

Section	Objective	Amendment proposed	Justification
A. Agriculture, hunting, forestry and fishing:			
A-1	Agriculture and Agricultural exports must include wine and hops	"... including the export of agricultural products, wine and hops permitted"	<ul style="list-style-type: none"> - In terms of the contribution to GDP, agriculture and agri processing make up around 11%, whilst the contribution to employment is much higher at 13%. In terms of the latter contribution, it is important to remember that the sector plays a critical role in employing mostly unskilled workers, particularly from rural areas. - Agricultural value chains also play a significant role in generating income from exporting high-value products. Agricultural exports make up 54% of all exports from the Western Cape. The GVA created by Agriculture is equivalent to R23 billion. The sector employs 180 674 people and generates R37 billion of export revenues out of the R129 billion that is exported from the Western Cape. - The South African wine industry GDP contribution to the SA economy (most of it being based in the Western Cape) is more than R49 billion per annum and it creates 290,000 job opportunities directly and indirectly. These figures include a R7.5 billion excise and VAT contribution from wine related products to SARS in 2019. - Wine is South Africa's second biggest agricultural export and earns more than R9 billion foreign revenue annually. The industry exports approximately 50% of its production whilst the remainder is sold in the local economy. Furthermore this industry is not only the biggest supplier of Fairtrade certified wine in the world, but has also made significant progress with ethical compliance via WIETA (http://wieta.org.za), transformation at farm level, development of talent and the support and development of Black Owned Enterprises. The industry is also globally recognised for its environment, sustainability and wine of origin scheme that is considered world class. - Wine is, in the global official nomenclature, classified as an agricultural food product. This is confirmed by our main competitor nations in export markets, such as Argentina, Chile, Australia, USA and New Zealand, who all classify wine as an agricultural food product and their governments are allowing exports to continue during the current crisis. Even countries such as Italy, which to date has the highest infections and deaths of COVID-19 has allowed the wine industry to export as it is considered an essential service. South Africa is the only wine producing country experiencing such a ban on exports during the Covid-19 crisis.
A-1	Specify that agri-processing is included	"All agriculture and agri-processed..."	In 2018 the agri processing industry contributed R40 billion to the local economy and employed 80 917 people. It further contributed R33 billion in export revenues. These sector activities include the manufacturing of food, beverages and many natural products. The production activity in most factories needs to be sterile as per many regulated CHSA compliance requirements. To limit the production capacity of the factories would hamper the value chain. With the current regulation, only allowing for 20% of their employees per shift at their premises/factory, will not allow for productive start-up from the shutdown. It is proposed that the industry allow for at least 50% of the current work force on the premises to allow productive manufacturing. This would be in line with strict hygiene regulations as stipulated by the National Department of Health. This would also allow industry to meet their customer demands and assist with export order fulfillment.
A-1	To include horticulture and floriculture growing, exports and domestic sales	All agriculture (including horticulture and floriculture, export agriculture including wood and wine), hunting, forestry, fishing and related services, including the export and all aspects of domestic sale of all agricultural products permitted.	<ul style="list-style-type: none"> - The horticulture industry is worth approximately R 4 billion annually and employs 30 000 – 35 000 people. This covers both horticulture and floriculture components. - Opening the industry will have very little supply chain impact as most of the suppliers to the industry are already classified as essential services and as such have stayed open during lockdown. These include agrochemicals and fertilizers and the transport thereof. The bulk of the supply chain for the industry is the same as that of essential agriculture. - With plants having specific flowering times and limited shelf lives in containers, growers' stock will have to be dumped if not sold soon. - Most Garden Center properties are outdoors and are therefore better suited to social distancing than most supermarkets. If growers are not able to operate, the retail side of the supply chain will also collapse, leading to further job losses. - The horticulture industry is in dire straits, facing wholesale bankruptcy and closure. Cash flow has become a huge problem. Many of the major suppliers, being sole proprietors, fall outside the turnover bracket to receive financial help and are now facing closure with resultant retrenchments. The industry in the Cape was only just starting to recover from the water crisis when the COVID19 crisis hit. - The industry has already drafted and circulated guidelines to provide and maintain a safe, healthy work environment for employees and customers. These align with the occupational Health and Safety Act, The World Health Organisation and the National Department of Health. The South African Nursery Association is ready to play its part and will ensure that the industry's code of conduct is adapted to encompass the precautions covered in the above guidelines and that their members adhere to them. - Gardening is proven to have physical and mental health benefits which are much needed to keep the nations' minds positive during these difficult times. Added to this is the obvious benefits of households growing their own nutritious fruit, vegetables and herbs. - The purchasing of plants to beautify homes and gardens can also help to mentally uplift people and to keep them emotionally happy, locked down in their homes and gardens.
C. Manufacturing			
Additional Proposal	Night shifts under curfew	Allow industries such as boat builders and the broader agri-processing and manufacturing sector to work night shifts under curfew	The manufacturing sector is critical to the sustainability of the economy and manufacturing businesses have key roles in supplying components into essential industries. It is therefore critical that the manufacturing sector be allowed to maintain full output for their products to supply their customers. If the industry is allowed to run in 24-hour shifts, they will be able to better provide for their customers while still running operations with reduced staff numbers. If this is approved many industries such as the boat building and marine industries can meet their exports targets and provide to their customers. Companies in the Western Cape such as Robertson and Caine, Nautic and Southern Wind require to have 24hr production to meet international orders to be exported.
