; a competent prosecution would. The NPA was granted leave to appeal in July 2026, so the matter is again before the courts.

Every other harm on their list is already an offence: forcing people to drink petrol or poison, telling someone to stop life-saving medication, keeping children out of school, sexual abuse (where consent obtained by spiritual coercion is no defence), fraud and money laundering. The question is enforcement, not new law.

In their own words

Reading the Committee's and the Commission's own words aloud is often the strongest point you can make. Attribute each one. (More quotes you can read out are in Part 3, the full briefing.)

"They are all formed by an Act of Parliament ... It's their peers who will say your freedom of religion starts here and ends there."

— CRL Chairperson, Newzroom Afrika, 2 April 2026

"In whatever 'self-regulatory' terms this is couched, these regulatory bodies will be state-appointed, state-funded and state-controlled. As a result, the proposed legislation effectively amounts to state regulation of religion."

— Bishop Zipho Siwa, then Presiding Bishop of the Methodist Church and President of the SACC

The targeting is on the official record

To show this is about control, not crime, cite the State's own document. The National Security Strategy (2024–2028), released on 15 July 2025, lists the "mushrooming of charismatic churches" among the national security threats to be prioritised, alongside terrorism, organised crime and cybersecurity, and its glossary defines charismatic churches by their theology alone. In other words, the State has classified a theologically defined branch of Christianity as a national security concern. That is a direct equality and religious-freedom problem (sections 9 and 15). Keep it a fairness argument, not a conspiracy claim.

Points to raise and questions to ask

Ask one focused question at a time, name the section or clause if you can, and press for a direct answer. The Committee often does not answer — but putting the question on the record, unanswered, is itself the point.

It is not voluntary

- Will the Committee undertake that, if the Christian community rejects these proposals, its recommendations will contain no legislation, no council, no registration, no register and no Seal of Good Standing?

It is unnecessary

- Which of the harms you cite is not already unlawful under existing South African law: criminal, child-protection, financial-intelligence, tax and consumer law?
- What can a new council lawfully do that the SAPS, the NPA, the courts and the CRL's own section 5 powers cannot already do?

It is unconstitutional in its likely effect

- On what constitutional basis is a single faith singled out for a legislative framework, consistent with the right to equality (section 9) and the equal religious freedom of all (section 15)?
- How does a State-linked council enforcing a code or judging doctrine avoid limiting religious freedom (section 15), the right of religious communities to manage their own affairs (section 31), and freedom of association, including the right not to be compelled to affiliate (section 18)?
- If it does limit them by proposing a new law to regulate religion, how is this justified under section 36 when there are alternatives that require no further legislation?

It is unrepresentative

- Which churches and umbrella bodies expressly mandated this Committee to speak for them on legislation, registration, a council and the Seal? Will you produce the membership list and the written mandates?
- Will organisations that reject the mandate, Terms of Reference and draft framework be admitted to full participation as Committee members without first having to endorse them?

It is predetermined

- What outcome of this consultation would cause the Committee to abandon the framework, the council, the register or the Seal, rather than proceed to Parliament in May 2027? For each substantial objection, will you publish what was changed and what was rejected, and why?

It is beyond the Committee's authority

- Under which provision of the CRL Act may the Commission develop a legislative framework and a system to register, certify and de-register religious practitioners? If that power lies only with Parliament, why design the regime before any lawful authority to create it exists?

It is unaffordable

- What is the costed budget to establish and run the council and the registration system, and from which approved budget line would it be funded? If registration carries a fee, what happens to a church that cannot pay?

What we do support

FOR SA supports real accountability without State control. Offer this, so you are seen to bring solutions and not only objections:

- Enforce existing law: resource the police and prosecutors to do it well — the real lesson of Omotoso — using the CRL's existing powers to investigate and refer.
- A faith-led voluntary Code of Conduct built on the existing Charter, rather than a compulsory, State-imposed code.
- A CRL Ombudsman office to investigate genuine abuses and refer them to the police, SARS or the NPA.
- Stronger networks and fraternals, such as SACOFF, that provide relational accountability and end the isolation behind much abuse.
- Child protection through existing law: police clearances, sex-offender and child-protection register checks, and clear mandatory-reporting policies, applied properly.
- At most, a light-touch voluntary register for communication and research only, clearly separated from any power to approve, vet or license.

