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NPC: 2016 / 276565 / 08



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16 September 2019

The Chairperson  
Ports Regulator of South Africa  
Private Bag X54322  
Durban  
4000

Dear Sir,

## **Re: National Ports Authority Tariff Application 2020/21**

The Eastern Cape Maritime Business Chamber (ECMBC) on behalf of the emerging small businesses hereby submits its proposal in line with the methodology presented for the **National Ports Authority Tariff Application 2020/21**.

ECMBC would like to thank the Ports Regulator for the opportunity to submit our input which is more directed on how the small businesses community can also be accommodated in the consideration of the National Ports Authority Tariff Application for the period 2020/2021.

ECMBC believes that in order for the National Port Authority to fully realise its function of being a change agent (as one of its functions) it needs to apply a lenient approach towards the small and emerging businesses (particularly black) who are either already operating or are entering the industry.

While we understand and support the premise approach of tariff methodology, we seek to register that the proposed percentage increase in areas that affect small businesses must be addressed in a manner that classifies such businesses as Targeted Enterprise {TE} (Small, Medium and Micro-Enterprises “**SMME**” with 51% black ownership including ownership by women and youth specifically black according to South African description).

The Targeted Enterprises (TE) must be engaged differently in a developmental manner than the already established businesses (including international businesses) that are financially able to comply with the ports tariffs once the application process is concluded.

This proposal approach for this application wishes to also extend to current tariffs and application processes for take-on and on-boarding by the National Port Authority.

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**EASTERN CAPE MARITIME BUSINESS CHAMBER (ECMBC)**

**Executive:** Unathi Sonti; Xhantlomzi Lamani; Ayanda Yani; Nondumiso Mfenyana;  
Nonceba Kwaza; Lungisa January; Buyile Soya

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This submission is made for both the basic groups of Authority's services as our constituency engages or wishes to engage in both port infrastructure and operational services for port users.

We clearly understand functions of revenue streams of the National Port Authority and believe upon proper engages to outline a clear implementation methodology for the consideration of the Targeted Enterprises in this Tariff Application will create a more conducive environment for SMME's as it is our vision to be a developing, inclusive, progressive and transformative chamber for maritime enterprises with a focus on competent emerging businesses.

We therefore request a serious look into our businesses in the application processes and we wish that between us and all parties involved in business at our National Ports a joint seating can be arranged to that an amicable approach can be designed and implemented.

This is our first comment in the processes and we hope prior the conclusion of the final methodology our chamber would have engaged with both the Ports Regulator and Port Authority including SAMSA.

Yours Sincerely,

**Unathi Sonti**  
**Chairperson**  
**Eastern Cape Maritime Business Chamber (ECMBC)**

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