



19 November 2013

Chairman
Economics and Industry Standing Committee
Parliament House
PERTH 6000

Dear Chairman

RE: Inquiry into the Economic Implications of Floating LNG: Request for Further Information

Thank you for your letter dated 7 November seeking additional information in relation to the inquiry into economic implications of floating LNG. Please find below CCI's response to the additional questions.

1. *What, for CCI, constitutes full, fair and reasonable opportunity to quote and tender on contracts?*

CCI supports the definition for full, fair and reasonable opportunity set out in the Australian Industry Participation National Framework.

Full - Australian industry has the same opportunity afforded to other global supply chain partners to participate in all aspects of an investment project (e.g. design, engineering, project management, professional services, IT architecture);

Fair - Australian industry is provided the same opportunity as global suppliers to compete on investment projects on an equal and transparent basis, including being given reasonable time in which to tender; and

Reasonable - tenders are free from non-market burdens that might rule out Australian industry and are structured in such a way as to provide Australian industries the opportunity to participate in investment projects.

2. *CCI's submission states that the Australian Jobs Act 2013 adds significantly to compliance costs by mandating that Australian Industry Opportunity Officers are employed by project developers. CCI also sees this as having little positive impact on current local content and actually reducing Australia's competitiveness. Could you please advise what assessments have been done on the effectiveness or otherwise of this measure?*

Enclosed is a copy of CCI's submission to the *Australian Jobs Bill* for the Committee's reference. Given that the *Australian Jobs Act 2013* was only recently introduced, no assessments have been done on the effectiveness of this measure in improving local content opportunities.



3. *CCI cites the ACIL Tasman analysis that indicated a critical shortages of chemical, gas, petroleum and power general plant operators from 2012. Given that it is now November 2013, is CCI able to advise what the current situation is in relation to this predicted workforce shortage?*

ACIL Allen Consulting have advised that no further modelling has been undertaken in relation to these predicted workforce shortages. CCI understands that work will be undertaken early in 2014 to further test the assumptions on which these forecasts were made.

4. *CCI's submission discusses the approvals processes and regulations as a significant burden on the oil and gas industry, and states that there are over 150 pieces of legislation for upstream oil and gas, and over 50 regulatory agencies. Please provide the details of the 150 pieces of legislation and the 50 regulatory agencies, together with areas of overlap. Also, as discussed during the hearing, please provide CCI's submission to the Productivity Commission's review of the regulatory burden on the oil and gas sector.*

Enclosed is a copy of the Productivity Commission's draft report, Major Project Development Assessment Processes, and CCI's submission to this inquiry. These documents provide further detail on the legislation and regulations surrounding major project approvals across the country and in Western Australia.

5. *In relation to the possibility of an FLNG supply base being established in Western Australia, please provide the details of where the information in CCI's submission was sourced and whether that information still applies. Also, please update the committee on CCI's actions in relation to this potential.*

CCI's submission identified that FLNG provides the opportunity to deliver a range of long term economic benefits for WA, and was based on feedback gathered through our established member forums and committees. CCI has not undertaken any further work in this area.

6. *Please provide the paper on the cost of regulation to the Western Australian economy, as mentioned at page 8 of the hearing transcript.*

A copy of CCI's Cost of Doing Business discussion paper is provided for the Committee's reference.

Thank you for the opportunity to provide evidence to the committee. Please contact Dana Hyland, CCI's Manager, Economics and Policy on 9365 7701 or dana.hyland@cciwa.com if you need any further information.

Yours sincerely


John Nicolaou
Chief Officer, Member Services and Advocacy
Chief Economist

19 April 2013

The Secretary
Senate Economics Legislation Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Mr Bryant

Thank you for the opportunity to provide a submission to the inquiry into the exposure draft of the *Australian Jobs Bill 2013* (the "Bill").

CCI is the leading business association in Western Australia and the second largest organisation of its kind in Australia. CCI has a membership of over 8,000 organisations in all sectors of the economy. About 85 per cent of members are small businesses, and members are located in all geographical regions of WA.

