

Compliance Monitor

Register of Projects

Quarter

3

2013



CIDB iTENDER/ROP COMPLIANCE MONITOR; OCTOBER 2013

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The *cidb iTender/RoP Compliance Monitor* provides indicators of the level of compliance and non-compliance with the iTender/Register of Projects by client bodies. These indicators can be used by clients to verify their non-compliance with the *cidb* regulations, and for the *cidb* to support enforcement actions and sanctions.

This *Compliance Monitor* is being rolled-out incrementally, and currently focuses on:

- selected national and provincial infrastructure departments;
- public entities;
- Metropolitan Councils; and
- selected high capacity municipalities.

The *Compliance Monitor* will be extended to additional local authorities in due course.

1. Introduction

Information on tender notices, tender awards, and project closure is of paramount importance to the *cidb*, and provides the basis, amongst others, for:

- gathering reliable information on public sector construction expenditure, at a provincial level and at various tender Grades;
- assessing supply and demand in the construction industry;
- promoting and increasing transparency and accountability in construction procurement;
- monitoring and assessing the level of expenditure (through main contracts) on black-, women- and youth-owned construction enterprises; and
- monitoring compliance with and the impact of *cidb* Best Practices.

The Construction Industry Development Regulations of 2004, as amended, were developed in terms of the CIDB Act 38 of 2000 to support the above objectives. In terms of these Regulations, employers in the public sector must comply with requirements for project registration, award and closure as follows:

- a) for the public sector, on projects of which the value exceeds R200 000.00; or
- b) for a public entity listed in Schedule 2 of the Public Finance Management Act, on projects of which the value exceeds R10 million.

Specifically, in terms of the CID Regulations, employers (or clients) must comply with the following:

- a) registration of employers and employer's representatives on the *cidb Register of Projects* in terms of Clause 20;
- b) advertisement of tender invitations *cidb iTender/Register of Projects* in terms of Clause 38(6) (transitional measure);
- c) registration of the tender award in terms of Clause 18; and
- d) contract completion or cancellation in terms of Clause 21, once the transitional measures have been removed.

In the case of the public sector organisations and public entities, non-compliance with the *cidb* Regulations must in terms of Clause 21(4) be reported to the Auditor General, and can also result in fines being applied.

It is the *cidb's* aim and objective that this *Compliance Monitor* will contribute to improving compliance with the *cidb* Regulations with regard to the registration of tender notices, tender

awards and contract completion – and thereby contributing to a better understanding of public sector infrastructure spend and the development of the construction industry.

2. Background and Analysis

The background and key assumptions used in developing and in interpreting the *cidb iTender/RoP Compliance Monitor* are highlighted below.

2.1 Tender Notices

In addition to the *cidb* requirement that tender advertisements are to be recorded on the *cidb iTender/Register of Projects*, it is a National Treasury requirement that all public sector and public entities tenders are advertised in the *Government Tender Bulletins*. Details of advertised tenders have therefore been obtained from the *Government Tender Bulletins* as well as online sources such as *Online Tenders* and *Tenderscan* (their support is gratefully acknowledged).

Details of non-compliance with the *cidb* has then been obtained by comparing tender notices recorded within the *cidb iTender/Register of Projects* and those recorded in the *Government Tender Bulletins* and the online sources consulted. As the *Government Tender Bulletins* and the online tender scanning services provide a relatively comprehensive picture of all public sector and public entity tenders, the assessment of non-compliance is relatively comprehensive.

Notwithstanding this, the *cidb* views the details of non-compliance reported on in this *Compliance Monitor* as indicators only, and it is the *cidb*'s stance that the clients have the responsibility to provide evidence of mis-interpretation of non-compliance to the *cidb*.

Note that in this regard, inconsistencies do arise in the indicators of non-compliance where differences occur in the tender numbers on the *cidb iTender/Register of Projects* and in the government gazette or other tender sources, such as:

- xxxx12/13(A) and xxxx12/13A
- xxxx:12/13 and xxxx-12/13

Such differences should be brought to the attention of the *cidb*, and the *cidb* will endeavour to make the necessary changes.

2.2 Tender Awards

Details of tender awards (or contract awards) are obtained from the *Government Tender Bulletins* and compared with the tender awards recorded on the *cidb iTender/Register of Projects*. It is however not a requirement that all public sector and public entities contract awards are recorded in the *Government Tender Bulletins*, and the assessment of compliance with the recording of contract awards in the *cidb iTender/Register of Projects* is therefore not comprehensive.

