

Tuesday, 10 July 2018

ATTENTION:

The Honourable Minister Dr. Bonginkosi Emmanuel Nzimande
National Department of Transport

Mrs Mmathapelo Sako
Private Secretary to the Minister
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RE: High Cube Containers

‘The Voice of Business in the Cape’

The Cape Chamber of Commerce & Industry serves more than 2 000 businesses in the Western Cape, allowing them access to a credible network that adds exceptional value. With a wide range of products and services, the Chamber assists these businesses, offering them the opportunity to excel. As a non-partisan organization our submissions are the crucial voice of business.

High Cube Containers

The Cape Chamber of Commerce and Industry is extremely concerned about the prohibition of the use of standard High Cube containers on standard trailers which is due to come into effect on January 1, 2019. At this stage it appears that we face chaos, damage to our vital export industries and possible international incidents.

The original concern with the containers was that because they were higher than the old ones there could be a problem with unstable loads, especially in cross winds. However, these containers have been in use for more than seven years and we are unaware of any incidents or accidents involving unstable loads in the new containers. It would therefore seem that there is no justification for the original fears.

The second problem is the high cost of the conversion to low bed trailer as recommended by the Department of Transport. The cost per trailer is estimated at about R300 000. Many of the companies which transport the containers of export fruit are small businesses run by the previously disadvantaged and operate just two or three trucks.



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They simply cannot afford the conversion costs and recovering them from an agricultural industry that has just experienced the worst drought in more than 100 years will not be possible. In addition, packing sheds and loading facilities have been designed for standard trailers and converting them to serve low-bed trailers is another high cost that drought-stricken farmers cannot afford.

A further problem is that it is not practically possible to convert all the trailers in the remaining few months before implementation date. If the regulation is strictly enforced there will be chaos on our roads with queues of trucks several kilometres long.

We would also point out the high cube containers on standard trailers are perfectly legal in our neighbouring countries and if these trucks are stopped at our borders we could have international incidents and relations between South Africa and its neighbouring countries could be soured. It is also likely that our neighbours will choose to export through Namibia and Mozambique, denying our ports much needed revenue.

The solution to the problem is to grant an exception to the height regulations for high cube containers in exactly the same way as exceptions have already been granted for car carriers and double decker buses. These vehicles are even higher/taller than the high cube containers on standard trailers. This would be a “no cost” solution for all.

The Chamber strongly believes that the safety of high cube containers on standard trailers has been demonstrated over the last seven years and there is no reason why they should not be granted an exemption from the maximum height regulations.

Conclusion

We request that the Department of Transport consider our submission, in a positive light – thereby ensuring the growth of our local and national economy.

Yours faithfully

Ms Janine Myburgh
President: Cape Chamber of Commerce and Industry

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