



Address: **THE INFORMATION OFFICER, QUALITY COUNCIL FOR TRADE AND OCCUPATIONS (QCTO)**
C/O THE CHIEF EXECUTIVE OFFICER, MR VIJAYEN NAIDOO
256 GLYN STREET
HATFIELD
PRETORIA
0083
BY EMAIL: publiccomments@qcto.org.za ; info@qcto.org.za ;
ceo.naidoo@qcto.org.za
BY COURIER

CC: THE DEPUTY MINISTER, DEPARTMENT OF HIGHER EDUCATION AND TRAINING (DHET)
BY EMAIL: dmsdesk@dhet.gov.za

Your reference: **PAIA REQUEST**

Our reference: **SAFE CITIZEN ALLIANCE**

Date: **01 October 2026**

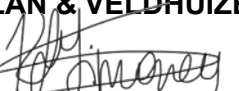
Dear Sirs/Madams

RE: APPLICATION FOR ACCESS TO RECORDS ITO S18 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000
QUALIFICATION 50480, GOVERNMENT GAZETTE No. 54992 AND THE FUTURE CUSTODIANSHIP OF FIREARM COMPETENCY TRAINING QUALITY ASSURANCE

1. We refer to the above matter and attach hereto a PAIA Application brought by our Client, Safe Citizen Alliance re Qualification 50480, Government Gazette No. 54992 of 14 July 2026, the details of which appear therein.
2. Kindly direct any further correspondence in this regard to pj@gvinc.co.za and katherine@gvinc.co.za.
3. We look forward to hearing from you.

Yours faithfully

GILLAN & VELDHIJZEN INC.

pp. 
PJ VELDHIJZEN
pj@gvinc.co.za

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Candidate Attorneys: Zandile Vava LLB (UWC) • Talitha Wyne LLB (UCT) **Conveyancing Secretary:** Colleen Sass **Consultant:** Abigail Reynolds



**APPLICATION FOR ACCESS TO RECORDS IN TERMS OF SECTION 18
OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 —
QUALIFICATION 50480, GOVERNMENT GAZETTE NO. 54992, AND THE
FUTURE CUSTODIANSHIP OF FIREARM COMPETENCY TRAINING
QUALITY ASSURANCE**

1 October 2026

Transmitted electronically by Safe Citizen's attorneys of record and delivered by courier

For the attention of:

The Information Officer, Quality Council for Trades and Occupations (QCTO)
c/o The Chief Executive Officer, Mr Vijayen Naidoo — publiccomments@qcto.org.za,
info@qcto.org.za, ceo.aidoo@qcto.org.za.

256 Glyn Street, Hatfield, Pretoria, 0083 / Private Bag X278, Pretoria, 0001

Copied for information and formal notice to:

The Deputy Minister, Department of Higher Education and Training (DHET) Dmsdesk@Dhet.gov.za

**RE: FORMAL APPLICATION FOR ACCESS TO RECORDS UNDER THE PROMOTION OF
ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA") — QUALIFICATION 50480,
GOVERNMENT GAZETTE NO. 54992 OF 14 JULY 2026, AND THE ALLEGED PROPOSED
TRANSFER OF QUALITY-ASSURANCE CUSTODIANSHIP TO AN INTERNAL QCTO
FUNCTION RUMORED TO BE UNDERPINNED BY THE SAPS TRAINING DIVISION**

Dear Sirs,

PART A: INTRODUCTION AND NATURE OF THIS APPLICATION

1. This is a formal application for access to records, made by Safe Citizen in terms of section 18 of the Promotion of Access to Information Act 2 of 2000 ("PAIA" or "the Act"). It is transmitted by Safe Citizen's attorneys of record by electronic mail and, for good order, also delivered to QCTO's registered address by courier.