It is positive to see that the Federal Government has recognised the important role Australian industry participation in major resources projects can play in building a diverse Australian economy. CCI has long held the view that Australian companies should be given full, fair and reasonable opportunities to be involved in the supply chain of major projects – particularly as many of these projects are based in Western Australia.

However, the Federal Government has not demonstrated a case to regulate the use of local content on major projects through a legislated instrument such as proposed in the Bill.

In its 2011 policy paper discussing *Local Content*, CCI put forward that a local content policy should have the goal of facilitating the long-term development of an internationally competitive industrial and service sector in Western Australia, that can secure work on not only Australia's major resources projects but on global projects. In order to achieve this, CCI called for the government to implement policies to reduce the burden on local industry, and to invest in infrastructure that promoted business growth and investment. CCI also called for industry to play its role, with suppliers to act together to better showcase their capabilities, and project proponents encouraged to have a physical procurement presence amongst the local industry.

There are already a range of policies in place aimed at increasing local content:

- The Western Australian State Government has a Local Industry Participation Framework, which aims to link suppliers and major project proponents in a number of formal and informal ways.

- The State Government also administers three steering committees for major LNG projects that are underway or under consideration in the state.
- The Industry Capability Network (ICN), the Western Australian brand of which is administered by CCI on behalf of the WA Government, provides a platform for Australian suppliers to tender for work on major projects.
- The Federal Government has a national framework for Australian Industry Participation Plans, which provide a system for major projects worth over \$2 billion to provide extensive opportunities for local industry participation.
- Other Federal Government policies include: Supplier Advocates and the Buy Australia Home and Abroad initiative.

These policies have been successful. According to the WA Department of Commerce¹, some \$29.9 billion worth of contracts have been awarded to Western Australian companies between July 2011 and November 2012. The level of Australian local content in Western Australian resources projects in the **operations** phase is currently at 94.7 per cent, while the level for projects **under construction** stands at 73.6 per cent. The latter figure is influenced by the use of modularised rigs for offshore oil and gas projects in the state's North West coast, which are produced by a handful of companies globally.

Given the demonstrated success of these policies, CCI believes that legislating the introduction of Australian Industry Participation Plans (AIPPs) is unnecessary, and is likely to add to the cost of major projects in Australia and increase the time and money spent by adding to the extensive project approvals process that already exists. Project proponents will be required to deal with yet another government agency in order to progress a project from conception to construction.

Specific concerns with the Bill

CCI has a number of concerns with the Bill, and its potential implications, as they currently stand.

The Bill does not take into account the **impact on, and interaction with, existing State Government policies**, such as the Western Australian Government Local Industry Participation Framework². In this regard, the introduction of a legislated instrument at a Federal level seeking to promote local industry participation, such as the one proposed in the Bill, risks duplicating work for the private sector and adding to compliance costs, without increasing local content outcomes. Most major project proponents and tier one suppliers in Western Australia already have AIP plans as part of existing government policy, and do so without a legislated requirement³.

¹ Western Australia Department of Commerce. 2012. *Local Content Report: November 2012*. Accessed online at <http://www.commerce.wa.gov.au/>

² While this document calls for a greater use of Industry Participation Plans at a Federal level, it does not call for the introduction of a legislated instrument such as the one proposed in the Bill.

³ Western Australian Department of Commerce. 2011. *Local Content Report: November 2011*. Accessed online at <http://www.commerce/wa.gov.au/>

The Bill also contains plans for the introduction of a **new government agency**, the Australian Industry Participation Authority (The Authority), and new oversight in the form of the Australian Industry Participation Advisory Board (AIPAB). The Bill outlines that the role of the Authority will be to monitor and enforce compliance with the AIPP process, but it is unclear as to the size of the new agency, and how it will be resourced. CCI is concerned that the creation of a new government agency to police AIP may unnecessarily add to pressure on Australia's public finances.

The Bill contains a number of passages that are **complex** and potentially onerous for business to implement, particularly for smaller companies that may not have the in-house capability to interpret and comply with the legislation proposed in the Bill. The rules governing the primary and secondary obligations under the AIP plan rules (section 35, 36, 38 and 39 of the Bill), and the requirements to report on compliance with the AIPP (sections 24 through 28 of the Bill) will require significant additional work and capital investment on the part of project proponents, and likely add to project development costs.

