A bee flying on a flower

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# Abbreviations and Acronyms

|  |  |
| --- | --- |
| AIS | Alien and Invasive Species |
| AUDSEWPC | Australian Department of Sustainability, Environment, Water, Population and Communities |
| BA | Basic Assessment |
| BABS | Bioprospecting Access and Benefit Sharing |
| B-BBEE | Broad-based Black Economic Empowerment |
| BIOFIN | Biodiversity Finance Initiative |
| CapeNature | Western Cape Nature Conservation Board |
| CITES | Convention on International Trade in Endangered Species of Wild Fauna and Flora |
| CVM | Contingent Valuation Method |
| DESTEA | Free State Department of Economics, Small Business Development, Tourism and Environmental Affairs |
| DAFF | Department of Agriculture, Forestry and Fisheries (former DFFE ex Agriculture) |
| DEA | Department of Environmental Affairs (former DFFE) |
| DEDEA | Eastern Cape Department of Economic Development, Environmental Affairs and Tourism |
| DENC | Northern Cape Department of Environment and Nature Conservation |
| DFFE | Department of Forestry, Fisheries and the Environment |
| DoT | Department of Transport |
| DPA | Department of Public Administration |
| EIA | Environmental Impact Assessment |
| EKZNW | Ezemvelo KwaZulu-Natal Wildlife |
| EPBC | Australian Environment Protection and Biodiversity Conservation Act |
| GDARD | Gauteng Department of Agriculture and Rural Development |
| HR | Human Resources |
| IT | Information Technology |
| LEDET | Limpopo Department of Economic Development, Environment and Tourism |
| MLRA | Marine Living Resources Act |
| MTPA | Mpumalanga Tourism and Parks Agency |
| MPI | New Zealand Ministry of Primary Industries |
| NEMBA | National Environment Management: Biodiversity Act |
| NEMWA | National Environmental Management: Waste Act |
| PDG | Palmer Development Group |
| PFMA | Public Finance Management Act |
| PPP | Purchasing Power Parity |
| READ | North-West Department of Rural, Environmental and Agricultural Development |
| RIS | Regulatory Impact Statement |
| S&EIR | Scoping and Environmental Impact Report |
| SAMSA | South African Maritime Safety Authority |
| SANParks | South African National Parks |
| TOPS | Threatened or Protected Species |
| UNDP | United Nations Development Programme |
| VGDSE | Victorian Government Department of Sustainability and Environment |

# Introduction

The Department of Forestry, Fisheries and the Environment (DFFE) and the provincial issuing authorities administer several different permits and licences under National Environment Management: Biodiversity Act (NEMBA) 2004 and provincial legislation dealing with biodiversity conservation and wildlife management. The Biodiversity Finance Initiative (BIOFIN) is a global project implemented by the United Nations Development Programme (UNDP). In South Africa, BIOFIN is implemented by the UNDP in partnership with the DFFE.

Part of the BIOFIN programme of work is focused on improving the effectiveness of fees for permits and licenses. These include fees for permits and licences for national Threatened or Protected Species (TOPS), Bioprospecting Access and Benefit Sharing (BABS), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and Alien and Invasive Species (AIS) regulations. They also include fees for permits and licences issued in term of provincial conservation legislation which include fees for hunting and fishing in inland waters.

One of the implementation challenges in relation to permits and licences is the lack of a mechanism to adjust these fees and limited capacity in terms of fee setting and periodic review. Determining appropriate fee amounts is seldom straightforward and is an important element in the success of the overall regulatory framework around permits and licences. Fees can influence the behaviour of applicants and the relationship that applicants have with regulators. They are also directly linked to the revenue that government receives which can cover part of the costs of implementation biodiversity regulations.

This Summary Findings and Policy Brief Report provides a summary of the programme of work on fees for permits and licences. It draws on the three deliverables of the project which are:

The following section focuses on baseline information followed by data and analysis relevant to fee determination including inflation adjustments, benchmarking and permit processing costs. The revenue potential of increased fees is then discussed before turning to the Fee Determination Framework. Finally, issues pertaining to the potential standardization of permits and licences and their associated fees are briefly discussed.

