

30 June 2016

Ms D. Franzman
Chief Director: Social Justice and Participatory Democracy
Department of Justice and Constitutional Development
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Delivery per email: nap@justice.gov.za

Dear Ms Franzman

Inputs and comments regarding the draft National Action Plan to Combat Racism, Racial Discrimination, Xenophobia and Related Intolerance

This letter contains AfriForum's comments and input regarding the draft National Action Plan to Combat Racism, Racial Discrimination, Xenophobia and Related Intolerance (NAP). These comments either apply to the draft as a whole or, where specified, to a certain part thereof.

As a general comment regarding the whole draft document, we find that there is a gross lack of self-criticism from the government's side. Although this does not necessarily negate the information provided in the document, it does create the impression that government is first attempting to make itself look good to others – before actually combatting racism, racial discrimination, xenophobia and intolerance – by selectively withholding certain information and refusing to accept some responsibility for the status quo.

The sections on education (Sections 54–60) fail to mention that 80% of South African schools are dysfunctional. Although government is eager to mention factors over which it has no control, such as family commitments, having to work at home and pregnancy, it conveniently fails to mention that South Africa's education system – particularly in terms of math and science – is amongst the weakest in the world. Although integration and anti-racism training are commendable initiatives, we believe that the biggest crisis in education is either the quality of available education, or the complete lack of available education. Government's refusal to even recognise this issue in the NAP is testimony to

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how disconnected it is from reality and makes a mockery of the “high-quality education” mentioned in Chapter 9 of the National Development Plan.

Logically, the above is directly related to the sections about employment and income distribution. If government is unable or unwilling to ensure high-quality education for all South Africans, the poorest black communities are most likely to carry the heaviest burden in terms of unemployment and income distribution, as they are disadvantaged right from the start.

With reference to both the definition of “affirmative action measures” (p. 5) and the sections on employment (Sections 26–37), we would like to refer you to the report *Race relations in South Africa – Reasons for hope* which was commissioned by the South African Institute for Race Relations (SAIRR) and released on 29 February 2016. This report clearly indicates that the majority of South Africans believes that a job should be given to the best person, regardless of race – which indicates that merit, and not race, should be the dominant factor in job appointments. In addition, the majority feels that appointments should be made on merit, but with special training for previously disadvantaged people. The draft NAP (as is) makes no mention of merit whatsoever. Also, the term “qualified” is only used in the definition of affirmative action measures (p. 5), although preceded by “suitably” rather than “best”. The NAP should not be an appeal for mediocrity. We would therefore appeal to you to encourage all South Africans to strive to be the best they can be.

In order to provide a more complete picture, we suggest adding statistics on the ages of people in senior management positions. Experience is an important prerequisite for senior management personnel and, as such, time is an important factor. Negating the experience factor in favour of the racial factor has proven disastrous on several occasions in the past.

We thank you for considering our comments and suggestions.

Best wishes



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AfriForum