



Suite No.2, Art Centre, 22 6th St, Parkhurst, Johannesburg, 2193
PO Box 1560, Parklands, 2121 | Tel: +27 11 788 1278 | Fax: +27 11 788 1289
Email: info@mma.org.za | www.mediamonitoringafrica.org

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TO: Ministry of Finance
c/o Rita Coetzee
By email: rita.coetzee@treasury.gov.za

SUBMISSION BY MEDIA MONITORING AFRICA:

**ECONOMIC TRANSFORMATION, INCLUSIVE GROWTH AND COMPETITIVENESS:
TOWARDS AN ECONOMIC STRATEGY FOR SOUTH AFRICA**

For more information, please contact:

William Bird, Director, Media Monitoring Africa

E-mail: williamb@mma.org.za

Tel: +27 11 788 1278

Thandi Smith, Head of Policy, Media Monitoring Africa

Email: thandis@mma.org.za

Tel: +27 11 788 1278

*This submission was prepared with the assistance of Power Singh Inc.
For more information, please visit <https://powersingh.africa/>.*

INTRODUCTION

1. Media Monitoring Africa (MMA) welcomes the opportunity to provide this submission to the Ministry of Finance (the Ministry) on the discussion paper titled 'Economic transformation, inclusive growth and competitiveness: Towards an economic strategy for South Africa' (the Discussion Paper). At the outset, MMA wishes to acknowledge the consultative approach taken by the Ministry in seeking input on the Discussion Paper, as this will serve to ensure that the Discussion Paper is ultimately more robust and better able to meet its intended objectives.
2. This submission focuses on certain key aspects dealt with in the Discussion Paper that fall within our areas of expertise, namely (i) universal access to the internet and other information and communications technology (ICT); (ii) the importance of addressing the shortcomings in spectrum allocation and digital migration; and (iii) the need to strengthen the South African Broadcasting Corporation (SABC) as the public broadcaster and a state-owned entity (SOE). Accordingly, this submission is structured as follows:
 - 2.1. **First**, an overview of MMA and our relevant expertise.
 - 2.2. **Second**, the role of universal access to the internet and other ICTs for economic growth and development, including our proposed 7-point plan to achieve this.
 - 2.3. **Third**, the importance of addressing the shortcomings in spectrum allocation and digital migration.
 - 2.4. **Fourth**, our proposals to achieve better coordination amongst relevant stakeholders in respect of ICTs and internet governance more broadly.
 - 2.5. **Fifth**, the need to strengthen the SABC as the public broadcaster and an SOE.
3. Each of these points is dealt with in turn below. We submit that each of these aspects has an important and interrelated role to play in achieving economic transformation and inclusive growth in the country. Further, we submit that the failure to address these issues as part of the Discussion Paper and the broader economic strategy in the country will serve to deepen the existing socio-economic divide to the detriment of the most vulnerable sectors of our society.

OVERVIEW OF MEDIA MONITORING AFRICA

4. MMA is a not-for-profit organisation that has been monitoring the media since 1993. MMA's objectives are to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. The three key areas that we seek to address through a human rights-based approach are media ethics, media quality and media freedom.

5. MMA aims to contribute to this vision by being the premier media watchdog in Africa to promote a free, fair, ethical and critical media culture. We have over 20 years' experience in media monitoring and direct engagement with media, civil society organisations and citizens. MMA is the only independent organisation that analyses and engages with media according to this framework. In all of our projects, we seek to demonstrate leadership, creativity and progressive approaches to meet the changing needs of the media environment.
6. For more about MMA, please visit: www.mediamonitoringafrica.org.