This effect will be compounded when the proposed **materiality thresholds** are taken into consideration. The project value threshold of \$500 million is materially lower than the current threshold of \$2 billion, and will mean that many projects that have not been required to submit an AIPP under the current regime will now be required to. In addition, the definition of a 'major project' is proposed to be broadened to the point where a large number of capital spending projects, beyond the resources sector, will be required to develop, maintain, implement and report on the progress of AIPPs. This appears to be an unintended consequence of this Bill. Based on the application of the new definitions of a major project, the share of investment projects that must develop, maintain, implement and report on AIPPs will rise from approximately six per cent of total major projects to 26.2 per cent⁴.

The proposed **indexation factor** is not an appropriate recognition of the cost associated with a major project. The Bill proposes the use of the Consumer Price Index, designed to measure the broad-based price increase of a basket of consumer goods purchased by households, as the escalation factor for the major project threshold amount; which is not the best reflection of project cost escalation. A more appropriate figure could be from the Producer Price Index Table 17 (ABS Catalogue 6427.0), which seeks to measure construction costs.

In addition, the **definition of a 'trigger date'** is unreasonable, in the context of the project development pipeline. It is unreasonable to require a project owner to provide an AIPP, under the onerous parameters set out in the Bill, to the Australian Industry Participation Advisory Board (AIPAB) some 90 days before 'the project concept design begins', as it is unlikely that the precise project specifications will be known at this point in the process. In addition, the Bill provides scope for the AIPAB to determine its own timing for the lodgement of an AIPP, which would allow this timing to be pushed even earlier into the early stages of a project's development.

The penalties for non-compliance with the AIPP process as outlined in the Bill compound the problems caused by prescriptively legislating to increase local content penetration on major projects in Australia. These penalties, including the 'naming-and-shaming' of project proponents and the ability for the AIPAB to apply for an injunction to halt work on the project are excessive,

⁴ CCI calculations based on Access Economics. 2013. *Access Economics Investment Monitor: December 2012*. Accessed online at <http://www.deloitteaccesseconomics.com.au/>

and could potentially harm Australia's reputation as a destination for investment and a place to do business. They would place Australian industry participation compliance in the same league as taxation and environmental laws, which CCI views as an excessive ratcheting up of requirements.

Summary

In CCI's view, the Bill should not proceed in its current form. The Government has not presented a persuasive case for a legislated instrument on local industry participation. Instead, the Federal Government should acknowledge that there are already a number of policies in place to address local industry participation, that local content penetration in major projects is significant, and looks to ways of coordinating these efforts more effectively as a means of promoting full, fair and reasonable opportunity for local suppliers. The Government should, as a priority, consider a broad suite of measures to boost Australian industry's competitiveness and productivity, so that Australian firms can take full advantage of that full, fair and reasonable opportunity.

Should you have any questions or concerns, please contact Ryan Buckland on (08) 9365 7693 or ryan.buckland@cciwa.com.

Yours sincerely

John Nicolaou
Chief Officer, Member Services and Advocacy
Chief Economist

CCI SUBMISSION TO THE PRODUCTIVITY COMMISSION ISSUES PAPER: MAJOR PROJECT DEVELOPMENT ASSESSMENT PROCESSES

Introduction and Economic context

Major project approvals are a key element of WA's, and Australia's, continuing economic success.

Western Australia has seen significant increases in business investment projects over the last decade – the project pipeline has increased from \$79 billion in 2002 to \$288 billion in 2012. Driven by the resources sector, this investment surge occurred as commodity prices were rising, terms of trade improving, and demand for our commodities overseas remained strong. It occurred despite serious problems with our project approvals systems.

WA's ability to continue to benefit to the same extent is not guaranteed. While demand for our resources is expected to increase, competitors are developing their own resources, often with lower costs, larger reserves, and simpler approval processes. The International Energy Agency predicts a number of new and existing competitors (Russia, East African nations, the United States) will increase gas exports in direct competition with a number of major projects on the horizon for WA.¹ Increasing political stability is driving major mining companies to consider and develop projects in Africa and Latin America. We can no longer rely on our stable political environment as our investment winning comparative advantage.