C-6	Group "Maritime" with "Automotive manufacturing"	Include the Boat building and Marine manufacturing industry to also scale up production in phases up to 50% (as with the Automotive manufacturing (including components) industry, during level 4 as the industry falls within the same SIC classification.	The industry has R2.7bn confirmed outstanding export orders *FOREX for SA, employs 4000 directly and 7000 indirectly through the established supply chains. Companies would need to incur substantial penalties on build times not adhered to and also to note that the local supply chain has very niche and small suppliers (a significant number are micro enterprises). The SA industry has France as their main competitor and they have gone back to production. SA industry is currently at number 2 in terms of global catamaran production and number 1 in power catamaran production. The sector has adopted a risk mitigation health and safety protocol. All members have been advised to undertake a risk assessment of their own workplaces and to draw up company specific guidelines that reiterate/align with government guidelines and further address specific mitigations needed relevant to work processes
Additional Proposal	Renewable Energy Value Chain, maintenance and operations	Renewable Energy component manufacturing and related value chains should be allowed to operate under strict "social distancing" criteria. Manufacturing concerns, allow for control and easy monitoring of social distancing.	Renewable Energy installations require efficient operation and maintenance in order to continue optimal generation capacity. Components required to operate and maintain RE installations are both manufactured locally and imported from abroad. Both activities should be allowed to persist during level 4 restrictions. The renewable energy industry alone contributes around R250bn to the local economy and is a significant job creator. This industry can ill afford to experience yet another bottle neck, especially considering that it has the ability to fast track rapid economic recovery. Globally, it is estimated that GDP gains in excess of \$98 trillion (above business as usual) could be expected by 2050. South Africa needs to be able to contribute and benefit to this gain. By accelerating this sector and making a just energy transition an integral part of the wider recovery strategy, we could achieve multiple economic objectives while contributing to South Africa's overall resilience.
Additional Proposal	Allow beverage bottling	Allow opening of bottling and related services for the wine and alcoholic beverage industry linked to agriculture.	A significant job creator in the downstream value chain of the wine and beverages industry (the wine industry alone employs approximately 300,000 people in the Western Cape) is value-adding activities such as bottling, labelling and packaging. In the absence of local capacity for bottling and related services there is significant risk in these activities being taken up abroad. To prevent the move to offshore manufacturing activities related to SA alcoholic wine and beverages we need to help protect the local value-adding capacity by allowing reopening of these services (at least for the export market initially). Approximately 40% of exported wine is currently packaged in South Africa, the rest is exported as bulk wine.
C-9	Employment to 50% per shifts	To allow industries such as boat builders and the manufacturing sector to maintain at least 50% of their workforce per shift.	With the current regulation, only allowing for 20% of their employees per shift at their premises/factory, will not allow for productive start-up from the shutdown. It is proposed that the industry allow for at least 50% of the current work force on the premises to allow productive manufacturing. This would be in line with strict hygiene regulations as stipulated by the National Department of Health. This would also allow industry to meet their customer demands and assist with export order fulfillment.
D. Construction and related services (Inc. Tradespeople)			
D-1		Immediate resumption of work on sites with minimal labour and more use of capital equipment (e.g. large site clearings and installation of underground services). Allow building sites to apply to local municipality to resume large building work subject to strict safety conditions, e.g. appointment of independent health and safety officers for approved sites; daily screening of workers prior to work commencing, and allow staggered working times to ensure less persons on site at any given time	The South African construction industry serves all sectors of the economy and is a key driver of socioeconomic development, as it employs over 200,000 people in the Western Cape. With total nominal expenditure on construction works and related activities amounting to more than R430.2bn in 2018, the sector is of great strategic importance to the country. There are risks attached to unattended construction sites, including damage from weather related incidents (as well as the ability to work in winter months based on weather). Security cost- break-in and damage as people are becoming desperate, maintenance- the additional cost added to an industry that was already on its knees prior to the National Lockdown. Allowing all construction to commence at level 4 would mean that that there is less risk to the public. This is also an industry that is used to safety procedures and adding extra hygiene requirements would not be seen as an issue. The construction industry has also alluded to its already perilous state in South Africa, and the "potential litigation issues" that come with Covid-19, such as when major projects are not completed on time due to lockdown.
Additional Proposal	Commercial building projects	Allow the re-opening of all levels of construction- with the option of split shifts which will ensure social distancing is adhered too	
Additional Proposal	To clarify that the construction works of renewable energy projects are included in level 4.	"Construction, testing, signoff and related activities for renewable energy projects"	While section B clearly allows for the operation of utility scale renewable energy plants (IPPs), clarity needs to be provided around the construction of these plants. Some utility scale plants are close to grid connection and need teams of engineers to do the testing, synchronisation and sign off of the project and some still require construction work. Given the vulnerability of energy security in the country, particularly as the economy comes back on line (e.g. the energy intensive mining sector), the construction and completion of these projects needs to be specifically provided for in level 4.

