

18 January 2022

Hon. Fikile Mbalula  
Minister of Transport  
Republic of South Africa, Private Bag X193  
Pretoria, 0001

Per email: [TransportMinistry@dot.gov.za](mailto:TransportMinistry@dot.gov.za) / [groepez@dot.gov.za](mailto:groepez@dot.gov.za)

**RE: REGULATION 224 (B) ON THE TRANSPORTATION OF HIGH CUBE CONTAINERS  
ON SOUTH AFRICAN PUBLIC ROADS**

Dear Minister

BUSA has previously written to you expressing the concern of the business community regarding regulations on the movement of containers on South African roads of “high cubes.” Specifically, Regulation 224 (b) of the National Road Traffic Act (Act 93 of 1996) is, in BUSA’s view, out of step with international trends in which most containers manufactured and transported globally are high cube type containers. This fact serves to unnecessarily complicate South Africa’s trade and logistics, and introduces uncertainty among operators, by undermining the ease of doing business. Whilst several BUSA members have participated in forums convened by the Department of Transport on this matter, no progress has been forthcoming over the course of several years.

BUSA therefore proposes an urgent review of the relevant regulation to permit the transportation of high cube containers on South African roads (up to a height of 4.6m). Your immediate consideration of this proposal would be appreciated, and BUSA stands ready to engage further should additional clarification be necessary.

Kind regards



**Cas Coovadia**  
**CHIEF EXECUTIVE OFFICER**