



**THE PRESIDENCY**

**REPUBLIC OF SOUTH AFRICA**

**DEPARTMENT OF PLANNING, MONITORING AND EVALUATION**

**SOCIO-ECONOMIC IMPACT ASSESSMENT SYSTEM (SEIAS)**

**FINAL IMPACT ASSESSMENT TEMPLATE (PHASE 2)**

## **Final impact assessment: Amendment of the National Road Traffic Act, 1996**

### **(Act No.93 of 1996) Amendment Bill, 2016**

The final impact assessment provides a more detailed assessment of the ultimately legislative proposal. In addition, it identifies (a) mechanisms for monitoring, evaluation and modification as required; and (b) a system for managing appeals that could emerge around the implementation process.

#### **Problem statement/Theory of change**

1. Summarise the proposal, identifying the problem to be addressed and the roots (causes) of the problem that will be addressed by the new rule.

Summary of the proposal (Summary Background of the proposed policy/ bill/regulations):

This Bill (National Road Traffic Amendment Bill) serves to amend the National Road Traffic Act, 1996 (Act No.93 of 1996)

The NRTA Bill intends to amend the National Road Traffic Act, 1996 (Act No.93 of 1996) by inserting certain new definitions and to amend others, to provide for the process of application and registration of manufacturers, importers and builders of motor vehicles, manufacturers of blank number plates, reflective sheeting for number plates, supplier of blank number plates, supplier of reflective sheeting for number plates or embossers of number plates. To provide for the regulation of driving schools industry by providing for the manner of application for the grading and registration of a driving school and provide for the prohibition of the use of alcohol on the public roads by motor vehicle drivers. The drive to inculcate good ethos in aspirant or novice motor vehicle drivers has necessitated the need to amend the NRTA as the principal Act on motor vehicle issues to have the driving schools appropriately graded and registered.

Please add a paragraph on challenges that led to the amendments-that is driving schools, alcohol, manufacturers and etc.

The intention is to amongst others prohibit the operation of a driving school in South Africa unless such driving school has been graded and registered. To provide for the Road Incident Management System in South Africa. To prohibit the manufacturing, building, modification, importation, selling or distribution of motor vehicles unless registered in accordance with the Act, to provide for the process registration of weighbridge facilities and to prohibit the operation of such weighbridge facility unless such is registered, to do away with any alcohol content in the blood or breath specimen of motor

vehicle drivers on the South African public roads. The use of alcohol on our South African roads robs South African economy as a result of untimely death of road users on our roads caused by alcohol abuse by drivers who are aware of their responsibilities towards contributing to road safety. With the large vehicle population registered and licensed in the country coupled with vehicles licensed in foreign territories the South African law enforcement agencies are over stretched resulting in serious violations being undetected. The rate of road fatalities in the country calls for various interventions to stem the tide on this phenomenon. Unregulated driving schools' industry leads to inadequately trained vehicle drivers which in turn results in high accident rates with both serious and superficial injuries, in certain instances resulting in fatalities and further putting a strain on the Road Accident Fund with large amounts of compensation for damages suffered occasioned by the injuries, the RAF's expenditure on Road Accidents totalled R146b in 2017.

Problem	Root Causes
<p>High number of motor vehicle road accidents, according to the RTMC roads accident fatalities statistics report for the 2017 Easter period overall number of crashes during Easter weekend equates to 186 with the resultant 260 roads fatalities recorded. This equates to a 6.12% increase as compared to the same period in 2016 which recorded 245 fatalities,</p>	<p>Negative driver behaviour and non-adherence to road traffic rules</p>
<p>High number of road crashes resulting in fatal and critical injuries.</p>	<ul style="list-style-type: none"> <li>● Fraudulent and sub-standard driving licenses being issued in the Country's Driving licences testing centres</li> <li>● Uncontrolled and unregulated driving schools</li> <li>● Employment of unregistered driving schools' instructors</li> </ul>
<p>Vehicle theft and cloning</p>	<ul style="list-style-type: none"> <li>● Incompliant number plates</li> <li>● Lack of streamlined number plate legislation in terms of which only registered persons can manufacture number plates</li> </ul>
<ul style="list-style-type: none"> <li>● Secondary accidents occurring in accident scenes</li> <li>● Traffic delays and road rage incidents during secondary accidents</li> </ul>	<ul style="list-style-type: none"> <li>● Lack of streamlined Incident Response systems in the country</li> <li>● Prolonged closure of lanes and lack of emergency services rapid response to bring the situation under control and to clear an incident scene as quickly and efficiently as possible to prevent occurrences of further accidents</li> </ul>

