



01 October 2021

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## **AMENDMENT OF ROAD TRAFFIC MANAGEMENT CORPORATION REGULATIONS, 2007**

### **1. Introduction**

We refer to the notice on the Amendment of Road Traffic Management Corporation Regulations, 2007, published by the Department of Transport on 03 September 2021.

We set out herein Agri SA's comments to the proposed plans as well as our recommendations in respect thereof (where relevant). You are reminded that Agri SA is the largest federation of agricultural organizations. Our mission is to promote agriculture in South Africa to encourage its development and to make it more profitable, stable and sustainable. Agriculture is the cornerstone of the South African economy.

### **2. General comments**

We acknowledge that regulations need to be reviewed and updated to provide for and align with changing circumstances. However, we must point out that these changes need to be done in a manner that's reasonable and equitable. Frivolous changes should be avoided at all costs.

### **3. Services**

We welcome the extension of services as indicated in regulation 2(3) (a)-(f). Because these services will be provided via an online platform, we trust that systems utilised by the DoT will be

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able to handle the requirements of an additional workload. The COVID-19 pandemic spectacularly identified the shortcomings in the existing provision of services and our members across the country are still plagued by dysfunctional road traffic testing centres and backlogs pertaining to the application and issuing of driver's licenses, etc. The introduction of these services is therefore welcomed but at the same time, it must be stressed that reliability is paramount and should not be compromised.

#### 4. **Fees**

As alluded to in the introduction, any changes made, need to be done equitably. This taking into consideration the economic reality, and fee increases should threaten the economic viability of payers. Premised on this we must note that agricultural sector is being hard-pressed from many sides. As it stands, the sector is feeling the pressure of elevated input costs (electricity, fertilizers, transportation, etc) and another line item increase would further exacerbate the situation, especially if the quality of the service rendered does not reflect the associated high cost. Our members are frequently on the receiving end of poor or dysfunctional authorities when it comes to the services that the DoT are supposed to render as part of its Constitutional commitments.

5. **Annual Increase**

We understand the need for an annual revision of transaction fees however request that provision should be made for an “annual revision” rather than an increase. The COVID-19 pandemic illustrated its tremendous effect on the economic sector and as such provision should rather be made for the annual revision of the transaction fees including a reduction in fees when circumstances require. Provisions in other legislation cater for consideration of circumstances within the definition and ambit of a disaster, which might find applicability. Increases, when necessary, should further be limited to a figure corresponding to the applicable CPI as determined by National Treasury.

6. **SCHEDULE 1**

In as far as the provisions of Regulation 3(1) are concerned and given the wide media coverage the applicable fee of R250 enjoyed, it is proposed that the relevant details of the fee are disclosed through supplementary promulgation of the Regulations as the current provisions are ambiguous and open for contradictory interpretations.

We would like to thank you for the opportunity to make input on the intended plans to amend regulations and whilst there are still a few areas of concern and confusion, we are committed to working with the department to ensure that workable solutions are reached.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Christo van der Rheede", written over a horizontal line.

Christo van der Rheede

Agri SA: Executive Director