Say it accurately, so you cannot be tripped up

Always concede first that the abuse is real and wrong. Never sound as though you are defending charlatans; the answer is to report wrongdoing to the police and uphold the rule of law.

The Omotoso acquittal is a matter of record, but the NPA appeal is pending, so describe it as under appeal and do not predict the outcome.

Keep fact and allegation apart. The court challenges to the Committee's formation and the Chair's appointment are before the courts; raise them as questions, not as settled fact.

Any cost figures are FOR SA's own conservative estimates, not official numbers.

If unsure of a detail, fall back on the core: it is already illegal, the real failure is enforcement, and it is unconstitutional to license a fundamental right.

PART 3

The Case for State Regulation, Answered

The full briefing for pastors and leaders

READ THIS TO PREPARE. Every argument for regulating the faith sector, the law behind each answer, and the quotes and cases you can use.

Your one-line position. *“We are not defending abuse. Every abuse the CRL points to is already a crime under South African law. Where that law is properly enforced, it works. Where it is not, no amount of new regulation will fix it. The answer is better enforcement of the law we have, not placing religion under State control.”*

How to use this briefing

Stay calm and courteous, and concede the real point first: abuse is real and wrong. Then pivot to the five answers — the proposed regulation is unnecessary, unconstitutional, unfair, unworkable and unaffordable. Lead with what the church has in fact done. Quote the source or the case where you can. Sections 3 and 4 give you ready-made quotes and the specific powers being proposed; the appendix collects the case law.

1. “What has the church done to regulate itself?”

Say this: *“The premise is wrong, and Parliament has already said so. The faith sector has developed its own instruments of accountability, and in 2018 Parliament itself found that denominations have been self-regulating and that this has been working well for them. What the sector will not accept is a council created by an Act of Parliament with power to license religious leaders and strike them off. That is not self-regulation, that is State regulation.”*

The facts to back it up

- **The SA Charter of Religious Rights and Freedoms.** Developed under section 234 of the Constitution and adopted in 2010 by bodies representing over 20 million people. The CRL itself is a signatory. This is the sector setting out its own standards, by agreement, on a constitutional footing.

- **A code of conduct that is ready to use.** The Evangelical Alliance (TEASA) commissioned the SACRRF to produce a Code of Conduct, developed by and for faith communities. It exists and is available now, has been submitted to the COGTA Portfolio Committee, the CRL and the Section 22 Committee, and is endorsed in multiple submissions by major religious organisations. This rebuts the CRL Chairperson’s claim that “there is no code of conduct.”
- **Voluntary umbrella structures already exist.** The largest, the SA Community of Faith-based Fraternals and Federations (SACOFF), formed in 2021, currently represents 247 member organisations and 25,371 churches, with more than 5 million members, providing accountability and cohesion to the independent church movement.
- **The 2016 Joint Statement.** 101 churches, denominations and faith groups publicly repudiated unlawful acts done in the name of religion (the “Prophet of Doom” and similar) and called on victims to withdraw their support. The sector has disowned the abusers, in writing.
- **Built-in governance and existing law.** Churches already have internal discipline, ordination standards and denominational oversight, and are already bound by tax, labour, financial, consumer and criminal law. Registration is not required to worship, but is needed for legal status, a bank account and tax exemption, all of which bring their own reporting duties.

If they push back (“but clearly it hasn’t worked”): *“Self-regulation means the sector sets and enforces its own voluntary standards, and it does. No system, State or voluntary, prevents every wrongdoer. When someone breaks the law you prosecute them under the law, which already exists. You do not license an entire constitutional freedom because a few people abuse it.”*

Parliament has already been here (2018). After six days of hearings, Parliament’s COGTA Portfolio Committee did NOT support the CRL’s call for legislation, found that the CRL is not the body that should regulate the sector, noted that the vast majority of submissions considered the proposals unconstitutional, and found that “denominations have been self-regulating, and this has been working well for them.” It called for religious freedom to be protected “without attempting to regulate it from the side of the State,” and found “there were enough existing laws ... However, there were loopholes in the legislation, including lack of enforcement.”

