DEPARTMENT OF TRANSPORT

PUBLICATION OF DRAFT ROADS POLICY FOR SOUTH AFRICA FOR PUBLIC COMMENTS

I, Mr M.J Maswanganyi, MP, Minister of Transport, hereby publish the Draft Roads Policy for South Africa for public comments.

Interested parties and organisations are invited to submit to the Acting Director – General: Department of Transport, within (30) days of the publication of this notice in the gazette, written representations or comments of the Draft Roads Policy for South Africa at the following:

By Post: Attention: Mr Moshe Ramotshwane
The Acting Director General
Department of Transport
Private Bag X 193
PRETORIA
0001

By hand: Ground floor of the Department of Transport, Forum Building marked for attention of Mr Moshe Ramotshwane.

By email: ramotsm@dot.gov.za

Any enquiries in connection with the Draft Roads Policy for South Africa can be directed to Mr Moshe Ramotshwane at 012 309 3036.

Mr M.J. Maswanganyi, MP
Minister of Transport
Date: 22 February 2018
DRAFT ROADS POLICY FOR SOUTH AFRICA

December 2017
FOREWORD

The core responsibility of South Africa’s National Department of Transport (DoT) is to support the development an efficient, integrated transport system, through putting in place appropriate policies, regulations and models that are both implementable and sustainable by our Road Authorities, within all three spheres of Government.

Road Authorities in South Africa have the obligation to provide a reliable, effective, efficient and integrated transport system that supports the sustainable economic and social development objectives of the country. All Road Authorities also have an obligation to plan, design, construct and maintain the road network, to protect the public investment in the road infrastructure, to ensure the continued functionality of the transportation system, and to promote the safety of traffic on the road network.

The proposed Roads Policy for South Africa sets out the strategic position of National Government on all matters relating to road regulation, roads infrastructure, road safety road funding and Non-motorised Transport (NMT). It does not attempt to address operational matters, except for road safety (which requires a systems approach and thus operational matters are also considered).

With mounting concerns over climate change and air pollution, the role of roads needs to shift away from serving predominantly private vehicles and road-based freight, toward supporting more integrated mobility systems centred on walking, cycling, public transport and freight via rail or sea. In light of this, South Africa needs to ensure that its roads policies make best use of infrastructure budgets to further economic, social and environmental goals simultaneously.

Our country’s National Development Plan (NDP 2030) identifies road infrastructure as a key driver of the South African economy. For this reason, our road network must be developed and maintained in such a way that it supports our national development objectives. In addition, our roads must be managed as assets, and placed in the hands of the appropriate Roads Authority. Our roads must be safe, provide a high level of service at a cost our nation is able to afford, accessible for all users, and maintained in a good condition.

This Roads Policy is the first of its kind in South Africa. Although a series of transport and roads strategies and plans have been developed since 1994 (in particular the White Paper on National Transport Policy), the management of the roads environment and its users has not been fully addressed within an overarching national policy for roads. This Roads Policy therefore provides the necessary overarching framework to ensure that South Africa’s roads are better managed, safer, and includes all modes, to deliver a sustainable approach to roads management.

I hereby present the proposed Roads Policy for South Africa and now look forward for robust engagement with the various stakeholders. I trust that through their inputs and participation, the development of the Roads Policy can be finalised and tabled at Cabinet for approval and implementation.

