AMERICAN CHAMBER OF COMMERCE

IN SOUTH AFRICA *(NPC)*

African Growth and Opportunity Act
Submission on the Out-of-Cycle Review of South Africa Eligibility for Benefits

Introduction to Amcham

The American Chamber of Commerce in South Africa ("AmCham") represents 250 American companies in South Africa, 60 of which are Fortune 500 companies. 89 of the companies participated in an economic survey and indicated they contributed R278 billion to the South African economy and created employment for more than 62,000 South African employees directly and 160,000 indirectly. These companies are invested in South Africa for the long term, and are committed to addressing unemployment, inequality and poverty.

Methodology to collate information

We asked our companies to describe any problems they experience when doing business in South Africa, and which they found to be discriminating against American companies. This then, is a compilation of the issues that were raised.

IT IS NOT OUR INTENTION to request that the US Government excludes South Africa from the benefits of AGOA. We believe this would have a debilitating impact on South Africa, and ultimately on the ability of American companies to do business in South Africa.

Our intention in submitting these issues is to use the AGOA 30 day Review as leverage for action/changes in terms of policy issues that the South African Government is pursuing.

ISSUES THAT HAVE BEEN RAISED AS DISCRIMANATORY TO US BUSINESS IN SOUTH AFRICA

1 Foreign Ownership Restriction in the Private Security Industry

Some of our members are US-owned companies which own and operate private security services businesses in South Africa. These South African operations employ many thousands of employees and have contributed substantial capital investment and infrastructure development as well as introducing international best practice in skills training and development which has uplifted the entire sector.

South African law requires that all employees of these companies, from the most senior management to entry level guards, must be South African citizens or permanent residents. These are much-needed jobs in a country which is suffering from unemployment levels upwards of 25%.

The sustainability of this investment is threatened by Section 20 of the Private Security Industry regulation Amendment Act (PSIRA) which is currently before the President of South Africa for enactment.

Section 20 of the Act provides that foreign-owned private security firms, including companies that supply, manufacture, install and distribute equipment to the private security industry, will need to sell at least 51 percent of their South African businesses to South Africans, in what is often referred to as a 'forced localisation' measure.

This restriction to a minority share of foreign ownership for security firms operating in South Africa discriminates against American interests as compared to South African interests, and therefore violates the eligibility criteria as set out in Section 104 of AGOA.

The international norm of non-discrimination precludes a host state from subjecting foreign investors or their investments to any treatment less favourably than that which it accords to its own nationals and their investments (national treatment), or those of any other state (most-favoured-nation treatment), in like circumstances.

Furthermore, the elimination of trade barriers is one of the specific requirements for access to AGOA. It is clear that the signing into law of this provision will result in the erection of a substantial barrier to trade.

A range of South African industry organisations, trade and law experts and diplomatic representatives have raised their deep concerns about Section 20, and there is senior South African legal opinion confirming that the Act places South Africa in breach of its international law commitments and obligations.

It is our view that the enactment of Section 20 of the PSIRA would be in direct violation of the provisions of AGOA.

The economic and trade benefits of AGOA for South Africa have been substantial and the Security Industry Alliance is extremely supportive of South Africa's continued participation. Unfortunately, Section 20 threatens the highly desirable future benefits of AGOA for South Africa and so we believe we are obligated to raise it in the context of the out-of-cycle review.

Furthermore, the inclusion of Section 20 is the only matter holding back the implementation of the PSIRA Act of which we are supportive because we believe it will result in better and much-needed regulation and management of the private security industry in South Africa.

The suggested corrective course of action is for the PSIRA Act to be sent back to Parliament for the conclusive removal of Section 20.

2 IP Patent Protection Dilution

Company 1

As a leading emerging economy, South Africa's internationally aligned IP standards have been an important element in encouraging biopharmaceutical company investments in South Africa. While the extent to which a country benefits from IP depends on the country's relative strengths and factors such as infrastructure, political stability, and respect for the rule of law, it is widely recognized that where countries have strong and effective IP protection regimes in place, there is a significant connection between increased incentives for local innovation, and the transfer of technologies that foster local innovation and economic growth.

In September 2013, the RSA government made public its draft "National Policy on Intellectual Property" setting out numerous proposals to dramatically reshape existing IP protections. The draft policy, now under consideration by the government is concerning to American companies, because the overall intent appears to weaken current standards that are important to investors and innovators including with respect to substantive search and examination, restrictions on patentable subject matter, and use of compulsory licensing as an industrial policy tool. Innovative biopharmaceutical companies support the South African government's overall objective to develop an IP policy grounded in the principle that strong IP will help spur useful innovation and socio-economic empowerment.

