

To: Mr. Bonile Malila
Chairperson: National Public Transport Regulator (NPTR)
Department of Transport
Pretoria, South Africa

From: Oupa Pilane, Chairperson: Southern Africa Tourism Services Association ("SATSA")

Date: 19 November 2025

RE: INPUTS AND SUGGESTIONS ON THE STREAMLINING OF ACCREDITATION AND OPERATING LICENCE PROCESSES FOR TOURIST TRANSPORT SERVICES

Dear Mr. Malila,

We write in response to your letter dated 5 November 2025, inviting stakeholder input on the streamlining of accreditation and operating licence processes for tourist transport services.

The input below has been compiled based on feedback from the broader tourist transport industry over a number of years and is supported by the broader industry. This would be evidenced by a consultative process which considers all the relevant issues. It should therefore be regarded not as a single submission, but as multiple equivalent submissions from various operators across the sector.

While it is understood that the NPTR is required to consider operations within legislative amendments, it is critical that it recognise the serious nature of the failings in the system to date, and this needs to be seriously considered and rectified prior to further administrative constraints being placed on the sector.

Background and Observations

We wish to place on record the following critical observations, which provide context for our recommendations:

- The wording, interpretation, and implementation of the National Land Transport Act (NLTA), Act 5 of 2009, as amended by Act 23 of 2023, and its associated regulations have diverged significantly from the original legislative intent. In our view, and that of our legal advisors, the current processes and standard operating procedures adopted by the NPTR are inconsistent with the provisions of the Act and have materially harmed the tourist transport sector in South Africa.
- Since its inception, the NPTR has **consistently failed to meet the turnaround times** stipulated in the legislation. Severe backlogs and operational inefficiencies have led to delays of many months—and in numerous cases, **over a year**—and in several cases, **over two years**, even for straightforward renewal applications by already accredited operators.
- While we welcome the NPTR's acknowledgement that "operations of tourist transport services are distinct from other service types" and that accredited operators should benefit from a "simple and expedited" licensing process, this principle has **not been reflected in practice**. On the contrary, the process has become increasingly **burdensome, duplicative, and opaque**, with ever-growing

documentation requirements and frequent rejections on minor technicalities. Accredited operators have to go through the identical licensing process as other non-tourism operators. There is currently no benefit to the rigorous accreditation process.

- Further to the burdensome administrative constraints and inefficiencies in the NPTR operations, a lack of understanding of legislative requirements, (NLTA and other legislation), has resulted in processing officials not accepting certain documents, which meet the scope of legal requirement. In addition, the number of requests for resubmission of documents is significant.
- These systemic failures have caused **significant economic and reputational damage** to the tourism industry, undermining South Africa's competitiveness as a global destination and eroding trust in the regulatory framework.

Position on Legislative Enforcement

Given the NPTR's current track record, it is our view that **no further enforcement or expansion of legislative provisions** under the NLTA should be pursued until the regulator demonstrates a clear and consistent ability to implement the existing provisions **efficiently, fairly, and in line with the Act's original intent**.

Specifically, we urge the **NPTR to prioritize internal reform** to meet the legislated turnaround times:

- **60 days** for accreditation and first-time operating licence applications
- **14 days** for any application by an accredited operator

Until these benchmarks are reliably met, the introduction of additional requirements—however well-intentioned—will only exacerbate existing inefficiencies and **deepen the crisis** facing the sector.

Inputs on Specific Proposals Requested by the NPTR

5(i) – Proposed Timeline for Accreditation

We propose a timeline of **90 days from any future date** when all accreditation applications can routinely be processed and completed within the legislated 60-day turnaround. Until the NPTR demonstrates consistent compliance with this standard for at least three consecutive months, **no pressure should be placed on operators to comply** with mandatory accreditation timelines.

5(ii) – Classes and Maximum Number of Vehicles per Operator

We strongly recommend that this clause be **scrapped in a future amendment**. The number and class of vehicles operated should remain a **commercial decision**, not a regulatory constraint. No other sectors—whether taxi operators, hoteliers, or retailers—are subject to such arbitrary limits. There is no reason to limit growth of the tourism sector, especially when Cabinet has marked tourism as a priority growth sector, and the new Electronic Travel Authorisation ("ETA") will significantly increase the number of tourists arriving in South Africa (who will need to be transported).

5(iii) – Recommendation Letters from Tourism Authorities

We propose that a **single recommendation letter** from any one of the following membership-based industry associations be accepted; including but not limited to SATSA (Southern Africa Tourism Services Association), MISA, ASATA, GaTOA, FGASA, and NFTGA.

However, in line with **Section 81(6)** of the NLTA, the **absence of such a letter should not delay or invalidate an application**. Furthermore, we propose that **SATSA be formally empowered under Section 82(3)** to accredit tourist transport operators on behalf of the NPTR, using agreed-upon criteria. This would significantly reduce the regulator's workload and improve turnaround times.

5(iv) – Tests, Examinations, and Training Requirements

This is already addressed in existing legislation. We propose that this clause be **removed in a future amendment**. No other transport sector faces such requirements, and the NPTR lacks the capacity and tourism-specific expertise to administer or evaluate such programmes. Existing requirements—such as roadworthy certification, valid driver's licences, Professional Driving Permits, and tourist guide qualifications—already ensure passenger safety and service quality.

5(v) – Vehicle Suitability for Tourist Transport

This is already addressed in existing legislation. Any vehicle **licensed to carry passengers for reward and certified roadworthy** should be deemed suitable. The inclusion of this clause represents **duplicative regulation** and should be removed in future amendments.

Comparatively, tourists may undertake a wide-range of activities such as quad biking, cycling or horse riding which could be viewed as more risk-orientated activities. These activities do not require a special licence, accreditation or approval. Therefore, we maintain that being transported in a roadworthy, compliant vehicle with the correct licences and adherence to regulations when transporting persons for reward – is a safer activity and should not encounter the burdens of additional regulations.

Conclusion and Call to Action

Our appeal to the NPTR is to **prioritise efficiency, simplicity, and improved turnaround times** before implementing any new or additional provisions. In the long term, we urge the NPTR to work collaboratively with the tourism industry to **redesign and simplify the regulatory framework**, ensuring it is fit for purpose and aligned with the realities of a dynamic, service-oriented sector.

We thank you sincerely for requesting and considering our input. We trust that our collective submission will be taken to heart and lead to meaningful reform.

Yours sincerely,



Oupa Pilane
Chairperson
SATSA