



COMPETITION COMMISSION OF SOUTH AFRICA

In the matter of

ONLINE INTERMEDIATION PLATFORMS MARKET INQUIRY PUBLIC INQUIRY (OIPMI)

held at

***DTI Building
Sunnyside and virtually via MS TEAMS***

on

29 November 2021

PANEL: *James Hodge – Chairperson
And Doris Tshepe*

TECHNICAL TEAM

Noluthando Jokazi

CCSA Internal Team

COMPANY: DTIC



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PROCEEDINGS ON 29 NOVEMBER 2021

CHAIRPERSON: Good afternoon and welcome to the final afternoon and evening session of the public hearings in the online intermediation platforms market inquiry. My name is James Hodge and I am joined by my fellow panel member, Ms Doris Tshepe and also the case manager, Ms Noluthando Jokazi.

Today we have three participants. We are starting with the DTIC, and in particular the competition policy and economic planning division. We then follow that by Rebosa, the Real Estate Board of
10 South Africa and then finally Takealot and after that we will conclude these public hearings.

So I am going to invite Mr Brian Zondo, who is the acting chief director for the competition policy and economic planning division within the DTIC. Welcome, Mr Zondo.

MR ZONDO: Thank you, James and thanks to the colleagues and the panel.

CHAIRPERSON: And Brian, we might as well be on first name terms. You have got a presentation. Why do you not take us through it and then the panel may have some questions for you?

20 MR ZONDO: Thanks, James. I am going right through it. So the department, especially the policy branch we welcome the initiative of course. We are happy that we are looking at the subject, particularly we are interested more in terms of the participation. The opportunities to participate for the regular South Africans, more especially the SMME's in the sector.

We understand that inquiries give us an opportunity as government, to introduce policy interventions that aims at deconcentrating the economy, especially markets where we feel that the HDI's are not necessarily participating as strong in those markets and sectors and so we feel that it is necessary for us as government to support this inquiry, and we are looking forward at the end of the day, at the end of the process and the recommendations and the findings of the inquiry and see how government can help facilitate the implementation of this process.

10 We do not have major issues with the inquiry per se, but we do have a couple of, if not three points that we wanted to highlight to the panel and we want to maybe hopefully that we will be able to engage on. We understand the time limitations that the inquiry has. 18 months is not enough to complete, to include everything in the scope but we are particularly disappointed by the fact that the Fintech industry or category of the inquiry, is going to be excluded in this inquiry.

We feel that the Fintech offers an opportunity for the inquiry to be as decisive and collective in terms of looking all of the different sectors, and we know with the fourth industrial revolution, that the
20 Fintech has been very instrumental in developing or growing or supporting small businesses in different ways that the traditional financial institutions could not and we felt that maybe, if the scope could have been extended, this would have been a great part of the sector to look into.

Notwithstanding that, we understand the fact that the... through

the statement the inquiry has set aside that Fintech intergovernmental forum with the Reserve Bank and national treasury. I think that that is a good move and we are hopeful that the issues that could not be brought into the inquiry, then this forum is going to be quick in solving them and bringing them further into the mainstream economy, through policy discussion and policy engagement and hopefully that this forum would be able to then highlight some of the problems that the inquiry could have handled.

If Fintech is not included in the inquiry, then we also need to then
10 just look at how we can then identify issues that would have related to Fintech and they are able to redirect them into this forum. Of course the department being DTIC, are mostly involved in most of the sectors of the economy.

We would keep our eyes very close to the proceedings of this forum and we will actively engage the commission to find out how some of these issues they would have liked to bring into the inquiry through this Fintech scope, exclusion are going to be handled going forward. One of the biggest issues that we have of course in SMME's is the meaningful participation of SMME's and different value chains within the
20 sectors and we feel that in the digital platforms, there are opportunities that may be created for SMME's to participate.

The state of... the terms of reference including the statement of issues, highlights these opportunities very well. We are happy that the Commission and the inquiry is looking at supporting these value chains and we are also interested in looking at how we can then identify each

value chain, look at maybe developing some sort of a master plan in terms of developing a master plan that will assist SMME's to participate in these value chains, rather than just outlining them that they are there.