2. The common arguments for regulation, and how to answer them

Argument 1: “Criminals are hiding behind religious freedom. We need regulation to stop the abuse.”

Your answer: *“I agree it is wrong. But there is no such thing in law as a ‘religious’ or ‘spiritual’ crime. A crime is a crime, whether you are a pastor, a postman or a politician, and religious freedom has never been a defence to a criminal charge. Every abuse the CRL lists is already illegal. The question is not whether we have laws — we do. It is whether they are enforced.”*

The two cases that prove the point:

- **When the law is applied, it works — the “Prophet of Doom.”** Lethebo Rabalago sprayed congregants with the insecticide Doom. He was investigated, prosecuted and, after due process, convicted — the ordinary criminal law and other existing statutes applied exactly as they should be. The existing law was entirely adequate to hold him to account.
- **When the law is applied badly, it fails — the Omotoso case.** Timothy Omotoso and two co-accused faced 32 charges including rape, sexual assault, human trafficking and racketeering. There was no shortage of law. Yet on 2 April 2025 the Gqeberha High Court acquitted all three, because the State failed to prove its case beyond a reasonable doubt, the court itself pointing to the poor quality of the prosecution’s cross-examination. Parliament’s Justice Committee said the case “failed the complainants and victims” and called it “an assault on the fight against gender-based violence.” The Supreme Court of Appeal granted the NPA leave to appeal in July 2026, so the matter is again before the courts.

The lesson to drive home: *“Omotoso was not acquitted because the law was missing. He was acquitted because the State prosecuted the case badly. A council and a Seal of Good Standing would not have secured that conviction — a competent prosecution would have. If the State cannot enforce the powerful laws it already has, how will passing more laws help? And the CRL does not even need more power: section 5 of the CRL Act already lets it investigate and refer matters to the police and any organ of State.”*

The rest of the “abuse” list is already covered too:

- Making people drink Rattex or engine-cleaning fluid: administering poison.
- Telling someone to stop life-saving medication (for example ARVs) who then dies: potentially culpable homicide, because a leader owes a duty of care.
- Keeping children out of school (the Seven Angels cult): an offence under the South African Schools Act 84 of 1996.

- Sexual abuse: rape or sexual assault under the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007. “Consent” obtained through spiritual coercion is not valid consent.
- Fraud, intimidation, money laundering, tax evasion, immigration breaches: all already criminal.

If they push back (“but the victims consented”): *“In law, consent is no defence to these crimes. As the courts have held, a dangerous practice designed to exorcise an evil spirit cannot be made lawful by the victim’s consent (R v Sikunyana), and consent given under a leader’s spiritual pressure is not free consent at all.”*

Argument 2: “The church is full of paedophiles and sex offenders, and does nothing to keep children safe.”

Your answer: *“That is a serious charge, and the law already deals with it, directly. Anyone who works with children — staff and volunteers alike — must by law be screened, and convicted sex offenders and people found unsuitable to work with children are legally barred from doing so.”*

The specific law to name

- **The National Register for Sex Offenders (NRSO)**, under Chapter 6 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007. An employer must check the register before placing a person in work involving children, and a listed offender may not be so employed. The Act also criminalises grooming and the exposure of children to pornography.
- **The National Child Protection Register (NCPR)**, under the Children’s Act 38 of 2005, which records persons found unsuitable to work with children, who may then not work with children.
- **Police clearance and mandatory reporting.** Police clearance certificates are available through SAPS, and the Children’s Act obliges those in positions of trust, including religious leaders, to report a reasonable suspicion of child abuse. Failing to report is itself a criminal offence.

The turn: *“So the honest question is not whether we need a new law — we do not — but whether churches are applying the law that already binds them. FOR SA’s answer is to help them do exactly that: police clearances, register checks and clear reporting policies. That protects children now, without placing the whole sector under State licensing.”*

Argument 3: “Doctors and lawyers are regulated, so why not pastors?”