The following indicators of non-compliance with the *cidb* requirements for registering tender awards on the *cidb iTender/Register of Projects* are used in the *Compliance Monitor*:

- i tender awards recorded in the *Government Tender Bulletins*, but not recorded in the *cidb iTender/Register of Projects*;
- ii tender notices recorded in the *cidb iTender/Register of Projects*, but not recorded in the *cidb iTender/Register of Projects* as tender awards; and
- iii tender notices recorded on sources other than *iTender/Register of Projects*, but not recorded in the *cidb iTender/Register of Projects* as tender awards.

Items (ii) and (iii) above are clearly only indicators of non-compliance, and do not take into account the non-award or cancelation of tenders, etc. Notwithstanding this, items (ii) and (iii) are however important indicators, and it is the cidb's stance that the clients have the responsibility to provide evidence of mis-interpretation of non-compliance to the cidb.

2.3 Contract Completion

Indicators of non-compliance with cidb requirements for recording of contract completion and/or contract termination will be included in due course.

3. Tender Notices

Details of the number of tender notices for selected public sector organisations and public entities that are recorded in *Government Tender Bulletins* but not recorded on *cidb iTender/Register of Projects* for the period 2012Q4 to 2013Q3 is shown on the following pages. In addition, details of the number of tender notices for selected public sector organisations and public entities recorded in *Government Tender Bulletins* which are also recorded on *cidb iTender/Register of Projects* is also shown. Collectively these tables give an indication of the extent of compliance or non-compliance by the client bodies.

The following clients are largely not using the *cidb iTender/Register of Projects* (*10% compliance or less*):

- Airports Company South Africa Limited (ACSA)
- Department of Agriculture and Land Administration; Northern Cape
- City of Tshwane Metropolitan Municipality (CTMM)
- Department of Transport; KwaZulu-Natal
- Department of Public Works, Roads and Transport; Mpumalanga
- Eskom Holdings Limited
- Department of Health; KwaZulu-Natal
- Buffalo City Local Municipality (BCLM)

Clients with the highest rate of compliance (*80% or greater*) include:

- Department of Education; Western Cape
- Department of Health and Social Development; Limpopo
- Department of Sport and Recreation; KwaZulu-Natal
- Department of Transport, Roads and Public Works; Northern Cape
- Nkangala District Municipality
- Department of Education; Free State
- National Department of Public Works
- City of Johannesburg Metropolitan Municipality (CJMM)
- Department of Transport and Public Works; Western Cape
- Department of Public Works, Roads and Transport; North West
- Department of Rural Development and Land Reform; KwaZulu-Natal
- Transnet Capital Projects
- Maluti a Phofung Local Municipality
- The South African National Roads Agency Ltd
- Department of Public Works; Eastern Cape
- Mogale City Local Municipality
- Ekurhuleni Metropolitan Municipality (EMM)
- Johannesburg Water
- Department of Roads and Public Works; Eastern Cape
- Department of Public Transport, Roads And Works; Johannesburg
- Department of Rural Development and Land Reform; Free State
- Department of Public Works; Free State
- Department of Public Works; Limpopo
- Transnet Freight Rail
- Umgeni Water

Details of individual tenders are available from the *cidb* on request.