# The permit and licence fees baseline

The wider legislative context along with the national and provincial systems of licences and permits both ultimately influence current permit fees and future possibilities for fees. Current challenges in legislation and permits systems are substantial. They have been considered at length as part of the 2020 High-Level Panel of Experts for the Review of Policies, Legislation and Practices on Matters of Elephant, Lion, Leopard and Rhinoceros Management, Breeding, Hunting, Trade and Handling. Among other things, the High-Level Panel found that (HLP, 2020: 294):

* “The concurrent legislative mandate has resulted in a plethora of conservation / biodiversity related legislation.
* In some instances, the provincial legislation is dated having been promulgated pre-Constitution.
* Reviews and assessments of provincial and national legislation have found examples of the legislative provisions being fragmented, inconsistent and in some instances conflicting.
* The current 9+1 system creates division between provincial conservation authorities and national as well as duplication and confusion amongst clients – it is inefficient.”

In terms of permit types, most provinces issue between 30 and 60 different permits and licences under NEMBA. Those that charge hunting permits per individual animal tend to have substantially longer fee lists, for example, reaching over 150 fee types in the case of Limpopo. Provinces have developed their own unique differentiated permit types, names and fee structures guided by their own specific legislation and preferences. A review of these identified over 15 obvious and more subtle ways in which permits vary to different degrees between provinces with the most important ones including the scale of activity (usually the number of individuals or species involved), timeframe of validity (incl. once-off fees, temporary fees, annual fees, multi-year fees) and species type (e.g. endangered vs protected vs ordinary species).

The limited standardisation of fee types and amounts makes comparisons difficult. Nevertheless, general biodiversity-related, biodiversity-trade related and CITES permit fees per province were equalized and are summarised in Table 2.1. Comparisons shows that some currently applicable fee amounts are relatively similar between provinces while some differ by a factor of 10 or more.

Table 2.1 Provincial fees for selected general biodiversity-related, biodiversity trade-related and CITES permits



Similar variability in fee application and amounts between provinces apply to hunting and fishing permit and licence fees summarised in Table 2.2. Note that some fees have not be adjusted for inflation the implications of which are assessed further in Section 3.

Table 2.2 Provincial fees for selected hunting and fishing permits and licences



The number of permits issued by all issuing authorities is shown in Table 2‑3. For 2019, the most recent pre-COVID year, a total of 47,968 permits were issued which is similar to the year before that. Almost 99% of these permits were issued by the provincial issuing authorities.[[1]](#footnote-2)

Table 2‑3: Number of permits issued by all issuing authorities, 2016 - 2020

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Issuing Authority** | **2016** | **2017** | **2018** | **2019** | **2020** |
| **National - DFFE** |  |  |  |  |  |
| TOPS | 65 | 72 | 76 | 106 | 103 |
| CITES |  | 611 | 105 | 44 |  |
| TOPS and CITES Marine |  | 32 | 36 | 45 | 18 |
| AIS | 294 | 425 | 431 | 465 | 366 |
| BABS | 9 | 12 | 37 | 13 | 18 |
| ***Sub-total*** | ***368*** | ***1 152*** | ***685*** | ***673*** | ***505*** |
| **Provinces** |  |  |  |  |  |
| Western Cape |  |  | 4 886 | 4 790 | 3 485 |
| Kwa-Zulu Natal | 4 632 | 4 606 | 4 669 | 4 115 | 3 032 |
| Mpumalanga | 4 658 | 4 349 | 4 179 | 5 088 | 4 986 |
| Northern Cape | 2 993 | 2 731 | 2 348 | 1 958 | 1 847 |
| Eastern Cape | 10 858 | 9 519 |  |  |  |
| Gauteng | 10 598 | 11 273 | 14 410 | 12 988 | 12 139 |
| Free State |  | 3 197 | 2 660 | 1 764 | 3 273 |
| North West |  |  | 3 366 | 5 592 | 7 123 |
| Limpopo | 13 821 | 12 745 | 13 108 | 11 000 | 7 080 |
| ***Sub-total*** | ***36 702*** | ***38 901*** | ***49 626*** | ***47 295*** | ***42 965*** |
| **Total (nat & prov)** | **37 070** | **40 053** | **50 311** | **47 968** | **43 470** |