Mr M. J. Maswanganyi, MP
Minister of Transport
<table>
<thead>
<tr>
<th>TABLE OF CONTENTS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>FOREWORD</td>
<td>2</td>
</tr>
<tr>
<td>II EXECUTIVE SUMMARY</td>
<td>6</td>
</tr>
<tr>
<td>III ACRONYMS AND ABBREVIATIONS</td>
<td>8</td>
</tr>
<tr>
<td>IV GLOSSARY</td>
<td>11</td>
</tr>
<tr>
<td>1 INTRODUCTION</td>
<td>13</td>
</tr>
<tr>
<td>1.1 BACKGROUND</td>
<td>13</td>
</tr>
<tr>
<td>1.2 ROLE OF THE DEPARTMENT OF TRANSPORT.</td>
<td>14</td>
</tr>
<tr>
<td>2 PROBLEM STATEMENT</td>
<td>16</td>
</tr>
<tr>
<td>3 EXISTING POLICY ENVIRONMENT</td>
<td>18</td>
</tr>
<tr>
<td>3.1 RISFA</td>
<td>19</td>
</tr>
<tr>
<td>3.1.1 The Road Network</td>
<td>20</td>
</tr>
<tr>
<td>3.1.2 Road Condition</td>
<td>20</td>
</tr>
<tr>
<td>3.2 WHITE PAPER ON NATIONAL TRANSPORT POLICY</td>
<td>19</td>
</tr>
<tr>
<td>3.3 DRAFT NMT POLICY</td>
<td>20</td>
</tr>
<tr>
<td>3.4 ROAD SAFETY STRATEGIES</td>
<td>20</td>
</tr>
<tr>
<td>3.5 TECHNICAL NORMS, MANUALS, STANDARDS AND GUIDELINES APPLICABLE TO THE ROADS SECTOR</td>
<td>21</td>
</tr>
<tr>
<td>3.6 SUSTAINABILITY – AN UNDERLYING PRINCIPLE TO ROADS MANAGEMENT</td>
<td>21</td>
</tr>
<tr>
<td>3.6.1 The Sustainability Policy Framework</td>
<td>21</td>
</tr>
<tr>
<td>3.6.2 Implications For The Roads Policy For South Africa</td>
<td>22</td>
</tr>
<tr>
<td>4 FRAMEWORK FOR A ROADS POLICY</td>
<td>26</td>
</tr>
<tr>
<td>4.1 VISION</td>
<td>26</td>
</tr>
<tr>
<td>4.2 GOAL</td>
<td>26</td>
</tr>
<tr>
<td>4.3 OBJECTIVES</td>
<td>27</td>
</tr>
</tbody>
</table>
5 ROADS INFRASTRUCTURE ........................................................................................................... 28
  5.1 INSTITUTIONAL RELATIONSHIPS ....................................................................................... 28
      5.1.1 Policy Statements for Improved Institutional Relationships .................................... 29
  5.2 MANAGEMENT OF ROADS INFRASTRUCTURE ................................................................. 31
      5.2.1 Policy Statements on the Management of Roads Infrastructure .................................. 32
  5.3 TECHNICAL CAPACITY ..................................................................................................... 36
      5.3.1 Policy Statements to improve technical capacity ........................................................ 36
  5.4 EMPLOYMENT CREATION ................................................................................................ 37
      5.4.1 Policy Statements to promote Employment Creation .................................................. 38
  5.5 RESPONDING TO USER NEEDS .......................................................................................... 39
      5.5.1 Rural Access ................................................................................................................ 39
      5.5.2 Policy Statements to address needs in the rural areas .................................................. 39
      5.5.3 Public Transport .......................................................................................................... 40
      5.5.4 Policy Statements to respond to the needs of Public Transport users .......................... 40
      5.5.5 Freight Movement ........................................................................................................ 41
      5.5.6 Policy Statements to address the needs of the Freight Sector ..................................... 41
      5.5.7 Regional Integration within SADC ............................................................................. 43
      5.5.8 Policy Statements to improve regional integration within the SADC region ............... 44

6 ROAD SAFETY .......................................................................................................................... 45
  6.1 BACKGROUND ..................................................................................................................... 45
  6.2 EXTENT OF CRASHES AND FATALITIES IN SOUTH AFRICA ........................................ Error! Bookmark not defined.
  6.3 PREVIOUS ROAD SAFETY STRATEGIES AND POLICIES ............................................. Error! Bookmark not defined.
  6.4 ROAD SAFETY PROBLEM STATEMENT ........................................................................ Error! Bookmark not defined.
  6.5 AIMS OF THE ROAD SAFETY POLICY .............................................................................. Error! Bookmark not defined.
  6.6 GUIDING PRINCIPLES FOR THE DEVELOPMENT OF A ROAD SAFETY POLICY .... Error! Bookmark not defined.
  6.7 ROAD SAFETY IMPLEMENTATION AREAS – POLICY STATEMENTS ............................. Error! Bookmark not defined.
      6.7.1 Policy Statements to improve Road Safety Management ............................................ Error! Bookmark not defined.
      6.7.2 Policy Statements to address the role of Law Enforcement ........................................ Error! Bookmark not defined.
      6.7.3 Policy Statements to improve the Collection of Crash Data ....................................... Error! Bookmark not defined.
      6.7.4 Policy Statements to minimize crashes as far as possible from an engineering perspective Error! Bookmark not defined.
      6.7.5 Policy Statement to address the road user culture in South Africa ............................... Error! Bookmark not defined.
      6.7.6 Policy Statement to improve research being undertaken on road safety ........................ Error! Bookmark not defined.
6.8 ROAD SAFETY POLICY IMPLEMENTATION FRAMEWORK AND WAY FORWARD