Your answer: *“Because the two are not comparable. Medicine and law have an objective, uniform body of learning against which competence can be judged. Faith does not. Our Constitutional Court has held that religious beliefs are protected even where they seem, in its own words, bizarre, illogical or irrational (Prince v President, Cape Law Society). The State cannot lawfully set objective criteria for what people may believe or decide any form of religious orthodoxy, for any faith.”*

The sharper distinction: *“Being a doctor or a lawyer is a chosen profession. Freedom of religion is a fundamental right that belongs equally to everyone under section 15, alongside the right of religious communities to run their own affairs under section 31. You do not need a State licence to exercise a constitutional right. And religious organisations are already bound by the general law: tax, labour, property, financial and consumer law all apply to them today.”*

The bottom line: *“A council created by statute with power to decide who may practise religion, and to strike them off, is the State deciding who may exercise a constitutional freedom. Whoever sits on it, that is State regulation of religion, not self-regulation.”*

Argument 4: “Pastors should have to be properly qualified and trained, as some other countries require.”

Your answer: *“This is precisely the model in Rwanda and Angola, where, as reported, a leader must hold a recognised theological qualification before running a church, and thousands of churches have been closed as a result. It sounds reasonable, but it strikes at the heart of religious freedom.”*

Why a qualification requirement erodes religious freedom

- **It puts the State in charge of the curriculum of faith.** Someone has to decide which qualifications, from which institutions, count. That is the State prescribing an official orthodoxy of what may be taught, and by whom.
- **It removes each tradition’s freedom to teach its own doctrine.** Churches differ, legitimately, on doctrine, and each has the right to teach its own interpretation and to recognise leaders raised up within its own tradition. A required qualification forces every tradition through one approved theological filter.
- **It confuses calling with credentials.** A calling, not an academic degree, is the primary qualification for ministry. The twelve Apostles were described as “uneducated and untrained men” (Acts 4:13). Requiring a degree to preach would have excluded most of them.

- **It is unequal in practice.** It privileges established, well-resourced institutions over newer, poorer, rural and indigenous churches, particularly African-initiated and Pentecostal or charismatic churches, which offends the right to equality (s 9).

The line to land: *“A State that decides who is qualified to preach has decided what may be preached. That is not protecting congregations, it is controlling the pulpit.”*

Argument 5: “People are manipulated into giving money. We must protect the vulnerable.”

Your answer: *“Financial exploitation is real, and it is also already unlawful. Selling ‘blessed’ products with false promises, or charging for a guaranteed miracle, breaches the Consumer Protection Act 68 of 2008, which prohibits misleading and fraudulent advertising and unconscionable conduct. Deliberately deceiving people for gain is the common-law crime of fraud.”*

On fraud, be precise: *“Fraud does not require financial loss. The Appellate Division held in R v Heyne that the prejudice must involve some risk of harm, which need not be financial, and need not even fall on the person addressed. That is wide enough to cover a pastor who lies about a miracle to gain a following, and narrow enough not to criminalise honest belief.”*

Turn it around: *“If the real concern is protecting people from their own financial choices, why single out religion? The State runs the national lottery and licenses casinos. Where does faith end and financial gullibility begin, and do we really want the State deciding the limits of legitimate giving to a church?”*

Argument 6: “A council of theological experts will stamp out charlatans and bad theology.”

Your answer: *“It is not, and it must never be, the role of the State to enforce correct doctrine. A State-appointed peer-review mechanism that decides who may register as a religious practitioner equals State control of religion. When States tried to enforce religious orthodoxy in Europe in the 16th and 17th centuries, the results were catastrophic.”*

Ask the hard questions: *“Who appoints these experts? Which of the traditions do they represent? What happens when they disagree — on prophecy, healing, ordination, marriage or discipline? And by what constitutional authority may a statutory council set a binding national standard of Christian belief?”*

The legal anchor: *“Our courts already apply a hands-off approach, the doctrine of entanglement. In De Lange v Presiding Bishop of the Methodist Church, the Constitutional Court confirmed that doctrinal disputes should as far as possible be resolved within a religious community’s own structures, not imposed by the State. Courts, and the State, step in only when actual laws are broken.”*

Argument 7: “But this is only self-regulation, it is church-led, and almost everyone supports it.”