2. This application does not arise in a vacuum. It is the direct and foretold consequence of a course of correspondence stretching back more than two months, throughout which QCTO has been placed on repeated, specific and escalating notice of Safe Citizen's concerns — and has, to date, answered none of them. Safe Citizen said plainly, in writing, on 1 September 2026, that continued silence would leave it no alternative but to invoke its rights under PAIA. QCTO has chosen that outcome by its own conduct. This application follows.

3. **Mandate:** Safe Citizen brings this application in the public interest and on behalf of affected citizens, learners, employers, training providers and communities concerned with public safety, in the exercise of the constitutional and statutory right of access to information held by an organ of state, and information required for the exercise or protection of rights, as guaranteed by section 32 of the Constitution of the Republic of South Africa, 1996, and given effect to by PAIA.

4. Safe Citizen records, for the avoidance of doubt and in terms expressly recognised by the Act itself, that it is not obliged to furnish reasons for this request, and that its entitlement to the records sought does not depend upon QCTO's, DHET's or any other recipient's agreement with, or acceptance of, the concerns that motivate it. Those concerns are nevertheless set out fully below, because Safe Citizen's position is that they will not survive scrutiny once the records are produced — and because the public, in whose interest this application is brought, is entitled to understand why it has become necessary.

PART B: CHRONOLOGY

5. The following chronology is relevant background to this application and, where it bears directly on the records sought, forms part of the basis for this request:

5.1 Qualification 50480 (Further Education and Training Certificate: Firearm Training, NQF Level 4, 141 credits) has, since April 2013, had its quality assurance functions delegated by QCTO to the South African Professional Firearms Trainers Council NPC ("PFTC"), on SAQA's public record naming PFTC as the qualification's Primary Quality Assurance Functionary.

5.2 In 2021, QCTO attempted to strip PFTC of this delegation in favour of SASSETA without consultation; a court order restored and maintained PFTC's mandate.

5.3 On 13 June 2024, QCTO purported unilaterally to re-delegate qualification 50480 to SASSETA with effect from 1 July 2024. PFTC's urgent application to prevent QCTO and SASSETA from developing a rival skills programme was struck off the roll for want of urgency on 2 October 2024 (South African Professional Firearms Trainers Council NPC v QCTO and Others (097482/2024) [2024] ZAGPPHC 1388), the court there drawing a distinction between an "inchoate and nascent" skills programme and a registered qualification. The substantive dispute — PFTC's application for a declarator affirming its authority over qualification 50480 and for review of QCTO's conduct — proceeded to further litigation (South African Professional Firearm Trainers Council NPO and Another v QCTO and Others (2024/066460) [2025] ZAGPPHC 795).

5.4 On 30 June 2026, qualification 50480 was extended, avoiding a second consecutive lapse into administrative crisis, this time to December 2028.

5.5 On 14 July 2026, Government Gazette No. 54992 was published, containing a re-aligned qualification intended, on Safe Citizen's information, to succeed qualification 50480 in due course. Safe Citizen records — and QCTO has never disputed — that PFTC itself was commissioned, at industry expense, to design this re-aligned qualification.

5.6 On 27 July 2026, Safe Citizen lodged a detailed formal submission on Gazette 54992 ("the Gazette Submission"), setting out, among other things: that PFTC's institutional record (a provider and assessor network, moderation and audit infrastructure, and an issuance record of approximately 3.5 million unit standards issued and verified without a single substantiated quality-assurance failure) should not be discarded or duplicated without a demonstrably equivalent or better alternative; that no Socio-Economic Impact Assessment appeared to have been conducted in respect of the proposed transition, notwithstanding the Presidency's own Socio-Economic Impact Assessment System ("SEIAS") requirements; and that credible information had reached Safe Citizen that an internal QCTO function, underpinned by the SAPS Training Division, was under contemplation as PFTC's replacement.

5.7 On 31 July 2026, Safe Citizen issued a further formal letter confined to the adequacy of QCTO's consultation process, recording that reliance on bare Gazette publication does not, without more, discharge a public body's duty to facilitate meaningful public participation, and calling for confirmation of what dissemination steps had been taken and for preservation of all relevant records. QCTO was given until 3 August 2026 to respond. It did not do so.