7 NON-MOTORISED TRANSPORT

7.1 POLICY AND LEGISLATIVE FRAMEWORK FOR NMT

7.2 WHY DO WE NEED NATIONAL POLICY ON NMT?

7.3 NMT VISION AND OBJECTIVES

7.4 REGULATION, INSTITUTIONAL ARRANGEMENTS AND GOVERNANCE
  7.4.1 Policy statements for Regulation, Institutional Arrangements and Governance

7.5 INTEGRATED TRANSPORT AND LAND USE
  7.5.1 Policy Statements on Integrated Transport and Land Use

7.6 SOCIAL HEALTH AND ECONOMIC OPPORTUNITIES
  7.6.1 Policy Statements on Social Health and Economic Opportunities

7.7 ROAD SAFETY
  7.7.1 Policy Statements on Road Safety

7.8 ENVIRONMENTAL SUSTAINABILITY
  7.8.1 Policy Statements for Environmental Sustainability

8 FUNDING
  8.1 Policy Statements to increase funding opportunities and availability

8.2 Policy Statements to increase funding opportunities and availability for the Non-motorised Transport sector

8.3 Policy Statements to increase funding opportunities and availability for the Road Safety sector

9 LEGAL FRAMEWORK
  9.1 Policy Statements to address the Legal Framework

10 MONITORING AND EVALUATION
   10.1 Policy Statements to improve Monitoring and Implementation in the Roads Sector

11 WAY FORWARD
   11.1 POLICY IMPLEMENTATION PRIORITIES

   11.2 CONCLUSION

ANNEXURE A: TECHNICAL MANUALS, NORMS AND GUIDELINES
II EXECUTIVE SUMMARY

South Africa faces many developmental obstacles, including infrastructure bottlenecks, and economic and social challenges such as unemployment, poverty and inequity. Economic infrastructure, including South Africa’s road network, is one of the key levers for economic growth. Roads infrastructure is able to deliver a higher economic return on investment than any single other type of infrastructure. Road transportation is an important industry in the country’s economy, yet various challenges inhibit the sector’s contribution to South Africa’s economic and social development objectives. One such challenge is the roads implementation and maintenance backlog, where increased roads use, low investment, and poor maintenance have led to higher transportation costs and transport bottlenecks.

The effective design, construction and maintenance of roads is crucial to a well-functioning and prosperous modern economy. Roads also play a role in meeting societal needs for connection and mobility in ever-expanding human settlements, and their construction and on-going maintenance provides opportunities to address social challenges like unemployment. With mounting concerns over climate change and air pollution, the role of roads needs to shift away from serving predominantly private vehicles and road-based freight, toward supporting more integrated mobility systems centred on walking, cycling, public transport and freight via rail or sea. These have implications for the Roads Policy for South Africa, which should be aligned with the overall national sustainable objectives.

South Africa is currently experiencing many challenges within the roads sector and the aim of the Roads Policy for South Africa is to, amongst others, provide a regulatory framework for a coherent and uniform response across all spheres in government to respond to the issues experienced.

