

**SUBMISSION TO THE WILD COAST COASTAL DEVELOPMENT PLAN,
GENERAL NOTICE 160 OF 2025**

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Introduction

We welcome the opportunity to make written representations on the plan pertaining to Coastal Development in the Wild Coast in the Eastern Cape.

We make this submission as a collective of traditional leaders, community members, non-governmental organisations, voluntary associations, and eco and community lodges that affiliate with the **Wild Coast Forum**. This submission is addressed to the Provincial Commissioner and the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism, copied to the Premier of the Eastern Cape, the MEC for the Eastern Cape Minister of Police, and the National Police Commissioner.

We note that the purpose of the Wild Coast Development Plan (WCDP) as stated on page 4, is for the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism, in keeping with its dual mandate in both economic development and environmental management, to:

- Establish a planning instrument to guide and facilitate development and sustainable use of the Wild Coast.
- Create a balance between the development of an under-developed, high poverty region and the protection of an environment which is nationally and internationally recognized as being of exceptional value and importance.
- Guide the decision-making process when reviewing development applications related to the Coastal Conservation Area that require a permit in terms of the Decree.
- Review and replace the following previous Coastal Development plans for the Wild Coast / Coastal Conservation Area: Wild Coast Tourism Development Policy (2001), and the Coastal Development Control Plan (1979) of the former Republic of Transkei.

The WCDP acknowledges tourism as a key economic driver for the Wild Coast and it sets out regulatory provisions to ensure infrastructure and economic development do not harm the region's beautiful natural environment. However, the plan fails to address the most significant barrier to sustainable tourism and economic development: the rising tide of violent crime and the absence of an effective law enforcement response.

Tourism is critical to our local economy. In the Wild Coast, tourism provides employment, sustains small businesses, and fosters cultural exchange. However, relentless violent crime is rapidly undoing these gains—not just discouraging tourists but making it unsafe for local businesses, NGOs and residents to function. **A plan on development for our region, that is silent on crime and safety, is an incomplete plan.**

1. Tourism is a crucial economic driver in South Africa and along the Wild Coast

The WCDP acknowledges tourism as a catalyst for economic development in the Wild Coast and sets out the regulatory provisions required to ensure that economic and infrastructure development does minimal harm to the natural landscape that attracts tourists to the Wild Coast.

[Tourism contributed 8.8% to South Africa's GDP in 2024](#), a notable increase from 3.5% in 2022 and 3.8% in 2021 after the COVID pandemic, showing the sector's "resilience and growth despite global economic challenges." The tourism industry also supported around 1.68 million jobs in 2024; it is a key economic driver and generates substantial revenue. Statistics South Africa's 2018 report notes that the tourism industry accounts for approximately 50% of employment opportunities worldwide.

This highlights the critical role tourism plays in economic development, essential in regions like the Wild Coast in the Eastern Cape, where tourism is a significant contributor to local economic growth and community development.

However, the national gains from tourism are not being felt along the Wild Coast.

2. Crime is decimating the Wild Coast's tourism economy

Recent studies on tourism and economic development highlight a strong link between crime and declining visitor numbers. A [2020 study on Coffee Bay](#) found that 75% of respondents credited tourism with their employment, while 88% agreed that tourism strengthened their cultural identity. Yet, these economic and social benefits are being erased by unchecked criminal activity.

Research confirms that violent crime, particularly kidnappings, armed robberies, and hijackings, discourages visitors. A 2020 case study on [tourism, crime and safety in uMhlathuze Local Municipality](#) cites a body of tourism research that suggests that declines in tourism are due to violent crimes and political instability. The study also notes that "a variety of pull factors, such as excellent value for money (against all major currencies), heritage and culture, wine farms, Edu-tourism, health tourism, community-based tourism and eco-tourism continue to make South Africa an attractive holiday destination. However, the threat of negative perceptions discourages potential tourists from visiting South Africa. These perceptions include the risk of safety due to crime and political instability, as well as less obvious factors such as health issues". (p373)¹ The Wild Coast faces a similar crisis.

The WCDP is however silent on crime and safety and its impacts on the local economy, tourism and development in the Wild Coast.

Commenting on a surge of abductions along the Wild Coast, the Shadow MEC for Economic Development, Environmental Affairs and Tourism [said](#) on 24 September 2024, "This alarming trend not only endangers lives but also poses a severe threat to the region's tourism industry, which is vital for local economies and livelihoods... The fear of violence and insecurity has deterred potential travellers, leading to decreased bookings and financial losses for local

¹ Similar assessment is made in [Tourism as a Catalyst for Local Economic Development in the Transkei Wild Coast, South Africa](#)

businesses. If left unaddressed, these incidents could have long-lasting repercussions on the region's economic stability, a region still reeling from the after effects of Covid."

In recent years, Xhorha Mouth has seen a significant increase in criminal activities, including assaults, burglaries, hijackings, kidnappings, and extortion. These incidents, with no arrests, have stripped the community from their safety and peace of mind.