Revenues from permit and licence fees are contrasted with budget allocations to licencing and permitting units or divisions within issuing authorities in Figure 2.1.[[2]](#footnote-3) At the national level, budget allocations to permitting and licensing functions have increased from R5.4 million in 2017/18 to R13 million in 2019/20. Conversely, the sum of provincial budgets has decreased from R73 million in 2017/18 to R61 million in 2019/20. For 2018/19, total revenues amounted to R16 million (85–90% of which were generated by the provincial issuing authorities) and decreased to R13 million in 2019/20.

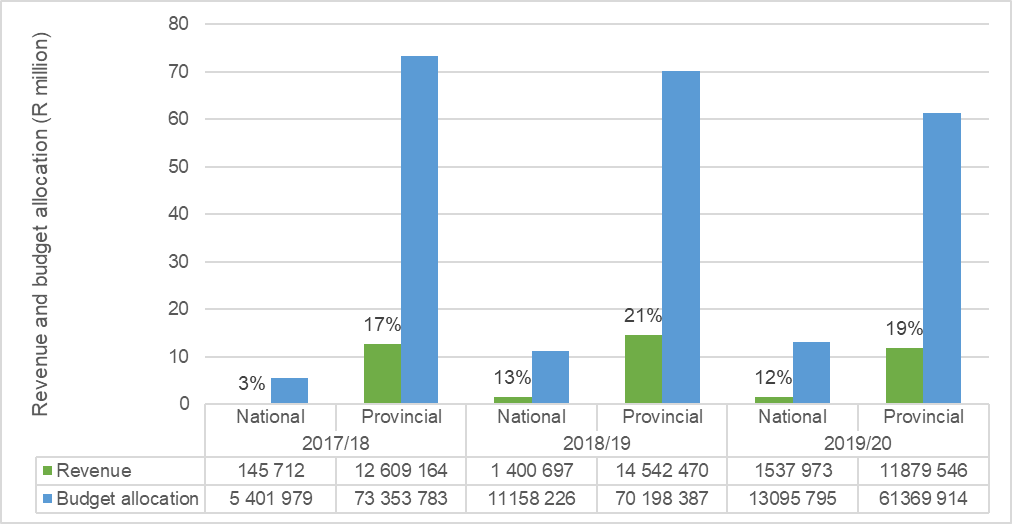


Figure 2.1 Revenues from permits and licences as a proportion of budget allocations to the permits and licensing functions

Notwithstanding data constraints, it is clear that the costs of administering the entire national and provincial permits and licences system are orders of magnitude higher than fee revenues from permits and licences. When using reasonable assumptions in response to data constraints, total national and provincial revenue from permits and licence fees tend to be between 12% and 18% of budgets allocated to issuing authorities. Among the provinces, the Western Cape is the only province where fee revenues exceed budget allocations for permitting and licencing functions by a slight margin.

Revenue retention for use in biodiversity management is partial. Only the provincial issuing authorities of the Western Cape, KZN and Mpumalanga are able to retain revenue from fees by virtue of their status as parastatal ‘Boards.’ This should provide an advantage in fee setting as applicants (customers) are generally more supportive of permit fee increases if they know that their fees will be retained for the provision of permitting services. The other provincial and national issuing authorities are not able to retain revenue as it flows to the general fiscus.

# Data and analysis and to assist in fee determination

Fee review and determination should be informed by key data and analysis. This includes understanding the implications of adjustments for inflation, benchmarking data and estimates of the processing costs associated with permit and licences each of which is outlined below.

## Adjusting fees for inflation

At a minimum, fees should keep pace with inflation. Some permit and licence fees were set several years ago and have therefore not kept up with inflation while others are updated yearly. Table 3.1 shows where fees have not been adjusted in the last three year and provides the overall percentages by which fees would need to be increased to adjust them for inflation using national consumer price index (CPI) data. National TOPS fees would need to increase by 113% while CITES fees would need to increase by 71%. Most provinces update the fees associated with their legislation regularly although Mpumalanga would require a 221% increase to some of its fees to adjust for inflation and the Eastern Cape would need to increase their hunting fees from 1984 by 1,416%.