But at the same time, we feel that maybe through this inquiry process, as you build into the conclusion of the inquiry, you might be able... you might want to deal more in terms of explaining these value chains and where are the opportunities within the value chains for the SMME's to participate.

You must also remember that this is highly technological sector
10 that, and it is very capital intensive. So it might be difficult for SMME's to who do not want to do, to participate upstream in the value chains and would know what are the opportunities that are valuable for them downstream.

So and this point I will bring it back later on, when I look into the issues of the informal economy, and so we are happy with what... the analysis that has been given by the statement and the terms of reference at the moment, but we are worried about the systematic exclusions that that could happen.

That could creep in where SMME's because of the cost barriers
20 and I mean capital barriers and other technological barriers, they might find the same excluded in participating in these value chains. One of the worries that we also have, that we picked up is that there is little protection for SMME's in the sector.

The platform owners are more interested in the development of the product. They are not interested in terms of the origin of the

products. They are only interested in selling. So what is a problem for us is that we need to be able to have a mechanism where these platforms are able to compare the origin of inputs when it comes to the input manufacturing.

Input of products into the final program, especially when there is competing products that come from abroad. We want to have a protectionist approach where SMME's locally who participate in the production of inputs into added products or finer products, are able to compete in price.

10 Are able to take advantage of the local conditions and they are incentivised for the, the sellers or the producers are then incentivised to buy local or to consider local inputs, even though inputs from abroad, especially from areas like China might be cheaper to bring in or even exporting the whole production to China and bring in a finished product locally.

 So I think that we feel that the inquiry needs to also look at coming up with some suggestions around how to incentivise producers to look local. So that we are able to promote a local investment and local procurement. One of the biggest problems that we have, I think
20 we need to highlight in this, is that there is a lack of accountability and there is also an opportunity to abuse the system in terms of the digital platform.

 There are two examples that I want to bring in. One is the historical one and the second one is the emerging one. Historically, if you look at especially if you look at also in the land transport inquiry, you

will find that there has been a reluctance by operators like Uber who felt that their job is to provide a service, and then all the other unintended consequences, policy consequences or social ills that comes from the service, they do not take responsibility on them,

We use the example here where Uber in terms of where the, we have experienced labour relations issues and industrial protests within this business sector, the Uber as an owner and operator, would then say no, they are not responsible for this because they are not employers, and this gives generally the Labour Relations Act and the Labour
10 Relations in general in the sector, difficulty to manage, because the inventors of the technology, the operators of the technology therefore, then talk.

They do not take responsibility when it comes to the protest on unrest that comes as a result of it. The second point that we wanted to highlight as well, and I am not sure if the inquiry has picked it up already, but we have received as the department, numerous complaints which are similar to those that we see in the logistics sector.

The long-hauling of the issue of foreign national drivers in the truck industry. So here you will find that there is a lot of almost an
20 exclusivity of scooter drivers who are delivery Mr Food products, Uber Eats and deliver to restaurants who are exclusively foreign national. We do not know at this moment, we have not done the research.

We do not know whether this is a result of a hiring requirement, entry requirement or by pure default or an invisible hand of the market, and I think this is an important part that the market... that the inquiry

needs to look at. We know that this is not part of the scope but protecting employment and looking at promoting local employment is also very important.

This, going forward, might have an opportunity to bring in unwanted social ills like we have seen in the trucking sector. It is a ticking time bomb that is waiting to happen and much like in the Uber and meter taxi wars, we might have a problem where we have... where legislation and policies are unable to deal with the political fallout that will happen as a result of this markets and the way they mutate.

10 Yes, I know James is going to skill that this is outside of the scope of the Commission but it is something that we feel maybe we need to look at in the cause of the inquiry. Just to continue with this point about lack of accountability, other issues that we wanted to bring in, is that the digital platforms do not offer any opportunity for the owners to be intensified to be developmental.

They are just responsible for providing the service, but in terms of how they bring in SMME's, how they incentivise youth and female owned entitled into the system, it is unclear whether even government has the ability to introduce those things and so we feel that if the inquiry
20 takes a look at how it can link government developmental policies into this, we are not talking about issues like codes of conduct.