5.8 By 1 September 2026, more than five weeks having elapsed since the Gazette Submission and more than four weeks since the 31 July letter, without any response of any kind — no acknowledgement, no engagement with the merits, no confirmation of dissemination steps taken — Safe Citizen issued a Letter of Notice, Formal Enquiry and Notice of Intended PAIA Application. That letter renewed notice of both prior communications; posed nine specific, numbered questions (8.1 to 8.9) directly testing whether QCTO and/or DHET had under consideration any plan to remove, transfer, reduce or dilute PFTC's custodianship of qualification 50480 or its successor in favour of an internal QCTO function underpinned by the SAPS Training Division; called for a substantive written response by no later than 15 September 2026; and recorded, in terms, that a failure to answer fully and specifically by that date would be treated by Safe Citizen as a constructive indication that responsive information exists and is being withheld, and would found the basis of a PAIA application.

5.9 An open letter to QCTO's Chief Executive Officer accompanied the 1 September 2026 letter, expressly framed as an invitation to cooperative engagement rather than a threat, recording Safe Citizen's preference that a working system with an unblemished record of more than a decade not be interrupted absent any rational, demonstrated reason, and inviting QCTO to say plainly whether such a reason exists.

5.10 15 September 2026 passed without any substantive written response from QCTO to any of the nine questions posed, and without any response to the outstanding matters raised in either the Gazette Submission or the 31 July letter.

5.11 On 7 September 2026, and continuing weekly thereafter, Safe Citizen commenced a public campaign — the "Safe Citizen Monday Reality Check" — placing this matter before the public and recording publicly that a PAIA application would follow in the absence of a substantive reply.

5.12 As at the date of this application, no substantive response of any kind has been received from QCTO, DHET, or any copied recipient, to any communication referred to above.

PART C: THE GOVERNANCE AND ADMINISTRATIVE CONCERNS FOUNDING THIS APPLICATION

6. This application is founded, in particular, on the following matters of record, none of which QCTO has engaged with despite ample opportunity to do so:

6.1 The absence of a disclosed Socio-Economic Impact Assessment. The Presidency's Socio-Economic Impact Assessment System exists precisely to ensure that significant regulatory, legislative and policy proposals — and major amendments to existing regulations, policies and plans — are subjected to a structured assessment of their costs, benefits and implementation risks before they proceed, with sponsoring departments required to conform their policy-making processes to SEIAS "starting with the initial impact assessment immediately after the mandate to develop a process is received," and with the responsible Director-General and Minister required to sign for the quality of that assessment. A wholesale transition of the quality-assurance regime governing firearm competency training for South Africa — a regime with direct and material bearing on public safety, on the licensing of firearms under the Firearms Control Act, and on the livelihoods of an entire training and assessment industry — is self-evidently the kind of "significant" regulatory change SEIAS exists to capture. No such assessment has been disclosed, referenced in Gazette 54992, or produced to Safe Citizen despite specific request. Safe Citizen requires QCTO and DHET either to produce it, or to confirm candidly that none exists.

6.2 Administrative irregularities and an unevidenced rationale for replacement, as identified in Safe Citizen's Critical Review of Proposed Changes to Firearm Proficiency Training in South Africa (June 2026), compiled with the South African Gunowners' Association, BACSA, Natshoot, PFTC and the Lead Service Providers Forum ("the Critical Review"), finalised and released by Safe Citizen ahead of this application. The Critical Review's central and, on the material available to Safe Citizen, unanswered finding is that no specific, clearly articulated defect in the historical unit-standard-based regime has been identified or evidenced as requiring its wholesale replacement — no stated problem definition, no documented performance review, comparative audit, failure analysis or safety-based evaluation demonstrating that PFTC's quality-assurance function is deficient, and no clear account of who identified any such defect, through what formal process, or on what evidence. On the Critical Review's comparative analysis, the proposed skills-programme environment appears, if anything, less structured, less technically coherent, less assessment-driven and less visibly quality-assured than the regime it is intended to displace — a finding that, if correct, inverts the entire stated rationale for change.