With a Vision Statement of "Transport, the Heartbeat of Economic Growth and Social Development" the Roads Policy for South Africa has the following broad objectives:

- Alignment with national developmental priorities
- Provide an over-arching policy that covers all aspects of the road sector and applies to all three spheres of government
- Prescribe national principles, requirements, guidelines, frameworks and national norms and standards that can be applied uniformly in provinces and municipalities
- Determine responsibilities, applicability and scope for the various role-players
- Identify and implement institutional reform regarding governance structures in the road sector
- Determine financial options in the road infrastructure investments, road safety, non-motorised transport sectors resulting in enabling mechanisms to implement programmes and projects
- Provide policy certainty with clear and concise regulatory framework for roads management
- Integration of plans for stream-lined and integrated service-delivery
- Increased jobs and skills development
- Integration of NMT as a recognised mode in the transport system
- Clear national directive on addressing road safety
- Directives for monitoring, evaluation and reporting in the roads management environment

Highlights of the Roads Policy include addressing the institutional relationships between the various Road Authorities, which play a significant role in the functioning of the road management environment. This will result in reducing and eliminating un-proclaimed roads and assign responsibilities on road ownership and mandates.
In support of an approach to sustainability within the roads management sector, South Africa is charged with developing a more 'green' road network, integrated with land use in urban areas to encourage the development of more sustainable urban forms. The Roads Policy promotes compliance with the Committee of Transport Officials (COTO) technical policies and standards and charges all Road Authorities to maintain the integrity of the road reserve. Policies are proposed to address this challenge and promote the professionalisation of engineers and engineering technologists within management levels at Road Authorities. Policies are also introduced in support of sustainable transport management.

Road users are reliant on a safe and efficient road network. Roads must be developed and maintained taking into consideration the marginalisation of rural communities due to the state of access roads. Public transport users using buses and taxis are also reliant on a sound road network and public transport services across South Africa requires roads to be developed and maintained in such a manner to further the use of public transport. Freight is a major contributor to economic the South African economy and requires an efficient transport system.

Road safety has reached catastrophic proportions and South Africa is one of the 182 member states that supports the United Nations Decade of Action for Road Safety. There is in general a limited understanding of the complexity of the road safety problem in South Africa, which includes lawlessness, lack of equitable access to suitable infrastructure, inadequate law enforcement and fragmented road safety education. Road safety requires a long-term view with a multi-disciplinary approach and exceptional, consistent leadership. The Department has developed the Road Safety Strategy to provide a strategic framework for the implication of road safety initiatives. The Roads Policy provides the policy environment for the successful implementation of the strategy.

Traditionally, transport has been planned around the private vehicle user, resulting in the majority of road users, the pedestrians, not having access to equitable infrastructure. NMT is a viable and sustainable alternative to the use of private vehicles. It is accepted that NMT is an important potential transport solution for our country. NMT has many health and economic benefits, but the fact that it has zero carbon emissions aligns well with the global call for climate change. A range of definitive actions will need to be taken at various levels of government to ensure NMT achieves its rightful status in South Africa's transport system. Policy statements in support of furthering NMT have been developed to raise awareness for NMT as a sustainable mode of transport.

Inadequate funding for road infrastructure implementation and maintenance is a common refrain. Without significant investment in roads this significant asset will continue to deteriorate. Funding roads through other possibilities will most likely close the gap between the road budgetary requirements and the available funding. Other funding sources that could be considered include the fuel levy, vehicle licence fees, tolling and potentially other innovative funding sources; all towards developing an integrated funding model. Policy proposals include a focus on improving the efficiencies in budget expenditure in the roads sector and government support for the application of the user-pay principle (for example tolling, congestion charges, weight over distance charging, cross-boarder levies, etc.), where required and adopted and the development of an integrated funding model. The maintenance needs of municipal roads and streets and the role of the private sector within the delivery of roads are also focus areas for policy interventions.

As part of a more sustainable approach to roads management, performance evaluation, especially in meeting sustainability targets, has been identified as a focus area in the Roads Policy. The Roads Policy for South Africa is a further key tool in accelerating economic growth towards accomplishing the objectives of the National Development Plan (NDP 2030).
III ACRONYMS AND ABBREVIATIONS