2. Describe the intended outcomes of the proposal.

The proposal is intended to reduce the motor vehicle road accidents, fatalities, injuries, vehicle theft and cloning as well as speedy clearing of incident scenes through:

- Improving standards in motor vehicle drivers' licenses;
- Ensuring that there is inculcation of good ethos in our novice motor vehicle drivers;
- Improving road safety on our public roads and eliminating the cloning of motor vehicles; and
- Improved and streamlined Incident Response Systems to scenes of accidents.

3. Describe the groups that will benefit from the proposal, and the groups that will face a cost. These groups could be described by their role in the economy or in society. As a minimum, consider if there will be specific benefits or costs for the poorest households (earning R7000 a month or less); for black people, youth or women; for small and emerging enterprise; and/or for rural development. Add more lines if necessary.

<b>Groups that will benefit</b>	<b>How will they benefit</b>
Road users(i.e. pedestrians, motor vehicle drivers and passengers)	Reduction of vehicle accidents, fatalities, safer roads and mobility
Vehicle owners and operators	Reduction in vehicle theft and vehicle cloning premised from streamlined number plate manufacturing and microdotting of motor vehicles
<ul style="list-style-type: none"> <li>• Registering authorities</li> <li>• Law enforcement agencies</li> <li>• Road Accident Fund</li> <li>• Insurance Companies</li> </ul>	<ul style="list-style-type: none"> <li>• Seamless registration and licensing of motor vehicles</li> <li>• Easy enforcement of legislation pertaining to prohibition of alcohol in SA as a result on the abolishment of blood and breadth alcohol content in the blood or breadth specimen of drivers</li> <li>• Reduced payment of compensation claims premised from damages resultant from injuries sustained in the accidents, alleviation of the spending thrift of the RAF resultant from exorbitant claims lodged for compensation as a result of serious accidents</li> <li>• Reduced payment of insurance claims for material damages to motor vehicles</li> </ul>
Emergency services i.e. Emergency Medical Services, Disaster Management Services, traffic law enforcement, Department of Health (Forensic Pathology Services)	<ul style="list-style-type: none"> <li>• Reduced responses for serious accidents including fatal accidents</li> <li>• Psychological wellness as a result of reduced response to fatal accident scenes</li> </ul>

<b>Groups that will bear the cost or lose</b>	<b>How will they bear the cost or lose?</b>
<ul style="list-style-type: none"> <li>• Number plate manufacturers (manufacturer or supplier of blank number plates or</li> </ul>	<ul style="list-style-type: none"> <li>• They will need to apply for registration as number plate manufacturers before being registered as such and manufacturing number plates, weighbridge facility, manufacturer, supplier of microdots or microdot fitment centre</li> </ul>

Groups that will bear the cost or lose	How will they bear the cost or lose?
reflective sheeting for number plates, embossers of number plates), weighbridge facility, manufacturer, supplier of microdots or microdot fitment centre <ul style="list-style-type: none"> <li>• Driving schools</li> </ul>	<ul style="list-style-type: none"> <li>• Need for application for registration of driving schools before operating a driving school</li> </ul>
<ul style="list-style-type: none"> <li>• Law enforcement Agencies</li> </ul>	<ul style="list-style-type: none"> <li>• They will need to make sure enforcement happens by enhancing their law enforcement resources i.e. both human and capital</li> </ul>

- Describe the behaviour that must be changed, and the main mechanisms to achieve the necessary changes. These mechanisms may include modifications in decision-making systems; changes in procedures; educational work; sanctions; and/or incentives.
- Identify the groups inside and outside of government whose behaviour will have to change to implement the proposal (add more lines if required).

