



September 1st 2026

RE: QUALIFICATION 50480 — GOVERNMENT GAZETTE NO. 54992 OF 14 JULY 2026: RENEWED NOTICE, FORMAL ENQUIRY AS TO FUTURE CUSTODIANSHIP, AND NOTICE OF INTENDED APPLICATION UNDER THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

For the attention of:

The Chief Executive Officer, Quality Council for Trades and Occupations (QCTO)
Attention: Mr Vijayen Naidoo — publiccomments@qcto.org.za

Copied for information and formal notice to:

The Director-General, Department of Higher Education and Training (DHET)
The Chief Executive Officer, Safety and Security Sector Education and Training Authority (SASSETA)
The Chief Executive Officer, South African Qualifications Authority (SAQA)
The National Commissioner, South African Police Service (SAPS)
The Head, Central Firearms Registry (CFR), SAPS

Dear Sirs,

1. This letter ought to be read together with, and does not repeat save where necessary: (a) Safe Citizen's formal submission of 27 July 2026 on Government Gazette No. 54992 of 14 July 2026 ("the Gazette Submission"); and (b) Safe Citizen's Letter of Enquiry and Formal Notice dated 31 July 2026 on the adequacy of QCTO's dissemination of the Gazette ("the Consultation Letter"). Both are on QCTO's file. This letter serves three purposes: it places QCTO again on formal notice of the matters raised in each; it raises a further, specific and formal enquiry as to the future custodianship of qualification 50480; and it records, in the clearest terms, the course that we shall follow if these matters continue to go unanswered or are not equitably dealt with.

2. More than five weeks have now elapsed since the Gazette Submission, and more than four weeks since the Consultation Letter — the latter having called for a substantive written response by no later than 3 August 2026. Safe Citizen confirms, for the record, that it has to date received no substantive written response to our letter of July 31st - no engagement with the merits, no confirmation of what dissemination steps (if any) were taken, and no indication of whether the comment period was extended. Silence of this duration, on a matter of this consequence, is itself a fact this letter places on record.

3. Mandate: as before, Safe Citizen addresses this matter in the public interest and on behalf of affected citizens, learners, employers, training providers and communities concerned with public safety.

A. Renewed notice: the Gazette Submission

4. Safe Citizen places QCTO again on formal notice of the substance of the Gazette Submission, in particular:

(a) that the extension of qualification 50480 to December 2028 is a transition runway for an orderly, evidence-based process — not licence for QCTO to treat the underlying question of custodianship as settled, or to arrive at a rushed or undisclosed change of custodian by the time that date approaches;

(b) that PFTC has built, over its period of custodianship, a substantial and verifiable institutional record — quality-assurance history, a functioning provider and assessor network, moderation and audit infrastructure, and an issuance record now standing at approximately 3.5 million unit standards issued and verified — and that existing specialist capability of this kind should not be discarded, duplicated or replaced without a demonstrably equivalent or better alternative; and

(c) that any change QCTO does propose must follow a transparent, objective and technically appropriate process, with any alternative to PFTC required to demonstrate quality-assurance safeguards that are equivalent to or better than those PFTC currently provides in practice, not merely on paper.

No substantive response of any kind has been received to any of these points.

B. Renewed notice: the Consultation Letter

5. Safe Citizen places QCTO again on formal notice of the Consultation Letter, which raised — as a distinct legal obligation, not a matter of preference — that reliance on bare Gazette publication does not, without more, satisfy QCTO's duty to facilitate meaningful public participation, and called on QCTO to confirm what dissemination steps beyond gazettal were taken, to extend the comment period if those steps were inadequate, and to preserve all records bearing on the point. None of this has been answered. Safe Citizen records that it continues to reserve every right identified in that letter, including the right to challenge the validity of any process that proceeds without this having first been resolved.

C. Formal enquiry: the future custodianship of qualification 50480

6. Safe Citizen records that PFTC was itself commissioned by QCTO, at industry expense, to design the re-aligned qualification now published under Gazette 54992 — the very qualification apparently intended in due course to succeed 50480. Safe Citizen further records that information has reached it, from sources it considers require QCTO's direct and candid response rather than speculation on Safe Citizen's part, to the effect that QCTO and/or DHET may be considering, or may already have adopted in some form, a plan to remove or dilute PFTC's custodianship of qualification 50480 (or its designed successor) in favour of an internal QCTO function underpinned, resourced or supported by the SAPS Training Division. Safe Citizen makes no finding as to whether this is true. It is precisely to test whether it is true — and, if so, on what basis — that the questions below are put.

7. Each question below is drawn directly from, and is intended to test QCTO's position against, the reservations and concerns already placed on record in the Gazette Submission and summarised in paragraph 4 above. We ask that QCTO answer each one specifically and in terms. A general, partial or evasive response — or a response that addresses some questions while remaining silent on others — will be treated by Safe Citizen as a failure to answer all of them, for the reasons given in paragraph 9 below.

8. Safe Citizen accordingly requires QCTO to answer, in writing:

8.1 Does QCTO, whether alone or jointly with DHET, have under consideration — whether as a concept, a draft, a business case, an internal proposal, or an adopted policy position — any plan or process whose effect would be to remove, transfer, reduce, dilute, or decline to renew or extend, the custodianship of qualification 50480, (or of its re-aligned successor qualification as developed by the PFTC in concert with QCTO), presently held by PFTC?

8.2 If the answer to 8.1 is yes, in whole or in part: is any such plan directed at transferring that function to an internal QCTO unit, division or capability rather than to another external, independent quality assurer?

