



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

**SUBMISSION: DRAFT TOWNSHIP AND RURAL ECONOMY
DEVELOPMENT AND REVITALISATION POLICY**

June 2026

For queries, contact:

Bradley Swanepoel

Legal Research Specialist

Email: Bradley@cge.org.za

Tel: 011 403 7182



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

Table of Contents

1.	Introduction	3
2.	Background	3
3.	The CGE's submissions	5
4.	Conclusion	10



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

1. Introduction

The Commission for Gender Equality (CGE), established in terms of Chapter 9 of the Constitution of the Republic of South Africa, 1996, welcomes the opportunity to comment on the Draft National Policy for Township and Rural Economy Development and Revitalisation (TREDaR).

In exercising its constitutional mandate to promote and protect gender equality, the CGE evaluates policies to ensure alignment with substantive equality, transformation, and social justice imperatives.

While the TREDaR Policy seeks to address economic exclusion, unemployment, poverty, and inequality in township and rural economies, the CGE remains concerned that gender equality considerations are not sufficiently mainstreamed across the policy architecture. This concern is further reinforced by the CGE's empirical findings contained in its own investigative report.

2. Background

During the 2024/2025 financial year, the CGE investigated women empowerment within the informal economy sector within the City of Tshwane Metropolitan Municipality's informal economy sector. The CGE's investigative findings and recommendations were published in its report entitled *Women empowerment in the informal economic sector within the City of Tshwane Metropolitan Municipality 24/25*.¹ The investigative report provides

¹ Commission for Gender Equality (2025) *Women empowerment in the informal economic sector within the City of Tshwane Metropolitan Municipality 24/25*.



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

critical evidence of persistent structural barriers faced by women in local economic systems, as well as strong empirical evidence relevant to the TREDaR policy framework.

More specifically, the investigation confirmed that the majority of informal traders within the City of Tshwane are women, who rely on informal trading as a primary livelihood strategy due to structural exclusion from formal employment, including unemployment, limited education opportunities, gender discrimination, and unequal access to economic resources.

Key findings in the report include the following:

- Approximately 60% of trading permits issued by the City of Tshwane were allocated to women, predominantly Black African women. Informal trading in the city was therefore a gendered space.
- Women traders operate under precarious and informalised working conditions, including inadequate infrastructure, lack of storage facilities, limited access to ablution facilities, high transport costs, and inconsistent enforcement practices.
- Women face persistent barriers in accessing permits, financial services, business development support, and market opportunities.
- Municipal by-laws and regulatory frameworks are largely gender-neutral, failing to address women's differentiated needs and vulnerabilities.



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

- Enforcement actions such as confiscation of goods, evictions, and permit sanctions disproportionately impact women traders due to their limited capital and lack of social protection.

The CGE accordingly found that formal regulatory compliance does not automatically translate into substantive gender equality or economic empowerment in the informal economy. These findings are directly relevant to the TREDaR policy, which seeks to regulate and support township and rural economies, where informal trading constitutes a central economic activity for women.

3. The CGE's Submissions

In light of the above, the CGE makes the following submissions on TREDaR policy framework:

3.1 *Lack of gender mainstreaming*

Regulatory systems governing informal trading remain largely gender-neutral, with limited integration of gender-responsive planning, implementation, and monitoring. This results in the invisibilisation of women's economic realities despite their numerical dominance in the sector.

The findings of the CGE investigation substantiate and reinforce earlier concerns raised in the TREDaR submission that gender-neutral policy design risks entrenching structural inequality; that women face disproportionate barriers in accessing finance, infrastructure, and markets; that enforcement



Commission for Gender Equality

A society free from gender oppression and inequality

and regulatory systems may produce unintended gendered harm; and that economic inclusion requires targeted, not generic, interventions. This empirical evidence strengthens the case for systematic gender mainstreaming across all components of the TREDaR Policy, including governance, funding, infrastructure, and monitoring frameworks.

