

QCTO Engagement Sample Letter:

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QCTO

256 Glyn Street, Hatfield, Pretoria, 0083

Attention: Mr. Thomas Lata

Cc: Mr. Vijayen Naidoo / CEO QCTO

12 July 2024

Dear Sir(s),

Re: Gazette: 50742 & The 5th June 2024 QCTO Directive on Implementation of Transitional Arrangements

It is with grave concern as a stakeholder that we raise these matters as the TETA ETQA cannot provide stakeholders with any direction or reassuring answer with regards to the below items, we are forced to plead that you afford them your urgent attention.

Our sincere view is that the impact of a lack of direction and failure to successfully complete the finalisation process, impacts on the ability to train learners towards equipping them with job relevant skills. This not only has impact on the rate of unemployment in our country, quality of the SA workforce, it places , organisations' regulatory and compliance at risk – as mere examples with respect to the Department of Employment and Labour inspections, as well as the contravention of the Road Traffic Act with regards to the transportation of dangerous goods by road – this is just a glimpse from a broad single sector view, a sector that moves South Africa,, as sector on which other parts of the economy rely.

Industry players believe this matter is so critical that it should concern the newly appointed Minister of Higher Education and Training, Ms. Nobuhle Nkabane. It would be remiss of any corporate citizen not to highlight that your office has the

duty to draw the attention of the minister for her urgent intervention in this critical matter. Industry certainly would feel the need to do so should you not.

The following lists of qualifications, part qualifications and skills programmes expired on 30 June 2024 for learner registration – this is just Transport Road Freight related only. Most of these programmes are linked to compliance and regulatory requirements within, but not limited to, the Road Transport, Express Logistics and Logistics Industries.

1. Legacy Qualification that has reached the end date and has been re-registered as a qualification for learner enrolment, but the unit standards have not been extended for registration.

ID 64829: National Certificate: Lifting Machine Operations: Last day of enrolment 30 June 2026

Unit standards in this qualification that need to be extended for learner enrolment to 30 June 2026:

- US 116231 - Operate a cab controlled overhead crane
- US 116524 - Operate a Mobile crane
- US 243272 - Operate a Mobile Elevating Work Platform (MEWP)
- US 116235 - Operate a pendant controlled Overhead crane
- US 116075 - Operate a Side boom
- US 116255 - Operate a Tower crane
- US 116253 - Operate a Truck Mounted Loader crane
- US 110151 - Operate a Working Platform
- US 242981 - Operate Defined purpose Lift trucks
- US 242976 - Operate Overhead / Gantry cranes
- US 260798 - Operate a Cantilever container crane (ship to shore)
- US 260777 - Operate a Container side loader
- US 260818 - Operate a Counter-balanced lift truck in excess of 15 tons
- US 260763 - Operate a floating crane
- US 260760 - Operate an inland Container crane (rail mounted)
- US 260761 - Operate a Reach stacker

US 260765 - Operate a Rubber tyred gantry crane
US 260817 - Operate a scotch derrick crane (ship mounted)
US 260764 - Operate a Ships crane
US 260797 - Operate a Side loader lift truck
US 260757 - Operate a Straddle carrier
US 260780 - Operate a Sugar cane crane
US 260781 - Operate a Telescopic boom handler
US 260758 - Operate a Wall-mounted jib
US 260759 - Operate a Wharf side crane (rail mounted)
US 260838 - Operate a Wharf side jib crane
US 242972 - Operate Advanced defined purpose lift trucks
US 242974 - Operate Counter-balanced lift truck
US 242982 - Operate Heavy crane
US 260762 - Operate Rough terrain/earthmoving/agricultural equipment
US 123260 - Operate Tailgates and tail-lifts
US 242978 - Operate Truck-mounted cranes

Industry is aware that some of the above Unit Standards have a QCTO Skills program emanating from them.

The concern is that the QCTO skills programmes have a value of 40 credits and more. This creates a real challenge for licensing and / or re-licensing of operators.

- The learner is expected to be in training for an extended time which would be 2 weeks, irrespective of licensing or re-licensing.

We believe that the good intentions of the new QCTO landscape are soured by the lack of consideration of the practical industry implications in the prevailing management of the transitional period – we plead for you to review the transitional plan.

2. Legacy qualification reference SAQA ID 50285 National Certificate: Professional Driving NQF 3

Qualification **ID 50285 was not extended for learner enrolment**. It is imperative that it be extended until June 2027 in order to align with the practical

requirement (and reality) to enable the QCTO and SAQA processes to run their time.

