

FINAL

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TOURISM BUSINESS COUNCIL OF SOUTH AFRICA'S (TBCSA) COMMENTS: DRAFT ROADS POLICY FOR SOUTH AFRICA

1. Introduction

The Tourism Business Council of South Africa (TBCSA) is an umbrella organization, which represents the unified voice of businesses in the Travel and Tourism (T&T) sector. TBCSA is a non-profit, private organization working to unite and influence the diverse Travel and Tourism private sector behind one core mission to contribute to a competitive, responsible and inclusive Travel and Tourism (and South African) economy. Our mandate is to serve the needs to our members who broadly constitute 20% of the sector's leading business enterprises and whose output represents 80% of the sector's overall economic contribution. In the transport and related spaces, these members are in the main, made up of airline associations, bus/coach operators, vehicle leasing and rentals, tour operators, events and exhibition associations as well as hospitality and accommodation sector. TBCSA serves to provide a VOICE to this community of businesses and to ensure that they play a constructive role in the country's economic development, growth and transformation.

The tourism industry contributes significantly to the GDP of this country. According to the World Travel and Tourism Council (WTTC), the industry directly contributed R 136.1 bn or 2.9% total GDP in 2017. The total contribution of Travel and Tourism to GDP was R412.5bn or 8.9% of GDP in 2017. The Travel and Tourism industry also contributed 9.5% of total employment or 1 530 500 total jobs or in 2017. This includes jobs indirectly supported by the industry. Visitor exports generated R126.7bn, which is 9.2% of total exports in 2017. According to the Statistics South Africa's Tourism Satellite Account, tourism outperformed the agriculture industry as one of the key industries contributing to the GDP. These benefits will accrue more as South Africa gets more tourist arrivals. According to Statistics South Africa, the volume of

foreign arrivals increased by 2,5 % when comparing January 2017 and January 2018. Sound and viable policies will see more increases in tourist arrivals and thence, economic growth.

The TBCSA welcomes the Draft Roads Policy for South Africa, some of whose policy proposals address part of the concerns that we had had as the Tourism Business Council. We believe that well maintained and sustainable road infrastructure will facilitate easy movement of people, especially tourists, between cities, and between rural and urban areas. Road infrastructure development will not only enhance the movement of tourists but will also assist upcoming small businesses in the rural areas in particular, and this will be in line with government's inclusive growth drive. As most of our tourists come from the region, we welcome proposals on the development of road infrastructure connectivity between South Africa and countries in the SADC region.

Our position is that a strong infrastructure base of a country is among the potential determinants of the attractiveness of a destination. This is more so given the fact that most of the tourists that come to South Africa are from the country's key source markets, who are accustomed to modern, efficient road and transport infrastructure. Such visitors expect to experience comfort, and any inconvenience in terms of the road infrastructure will force them to seek alternative destinations. Sound road infrastructure also enables tourists to access different parts of a destination and in this case, South Africa.

Our comments on the Draft Roads Policy are divided into two sections: General and Specific comments.

2. General Comments

We believe in urban-rural connectivity which would expose our tourism offerings and enhance our comparative advantage in terms of tourism experiences. Tourism has wild life /safari and nature experiences, which end up suffering because these attractions and locations are

located in areas that have poor road infrastructure. Therefore, we acknowledge the emphasis on infrastructure development and maintenance. We would like to raise the following matters:

- a. With the user pay principle, coordination of the development of non-tolled routes becomes of utmost importance, as it will provide alternatives which do not only save costs but are user-friendly and safe. This is especially important for domestic travel, given the current slow growth in the country as well as a decline in disposable income due to factors such as high food and fuel prices. Furthermore, in regard to the user pay principle, will the tolls be put for a specified period so that once the funds for infrastructure development have been recovered they could be eliminated?
- b. To what extent is the policy projecting growth in infrastructure in various rural and urban nodes, such as business centres and shopping malls, which would therefore necessitate the development of a roads policy that accommodates new development? This is especially important in terms of funding requirements. This aspect also includes effective design of roads which, although stated in the executive summary, is not expanded upon in the policy document.
- c. In terms of infrastructure maintenance, the Department needs to take into account overload control and the effect of that on the road infrastructure. This applies not only to trucks but mini-bus taxis as well. One of the issues that need to be taken into account by car manufacturers is whether the carrying capacity of public transport vehicles is taking into account issues of obesity of passengers, and the impact of this weight on the road surface.
- d. Furthermore, on infrastructure development and maintenance, the quality of material that is used for tarring roads should be checked, as this seems to have been compromised over the years. The roads in cities tend to get worn out quite fast, putting into question the quality of material being used to tar the roads.