**This table below covers Number 4 and 5**

Groups inside government whose behaviour will have to change	Behaviour that must be changed	Main mechanisms to achieve the necessary changes.
Traffic officers	Lack of approach to alcohol content legislation enforcement	Intensified law enforcement of blood and breadth alcohol content ban on motor vehicle drivers and ensure expedited blood alcohol content testing processes
Emergency Services	No collaborated, seamless and efficient road incident management	Strict adherence to the RIMS requirements, to be achieved by making sure that responding services are briefed and appropriately trained
Number plate manufacturers	incompliant number plates manufacturing	Manufacture number plates in accordance and compliance with the NRTA
Driving schools inspectorates	Driving schools not teaching aspirant drivers in accordance with the National Road Traffic Act	Inspect driving schools to check for compliance with the driving schools legislation
Traffic Departments	Issuing of drivers' licences to non-qualifying learner drivers	Implement mechanisms to curb fraud and corruption at Driving licences Testing Centres
Issuing authorities i.e. law enforcement Authorities	Lack of enforcement of the alcohol legislation	Strict enforcement of the Alcohol content legislation through roadblocks and law enforcement joint operations to root out the problems of drunk driving

Groups outside government whose behaviour will have to change	behaviour that must be changed	Main mechanisms to achieve the necessary changes.
Motor vehicle drivers	<ul style="list-style-type: none"> <li>The wrongful behaviour of South African drivers of driving motor vehicles whilst drunk needs to change, in fact it needs to stop it needs be.</li> <li>Compliance with the number plates requirements because currently vehicle drivers and operators are not complying with number plate legislation, e.g. the practice of using wrong font and combinations on the number plates as a result of lack of stricter enforcement of the legislative provisions on number plates.</li> </ul>	<ul style="list-style-type: none"> <li>Refrain from the use of alcohol and driving on the public roads by <b>strictly</b> enforcing the legislation and ensure that blood tests are processed timeously to avoid the withdrawal of court cases from the court roll.</li> <li>Conducting campaigns, information sessions, road shows, media (audio and visual) publications for public awareness</li> <li>Purchase number plates only from registered number plate manufacturers to ensure that their vehicles are safe from cloning</li> </ul>
Driving schools	<ul style="list-style-type: none"> <li>There is currently no legislation on driving schools, people operate driving schools without appropriate instructors certificates, driving schools will need to comply with the legislation on driving schools</li> </ul>	<ul style="list-style-type: none"> <li>Register their driving schools before operating them</li> </ul>

6. Report on consultations on the proposal with the affected government agencies, business and other groupings. What do they see as the main benefits, costs and risks? Do they support or oppose the proposal? What amendments do they propose, and have these amendments been incorporated in your proposal?

The proposed amendments were discussed at the National Department meetings with the provinces and first published for public comments and members of the public were granted an opportunity to give comments or objections to the proposed draft Bill.

Affected stakeholders	What do they see as main <u>benefits, costs and risks</u>	Do they <u>support or oppose</u> the proposal	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
1. Western Cape Provincial Department of Transport	<ul style="list-style-type: none"> <li>Proposed definition of body builder differs from the one in the regulations</li> <li>There is no scientific evidence to show that if the existing acceptable</li> </ul>	<ul style="list-style-type: none"> <li>Yes, but they suggest adoption of one definition for consistency</li> </ul>	<p>None, except adoption of one definition for consistency purposes</p> <p>None proposed</p>	<ul style="list-style-type: none"> <li>Not yet, they will be done in the regulations</li> <li>No</li> </ul>

Affected stakeholders	What do they see as main <u>benefits, costs and risks</u>	Do they <u>support or oppose</u> the proposal	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
Kwa-Zulu Natal Provincial Department of Transport	<p>levels of alcohol consumption are further reduced, that road safety will improve coupled with a decline in the number of road crashes, practicality of policing and prosecuting the proposed zero alcohol levels may also be jeopardized by the fact certain foods and medicine contain alcohol and the fact that trace amounts of alcohol may still be in the blood stream the morning after a night out drinking, request for a formal regulatory impact assessment before legislating.</p> <ul style="list-style-type: none"> <li>As the National Department of Transport will appoint microdot manufacturers, who are in turn responsible for the fitment centres, it is suggested that the regulations be amended to refer to "Department" and not the "MEC" as the provinces will not be involved in the appointment of the microdot manufacturers.</li> <li>Should the "0" level alcohol</li> </ul>	<ul style="list-style-type: none"> <li>They support the proposal subject to a formal regulatory impact assessment</li> </ul> <p>Yes, provided we amend the proposal to have the power of registration of microdot manufacturers vest in the National Department of Transport</p>	<p>That the word amendment should rather refer to the Department rather than the MEC</p>	<p>Yes, section 5J</p>