IMPORTANCE OF UNIVERSAL ACCESS TO THE INTERNET

Section 2.2 of the Discussion Paper

7. Section 2.2 of the Discussion Paper deals with telecommunications, including aspects relating to competition, spectrum allocation and broadband rollout. As a point of departure, MMA welcomes several of the findings contained in the discussion document, including the following:
 - 7.1. That the cost of communicating is excessively high in South Africa.
 - 7.2. That open access conditions should be imposed to minimise unnecessary duplication of infrastructure and bring about services-based competition.
 - 7.3. That the Independent Communications Authority of South Africa (ICASA), by its own admission, has been a weak regulator – to the benefit of the incumbents – and needs both stronger powers of enforcement and independence.
 - 7.4. That the delay in digital migration and the spectrum allocation process is the biggest constraint on the growth of the telecommunications sector, and is a bottleneck for broader economic growth.
8. However, in addition to the above findings, MMA urges the Ministry to go further and expressly draw attention to the public interest considerations that should guide the economic strategy regarding telecommunications. It is imperative, in our view, to address this matter through a rights-based lens, and to ensure that the respect, protection and promotion of fundamental rights remain at the core.
9. The socio-economic divide in the country has also manifested in a digital divide, with approximately half the population remaining offline. There is an urgent need for steps to be taken in offering a reprieve to users who are directly and adversely impacted by the untenable state of data pricing as it currently stands.

10. Notably, in 2018, South Africa accepted the following recommendation from the United Nations Committee on Economic, Social and Cultural Rights (CESCR) in terms of its commitments under the International Covenant on Economic, Social and Cultural Rights:¹

“Access to the Internet

- (1) The Committee is concerned at the low rate of Internet access, particularly in rural areas and in schools, and at the lack of affordability of the Internet for the most disadvantaged groups (art.15).
 - (2) The Committee recommends that the State party adopts relevant measures to ensure the accessibility and affordability of the Internet, particularly in schools, rural areas and for the most disadvantaged groups.”
11. We are deeply concerned that, notwithstanding the state having adopted this recommendation, insufficient measures have been taken to redress this challenge. As such, MMA calls on the Ministry to highlight through the Discussion Paper that more needs to be done to ensure meaningful and universal access to the internet for all persons in South Africa, and the role that the internet has for economic growth and development, as well as economic opportunities. This requires, among other things, a clear, inclusive and cohesive regulatory framework; an understanding of access that goes beyond mere coverage; and an approach that grapples with the range of components, including the cost of the data and the devices, digital literacy, and the availability of relevant content in appropriate languages.

The role of access to the internet in the realisation of other fundamental rights

12. The importance of access to the internet, both as a self-standing consideration and in the broader context of its role in promoting the realisation of other fundamental rights, has become well-established under domestic and international law. This includes the role that access to the internet plays in, for example, sharing and receiving information and ideas; banking; marketing; exploring the job market in the exercise of the right to work; engaging in political discourse; mobilising; and facilitating the right to education. All of these facets are fundamentally intertwined with economic development and growth, and must necessarily form part of any economic strategy that is adopted by the state.
13. The converse is that those who are unable to access the internet are negatively impacted in their enjoyment of these rights. The empowering and democratising effect that the internet can have is wholly denied to those persons for whom access to the internet falls beyond their reach. We note in this regard that access entails two distinct but interrelated dimensions: (i) access to content online; and (ii) access to the physical infrastructure to enable access to such online content. The United Nations Economic, Social and Cultural Organization (UNESCO) was amongst the first international bodies to call on states to take steps to realise a right of access to the internet. In this regard, it stated that:²

¹ CESCR, ‘Concluding report on the initial observations on South Africa’, E/C.12/ZAF/CO/1, 12 October 2018, at paras 76-77.

² UNESCO, ‘Recommendation concerning the promotion and use of multilingualism and universal access to cyberspace’, 2003, at paras 7 and 15.

“Member States and international organizations should promote access to the Internet as a service of public interest through the adoption of appropriate policies in order to enhance the process of empowering citizenship and civil society, and by encouraging proper implementation of, and support to, such policies in developing countries, with due consideration of the needs of rural communities.

...

Member States should recognize and enact the right of universal online access to public and government-held records including information relevant for citizens in a modern democratic society, giving due account to confidentiality, privacy and national security concerns, as well as to intellectual property rights to the extent that they apply to the use of such information. International organizations should recognize and promulgate the right for each State to have access to essential data relating to its social or economic situation.”

