



**CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD**

**WATER AND SANITATION DEPARTMENT
WATER AND WASTE DIRECTORATE**

Michael Killick

Director: Bulk Services
Water & Sanitation Services

T: 021 400 3620 **M:** 083 393 1284
E: michael.killick@capetown.gov.za

16 November 2021

OUTA – Organisation Undoing Tax Abuse
318 Oak Avenue
Randburg

For the attention of: Ms Stefanie Fick
Executive Director- Accountability Division
PER EMAIL: stefanie.fick@outa.co.za

Dear Madam,

**PUBLIC ACCESS AND DISCLOSURE OF WATER QUALITY DATA HELD BY THE CITY OF CAPE TOWN:
YOUR LETTER DATED 19 OCTOBER 2021**

We hereby respond to your letter dated 19 October 2021 received by email.

Please find below our response to your letter concerning the public access and disclosure of inland water quality data held by the City of Cape Town.

The City's water quality information is recorded in two formats, viz.

- i) Laboratory Certificates of analysis for various biological and chemical parameters, and
- ii) Raw data captured from the certificates of analysis in the City's Scientific Services Branch Laboratory Information Management System (LIMS).

The raw data information is generally for internal use only, and the City generally does not make this information available owing to the high risk of misrepresentation, misinterpretation and the potential misuse thereof. For this reason, the City's Water & Sanitation Department, requires a "Terms of Use" agreement in terms of granting access to the raw data.

This requirement is in terms of section 44 of PAIA as the City deems that the disclosure of raw data could reasonably be expected to frustrate the deliberative process by inhibiting the candid communication thereof, as envisaged by section 44 of PAIA. Therefore, the approach to restrict access to the raw water quality data to internal use is considered reasonable and justifiable, based on section 44(1) of PAIA.

Unfortunately your correspondence does not specify whether your "sources " utilised formal PAIA provisions in requesting access to the information and we are accordingly unable to respond on the refusal of granting or disclosure of such information.

WATER & SANITATION HEAD OFFICE

8 VOORTREKKER ROAD, CNR OF MIKE PIENAAR BOULEVARD, BELLVILLE 7535 PRIVATE BAG X98, BELLVILLE, 7535
www.capetown.gov.za/thinkwater

The City does make water quality information publicly available after analysis of the raw data in terms of where the raw data is analysed by applying scientifically accepted methods and statistical calculations, assessed and reports thereof compiled to assist in decision-making and/or management functions, such reports are available for public access.

To this end, the City recently, in late 2020, published the "WATER QUALITY OF RIVERS AND OPEN WATERBODIES IN THE CITY OF CAPE TOWN: STATUS AND HISTORICAL TRENDS, WITH A FOCUS ON THE PERIOD APRIL 2015 TO MARCH 2020" as a Summary Report and a comprehensive technical report. This water quality report on the City's inland aquatic eco systems includes an analysis of all historical water quality data collected up to the end of March 2020. These reports are available electronically on the City's web site:

- Summary report

([CT inland water quality report summary.pdf \(capetown.gov.za\)](#))

- Technical Report

(https://resource.capetown.gov.za/documentcentre/Documents/City%20research%20reports%20and%20review/Inland_Water_Quality_Report_FULL.pdf)

It is the City's intention to publish the above reports annually.

The City does report regularly on the inland water quality data to the Water and Waste Portfolio Committee and this information is readily available on the City's web site. Furthermore, in some cases, river catchment or sub-catchment reports are compiled and these are available to the public, for example "Analysis of ambient water quality in the Diep (N) Catchment within the City of Cape Town area" report which is updated regularly, and submitted to DEA&DP and to Sub-Councils 3 and 5 frequently.

The City plans to illustrate the water quality information of its inland river and water bodies on the City's web site in the future, and is currently exploring the best method of accomplishing this.

Yours faithfully,

Michael Killick

WhatsApp: 063 407 3699 **Online:** www.capetown.gov.za/servicerequests

Email: water@capetown.gov.za **SMS:** 31373 (max 160 characters) **Phone:** 0860 103 089

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