Affected stakeholders	What do they see as main <u>benefits, costs and risks</u>	Do they <u>support or oppose</u> the proposal	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	<p>limit be introduced one will find that the majority of alcohol related offences will be of a minor nature. The law enforcement resources will be burdened with the huge influx of drunken driving cases which fall into the lower categories of alcohol/breath levels. Drivers who are actually intoxicated will have a greater chance of going undetected as traffic officers will be busy with frivolous cases</p>	<ul style="list-style-type: none"> <li>No, they do not support the proposal</li> </ul>	<ul style="list-style-type: none"> <li>None proposed</li> </ul>	N/A
2. Southern African Catholic Bishops Conference	<ul style="list-style-type: none"> <li>The ban on alcohol will criminalise ordinary people who for instance take over the counter medicines, food, supplement with varying levels of alcohol in them, current legislation should be enforced instead of shifting the responsibility from a lack of serious</li> </ul>	<ul style="list-style-type: none"> <li>Not supported</li> </ul>	None proposed	<ul style="list-style-type: none"> <li>N/A</li> </ul>

Affected stakeholders	What do they see as main <u>benefits, costs and risks</u>	Do they <u>support or oppose</u> the proposal	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	<p>enforcement to the criminalisation of ordinary people</p> <ul style="list-style-type: none"> <li>• South Africa has an extremely inadequate public transport network and although various government administrations have spent a lot of effort, time and financial resources in improving not just infrastructure but access, the country is not in any position to claim that the population can travel without dependence on private cars</li> </ul>			
<p>3. National Association of Automobile Manufacturers of South Africa (NAAMSA)</p>	<ul style="list-style-type: none"> <li>• Process of developing <i>regulations</i> under the NRTA are not suitable for the introduction of the vehicle design requirements of the ECE and ISO affecting new models of vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>• They oppose the proposal</li> </ul>	<p>They propose the deletion of the proposal to make ECE Regulations and ISO Standards mandatory under the Road Traffic Act since well-tried and proven provisions already exist under the Department of Trade and Industries</p>	<ul style="list-style-type: none"> <li>• Not incorporated because ECE Regulations are currently referred to in the NRTA, for example regulation 192A but there is no informing provision in the Act currently incorporation of ECE Regulations, this is done ultra vires as a result, the proposed section is aimed at empowering the Minister for incorporation of ECE Regulations</li> </ul>

Affected stakeholders	What do they see as main <u>benefits, costs and risks</u>	Do they <u>support or oppose</u> the proposal	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated in your proposal</u>
4. The public (Albert Broeksma)	<ul style="list-style-type: none"> <li>Prosecution of really serious alcohol related cases would be diluted or even lost in a proliferation of criminalising non-dangerous people who may have had a sip of cough syrup</li> </ul>	<ul style="list-style-type: none"> <li>Not Supporting the proposal</li> </ul>	None	<ul style="list-style-type: none"> <li>N/A</li> </ul>
5. The public (Dale Hillebrand)	<ul style="list-style-type: none"> <li>It is not only drivers of motor vehicles that are a hazard when alcohol has been consumed</li> </ul>	<ul style="list-style-type: none"> <li>Supported</li> </ul>	It is proposed that section 65 be amended to include all drivers of any vehicles and all pedestrians in the road reverse	<ul style="list-style-type: none"> <li>No, the NRTA and more specifically section 65 provides for the prohibition for all motor vehicle drivers.</li> </ul>

7. Describe possible disputes arising out of the proposal, and the system for settling and appealing them. How onerous will it likely be for members of the public to lodge a complaint and how burdensome and expeditious is the proposed dispute-settlement procedure?

Possible challenge to the scientific values derived from the Breath alcohol measuring devices, however the criminal justice system in South Africa allows for appeals and review procedures in case of any convictions that are seen as having made erroneously by the trial court either because of the wrong process followed or cardinal evidence being overlooked. Besides the appeal process in terms of the Criminal Procedure Act, 1977 (Act No.51 of 1977), the National Road Traffic Act makes provisions for the actual appeals procedures premised from any refusal on anything provided for in the Act.

Possible Disputes	Dispute Settlement Mechanism
<ul style="list-style-type: none"> <li>Opposition to the abolition of the alcohol content in breath and blood specimen of vehicle drivers on SA roads</li> </ul>	<ul style="list-style-type: none"> <li>South African jurisprudence allows for court reviews in case of disputes for parties who feel dissatisfied with certain decisions to vindicate their rights</li> </ul>

## Impact assessment

8. Describe the costs and benefits of implementing the proposal to the groups identified in point 6 above, using the following chart. Add more lines if required.

