



Commission for Gender Equality
A society free from gender oppression and inequality

SUBMISSION: DRAFT NATIONAL RAIL MASTER PLAN

Commission for Gender Equality Comments

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For queries, contact:

Bradley Swanepoel

Legal Research Specialist

Email: Bradley@cge.org.za

Tel: 011 403 7182



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1. Introduction

The Commission for Gender Equality (CGE), established in terms of Chapter 9 of the Constitution of the Republic of South Africa, welcomes the opportunity to comment on the Draft National Rail Master Plan (NRMP).

The CGE supports the strategic intent of the NRMP to revitalise South Africa's rail system as a catalyst for inclusive economic growth, industrialisation, regional integration, and affordable public transport. However, Draft NRMP does not sufficiently integrate gender-responsive planning, budgeting, implementation, monitoring, and accountability mechanisms.

Given South Africa's constitutional commitment to substantive equality in sections 9 and 10 of the Constitution, and the persistent structural exclusion of women, particularly black women, women with disabilities, rural women, and women in informal and low-income employment, the NRMP presents a critical opportunity to transform the transport sector.

The CGE submits that gender equality must be mainstreamed as a cross-cutting principle across all components of rail reform, including restructuring, funding, governance, infrastructure investment, industrialisation, and service delivery.



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2. The CGE's Submissions

2.1 Overarching thematic framework

The NRMP introduces major structural reforms including, separation of infrastructure and operations, third-party and private operator access, commercialisation of rail services, new funding and investment models, and expanded market participation. However, restructuring, privatisation, and commercialisation very often runs the risk of unintentionally deepening gender inequality if safeguards are not embedded. The associated risks include job losses in lower-level occupations where women are concentrated, reduced affordability of passenger rail services affecting low-income women, exclusion of women-owned enterprises from emerging rail markets, and reduced access to transport for caregivers and informal workers

The CGE therefore submits any rail reform cannot be gender-neutral, but instead must be gender-transformative. This would require inclusion of the following into any such framework:

- gender impact assessments for all structural reforms;
- gender-responsive conditions for private operators;
- protection of affordable passenger transport as a public good; and
- mandatory participation of women in new rail market opportunities



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2.2 *Absence of Gender Mainstreaming Framework*

The NRMP does not contain a dedicated gender mainstreaming framework and remains largely gender-neutral in design. The CGE is of the view that the NRMP must include a dedicated Gender Mainstreaming Chapter that aligns with the Constitution, the Promotion of Equality and the Prevention of Unfair Discrimination Act 4 of 2000 (PEPUDA), the National Gender Policy Framework, SDG 5 and SDG 11, and CEDAW and AU Women's Protocols.

2.3 *Governance and representation in the rail system*

There is no structured mechanism that exists to ensure women's representation in rail governance, advisory bodies, or regulatory institutions. In light of this, the CGE is of the view that the NRMP should:

- establish gender parity targets in governance structures;
- ensure women representation in boards, advisory councils, and planning bodies;
- include diverse gender representation in all rail policy and planning teams; and
- embed gender mainstreaming in the proposed National Rail Bill.

2.4 *Gender-responsive funding and budgeting*

The NRMP identifies funding constraints but does not explain how investment benefits women or reduces inequality.



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The CGE is therefore of the view the NRMP must:

- implement Gender Responsive Planning, Budgeting, Monitoring, Evaluation and Auditing (GRPBMEA);
- ensure gender-responsive infrastructure investment allocation;
- track expenditure benefiting women, youth, and persons with disabilities; and
- report annually on gender outcomes of rail spending

2.5 Women's employment and skills development

The rail sector remains heavily male-dominated, particularly in technical, engineering, and leadership roles. In light of this, the NRMP must:

- establish measurable gender employment equity targets;
- reserve at least 50% of skills development opportunities for women;
- include targeted programmes for young women, rural women, and women with disabilities;
- strengthen TVET and SETA partnerships for rail training; and
- introduce mentorship and apprenticeship programmes for women.

2.6 Procurement and women's economic empowerment

The NRMP lacks clear gender-transformative procurement mechanisms. It therefore should:



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- ensure women participation in rail supply chains (manufacturing, maintenance, services)
- track and publish gender-disaggregated procurement data; and
- support women-owned SMMEs in localisation programmes.

2.7 Infrastructure Rehabilitation and Gender-Responsive Design Issue

In the NRMP, infrastructure investment (estimated R70–R125 billion) is framed in technical and economic terms without gender analysis. The CGE submits that all infrastructure projects must include:

- Gender-responsive infrastructure design
- Safe and well-lit station precincts
- Accessible sanitation facilities
- Childcare and caregiver-friendly spaces
- Universal accessibility design standards
- Safe pedestrian routes; and
- last-mile connectivity.

2.8 Transit-Oriented Development (TOD)

The NRMAP includes TOD but does not incorporate women's mobility patterns or care responsibilities. The CGE would argue that TOD planning should include:

- childcare and healthcare facilities;



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- safe public spaces and walkways;
- inclusion of informal trading spaces, especially for women traders; and
- gender-sensitive urban design principles

2.9 Safety and Security in Rail Transport

The CGE submits that because women face high levels of harassment, gender-based violence (GBV), and insecurity in transport environments, the NRMP must implement the following to deal with these issues:

- A gender-responsive rail safety strategy;
- CCTV, lighting, and emergency systems at stations;
- dedicated GBV reporting mechanisms;
- training for rail personnel on GBV prevention;
- safety audits focused on women, children, elderly persons, and persons with disabilities; and
- joint safety coordination with SAPS and local government.

2.10 Affordability and Access

Transport affordability disproportionately affects women due to income inequality and care-related mobility patterns. In light of this, the CGE is of the view that the NRMP should:

- assess gendered impacts of fare structures;
- introduce targeted subsidies for vulnerable women;
- align rail routes with employment, education, healthcare, and informal economic zones; and



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- ensure equitable spatial access to rail services.

2.11 *Universal Accessibility and Inclusion*

The NRMP does not adequately address intersectional exclusion affecting women with disabilities, elderly women, and caregivers. To address these gaps, the NRMP must:

- implement universal design standards;
- ensure full accessibility of stations, trains, and ticketing systems;
- provide caregiver-friendly infrastructure; and
- conduct accessibility audits at all project phases.

3. **Conclusion**

The CGE supports the transformation of South Africa's rail system as a strategic developmental intervention. However, the success of the NRMP depends on its ability to deliver inclusive, equitable, and gender-transformative outcomes.

The CGE therefore recommends that gender equality be embedded as a cross-cutting and measurable principle across all components of the NRMP, supported by clear targets, dedicated funding, gender-responsive budgeting, institutional accountability mechanisms, and ongoing monitoring and reporting.

A gender-responsive rail system will not only improve women's safety, mobility, and economic participation but will also advance South Africa's broader constitutional commitment to substantive equality and inclusive development.