Number of Non-Compliant Tender Notices per Quarter

Client	201204	201301	201302	201303
Airports Company South Africa Limited (ACSA)	6	3	12	7
Department of Water Affairs			1	2
Eskom Holdings Limited	7	5	11	25
Independent Development Trust (IDT)	45		76	43
National Department of Public Works		1	1	
The South African National Roads Agency Ltd	1	1	2	3
Transnet Capital Projects				1
Transnet Freight Rail	1		2	
Transnet National Ports Authority			1	2
Transnet Rail Engineering		1	1	
Department of Agriculture and Land Administration; Northern Cape	8	1	17	11
Department of Agriculture; Limpopo	7	1		2
Department of Education; Free State			1	
Department of Education; Limpopo			1	
Department of Education; North-West	23			
Department of Health; Free State		1		
Department of Health; KwaZulu-Natal		12	10	12
Department of Infrastructure Development; Gauteng	5	7		14
Department of Public Transport, Roads And Works; Johannesburg			6	
Department of Public Works, Roads and Transport; Mpumalanga	21	17		4
Department of Public Works, Roads and Transport; North West	3	1		
Department of Public Works; Eastern Cape		1		
Department of Public Works; Free State			3	
Department of Public Works; KwaZulu-Natal	52	28	22	9
Department of Public Works; Limpopo	8	7		1
Department of Roads and Public Works; Eastern Cape	9	2		8
Department of Roads and Transport; Limpopo			2	5
Department of Rural Development and Agrarian Reform; Eastern Cape	3		8	1
Department of Rural Development and Land Reform; Free State	1	1		
Department of Rural Development and Land Reform; KwaZulu-Natal			1	1
Department of Transport and Public Works; Western Cape	1		1	
Department of Transport; KwaZulu-Natal	2	94	197	111
Buffalo City Local Municipality (BCLM)	1	4	7	15
City of Cape Town Metropolitan Municipality (CCTMM)	8	15	4	5
City of Johannesburg Metropolitan Municipality (CJMM)		1		
City of Tshwane Metropolitan Municipality (CTMM)	2	4	9	6
Coega Development Corporation (Coega)		20	11	2
Ekurhuleni Metropolitan Municipality (EMM)	1	4	3	1
Eithekweni Metropolitan Municipality (EMM)		17	28	27
Johannesburg Development Agency	6	1	1	3
Johannesburg Roads Agency (JRA)		9	9	2
Johannesburg Water		3	1	
Nelson Mandela Bay Municipality (NMBM)	3		1	3
Rand Water	4	7	2	2
Umgeni Water	1	4	1	
Drakenstein Local Municipality	2	1	1	1
King Sabata Dalindyebo Local Municipality		1		1
Maluti a Phofung Local Municipality				1
Newcastle Local Municipality	11	4	2	2
Nkangala District Municipality		1		
Sol Plaatje Local Municipality		1		6

Number of Compliant Tender Notices per Quarter

Client	201204	201301	201302	201303
Department of Water Affairs		4	3	2
Eskom Holdings Limited				1
Independent Development Trust (IDT)	51	11	22	19
National Department of Public Works	20	22	22	18
The South African National Roads Agency Ltd	17	12	13	22
Transnet Capital Projects	5	3	5	4
Transnet Freight Rail	14		1	
Transnet National Ports Authority	1		2	1
Department of Education; Free State			20	23
Department of Education; North-West			16	
Department of Education; Western Cape	8			
Department of Health and Social Development; Limpopo	30			
Department of Health; Free State			3	1
Department of Health; KwaZulu-Natal			1	
Department of Health; Mmabatho		5		
Department of Infrastructure Development; Gauteng	17	6		14
Department of Public Transport, Roads And Works; Johannesburg		3	34	3
Department of Public Works, Roads and Transport; Mpumalanga				1
Department of Public Works, Roads and Transport; North West	44	8	57	11
Department of Public Works; Eastern Cape			7	1
Department of Public Works; Free State	2	1	2	11
Department of Public Works; KwaZulu-Natal	6	9	11	9
Department of Public Works; Limpopo	18	54		10
Department of Roads and Public Works; Eastern Cape	40	35	26	31
Department of Roads and Transport; Limpopo		8		10
Department of Rural Development and Agrarian Reform; Eastern Cape	3		4	
Department of Rural Development and Land Reform; Free State	11	2		
Department of Rural Development and Land Reform; KwaZulu-Natal	5	3	4	37
Department of Rural Development and Land Reform; Limpopo			1	1
Department of Sport and Recreation; KwaZulu-Natal		16		
Department of Transport and Public Works; Western Cape	29	14	25	8
Department of Transport, Roads and Public Works; Northern Cape	16	11	20	5
Department of Transport; KwaZulu-Natal	3	1		
Buffalo City Local Municipality (BCLM)				1
City of Cape Town Metropolitan Municipality (CCTMM)	26	24	19	13
City of Johannesburg Metropolitan Municipality (CJMM)	30	11		
Coega Development Corporation (Coega)	1	5	11	10
Ekurhuleni Metropolitan Municipality (EMM)	33	16	10	9
Eithekweni Metropolitan Municipality (EMM)	3	48	27	2
Johannesburg Development Agency	6	9	3	3
Johannesburg Roads Agency (JRA)	2	2	3	2
Johannesburg Water	9	3	11	6
Mandela Bay Development Agency (MBDA)		1		
Nelson Mandela Bay Municipality (NMBM)	8		2	
Rand Water			3	8
Umgenti Water	6		8	10
Drakenstein Local Municipality	5	2	1	1
King Sabata Dalindyebo Local Municipality				1
Maluti a Phofung Local Municipality	3	3	6	3
Mogale City Local Municipality	9	18	8	3
Newcastle Local Municipality	2	21	2	8
Nkangala District Municipality	21	17	10	13
Sol Plaatje Local Municipality		1		3