We are not talking about issues like targets or transformation targets, but at the same time those are the kind of things that we are looking at when you say how do we link governmental developmental goals into the sector. As I said before, digital platform owners are

reluctant to share on the product placement risk and unfortunately this is more evident in the informal trader's economy.

The informal traders and the informal economy are quite critical in this sector, especially when you look at telecoms, in their ability to be able to re-sell the vouchers, and all of the other products that that can be sold informally. But at the same time, because of technology it is unclear how the sector is going to be able to welcome or increase or incentivise participation of informal traders into the sector.

We do not have a particular living example on this point, but we
10 feel that the move towards the digital platform is more technological, but at the same time it has a danger to alienate informal traders and those who operate in the informal economy. Of course, at the end of the day the department feels that we need, as I said we need to investigate the lack of support in the informal traders.

We also need to investigate or connect it to other inquiries that has been going like the data market inquiry, the high cost of connectivity when it comes to informal traders and how they can be subsidised to participate in these sectors, and I think this is the second last slide that we have.

20 We are very happy that the inquiry has shown that there are large opportunities in terms of promoting SMME participation in the travel and tourism sector. I think the terms of reference, the statement of issues, have been able to outline this very well. So the government here would like to extend this opportunity by making sure that in the findings of the inquiry or recommendations, we bring in the Department

of Tourism and the Department of Small Business that looks at making further enroots in promoting SMME participation in the travel and tourism area.

Especially when it comes to local township economy and local or local products or local travel products. When you think of the Shot Left initiative, these are opportunities where SMME's could be able to participate, but the question is how many of them are going to be able to use the platforms to grow their business, to market their business, to maximise their participation in the sector through the online platforms,
10 and this is where the inquiry is quite important.

It is going to create a new market, alternative market even for the foreign, even for the international market, people who want to participate in township excursions. They are still going through your upmarket if you will, for the lack of a better word. Your more established travel agencies and there is a reluctance to subcontract the township based SMME's in the industry to then being able to show case the kind of products that you may find in the township.

This also is linked to the point that this sector will bring in more SDI's and HDI driven products, as I said in the township market, and in
20 a sense dispel this market perception that township products or township economy excursions are unsafe and there is always a security issue.

I feel that in the market, what we have seen in the past through our work with Department of Tourism, and there has been a lot of community engagement in safeguarding some of the products that we

could find in the township and if you think of areas like the Hector Peterson Square in Soweto.

You will find that there is community involvement in providing security and ensuring security and safety of the international visitors who are coming in this place, but you will find that there is no platform that is actively engaged to popularise those destinations from the international market, direct marketing if you will.

So we are happy that the inquiry has picked this up and as I said, together with the Department of Tourism and small business we
10 are working together in promoting some of the incentives that we have worked together to establish in the Department of Tourism to promote this kind of tourism, and I feel... we feel that these platforms are going to be critical in continuing to doing the great job in that particular space.

This point links to the previous one, that the DTI platform provide opportunities for a new market, for new routes to market for SMME's explaining how we can now integrate the new township economy. But one thing that we also need to look that the likes of Takealot needs to look and I have seen, anecdotally we have seen that Takealot and I am not going to be speaking on their behalf here, that they are trying to
20 have this secondary warehousing where a pickup point are being identified.

For now, and as I said this is no imperial research that we have done, but we have not seen much of these pickup points being created in townships. So if you think of opportunities like mini warehouses, in townships where Takealot can start looking at them as pickup points, it

could be a matter of the markets not available, but the market is not available because of these digital platforms, of all the problems that I have highlighted before of the digital platforms.

Being lack of connectivity, our awareness and the cost to that connectivity and we feel that this opportunity here of the inquiry, it might actually promote the idea of creating this mini warehouses, and this point also link to the current implementation of the grocery retail market inquiry as well.

So we feel that at the end of the day that is where we are able to
10 identify this opportunity. My last point is on the barriers to entry and this point the inquiry has dealt with it very well and we have acknowledged all of the different aspects of it. So there is really nothing new that we are bringing into this point, but we just want to highlight again the cost of connectivity, the issues of platform subscriptions and the intellectual property.

