

30 AUGUST 2018

TOURISM BUSINESS COUNCIL OF SOUTH AFRICA'S (TBCSA) INPUT ON TRANSPORT MATTERS

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 of 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, the TBCSA serves as a voice to the Southern African Bus Operators Association, Southern Africa's Vehicle Rental and Leasing Association, Southern African Tourism Services Association (dealing with tour, shuttle and coach operators) Board of Airline Representatives of South Africa as well as the Airlines Association of Southern Africa. 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.

Services provided through the above-mentioned associations involve transporting international and local tourists either in and out of the country, to attractions country-wide and across international borders and neighbouring countries. The services also include ferrying people to and from conferences, between cities as well as transporting learners and students on educational excursions. These services contribute significantly to the economy of this country. However, there are policy related and systemic challenges that impede the operation of these businesses, which are discussed in the subsequent sections and need to be resolved as a matter of urgency. Some of these have been raised with the transport ministry in the past and to date, they remain unresolved.

2. Issues in the transport sector

2.1. Taxes and Regulatory Burdens

2.1.1. Operating Licenses

With the bus, coach operators and car rental sector, there is a challenge with Operating Licenses. The National Public Transport Regulator came into operation on 29th July 2016 with a new nationalised process of accreditation and license issuing being implemented. The announcement was at first welcomed by the tourism industry with promises of faster turnaround times and more tourism specific solutions than the previous provincial process. Unfortunately, in the roll-out of the process it became clear these promises were not going to be fulfilled. There are delays in finalising applications for operating licenses with the National Public Transport Regulator and Provincial Regulatory Entities. Calculations on requirements that needed to be considered such as the number of tourist vehicles/operators, the processing time of each application, and the number of staff and resources required were simply not done. Instead of launching the accreditation in a phased approach, as suggested by SATSA, the entire country had to immediately start compliance procedures. This resulted in NPTR commencing operations with an antiquated IT system, a severe lack of capacity, no processes or procedures in place and no communication to the industry apart from having the Provincial Regulatory Entities refer applicants.

From an engagement with our members, the main challenges can be summarised as follows:

- Lack of clear instructions/guidance on applications and requirements - no coherent or comprehensive description of exactly what is needed for the various types of applications;
- Requirements changing without any notice to the industry;
- NPTR Board rejecting applications without any bona fide reasons i.e. recommendation letters not strong enough to convince NPTR Board, support documents not clear and convincing and no proof that there is need for the type of service;
- Lack of communication to applicants on progress or outstanding documents, regardless of countless attempts to follow up either by telephone, email or visits in person;
- Inability to reach NPTR via telephone and no responses to emails, even emails from SATSA;
- Requests for meetings with SATSA not being actioned for 4 months;

- Misplacement of applications – Operators have visited and dug through the piles of paperwork themselves to find their applications themselves;
- Backlog of as many as 440 applications;
- Applications taking as long as 15 months to process, compared to the regulation requirement of no more than 60 days;
- Transfers/replacements/renewals taking as long as 2 months, compared to the regulation requirement of same day or next day turnaround;
- Operators already accredited and applying for additional vehicles waiting over 14 months;
- Applications for additional vehicles are now Board approved instead of issued by officials of the NPTR as stated in the regulations;
- With the delayed application process documents submitted expire and operators have to submit again when their applications are finally processed, holding up the process even longer;
- NPTR Board and adjudicators do not have tourism experience and lack understanding of the industry;
- Length of accreditation is at the discretion of the Board. Accreditation is issued between 2 and 5 years based on how 'new' the business is (shorter period for new businesses), however no guidelines or communication is provided on this;
- Unrealistic requirements including the newly added request for 5 endorsement letters (3 for operating within the province and 5 within the borders of RSA), even for new entrants;
- B-BBEE certificates must be submitted and according to hearsay, applications without B-BBEE certificates will not be processed;
- National Licenses (which was initially promised for all tourism applications) has fallen by the way-side and operators must apply per route/province. Even when they are submitting for national it is declined and they only receive provincial. Licenses are issued with stipulations such as pick-up radius 30 / 50 km from place of business. This would for instance not allow an operator from anywhere outside of Gauteng to collect at OR Tambo International. Currently these operators are blocked from entering the airport for pick-ups. NPTR bases some of their route decision on the reference letters supplied, but this is not communicated, and no guidance is provided on what these reference letters should

incorporate. Tourism is a not radius or area-based service and differs from minibus taxi-type service or scheduled service;