"As a longstanding member of the Wild Coast NGO Forum, and a substantial employer within communities along the Wild Coast, Axiom Education is concerned about the impact that crime is having on our local staff, as well as our ability to attract visitors, funding and skilled staff from outside the area. Without safety in our communities, the development work so many NGOs do is at risk." Craig Paxton - Executive Director - Axiom Education

3. A crisis of impunity: Alarming increase in violent, organised crime in the Wild Coast

From [our record](#) of unsolved crimes and attacks reported to SAPS since 2021 across the central Wild Coast region between Nqileni Village and Mdumbi, an alarming trend is evident in increasingly organised violent crime.

All the twenty-one (21) recent cases we have tracked are violent, they include kidnapping, abduction, and the use of firearms. More than half of these cases include firearms, and several of the attacks used R4 rifles.

From this record, it is apparent that people at most at risk are Wild Coast residents who have set up development programmes such as clinics, schools, early childhood development centres and eco-lodges, and tourists, both national and international.

It is also apparent that many of these crimes were perpetrated by the same number of people using similar weapons. The reported appointment of Organised crime unit commander, Lieutenant-Colonel Nceba Mshiyo, indicates that SAPS acknowledges these crimes are part of organised crime in the Wild Coast.

All these cases remain unresolved, and no arrests have been made, despite community members identifying perpetrators and reporting their whereabouts to SAPS.

"Sustainable and inclusive economic growth and development is not possible without community safety. Community safety ensures that money invested in development achieves its desired result and that the most number of people benefit. This requires that there are clear 'rules and regulations' that govern what is permissible and what is not to ensure fairness and inclusion. Unless development occurs in a situation characterised by high levels of community safety, criminal networks will attempt to control and will typically undermine any development initiatives. They do this as they will see opportunities to hijack development initiatives for their

own, rather than community benefit. This is typically achieved through the threat or use of violence as we have seen with the growth of extortion as one manifestation of violent organised crime in South Africa. However, community safety cannot be effectively achieved unless there is a high level of trust in the police. This should be the key objective of police leadership.” Gareth Newham, Head of Justice and Violence Prevention at the Institute for Security Studies.

SAPS failure to respond: a systemic crisis

The [Integrated Wild Coast Development Programme](#) (IWCDP), driven by the Department of Economic Development, Environmental Affairs and Tourism, refers to the N2 highway as a major infrastructure project underpinning the development programme. In [Intercape Ferreira Mainlines \(Pty\) Ltd vs. the Minister of Police and Others](#)² the Eastern Cape High Court order notes in its summary that the attacks on Intercape buses and passengers are “part of an organised scheme” in which 165 criminal complaints were laid with SAPS in respect of acts of violence.

Despite this, not a single person has been arrested, and no prosecutions are imminent or pending. The order found that SAPS failed to investigate and prevent the crimes as required in terms of section 205(3) of the Constitution; the Provincial Commissioners failed to report the crimes to the DPCI as instances of organised crime, crime which requires national prevention or investigation, and/or crime which requires specialised skills in the prevention and investigation thereof³, and the DPCI has failed to investigate and prevent the crimes as instances of national priority offences as required.⁴

“Most violent organised crime is committed by a relatively small proportion of people in any given area. These are typically committed by career criminals who have chosen a life of crime for their economic benefit. The only way to reduce violent and organised crime is through a [targeted policing approach](#). Law enforcement agencies therefore need to prioritise resourcing and developing their intelligence and investigative capabilities to ensure that the leaders and key players in criminal networks can be identified, investigated, prosecuted and imprisoned. This benefits community safety in two ways. It removes those that commit harm to communities and prevents others from starting to be involved in harmful criminal behaviour. Effective law enforcement agencies do not measure themselves primarily on activities like arrests and roadblocks. They measure themselves on the number of cases prosecuted successfully in court, the length of the sentences imposed and the amount of stolen goods and the proceeds of crime recovered.” Gareth Newham, Institute for Security Studies

² Other respondents were the National Commissioner; SAPS Provincial Commissioner, Eastern Cape; Provincial Commissioner, Western Cape; SAPS Provincial Commissioner, Kwa-Zulu Natal; SAPS Provincial Commissioner, Gauteng; SAPS Provincial Commissioner, North-West; SAPS National Head of the Directorate for Priority Crime investigation (DPCI); National Director of Public Prosecutions and the Head of the Investigating Directorate.

³ As required in terms of section 16(4)(b) of South African Police Service Act, 68 of 1995 (the SAPS Act)

⁴ In terms of section 17D(1)(a) of the SAPS Act.

4. Increasing impunity

When multiple reports of increasingly violent crimes are made to the police, and no arrests are made, criminals operate with increased impunity and boldness. This is evident in our experience.

The residents of Xhorha Mouth live in fear; criminals from outside our villages come here to commit crimes over and over again, and in all of these cases no one is arrested. We don't see any police coming here to protect us. Ntsikelelo Mbangasini, Sub-Headman.