6.3 An unresolved institutional mandate gap. The Critical Review further identifies that no single institution presently holds undivided authority to determine "equivalence" between the historical and proposed regimes: the QCTO/DHET framework governs education and training recognition, while SAPS, acting through the Central Firearms Registry, holds the effective legal and operational authority to determine whether training outputs are acceptable for firearm-competence and licensing purposes under the Firearms Control Act. This governance gap bears directly on whether any plan to underpin an internal QCTO quality-assurance function with the SAPS Training Division is lawful, coherent, or has been thought through at all — a further reason those records must be produced rather than left to speculation.

6.4 Inadequate consultation. QCTO has never confirmed what steps, if any, beyond bare Gazette publication, were taken to bring Gazette 54992 to the attention of the firearms instructors, range officers, assessors, moderators, training providers and learners it directly affects, despite specific request to do so by 3 August 2026.

6.5 Sustained, specific, unanswered questions. QCTO has had, since 1 September 2026, nine specific written questions squarely testing whether a plan of the kind described above exists, in what form, and on what basis. It has answered none of them. Silence of this duration, on questions this specific, is itself probative, and is treated by Safe Citizen, for the purposes of this application, as confirming that responsive records exist.

PART D: THE STATUTORY BASIS FOR THIS APPLICATION

7. This application is made under, and Safe Citizen expressly invokes, the following provisions of PAIA:

7.1 The Act's long title records that it exists "to give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights." QCTO is an organ of state and a public body for purposes of the Act.

7.2 Section 9 records the Act's objects as including giving effect to that constitutional right "subject to justifiable limitations, including, but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance," and establishing mechanisms enabling access to be obtained "as swiftly, inexpensively and effortlessly as reasonably possible."

7.3 Section 11 provides that "a requester must be given access to a record of a public body if (a) that requester complies with all the procedural requirements in this Act relating to a request for access to that record; and (b) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4." Safe Citizen records that this entitlement does not depend upon, and cannot lawfully be made conditional upon, any enquiry into Safe Citizen's reasons for seeking the records identified below.

7.4 Section 18 requires that a request be made in the prescribed form, to the information officer of the public body concerned, at his or her address, fax number or electronic mail address, with sufficient particulars to identify both the records requested and the requester. This application, read together with the Schedule at Part E below, is intended to satisfy those requirements. It is addressed to QCTO's Information Officer, in accordance with QCTO's own PAIA Manual (approved 17 March 2020), care of QCTO's Chief Executive Officer, at QCTO's registered physical and postal addresses recorded above. Safe Citizen's attorneys of record will, in addition, complete and submit any current prescribed form specifically required by QCTO's Information Officer, should the form of this application require supplementation.

7.5 Section 22 entitles QCTO to require payment of the prescribed request fee, if any, before further processing this request, and, in the case of records requiring a search and preparation of substantial duration, a deposit not exceeding one third of the anticipated access fee. Safe Citizen undertakes to pay any such fee properly and lawfully prescribed, without prejudice to its right to dispute any fee it considers improperly calculated or imposed for an improper purpose.

7.6 Section 25 requires that a decision on this request be taken, and Safe Citizen notified, "as soon as reasonably possible, but in any event within 30 days" of receipt. Should QCTO refuse access, in whole or in part, section 25 requires that the notice of refusal "state adequate reasons for the refusal, including the provisions of this Act relied upon." Should QCTO seek to extend that period under section 26, any such extension is limited to "a further period of not more than 30 days," and only where the grounds specified in that section are genuinely met — grounds which, given the extended correspondence already before QCTO on this precise subject matter, Safe Citizen does not accept are readily available here.