- We raised concerns about these matters in a meeting in Mpumalanga and statements contradictory to the communique from the Department of Transport were made about the regulations in that meeting;
- Non-issuing or delayed issuing of receipts as well as date discrepancies when receipts are issued. Receipts shows the delayed date of issuing by NPTR instead of the date of application and payment. Non-issuing of receipts or date discrepancies on receipts particularly affects renewals. Section 25 (2) of the regulations states that where an application for renewal was done within 30 days of expiry and where the regulatory entity has not issued the license by the expiry date, the original license remains valid until the entity either issues or refuses the renewed license. However, the operator must keep the receipt as proof of application. This cannot happen when receipts are not issued and when the date on the receipt shows the NPTR issuing date and not the actual date of application and payment - voiding applications made in time - 30 days before expiry;
- To complete applications for additional, new or replacement vehicles the operator must purchase the vehicle and comply with requirements such as insurance before they know whether they will be granted a license. When combined with delayed approval and issuing this results in high costs;
- NPTR unable to issue charter permits resulting in confusion between NPTR and PRE;
- The manner in which the provinces set the licensing fees also differ from one province to another, with KZN being the most expensive and Mpumalanga being the cheapest.

2.1.1.1. Case studies

A sample of case studies (of which we can provide many more) highlight some of the challenges experienced by operators when engaging with the NPTR. Case studies include large and small businesses who have both been successful and those who continue to struggle to obtain operating licenses. Apart from Company A, no names of operators have been provided to protect their interests.

Company A - Tours for South Africa, Mario Febbraio (as per the letter to Minister of Tourism)

Annual Turnover: < R5 million

Number of staff: 35

Number of vehicles: 28

Tourism is my business. Not only am I perusing growth in our industry but have 35 staff that benefit from this company, not even to mention the spinoffs everyone else enjoys in my efforts.

I bring people from all over the world, they come and spend their money with us. I travel abroad at least once a year (on average twice a year) attending travel shows, organising my own roadshows, spending huge amounts of money, all to grow tourism and my company.

There is no other way to make it successful. One builds relationships locally and abroad and delivers a superior service. One's company grows on its own as people return to or refer your company. Growth is evident. Unfortunately, growth requires services like the NPTR to be on a parallel and have the vision to grasp the bigger picture.

The attitude as received by myself and many others in the industry is, "Let's see if you can get it," rather than "How can we be of assistance?". The NPTR is throttling the tourism industry, preventing growth and future existence of many companies.

Company A has experienced the following challenges:

- *Rejection of new application a year post submission date. Based on the information received, it was evident that the NPTR had come to a decision two months earlier than when feedback was provided.*
- *The reason for not granting the new application for an additional permit was that the support letters were not substantial enough. However, the support letters include, amongst others, testimonials from Cullinan Holdings (Hilton Ross, Springbok Atlas, Ikapa - letter signed by the CEO himself), Mega Coach and various other establishments.*
- *Additional company expenditure. Company A had to appoint an outside consultant to take up the load of NPTR applications due to ongoing demands from day-to-day company operations. Turnaround time for new applications is on average a year, with Company A's last renewal taking 8 months. There are currently another 9 outstanding renewals submitted in February with no response.*
- *To get a simple receipt from the NPTR after money has been paid over, is a huge effort and can take up to 2 months for the issue of a document. The receipt allows you to continue operating while your renewal is being processed. Company A has vehicles standing idle owing to not having a receipt. Company A is now forced to incur costs to hire in vehicles to meet the demands of clients.*
- *The license authority as issued by the Provincial Regulatory Entity (PRE) was changed on the renewals received. According to the act the NPTR has to recognise the permits/ operating licenses as issued by the PRE.*

Company B

Annual Turnover: > R200 million

Number of staff: 650

Number of vehicles: 400

We were advised that the new NPTR permits will replace the old and the terms and conditions will remain, this has not been the case. We had National now specified to a city as well as a radius around that city. We were approved for charter service, no longer the case.

