The Road Freight Association
Without Trucks, South Africa Stops!
Reg. No. 1981/010367/08 Non Profit Company (NPC)

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Dear Mr Ocktoch

Advanced Cargo Declaration (ACD) System

Introduction
The Road Freight Association (RFA) is the recognized national representative body of the road freight industry in the Republic of South Africa. Members operate under road freight Operator cards issued by the various Provincial Departments of Transport.

An Operator card is required where goods are carried in a vehicle or combination of vehicles which gross mass exceeds 3 500 kilograms, or subject to other requirements as stipulated in Regulation 265 of the National Road Traffic Regulations.

The RFA was founded in 1975 with the purpose of representing and promoting the interests of the road freight industry to address matters that affect transport operators on a National, Provincial, Regional and International level.

Our Mission is to promote professionalism, excellence and safety in road transport.

The Road Freight Association (RFA) is a voluntary membership-based organisation that represents the interests of road freight operators in South Africa with membership drawn from the entire industry and represents professional truck operators (Private and Public operators) ranging from owner-drivers, micro, small to large transport fleets.

Members of the Association employ more than 53% of all employees in the freight and logistics sector and therefore negotiates the National Wage Agreement on behalf of all employers in the freight and logistics industry through the principle of Collective Bargaining facilitated by the National Bargaining Council for the Road Freight and Logistics Industry (NBCRFLI).

The RFA has a Code of Conduct that commits Members to the highest standards of professionalism that protects the image, credibility and sustainability of the road freight industry.

RFA Members are required to comply with the standards of professional practice around social and environmental commitment, regulations and legislation, ethics and governance, vehicle roadworthiness, loads, operating efficiency, employees, drivers, safety and standards.

Our Objectives are to:

- Add value in a sustainable and professional manner to the road freight industry;
- Provide a collective voice for industry, thus representing the needs and interests of all road freight transport operators;
- Pool resources for the road freight transport industry, thus empowering Members to tackle issues that they cannot handle on an individual basis;
- Support the establishment and growth of small businesses;
- Ensure that the industry is aligned with the value system of the country; and
- Encourage the commitment of members to core values and standards.

A world of digitised cross-border freight movement

Africa is on the way to digitalisation and the AfCFTA in a true and measurable way.

We are excited that our brothers in Kenya, through the Kentan Revenue Authority (KRA) announced on, 14 July, that Kenya will require all inbound containerised cargo to meet the requirements of the Advance Cargo Declaration (ACD) Platform, from 03 August 2026.

Whilst there seems to be some panic – this is unfounded as the system (pre-clearing) already happens in South Africa, and importers (or exporters as the case may be) **who are Accredited Economic Operators (AEO) will have no problem in meeting these requirements** and in obtaining the necessary documentation / information for smooth movement of cargo.

SARS has repeatedly asked the players in the import and export sector to register in the AEO programme – and road freight has led the registration with close to 90% of road freight transporters (called remover of goods in SARS parlance) having registered.

The decision by the KRA signals the positive determination by member African states to embrace each other in the move to ensure efficient, timely and the easier flow of freight through various territories.

The Botswana Unified Revenue Service (BURS) made a similar announcement recently. This means the pieces are beginning to come together.

This means – more than ever – that all parties to the transaction in the movement of a goods shipment must comply – AEO being a very big leap in ensuring "all the correct blocks will be ticked".

Overall, the alignment across the African Continent around the pre-arrival notification and finalisation of customs procedures prior to departure is a welcome development. This is in line with the WCO SAFE Framework of Standard instrument developed by the WCO and therefore supports the standardisation of processes and procedures within a global standard established by the World Customs Organization (WCO) to secure and facilitate international supply chains.

It is however critical that this process is implemented with a clear digitization strategy and approach to allow the flow of information and data through the supply chain process to enable trade facilitation and not become an unintended non-tariff barrier.

The process followed by SARS by creating a public/private co-creation technical working group has delivered successful results both for the Customs authority as well as trade and created a win/win scenario with substantial benefits experienced by both parties.

Even though the new process targets sea cargo, it hits inland hauliers directly.

Containers moving from City Deep to SA ports for export to Kenya will need the Advance Cargo Declaration (ACD) code endorsed on the Bill of Lading before loading — meaning documentation must be finalised before the truck even leaves the depot.

Any delays or overlapping and additional data requirements in that process risks delays at the port and disrupted turnaround for hauliers which leads to additional costs.

Concerns around the time set for implementation

a) Three weeks is a very tight window for a mandatory new digital system.

The Association requests that a wider consultation and onboarding process with key industry role players (such as the RFA) takes place with a phased rollout with limited targeted role players to allow for teething problems to be resolved before an industry wide roll out and adoption.

Without one, containers dispatched without a valid ACD code risk being held at loading or on arrival in Kenya — meaning demurrage, storage costs, and trucks stuck waiting on return loads, which by nature is not a desired process

Is the KRA open to a limited pool of industry players to do end-to-end testing with KRA prior to the initial roll out to ensure that both the process and data exchange is fundamentally sound and can be adopted by the industry?

b) With Zambia, Botswana and now Kenya all introducing similar systems with little consultation, this pattern risks acting as a non-tariff barrier - regardless of intent.

The Association urges that a coordinated regional standard be implemented/agreed to – not each country building its own platform.

The points highlighted above should be considered including joint technical working groups, industry participation in testing and limited activation prior to full industry onboarding.

Cross-border road transporters already contend with congestion at borders like Beitbridge, Kazungula, and Chirundu, plus port access delays at Durban and elsewhere.

Layering on another mandatory digital pre-clearance step — with a new platform, new registration requirements, and a narrow compliance window — risks adding friction rather than the “faster clearance” KRA is promising, at least in the short term while the industry adjusts.

Efficiency gains only materialise after proper testing, agent training, and interoperability with existing systems (e.g., existing customs/clearing agent software) and wide industry consultation and onboarding through a carefully crafted and managed activation strategy and plan.

The path forward to ensure success of the ACD Programme
The Association strongly supports digitization and simplification initiatives and welcomes this initiative from KRA, but the stated benefits can easily become obsolete if this process is activated and roll out without industry readiness and adoption being aligned to the timeliness and requirements.

The only question to be answered is whether through the interactions between various Customs Authorities in the region will uniformly accept AEO as the unifying platform to ensure minimal duplicate processes and true visibility and accreditation across the customs region.

The Association looks forward to your comment and is willing to assist the KRA in this important journey which will affect both the consumer communities across the African region as well as those in volved in the logistics chains.

Further queries or communication can be forwarded to the Association.

Yours Sincerely

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