<p><i>E. Wholesale and retail trade, covering stores, spaza shops, eCommerce and informal traders.</i></p>			
<p><i>Additional Proposal</i></p>	<p>Plants including herbs and edibles, seeds and related products</p>	<p>Allow the re-opening of nurseries (retail and wholesale) and florists during level 4 restrictions</p>	<p>The South African floriculture industry has grown significantly since the liberalisation of South Africa's economy through exports. Yet, local sales - mainly through a mature channel of nurseries - remain responsible for 41% of all revenue, whilst employment across the value chain is estimated at 17 500 people. According to media sources and the South African Nursery Association (SANA), Level 4 restrictions allow for the processing of ornamental horticultural products, yet, does not specify the allowance of local sales thereof (See section E of the draft framework). Whilst the sale of non-edible agricultural goods is currently limited to tobacco products under level 4 restrictions, we would like to advocate for the opening of nurseries during this period given the industry's need to support production, maintain local sales, and therefore sustain its social and economic contributions respectively. Outdoor nurseries are low risk and easy to implement safety measures and social distancing and create substantial employment.</p>
<p><i>Additional Proposal</i></p>	<p>Motor Retail</p>	<p>Allow motor retail dealerships to trade as it is a relatively low risk activity and social distancing can easily be practiced in this industry as well as online trading.</p>	<p>Motor retail trade, e.g. new and used car sales (where social distancing can be relatively easily implemented) should be permitted. Car dealerships do not experience large number of customers and are able to adjust their operations where much of the activities of vehicle purchasing can be done online.</p>
<p><i>Additional Proposal</i></p>	<p>The inclusion of sole-proprietors & informal traders.</p>	<p>Sole Proprietors (formalised) Pty (Ltd) and Closed Corporations can show their CIPC certification and informal traders that provide essential service may move around and deliver service showing their municipal permit to SAPS. Sole proprietors do not have any documentation that they can show that allows their movement. In some instances, SAPS or municipal law enforcement or the municipalities themselves are stopping SARS and VAT-registered businesses from operating as they have no form of documentation to show that they offer an essential service. This is not about sole proprietors wanting to register for business relief support – but about just being able to move to trade or provide an essential service.</p> <p>For Spaza shops and informal traders The opening of all informal trade activities from level 4 onwards is to be included. Over the last two weeks, this group has had a number of restrictions lifted. Under Level 4 they can trade in 'any food product' and this includes the sale of hot cooked food. Sale of hot cooked can however, per Level 4 specification - not be sold at trading sites or on the road as – delivery only, is specified (i.e. so if takeaways can't offer trade to public, then neither can the informal traders and spaza shops.</p>	<p>More importantly, municipal permitting is needed. For traders that traded pre-lockdown, issuing new permits have not been a problem. Trader who are wanting to trade for the first time and do not meet the municipal by law requirements – will not be permitted.</p> <p>Registering new informal traders - At this time, many municipalities have indicated that they are only able to special-permit traders that have received (and passed inspection or qualifying criteria as prescribed by your by-laws). Several municipalities have advised that under lockdown conditions normal vetting processes by municipalities of establishments like spaza shops have not been possible. The challenge with this is that there are limited trading spaces, traders trading illegally at non-municipal demarcated areas and spaza shops which do not have town planning approval.</p>
<p><i>Additional Proposal</i></p>	<p>Specialty stores, such as pet and health shops, bakeries and butcheries that are involved in the production and sale of essential goods should be expressly permitted to be open.</p>	<p>Any store involved in the production and sale of essential goods (e.g. pet shops, health food shops, bakeries & butcheries).</p>	<p>There is still uncertainty in relation to the sale of animal food by pet shops. Supermarkets do not sell the same products as pet shops do. Pet shops sell vet-recommended products (and certain animal medication) that are very different to supermarket products. There are millions of cats and dogs that eat the food that the industry sells and for nutritional and health reasons they cannot or choose not to eat the food that is sold by supermarkets. A significant amount of work was undertaken and discussions held prior to the commencement of the lockdown to make these points, which is why the industry believes that the regulations were drafted in the way that they were. The industry does not believe that it was anyone's intention that the interests of South African's 11 million pets should not be considered during the lockdown. Pet food is not a commodity, such as airline. Pet and veterinary stores are also often located in, or closer to residential areas than supermarkets and malls and have fewer customers, and therefore represent a lower possibility of contact and a lower risk for spreading the virus.</p> <p>Health stores supply a wide range of specialty health foods, complementary medicines, hand sanitisers, disinfectants, household cleaning and personal hygiene products, among other things. The complementary medicines sold help people manage their chronic health issues, such as allergies, digestive, hormonal, metabolic and neurological problems, as well as auto-immune disorders. These stores also supply certified specialty food products that address very specific dietary and lifestyle needs, like plant-based diets and intolerances (e.g. gluten and dairy).</p> <p>Bakeries and butcheries form part of the food production and distribution chain.</p> <p>We therefore propose that specialty stores, such as pet and health shops, bakeries and butcheries that are involved in the production and sale of essential goods be expressly permitted to be open, on condition that they only sell essential goods in store, that no goods may be consumed on the premises, and that social distancing and online ordering and home deliveries are promoted.</p>
<p><i>Additional Proposal</i></p>	<p>Ensure effective use of PPE in retail stores</p>	<p>"Any retail operations that require direct personal contact should ensure that the use of PPE by employees is mandatory and by customers is strongly advised and supported."</p>	<p>Any retail operations that require direct personal contact should ensure that the use of PPE by employees is mandatory and by customers is strongly advised and supported to minimize the spread of the virus in establishments that are open to the public.</p>
<p><i>E.1</i></p>	<p>Include horticulture and floriculture products</p>	<p>"Any food product, including non-alcoholic beverages, animal food, <u>horticulture and floriculture products</u>."</p>	
<p><i>E.1</i></p>	<p>Clarify that 'any food' does indeed mean <u>any</u> food.</p>	<p>Any food should be clearly defined as any food, without exceptions i.e. this can include healthy foods, snack foods, junk foods, pre-prepared foods, etc. .</p>	