Once an operator has been accredited the process to request and receive a new OL should be quick and painless, yet this is not the case. The list of forms (as per the check list) includes many forms that have already been handed in to become accredited? And I see a new point (B-BBEE exemption affidavit; Certified Copy of Black Economic Empowerment and Employment Equity compliance certificate) has been added with no explanation as to why this is required at all, especially once you have been accredited. Applications are received but will not be processed until you submit B-BBEE document. That is unconstitutional – BEE is not compulsory in SA.

In my opinion the NPTR do not have the required technical skills to perform the necessary inspections as per the act.

Currently we have permits approved for one of our divisions, but we have to change the registration numbers to Gauteng. Permits will only allow us to operate in Gauteng. Why can't they issue it to start any place within borders of South Africa?

We applied for permits for Hazyview. They approved 4 permits, and then they refused other Hazyview permits due to insufficient motivation. These applications were done exactly as required.

On the 3rd August 2017 we applied for 5 new permits and accreditation for another division. We have had no response to date.

Renewal applications for yet another division were submitted and rejected on the grounds of support documents not clear and convincing and no proof that there is need for the type of service.

The renewal of permits is a very lengthy process. Whilst we have seen an improvement at the NPTR office with regards to being more helpful and processing applications slightly faster, all applications must go to Board for adjudication. Old permits with charter on it are postponed and referred back to Provincial Regulatory Entities. The application then goes back to the Board. Why can't NPTR issue national charter permits? We are not allowed to have a charter and tourism permit on our vehicles. Why?

Our problem is the NPTR Board, they do not understand our business (tourism) and national permits.

Company C

Annual Turnover: < R5 million

Number of staff: 5

Number of vehicles: 3 x 28-seater vehicles

Company C operates as a day bus tour operator based in Knysna, Western Cape, covering the territory between Mossel Bay and Jeffreys Bay – i.e. distances of up to 300km per day. We currently have 3 buses comprising 28 seats plus drivers. All the buses are roadworthy at the PDP level. Our drivers are also Code 10 licensed with PDP's.

We carry passenger liability of R1 million per person and the vehicles are comprehensively insured.

We applied for the licenses of these vehicles in the first week of December 2017. We received an acknowledgement within a few days confirming receipt and requesting more references from known operating associations. We obtained these and submitted them by 21st December 2017. We paid the monies requested to the NPTR which was receipted on 28th December 2017.

From early January 2018 we had been in email and telephonic contact with the department. Almost all the emails went unanswered. Most of the telephone calls (one got answered out of 20) were answered by a person who could not or would not provide any answers as to the progress of our permits.

In desperation I was able to make contact by email with Michelle Phenya, PA to the Director General, who instructed Rejoice Nchabeleng to respond to us which she did on 23rd March 2018. We were informed that our application was being gazetted and that they would be in touch with us once the publishing dates had been completed. This continued through to May with no further response from her. I then had a business trip to Gauteng and I personally visited the Department of Transport in Pretoria and managed to meet with Rejoice who promptly informed me that my application was in a batch of some 440 applications and that they were currently un-operative because the department had no money to pay the government gazette. Furthermore, the new budget which was supposed to have been made available in March 2018 had still not been accessed by May 2018, and therefore no progress was expected in the near future. I contacted the department again at the end of May and received a one-line response from Selby Ditshego as follows: "Please note that your application for new operating permits lodged with the NPTR was scheduled to be adjudicated on 24 May. Unfortunately, due to time constraints and high number of applications, your applications were deferred to the next adjudication meeting to be held on an unconfirmed date in June".

As of 27th June 2018, there has been no further communication from the department.

My biggest worry as a business-owner is insurance. Our insurance company has informed us that if we continue to operate the vehicles without the operating licenses (irrespective of if we are in possession of a receipt) that we will not be covered for incidents during this time.

Company D**Annual Turnover: R23 million****Number of staff: 14****Number of vehicles: 4**

I applied for accreditation in April 2017 and was asked 3 times to resubmit documents I had already submitted. I received a receipt on 1 June 2017. I finally received accreditation in December 2017.

Meanwhile I applied for a replacement operating license when I bought a new vehicle in August and waited 3 months for it.

Based on all the problems experienced by so many operators, I am now very reluctant to replace my vehicles. Instead of replacing them every 3 years (which would stimulate the economy and keep tourists safe in newer vehicles) I have decided to keep our vehicles for as long as possible (up to 10 years if necessary) while I wait for this disastrous NPTR to be dissolved and replaced with something that works.