14. In 2012, the United Nations Human Rights Council (HRC) passed an important resolution that “[called] upon all States to facilitate access to the Internet and international cooperation aimed at the development of media and information communications facilities in all countries”.³ This was subsequently given further content within the United Nations Sustainable Development Goals (SDGs), which recognise that “[t]he spread of [ICTs] global interconnectedness has great potential to accelerate human progress, to bridge the digital divide and to develop knowledge societies”.⁴ In terms of the SDGs, states are further implored to enhance the use of ICTs and other enabling technologies to promote the empowerment of women,⁵ and to strive to provide universal and affordable access to the internet in least developed countries by 2020.⁶
15. In a significant development in 2016, the HRC affirmed that “the same rights that people have offline must also be protected online, in particular freedom of expression, which is applicable regardless of frontiers and through any media of one’s choice, in accordance with articles 19 of the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights”.⁷ The HRC further recognised the global and open nature of the internet as a driving force in accelerating progress in various forms, including in achieving the SDGs.⁸

³ HRC, ‘Resolution on the promotion, protection and enjoyment of human rights on the internet’, A/HRC/20/L.13, 29 June 2012 at para 2. This was expanded upon further the following year in HRC, ‘Resolution on the promotion, protection and enjoyment of human rights on the internet’, A/HRC/Res/26/13, 14 July 2014.

⁴ United Nations General Assembly, ‘Transforming our world: The 2030 agenda for sustainable development’, A/Res/70/1, 21 October 2015 at para 15.

⁵ *Id.* at goal 5(b) at p 18.

⁶ *Id.* at goal 9(c) at p 21.

⁷ HRC, ‘Resolution on the promotion, protection and enjoyment of human rights on the internet’, A/HRC/32/L.20, 27 June 2016.

⁸ *Id.* at para 2.

16. The resolution also affirmed the importance of applying a comprehensive rights-based approach in providing and in expanding access to internet, and called on states to consider formulating and adopting national internet-related public policies with the objective of universal access and the enjoyment of human rights at their core.⁹ Two categories of persons were recognised as being deserving of special attention:
 - 16.1. The first relates to women and girls. The resolution echoes the call contained in the SGDs for states to bridge the gender digital divide and enhance the use of enabling technologies, in particular ICTs, to promote the empowerment of all women and girls.¹⁰ MMA submits that this should be extended to all children more broadly.
 - 16.2. The second relates to persons with disabilities. In this regard, the resolution calls on states to take appropriate measures to promote the design, development production and distribution of ICTs and systems that are accessible to persons with disabilities.¹¹
17. Also in 2016, the African Commission on Human and Peoples' Rights (ACHPR) similarly affirmed that the same rights that people have offline must also be protected online, and called on states to promote and facilitate access to the internet and international cooperation aimed at the development of media and information and communications facilities in all countries.¹² The ACHPR further called on states to respect and to take legislative and other measures to guarantee, respect and protect citizen's right to freedom of information and expression through access to internet services.¹³
18. Despite the growing body of commitments requiring proactive measures to be taken towards universal access to the internet, particularly given the role that the internet plays in achieving the full array of fundamental rights through its contribution to economic growth and development, there is self-evidently insufficient measures that have been taken or effectively implemented to bridge the digital divide across the various socio-economic disparities that persist in the South African society.¹⁴

⁹ *Id.* at paras 5 and 12.

¹⁰ *Id.* at para 6.

¹¹ *Id.* at para 7.

¹² ACHPR, 'Resolution on the right to freedom of information and expression on the internet in Africa', ACHPR/Res.362(LIX), 4 November 2016.

¹³ *Id.* at para 1.

¹⁴ As noted in a research report published by the Media Legal Defence Initiative (MLDI):

"Notwithstanding whether the internet is seen as a self-standing right or an enabling tool to facilitate the realisation of other rights, the groundwork has firmly been laid for the need to realise universal access to the internet. States are concomitantly required to take steps to achieve universal access. However, in reality, universal access to the internet is far from being realised. This is due to a confluence of factors, including a lack of financial resources to be able to access the internet, inadequate locally-relevant content, insufficient levels of digital literacy, and a lack of political will to make this a priority."

MLDI, 'Manual on digital rights and freedom of expression online', 2018, at p 21, accessible here: <https://www.mediadefence.org/resources/mldi-training-manual-digital-rights-and-freedom-expression-online>.

19. Earlier this year, the Competition Commission of South Africa (Competition Commission) found the telecommunications sector to be “anti-poor”.¹⁵ This is a grave and deeply concerning indictment on all relevant stakeholders in the sector. According to the Competition Commission: “Access to affordable data is important to low-income consumers because it can enable them to easily and cheaply embark on many activities such as job hunting, paying bills, transferring money, sharing and distributing information and crime prevention amongst other things. Without access to data, these activities require extra money to be carried out.” The following observation made by the Competition Commission is of particularly grave concern:

“What the Inquiry team suspects is that lower income consumers are being exploited with price differences that lack any objective rationale simply because they are poor, lacking in both income and alternative data service options. The implication is that these customers’ usage volumes do not necessarily increase as markedly in response to lower prices, which means operators are less willing to provide lower prices because it reduces total revenues.”