Table 3.1: Percentage increases in permit and licence fees required to adjust for inflation for issuing authorities that have not adjusted their fees in the last three years

|  |  |  |
| --- | --- | --- |
| **Issuing Authority** | **Year of last fee adjustment** | **Increase needed to account for inflation** |
| **National - DFFE** |  |  |
| TOPS | 2007 | 113% |
| CITES | 2010 | 71% |
| TOPS Marine - Ordinary Permits | 2007 | 113% |
| TOPS Marine - whale watching, shark cage diving | 2010 | 71% |
| AIS | 2014 | 37% |
| BABS | 2015 | 31% |
| **Provinces** |  |  |
| Western Cape | Adjusted in last three years | |
| Kwa-Zulu Natal | 2018 | 12% |
| Mpumalanga | 1999 | 221% |
| Northern Cape | Adjusted in last three years | |
| Eastern Cape | 1984 | 1416% |
| Gauteng | Adjusted in last three years | |
| Free State | Adjusted in last three years | |
| North West | Adjusted in last three years | |
| Limpopo | Adjusted in last three years | |

The increased revenue implications of adjusting fees for inflation are assessed in Section 5. Although provincial issuing authorities can determine their own fees, they are often heavily influenced by national fees. For example, when justifying an increase to their TOPS fee, the issuing authority in Gauteng was told by their provincial Treasury that their current TOPS fee of R88 was already high compared to the national fee of R50 and that it should therefore remain unchanged. The importance of regularly updating national fees is clear.

## Benchmarking and comparing fees

International benchmarking focused on comparisons of considerations or criteria used for setting fees and fee amounts. Data was gathered from the following countries: Botswana, Namibia, Mozambique, Zambia, Tanzania, Kenya, Rwanda, Australia, New Zealand, Canada, United States, Malaysia, Mexico, Estonia, Singapore and Vietnam. Fees in other countries were converted to Rands using Purchasing Power Parity (PPP) exchange rates and compared to currently applicable South African national fees and/or average fees across provinces. Note that comparisons between different countries need to be treated with care. There are often significant differences in the structure of government agencies and responsibilities between countries which impact on fees. Each country also has their own priorities and system which guide services emphasis and levels of effort all of which make comparisons of fee amounts difficult.

***TOPS***

For TOPS, all but one of South Africa’s current fees are substantially lower than the average of the countries considered. For example, international import/export permit fees in South Africa are 90% lower than the average for the countries included. Only permit fees for the registration of a hunting/game farm were higher in South African relative to Namibia.

Table 3.2 Benchmarked TOPS terrestrial permit fees per year converted to Rand using PPP exchange rates and compared to South African fees and permit processing costs

A picture containing application

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***CITES***

The 2021 draft amended fee proposed for a CITES permit without annexure in South Africa will be very slightly lower (8%) than the average international fee, while the ‘with annexure’ permit fee is 47% higher than the average international fee given that benchmarked countries charge the same with and without annexure.

Table 3.3 Benchmarked CITES terrestrial permit fees per year converted to Rand using PPP exchange rates



***Whale watching and white shark cage diving***

The South African CITES and TOPS terrestrial permit types and fees apply to similar activities for marine permits which was also found to be the case in other countries. However, they also apply to boat-based whale watching and white shark cage diving which are essentially tourism activities therefore differing markedly from the other fee types under NEMBA.

For boat-based whale watching, South Africa has similar currently applicable fees to the international average for small boats with 5 passengers or less, but fees are several orders of magnitude above the international average for medium and especially larger boats.

Table 3.4: Benchmarked international boat-based whale watching permit fees per year converted to Rand using PPP exchange rates



For white shark cage diving, fees in South Africa are more than 85% less than the international average which indicates that per diver fees used internationally seem to have the potential to result in higher revenues. They also have an advantage of ensuring that operators do not have to pay permit fees when diver numbers are down for reasons beyond the control of operators such as during the COVID-19 pandemic. Disadvantages include the need to monitor and verify diver numbers which comes at a cost.