Company E**Annual Turnover: < R5 million****Number of staff:****Number of vehicles:**

At the beginning of 2017 I was offered a good deal to trade in my old Toyota Quantum for a much newer model. I made the trade in and went to the local Department of Transport in George to transfer the OL that I had. This used to be a simple task but it was there that I was told that I had to go through NPTR.

13th June 2017 - I submitted all my paperwork and paid my fee to NPTR. My application was effectively a transfer and renewal of the my old OL across to the new vehicle and if possible to increase the operating area to include not just the Western Cape but also the Eastern Cape (as the Garden Route straddles the border of the 2 provinces at Tsitsikamma). I received what appeared to be an automated response that my application had been received.

25th August 2017 - I made enquiries into how the process was going. The reply came back that it takes 60 - 90 days.

22nd September 2017 - I enquired again, only to be asked what my application number was and who was dealing with my application (both of which were never given to me).

9th October 2017 - Another enquiry - no reply.

20th November 2017 - Another enquiry - no reply.

Early 2018 - SATSA got involved and I believe that through their assistance I received a response from NPTR that said that the "Statement of Oath Regarding Previous Convictions" should not have been in my personal name but rather the company name. I immediately sent

the relevant form back and they acknowledged that they now had all my paperwork in order. I was excited that things seemed to be moving forward and that someone at NPTR was now reading my application.

I have heard nothing in the last 4 months. It has been over a year since I made my application.

2.1.1.2. Initiatives to address the problem

Numerous meetings have been conducted with the NPTR and Department of Transport – initially to give tourism sector input and assistance and subsequently to try and address the challenges faced by industry. After a total breakdown in the relationship, SATSA requested the assistance of the Department of Tourism who facilitated a meeting with NPTR in September 2017. During this meeting the NPTR admitted to the capacity constraints they were facing. They reported that approval was received from Treasury for the addition of 17 new staff members, that approval for the development of a new IT system was received, that they had increased the frequency of the NPTR Committee/Board meetings to process applications and that they would develop a handbook to clearly communicate the application process and requirements.

As far as SATSA could establish, some new staff members did commence work, service delivery has slightly improved at the NPTR office, and the Board is now meeting once a month instead of the once a quarter meeting as was the practice previously. However, as per SATSA's understanding, only about 10 applications are processed at a time at such a Board meeting. No further updates were received regarding the new IT system and to date no handbook has been developed to assist with communication.

Following complaints from NPTR that operators are not submitting comprehensive applications, SATSA communicated the process for applications and description of the requirements (as we understand it) to all its members and now acts as an intermediary to its members with regards to receiving and verifying the correctness of all new applications. An endorsement letter, which the operator submits together with the completed application, is provided by SATSA once the application has been verified. The aim is to ensure some type of priority status with NPTR.

To further assist members, SATSA developed a tracking sheet to list member applications submitted previously and highlight the challenges experienced. A total 50 operators provided details for the tracking sheet with some applications dating as far back as 2016 with no movement to date. The list has been submitted to the NPTR on various occasions with official feedback received only twice so far.

Receiving feedback from the NPTR can take anything from 10 days (a positive start when the tracking list was first implemented) up to 3 and more months.

A total of 10 applications on the tracking sheet was successfully concluded. Out of the 10, one applicant had applied in November 2016 and only received accreditation and renewal on 14th February 2018. According to SATSA's feedback reports from NPTR regarding the application process, the application did not have any outstanding documents nor had the applicant needed to correct any errors and yet it still took 15 months to process. Of the 50 operators, 9 operators applied in 2016 with only the one being successful. This far exceeds the stipulated timeframe indicated in the Act.

The most recent tracking sheet for all application dates was sent through to the NPTR on 30th May 2018 and SATSA is yet to receive feedback. SATSA is also intimately involved in the self-regulation of Open Safari Vehicle (OSV) permitting in partnership with SANParks. For this project there are a total of 134 Operating License applications pending.