While the draft policy raises concerns, the process of stakeholder engagement has also been less than transparent. Initially, the private sector was invited to provide comments, with the understanding that the Department of Trade and Industry would offer a meaningful consultation to discuss our concerns.

Unfortunately, since the draft policy was released in 2013, there has been little meaningful stakeholder consultation and the process itself has been largely closed to public comment. American companies are concerned that the draft policy is about to be sent to the cabinet for approval, without a thorough, in depth discussion of its impact on investors, employers and companies operating in South Africa. Again, we would encourage open, meaningful consultation with the private sector to ensure the perspectives of innovators developing and delivering treatments to South African patients are fully considered.

Company 2

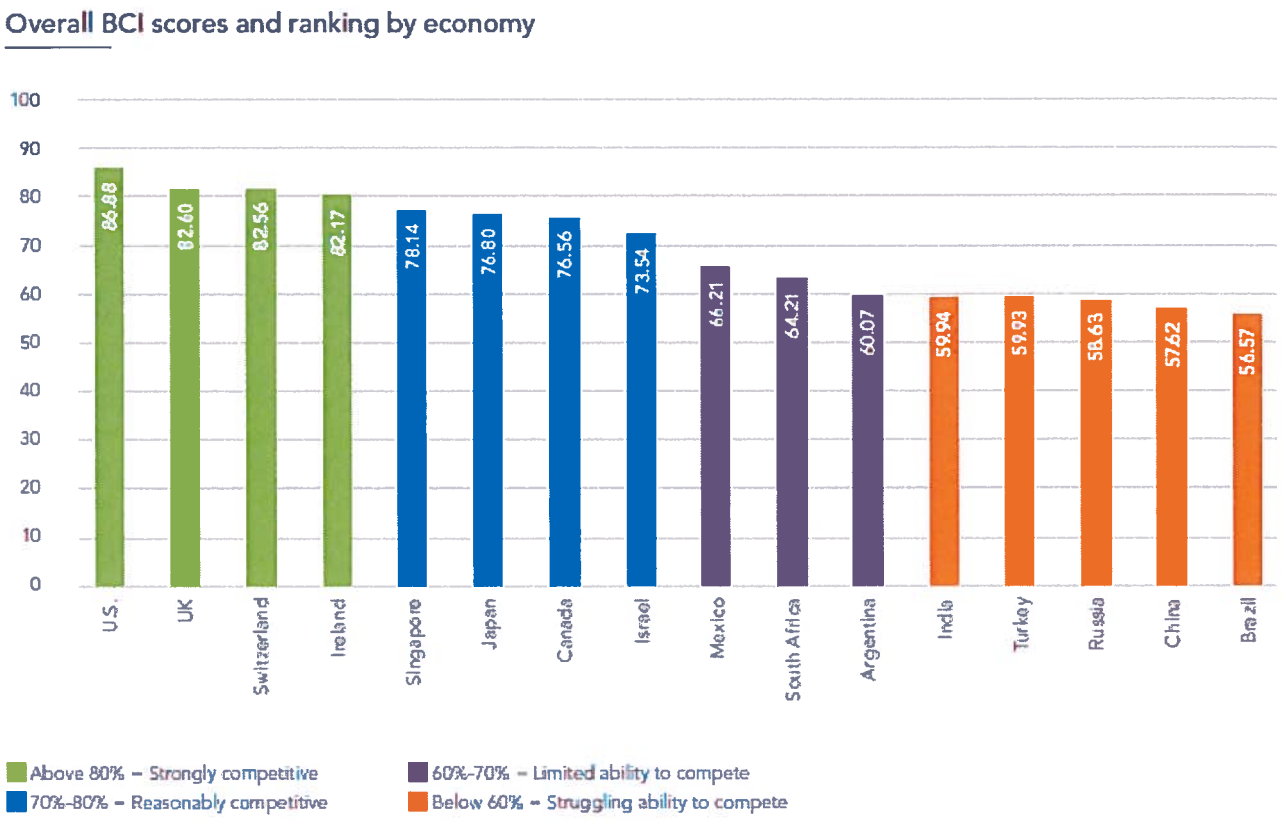
Reasonable patent protection is a key determinant in the business case for operating in particular jurisdiction for pharma as well as other innovative industries such as IT. South African patenting activity is substantially lower than that of other large economies. Looking at high-quality patents filed, the South African share of the global total was 0.06% at 2012 figures. A study of trends on the latest patent application data indicates that there is a steady decline in the number of patents being pursued over the period 2006 to 2014. The number of local patents is marginally greater than that of overseas patents (5756 vs 5320 over this period). This trend needs to abate in the interests of stimulating the knowledge economy. A strong, trusted IP regime both from a framework as well as enforcement perspective is critical to support an abatement of this trend and stimulate local innovation. Recognition and protection of property rights is a basic requirement for the development of a market economy. Without established intellectual property rights protection, there would be no economic incentive to bring products and services to market.