It is also increasingly difficult to compete on project costs, even against advanced "high cost" nations in the EU and North America. Numerous senior executives from major project proponents in WA, including Rio Tinto, BHP Billiton and Chevron have all stated their concerns with rising costs, noting WA is often the most expensive market to develop major projects.²

The Fraser Institute Annual Survey of Mining Companies³ provides some useful indications of Australian approvals processes relative to those in many jurisdictions. The 2012-13 survey found:

- uncertainty about environmental regulation in Western Australia (incorporating federal and state based regulation) was a deterrent to investment for 32 per cent of businesses surveyed; and
- regulatory duplication and inconsistency (incorporating federal and state based regulation) were a deterrent to investment for 30 per cent of businesses surveyed.

These results place Western Australia behind key competitors including many Canadian provinces, states in the United States and European countries where regulatory standards are often more stringent. Uncertainty, duplication and inconsistency are driving investor concerns and making them think twice about investing in Australia.

¹ International Energy Agency. 2012. *World Energy Outlook 2012*.

² See for example http://www.riotintoironore.com/ENG/media/38_presentations_2739.asp, www.uwainthezone.com.au/wp-content/uploads/2012/11/S2.docx

³ Fraser Institute. 2013. *Annual Survey of Mining Companies 2012/13*.

While businesses are doing all they can to minimise costs, project approvals are a key area where government can help improve our competitiveness and lower costs, while maintaining or even improving regulatory standards.

This submission briefly outlines the current major project approval process in WA and some of the key issues raised by CCI members. It then considers government responses to date before considering appropriate markets on which to benchmark Australian performance.

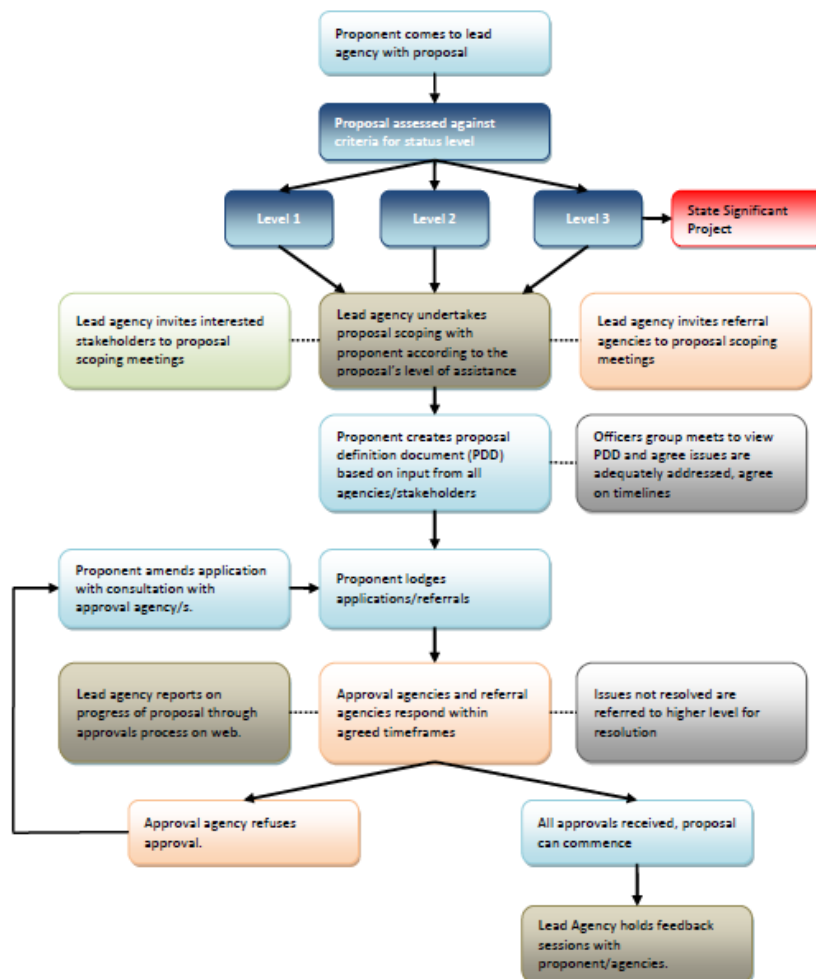
Current project approvals

Current approvals processes are complex and time consuming. Some businesses in Western Australia report their projects require hundreds of approvals from numerous agencies at the federal, state and local levels.