This is way too high for SMME's to be able to navigate through them. They are very complicated for a small start up to things, so you might think that a youth owned tech company would be able to go through these things, but at the same time if you look at our
20 developmental finance schemes at the moment we are not financing these types of cost, subscription costs.

The IDC cannot fund it. The NEF are not subscribing to it and so you will find that this cost is only incumbant to the entrepreneur and there is no platform for them to be able to get support, especially in the department or in government.

So we are encouraged by this process but at the same time we hope that at the end of the day, the inquiry will be able to deal with issues and investigate areas where how to deal with the inherent capital costs of the sector, the technical requirements. As I said which all of these things discourage new participants into the sector.

The first movers of course will continue to have the advantage of the sector but how do we then promote... how do we promote new entries into the aim, into the sector, but at the same time making sure that we continue to uphold the competitiveness, the nature of the sector
10 and encourage more people to join in without the competition policy of the government being more interventionist or protectionist in their approach.

So James and colleagues, thank you very much for giving us an opportunity as the department to share our inputs into the inquiry. We hope that our two cents worth of inputs and comments would have given the inquiry a better direction. I think we are looking forward to a more constructive engagement as the inquiry concludes.

Thanks.

MS TSHEPE: Good afternoon, Mr Zondo and welcome. Thank you
20 very much for your presentation. As James said, my name is Doris Tshepe and I am a member of the panel.

MR ZONDO: Thank you.

MS TSHEPE: We really appreciate the DTIC making a presentation and its contribution to the inquiry. I just wanted to just acknowledge some of the issues that you have raised and that we have already heard from

some of the platforms that for example are operating in food deliveries.

For example in townships, for example and the issue you spoke about regarding the employment of foreign nationals in the food delivery sector, that that is then one of the key issues that has been raised and we have engaged with some of the platforms on that. So I just wanted you to know that it has actually been raised.

Before we continue, could I ask you to stop sharing the presentation so we can see you properly? Are you able to? Oh, perfect. Thank you, Mr Zondo. Mr Zondo, the other issue... so over and
10 above just acknowledging that that has actually been raised already with the inquiry, the second issue is that there are some of the concerns that you are raising and I think for us as the inquiry, what we would appreciate, is a further engagement with you on some of the recommended remedies that as the DTIC you think we should take into account as we go into drafting our preliminary report.

So we would appreciate further engagement with you on that. the other issue that you raised on your slides on barrier to entry related to costs and particularly what is funding to SMME's and businesses owned by HDI's. A number of the businesses, particularly township
20 businesses that spoke to us, were raising concerns about funding, particularly from public funding entities.

We just thought to understand from your point, as the DTIC what programs do you have in place currently relating specifically to online businesses, be them at DTIC specifically or government generally. We just wanted to understand because this has been the biggest concern

that we have received from SMME's participating in this.

Be them in food delivery or in groceries or other broader sectors. We have received this as a consent issue and we just thought it would be helpful if we heard from you on what are the programs and whether they are targeting online businesses.

MR ZONDO: I mean maybe the disclaimer that I will not be able to be speaking on behalf of the development finance institutions, I will be speaking on what I know.

10 This is a point that we raised earlier on and we said in the presentation that the point of departure is to first look internally within government. If you look at the products related, for example when we pull out the tourism, the travel and tourism sector, the Department of Tourism has set up a micro enterprise, a micro tourism enterprise fund.

The micro and tourism enterprise fund is not exclusively for online market. But it is just a general fund that support township based black owned, youth owned travel and tourism enterprises for the lack of a better word, but if the question whether those products are specifically for online market or online entrepreneurs, it is a different case altogether.

20 From my experience of working with the likes of SIFA and IDC and NEF, I would not be able to categorically state whether there is a product that is based on that, but of course there has been research and investigations on how to support some of the... the Fintech type of markets.

That is why early in the beginning of my discussion I raised the

issue of the Fintech exclusion because I think that is where development finance are driving towards, in terms of financing entrepreneurs who are looking at opportunities around the Fintech and so this as I said, creates an opportunity for us to be able to look into those things.