Our livelihoods are deeply affected by the increasing and unresolved crime along the Wild Coast. Tourism has declined along with other economic and income-generating activities. Civil society organisations and development initiatives, who support early childhood development centres, schools, food security and water security are also negatively affected.

“Rising crime on the Wild Coast is crippling tourism, costing jobs, and deepening suffering. Without action, economic decline will only accelerate.” Dave Martin, Founder of Bulungula Lodge.

5. Community action and police responses

Many of us have mobilised across the region. For example, on 5 September 2024, over 350 residents from Xhorha Mouth villages marched to the Elliotdale Police Station demanding urgent action from the SAPS to deal with the recent surge in violent crimes in our communities. We have sent a [Memorandum](#)⁵ handed to the Elliotdale SAPS.

Although some of our areas have seen an increase in some visible policing, the systemic challenges facing policing in our area run deep. The police stations are severely under-resourced, with too few vehicles and officers who lack the basic tools to do their jobs.

“It is possible for the police to measurably reduce crime using the existing resources available. This has been repeatedly demonstrated internationally by [using available information and data more effectively](#) to guide policing tactics and operations. In South Africa, a pilot project that tweaked the SAPS approach to hotspot policing in a high murder precinct, saw a [20% reduction in violent crime](#) in 2023. This project was rolled out to four other high violence policing precincts in 2024 with [positive results](#). These initiatives demonstrate that when law enforcement agencies learn how to better use their resources, focus on collaborating with other agencies and institutions and use rigorous evidence-based methods, success can be achieved in a relatively short space of time. Fortunately, the Minister of Police in the current

⁵ The memorandum was signed by Chief of the Jalamba Traditional Council, Zwelikhanyile Gwebindlala, Headman Ntsikelelo Mbangasini on behalf of the Traditional Board, Ward 28 Councillor, Phumzile Msaro, Ward 19 Councillor, Phumelele Metu, Principal of the Bulungula College, Siyabulela Matshayana, Board Member of the Bulungula Incubator, Lindile Mthiyo, Manager of the Bulungula Backpackers Lodge, Andiswa Tshayiso, Director of The Equality Collective, Tess Peacock, and Director of Viva con Agua South Africa, Ajay Paul.

administration is aware of this and is expecting to see the SAPS start moving towards a modern, innovative and collaborative organisation. This means that the SAPS has to stop doing what does not work, and start doing things differently that has a real impact on communities' wellbeing." Gareth Newham, Institute for Security Studies.

6. Conclusions

- Community safety is not only about reducing crime or fear, but also a strategic asset that supports the social and economic transformation of the Wild Coast. By investing in safety measures, the region can unlock its full potential as a thriving hub for tourism and community-driven economic growth.
- Instances of organised crime require national prevention or investigation, and/or specialised skills in prevention and investigation, by the SAPS National Head of the Directorate for Priority Crime Investigation (DPCI).
- While it is important that economic development and environmental planning is undertaken in tandem, it is critical that all development planning engages with community safety. Particularly in the Wild Coast, community safety underpins economic development and tourism as a key driver of that development, in one of the poorest provinces in the country.
- Without community safety, the Wild Coast economy and its development will be hamstrung, and unless we have a significant investment in, and prioritisation of, both specialist and routine policing in our communities, the already threadbare economy of the Wild Coast will be decimated.

"Decades of progress in education and health on the Wild Coast are being undone as rising crime drives skilled professionals away. Without safety, the fight against poverty is losing many of its frontline workers," Rejane Woodroffee, Director, Bulungula Incubator

7. Recommendations

To the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism:

- We urge the MEC to take account of the impacts of crime on community safety, economic development and the environment in this and future development planning.
- We urge the Department to work with the Eastern Cape Provincial Department of Safety in the development and finalisation of any development plans.

To the Premier, the MEC, the Minister of Police, Minister of Tourism and the National Commissioner, and the EC Provincial Commissioner:

- We urge immediate and decisive action to combat the rise of violent, organised crime in the Wild Coast.
- Commission a specialised investigation into increasingly organised and violent crime in the Wild Coast. We need your help to break the trend, in which criminals are operating with impunity.

- Arrest and bring the perpetrators, some of whom have been positively identified and reported to SAPS, in criminal attacks, to justice.
- Fast track the commissioning of the Tafalehashe and other satellite police stations.
- Equip existing police stations with vehicles to provide emergency responses in rural areas and respond swiftly to crime reports.
- Increase police patrols and establish community safety partnerships to ensure the safety of both residents and visitors.
- Create specialised task forces to respond swiftly to incidents and bolster community trust in law enforcement.
- Present a time-bound plan on how police stations along the Wild Coast and Provincial SAPS will work together to combat the rising crime on the Wild Coast.
- Launch initiatives to educate tourists about safety measures and provide clear channels for reporting suspicious activity.
- Involve local communities in developing solutions, ensuring that their voices are heard and integrated into safety strategies.
- Develop targeted campaigns to reassure potential visitors about safety improvements and promote the region's attractions.

These actions are essential to not only restore confidence in the Wild Coast as a safe travel destination but also to ensure the well-being of its residents, and its overall economic development.