Tender Notices Compliance Ratio (%)

Client	Number of Tenders	Compliance Ratio
Airports Company South Africa Limited (ACSA)	28	0%
Department of Water Affairs	12	75%
Eskom Holdings Limited	49	2%
Independent Development Trust (IDT)	267	39%
National Department of Public Works	84	98%
The South African National Roads Agency Ltd	71	90%
Transnet Capital Projects	18	94%
Transnet Freight Rail	18	83%
Transnet National Ports Authority	7	57%
Department of Agriculture and Land Administration; Northern Cape	37	0%
Department of Education; Free State	44	98%
Department of Education; North-West	39	41%
Department of Education; Western Cape	8	100%
Department of Health and Social Development; Limpopo	30	100%
Department of Health; KwaZulu-Natal	35	3%
Department of Infrastructure Development; Gauteng	63	59%
Department of Public Transport, Roads And Works; Johannesburg	46	87%
Department of Public Works, Roads and Transport; Mpumalanga	43	2%
Department of Public Works, Roads and Transport; North West	124	97%
Department of Public Works; Eastern Cape	9	89%
Department of Public Works; Free State	19	84%
Department of Public Works; KwaZulu-Natal	146	24%
Department of Public Works; Limpopo	98	84%
Department of Roads and Public Works; Eastern Cape	151	87%
Department of Roads and Transport; Limpopo	25	72%
Department of Rural Development and Land Reform; Free State	15	87%
Department of Rural Development and Land Reform; KwaZulu-Natal	51	96%
Department of Sport and Recreation; KwaZulu-Natal	16	100%
Department of Transport and Public Works; Western Cape	78	97%
Department of Transport, Roads and Public Works; Northern Cape	52	100%
Department of Transport; KwaZulu-Natal	408	1%
Buffalo City Local Municipality (BCLM)	28	4%
City of Cape Town Metropolitan Municipality (CCTMM)	114	72%
City of Johannesburg Metropolitan Municipality (CJMM)	42	98%
City of Tshwane Metropolitan Municipality (CTMM)	21	0%
Coega Development Corporation (Coega)	60	45%
Ekurhuleni Metropolitan Municipality (EMM)	77	88%
Ethekwini Metropolitan Municipality (EMM)	152	53%
Johannesburg Development Agency	32	66%
Johannesburg Roads Agency (JRA)	29	31%
Johannesburg Water	33	88%
Nelson Mandela Bay Municipality (NMBM)	17	59%
Rand Water	26	42%
Umgeni Water	30	80%
Drakenstein Local Municipality	14	64%
Maluti a Phofung Local Municipality	16	94%
Mogale City Local Municipality	43	88%
Newcastle Local Municipality	52	63%
Nkangala District Municipality	62	98%
Sol Plaatje Local Municipality	11	36%

4. Tender Awards

The number of tender awards for selected public sector organisations and public entities recorded in *Government Tender Bulletins* but not recorded on *cidb iTender/Register of Projects* for the period 2012Q4 to 2013Q3 is shown on the following pages. The number of tender awards for selected public sector organisations and public entities recorded in *Government Tender Bulletins* which are also recorded on *cidb iTender/Register of Projects* is also shown on the following pages. Collectively these tables give an indication of the extent of compliance or non-compliance by the client bodies.

However it should be noted that it is not mandatory for government departments to publish details of tender awards, and the assessment of non-compliance is therefore limited to those clients that have elected to publish details of tender awards in the government Gazette.

