



Committee for Spatial Information
Statutory Committee established in terms of section 5 of the Spatial Data Infrastructure Act (Act No.54 of 2003)
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25 June 2019

Mr Jacques du Preez
Chairperson: Western Cape Spatial Information Forum
Western Cape Provincial Government
Private Bag X9043
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RE: QUESTIONS TO COMMITTEE FOR SPATIAL INFORMATION: DATA SUB-COMMITTEE

Dear Mr du Preez

The Directorate: National Spatial Information Framework (NSIF) and the CSI Data Subcommittee, thank you and the Western Cape Spatial Information Forum (WCSIF) for the contribution made towards the development of South African Spatial Data Infrastructure (SASDI). The CSI requested the D: NSIF to provide a formal response to your letter dated 6 March 2019. The D: NSIF and the CSI Data Subcommittee reviewed the questions raised by WCSIF and provides an official response below:

1. **Spatial Data Capture requests** (Form E1 – request by non-custodian to capture spatial data)

1.1. How will urgent and ad hoc capturing of data be dealt with? E.g. Disasters or simple requests from clients, such as capturing a farm or crop boundary.

RESPONSE: Data will be captured without permission for urgent matters (e.g. disasters, land invasions, etc.) Forms shall be completed and submitted within 20 working days of capture.

1.2. The current regulations do not cater for such exemptions.

RESPONSE: The Committee for Spatial Information is in the process of reviewing regulations. This gap shall be addressed accordingly.

1.3. Suggest that the CSI Data SC provide a clear guideline in this respect with a process that would make this clear to all concerned.

RESPONSE: The Data subcommittee will communicate an interim process pending the approval of regulations by end of September 2019.

2. **SASDI Compliance** – It is assumed that the regulations are already active.

2.1. How would an organ of state (OOS) deal with any queries or audits related to the SDI Act and regulations?

RESPONSE: Audits and inspections should not be seen in a negative context, but rather as an assessment to test the level of compliance with an aim to improve. The Directorate: NSIF will

be conducting technical assessments in municipalities to assess level of compliance. Queries or audits related questions and support to be referred to the D: NSIF.

2.2. Further, the custodianship policy only applies to base datasets, what about others?

RESPONSE: In the interim the Base Dataset policy only applies to identified base datasets and appointed custodians (coordinating and contributing). The NSIF will regularly update this list of datasets and custodians and provide it to the CSI members – at least quarterly.

2.3. At present it is unlikely that any organ would pass all the compliance requirements.

Can the CSI issue a letter / communique in this regard that would help OOS to respond to negative findings. e.g. not all custodians down to local level have been appointed.

RESPONSE: The D: NSIF will draft a letter explaining the process to become compliant and the timelines associated with it.

2.4. By when is it anticipated that all contributing custodians will be appointed?

Should only appointed base dataset custodians presently comply, or all mandated collectors (owners) of spatial data?

RESPONSE: The appointment of contributing custodians will be done in a phased approach, guided by the finalisation of the Base Data Set Custodianship Framework. All organs of state must comply. If an organ of state is appointed as a Base Data Set Custodian or a Contributing Data Custodian, compliance is by submitting Form E2. If an organ of state is not appointed as a Base Data Set Custodian or a Contributing Data Custodian, compliance is by submitting Form E1.

3. Is there a policy on spatial data preservation?

3.1. e.g. current Archives state 20 years

3.2. Can Data SC please provide guidance on all spatial data preservation – maybe policy?

RESPONSE: The SDI Act, 2003 or any policy formulated to support the implementation of SASDI, will not be in contravention with any other law of the country, but will rather complement and support the implementation thereof. The CSI through the Subcommittee on Policy and Legislation will be developing a preservation policy which will convey the same principle as outlined in the National Archives and Records Service of South Africa (NARSSA) Act, 1996. In the absence of a spatial data preservation policy the OSS are encouraged to comply with the NARSSA Act.

4. Drone imagery

4.1. Can CSI on behalf of country initiate a “request for registration as service provider of drone imagery and services” that would enable SITA to list approved service providers that can be called on in emergencies?

4.2. This will ensure imagery standards are defined and adhered to and prevent every OOS from acquiring own drones. Many challenges in this regard could be avoided.

4.3. Many other advantages and more than willing to help with further advice in this regard.

***RESPONSE:** The CSI guided by the Data subcommittee will engage SITA and other relevant stakeholders to discuss and find a suitable approach to address this matter. The CSI in collaboration with National Treasury to communicate the importance of OSS to comply with regulation 5 including the acquisition of imagery using drones. The Standards subcommittee will be requested to investigate the feasibility of developing a standard for the acquisition of imagery using drones.*

5. **Data Classification** – there are many questions regarding data classification.

5.1. When will Land Use classification standard be gazetted?

***RESPONSE:** The work relating to the classification of Land Use is championed by the Branch: SPLUM within the Department of Agriculture, Rural Development and Land Reform. A plan with timelines will be requested from SPLUM and will be communicated accordingly. Once the classification is finalised and agreed upon, then section 11 of the SDI Act will be invoked to develop the Land Use Classification Standard. The process will be championed by the Standards subcommittee of the CSI.*

5.2. What about security classification? Any guidance from CSI? Or rely on MISS (Min Info Sec Std)?

5.3. WC has a security classification based on MISS. All data owners to classify own data (Restricted, Confidential, Secret, Top Secret).

***RESPONSE:** In the absence of a MISS “equivalent” for spatial data the OSS are encouraged to comply with the MISS.*

5.4. Archives act states that any record classification must be passed by National (and in our case because of own act, Provincial) Archivist – is there clarity on CSI and DATA SC mandate regarding data classification?

***RESPONSE:** The Subcommittee on Policy and Legislation to investigate the matter.*

6. **Metadata Capture on EMC**

6.1. Which datasets MUST be captured? What about the ad hoc requests and small unique datasets? Where does one draw the line? All data? WC will capture own administrative datasets. Currently, more than 40 records on the EMC. For Local Authorities we will recommend the same; i.e. capturing admin dataset metadata.

***RESPONSE:** Metadata should be captured for all data including all operational data captured and maintained as part of strategic activities of the organisation.*

7. Spatial vs Geo-Spatial vs Attribute

7.1. The planned amendment to the Act speaks to changing all references from “spatial” to “geo-spatial”. Clarity on this is urgent and vital to determine scope of SDI Act.

RESPONSE: The Standards subcommittee of the CSI is currently working on standardizing terminology for SASDI. The adoption of a single universal definition will define the scope of the SDI Act. Other terms such as ownership, stewardship will be also be defined.

7.2. Custodianship of addresses. Clarity is needed regarding the custodianship of addresses, i.e. The role of municipalities compared to the SA Post Office. Is SAPO the coordinating custodian and Local Authorities contributing custodians?

RESPONSE: The principle of collaborative custodianship outlined in the Base Data Custodianship Policy and also enshrined in the constitution will be applied in the management of Address data. Municipalities definitely have a role to play as contributing custodians of address data.

The questions raised above are vital and much appreciated as they help guide the implementation of SASDI in a provincial space. The D: NSIF and the Data subcommittee commits to continue engaging with the WSIF through Office of the Premier to ensure commitments made herewith are honoured. Your initiative to meet with provincial Heads of Department, Municipal Managers and Chief Financial Officers to explain the SASDI compliance requirements is also appreciated as it will assist in communication the objectives of SASDI at the highest level in government echelon.

Kind regards