<p><i>E.2</i></p>	<p>Expand the allowances around the sale of hot food.</p>	<p>The allowance for hot food should include allowing controlled pick up (with off-site consumption), the sale of hot food in supermarkets and at filling stations / truck stops as well as for home delivery.</p>	<p>The selling of hot food is important for the many essential workers who may not have the time to cook after hard and long days of work, for the elderly or infirm who find cooking a challenge and for those for whom access to cooking and fuel is a challenge. Controlled pick up of food would entail the food being pre-ordered and paid for and simply collected with no congregation allowed and the sale of hot food at supermarkets would be managed as per the bakery parts of supermarkets, where customers maintain a safe distance, minimize queuing and ensure fast selection and collection of their products.</p> <p>The motivation for selling hot food at filling stations and truck stops, as motivated for by the SA Long-distance Truckers Association is that while the truck stops along highways are open, they are not allowed to sell cooked meals. As a result, the truck drivers are not really stopping to take a break and have a nutritious meal, and instead stop for a moment or two, buy a cool drink/ packet of chips and then get back in and continue to drive. The break is insufficient to provide a proper rest and leads to substantial fatigue with the drivers. An accident resulting in multiple deaths on 13 April was blamed on driver fatigue.</p>
<p><i>E.10</i></p>	<p>Expand the allowances around the sale of hardware.</p>	<p>All hardware should be allowed to be sold and these sales should not only be to tradespersons, but also to households, but with a focus on home deliveries. In particular, all electrical goods should be allowed to be sold direct to the public. For example extension leads, light bulbs, batteries.</p>	<p>Many hardware needs are to perform work which a householder can undertake themselves and doesn't require a tradesperson to undertake. Many of these items may be urgent or prevent an emergency from occurring. Many of these sales could be done online with home deliveries or organised collections. Additionally, many items such as electrical supplies / accessories, batteries etc. should be regarded as basic goods as they are needed on a frequent basis for multiple purposes.</p>
<p><i>E.15</i></p>	<p>The sale of all textiles and apparel should be allowed.</p>	<p>Amend "Winter clothing, bedding and heaters" to "all clothing"</p>	<p>Monitoring the sale of winter clothing versus other clothing would be incredibly difficult for retailers. Additionally, most clothing retailer stock levels are currently at approximately 10% summer clothing, 15% generic (i.e. for any time of the year) and the rest is winter. The push should rather be for stores to rather curtail numbers of shoppers to ensure social distancing (e.g. floor area divided by 4).</p>
<p><i>E.16</i></p>	<p>The sale of all textiles and apparel should be allowed.</p>	<p>Amend "Children's clothing" to "all clothing" as above</p>	<p>It isn't entirely clear what the limit would be on children's clothing as some children are bigger than those of their age group. Level 4 should allow for the sale of any children's clothing along with the sale of all adult clothing as above.</p>
<p><i>E.19</i></p>	<p>Clarity to ensure that the sale of contracts and data to operate this equipment is also covered.</p>	<p>"Personal ICT equipment including computers, mobile telephones and other home office equipment <u>along with required services such as the sale of contracts and data</u>"</p>	<p>Clarity is required here to ensure that the sale of contracts and data to operate this equipment is also covered. These sales could be done online.</p>

Additional Proposal	Allow for the sale of bicycles, bicycle spares and bicycle equipment	Add in 'Bicycles, bicycle spares and bicycle equipment'	<ul style="list-style-type: none"> - The cycling industry contributes between R1.5 billion and R2 billion / annum to the GDP. - An estimated 100 000 people are employed in the South African cycling industry, the majority of these being un-skilled workers that have been up-skilled into their current positions through on the job training and apprenticeships. - The industry is 100% run by SMEs and the informal sector. - While the cycling industry is not directly linked to other aspects of the economy it provides an essential support structure for various aspects of it: Service, maintenance and the supply of parts to the disabled and infirm community, in particular those restricted to the use of wheelchairs and mobility devices. - A large portion of the lower income workforce as well as Scholars/Students use bicycles as a means to get to work or their places of education. The government has invested heavily in these projects. Without the maintenance and spares support, these initiatives will stall, forcing people to use the public transport system impacting on them financially and placing them more at risk to the exposure of Covid-19. - South Africa has a strong sporting cycling community with in-roads being made in terms of growing the number of members from previously disadvantaged communities and a number of South Africans featuring prominently on the international racing scene. Should there be significant closures and retrenchments in the cycling industry, this will have a negative impact on these initiatives. - The cycling industry is an enabling industry in that it has no formal training sector, but rather mechanics and sales staff start as unskilled workers that are then trained to service, maintain and sell bicycles. New staff members are upskilled through apprenticeships and on the job training. - Transmission risks are low as a typical bicycle store has only a few sales staff and a few mechanics depending on the size of the store. It will be relatively simple to enforce social distancing as each mechanic has a separate workstation while sales staff members are situated on the sales floor. Due to the amount of space needed to display bicycles there is ample room for the staff to maintain social distancing. The industry is able to provide staff with the required PPE. - The cycling industry has not been operating throughout the lockdown period. Other than the impact this has on the cycling industry itself, it directly impacts the lower income workforce's ability to get to work. - Bicycles are not only a means of exercising but a basic means of transport. A means of transport that enforces social distancing and improves health but this activity requires support. The inability for the commuters bicycle to be serviced or repaired impacts on them economically as they will now need to pay for public transport. - The cycling industry is quite an immature industry made up of SMMEs and a number of informal operations where people make a living by servicing bicycles from their residence as well as in the previously disadvantaged settlements. As a result of the economic downturn and the impact the exchange rate has had on pricing the industry has been surviving on very low margins. This makes it almost impossible to build the level of cash reserves required to be able to pay staff let alone landlords during this period. - The cycling industry is a fairly seasonal trade with the majority of the turnover being generated during the summer months. The combination of no income during the month of April and now heading into the month of May along with the limited cash reserves will most certainly result in the workforce being retrenched. A bicycle shop is a stock intensive entity and the owners are now faced with a situation that if they remain closed for a longer period they will have no choice but to sell the product that they have in stock at prices even blow cost just to generate cash flow. Once they have used the cash they have generated to cover their overheads and salaries they will simply not be able to continue trading close to the levels they have been. Coupled with the impact of a quieter winter period there is no question that stores will never recover and will eventually close. - The majority of the workforce in a bicycle store are lower income workers not earning significantly more than the minimum wage. They are generally the bread winners for their households and any job losses will have an impact not only on the individual but on the entire household.
