

From: Iqshaan Alladin
Sent: Tuesday, 29 January 2019 12:12 PM
To: Lumkile Qabaka
Cc: Victor Molefe
Subject: Comments re gg42108

Hi L. Qabaka

My comments are as follows:

- 1.) The proposed conformity assessment framework must comply with the WTO/ TBT agreement. In particular, ICASA partnerships should be made with other non-commercial conformity assessment bodies (in particular other regulators), and not profit making entities who compete with other such entities.
- 2.) Test lab partnerships should (as per above point) also be made and managed impartially, without certain test labs "approving"/ "accrediting" other competitor test labs.
- 3.) The SANAS/ ILAC acts and agreements must be respected and advanced. SANAS should also be partnered with.
- 4.) SDoC may pose serious risks due to bias potentials, and these must be determined in lieu of our markets maturity levels. Ideally 3rd party testing is most effective.
- 5.) Alignment with product safety regulators eg. NRCS are critical.
- 6.) This new proposed framework must also aim at eliminating duplication of regulatory approvals eg. NRCS and ICASA when the same technical regulations is in reference. This will ensure that our market realizes time and cost efficiencies.
- 7.) A comprehensive regulatory impact study should be performed for this and all future regulations. In particular product risk must be determined and balanced against other factors, eg. economic factors.
- 8.) Mutual recognition agreements with other Communication regulators in SADC and Africa or beyond must be advanced. This will ensure easier movement of goods intra-Africa and facilitate global trade.

Should you hold any public consultative forums, please invite us.

regards

Iqshaan Alladin 

Product Regulations and Safety & Consumer Protection Manager (SME)



Massmart Holdings, 16 Peltier Drive, Sunninghill Ext. 6, Sandton 2157 