Low levels of compliance (*30% or less*) are seen for:

- Department of Water Affairs
- Department of Agriculture and Land Administration; Northern Cape
- Department of Health; KwaZulu-Natal
- Department of Public Transport, Roads And Works; Johannesburg
- Department of Roads and Transport; Limpopo
- Department of Rural Development and Land Reform; KwaZulu-Natal
- Department of Transport; KwaZulu-Natal
- Department of Public Works; KwaZulu-Natal
- Department of Roads and Public Works; Eastern Cape

Relatively high levels of compliance (*70% or more*) are seen for:

- Department of Transport and Public Works; Western Cape
- Department of Education; Gauteng

Details of individual tenders are available from the *cidb* on request.

Number of Non-Compliant Tender Awards per Quarter

Client	201204	201301	201302	201303
Department of Water Affairs	4	1	11	
National Department of Health			1	
National Department of Public Works	4	13	3	15
Department of Agriculture and Land Administration; Northern Cape				11
Department of Agriculture and Rural Development; Gauteng	1	1		
Department of Agriculture, Rural Development and Land Administration; Mpumalanga	3			
Department of Arts and Culture; KwaZulu-Natal			1	
Department of Education; Free State				1
Department of Education; Gauteng	1			
Department of Education; Mpumalanga			1	
Department of Education; Northern Cape			4	
Department of Education; Western Cape	4			
Department of Health; KwaZulu-Natal	9	1	1	
Department of Health; Western Cape	1			
Department of Human Settlements; KwaZulu-Natal	1			
Department of Public Transport, Roads And Works; Johannesburg		11		4
Department of Public Works, Roads and Transport; Mpumalanga				16
Department of Public Works; KwaZulu-Natal	10	6	12	9
Department of Public Works; Limpopo			4	
Department of Roads and Public Works; Eastern Cape	3	9	4	
Department of Roads and Transport; Limpopo	3		12	
Department of Rural Development and Land Reform; KwaZulu-Natal		9		
Department of Social Development; Northern Cape	1			
Department of Sports, Arts, Culture and Recreation; Gauteng				2
Department of Transport and Public Works; Western Cape			4	
Department of Transport; KwaZulu-Natal	12	8	35	28
Lepelle Northern Water		2		

Number of Compliant Tender Awards per Quarter

Client	201204	201301	201302	201303
National Department of Public Works	1	10	8	1
Department of Agriculture and Rural Development; Gauteng	2	1		
Department of Education; Gauteng			5	
Department of Public Works, Roads and Transport; Mpumalanga				29
Department of Public Works; Free State				1
Department of Public Works; KwaZulu-Natal	3	1	3	3
Department of Public Works; Limpopo			7	
Department of Roads and Public Works; Eastern Cape		6		
Department of Transport and Public Works; Western Cape			150	36
Department of Transport; KwaZulu-Natal				4

Tender Awards Compliance Ratio (%)

Client Description	Number of Tenders	Compliance Ratio
Department of Water Affairs	16	0%
National Department of Public Works	55	36%
Department of Agriculture and Land Administration; Northern Cape	11	0%
Department of Education; Gauteng	6	83%
Department of Health; KwaZulu-Natal	11	0%
Department of Public Transport, Roads And Works; Johannesburg	15	0%
Department of Public Works, Roads and Transport; Mpumalanga	45	64%
Department of Public Works; KwaZulu-Natal	47	21%
Department of Public Works; Limpopo	11	64%
Department of Roads and Public Works; Eastern Cape	22	27%
Department of Roads and Transport; Limpopo	15	0%
Department of Rural Development and Land Reform; KwaZulu-Natal	9	0%
Department of Transport and Public Works; Western Cape	190	98%
Department of Transport; KwaZulu-Natal	87	5%

Indicators of non-compliance with the requirements for the award of tenders is given on the following page, in which the number of tender notices recorded on iTender/RoP which have not been recorded as being awarded on iTender/RoP are given (other than those recorded as being cancelled, etc.).