Figure 1 below provides an overview of the process at the state level as outlined by the Government of Western Australia. But this diagram does not reflect the true complexity of the process. A major project is likely to require approval from the Environmental Protection Authority, Department of Environment and Conservation, Department of Indigenous Affairs, Department of Water, Department of State Development, Department of Planning, Western Australian Planning Commission, Department of Transport and Department of Health.

Figure 2

Diagram 4: Coordination of approvals under lead agency framework.



Source: Department of Premier and Cabinet. *Lead Agency Framework: a guidance note for implementation.*
http://www.dmp.wa.gov.au/documents/Lead_Agency_Guidance_Document_March_2011.pdf

In working through these approvals, a business may have to comply with a dozen or more pieces of state legislation (see Table 1), each of which have countless specific regulations need to be considered in major project approvals.

Table 1: Selection of WA agencies and legislation dealing with project approvals

Agency	Relevant legislation
Department of State Development	State Agreements
Department of Mines and Petroleum	<i>Mining Act 1978</i> <i>Offshore Minerals Act 2003</i>
Department of Planning	<i>Planning and Development Act 2005</i>
Western Australian Planning Commission	<i>Planning and Development Act 2005</i>
Environmental Protection Authority	<i>Environmental Protection Act 1986, Part IV</i>
Department of Environment and Conservation	<i>Environmental Protection Act 1986 (EP Act)</i> <i>Conservation and Land Management Act 1984</i> <i>Contaminated Sites Act 2003</i> <i>Waste Avoidance and Resource Recovery Act 2007</i> <i>Reserves (National Parks, Conservation Parkes, Nature Reserves and Other Reserves) Act 2004.</i>
Department of Indigenous Affairs	<i>Aboriginal Heritage Act 1972</i>
Department of Water	<i>Rights in Water and Irrigation Act 1914</i>
Department of Health	<i>Health Act 1911</i>

Furthermore, many projects will require federal approval, particularly under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), and / or local government rules and regulation.

Understanding the burden of these multiple legal instruments and approvals processes relative to other jurisdictions should be a key outcome of the Productivity Commission's work.

Key issues

In our discussions with members a number of specific concerns with the approvals process have been raised. Issues with the Commonwealth *EPBC Act 1999* and the *WA Environmental Protection Act 1986* are a particular and regular concern.

Overlaps, duplication and inconsistency

Overlaps, duplication and inconsistency drive up the costs of project approvals, without providing additional protection to the environment or the local community. CCI members point to a range of areas where overlaps, duplication and inconsistency occur.

- **State Legislation Overlaps.** Numerous duplications exist in state based approval authorities. For example, the EPA and DMP have environmental approval responsibilities, while the EPA and Department of Indigenous Affairs have aboriginal heritage responsibilities.
- **Environmental offsets.** Within a project a single environmental impact can require two separate, sometimes conflicting, actions as an offset. For example, Federal procedures could require a direct offset of offsite habitat protection, while the state might mandate scientific research in response to the same impact, effectively double counting the impact and its costs to the business.
- **Water.** Amendments to the EPBC Act which require Commonwealth assessment and approval of the water impacts of coal seam gas and coal mine projects directly duplicate existing state assessments and approvals.
- **Analysis and reports.** Tailored reports are required for both state and federal environmental approvals and for monitoring and compliance of projects after approvals have been granted, but cannot be shared between approval authorities.
- **Greenhouse gas approvals.** Many state project approvals in Western Australia include mandatory reporting of greenhouse gas emissions, in direct duplication with the Commonwealth National Greenhouse and Energy Reporting Scheme.