- This suggested date is in line with the realistic time that it takes to finalise its replacement qualification, **which has been developed and submitted to the QCTO.**
- It is industry's /our experience that once a qualification has been registered with SAQA, it then returns to the QCTO for its registration process, then only at that stage can an SDP start developing material for this qualification. This on average can take up to 7 months – therefore we anticipate this would take the process to mid-2025.
- In our experience, once the SDP has submitted its training material to the QCTO, the process takes another 12 months before the SDP is accredited for this qualification - which means that the SDP will only be accredited by mid-2026, hence our suggested date of 30 June 2027.

Therefore, we recommend that ID 50285 National Certificate: Professional Driving be extended in totality with all its Unit Standards until 30 June 2027. It is important that as work and learning happens in the industry that concerns be taken seriously.

3. Occupational Certificate ID 93793: Occupational Certificate: Truck Driver NQF 3

This occupational certificate that has also expired, has been rejected outright by the industry as replacement for ID 50285.

- A replacement truck driver qualification has been developed and submitted to the QCTO and the industry is unaware of any further progress on its registration status.

4. Legacy Qualifications not replaced by Occupational Qualifications or OC not registrations not yet finalised.

TETA ETQA have advised industry that the Stock Clerk NQ 2 OC is a replacement for ID 53900 General Education and Training Certificate: Transport NQF 1. This however is incorrect as the GETC 53900 was a generic qualification cutting across

the 8 sub-sectors within the Transport Sector, providing learners with insights on all aspects of the Transport Sector.

- The Stock Clerk qualification is only relevant to one of the occupations within the general sector.

We recommend that the qualification and all the unit standards linked to the qualification are re-registered in line with other extended learner registrations in the sector.

5. ID 57831 National Certificate: Freight Handling NQF 3 replaced by OC 96396 - Occupational Certificate: Freight Handler NQF 3

The OC 96396 has also expired for learner registration up to 30 June 2024. We require ID 57831 - National Certificate: Freight Handling NQF 3 to be extended with all its unit standards within this qualification.

6. ID 59365 - National Certificate: Freight Forwarding and Customs Compliance NQF 3

There has been no development of a replacement occupational qualification at this level. The NQF 3 qualification's objective is to set a foundation for the compliance of the Customs Act.

7. ID 59298 - Further Education and Training Certificate: Freight Forwarding and Customs Compliance NQF 4

As per ID 59365 although the objectives for qualification ID 59298 is to further develop the learner's skills and knowledge within customs and the framing of entries to an intermediate level.

- The TETA ETQA has designed the National Occupational Certificate: International Trade Administrator NQF 4 as a replacement for both NQF 3 and NQF 4 although this is not sufficient for new entrants into this occupation.

8. ID 48439 - Further Education and Training Certificate: Road Transport Supervision NQF 4

This legacy qualification which was replaced by ID 94025 - Occupational Certificate: Transport Clerk NQF 4, has now also expired for learner enrolments as at 30 June 2024.

- There is currently no replacement for this qualification.

It is our recommendation that ID 48439 and all its unit standards plus ID 94025 be extended for learner registration at least until June 2026.

9. ID 48437 National Certificate: Road Transport NQF 3

In the absence of an occupational qualification, it is our recommendation that ID 48437 and all its unit standards be extended for learner registration at least until June 2026.

10. ID 61489 National Certificate: Transport Operations NQF 5

In the absence of an occupational qualification, it is our recommendation that ID 48437 be extended for learner registration at least until June 2026.

11. Occupational Qualifications expired 30 June 2024 that need to be extended as they are not replaced

Below is a list of occupational certificates that require extension to June 2026 as there has been no realignment of these qualifications.

- OC 94202 OC Bus Driver
- OC 96393 OC Freight Handler
- OC 96371 OC Road Transport Manager

In conclusion, I must state it is in the earnest interest to further an inclusive education system and to ensure continuity of the transformative impact that a broad spectrum of qualification to cater for the diversity of respective sectors as well as the diverse levels of the South African citizenry – the plight of our country's unique youth rich profile amidst the broadly marginalising

unemployment rate, that I urge you and the minister to take deep reflections on how to achieve a transitional step approach to the journey for the QCTO.

At this point I would like to highlight another general concern relating to participation:

Lower-level qualifications (such as NQF1s NQF2s and NQF3s) have been the salvation for the marginalised citizens affording them through learnerships (whose entry level requirements are attainable) to enter the workplace, or to continue and have a baseline to progress to higher level qualifications. Should QCTO ignore the fact that South Africa still has a lot of young people coming out of school without a matric/NQF4 level certificate/qualification; and if the option to facilitate access to entry level opportunities in the workplace should be future reality, our crises hinged on unemployment will continue to plague and stifle this economy.

Yours faithfully,

CEO/Chairman