7.7 Safe Citizen anticipates that QCTO may seek to resist disclosure of certain categories of record — in particular internal deliberative material — by reliance on section 44, which permits (but does not require) refusal of records containing "an opinion, advice, report or recommendation obtained or prepared ... for the purpose of assisting to formulate a policy or take a decision." Safe Citizen records, in advance, that: (a) section 44 is a discretionary, not a mandatory, ground, and QCTO must apply its mind afresh to whether withholding is justified in each instance, not adopt a blanket refusal; (b) to the extent QCTO or DHET have already substantively progressed, adopted, or acted upon any plan of the kind described in Part C above — including by commissioning PFTC to design the re-aligned qualification, or by any engagement already had with SAPS or the SAPS Training Division — the deliberative process said to justify withholding has, on QCTO's own conduct, already moved well beyond the tentative policy-formulation stage that section 44 is designed to protect; and (c) section 46 requires that, "despite any other provision of this Chapter," a public body's information officer "must grant a request" for access — even where a discretionary ground would otherwise apply — where the record would reveal evidence of "a substantial contravention of, or failure to comply with, the law" or "an imminent and serious public safety ... risk," and the public interest in disclosure clearly outweighs the harm contemplated by the ground relied upon. Safe Citizen's position is that both limbs of section 46 are squarely engaged here: a failure to conduct a legally required Socio-Economic Impact Assessment before proceeding with a significant regulatory transition is, on Safe Citizen's case, a failure to comply with an applicable governance requirement; and a training-quality-assurance transition affecting the competency standard for firearm handling in South Africa is, on its face, a matter of public safety. Safe Citizen calls upon QCTO's Information Officer to apply section 46 accordingly, and to explain in writing, with reference to specific records, any refusal that does not.

7.8 Should this application be refused, in whole or in part, or should QCTO fail to respond within the periods prescribed by sections 25 and 26, Safe Citizen expressly reserves its rights to pursue any internal appeal available to it under sections 74 to 77 of the Act, and thereafter, or in the alternative, to apply to a competent court under section 78 for appropriate relief, including an order compelling production of the records sought.

PART E: SCHEDULE OF RECORDS REQUESTED

8. Safe Citizen requests access to the following records, held by QCTO and, to the extent held by DHET, SASSETA, SAQA, SAPS or the Central Firearms Registry and shared with or accessible to QCTO, by those bodies respectively:

8.1 All records — including concept documents, draft policies, internal proposals, business cases, costings, memoranda, presentations, and Board, Council or Executive Committee minutes or resolutions — evidencing whether QCTO and/or DHET have under consideration, or have adopted, any plan whose effect would be to remove, transfer, reduce, dilute, or decline to renew or extend, PFTC's custodianship of qualification 50480 or its re-aligned successor qualification.

8.2 All records evidencing consideration of, or an intention to establish, an internal QCTO unit, division or capability to perform the quality-assurance function currently performed by PFTC, including any record showing that such a function would be established, staffed, seconded, trained, resourced or otherwise materially underpinned by the SAPS Training Division or any other component of the South African Police Service.

8.3 All correspondence, in whatever form (including email, letter, minute, or memorandum), between QCTO and/or DHET on the one hand, and SAPS, the SAPS Training Division and/or the Central Firearms Registry on the other, relating to qualification 50480, its successor qualification, or the future custodianship of either, from 1 January 2024 to the date of this application.

8.4 Minutes, agendas and resolutions of any QCTO Board or Council meeting, QCTO Executive Committee meeting, or DHET meeting, at which qualification 50480, its successor qualification, or PFTC's custodianship of either was discussed, from 1 January 2024 to the date of this application.

8.5 Any Socio-Economic Impact Assessment, regulatory impact assessment, or comparable analysis conducted in respect of the transition contemplated by Government Gazette No. 54992 or the future custodianship of qualification 50480, alternatively, if no such assessment exists, written confirmation of that fact and the reasons why none was conducted.

8.6 All records evidencing the process, criteria and reasoning by which the qualification published under Government Gazette No. 54992 was developed, including the terms on which PFTC was commissioned to design it, and any subsequent decision, or proposed decision, regarding who would administer or quality-assure it.