2.1.1.3. Perceived contraventions of the National Land Transport Act, 2009

We have outlined what we perceive as possible contraventions of the National Land Transport Act of 2009 by the NPTR:

National Land Transport Act, 2009 (Act No 5 Of 2009) National Land Transport Regulations:

- Section 2. (3) The NPTR must issue a receipt **on the day of receipt** or if received over a weekend or on a public holiday, on the next working day

- Section 4. (1) The members of the NPTR must meet often enough to enable the NPTR to consider and process applications concerning operating licenses or for accreditation of operators within **no more than 60 days** of receipt of the application
- Section 14. (2) Subject to the Act and the other provisions of these regulations, the operating license issued to replace a permit **must confer the same authority** as the permit
- Section 25. (5) Regulatory entities must **send a notice of renewal** to operators not less than 60 days before their operating licenses or permits will expire
- Section 32. (1) The NPTR must consider the following when deciding whether to grant or refuse an application for accreditation: (a) Whether the applicant complies with section 81(2) of the Act, and these regulations, based on the applicant's past record as an operator, *inter alia* as regards to safety and compliance with legislation, but without **discriminating against operators who are new** in the industry
- Section 32. (4) Where, after evaluating the application, it appears to the NPTR that an applicant does not qualify for accreditation the NPTR must **furnish the operator with the reasons** for non-qualification
- Section 35. (2) An accredited operator may apply for certification of additional vehicles under section 84 of the Act. (4) On receipt of such an application for certification, an authorised official of the NPTR must verify the validity and authenticity of the documents and matters submitted by checking eNaTIS and by other acceptable means and, if satisfied that the vehicle complies with section 84 (3) of the Act, **must certify the vehicle**
- Section 36. Operating licenses for tourist transport operators (5) (b) the area within which the vehicle may be operated, which **may be the Republic as a whole**
- Section 38. (1) If satisfied that the applicant is accredited and that the vehicle complies with the requirements set out in regulation 32 (1), the competent official of the NPTR must issue the operating license to the applicant the **same day** if the application was lodged before 12:00, or **on the following day** if it was lodged on or after 12:00
- Section 38 (3) Such an operating license may be **issued electronically**, in which case a printout of the license must be kept in the vehicle at all times while it is operated for tourist transport services until receipt of the originals

National Land Transport Act, 2009 (Act No 5 Of 2009) No 32110:

- Section 21 (6) As soon as possible after its appointment, the National Public Transport Regulator must formulate an implementation plan for establishing the entities required by this Act and for **capacitating** them, and for implementing the other provisions of this Act.

2.1.1.4 Consequences of the Problem

Tourism Vehicle Operators are desperately trying to follow the process but are not able to obtain licenses. The delays have a major impact on operators as the buses and coaches may not be used without operating licenses whilst monthly payments have to be made for the purchased vehicles. This in turn causes car rental companies not to re-fleet and de-fleet their vehicles. The new vehicles are forced to be kept in garages for long periods until vehicle licenses are obtained. The operators cannot generate income or hire additional or freelance staff because vehicles can't be operated, being forced to operate illegally, vehicles with tourists onboard being impounded by traffic officers.

Sometimes there are delays in printing of the operating licenses, and the signing thereafter by an authorised person. This results in financial losses for operators. The whole matter has a growing and hugely negative impact on the growth of tourism and job creation across South Africa.

2.1.2. Taxes

Among tour and shuttle operators, there is a string of taxes that are burdensome to both sectors. For example, there is a fuel levy which gets to go up every year, the Road Accident Fund, the customs and excise levy (based on the price of a vehicle), the vehicle taxation (which has a specific tax on carbon dioxide emissions of new passenger motor vehicles) and road licensing fees. There is also the value added tax which is imposed on all motor vehicle sales. The new and re-treaded pneumatic tyres, the disposal of which pollutes the environment, are subject to an Environmental levy, if used in South Africa. This creates a financial burden for bus, shuttle and coach operators.

2.2. Safety and Security

There are issues of safety and security which may affect domestic tourism. The taxi violence that took place in June is a case in point. The conflict between Uber and metered taxi drivers needs to be ultimately resolved and the resolution communicated as it may affect movement of tourists in different provinces.

There is also intimidation of bus operators by taxi operators. This is especially prevalent at ranks and termini being used by both bus and taxi operators. Intimidation is experienced in the following ways:

- Passengers are instructed by taxi operators to disembark from buses and use taxis instead;
- Bus drivers are instructed by taxi operators to depart without passengers;
- Taxi operators regulate the number of buses and trips to be undertaken by buses;
- Bus drivers have to pay “ranking fees “to taxi operators before they are allowed to depart.