AARTO  Administrative Adjudication of Road Traffic Offences
ADV    Animal-Drawn Vehicle
ARDP   Access Road Development Plan
BRT    Bus Rapid Transit
CBRTA  Cross-Border Road Transport Agency
CCTV   Closed-Circuit Television
CIDB   Construction Industry Development Board
COGTA  Department of Cooperative Governance and Traditional Affairs
COTO   Committee of Transport Officials
DBSA   Development Bank of South Africa
DPLG   Transport and Department of Local Government
DORA   Division of Revenue Act
DoT    Department of Transport
ECSA   Engineering Council of South Africa
eNaTIS Electronic National Traffic Information System
EPWP   Expanded Public Works Programme
GFIP   Gauteng Freeway Improvement Project
GHG    Greenhouse Gas
HHVs   Heavy-haul vehicles
HVs    Heavy vehicles
ICT    Information and Communications Technology
IPTN   Integrated Public Transport Networks
IRPTN  Integrated Rapid Public Transport Networks
IRTAD  International Road Traffic and Crash Database Group
ITP    Integrated Transport Plan
ITS    Intelligent Transport Systems
KPI Key Performance Indicator
MIG Municipal Infrastructure Grant
MINMEC Ministers and Members of Executive Councils
MRMG Municipal Road Maintenance Grant
MSA Municipal Structures Act
MTEF Medium Term Expenditure Framework
NERSA National Energy Regulator of South Africa
NDP National Development Plan 2030
NGO Non-governmental organisation
NMT Non-motorised Transport
NLTA National Land Transport Act
NRMP National Roads Master Plan
NRSC National Road Safety Council
OSD Occupation Specific Dispensation
PFMA Public Finance Management Act
PLTF Provincial Land Transport Framework
PMS Pavement Management System
PPP Public Private Partnership
PRASA Passenger Rail Agency of South Africa
PRMG Provincial Road Maintenance Grant
PSCBC Public Service Coordinating Bargaining Council
PSC Project Steering Committee
RAMS Road Asset Management System
RRAMS Rural Road Asset Management Systems
RCB Roads Coordinating Body
RIMS Road Incident Management Systems
RISDP Regional Indicative Strategic Development Plan
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>RISFSA</td>
<td>Road Infrastructure Strategic Framework for South Africa</td>
</tr>
<tr>
<td>RSR</td>
<td>Rail Safety Regulator</td>
</tr>
<tr>
<td>RTMC</td>
<td>Road Traffic Management Corporation</td>
</tr>
<tr>
<td>RTS</td>
<td>Road Traffic Safety</td>
</tr>
<tr>
<td>SAATCA</td>
<td>Southern African Auditor and Training Certification Association</td>
</tr>
<tr>
<td>SABS</td>
<td>South African Bureau of Standards</td>
</tr>
<tr>
<td>SACPCMP</td>
<td>South African Council for Project and Construction Management Professions</td>
</tr>
<tr>
<td>SADC</td>
<td>Southern African Development Community</td>
</tr>
<tr>
<td>SALGA</td>
<td>South African Local Government Association</td>
</tr>
<tr>
<td>SANAS</td>
<td>South African National Accreditation System</td>
</tr>
<tr>
<td>SANRAL</td>
<td>South African National Roads Agency SOC Limited</td>
</tr>
<tr>
<td>SAPS</td>
<td>South African Policy Service</td>
</tr>
<tr>
<td>SARF</td>
<td>South African Roads Federation</td>
</tr>
<tr>
<td>SIP</td>
<td>Strategic Infrastructure Project</td>
</tr>
<tr>
<td>STER</td>
<td>Single Transport Economic Regulator</td>
</tr>
<tr>
<td>SSP</td>
<td>S’hamba Sonke Programme</td>
</tr>
<tr>
<td>TDM</td>
<td>Travel Demand Management</td>
</tr>
<tr>
<td>TOD</td>
<td>Transit Oriented Development</td>
</tr>
<tr>
<td>TFR</td>
<td>Transnet Freight Rail</td>
</tr>
<tr>
<td>TMH</td>
<td>Technical Methods for Highways</td>
</tr>
<tr>
<td>TRH</td>
<td>Technical Recommendations for Highways</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION OR EXPLANATION</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Animal-Drawn Transport</td>
<td>A form of transport that is provided by a vehicle or device, using two or more wheels and drawn by one or more working animals such horse, donkey, ox or mule, designed for transport.</td>
</tr>
<tr>
<td>Equitable Share Contributions</td>
<td>The equitable share is an unconditional budget allocation to the national, provincial and local government.</td>
</tr>
<tr>
<td>Freight consolidation</td>
<td>Cargo consolidation service provided by a freight forwarder in which several smaller shipments are assembled and shipped together to avail of better freight rates and security of cargo.</td>
</tr>
<tr>
<td>Funding cycles</td>
<td>The sequence of activities involved in the process of awarding a grant.</td>
</tr>
<tr>