On “self-regulation”: *“Read the Committee’s own signed Terms of Reference. Clause 6.1.1 directs it to develop a legislative framework, a Religious Practice Council and a Council for Ethics and Accountability, the registration of religious institutions and practitioners, and a Seal of Good Standing. The CRL Chairperson said on SABC News on 2 April 2026 that ‘there must be an Act and a council formed out of that Act’. A framework created by legislation, with a statutory council and compulsory registration, is regulation by the State, whatever it is called.”*

On “church-led and independent”: *“Section 22 of the CRL Act says these committees exist to assist the Commission. The CRL establishes the committee, funds it, sets its Terms of Reference, appoints its chairperson, may remove members and may dissolve it. And the claim that the CRL is duty-bound to implement the lapsed 2018 report is wrong in law: under section 181 of the Constitution the CRL is independent and subject only to the Constitution and the law, not to a Portfolio Committee report, which the Speaker confirmed in 2025 had lapsed and was never revived.”*

On “everyone supports it”: *“That is not correct. The Committee claimed to represent 45 million Christians, which is a wild exaggeration. The Catholic Bishops called compulsory registration ‘unacceptable’. The SA Council of Churches raised eight concerns and a ‘deep-seated unease’. The Full Gospel Church, the AFM, the Assemblies of God, the IFCC and SACOFF have all opposed it, and at least one appointee (Great Commission Ministries) resigned. Attending a hearing is not endorsement. Ask them to produce the written resolutions of the bodies that formally support the framework.”*

3. In their own words (quotes you can use)

Faith leaders, on the record

“In whatever ‘self-regulatory’ terms this is couched, these regulatory bodies will be state-appointed, state-funded and state-controlled. As a result, the proposed legislation effectively amounts to state regulation of religion.”

— Bishop Zipho Siwa, then Presiding Bishop of the Methodist Church and President of the SACC

“The recommendation that new laws be introduced to enforce registration of pastors and ministers is overkill and a response that one would expect more from a totalitarian state than a constitutional democracy.”

— Archbishop Stephen Brislin, then President of the Southern African Catholic Bishops’ Conference

“[We] will not capitulate to a scheme of regulation that contravenes our constitutionally protected freedom to govern our own affairs in obedience to Christ.”

— The Full Gospel Church of God in Southern Africa

The CRL Chairperson, in her own words (the “mask slips”)

“You will be registered, and you will operate under a tight monitoring system ... and then if you operate illegally without the right license to operate, there are criminal charges following ...”

— CRL Chairperson, TV interview, July 2017

“Parliament must pass the relevant regulation ... you want to open up a church, you want to be a religious leader, you apply first ... The peer review committee will sit down and assess each person and grant them a license to run a church.”

— CRL Chairperson, Newzroom Afrika, February 2025

And on 2 April 2026, in two broadcast interviews on the same day, she set out the destination plainly — an Act of Parliament, a council formed and empowered by it, and that council deciding the limits of religious freedom:

“We then recommended ... that there must be a council for the religious sector, which will then mean there must be an Act and a council formed out of that Act. You have a council for lawyers, for doctors, for everyone.”

— CRL Chairperson, SABC News, 2 April 2026

“They need to be empowered, like the Legal Practice Council ... They are all formed by an Act of Parliament ... It’s their peers who will say your freedom of religion starts here and ends there.”

— CRL Chairperson, Newzroom Afrika, 2 April 2026

“Where we draw the line is when freedom of religion is exploited to abuse people ... That’s when freedom of religion stops.”

— CRL Chairperson, SABC News, 2 April 2026

The takeaway: *However she labels it “peer review,” she is describing a council created by an Act of Parliament that would decide where your freedom of religion “starts and ends.” Whoever sits on it, that is the State setting the limits of a constitutional right.*

4. What the proposed law would actually allow

If pressed on “it’s just oversight,” this is what the draft framework and the CRL’s own statements contemplate. A Council for Ethics and Accountability that would monitor, investigate and sanction faith communities, with power to:

- issue “Restricted Activity Notices” to limit or suspend religious activities or institutions based solely on an allegation;
- order mandatory training or supervision for ministers it deems to have transgressed;
- withdraw marriage licences or cancel the insurance of religious practitioners and organisations;
- impose fines and other sanctions, including requiring “approved spiritual practices” as a form of restitution;
- report annually to Parliament, establishing direct State oversight of religious life in South Africa.