8.7 Any performance review, audit, complaint record, or formal or informal evaluation of PFTC's discharge of its custodianship of qualification 50480, whether favourable or unfavourable, relied upon or considered in connection with any proposal to change that custodianship.

8.8 All records evidencing what dissemination steps, if any, were taken to bring Government Gazette No. 54992 to the attention of affected stakeholders beyond gazettal itself, and any consideration given to, or decision taken on, extending the public comment period.

8.9 All records evidencing SAPS's and/or the Central Firearms Registry's position on, or involvement in, determining equivalence between the historical unit-standard regime and any proposed skills-programme regime for purposes of firearm-competence licensing under the Firearms Control Act 60 of 2000.

8.10 The current version of QCTO's PAIA Manual maintained in terms of section 51 of the Act, and the name, title and contact details of QCTO's currently appointed Information Officer and any Deputy Information Officer, for confirmation against the version publicly available to Safe Citizen as at the date of this application.

8.11 Any legal opinion, advice or memorandum obtained by QCTO and/or DHET concerning the lawfulness of transferring custodianship of qualification 50480, or any successor qualification, to an internal QCTO structure, or to a structure underpinned by SAPS or the SAPS Training Division — save that, to the extent any such record is validly protected by legal professional privilege, Safe Citizen requests, in the alternative, a schedule or index of such records sufficient to identify their existence, date, and general subject matter, consistent with QCTO's obligations when relying on a ground for refusal.

8.12 All records evidencing the basis, terms, and any conditions attached to the extension of qualification 50480 to December 2028, including any undertaking given by QCTO or DHET, to any party, as to the process to be followed before that date.

PART F: REQUESTER PARTICULARS AND FORM OF ACCESS

9. The particulars required to identify the requester, and the form of access sought, are as follows:

Requester	Safe Citizen (Safe Citizen Campaign, Reg. No. 2020/806087/08)
Represented by	Jonathan K. F. Deal, Founder and Leader
Postal address	Gecko Rock Private Nature Reserve, Touwsrivier, 6880
Contact	Jonathan.deal@safecitizen.co.za 076 838 5150
Transmitted via	Safe Citizen's attorneys of record: Gillan & Veldhuizen Inc. Tel: +27 21 701 1890 Fax: +27 21 702 0212 Email: pj@gvinc.co.za Westlake Office Suite B6 & B15 Westlake Square, Westlake Drive Westlake, Cape Town
Form of access requested	Electronic copies (PDF or native format) of all records identified in Part E, transmitted to Safe Citizen's attorneys of record at the address above
Language preference	English

PART G: RESPONSE AND DELIVERY

10. QCTO's written decision on this application, and any records to which access is granted, must be delivered to Safe Citizen's attorneys of record at the address given in Part F above, within the period prescribed by section 25 of the Act, alternatively any lawfully extended period properly notified under section 26.

11. Nothing in this application constitutes a waiver of any right available to Safe Citizen, PFTC, or any other affected stakeholder, whether under PAIA, the Promotion of Administrative Justice Act 3 of 2000, the common law, or the Constitution. All such rights are expressly reserved, including the right to challenge any refusal, purported extension, or failure to respond, by way of internal appeal, application to court under section 78 of PAIA, or any other lawful remedy.

12. Safe Citizen records, finally, that it brings this application reluctantly and only because more than two months of direct, specific and repeated engagement have produced no answer of any kind. Safe Citizen would still prefer a considered, substantive written response addressing the matters raised in this application and in its predecessor correspondence, in place of — or in addition to — the production of records sought here. That door remains open. It will not, however, remain open indefinitely, and Safe Citizen will pursue this matter, in the public interest, through every lawful avenue available to it for as long as it takes to obtain a straight answer.

Yours faithfully,



Jonathan Deal

Founder and Leader, Safe Citizen

Per: [ATTORNEYS OF RECORD]

Transmitted on Safe Citizen's behalf and by electronic mail, and delivered to QCTO by courier