General comment on eCommerce	eCommerce	The proposed Level 3 restrictions should be elevated to Level 4 to open up eCommerce for all retail.	<p>eCommerce allows for the promotion and opening of retail while promoting COVID-19 restrictions such as social distancing. It keeps people away from physical stores while at the same time allowing them access to all goods. eCommerce retailers should be able to sell the same products that are available in 'brick & mortar' stores. All finished goods in stock should be available for retail.</p> <p>This requires access to couriers services for fulfillment. The eCommerce companies and couriers are capable of practicing all recommended procedures. eCommerce and courier services (including food delivery services) will reduce the impact of self-isolation and quarantine, thereby increasing mental wellbeing.</p> <p>As a minimum, we request that items related to the preparation of food preparation tools (pots, pans, cutlery, microwaves, kettles etc.) be allowed at all Levels. The best form of social distancing is to prepare and eat food at home, but many homes do not have the necessary tools to do this. To date there has been no clarity about the sale of food preparation products.</p>
F. Information and communication services:			
F-3	eCommerce	The proposed Level 3 restrictions should be elevated to Level 4.	<p>eCommerce requires access to couriers services for fulfillment. The eCommerce companies and couriers are capable of practicing all recommended procedures. eCommerce and courier services (including food delivery services) will reduce the impact of self-isolation and quarantine, thereby increasing mental wellbeing. As requested above, eCommerce retailers should be able to sell everything that is sold in the 'brick & mortar' stores and all finished goods in stock.</p>
G. Media and entertainment services:			
G-2	All FILM productions using local crews should be allowed	LEVEL 4: All productions using local crews and resources (all complying with appropriate protocols). In addition, productions for local broadcast and live streaming in support of COVID-19 subject to directions	<p>The film industry, which is part of the cultural or creative industries, has become recognised for both its social and economic contribution in many economies, including South Africa. The industry has evolved into a completely distinct art form that provides leisure, education/information and cultural understanding, while contributing to numerous economic components such as production, employment and economic growth. In South Africa, there are multiple policies and plans that identify the industry as a catalytic sector with substantial potential to affect the development of the economy. The national film industry is quite large in terms of its outputs as well as its contribution to GDP, income and taxes. Over the four-year National Film and Video Foundation study period, had an expenditure of R17.5 billion (direct production injection) resulted in non-direct expenditure of R22.4 billion, which totaled to a R39.9 billion increase in production. The 2016/17 multiplier is R2.81 million, thus for every R1 million invested the film industry creates other production of R2.81 million. The key opportunities that may drive the growth of the overall industry lie in the diverse attraction venues available for shooting films, which are strengthened by existing support structures and access to the global market. The screen sector is truly a manufacturer (NOT a "gathering") and is also a key driver of EXPORTS – AND that it subsumes activity from/creates activity in a very wide variety of other sectors. It is, in fact, the only industry that reflects (and therefore hires and/or commissions services from) ALL major physical, service, technical and digital sectors.</p> <p>With continued recognition and some encouragement from Government, the screen sector can be a key component of South Africa's economic and cultural recovery – i.e. "the future" (as soon as the country can open up in a major way). So it is important to take steps now to ensure that future can be realised.</p> <p>Also need to recognise that, while health and safety IS and MUST be paramount, delay in taking up the challenge/opportunity will undoubtedly lead to other places getting big "wins", given that Covid-19 is a global issue that will inevitably lead to further competition as markets are able to open again. South Africa deserves to have its chance of securing some of that business – it's a NEW chance, analogous to a "reset". So hard work has been/is being done to take the BEST practices and to design also associated South Africa-specific protocols to assure that the sector restarts with the best chance for that future success, with best practice safety protocols managed by stakeholders, which already exists in regulation (e.g. Film permit offices). Lockdown allows the production crews access to relevant public spaces (streets, beaches, etc.) without much interaction with the general public. This will allow the sector to exercise the strict health rules agreed to.</p> <p>The request is to allow productions using local crews and resources in addition to productions in support for COVID-19</p> <p>There are currently a number of people who operate in this industry that are unable to receive any support, allowing productions using local crews and resources to continue would assist a number of freelancers.</p>
H. Financial and business services:			
Additional Proposal	BPO curfews	Clarity on the level 4 reprieve for the BPO sector. Many BPO operate at night to service both the local markets after hours and the international markets (due to time zone differences)	<p>The outsourcing services sector employs roughly 250 000 people in South Africa as at 2018's figures. Over the past 3 years the sector has added on average 12 000 new jobs. The sector's current focus is to stimulate growth from international markets, which currently accounts for roughly 20% of the total jobs created, not to mention the much needed foreign revenue it earns the country. A significant portion of these international clients our sector services operate in time zones vastly different from South Africa's. The sector has been maturing over the years and is ready to capitalize on the opportunities presented by this pandemic as it has resulted in jobs being shed in other countries around the world. The sector welcomes the concessions being offered by the Level 4 inclusion but seeks clarity or would like to propose the following:</p> <ol style="list-style-type: none"> 1. Distancing: The current Call Centre Directives (Government Gazette) refer to "social distance standard of at least one and a half square meters" (5.2.3.2) but section R9 calls for 2m distancing. The sector seeks clarity on this and furthermore would like to propose the initial derivative of 1,5m being acceptable. Furthermore, should the distancing of 1,5m be acceptable we urge you to consider waiving 30% workforce requirement. 2. Curfew: Many of operators service international clients that operate in time zones vastly different to South Africa's. In order to adequately service these existing clients, as well as the additional clients the sector aims to sign on due to the opportunity COVID-19 has presented the sector as mentioned above, the sector requests exemption from the curfew. 3. Canteen services: In order to exercise stricter controls in the operating environment, the sector advocates the permission to operate canteens under strict health conditions. This will limit staff movement in and out of the operating environment therefore reducing the risks to staff members 4. Wearing of gloves and masks: Being audible is key for this sector, wearing a mask and speaking provides a very inaudible sound as experienced by the ministers in the briefing on Saturday 25.04.2020. Thus it is suggested that masks are worn in and out of the work environment, but allowed to be removed when speaking on the headsets provided that strict distancing is adhered to. <p>With the tourism and events sectors due to gradually re-open at a later stage, there is a great opportunity to position well trained staff into the outsourcing services industry.</p>
