1. WITH REGARDS TO LIMITATIONS POSED BY :
   1. R30 MILLION CEILING
   2. 200 MINIMUM NUMBER OF MEMBERS

**SUBMISSION : TO THE DISCUSSIONS ON THE AMENDMENT TO THE COOPERATIVES BANK ACT 40 OF 2007: BY WEALTH CREATION GLOBAL IN CONSULTATION WITH AND REPRESENTING THE FOLLOWING GROUP/S**

1. COOPERATIVE GROUPS FROM RURAL & URBAN RURAL COMMUNITIES
2. RURAL COMMUNITIES IN THE PROVINCES OF :
   1. Eastern Cape: Emalahleni Region: Villages of :, Ngqanda, Dubeni, Bangindlala,kwa-Mhlontlo; ORTambo Region:- Traditional Authority of kwaLuphindo-
   2. umbrellaGauteng : Cooperative Bodies organised under Wealth Creation Global

**SUMMARY OF RECOMMENDATIONS-SUBMISSION**

1. OUR SUBMISSION TO THIS REGARD IS: **SCRAP THE COMMON BOND REQUIREMENT COMPLETELY,** IT IS NOT ENABLING NOR ENCOURAGING OUR COMMUNITIES TO WORK TOGETHER IN THE FORMATION OF INITIATIVES AIMED AT SELF-DEVELOPMENT.
2. **DISSOLVE CBDA WITH IMMEDIATE EFFECT**
3. WITH REGARDS TO LIMITATIONS POSED BY :
   1. R30 MILLION CEILING (MAXIMUM FOR AN ENTITY TO BE REGARDED AS COOP BANK)
   2. 200 MINIMUM NUMBER OF MEMBERS (REQUIRED TO FORM COOP BANK)

**It is our humble request to PARLIAMENT TO SCRAP THESE LIMITATIONS AS THEY REALLY ARE NOT HELPING US BUT ARE AN UNNECESSARY BARRIER TO ENTRY NOT ONLY IN THE FINANCIAL SECTOR BUT IN ALL SECTORS OF BUSINESS**

Overview

The Cooperative Banks Act 20 0F 2007 in its PRESENT FORM JUST FROM THE PAPER is a NON-STARTER WHICH SEEKS TO ENSURE THAT AS BLACK PEOPLE IN THIS COUNTRY WE ARE NEVER ABLE TO MEANINGFULLY ENTER, PARTICIPATE AND FULLY OWN ANY SIZEABLE STAKE IN THE BUSINESS SECTOR IN GENERAL AND THE FINANCIAL SERVICES/BANKING SECTOR IN PARTICULAR. THIS IS DEMONSTRATED BY AND ENSURED IN THE STRINGENT AND MOSTLY UNNECESSARY BARRIERS THAT ARE CONTAINED IN/UNDER THE SO CALLED “MINIMUM REQUIREMENTS” WHICH POSE BARRIERS LISTED BELOW:

1. Common Bond: Why must this be a requirement for a CFI WHEN IT IS NOT A REQUIREMENT FOR- Std,Absa Nedbank,Capitec and any other White Foreign owned Business or Commercial Bank. The Constitution of South Africa makes provision for FREEDOM OF ASSOCIATION, yet this requirement that is enforced by and through CBDA is an infringement upon that right.
2. OUR SUBMISSION TO THIS REGARD IS: **SCRAP THE COMMON BOND REQUIREMENT COMPLETELY,** IT IS NOT ENABLING NOR ENCOURAGING OUR COMMUNITIES TO WORK TOGETHER IN THE FORMATION OF INITIATIVES AIMED AT SELF-DEVELOPMENT.
3. It is our humble request to PARLIAMENT TO SCRAP THESE LIMITATIONS AS THEY REALLY ARE NOT HELPING US BUT ARE AN UNNECESSARY BARRIER TO ENTRY NOT ONLY IN THE FINANCIAL SECTOR BUT IN ALL SECTORS OF BUSINESS E.G:

2 **. DISSOLVE CBDA WITH IMMEDIATE EFFECT** AS IT IS NOTHING BUT A WASTE OF MONEY,TIME AND RESOURCES WHILST IT IS EFFECTIVELY USED TO ENSURE WRONGFULLY PROTECT THE INTERESTS OF THE “BIG FOUR BANKS”, THEREBY CREATING AND PROTECTING MONOPOLY WITHIN THE FINANCIAL SERVICES-(BANKING SECTOR)…

…. “UCBDA NGUMQOBO NJE OBEKIWEYO NGABELUNGU UKUQINISEKISA UKUBA INGCINEZELO YESIZWE ESINTSUNDU IYAQHUBEKA NGAKUMBI NAKUBA URHULUMENTE SELE ENOMONGAMELI OMNYAMA,UKWENZELA UKUBA THINA SIZWE ESIMNYAMA SISALE SINYEMBANA KWASODWA,SISILWA NGETHAMBO ELINGENANYAMA LOGAMA ABELUNGU BAHLOHLA EZABO IINGXOWA ,BEZAKUTHI BESAKUGQIBA BAWELU’LWANDLE NENGENISELO YOMHLABA WEZWE LETHUBESISHIYA PHOFU SIHLUPHEKILE , ENDLALENI, SESILWE SAGQEBHANA SODWA NGENXA YALEMITHETHO YABELUNGU, EYENZELWE ABELUNGU”..