To call upon the DFI's and sit them around the table and say this is where the market is going, here are the opportunities, but these are the gaps and the biggest gap of them all is the lack of specialised funding. What is the problem, how can we then solve it.

10 MS TSHEPE: Thank you, Mr Zondo and I think you raise a very important issue, which is for us as the inquiry, one of the things that we could do as part of the recommendation is recommend a policy intervention by government in these areas, and I think for us you mentioned NEF and the one small platform that operates in the township, specifically mentioned that when they went to NEF to seek funding, they were told that they do not support online businesses.

They do not have funding for online business. So that is different to the funding is broad to more we do not provide that funding and in our view, when government is looking at digital markets as a
20 platform for economic development, we should be looking more to ensure, more focussed funding in this regard.

I do not know what your view is, having working with NEF and if you know anything of that sort.

MR ZONDO: No, I totally agree, Ms Doris. If you look at the implementation history of previous market inquiries, these policy

recommendations have been able to be put forward and implemented on. I mean there are strides that are now on foot if you look at how, in the grocery market inquiry plans are on foot to discuss the areas of how to create specialised and innovative funds for the sector in that particular region.

I mean, the IDC have a division that looks at new industries and when you talk about new industries, we do not only talk about technology-based industries, but we are looking at different types of industries that come up as a result of the revolution, the industrial
10 revolution that is currently happening.

To say that the product and services that are offered by the development finance institutions are cast in stone, would have been a problematic approach. Obviously they need to be able to accommodate the kind of economy, as long as there are markets that are created there.

This is why all of this development finance institutions, they report to government. The large majority of them reports to the DTIC and there are internal processes through your monthly quarterly meetings, your engagement with the principles with the entities. Your
20 strategic board meetings that where these things can be brought forward and be thought through thoroughly in terms of identifying specialised funds to respond to what is happening in the economy.

There is nothing new there in terms of identifying or implementing new types of funding approach.

MS TSHEPE: Thank you, Mr Zondo. Can I ask, I mean is there some

coordination within government working alongside the DFI's on this? Is that role the DTIC's role or someone else is dealing with that?

MR ZONDO: Not particularly a design structure or strategy but of course led by the national treasury there is a unit at national treasury under the, I just forgot the branch at national treasury that is responsible for coordinating all of the DFI's and that is where most of the policy work is done and discussed and of course, as I said you do have quarterly engagement between the entities, the DFI's and the DTIC.

I know that SIFA which reports to the Department of Small
10 Business, also has the same structure. So the platforms to engage are there. The policy engagement platforms are always around and if you look in the last 12 months, with the reconfiguration of SIFA they have been able to create a large amount of new offers, a new product.

Excuse me, into their service offering and if you think of the Kwaze equity programs that have been put in, there have been particular funds that they have set aside for township economy, especially for township economies. For processing. So as I said, these opportunities are always there and the DFI's are able to pick them up and implement according to the demands of the economy.

20 This is no exception.

MS TSHEPE: Thank you, Mr Zondo. I just wanted to talk on the next issue which is we spoke to SAFCA, the venture capitalist and private equity association of South Africa, and when we were talking to them and even from the other smaller platforms, it appears that precede and seed funding is not readily available or provided by the venture capitalist

industry.

We also heard that the SME fund was created and provided funds with a specific mandate particularly for HDI's and SMME's. Do we have any such funds available, other than the SME fund? Are you aware where government is involved and is there more that government could do in this space?

Most of the small platforms that we are speaking about, they say they do not qualify for the other funds that are provided by the venture capitalist industry and the more money required is at precede and seed
10 funding stages.

MR ZONDO: I would not say a specialised fund per se, but there are programs if you look at the likes of Cedar, who is able to provide non-financial support. The likes of the technology South Africa, which is able to provide funding for pre-commercialisation or pre-production stages at the conceptual stage of the idea.

The SABS is also having some products that are not cash value, but non-financial support and lastly also if you look at the, there is a commercial... there is a research institution within the department of technology and science, that has a pre-production funding facility that
20 looks at compliance issues, how to get from concept to commercialisation.

But none of the are just standing there specialised to... most of them are just responding to the applications and demands that come along, but as to say the financial... the funding gap that currently exist for start-up is huge. Of course, if you go to the likes of SIFA and IDC,

you need to have a track record.