The line: *“Suspending a church on an allegation alone, and ordering ‘approved spiritual practices’ as punishment, is not protecting congregants. It is the State running the church.”*

5. The five-point frame (your memory hook)

Unnecessary

Every abuse cited is already a crime, and the CRL already has powers to investigate and refer (s 5). The Omotoso case shows the gap is enforcement, not law.

Unconstitutional

It limits freedom of religion (s 15), freedom of association including the right NOT to associate (s 18), and the right of religious communities to govern their own affairs (s 31). Any limit must pass section 36, and it fails: the more substantial the inroad, the more persuasive the justification must be (S v Bhulwana), and a less restrictive means — enforcing existing law — plainly exists.

Unfair

The Christian sector has been singled out since 2017; a “staggered approach” to other faiths later does not cure unequal treatment (s 9). A separate statutory council per faith cannot produce one law applying to everyone equally.

Unworkable

Who counts as a “religious practitioner,” down to worship leaders, youth workers and home-group leaders? Who assesses thousands of denominations? What happens to a home-church that disagrees? Who monitors compliance, and what is the penalty — fines or jail?

Unaffordable

FOR SA’s conservative estimate put the current Christian-sector process alone at about R5.11 million, before the permanent cost of a council, a register and a disciplinary system, multiplied across every faith. Who pays, and will churches be charged a fee to exercise a constitutional right?

6. Don’t only be against it: the constructive alternative

FOR SA supports accountability without State control. Have this ready so you are seen to offer solutions, not just objections:

- Enforce the laws we already have, and resource the police and prosecutors to do it well — the real lesson of Omotoso. Use the CRL’s existing powers to monitor, investigate, refer and recommend.
- A faith-led voluntary Code of Conduct built on the existing Charter, rather than a compulsory, State-imposed code.

- A CRL Ombudsman office to investigate genuine abuses and refer them to the police, SARS or the NPA, so case law develops without new regulation.
- Strengthen networks and fraternals such as SACOFF that already provide relational accountability, ending the isolation behind much abuse.
- Protect children through existing law: police clearances, NRSO and NCPR checks, and clear mandatory-reporting policies, applied properly.
- A light-touch, voluntary register for communication and research only, clearly separated from any power to approve, vet or license.

7. Accuracy watch-outs (so you can't be tripped up)

- **Concede abuse is real.** Always open by agreeing the abuse is wrong. Never sound as though you are defending charlatans. The church's own answer is to report wrongdoing to the police, challenge false doctrine internally, and support the rule of law, not to invite the State to run its affairs.
- **Fact vs allegation, and sub judice.** The former chair's resignation claims, and the pending court challenges to the Committee's formation and the CRL Chair's appointment, are allegations before the courts. The Omotoso acquittal is a matter of record, but the NPA's appeal is pending, so describe it as under appeal and avoid predicting the outcome.
- **Attribute the security-strategy point precisely.** The "charismatic churches" classification is from the National Security Strategy (2024–2028), released 15 July 2025. Cite it as that document, and keep it a fairness and equality argument, not a conspiracy claim.
- **Don't overstate figures.** The cost figure is FOR SA's own conservative estimate. International examples (Rwanda and Angola) should be given as reported, to illustrate where State regulation can lead, not as exact statistics.
- **Stay on the strongest ground.** If unsure of a detail, fall back on the unbeatable core: it is already illegal, the failure is enforcement, and it is unconstitutional to license a fundamental right.