…”INGUMQOBO NJE KUPHELA OWENZELWE UKUQINISEKA UKABA IMIQOBO EQULETHWE KULE ACT EYAYIBHALWE NGAPHANDLE KOKUVA IMIBONO YETHU IYAPHUMMELELA, MIQOBO LEYO ENJONGO ZAYO IKUKUVIMBA THINA SIZWE –SINTSUNDU UKUBA SINGAZE SIBENAWO AMABHANGE…

The CBDA as established under S55 of the Act does not add value nor does the section under which it is established shows any piece of evidence that by establishing CBDA it purpoted for the institution to drive and encourage development in the sector specifically and economic development in general . Listed below are the “functions” of CBDA as prescribed/stated under S55. From the 1st up to the 10th function there is not even ONE MENTION OF THE WORD DEVELOPMENT…ASK YOURSELF A QUESTION …WHY? WHY IS THERE NO MENTION OF DEVELOPMENT IN AN INSTITUTION THAT IS CALLED “DEVELOPMENT AGENCY’…THE ANSWER TO THIS QUESTION AND FOR US ALL IS CLEAR…CBDA WAS ESTABLISHED FROM INCEPTION TO ENSURE THAT THE COOPERATIVE BANK INITIATIVE NEVER TAKES PLACES AND OR NEVER SUCCEEDS BEYOND IT BEING JUST AN IDEA THAT WILL BE SABOTTAGED BY WHATEVER MEANS EVEN IF IT MEANS USING THE VERY SAME ACT THAT LEGALISES COOP BANK.

General functions 55. (1) The Agency must, in addition to its other functions provided for in this Act— (a) support, promote and develop co-operative banking, including, despite section 3(1), deposit-taking co-operatives; (b) appoint a supervisor in accordance with section 41(2) and support the supervisor in exercising and performing his or her powers and functions; (c) promote the establishment of representative bodies and support organisations; (d) register and regulate representative bodies; (e) accredit and regulate support organisations; {f) provide financial support to co-operative banks through loans or grants; (g) manage the Fund in accordance with section 26; (h) assist co-operative banks with liquidity management; (i) facilitate, promote and fund education, training and awareness in connection with, and research into, any matter affecting the effective, efficient and sustainable functioning of co-operative banks; (j) consult with the South African Qualifications Authority established by the South African Qualifications Authority Act, 1995 (Act No. 58 of 1995), or any body established by it and liaise with the relevant National Standards Body established in terms of Chapter 3 of the regulations under the South African Qualifications Authority Act, 1995, in respect of co-operative banks and support organisations;

1. SUBMISSION WITH REGARDS TO LIMITATIONS POSED BY :
   1. R30 MILLION CEILING
   2. 200 MINIMUM NUMBER OF MEMBERS

It is our humble request to PARLIAMENT TO SCRAP THESE LIMITATIONS AS THEY REALLY ARE NOT HELPING US BUT ARE AN UNNECESSARY BARRIER TO ENTRY NOT ONLY IN THE FINANCIAL SECTOR BUT IN ALL SECTORS OF BUSINESS E.G:

THE R30-Million Rands may have seem to have been a lot of money to someone back then in 2007 BUT TODAY IN 2017 (TEN YEARS LATER) DOES NOT HAVE THE SAME VALUE EVEN TO THAT PARTICULAR PERSON >>>IN ESSENCE TIME VALUE OF MONEY CHANGES DUE TO A LOT OF SOCIO-POLITICAL AND ECONOMIC REASONS YET THIS ACT OR THE CRAFTORS OF THIS ACT IT WOULD SEEM, DID NOT TAKE THAT INTO CONSIDERATION, HENCE 10 YEARS DOWN THE LINE WE ARE STILL EXPECTED TO COMPLY WITH THAT LIMITATION…R30 MILLION.

THIS DOES NOT END THERE…a MAXIMUM R30-MILLION OWNED BY A MINIMUM 200 PEOPLE: UNPACK THIS: THIS EFFECTIVELY WORKS OUT TO NO MORE THAN R300 000- (THREE HUNDRED THOUSAND PER PERSON) ….THREE HUNDRED THOUSAND , THAT IS THE MAXIMUM AMOUNT THAT THIS ACT IS RESTRICTING US TO AND NO MORE: THAT IS A LIMITATION…AND IT COMPLETELY CONTRADICTS THE PURPOSE OF THIS ACT AS WELL DEFEAT THE GOAL OF A DEVELOPMENTAL STATE, AND AS SUCH WITH THESE RESTRICTIONS IN PLACE WE SHALL NEVER LIVE TO SEE “RADICAL ECONOMIC TRANSFORMATION “BEING REALISED IN OUR SA ANY TIME SOON, NOT IF THIS ACT AS IT STANDS WITH THESELIMITING SECTIONS,SUBSECTIONS AND IMPLEMENTATION PROCEDURES AND STRATEGIES ARE ALLOWED TO EXIST.

The laws of our country MUST be there to ENABLE OR AS AN ENABLER TO PRODUCE, SUPPORT , ENCOURAGE AND ENHANCE DEVELOPMENT INITIATIVES AND PROGRAMMES OF PEOPLE/COMMUNITIES NOT STIFLE, FRUSTRATE, RESTRICT OR CAUSE TO FAIL SUCH DEVELOPMENT PROGRAMMES/INITIATIVES AS THE ACT IN ITS CURRENT FORM IS DOING TO US AS COMMUNITIES, ORGANISED BODIES AND ASSOCIATIONS WHO WANT TO DRIVE AND RID OUR NATION OUT OF THE BONDAGE OF POVERTY. WE ARE SAYING TO YOU GOVERNMENT , YOU HAVE THE POWER TO HELP US TAKE OUR PEOPLE FORWARD, DO IT FOR ALL OF US, SCRAP, CHANGE, RELOCATE, MOVE WHATEVER NEEDS TO BE DONE WITH THIS ACT DO IT NOW .