The US Chamber of Commerce's Global Intellectual Property Center (GIPC) recently published an index on Intellectual Property Rights (IPRs). The index is a tool for governments that wish to understand the key IPR factors that drive business decisions in innovative industries. South Africa's loss of three positions on the index sliding to 21st position from last year's 18th position is attributable to poor performance in the category *Patents, Related Rights, and Limitations* as well as in the category that measures *Membership and Ratification of International Treaties*.

Company 3

If there is one message that stands out clearly from the Biopharmaceutical Investment and Competitiveness Survey (BCI) it is that public policies relating to the biomedical ecosystem matter greatly to the relative attractiveness of a given economy for investment. While the policy strengths and weaknesses differ from economy to economy, the executives and managers on the ground are clear in their message that the policy trajectories taken by government officials and regulators have a real and significant impact on the investment decisions and recommendations that these executives and managers make.

This is particularly the case for emerging markets – the BCI Survey results underscore that size, costs and growth potential are not the only factors when it comes to biomedical investment attractiveness. In economies such as the BRICs, where policies affecting the biomedical environment present substantial challenges – which in many cases outweigh incremental improvements made to different areas of the ecosystem – local executives also rank these economies as struggling to compete for biomedical investment from their companies. Nevertheless, the BCI also confirms that when markets take major steps to improve key elements of the biomedical environment, investment will follow. In South Africa, not enough has been done to address several gaps, for instance in the area of IP; the Bio-Economy Strategy does not address incentives for investment through enhanced IP protection. The outcome of concerns in the area of IP and in respect of the broader policy environment has resulted in South Africa being rated as having limited ability to compete. An appropriate IP policy protects smaller enterprises and creates an environment that fosters innovation and economic advancement.



BCI - 2015: Measuring the Global Biomedical Pulse 8

The IP policy was released for comment in September 2013. Concerns were raised by various industries but in particular by the biopharmaceutical industry. The policy contains a number of measures that are not encouraging for rights holders, particularly in the life sciences. For example, it includes a more expansive use of compulsory licensing but does not address the issue of patent term restoration or the introduction of a regulatory data protection framework.

While we anxiously await the next draft of the policy, we trust that government has crafted the revised proposals in a manner that encourages and supports local innovation and entrepreneurial activity. There is substantial evidence to show that countries that entrench and enforce strong IP pillars benefit economically, and that those which have failed to do so suffer relative economic underperformance until they address this policy pillar. We hope that the revised IP policy shows South Africa's support for the former as opposed to the latter experience.

3 BEE Ownership

3.1 Company 1

The BEE ownership issue is regarded as the single biggest discriminatory policy causing difficulty for our company. The notion of using SA as a hub or springboard to service the rest of the African market is literally destroyed by this policy. Exchange controls, with BEE requirements has forced us to set up various offices elsewhere in Africa and are continuing to be a discriminatory for US companies.

3.2 Company 2

The new BBBEE Codes discriminate against multinationals regarding procurement and their import volumes and the equity clauses.

3.3 Company 3

The B-BBEE pillars, especially in relation to ownership, pose a challenge. The ownership pillar is particularly important because it impacts significantly on a Company's score, and given that the purpose of the Broad-Based Empowerment is to distribute wealth across a broad spectrum of previously disadvantaged South Africans, it is a challenge to identify/locate, potential investors with this resource base that can co-own a business. Ensuring compliance with this requirement is a big challenge and can be a very complicated process.

The following articles that appeared in the Press are self-explanatory in regard to the issues raised:

Article – Business Day, 21 July 2015 by Carol Paton

BEE gains weight in state tender proposals

GOVERNMENT tenders up to R10m will in future be evaluated only 50% on price and 50% in terms of black economic and women's empowerment and other criteria, say draft regulations published for comment by the Treasury last week.

The amendment to the regulations under the Preferential Procurement Policy Framework Act of 2000 has been an intense lobbying point for black business since they were first passed in 2011.