H-7	Real Estate agents to be able to collect information critical to the execution of their work	Data collection enabled for Commercial and Residential real estate	<p>The negative impact of COVID-19 on real estate has been significant. In order to stimulate demand in the sector, Wesgro proposes that commercial and residential real estate agents be permitted to access properties that are for sale in order to conduct: collecting photographs of the site; development of virtual tours to promote online viewings.</p>

I. Accommodation and food service activities:			
J-2	Collections from restaurants allowed via prudent system	Allow collections from restaurants	The Restaurant Association of South Africa (Rasa) estimates that restaurants employ 800,000 people in South Africa, many of which are unskilled As the current proposal stands, no pick-ups from restaurants are permitted. Wesgro proposes an amendment to this proposal to allow for collections from restaurants under a 'food-drop' system. This proposal seeks to enable restaurants that do not have access to delivery systems, or restaurants in areas that do not have access to e-delivery structures, to continue operations. Example methodologies: (i) drop system for vehicles whereby restaurants drop prepared meals on the car bonnet for collection to minimize contact; (ii) enabling a single collection point system (similar to drive-throughs)
Additional Proposal	Trading from drive through facilities should be allowed.	Takeaway outlets that offer drive through services should be allowed – health and safety measures both for the customer and worker can be easily managed	Drive through facilities should be allowed where possible.
I.2	Expand the allowances around the sale of food from food services..	*Restaurants, <u>take aways and other forms of food services</u> only for food delivery services <u>and controlled collection</u> (9am-8pm) and subject to curfew (no sit down or pick-up allowed)	The regulations should speak to specific functions / activities of restaurants, fast food and other forms of food services rather than to the establishments. i.e. all food that can be collected in a controlled manner (online ordering and pre-payment to prevent any waiting times and congregation of people) should also be allowed.
J. Transport, storage and communication services:			
	A note on clarity of regulation around implementation of exports	The current challenge we face is that National government is releasing new Regulations on the movement of goods almost on a daily basis leaving companies to interpret one regulation upon the next. We have to interpret them while keeping in mind the impacts they have on capacity and infrastructure at the ports. More certainty around these regulations are needed with a consolidated view release in the coming week. It is crucial that there is consensus on interpretation of what can be exported and on what paperwork is required.	
	Allowance of priority non-agri exports incl:		
J-1, J-4	- food and agri-processed goods,	Include agri-processed goods for exports, and specify transport and logistics to enable exports of such goods (non-agricultural food and drink items made out of agricultural products), and avoid misunderstanding by authority bodies during implementation of regulation on the ground	The agro-processing industry is among the sectors identified by the Industrial Policy Action Plan (IPAP), the New Growth Path and the National Development Plan for its potential to spur growth and create jobs because of its strong backward linkage with the primary agricultural sector. In 2018, South Africa's total exports of agro-processing products amounted to R124.21 billion. Approximately 9.96% of South Africa's total exports are accounted for by the agro-processing industry, contributing 4.4% share of total employment in South Africa. Given the significant role the agri-processing industry play in the South African economy, and its potential to spur growth and create jobs, Wesgro propose for the agro-processed goods to be specified as a permitted goods for exports, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	- Wine of fresh grapes	Include wine for exports, and specify transport and logistics to enable exports of wine, and avoid misunderstanding by authority bodies during implementation of regulation on the ground	The South African wine industry GDP contribution to the SA economy (most of it being based in the Western Cape) is more than R49 billion per annum and it creates 290,000 job opportunities directly and indirectly. These figures include a R7.5 billion excise and VAT contribution from wine related products to SARS in 2019. Wine is South Africa's second biggest agricultural export and earns more than R9 billion foreign revenue annually. The industry exports approximately 50% of its production whilst the remainder is sold in the local economy. Wine is, in the global official nomenclature, classified as an agricultural food product. This is confirmed by SA's main competitor nations in export markets, such as Argentina, Chile, Australia, USA and New Zealand, who all classify wine as an agricultural food product and their governments are allowing exports to continue during the current crisis. South Africa is the only wine producing country experiencing such a ban on exports during the Covid-19 crisis. The initial three week ban during the lockdown is estimated by industry to have direct export revenue loss of more than R650 million (FOB value). With that said, the damage to reputation of consistent supply and future market will be astronomical and will be exponentially more than this figure. Not being able to export as soon as possible will place a severe strain on the future competitiveness of the industry and will result in delisting of many South African wines on the shelves abroad. As such, Wesgro propose for the wine industry to be specified as a permitted retail good for exports, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	- cigarettes, (Cigars, cheroots, cigarillos and cigarettes, of tobacco or of tobacco substitutes)	Include tobacco for exports, and specify transport and logistics to enable tobacco