Table 3.5 Benchmarked international white shark cage diving permit fees per year converted to Rand using PPP exchange rates



***BABS***

Fees are highly variable with Rwanda, India and Malaysia charging lower fees for citizens relative to foreigners and most countries offering much lower fees for non-commercial research. For citizens, current South African fees are relatively comparable to international fees although they are higher than international averages for higher turnover entities and lower for low turnover entities (which is an expected outcome given the structure of South African fees). For non-citizens, fees for entities with a turnover exceeding R750,000 will apply (i.e. foreign bioprospecting companies almost certainly will have a turnover above this amount) and South African fees for this category are roughly double the international average although they are lower than Kenyan fees.

Table 3.6: Benchmarked international bioprospecting permit fees converted to Rand using PPP exchange rates

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***AIS***

Fee amounts specifically for biosecurity-related permits were sourced for New Zealand and Australia which are substantially more nuanced/complex when compared with the South African fee structure. Fees in South Africa are 84% less than the international average even after adjustment for inflation. In addition, South African permits are valid up to 10 years whereas permits in Queensland, for example, are valid for up to 3 years.

Table 3.7 Benchmarked international AIS permit fees converted to Rand using PPP exchange rates



***Hunting and fishing***

Hunting permit and licence fees are particularly difficult to benchmark between countries given different legislative frameworks and approaches to regulation. In South African, landowners essentially have ownership over game as opposed to other countries such as Kenya, Tanzania and Mozambique where the state has ownership or ‘sovereign right’ over the majority of wildlife.

For citizens, South Africa has somewhat lower general hunting licence fees (30% below the international average), higher hunting guide / outfitter licence fees (37% above the international average) and substantially lower professional hunter licence fees (82% below the international average without adjusting for inflation). These differences are accentuated when South African fees are compared to the non-citizen fees charged by some other countries.

Table 3.8 Benchmarked international hunting licence fees converted to Rand using PPP exchange rates



Hunting fees per animal are less commonly charged than fees per hunter. Benchmarking focused on Namibia and Botswana given the similarity of species hunted there and limited clearly comparable data from elsewhere. The average for South Africa is between 35% and 76% lower for than for Namibia and Botswana. However, the R5,300 fee charged for rhino, lion and leopard hunting is higher than for Namibia and Botswana albeit not for non-citizen hunters that are charged three to four times more in Botswana.

Table 3.9 Benchmarked international per animal hunting permit fees converted to Rand using PPP exchange rates



South Africa has the lowest average fee for recreational fishing at 68% below the average for the benchmarked countries without inflation adjustments but reduced to 34% below with inflation adjustments. The higher fees charged for non-citizens in Botswana and Ontario accentuate these differences further.

Table 3.10: Benchmarked international recreational fishing fees converted to Rand using PPP exchange rates



## Permit and licence processing costs

Issuing authorities incur costs to provide permitting and licensing services. These costs have to be funded by direct permit fees and/or through funding from the general fiscus (i.e. ultimately from taxpayers in general). In either case, it is important to understand and estimate the cost of the permitting and licensing services provided for the average individual permit per permit type. Data on key permit and licence processing was requested from each issuing authority to inform processing cost estimation. This included data on staff time spent on permit processing for each staff salary level, kilometres travelled as part of permit processing and other relevant costs.

A summary of the permit processing costs relative to fees charged for individual permits issued at the national level is provided in Table 3.11. Of all the permits issued at the national level, only one has a corresponding fee that is higher than its associated processing cost, namely the CITES import permit specifically issued by the CITES Marine issuing authority. For all other permit types, the fees charged are lower than the processing costs – in many cases they are equivalent to less than 1% of processing costs.

Table 3.11 Processing costs relative to permit fees charged for individual permits issued at the national issuing authorities



For the provinces, sometime extremely high levels of variation were found in the processing costs associated with the same or similar permits. For example, data from issuing authorities indicated that processing a permit to pick or collect plants has an associated cost of R309 in Gauteng, R1,425 in the Eastern Cape, R4,377 in KwaZulu-Natal, R52,728 in Limpopo, and R64,509 in the Northern Cape (Appendix 2 provides more detailed examples of processing cost estimates per province). While variability is to be expected, the extreme variability of permit processing cost estimates between provinces are a concern and more accurate estimation are likely to be needed if they are to be used in fee determination. Table 3.12 provides a summary of average processing costs across all provinces relative to average fees charged for individual permits.