The new proposal will give a bigger leg-up into state contracts for black and women-owned business as well as small-and medium-sized enterprises. They fit with the government's objective of creating "black industrialists" and lowering barriers for small and medium enterprises.

However, the regulations also mean that the state will pay a large premium on all procurement less than R10m. The size of the premium will depend on how many points a company can score on the nonprice factors to compensate for its higher price.

The nonprice factors include points for: ownership by previously disadvantaged individuals; 51% ownership or more by women; 51% or more ownership by persons with a disability; enterprises that are small-or medium-sized; and enterprises that play a role in local economic development.

On the basis of the scores it is therefore possible that a black, women-owned, small or medium-sized enterprise could win a tender with a price that is almost 60% higher than a company that does not meet the non-price criteria.

The weight given to black economic empowerment (BEE) in the regulations has been a continuing debate in the government. The deputy president of the Black Business Council, Sandile Zungu, has frequently described them as the single biggest obstacle to BEE as new entrants cannot compete against multinational firms for state contracts.

However, previous finance minister Pravin Gordhan resisted attempts to revise what was known as the 90:10 and 80:20 rule in the regulations on the grounds that it would undermine value for money.
Under these rules, tenders worth more than R1m were evaluated 80% on price and 20% on BEE. Tenders over R10m were evaluated 90% on price and 10% on BEE.

The measurement of BEE under the 2011 regulations was done using the BEE scorecard. The new BEE scorecard, in which it is much harder to score the necessary points to be considered a BEE supplier will be used for tenders over R10m.

Western Cape premier Helen Zille on Monday expressed outrage at the new proposal, describing it as "legalised corruption".

Article – Times Live, 24 July 2015 by Babalo Ndenze

The government is to haul more than 1000 companies to the Labour Court for failing to transform and meet employment-equity targets

The Department of Labour Court issued the threat after receiving the Commission for Employment Equity's latest report into transformation in the workplace.

The "alarmed" acting chairman of the commission, Tabea Magodielo, said it found that white people continued to dominate top management structures, particularly in the economic hub of Gauteng. Nationally, 70% of all top managers are white.

Even more alarming to the commission was the continued recruitment of white men in numbers that outstrip the recruitment of any other race group - at about 40% of the total, compared with African men at just 14.7%.

The commission has now called for tougher action, including the docking of annual turnover, depending on a company's size.

Businesses fear the possible arrest of directors as part of the Department of Labour's drive to punish insufficient transformation.

Labour Department spokesman Sithembele Tshwete said it was not in a position to name the companies at this stage, but he confirmed that some were listed on the Johannesburg Stock Exchange.

"It's the big ones, but not all 1000. But soon we will be able to deal with that [naming them]," he said.
The commission said "the picture painted by the statistics leaves the commission with no option but to opt for rigorous enforcement mechanisms".

The chief director at the Department of Labour, Thembinkosi Mkalipi, said regulations required that racial representivity be stated in reports about training and the number of employers reporting had increased.
Magodielo said her commission had changed the theme for this year's report to "transformation makes business sense".

"We are moving at a snail's pace. It's 20 years into our democracy and if you look at the African population, we're currently sitting on 13.6% [at top management]. If we continue at this pace, 40 years into our democracy we will possibly be sitting at about 25%.

"This is disheartening and it requires quite a strong review of the way in which employer organisations are looking at transformation," said Magodielo.

Another worrying trend was how black employees continued to be overlooked for promotions and recruitment into the top echelons of companies, she said.

"We see that people are not moving to the top, it is quite clear that, come time for promotion, come time for recruitment, we see white individuals are the ones being recruited more often and they're the ones being promoted."

Magodielo noted the number of foreigners in top management had increased in the last three years.
Loane Sharp, an economist at the Free Market Foundation, said the government had become more and more "aggressive" about economic equity.

"All that this will do is increase further the cost and risk of employment," said Sharp. Companies operating in "good faith" might abandon commitments.

"The danger with employment equity is that for poor performers, performance is unnecessary and for good performers, performance is futile. Employment equity undermines the system of incentive that drives economic growth and employment," Sharp said.

4 Regulatory Impact Assessments (RIAs)

4.1 Company 1

Government has frequently ignored its own prescripts in failing to publish Regulatory Impact Assessments along with policy or legislative proposals. The best cited example in recent times is when the amendments to the labour laws were published. In this instance, the RIA was released but was ignored by government in the design of amendments to the labour laws. The RIA forms a basis of consultation and engagement with stakeholders and is one of the various checks and balances that ensure the passage of relevant and appropriate legislation. To failure to publish the RIAs shows a disregard for the views of stakeholders and undermines prescribed policy and legislative consultative processes.