exports, and avoid misunderstanding by authority bodies during implementation of regulation on the ground	The tobacco manufacturing industry in South Africa is estimated to be worth close to R30bn as of December 2019. The cigarette industry alone contributed R10.9bn in excise duty to the fiscus in 2017/2018. As of 2011, the primary tobacco industry in South Africa employs about 10 000 agricultural workers, tobacco producer organizations employ 800 people, whilst the manufacturing industry employs 3 000 employees. Western Cape exports alone accounts for R1.8b per annum (2019), ranking as the 14th largest export group for the region. Given the size of the sector, in terms of employment, contribution to GDP and export potential for SA and Western Cape, Wesgro propose for the tobacco sector to be specified as a permitted retail good, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	- beauty or make-up preparations	Allow for the manufacture and export of beauty or make-up preparations given current export value to the Western Cape and future potential export value as some countries now view products as an essential	Beauty or make-up preparation exports from the Western Cape was valued at R1.58 billion (2019) and has been deemed by some countries as an essential product (particularly in the East). There has been an increase in demand particularly for the well known South African brand - Bio Oil. Potential here is to further forex inflows to SA given increased demand under COVID - 19 pandemic, along with other health related products included in this classification e.g. rootboos based products etc. Union Swiss – a significant player and local producer in this industry, is unusual in that it has significantly larger exposure to the global market than to the local market. A disproportionate amount (91% of its income is collected through export sales. If Union Swiss cannot manufacture and export Bio-Oil products to meet the current global demand, it risks losing significant international market share to overseas competitors that are still manufacturing. Global market share and customer loyalty has been hard won, and once lost is not something that could easily be reclaimed.
J-1, J-4	- yachts and boats,	Include Boat building and Marine manufacturing and exports, given the value of exports to South Africa and forex potential to be earned	Boat building factories by nature are large spaces that allow social distancing. Members have undertaken to have a minimum 3sqm working space once the deck and hull are joined on the actual boat. Approx. 200 boats (range from small to large) to be exported to fulfill this order (R2.7bn confirmed export orders *FOREX for SA. Direct employment 4000, indirect 7000 (supply chain). The SA industry has Franca as their main competitor and they have gone back to production. SA industry is currently at number 2 in terms of global catamaran production and number 1 in power catamaran production. The sector has adopted a risk mitigation health and safety protocol. All members have been advised to undertake a risk assessment of their own workplaces and to draw up company specific guidelines that reiterate/align with government guidelines and further address specific mitigations needed relevant to work processes
J-1, J-4	- engine parts,	Include the export of engine parts under HS code 8409	Exports of engine parts under HS code 8409 contribute R2.17 billion of the Western Cape's exports in 2019. A significant supplier is an organisation called Atlantis Foundries. Annually, approximately 129,000 high quality products are sold, in excess of 46,000 tonnes of cast iron. The organisation ships products to Europe and the Americas .
J-1, J-4	- jewellery,	Include and specify transport and logistics to enable exports of jewelry products	The Western Cape produces over 20% of the total jewelry manufactured in South Africa, accounting for R1.37bn of the province's exports - 95% of Western Cape jewellery exports are to North American countries. Wesgro propose for jewellery to be specified as a permitted retail good, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	- plants and herbal products.	Include and specify transport and logistics to enable exports of plants and herbal products	The South African floriculture (and ornamental horticulture) industry has grown significantly since the liberalisation of South Africa's economy through exports. Over 50% of revenue is accounted for in export sales, whilst employment across the value chain is estimated at 17 500 people. According to IOL news and the South African Nursery Association (SANNA), Level 4 restrictions allow for the processing of ornamental horticultural products, yet, does not specify the allowance to export. Wesgro propose for live trees and other plants to be specified as a permitted retail good, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	- or export of any other product that's essential in another country	Allow a direct line for application for permission to export by companies that produce and export goods which are classified as essential in other countries (and not in SA).	These are goods that are not classified as essential, or do not form part of L4 re-opening, but there is a high demand for them in an export market. An economic recovery argument should be based on foreign revenue earnings potential (especially given the current weakness of the Rand) and rational economic prudence should dictate that if there is a good being produced in South Africa, which is in demand in a foreign market and it is possible to allow for the export of such a good, without compromising health precautions, there should be a route for arguments to be presented for permission to export. Such exemptions should be company specific or product specific, and need to be standardised and accepted without argument by the likes of Transnet, SAPS, and SARS.
J-1, J-4	- Cider	Include cider for exports, and specify transport and logistics to enable exports of cider, and avoid misunderstanding by authority bodies during implementation of regulation on the ground	Cider is an important agri-processed product made of apples and other fruit and is one of the Western Cape's top exports, especially into the rest of Africa. Cider has a high employment multiplier. South Africa is the 7th largest exporter of cider globally and almost half of South Africa's apple concentrate is used for local cider production. Wesgro propose for ciders to be specified as a permitted retail good, to not only neighbouring countries, but the rest of the African continent and other international markets.
J-1, J-4	Imports	Allow movement and warehousing of imported goods	It should be clarified that the lockdown regulations as amended on 16 April stipulate that imported goods may be transported from the port to their "intended destination". The SARS practice notes of 6, 7 and 19 April which stipulate that these goods may only be transported to SARS approved/designated warehouses and kept there until the lockdown ends, is not in line with the regulations and imposes a tremendous financial burden on the importers in terms of storage costs, at a time that they are unable to operate.