These indicators suggest high levels of non-compliance with requirements of the registration of tender awards for:

- National Department of Public Works
- Department of Infrastructure Development; Gauteng
- Ekurhuleni Metropolitan Municipality (EMM)
- Transnet Property

Number of Tender Notices Recorded on iTender/RoP not Awarded per Quarter

Client	200904	201001	201002	201003	201004	201101	201102	201103	201104	201201	201202	201203
National Department of Public Works	12	3	5	1	21	7	4	32	58	33	44	77
Transnet Property	47	16	8	1	2	15	4	1	10	1		2
Transnet Rail Engineering								1	5	18	1	6
Department of Infrastructure Development; Gauteng								36	58	21	3	25
Department of Public Transport, Roads And Works; Johannesburg	3				4	3	20	1	11	11	1	11
Department of Public Works; KwaZulu-Natal	2	1		4	2	3	3	5	1		10	19
Department of Rural Development and Land Reform; KwaZulu-Natal								10	7	1		4
City of Cape Town Metropolitan Municipality (CCTMM)	2		1	1	3	1	1	1	2	3	2	9
Ekurhuleni Metropolitan Municipality (EMM)	19	4	2	5	13	6	14	10	23	18	5	7
Rand Water								4	2	6	12	9

Further indicators of non-compliance with the requirements for the award of tenders is given on the following page, in which the number of tender notices obtained from *Government Tender Bulletins* and other sources and which have not been recorded as being awarded on iTender/RoP are given. (Note that some tenders may have been cancelled or delayed – but this is not reflected here.)

High levels of non-compliance with requirements of the registration of tender awards is suggested for:

- Department of Transport; KwaZulu-Natal
- Department of Infrastructure Development; Gauteng
- Department of Roads and Public Works; Eastern Cape
- National Department of Public Works
- Department of Public Works; KwaZulu-Natal
- Coega Development Corporation (Coega)
- Ethekwini Metropolitan Municipality (EMM)
- The South African National Roads Agency Ltd
- Ekurhuleni Metropolitan Municipality (EMM)
- City of Tshwane Metropolitan Municipality (CTMM)
- Department of Transport and Public Works; Western Cape
- Department of Health and Social Development; Limpopo
- Department of Public Works, Roads and Transport; Mpumalanga
- Department of Rural Development and Agrarian Reform; Eastern Cape
- City of Cape Town Metropolitan Municipality (CCTMM)

Number of Tender Notices from Tender Bulletins and Other Sources not Awarded per Quarter

Client	201103	201104	201201	201202	201203
Department of Water Affairs	3	2	1	4	2
Development Bank of Southern Africa (DBSA)		18			
National Department of Public Works	17	25	25	29	45
The South African National Roads Agency Ltd	15	7	8	9	29
Department of Agriculture and Land Administration; Northern Cape	8	12	4	1	10
Department of Agriculture; Limpopo	2	1		9	6
Department of Education; North-West	11	5	2		
Department of Education; Western Cape	4	11			5
Department of Health and Social Development; Limpopo	38	10			
Department of Health; KwaZulu-Natal	2	15			12
Department of Infrastructure Development; Gauteng	52	49	75	18	17
Department of Public Transport, Roads And Works; Johannesburg		3	8	2	
Department of Public Works, Roads and Transport; Mpumalanga	16	12	4	13	1
Department of Public Works, Roads and Transport; North West	3	3	7	1	2
Department of Public Works; Free State	6	4	1		
Department of Public Works; KwaZulu-Natal	37	35	7	25	31
Department of Public Works; Limpopo	14	22			
Department of Roads and Public Works; Eastern Cape	42	42	38	18	19
Department of Rural Development and Agrarian Reform; Eastern Cape	4	7		11	20
Department of Rural Development and Land Reform; Free State		1	26		
Department of Rural Development and Land Reform; KwaZulu-Natal	10	7	1		2
Department of Rural Development and Land Reform; Limpopo			14	1	1
Department of Sport and Recreation; KwaZulu-Natal			12		
Department of Transport and Public Works; Western Cape	19	20	3	4	13
Department of Transport, Roads and Public Works; Northern Cape	14	6	2	1	
Department of Transport; KwaZulu-Natal	85	23	55	147	158
Buffalo City Local Municipality (BCLM)	7	2	5	11	7
City of Cape Town Metropolitan Municipality (CCTMM)	8	6	7	4	17
City of Johannesburg Metropolitan Municipality (CJMM)	3	7	2		3
City of Tshwane Metropolitan Municipality (CTMM)	10	11	9	17	15
Coega Development Corporation (Coega)	25	47	15	13	24
Ekurhuleni Metropolitan Municipality (EMM)	12	19	16	4	12
Ethekewini Metropolitan Municipality (EMM)	31	21	20	4	16
Johannesburg Development Agency	1	4	7	5	2

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