You need to have a substantial amount of financial documents to demonstrate that you have been operating or you are operating, even though there is a scope to fund start-ups, but that funding is not enough and that gap unfortunately I do not think that at the DTIC level or at the competition branch level, those issues are going to be clearly defined.

I think maybe what as a recommendation that I can do, is to extend invitation to speak to the industrial finance division of the DTIC. They are the ones that are developing incentives, promoting incentive,
10 developing incentives and also identifying spaces where new incentives can be put into the economy.

I think that this is one of those opportunities.

MS TSHEPE: That would be greatly appreciated, because I think there is a gap and almost presenter after presenter, particularly the small businesses of historically disadvantaged, owned by historically disadvantaged individuals, that is the one issue they have spoken about, and if there is a way in which we can deal with this gap, we would appreciate it.

So please extend the invitation to the industrial finance division
20 and just to talk of some of these things, because those will then form part of our recommendation as the inquiry and we would really appreciate it. I mean, some of the township business, online businesses, in fact they deal with a lot of the issues you are raising.

Getting products of informal sectors, promoting and hiring drivers of people in those townships to ensure that everyone

participates. So there are exciting things that people seem to be doing, but struggling with funding and it would be quite helpful to do that. The last part I wanted to ask you, I mean it was just a general question, Mr Zondo.

Which was what else do you think can be done to address this inequitable access by either SME's or businesses of historically disadvantaged individuals, to access online platforms from a governmental perspective.

MR ZONDO: Because I am partly also involved in looking at the data market inquiry, there has been some good recommendations in the data market inquiry. If you look at the recommendation to expose or expand the free to connect or free connectivity platforms in the data platforms, like where you have government departments, like the Department of Education running those websites for information purposes.

This could be also expanded in terms of providing information to... through to the entrepreneurs in the township through this free, I would call them free to air platforms for a lack of a better word. Because the key problem is information, and one of the things that we have seen through our experience is that the historically disadvantaged entrepreneurs are not necessarily able to participate in new markets.

They are not able to be pioneers of new markets and they are not first movers as it were, because of the effect that this kind of markets or any new market, will require to be tested by commercial or corporate companies and at the end of the day, they come in always at the tail end of these opportunities.

So government needs to look at promoting these kind of new markets, rather than waiting for participation and then complain later that there is exclusion in those markets.

MS TSHEPE: Thank you, Mr Zondo. I mean I think it would be quite helpful if there are any further recommendations you have that you could maybe submit to the inquiry in this regard. If you think of any further or substantiate even on the ones that you have told us and the ones that you spoke about in your presentation.

We would appreciate it. I will hand over to James, if he has any
10 further questions to you, but thank you very much for your participation,
we appreciate it.

MR ZONDO: Thank you.

CHAIRPERSON: Thanks Brian, I do not really have any questions. Just maybe to reiterate what Dorris indicated that I suppose we have to look at funding, but also non-funding opportunities from government, because obviously you know, physical resources are limited and there is many demands on it.

So I think if we can consider both those types of interventions and what recommendations we can make in order to government at
20 least around what can be done to improve participation in the online economy. I think your observation is often right, that historically disadvantaged businesses are not necessarily going to be the pioneers and may be coming in a bit later, but the problem with online markets is that it can be that the first movers have a considerable advantage over those that come later.

So it is going to be even more challenging, potentially around enhancing participation later and that is why we need to act earlier. So we look forward to those engagements and also the facilitated engagements with the funding institutions. I think that is an important channel for us and certainly before we are aiming to get a preliminary report out by May next year and we will pick up the engagements in the new year I think, with the DTIC can yourself.

But I think it is just left for me to thank you for the participation in coming here. I know you had to fit in with the schedule, given there was
10 one day left, but we appreciate that you accommodated us and thank you for the presentation and the insights on the DTIC.

MR ZONDO: No, welcome colleagues. Thank you very much for the opportunity and I am looking forward to further engagements.

CHAIRPERSON: Thanks, Brian you can leave the virtual stage now and we can, I think welcome Mr Jan le Roux if that is right.

SESSION ENDED

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