8.3 If the answer to 8.2 is yes, in whole or in part: would that internal QCTO function be established, staffed, seconded, trained, resourced or otherwise materially underpinned by the SAPS Training Division, or by any other component of the South African Police Service?

8.4 What specific failure, deficiency or disqualifying conduct on PFTC's part — as distinct from a general preference for the function to sit inside QCTO or another state structure — has been identified as founding any plan of the kind described in 8.1 to 8.3, having regard to PFTC's record of approximately 3.5 million unit standards issued and verified without any substantiated quality-assurance failure having been put to PFTC?

8.5 Given that PFTC was itself commissioned to design the re-aligned qualification published under Gazette 54992, on what basis does QCTO consider it consistent with a transparent, objective and technically appropriate process — the standard by which QCTO itself says such decisions must be made — to draw on PFTC's expertise to build the qualification while simultaneously considering PFTC's removal from administering it?

8.6 Has any alternative arrangement, including an internal QCTO function underpinned by the SAPS Training Division, been assessed, tested, piloted or benchmarked against PFTC's current infrastructure — its provider and assessor network, its moderation and audit systems, and its verified issuance record — and shown to offer demonstrably equivalent or better safeguards? If such an assessment exists, we ask that it be furnished. If it does not exist, we ask QCTO to confirm that it does not.

8.7 By when, relative to the confirmed extension of qualification 50480 to December 2028, does QCTO or DHET intend to make any determination on the future custodianship of this qualification, and will PFTC and interested and affected stakeholder (including the public) be given a genuine and effective opportunity to be heard — consistent with the obligations already raised in the Consultation Letter — before any such determination is made, adopted or implemented?

8.8 Does QCTO accept that the training regime for firearm competency in South Africa has, prior to PFTC assuming custodianship, previously failed to a degree that placed public safety at risk? If QCTO does not accept this, on what factual basis does it dispute it; if QCTO does accept it, what specific safeguards does it propose to put in place, before any change of custodian, to ensure that history is not repeated?

8.9 Confirm that, consistent with the preservation request already made in the Consultation Letter, all records bearing on the matters raised in questions 8.1 to 8.8 above — including concept documents, business cases, costings, correspondence with SAPS or the SAPS Training Division, minutes of any meeting at which this matter has been discussed, and any risk or public-safety impact assessment — are being preserved in unaltered form and will be produced on request.

9. Safe Citizen requests QCTO's full, written answers to questions 8.1 to 8.9 above, and a substantive written response to the outstanding matters raised in the Gazette Submission and the Consultation Letter, by no later than 30 September 2026. Safe Citizen records, for the avoidance of any doubt, that a failure to answer any one or more of these questions fully and specifically by that date — whether by silence, partial answer, or a response that does not engage with the question asked — will be treated by Safe Citizen as a constructive indication that responsive information exists and is being withheld, and will, without further notice, found the basis of a formal application under the Promotion of Access to Information Act 2 of 2000 ("PAIA"), to be lodged no later than 15 October 2026, for production of all records bearing on the matters raised in this letter, the Gazette Submission and the Consultation Letter.

D. Safe Citizen's position on record

10. Safe Citizen places QCTO, DHET and all copied parties on notice that it has no intention of relaxing its attention to this matter. With or without the active support of PFTC et al, Safe Citizen will continue — in stakeholder forums, in public commentary, and before policy-makers — to keep this matter squarely before the public, because the consequences of this training regime failing, as it has demonstrably done before PFTC assumed custodianship, represent a direct and material threat to public safety in South Africa. That threat is not confined to one sector: it reaches the standard of competency required of private firearm owners, the

private security industry and its statutory role in protecting persons and property, and, by extension, government's own obligations in each of those domains.

11. Having committed sustained effort across April, May and June 2026 to bring this matter to the attention of QCTO, DHET and other stakeholders, Safe Citizen does not intend to ease that effort now. We record our firm view that this qualification has twice been permitted to approach crisis point before a renewal was secured — most recently on 30 June 2026 — and that on neither occasion was this the product of considered stewardship by the State. It was, on the contrary, evidence that the State lacked, and on present information continues to lack, the technical and legal readiness to justify or execute a change of custodian. Nothing in the intervening period gives Safe Citizen any confidence that this has changed, or is likely to change within any timeframe consistent with the State's record of performance in this area.

12. Safe Citizen records its considered position: PFTC has built and maintained, over its period of custodianship, an unblemished quality-assurance record — approximately 3.5 million unit standards issued and verified — without a single substantiated failure of that record having been put to PFTC, or to the public. No reason, still less a good reason, has to date been advanced by government for why that delegation should not continue to be held by PFTC indefinitely, unless and until PFTC disqualifies itself by its own conduct. Until such a reason is produced and tested, any process directed at removing or diluting that custodianship — whether openly, or by incremental or internal administrative means — will be resisted by Safe Citizen through every lawful channel available to it.

13. Nothing in this letter constitutes a waiver of any right available to Safe Citizen, or any affected stakeholder. All rights are expressly reserved, including those already reserved in the Gazette Submission and the Consultation Letter, and including specifically the right to lodge the PAIA application referred to in paragraph 9 above, to pursue administrative or constitutional review, and to seek interdictory or declaratory relief, should this process proceed to finality without these matters first having been fully and candidly addressed.

We thank you for your attention to this matter and look forward to your written response by no later than 30 September 2026.

Yours faithfully,

Jonathan Deal
Director, Safe Citizen