As a starting point, benchmarking Australian approaches to cross-jurisdictional issues to other markets with similar issues should be a priority for the Productivity Commission.

The Commonwealth and WA State Government must conclude a long awaited bilateral agreement to enable environmental approvals to be undertaken by state agencies.

Opportunities for parallel processing across agencies (within states and across state and Commonwealth responsibilities) should be further explored.

Specific elements of duplication should be removed (for example collaborative approaches to offsets should be agreed).

Greater use of strategic assessments where they can genuinely reduce the approvals burdens faced by individual businesses.

Timeliness

Major projects can often take a significant time to develop and construct. Research from the University of Western Australia⁴ shows that resource projects can take up to 10 years to complete. The research also notes that speeding up this process could double the number of projects proceeding to construction at any one point in time.

While numerous issues affect the timeframes for major projects, improving approvals to make the process more efficient is one way to significantly improve timeframes for major projects and reduce opportunity costs.

The Department of Mines and Petroleum suggests mining projects in WA take on average 28 months to complete the environmental assessment process of the Department of Mines and Petroleum and the EPA,⁵ though timeframes can be significantly longer and projects can incur significant opportunity costs.

Where statutory or targeted timelines exist, they can be lengthy and performance relative to targets is highly varied. In WA's EPA, 20 per cent of assessments did not meet agreed timeframes in 2011-12.⁶

A more specific example of inefficient processes leading to long delays concerns basic raw materials (BRM) approvals (cement, sand and other materials for construction which are usually quarried near urban areas). Various sites for the extraction of BRM are classified as Priority Resource locations in the state's Statement of Planning Policy 2.4. These are "locations of regionally significant resources which should be recognised for future basic raw materials extraction and not be constrained by incompatible uses or development". However, there are numerous instances where applications to extract these defined resources have been held up in approvals processes despite their classification, in some cases taking four or five years to resolve.

At the federal level, statutory timeframes under the EPBC Act can in effect be ignored with powers given to the Minister under section 130 of the Act. As just one example, the statutory timeframe for the approval of one mine in WA in 2013 was extended on three occasions by the Minister with no specific actions required of the project proponent, amounting to an additional 90 days over the original statutory timeframes.⁷

Finally, timeframes are usually arbitrary and have no basis in comparison with other jurisdictions.

Providing benchmarks for the timeframes for approval should form a key component of the Productivity Commission's work.

There should also be increased use of statutory timeframes which incorporate mechanisms to encourage compliance and limit opportunities to extend timeframes.

⁴ Kenneth W Clements and Jiawei Si. 2011. "The investment project pipeline: cost escalation, lead time, success, failure and speed", *Australian Journal of Management*. 36(3): 317-348

⁵ Department of Mines and Petroleum. 2012. *How long does it take to get a mine approved in Western Australia?* http://www.dmp.wa.gov.au/documents/WA_Mine_Approval_Timelines.pdf

⁶ Environmental Protection Authority. 2012. *Annual Report 2011-12*.

⁷ <http://www.environment.gov.au/epbc/notices/assessments/2009/5174/2009-5174-extension-notice.pdf>

Procedural fairness

A fair and transparent approvals process also remains an ongoing concern for many project proponents in Western Australia. While some recent changes have been enacted to the Environmental Protection Authority's guidelines for environmental impact assessment to improve procedural fairness, CCI still has ongoing concerns.

For example, the WA Minister for Mines and Petroleum recently enacted a blanket ban on coal mines in the Margaret River region without any strategic assessment of the region. The decision followed an impact assessment and appeal for one project in the region under which other existing and potential investors had no indication it would form the basis of a more wide ranging decision. The option of a strategic environmental assessment, and with it the benefits of transparency and wide ranging consultation, was in effect ignored.

There are also limited opportunities to weigh the costs and benefits of major projects in approvals processes. Environmental assessments often form the primary vehicle for governments to engage the public on major projects. As occurred in the case noted above, environmental assessments therefore often consider wider cultural and strategic development issues, outside the relevant acts (in this case cultural and economic issues). A more integrated process could provide an opportunity for the costs and benefits of projects to be weighed against one another. It would also provide greater transparency of the basis on which decisions are made.