20. The exploitation of lower income consumers by the telecommunications sector is both unconscionable and unacceptable, and should not be allowed to persist. In addition to the work being done by the Competition Commission, we reiterate that there is a key role that the Ministry can play through the Discussion Paper in highlighting the importance of access to the internet in the realisation of an array of fundamental rights – including socio-economic rights – as well as economic growth and development.

Our proposed 7-point plan

21. As set out above, MMA submits that universal access to the internet is a *sine qua non* for the full realisation of fundamental rights, as well as economic growth and development. In this regard, we draw to the attention of the Ministry a joint initiative by MMA, together with the Association for Progressive Communications, the Interactive Advertising Bureau of South Africa and the South African National Editors’ Forum, that has developed a 7-point plan regarding how to achieve universal access to the internet, which includes the following:¹⁶

- 21.1. The implementation of free public access to the internet at government sites, such as schools, libraries and health facilities.
- 21.2. Zero-rated access to government websites and data.
- 21.3. Free wi-fi access recognised as a basic municipal service and run as a public utility, realised through public-private partnerships.

¹⁵ Competition Commission, ‘Data services market inquiry: Summary of provisional findings and recommendations’, 2019, at p 6, accessible here: <http://www.compcom.co.za/wp-content/uploads/2019/04/Data-Services-Inquiry-Summary.pdf>.

¹⁶ An overview of the 7-point plan is accessible here: <https://sanef.org.za/the-international-day-for-universal-access-to-information-and-internet-access/>.

- 21.4. Setting minimum standards for the provision of free internet access, including a minimum data allocation per person per day, and standards for privacy, security, access quality and fair access to information in the public interest.
 - 21.5. The introduction of the concept of My Internet Rights, in terms of which every citizen should be entitled to a daily tranche of free internet access to exercise their information rights.
 - 21.6. The introduction of digital literacy programmes in education curricula and as part of free internet schemes, especially aimed at children and those unfamiliar with risks and opportunities related to the internet.
 - 21.7. The need for relevant oversight bodies to monitor and report on the progressive realisation of internet access rights, and in particular the adoption and implementation of legislation, regulation and policies governing free access to the internet as a basic human right.
22. MMA therefore calls on the Ministry to endorse the 7-point plan as a strategy geared towards achieving universal access to the internet in the interests of economic growth and development. In our view, the 7-point plan adopts an appropriate rights-based approach and strikes an appropriately balance among the different competing interests.

THE NEED TO ADDRESS THE SHORTCOMINGS IN SPECTRUM ALLOCATION AND DIGITAL MIGRATION

23. MMA has long-since expressed our concerns for the delays in digital migration and the release in high-demand spectrum, and the broader impact that this has on the sector and the significant extent to which this hinders access to the internet for the broader public. The regulatory and policy uncertainty that currently exists in the sector is inimical to the realisation of universal access in the country.
24. MMA has several submissions in this regard:
- 24.1. First, MMA notes that it is essential for the existing regulatory uncertainty to be resolved as a matter of urgency, and clear policy guidance be provided by the relevant stakeholders as may be expected in the short-, medium- and longer-term. While the publication of the Policy Direction on Unassigned High Demand Spectrum (the Policy Direction) was initially a welcome step, the Policy Direction has left many questions about the implementation of the Wholesale Open Access Network (WOAN) and the allocation of 5G spectrum bands. As such, the Policy Direction has failed to provide the overarching policy certainty that it was anticipated it would offer, exacerbated by the time lag in any follow-up and implementation thereof.