Group	Implementation costs	Cost of changing behaviour	Costs/benefits from achieving desired outcome	Comments
Traffic Officers		Attendance of refresher courses in order to get acquainted with the new requirements in terms of the legislative amendment (i.e. Alcohol ban), enforcement of number plates legislation on the roads to ensure compliance of number plates to the standards	Reduction of road carnages on the public	None

<b>Group</b>	<b>Implementation costs</b>	<b>Cost of changing behaviour</b>	<b>Costs/benefits from achieving desired outcome</b>	<b>Comments</b>
NRCS (National Regulator for Compulsory Specifications)	Possible Expansion of the inspectorate function and personnel to factor in inspection functions	None	Compliance with the new proposed number plate legislation by the manufacturers	None
Nmisa(National Metrology Institute of South Africa)	Re-calibration of alcohol measuring devices to the level of 0% BAC content in the Breath and Blood specimen	Unknown	Avoidance of wrongful arrests and prosecutions premised from the wrong measurements obtained	None
Driving schools operators		Unknown, fees will be discussed with the provinces and driving schools industry Application for the registration and operation of driving schools in SA	More compliant driving schools with the legislation, elimination of fraudulent and criminality inclined driving schools	None
RTIA (Road Traffic Infringement Agency)		Change or amendment of offences and infringements to reflect total ban on alcohol in the breath specimen of vehicle	More compliant driving schools with legislation and reduced road carnages	None

Group	Implementation costs	Cost of changing behaviour	Costs/benefits from achieving desired outcome	Comments
		drivers on the roads		
Department of Transport/Provincial Department of Transport and local authorities	<ul style="list-style-type: none"> <li>The costs for purchasing the breathalyser equipment for testing of alcohol</li> </ul>	<p>Costs for public awareness campaigns to inform and educate the public about the new legislative around driving schools and the alcohol banning legislation and the legitimate manufacturers of number plates.</p> <p>Compliance by the members of the public will reduce the number of breathalysing equipment to be used.</p>	<ul style="list-style-type: none"> <li>The public will be knowledgeable about the new legislation requirements and know what is required of them as the members of the public</li> <li>There would not be more drunk driving cases on the roads and the fatalities will be reduced</li> </ul>	None

1. Describe the changes required in budgets and staffing in government in order to implement the proposal. Identify where additional resources would be required for implementation. It is assumed that existing staff are fully employed and cannot simply absorb extra work without relinquishing other tasks.

Possibly purchase of new breath alcohol testing equipment and calibration changes to detect alcohol to the level of zero in specimens

2. Describe how the proposal minimises implementation and compliance costs.

Due to the reduction of vehicle accidents projected to occur as a result of the total banning of alcohol usage of the drivers, the road carnages will also reduce and thus the SA economy will be alleviated. The amendments impose compliance costs because they require driving schools' operators to register their driving schools and make sure that they operate properly registered driving schools which see the elimination of fraudulent driving schools. The legislation also make provision for the appointment of the inspectorate of driving schools who will ensure compliance with these requirements, non-compliance will therefore amount to de-registration.

The proposal does not cover this as it is a legislative intervention aimed at ensuring road safety and the reduction of road deaths, registration process is clearly outlined in the regulations and this will be done by the MEC's of the nine respective provinces.

3. Describe the main risks to the achievement of the desired ends of the legislation and/or to national aims that could arise from adoption of the proposal. Add more lines if required.

- a. Non-compliance by vehicle operators
- b. Inadequate law enforcement
- c. Increased cases on the court roll and possible clock up of the court roll

## Managing risk

Describe the measures taken to manage the identified risks. Add more rows if necessary.

Identified risk	Mitigation measures
a. Non-compliance by vehicle operators	<ul style="list-style-type: none"> <li>• Formal communication to the provincial departments responsible for transport upon implementation</li> <li>• Media statement ahead of implementation of the proposals</li> <li>• Employment of more traffic officers, training of traffic officers to educate them about the amendments, re-calibration of alcohol testing equipment to test alcohol at the level of 0% alcohol content</li> </ul>
b. Inadequate law enforcement	<ul style="list-style-type: none"> <li>• Formal communication to the provincial departments responsible for transport upon implementation</li> <li>• Media statement ahead of implementation of the proposals</li> </ul>

Identified risk	Mitigation measures
	<ul style="list-style-type: none"> <li>• Employment of more traffic officers, re-calibration of alcohol testing equipment to test alcohol at the level of 0% alcohol content</li> </ul>
c. Possible Increased cases on the court roll and possible clock up of the court roll	<ul style="list-style-type: none"> <li>• Engagement with the NPA to ensure that cases are not delayed.</li> <li>• Obtain scientific evidence timeously to ensure expedited court judgments</li> <li>• Request the Department of Health to increase laboratories to ensure speedy resolution of cases</li> </ul>

4. Describe the mechanisms included in the proposal for monitoring implementation, evaluating the outcomes, and modifying the implementation process if required. Estimate the minimum amount of time it would take from the start of the implementation process to identify a major problem and remedy it.