The targeting is now on the official record. The National Security Strategy (2024–2028), released on 15 July 2025, lists the “mushrooming of charismatic churches” among the national security threats to be prioritised, alongside terrorism, organised crime, violent extremism and cybersecurity. It cites the CRL’s 2017 findings, and its own glossary defines “Charismatic Churches” purely by their theology, as “a form of Christianity that emphasizes the work of the Holy Spirit, spiritual gifts, and modern-day miracles as an everyday part of a believer’s life.” In other words, the State has classified an entire, theologically-defined branch of Christianity as a national security concern. That is the clearest possible sign that this is about control, not crime, and it is a direct equality and religious-freedom problem (ss 9 and 15). FOR SA has publicly objected to it.

8. Key facts at a glance

- **Terms of Reference, clause 6.1.1 (signed by the CRL Chairperson, 23 June 2025):** legislative framework, Religious Practice Council and Council for Ethics and Accountability, registration of institutions and practitioners, and a Seal of Good Standing.
- **CRL Chairperson, SABC News, 2 April 2026:** “There must be an Act and a council formed out of that Act.”
- **Parliament (2018):** did not support legislation; found the CRL is not the body to regulate the sector; found denominations self-regulate and it works. The Speaker confirmed in 2025 the report lapsed and was never revived.
- **Constitution:** s 15 (religion), s 18 (association, including the right not to associate), s 31 (religious communities), s 9 (equality), s 36 (limitations), s 181 (the CRL is independent, subject only to the Constitution and the law).
- **Faith-sector self-regulation:** the Charter (2010, over 20 million, CRL a signatory); a ready-to-use Code of Conduct; SACOFF (247 member organisations, 25,371 churches, 5 million+ members).
- **National Security Strategy (2024–2028), released 15 July 2025:** lists the “mushrooming of charismatic churches” among prioritised national security threats and defines charismatic churches by their theology alone — evidence of religious targeting (ss 9 and 15).

Appendix: Case authorities and quotations

Verbatim quotes to have on hand. Introduce them naturally, one at a time.

- **Prince v President, Cape Law Society and Others 2002 (2) SA 794 (CC).** Ngcobo J: “Human beings may freely believe in what they cannot prove. Yet that their beliefs are bizarre, illogical or irrational to others, or are incapable of scientific proof, does not detract from the fact that these are religious beliefs for the purposes of enjoying the protection guaranteed by the right to freedom of religion.”
- **R v Sikunyana 1961 (3) SA 549 (E).** Consent is no defence to a dangerous religious practice: a dangerous practice superstitiously designed to secure the exorcism of an evil spirit “cannot be rendered lawful by the consent of the affected person.” Use against “but they consented.”
- **R v Heyne 1956 (3) SA 604 (A).** Fraud needs no financial loss: the prejudice must be “such as to involve some risk of harm, which need not be financial or proprietary, but must not be too remote or fanciful, to some person, not necessarily the person to whom it is addressed.” Use against “no one actually lost money.”
- **S v Bhulwana; S v Gwadiso 1996 (1) SA 388 (CC).** On section 36: “The more substantial the inroad into fundamental rights, the more persuasive the grounds for justification must be.” A sweeping limit on religious freedom needs overwhelming justification, which enforcement of existing law removes.
- **De Lange v Presiding Bishop of the Methodist Church of Southern Africa 2016 (2) SA 1 (CC).** The hands-off doctrine (entanglement): the State and the courts should be slow to intervene in religious doctrinal disputes, which should as far as possible be resolved within the community’s own structures.
- **The enforcement contrast.** Rabalago (“Prophet of Doom,” 2018): convicted after due process, the existing criminal law properly applied. Omotoso and co-accused: acquitted on 32 charges on 2 April 2025 for want of proof beyond reasonable doubt, the court criticising the prosecution; NPA granted SCA leave to appeal, July 2026. The law sufficed in both; only the enforcement differed.
- **The statutes already in force.** Sexual offences and child protection: Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007 (NRSO); Children’s Act 38 of 2005 (NCPR and mandatory reporting). Financial and other: Consumer Protection Act 68 of 2008; Prevention of Organised Crime Act 121 of 1998; Tax Administration Act 28 of 2011; General Laws (Anti-Money Laundering) Amendment Act 2022; Immigration Act 13 of 2002. CRL Act 19 of 2002, ss 5, 7 and 22.