- 24.2. Second, MMA reiterates that it is imperative that the role of ICASA, as the independent regulator responsible for the telecommunications sector, be safeguarded against any undue interference, and that measures are taken to ensure that it is structurally and fiscally independent.
- 24.3. Third, policy determinations regarding the allocation of spectrum should clearly vest within the remit of ICASA. This is necessary both to enable ICASA to perform its functions and duties independently and without interference, and to facilitate the desired policy certainty by ensuring that the relevant responsibilities are clearly designated and assigned.
25. Further in this regard, MMA urges the need for there to be market-related and regulatory interventions to facilitate – and, importantly, promote – different models for achieving connectivity, with appropriate resource support provided by the relevant stakeholders to enable this to effectively materialise. MMA’s experience in this regard, through the development and implementation of the Shikimoto Community Network, has provided us with insight into the challenges experienced in the licensing, financing and roll-out of such models without the relevant support, particularly if this is to be scaled to widen the reach of the network to be an effective and competitive role-player in the sector.
26. Moreover, MMA emphasises that in the development of any regulatory or policy interventions, a socio-economic impact assessment should be compiled before making a final determination. The purpose of this would be to: (i) minimise unintended consequences from policy initiatives, regulations and legislation, including unnecessary costs from implementation and compliance as well as from unanticipated outcomes; and (ii) anticipate implementation risks and encourage measures to mitigate them. This assessment should include relevant economic-related aspects that provide insight into whether the proposed regulatory measure will have a positive impact on economic growth and development.

THE NEED FOR REGULATORY CERTAINTY AND BETTER COORDINATION AMONGST RELEVANT STAKEHOLDERS

27. MMA submits that an additional factor that has hindered the economic growth of the telecommunications sector has been the regulatory and policy uncertainty that has arisen. There is currently a plethora of laws – or proposed laws – that seek to address different matters regarding access to the internet. However, the different stages of finalisation and implementation of these laws has given rise to significant regulatory uncertainty.
28. This existing state of flux in the regulatory environment will lead potential investors to be hesitant about investing in the country, as the regulatory position may be amended to the detriment of that investor. As such, there is urgent need for there to be improved levels of regulatory uncertainty that persist in respect of the telecommunications sector, any interventions must strive to achieve certainty and consistency for all relevant stakeholders.

29. This regulatory uncertainty is directly linked to the conflation of roles amongst various stakeholders, including various structures and institutions which are facing significant structural and institutional challenges.
30. In MMA's submission, there is a lack of any overarching internet governance policy on how current and proposed legislation that deals with information and digital rights regulation is to be managed by the different role-players or on how co-ordination amongst the various role-players is to function. In the absence of a clear government internet governance policy and legislative guidance, an unduly complex structure of oversight is in the process of being created.
31. The result is that that people in South Africa, civil society organisations, and members of the media, among others, need to navigate an overly complex regulatory landscape in order to engage in public participation, make submissions, conduct their business, and, ultimately, defend and protect their information rights. Additionally, this poses significant challenges to government's coordinated and effective implementation of the existing regulatory provisions, and may result in overlapping mandates or aspects not being assigned or accounted for by appropriate functionaries.
32. A further constitutional consideration relates to cooperative governance and intergovernmental relations. In terms of section 41(1)(c) of the Constitution: "[a]ll spheres of government and all organs of state within each sphere must provide effective, transparent, accountable, and coherent government for the Republic as a whole" and the must "co-operate with one another in mutual trust and good faith by coordinating their actions and legislation with one another".¹⁷
33. Accordingly, MMA has called for the establishment of an Interdepartmental Steering Committee (ISC) on Internet Governance to address relevant matters, including access to the internet. It is proposed that the ISC be led by the Department of Justice, and also comprise representatives from the following role-players:
 - 33.1. Department of Justice and Constitutional Development;
 - 33.2. Department of Communications and Digital Technologies;
 - 33.3. Department of Higher Education, Science and Technology;
 - 33.4. National Treasury;
 - 33.5. National Prosecuting Authority;
 - 33.6. South African Police Service;
 - 33.7. South African Revenue Service;
 - 33.8. State Security Agency;
 - 33.9. ICASA;
 - 33.10. Information Regulator;
 - 33.11. Two representatives from opposition parties represented in the National Assembly;

¹⁷ See section 41(1)(h)(iv) of the Constitution.