Table 3.12 Processing costs relative to permit fees charged for individual permits issued by the provincial issuing authorities



# The fee determination framework and process

The purpose of the Fee Determination Framework is to provide broad guidance for the appropriate determination or setting of fees for permits and licences under NEMBA whether they are being newly determined or revised. It is guided by legal requirements with regard to government financial management, lessons from fees applicable in other parts of the wider conservation and environmental sector along with international best practice.

At the level of basic principles, South African fees should aim to achieve an optimal balance between efficiency, equity and simplicity elaborated in Figure 4.1.

Figure 4.1: Overall principles to be applied in fee determination for fees under NEMBA

These principles inform the key considerations to guide fee determination. The distinction should be made between considerations that should always be used to guide fee determination and those that can sometimes be used.

The following considerations **should always be used** to guide fee determination for all permit or licence types:

1. Fees should recover all or part of the cost of the permitting and licensing services provided by the issuing authorities.
2. Fees should be affordable and equitable.

The following considerations **can sometimes also be used** to guide fee determination for some permit types:

1. Fees can capture the value of resources where their ownership by the state is clear or there is a clear justification to do so.
2. Fee can be used to further specific policy objectives.

Cost recovery, affordability and equity are thus always relevant and are generally easier to measure, understand, justify and apply. They are substantially more commonly used internationally. The merits of using other considerations should be very carefully weighed up whether they can be measured and updated without complex analysis or expert inputs. The Fee Determination Framework provides more details on the application of the four considerations.

The fee determination model or process can best be described as ‘cost recovery with potential adjustments for affordability, equity, value and policy objectives’. Figure 4.1 shows how the four considerations can be applied sequentially to arrive at appropriate fee amounts bearing in mind that not all considerations will be applicable. The same process can be applied to the periodic review and revision of fee amounts. Stakeholder engagement is case specific. It will generally, at a minimum, require a chance for stakeholders to comment on draft fees before they can be finalized. In instances where significant changes to fee amounts or structures are being proposed, additional stakeholder engagement is likely to be necessary in keeping with government requirements. In such cases, stakeholders are likely to be particularly interested in any efficiency improvements or other cost cutting measures that are being implemented by issuing authorities to keep permit processing costs as low as possible.

Always applicable

Stakeholder engagement, refinement

Sometimes applicable

Figure 4.1: Fee determination model or process

Fees for licences and permits under NEMBA are a source of government revenue. As such, fee determination, collection and adjustment are governed by the Public Finance Management Act (PFMA) of 1999 as amended and its associated Treasury Regulations. The PFMA is clear that accounting officers are required to annually review fees, appropriate adjust them if needed, gain approval from the relevant national or provincial Treasury, and publish them in the Government Gazette (generally using a simple and brief Notice in the relevant Gazette that focuses on providing the recommended amended fees and inviting stakeholder comment thereby avoiding the need to amend entire Regulations). The Analysis Report found that provincial issuing authorities that regularly review and adjust their fees do not seem to have significant constraints in meeting these requirements. Annual reviews are ideal and at a minimum they should revise fees to reflect inflation as is done by the majority of provincial issuing authorities. Where they are allowed for, bi-annual revisions are also an option that can reduce the administrative burden of the revision process even if there may be a slight loss in revenue.

# Revenue potential from adjusting fees

Predicting increased revenue from fees is difficult prior to the application of the Fee Determination Framework to determine appropriate adjusted fees. Nevertheless, simply applying inflationary adjustments would result in increased revenues of approximately R7.5 million representing a 50% gain relative to the pre-COVID revenue baseline (the average between 2018/19 and 2019/20) of R14.7 million (Figure 5.1).