The eNaTIS system will cater for accident register which will indicate what is the cause of each and every accident that occurs on the roads which will assist us to do a review where it is necessary to do a review of the legislation. The bill was thoroughly discussed and approved at the Inter-provincial Policies and Procedures Committee meeting (IPPP) and the Traffic Legislation Technical Committee (TLTC) which both comprises of all the nine provincial departments of transport, also comprises of the South African Bureau of Standards (SABS) and the National Regulator for Compulsory Specifications (NRCS), the implementation of the Bill by transport stakeholders will be ensured by media statements that get issued every time the Department of Transport proclaims an Act of Parliament or a regulation amendment.

## Summary

1. Summarise the impact of the proposal on the main national priorities.

Priority	Impact
Social cohesion	None
Security	<p>Reduction of carnages and contribution to road safety</p> <p>Families lose breadwinners to road crashes resulting in loss of income to ensure both their financial and food security. Social Welfare and Safety security has extra pressure exerted due to the collateral damage (i.e. injury and trauma associated with road crashes) that appears to accompany the</p>

Priority	Impact
	mobility and access benefits for which transport is intended. Reduction in road accidents will reduce the above negative social impacts
Economic growth and investment	Safety of the economically active age group, particularly between ages (25 – 45) who constitute the majority of road fatalities on the road network which result in loss of skills and productivity in the country. Furthermore, 3.4% of GDP is lost to road crashes.
Economic inclusion (employment creation and equity)	Job opportunities in driving schools and instructors, unfair competition due to fraudulent driving schools will be minimised
Environmental sustainability	None

2. Identify the social and economic groups that would benefit most and that would bear the most cost. Add more rows if required.

Main beneficiaries	Main cost bearers
Drivers of vehicles	Driving school owners
Road users and learners	<ul style="list-style-type: none"> <li>• Provincial Departments responsible for Transport and Agencies</li> <li>• Number plate manufacturers</li> <li>• Microdot manufacturers</li> </ul>
Government: Reduction fatalities and road accident claims	

3. In conclusion, summarise what should be done to reduce the costs, maximise the benefits, and mitigate the risks associated with the legislation. Note supplementary measures (such as educational campaigns or provision of financing) as well as amendments to the draft itself, if appropriate. Add more lines if required.

Conduct educational campaigns to alert the drivers of vehicles that there is a new legislation amendment that requires them to not use alcohol on the roads. Also encourage driving schools to

display their certificates of registration as driving schools in their businesses to ensure that aspirant drivers know which driving schools are registered and fit to teach them to drive and obtain motor vehicle driving licences.

Where the driving school is not appropriately registered, the inspectorate of driving schools will then be able to monitor that and issues appropriate notices for the closure of the driving schools. Once the driving school is registered with the provinces (MEC's) the Data will be kept with the provincial departments and thus the public will be able to check and verify the registration of driving schools with that particular province for authenticity before registering with that particular driving school.

Encourage microdot manufacturers to also display their certificate so that users go to approved fitment centres to avoid their vehicles being impounded if they are found to have fitted microdots that are not compliant with the legislation. Number plate manufacturers also to display their certificates so that the public can fit appropriately complying number plates on their motor vehicles, they need to also be encouraged to manufacture number plates in compliance to the standard for number plate manufacturing.

4. Please identify areas where additional research would improve understanding of the costs, benefits and/or risks of the legislation.

a. N/A

5. For the purpose of building a SEIAS body of knowledge please complete the following:

<b>Name of the Official:</b>	Sello Mokubane
<b>Designation:</b>	Senior Legal Admin Officer
<b>Unit:</b>	Legal Service(Legislation)
<b>Contact Details:</b>	012 309 3540 or 0729223390
<b>Email address:</b>	mokubyas@dot.gov.za