- 33.12. Two teachers of law, or members of the attorneys' or advocates' profession, with knowledge of internet governance laws, appointed following a public call for nominations;
 - 33.13. Two technical experts in internet governance following a public call for nominations;
 - 33.14. Two members of civil society organisations working on internet governance following a public call for nominations.
34. We emphasise that the objects should reflect a broader internet governance mandate and the multi-disciplinary, cross-cutting challenges that these issues present, including in respect of economic growth and development that telecommunications can provide to all sectors of society. Moreover, we propose adding representatives from opposition parties represented in the National Assembly, members of the legal profession, technical experts and civil society representatives, to ensure accountability, a diversity of views, and the requisite technical expertise.
35. Accordingly, MMA urges the Ministry to expressly recognise the need for improved policy certainty and coordination among relevant stakeholders in respect of telecommunications and internet governance – on the basis that this will lead to improved investment, economic development and growth in the country, in addition to improving access to the internet and other ICTs – and put forward the proposal for an ISC on Internet Governance as part of the recommendations contained in the Discussion Paper.

THE NEED TO STRENGTHEN THE SABC AS THE PUBLIC BROADCASTER

36. Throughout the Discussion Paper, there is recognition of the need to strengthen and safeguard the independence of SOEs. For instance, the Discussion Paper states as follows:
- 36.1. That the government's commitment to the compact should prioritise strengthening the capability of the public sector and SOEs.
 - 36.2. That, in the context of network industries, poorly managed SOEs with severe governance challenges pose a significant burden on the fiscus.
 - 36.3. One of the causes of South Africa's inability to fully harness productivity benefits is the poor management of SOEs.
37. However, nowhere throughout the Discussion Paper is the SABC expressly mentioned. This is despite the fact that the vast majority of South Africans still depend on the SABC to access relevant content and information, including economic and political information necessary for them to make informed choices. As with other SOEs, the SABC has similarly been beleaguered by poor management, a lack of proper oversight, corruption and insufficient fiscal controls. Further, also as with other SOEs, the SABC needs to be strengthened – and its independence safeguarded – to ensure that it can perform its role as the public broadcaster in communicating relevant economic and political information to the public.

38. MMA therefore urges the Ministry to include express reference to the SABC as one of the SOEs that needs to be properly resourced and strengthened, in order to ensure that its independence is safeguarded. A compromised and defunct SABC is a disservice to the members of the public that depend on the public broadcaster to receive relevant information, and raises broader concerns about the credibility of the country and the political will to ensure a free and fair media. In the absence of the SABC being urgently provided with the necessary resources to continue to conduct its work effectively, and treated with the same importance as other SOEs in the country, we may be on the brink of it being too late to salvage the public broadcaster.

CONCLUDING REMARKS

39. MMA reiterates our appreciation to the Ministry for the opportunity to provide this submission, and we remain available to assist in any ongoing efforts in the finalisation of the Discussion Paper. In particular, MMA urges the Ministry to include the following references and recommendations in the Discussion Paper and its plan of work going forward:
- 39.1. That the Discussion Paper – as well as any economic strategy developed from the Discussion Paper – places the Constitution as the point of departure, and approaches issues of economic growth and development through a rights-based lens that ensures the respect, protection and promotion of fundamental rights.
 - 39.2. That the Discussion Paper expressly recognises that universal access to the internet is essential for economic growth and development, as well as for the full realisation of fundamental rights in the country.
 - 39.3. That the Discussion Paper highlights the findings of the Competition Commission in respect of the telecommunications sector being anti-poor, and makes appropriate recommendations to ensure that universal access to the internet is attainable by all sectors of the population, particularly vulnerable and marginalised communities.
 - 39.4. That the Discussion Paper puts forward the 7-point plan, outlined above, as a model that can be followed to achieve universal access to the internet.
 - 39.5. That the Discussion Paper explicitly calls on the relevant stakeholders to address the shortcomings in spectrum allocation and digital migration.
 - 39.6. That the Discussion Paper highlights the need for regulatory certainty and better coordination amongst relevant stakeholders in respect of the telecommunications sector, and endorses the proposal for the establishment of an ISC on Internet Governance to ensure that the benefits of the internet and other ICTs can be harnessed for meaningful and broad-based economic growth and development.

- 39.7. That the Discussion Paper be expanded to include reference to the SABC and the need to ensure that it is properly resourced, with its independence safeguarded, to enable it to perform its role as the public broadcaster.
40. Please note that MMA is also available to make oral submissions to the Ministry, should there be an opportunity to do so. Please do not hesitate to contact us should you require any further information.

Media Monitoring Africa
13 September 2019