Southern African Bus Operators Association (SABOA) has made numerous attempts to resolve this matter but without much success. Attempts that have been made by SABOA to address taxi intimidation include, inter alia:

- Raising the matter with the previous Ministers of Transport.
- Raising the matter with the previous Ministers of Police. It was agreed to establish a Stakeholder Forum but this never materialised.
- Raising the matter with Independent Police Investigative Directorate.
- Raising the matter with the Public Protector.
- Raising the matter with the National and various Provincial Departments of Transport.
- Raising the matter with the taxi associations, SANTACO and the NTA (facilitated by the Department of Transport).

There could be more cases of intimidation than have been reported, as SMME bus operators are reluctant to report cases due to threats of intimidation by taxi operators. SABOA wrote a letter to Minister Nzimande on this matter. A meeting to discuss this is yet to be secured.

2.3. Roadworthiness certificates

The department of transport has changed the policy regarding obtaining a roadworthiness certificate to a six-month period. Whereas the industry supports this policy, the administration of roadworthy testing in conjunction with vehicle licensing has created circumstances that result in financial implications for all operators. Buses undergo roadworthy testing bi-annually, whereas the validity of a license disk is 12 months. Because the validity of vehicle roadworthiness is six months, normally, six months into a vehicle licensing period a certificate of fitness is issued, which warrants that operators must get a new license disk that reflects both the roadworthiness of a vehicle and the normal license. This compels the operators to renew their vehicle license by paying a pro-rated amount for a new vehicle license, before the old one actually expires. This practice is done in all the provinces except for the Western Cape, where vehicle operators are not required to pay a pro-rata amount, but to only produce receipt of roadworthiness as proof of bi-annual testing. The pro-rata fee sometimes is equivalent to 50% of the annual license fee in vehicles that are new. This practice has serious financial implications for operators with multiple vehicles, as well as SMMEs. We therefore propose that the previous practice of displaying two separate discs for vehicle license and roadworthiness be reassessed and reinstated. This would address the negative consequences of dual administration of the vehicle license and roadworthiness and the subsequent pro rata system.

2.4. Chambers for transport sectors

Coach operators believe there should be a separate chamber representing the non-commuter sector of the transport and the tourism industry. The nature of coach operations is notably different to that of the commuter industry, yet this is not recognised and addressed by the relevant parties. The matter was discussed at the South African Road Passenger Bargaining

Council (SARPBAC) early in 2016, however, organised labour raised objections to separate chambers and there has been no further progress.

2.5. Infrastructure

The state of roads in South Africa is appalling, especially in rural areas, where some roads are not developed, whereas in some instances, there are potholes. This prevents tourists from visiting these areas because accessibility is a major problem. Mpumalanga has been vocal regarding this challenge. Business revenue has been lost due to lack of accessibility to the tourist attractions. The Department is therefore requested to deal with this challenge. From a tourism point of view, well designed and maintained roads are important for destination image and improved attractiveness.

3. Proposed Solutions

Possible solutions are summarised as follows:

- A moratorium to be implemented with immediate effect to allow operators who have made legitimate applications to NPTR to continue operating vehicles whilst the NPTR challenges are addressed;
- Allow an industry body to self-regulate, similar to the very successful OSV self-regulation project implemented in a partnership between SANParks and SATSA. This is provided for in the National Land Transport Act, 2009, Section 82 (3) If the National Public Transport Regulator is satisfied that any national tourism body has an acceptable system in place to accredit operators of tourist transport services, the National Public Transport Regulator may accept such accreditation by such a tourism body without requiring the operator to apply in terms of subsection (1), provided that the operator also complies with the prescribed technical requirements;
- Decentralise the regulation process, reverting to using the Provincial Regulatory Entities to issue new licenses, renewals, and replacements. NPTR can handle applications and accreditations of dysfunctional PRE's;

- Provide an opportunity for the industry or another knowledgeable independent body, to have a permanent presence on the NPTR Board;
- Appoint individuals with in-depth tourism transport knowledge to the NPTR Board
- With immediate effect, capacitate the NPTR with sufficient staff, systems, processes and resources to appropriately and timeously deal with all new applications and the current backlog.

Yours Sincerely

Mr. Tshifhiwa Tshivengwa
CHIEF EXECUTIVE OFFICER
Tourism Business Council of South Africa