<td>Infrastructure Service Delivery Toolkit</td>
<td>The Toolkit provides a documented body of knowledge and set of processes that represent generally recognised best practices in the delivery management of infrastructure. It is focused on the delivery and life cycle management of South African public sector infrastructure. The target users for this Toolkit include both technical and non-technical managers.</td>
</tr>
<tr>
<td>Inter-modal freight transport</td>
<td>Intermodal freight transport involves the transportation of freight in an intermodal container or vehicle, using multiple modes of transportation (rail, ship, and truck), without any handling of the freight itself when changing modes.</td>
</tr>
<tr>
<td>Logistic chain</td>
<td>Logistics management is that part of the supply chain, which plans, implements and controls the efficient, effective forward and reverse flow and storage of goods, services, and related information between the point of origin and the point of consumption in order to meet customer requirements. Logistic chain refers to all successive steps comprising a logistic-process in a particular environment or industry.</td>
</tr>
<tr>
<td>Logistics hub</td>
<td>Logistics hubs are generally defined as integrated centres for trans-shipment, storage, collection and distribution of goods.</td>
</tr>
<tr>
<td>Modal shift</td>
<td>Modal shift refers to a move away from one form of transport to another. Usually used in the context of sustainable transport planning where a shift towards more environmentally friendly modes (public transport, NMT and rail) is promoted.</td>
</tr>
<tr>
<td>Non-motorised Transport</td>
<td>Non-motorised transport or transport by any means other than a motor vehicle including, but not limited to, walking, cycling and animal-drawn vehicles and wheelchairs. NMT infrastructure includes bicycle paths, walkways, public open spaces and other buildings and structures used or intended for, or to promote NMT.</td>
</tr>
<tr>
<td>Planning Authority</td>
<td>In terms of the National Land Transport Act of 2009 a planning authority refers to a municipality in relation to its planning function</td>
</tr>
<tr>
<td>Occupation Specific Dispensation</td>
<td>In 2007, Occupational Specific Dispensation (OSD) was introduced for public sector employees in South Africa, which is unique to each identified occupation in the public service. PSCBC Resolution 1 of 2007 provided the framework for occupational specific remuneration and career progression dispensations to address unique conditions.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION OR EXPLANATION</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Rail-friendly commodities</td>
<td>Goods such as bulk commodities including coal, chrome and manganese, automotive parts and components, containers and chemicals are deemed to be rail-friendly due to their mass and volume.</td>
</tr>
<tr>
<td>S’hamba Sonke Programme</td>
<td>The S’hamba Sonke programme provides a set of principles to guide the prioritisation of infrastructure investments to maximise the economic impact and development multipliers for maintaining and upgrading South Africa’s provincial road network.</td>
</tr>
<tr>
<td>Small-wheeled transport</td>
<td>Includes wheeled luggage, walkers, skates, skateboards, push scooter, Segway, handcarts, wheel barrows and wagons. Wheeled luggage increases the amount of baggage that pedestrian can reasonably carry and expands reasonable walking distances.</td>
</tr>
<tr>
<td>Travel Demand Management</td>
<td>Transportation Demand Management (TDM) (also known as Mobility Management) is a general term for various strategies that increase transportation system efficiency. It emphasizes the movement of people and goods, rather than motor vehicles, and so gives priority to more efficient modes (such as walking, cycling, ridesharing, public transit and telework), particularly under congested conditions.</td>
</tr>
<tr>
<td>Universal design</td>
<td>Universal design is an approach to create an environment that meets the needs of all potential users to the greatest extent possible. Taking into consideration the diverse abilities of individuals, such as agility, balance, cognition, coordination, endurance, flexibility, hearing, problem solving, sensory processing capacity, strength, vision, and walking speed; it emphasises inclusive design that ensures participation and access for all.</td>
</tr>
</tbody>
</table>