

16 September 2026

Mr J. Motsatsing
Director of Road Transport Regulations and Standards
National Department of Transport
159 Struben Street
Pretoria Central
PRETORIA
0002

Dear Mr Motsatsing

COMMENTS ON THE DRAFT NATIONAL ROAD TRAFFIC AMENDMENT REGULATIONS

Before considering the particulars of the proposed amendments to specific sections of the regulations, the current state of driver's licence card issuance in South Africa must be considered. Throughout the past decade, there have been frequent backlogs in the issuance of new and renewed driver's licence cards, primarily caused by regular breakdowns of the department's licence card printing machine. While a tender process was initiated to replace it, this process has come to a halt after suspected irregularities in other contracts with the preferred bidder were flagged. This, in turn, led to the minister ordering an investigation into the matter, which needs to be completed before the process of appointing a new supplier can continue. From the above it is clear that the department is unprepared for any unforeseen circumstances, and another breakdown of the licence card printing machine could immediately lead to a new backlog.

In this context, AfriForum urges the department to commit to the swift implementation of a ten-year validity period for driver's licence cards in South Africa. As of today, it remains the only solution to card issuance backlogs that could realistically be implemented within a short space of time. Furthermore, as much as AfriForum appreciates the opportunity given to the public to provide formal written comments, the overwhelming support for this extension has been evident for some time. It would thus be unwise to become entangled in debates about the formulation of specific regulation clauses at this stage, while the public is eager to see the principle put into practice as soon as possible.

Specific input

- AfriForum concurs with the proposed amendment of regulation 100 of the Regulations. It provides important clarity to a provision that has previously caused legal uncertainty.
- AfriForum is in full support of the extension of the validity period of learner's licences to 24 months, as provided for by the proposed amendment of regulation 101(1).

Address: 58 Union Avenue, Kloofsig, Centurion • **Tel.:** 086 10 200 30

Member Affairs - Email: ledesake@afriforum.co.za • **Directors:** Ms A. Bailey, Mr P.J.W. Buys, Dr H.K. Coetzee, Mr P.L. Dekker, Mr F.J.D. de Klerk, Mr G.R. de Vries, Dr D.J. Hermann, Mr C.M. Kriel and Dr R. Pretorius. • **Company Secretary:** Mr W.A. Vogel.

Registration number: 2005/042861/08 • **NGO number:** 054 - 590

- The amendment of regulation 108 lies at the heart of the contentious topic of the validity period of the different driver's licence codes. AfriForum has already stated our support for an extended validity period in principle. Unlike the proposed regulation amendment, AfriForum would prefer for the extension to apply to all licence codes. The current proposal disincentivises prospective licenced drivers to gain the skill of being able to drive a heavy vehicle. AfriForum contends that it will be to the detriment of South Africa's economy if less citizens opt to prepare for and acquire driver's licences for heavy vehicles. Furthermore, the current requirements regarding Professional Driving Permits already ensure that, for example, bus drivers have their eyesight tested regularly. There is thus no need for such driver's licence cards to expire within five years. AfriForum urges the department to change the wording of this proposed regulation amendment to include all licence codes in the validity period extension. However, if no consensus can be reached on this issue among stakeholders, AfriForum considers it better to implement the current proposal than to delay the implementation of any validity period extension.
- AfriForum concurs with the addition of subregulation (7) to regulation 108 in its current wording.

Kindly review the above proposals and make adjustments to the draft regulation amendments as seen fit.

Kind regards

Louis Boshoff
Campaigns Officer
AfriForum
Cell: 072 804 9779
Email: louis.boshoff@afirforum.co.za