- e. Integrated strategic planning is important in ultimately realising South Africa as a safe and economically viable destination. Strategic planning cannot be carried out by the Department of Transport alone, but should be a multi-stakeholder exercise, which should see alignment at not only the three spheres of government but also, across different relevant and affected government departments. We deem integrated planning to be important as planning is informed by data, and various role players have data at their disposal, which may even assist in projecting areas that require more road infrastructure.
- f. Policy formulation needs to be coupled with rigorous implementation as well as a robust and ongoing Monitoring and Evaluation. Implementation is an important ingredient to the success of this policy, as well as accountability. We note that the Draft Roads Policy makes mention of outcome-based monitoring and evaluation. This proposal is supported.

3. Specific comments on the Draft Policy

- g. In regard to reducing road accidents, it is our view that the 50% decrease in fatalities over a 14-year period up to 2030 as stated in the National Road Safety (2016-2030) is stretched too far, given that one death is one too much. As much as this is aligned to the NDP, we suggest a ten-year period if government feels they cannot work in line with the target of halving fatalities by 2020 (target set in the Decade of Action for Road Safety, 2011-2020).
- h. On road safety and improvement of road user knowledge, skills and attitudes, we suggest that evidence based programmes be put in place to deal with the causes of road accidents and fatalities. We are concerned as to whether the Accident Report Forms are a reliable source of data, which would provide nuances behind driver behavior?
- i. The executive summary makes mention of the fact that other funding sources for the road infrastructure could be looked at, such as the fuel levy. Whereas this could be a

- viable solution, we are of the view that money collected through the fuel levy should be ring-fenced so that we know that it is going to achieve the purpose for which it is being collected. In this way, accountability in terms of such money could be enhanced.
- j. Page 8 of the draft policy document refers to the challenge of inadequate law enforcement. We suggest that law enforcement corruption be looked into, as we have experienced cops who extort bribes from tourists. This phenomenon paints a negative image of South Africa as a destination whose rule of law is almost non-existent.
 - k. Page 30 of the policy document, section 5.1.1. under policy statement 2, the DoT, in reviewing the existing strategic road network, will consider “changes to significant SADC road corridors.” What kind of changes are these? We have an interest in this matter as the bulk of our tourists come from the SADC region and would appreciate if these changes could be made known so that we communicate them or make input into them accordingly.
 - l. The same section (5.1.1. policy statement 2) refers to a need to consider the Roads Needs Study which was completed in the 1980s. Are some aspects of this study not outdated and therefore important to consider recent studies or conduct a new study altogether?
 - m. Page 40 of the policy document, section 5.5.2., policy statement 22 refers to institutional arrangements amongst national, provincial and local authorities, as well as relevant stakeholders. It would be crucial to specify who these stakeholders will be and what their relationship with regard to road infrastructure issues are.
 - n. We notice that the stakeholders represented on the National Road Safety Steering/Coordinating Committee (RTMCC) are made up of government entities only. We believe that the private sector may have a role to play in issues of road safety, especially as it pertains to information or data that they may have at their disposal regarding crashes and fatalities, among others.

4. Conclusion

TBCSA submits that the effective implementation of the Draft Roads Policy is important for the South African economy. From a tourism point of view, well designed and maintained roads are important for destination image and improved attractiveness. This would necessitate that integrated planning be prioritised. We believe that all other factors being equal (visa regulations sorted, water availability, no health risks, etc.), improved infrastructure would contribute towards retaining the current tourists and attracting more into the country.

Yours Sincerely

Ms. Mmatšatši Ramawela
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