3.2 *Inadequate infrastructure and services*

The investigative report found that women traders face a number of challenges including:

- unsafe and inaccessible ablution facilities;
- lack of storage infrastructure;
- poor sanitation and hygiene conditions; and
- exposure to unsafe trading environments.

These conditions undermine dignity, health, safety, and economic productivity, engaging constitutional rights under sections 9 and 10 of the Constitution.

3.3 *Information and permit accessibility barriers*

The CGE's report also found that many women traders often operate without permits due to:

- lack of information on application processes;
- administrative complexity; and
- financial constraints.



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

This increases vulnerability to enforcement actions and income loss.

3.4 *Exclusion from skills development*

Access to municipal support programmes such as skills development is often dependent and conditional on permit status. This has the effect of excluding unpermitted traders, many of whom are women, from business development and training opportunities.

3.5 *TREDaR policy design approach*

The CGE investigation further underscores the need for a transformative, developmental, and gender-responsive policy approach, rather than a narrowly regulatory framework. The TREDaR Policy must therefore be aligned with:

- The right to equality contained in section 9 of the Constitution.
- The right to freedom, trade, occupation and profession contained in section 22 of the Constitution.
- Local government's developmental duties under section 153 of the Constitution along with their constitutional mandate under section 152(1)(c) to promote social and economic development and 153 of the Constitution.
- The Local Government: Municipal Systems Act 32 of 2000.
- The National Strategic Plan on Gender-Based Violence and Femicide.
- Sustainable Development Goal 5 (Gender Equality).
- Sustainable Development Goal 8 (Decent Work and Economic Growth).



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

The CGE emphasises that the aforementioned constitutional provisions, legislation, and other regulatory instruments render it insufficient to simply treat informal traders as regulated economic actors. These provisions require that they must instead be recognised as contributors to local economic development, poverty reduction, and community resilience.

With this in mind, the CGE submits that the following should be included in the policy to give effect to the need for the following:

3.5.1 Gender-responsive objectives and monitoring: Municipal and national by-laws governing informal and township economies must incorporate explicit gender equality objectives. All regulatory instruments should undergo mandatory Gender Impact Assessments prior to adoption or amendment.

3.5.2 Infrastructure and Service Provision: The TREDaR policy should prioritise infrastructure and service provisions such as:

- safe, clean, and accessible ablution facilities;
- secure storage facilities;
- adequate lighting in trading spaces;
- childcare support mechanisms; and
- safe transport and mobility infrastructure for women traders.



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

3.5.3 Economic Empowerment Measures: The TREDaR policy should also strengthen access to:

- micro-finance and credit facilities for women traders;
- market access and supply chain integration;
- business incubation and enterprise development programmes;
- digital literacy and financial management training; and
- procurement opportunities for women-owned informal enterprises.

3.5.4 Capacity Building and Information Access: Implement targeted outreach programmes ensuring that all traders, including unpermitted traders, have access to:

- permit application processes;
- regulatory requirements;
- support programmes; and
- legal rights and obligations within the informal economy.

3.5.5 Gender-Responsive Monitoring and Evaluation: All monitoring systems should collect and publish sex-disaggregated data, including:

- Permit allocation by gender;
- Access to infrastructure and services;
- Participation in skills development programmes;
- Law enforcement actions affecting traders;
- Access to business support services.



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

4. Conclusion

The CGE reiterates its support for the objectives of the Draft National Policy for Township and Rural Economy Development and Revitalisation. However, evidence from the CGE's 2024/25 investigation into women empowerment in the informal economy in the City of Tshwane demonstrates that without explicit gender-responsive design, economic policies risk reproducing exclusionary outcomes even within development-oriented frameworks.

The CGE therefore submits that both the original submission and the Tshwane investigation findings collectively demonstrate the urgent need for:

- a rights-based and developmental approach to informal and township economies;
- structural gender mainstreaming across all policy instruments;
- recognition of women as central economic actors rather than peripheral beneficiaries; and
- alignment with constitutional and international obligations on gender equality.

END