Chart, waterfall chart

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Figure 5.1: Additional provincial and national revenue potential from fee adjustments for inflation relative to current revenue

This increase in revenue is a likely minimum as benchmarking results indicate potential for fee increases beyond inflation in certain instances. At the risk of generalising, national fees for TOPS and AIS permits are particularly low relative to those in other countries. Fees for CITES (in the Draft CITES Regulations), boat-based whale watching, white shark cage diving, BABS and hunting generally compare better with those in other countries.

As discussed, only the provincial issuing authorities of the Western Cape, KZN and Mpumalanga will be able to retain increased revenue from fees by virtue of their status as parastatal ‘boards.’ The other provincial and national issuing authorities are not able to retain revenue which then flows to the general fiscus. Increased revenue would therefore be of less direct benefit to these issuing authorities. However, showing that they are making efforts to optimise revenues should assist them when motivating for budget allocations.

# Standardization of fees

Calls for a more standardized approach to permits and licences have been made both within government and by stakeholders, primarily applicants wanting to avoid the frustrations and costs associated with different fee types, application processes and amounts between provinces. There seems to be general consensus that current systems are too complex and costly. Although this project focuses on fee amount determination, some comments are possible to assist discussions around standardisation.

Given its wide-ranging implications, standardisation would first require an in-principle willingness among the provinces to pursue it. This may be difficult to achieve for political reasons and would, for example, probably require assurances that provincial fees revenues will not decrease as a result of standardisation. Stakeholders have commented that it may even be worth considering a complete system overhaul whereby the issuing of permits and licences is undertaken entirely by national DFFE and not the provinces.

If it is to be pursued, standardisation of fee amounts would have to be preceded by other forms of standardisation or alignment. These would need to include uniform provincial legislation, a more uniform approach to some permits particularly hunting, rationalisation and alignment of permit types and names, alignment of permit validity periods, alignment of permitting protocols or work processes, etc. Standardised fee amounts therefore become relevant only once other forms of standardisation have been dealt with.

There is no inherent reason why standardised fee amounts cannot be determined as part of an overall process of standardisation. However, current permit fee amounts and permit processing costs vary by several orders of magnitude between provinces which will make standardising more challenging.

# Conclusions

The permitting and licensing system entails a significant cost to government and appropriate fees provide an opportunity to recover a portion of these costs. The opportunity cost of not reviewing and adjusting fees more regularly is significant. Simply applying inflationary adjustments would result in increased revenues of approximately R7.5 million representing a 50% gain relative to the pre-COVID revenue baseline (the average between 2018/19 and 2019/20) of R14.7 million. This increase in revenue is a likely minimum as benchmarking results indicate potential for fee increases beyond inflation in certain instances. At the risk of generalising, national fees for TOPS and AIS permits are particularly low relative to those in other countries. Fees for CITES (in the Draft CITES Regulations), boat-based whale watching, white shark cage diving, BABS and hunting generally compare better with those in other countries.

Determining appropriate fee amounts is seldom straightforward and is an important element in the success of the overall regulatory framework around permits and licences. Aside from their direct link to revenues, fees can influence the behaviour of applicants and the relationship that applicants have with regulators. Adopting the Fee Determination Framework should assist with the challenging and ongoing process of determining and adjusting fees appropriately. Application of the Framework should not be complex but does rely on improved data generation and keeping by issuing authorities (e.g. of permit processing costs).

Fee amounts and processing costs estimates for some fee types were found to vary by multiples of over 10 between provinces highlighting both the case for standardization and the challenges that would be associated with it. In any event, standardisation of fee amounts should be preceded by other forms of standardisation or rationalisation including more uniform provincial legislation, rationalisation and alignment of permit types and names, alignment of permit validity periods, alignment of permitting protocols or work processes, etc.

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# Appendices

Appendix 1: Revenue generated from permtis and licences as a proportion of budget allocation to the permit and licencing function in each department and province



Appendix 2: Summary of processing costs for similar permits issued per province



1. Blank cells indicate instances where data was not available. [↑](#footnote-ref-2)
2. Based on partial data received from issuing authorities with low levels of consistency between provinces. The data will have to be revisited and revised as needed. A more detailed table with amounts for individual deparments and provinces is provided in Appendix 1. [↑](#footnote-ref-3)