The Productivity Commission should consider how Australian major project approvals processes can be more transparent and appropriately integrate fair procedures.

Transparent and unbiased decision making procedures should be published and adhered to by governments and regulators.

Responses to date

In response to the problems outlined above, four significant government reviews of project approvals processes have been undertaken in WA.

- Independent Review Committee, *Review of the Project Development Approvals System*, 2002.
- Auditor General, *Improving Resource Project Approvals*, 2008.
- Red Tape Reduction Group, *Reducing the Burden*, 2009.
- Department of Mines and Petroleum Industry Working Group – *Review of Approvals Processes*, 2009.

In addition, Infrastructure Australia's *Building Australia's Future: A Review of Approval Processes for Major Infrastructure*, pointed to various reforms needed across federal, state and local government.

While each of these reviews has focused on different elements of the approvals process, all have pointed to the need to streamline and / or consolidate approvals processes in the state

and with the federal government. However, in response we have seen only limited actions from state and federal governments.

The Western Australian Government has initiated a lead agency framework and other initiatives that have helped better define responsibilities for approvals. The lead agency has provided a benefit particularly to large state wide significant projects that can be driven through the approvals process by the Premier or individual Ministers. But it falls far short of a “one-stop-shop” called for in many of the reviews noted above. Most projects still find themselves wading through bureaucracy at a number of agencies.

Cooperation also exists between the Department of Mines and Petroleum and Environmental Protection Authority, helping to ensure that exploration activities for shale gas will be predominantly regulated by the DMP.

The online *Environmental Assessment and Regulatory System (EARS)* at the Department of Mines and Petroleum has also improved transparency and information sharing. This system will now be expanded across a wider range of agencies.

But much more is needed. In particular many of the reviews noted above have called for a single agency to be responsible for project approvals in WA. However, this has not been developed.

Cooperation across jurisdictions has also not progressed. Overlaps and duplication put at risk our competitiveness, especially as similar jurisdictions like Canada embark on cooperative approaches across their federation. The Council of Australian Governments, following the advice of the Business Advisory Forum of which CCI is a member, has committed to reducing duplication, but no concrete actions have eventuated. Furthermore, a potential bilateral agreement between the Commonwealth and Western Australia has not proceeded. This lack of progress is to the detriment of investment in Australia just as the global market becomes more competitive.

Potential and existing comparisons

In this environment it is vital that the Productivity Commission make as wide a comparison as possible. Competitors for investment span the globe from developed markets in North America and Europe to emerging markets in Africa, Asia and Latin America.

Project approval processes in Canada and in individual Canadian provinces will serve as strong examples. Under reforms initiated in 2012, the Canadian federal government is instituting statutory timeframes of between 12 and 24 months for environmental assessments. And most importantly, they are also initiating a “one project, one review” system where federal environmental assessments can be undertaken by provincial authorities.⁸

The Productivity Commission should also include key emerging markets in its analysis. Many markets in the developing world have to deal with similar regulatory challenges to Australia including native title and indigenous heritage, and pristine natural environments. These markets are key competitors, often have higher regulatory standards than are assumed and should therefore not be ignored.

⁸ Government of Canada. 2012. *Canada's Economic Action Plan*.
<http://www.actionplan.gc.ca/en/backgrounder/r2d-dr2/strengthening-environmental-protection>

Conclusion

CCI welcomes the Productivity Commission's efforts to benchmark Australia's major project approvals processes. This issue has been a long term concern of CCI and the business community in WA, but despite numerous reviews pointing to unnecessarily complex procedures, very little has been done to actually improve processes.

In particular, CCI members highlight the need to reduce overlaps, duplication and inconsistency in processes within and between state and federal approvals; the need to improve the timeliness of approvals processes and reduce opportunity costs; and the need to improve transparency and procedural fairness. Understanding and benchmarking the approaches of other markets to these and other issues should help us to improve our processes so that we can remain competitive in the long term.