<i>Additional Proposal</i>	Allow for the sale of bicycles, bicycle spares and bicycle equipment	Add in "Bicycles, bicycle spares and bicycle equipment"	<ul style="list-style-type: none"> - A large portion of the lower income workforce as well as Scholars/Students use bicycles as a means to get to work or their places of education. The government has invested heavily in these projects. Without the maintenance and spares support, these initiative will stall, forcing people to use the public transport system impacting on them financially and placing them more at risk to the exposure of Covid-19. - South Africa has a strong sporting cycling community with in-roads being made in terms of growing the number of members from previously disadvantaged communities and a number of South Africans featuring prominently on the international racing scene. Should there be significant closures and retrenchments in the cycling industry, this will have a negative impact on these initiatives. - The cycling industry has not been operating throughout the lockdown period. Other than the impact this has on the cycling industry itself, it directly impacts the lower income workforce's ability to get to work. - Bicycles are not only a means of exercising but a basic means of transport. A means of transport that enforces social distancing and improves health but this activity requires support. The inability for the commuters bicycle to be serviced or repaired impacts on them economically as they will now need to pay for public transport. - There are examples internationally where the cycling industry has been allowed to re-open in conjunction with the community being allowed to exercise. In the UK, Denmark and the Netherlands bike shops are exempt from store closures. In Austria bike stores were re-opened on the 14th of April and Germany bike shops where re-opened on the 20th of April.
<i>Additional Proposal</i>	SMME's	Classification of SMME's to be inclusive across all sectors as well as disaster relief provided.	The SMME sector should not be considered as separate since these categories of businesses straddle all the identified sectors mentioned above. SMMEs makes a significant contribution to GDP and job creation within these sectors (e.g. clothing and textile and construction). The lack of understanding what the easing of the lockdown conditions will mean for SMMEs and over what time period this will happen is problematic because the uncertainty implies that it is difficult for businesses to plan (e.g. difficult to determine cash flow projections). The concern is that the fiscal stimulus packages are not large enough nor has it been enacted swiftly enough to not only mitigate the impact of a recession but also the survival of SMMEs. The impact on downstream businesses and the extent of the support linked a sector (and/or sub-sector) should be considered (e.g. should support be provided to restaurants will laundromats or napkin providers also be assisted who supplies to restaurants). Support to independent contractors or sole proprietors across sectors should be considered since they play a critical role in the economy. Although many of these businesses will be able to operate they will struggle to cover monthly expenses such as rent and operational costs. This necessitates the need for a credit guarantee scheme to deal with bridging finance or grants to be extended to SMMEs to facilitate their operations over the next three to six months. Due consideration should be given to sectors with narrow margins and the associated need for relief is critical.
<i>L: Repair and related emergency services</i>			
<i>L2</i>	Repairs to emergency vehicles	Allow repair of motor vehicles by all repairers (from small scale to dealerships), subject to conditions, e.g. similar to that imposed on supermarkets in terms of customer number on site, that ensure worker and customer health and safety	Not only limited to persons' vehicles who are considered to be engaging in essential services. These retailers do not receive many customers on a daily basis (hence social distancing can be done) and distribution could be done based on pre-ordering and collection.
<i>M: Supply Chains</i>			
	Transport of liquor supplies to retailers.	Allowance is to be made for the transportation of liquor to enable traders to safeguard their inventory.	Due to the safety concern of liquor retailers in particular the transportation of their supplies to needs to be safeguarded to protect their value chains and prevent safety risks.
<i>P: Health, social & personal services</i>			
<i>Additional Proposal</i>	Allow for laundry and dry cleaning services at level 4 instead of level 3	Laundry and dry-cleaning services permitted;	<ul style="list-style-type: none"> - Laundry businesses promote the wellbeing of the community and the livelihood of the most vulnerable. Laundry functions mitigate the risk of transmission and spreading of the virus by ensuring our customers clothes, blankets and bedding are clean as the virus can stay in materials for up to 10 days. - Not all citizens have washing machines and, in tough economic times, including water restrictions limits and water costs, many consumers prefer to have their washing done at a laundry. Additionally, essential service workers such as doctors, firemen, policemen and traffic officers make use of laundry services as they do not have the time before or after work to do laundry. - Many laundry services also provide assistance to old age homes, clinics and hospitals. Without the laundry services available, laundry is in cases piling up as these facilities don't always have washing machines and driers on site. - Similar to the retailers' operations during lockdown, laundry shops can be controlled (size 80 square metre) and duties performed behind closed doors as the customers literally drop off their washing at the shop front door and head home. There is no social gathering, the environment can be controlled, and the staff would be provided with face mask and hand sanitiser. A detailed register would be kept of all the customers visiting the shop for assistance and available for inspection. Additionally, the staff temperature will be screened and documented daily for record keeping purposes.
<i>R: Personal Movement</i>			
<i>R1</i>	Movement across Provinces	Allow for the movement of individuals such as farm workers who are seasonal employees to their place of employment for sectors allowed to trade under level 4.	The movement of people during lockdown was restricted but for particular sectors such as Agriculture seasonal workers are essential during specific harvest periods. Currently there are workers that completed harvests for particular crops that need to return home and other crops such as Citrus require seasonal workers from other Provinces to travel to their farms to assist with the harvest. This was a challenge in the level 5 regulations and places an enormous constraint on the Agriculture sector which should be fully operational from level 4 onwards. Please reconsider the allowance for the movement of particular employees for particular sectors.