



17 April 2025

To: The Director
Private Security Industry Regulatory Authority (PSIRA)
Email: Regulations@psira.co.za

Submission on the Draft Amendments to the PSIRA Regulations (Published 28 March 2025)

Dear Mr. Manabela Chauke

AgriSA wishes to thank the Private Security Industry Regulatory Authority (PSIRA) for the opportunity to submit comment on the proposed amendments to the PSIRA regulations, published in Government Gazette No. 52388 on 28 March 2025.

While we acknowledge and support the Authority's mandate to regulate the private security industry effectively, we write to express our deep concern regarding several provisions in the draft regulations, which — if implemented in their current form — would severely undermine the safety and security of rural communities and the broader agricultural sector in South Africa.

AgriSA represents a broad coalition of affiliated agricultural stakeholders across the country. For our members, rural safety is not an abstract concern but a daily challenge. In many parts of South Africa, particularly in isolated farming regions, private security companies serve as a practical first line of defense due to SAPS capacity limitations and response delays. The proposed amendments, particularly those relating to firearm restrictions, less-lethal equipment bans, and unrealistic compliance burdens, risk dismantling this fragile layer of protection. We respectfully highlight the following key concerns:

1. Unfair Firearm Restrictions (Sub-reg. 13A.(1)(j) & (k))

These clauses bar security firms under investigation, even without charges or findings, from issuing firearms to officers. This could easily be abused and may cripple security firms based on unsubstantiated allegations alone.

2. Operational Constraints in Public Spaces (Paragraph (q))

Restricting firearm use in public areas severely limits the effectiveness of armed response, especially where security officers must patrol shopping centres, transport routes, or community spaces. This disproportionately affects rural towns and villages.



3. **Vague Ammunition Limits (Paragraph (s))**
The undefined standard of a “reasonable quantity of ammunition” introduces legal uncertainty. Rural operations differ markedly from urban ones in their needs, this one-size-fits-all approach is both impractical and dangerous.
4. **Excessive Evaluations (Sub-reg. 13A.(8)(f))**
Mandatory annual medical and psychiatric assessments of armed officers, without clear guidelines or implementation criteria, place an undue financial and administrative burden on rural security firms already stretched thin.
5. **Restrictions on Semi-Automatic Rifles (Sub-reg. 13A.(12) & (13))**
Preventing use of semi-automatic rifles by tactical units hampers the protection of high-value and high-risk targets, including rural infrastructure, warehouses, transport vehicles, and farms vulnerable to large-scale attacks by heavily armed groups.
6. **Unrealistic Firearm Tracking (Sub-reg. 13A.(16))**
The proposed requirement for tracking devices in each firearm is currently technologically unfeasible and duplicates existing controls.
7. **Ban on Less-Lethal Tools (Sub-reg. 13B.(17))**
Prohibiting standard equipment like rubber bullets, water cannons, pepper spray, and Taser devices, while classifying handcuffs as “weapons”, removes crucial tools for de-escalation and crowd control. This undermines efforts to manage land invasions, strikes, and volatile protests lawfully and proportionately.

Contextual Justification

- **Crime Statistics & Farm Attacks**
SAPS data and crime trends show a continued escalation of violent crime in rural areas, including farm attacks, often perpetrated by multiple armed individuals. These realities must inform regulation, not be ignored by it.
- **Response Realities**
In remote areas where SAPS may take hours to respond, private security firms provide essential protection. During the 2021 KZN unrest, for example, private security companies were pivotal in stabilising critical infrastructure at the request of SAPS.
- **Regulatory Overreach**
The draft amendments appear to overregulate legitimate security providers rather than focus enforcement on criminal or illegitimate operations. Strengthening existing laws and addressing institutional corruption would more effectively eliminate the corrupt organisation than imposing broad, restrictive controls on the entire industry.



Conclusion and Recommendation

Agri SA urges PSIRA to reconsider the current draft in its entirety. We recommend:

- Withdrawing the proposed amendments in their current form.
- Engaging in a transparent, inclusive consultation process with relevant stakeholders, including organised agriculture, rural community representatives, and the broader security industry.
- Prioritising the enforcement of existing legislation to address rogue elements, rather than burdening legitimate providers.

We remain committed to constructive dialogue and would welcome the opportunity to contribute further toward a regulatory framework that enhances public safety without compromising rural security.

Yours sincerely,

Uys van der Westhuijzen

Chairman: AgriSA Centre of Excellence for Rural Safety