4.2 Company 2

Another area of concern is the RSA government practice of failing to publish Regulatory Impact Assessments to accompany policy or legislative proposals.

One recent example pertains to amendments to the labour laws that have been published. In this example, the government performed and published an RIA, but the government did not consider the findings in the design of amendments to the labour laws.

The Regulatory Impact Assessment provides one of the most important modes of consultation with the private sector, including American company affiliates operating in South Africa. Lacking publication of the RIAs stakeholders could not meaningfully participate in prescribed policy and legislative consultative processes. This adds a dimension of unpredictability for American companies operating, employing and investing in South Africa.

5 Immigration and ease of entry clearance

As a global Company, it is important that we are able to move our employees around the globe to meet operational needs. Unfortunately, getting people in and out of South Africa is particularly difficult and a convoluted process. With the changes to the immigration regulations which officially took effect on 26th May, 2014 no application for a first work permit can be made in-country. In addition, an applicant must first register with a South African professional body prior to making the application for a work permit. This registration process pushes out processing times for work permits to about 4 months.

The processing time for general work visa is typically 21 – 26 weeks because of the involvement of the Department of Labour to meet, which is required to register the vacancies, conduct an audit process (where applicable) and ensure issuance of a certificate from the department. The process can become very protracted.

In relation to procuring Intra Company transfer visas, it is essential to have developed a plan for the transfer of skills to a South African citizen or permanent resident in country. It is usually a challenge to identify suitably qualified and experienced resources within a limited time frame or resource base in-country.

6 Revised Promotion and Protection of Investment Bill

This Bill was tabled before Parliament very recently and the effect of the bill, if passed into law, would be that the option for foreign investors to have recourse to international investor-state arbitration against the South African Government in relation to their investments in country will be eroded. As we understand it, the revised bill is aimed at standardizing and replacing various bilateral treaties entered into with the South African Government. Pursuant to the proposed bill, the South African Government "may consent to international

arbitration ... subject to the exhaustion of domestic remedies". In addition, the revised bill also excludes from the purview of investment disputes, "any law or other measure ... to promote the achievement of equality in South Africa or designed to protect or advance persons ... historically disadvantaged by unfair discrimination". The Bill also seeks to protect "domestic laws designed to regulate foreign ownership in respect of a specified sector" – including the BEE ownership targets.

The concern here is that the passing of the bill into law will effectively erode the protection of foreign investors, to some extent, and this changes the investment protection framework for the country.

7 Nationalisation - Land ownership by foreigners in South Africa

Although there is currently no restriction on the ownership of land by foreigners, the 2015 State of nation address by President Jacob Zuma's indicated that, the proposed Regulation of Land Holdings Bill (the proposed Bill) which will be submitted to Parliament during the course of this year. By virtue of the Bill 'foreign nationals' will no longer be allowed to own certain types of land in South Africa (although they will be allowed to enter into long-term leases (30-50 years) over all types of land). The proposed Bill only applies to agricultural land and not residential, commercial or industrial land.

Under the Bill environmentally sensitive lands, land with a 'security' sensitivity, land which is historic and has cultural significance, and strategic land (i.e. for land reform and socio-economic development) will be classified by law and land ownership by foreign nationals and juristic persons in these areas will be discouraged. In addition, a right of first refusal will apply in favour of another South African citizen in freehold or the state, if a foreigner has a freehold interest in the land before the Bill is passed into law and the land is deemed strategic.

8 Policy changes

The frequent change in policies discourages long term investments due to the uncertainty and unfavourable impact on long term business goals.

9 Patent Protection Erosion from Regulatory approval delays

The delays experienced in obtaining regulatory approvals from the Medicines Control Council (CC) puts the lives of South Africans at risk and substantially erodes the time pharma companies have under patent protection. Please find below the time to regulatory approval experienced in other Sub-Saharan African counties. Approvals in SA can take 4 to 5 years. While government looks to the new regulatory authority SAPHRA as the solution to this challenge, we remain unconvinced that the erosion of IP protection through delays will be alleviated. The recognition of approvals from selected regulatory authorities in other jurisdictions is definitely a step in the right direction but this would have to be done on a substantial scale if we are to change the experience of health care product and service providers and most importantly that of beneficiaries.

Country	Estimated Timelines for RA Approval	
	New registration	Major variation
Benin	24 months	4 months
Burkina Faso	12 months	6 months
Cameroon	18 to 24 months	6 to 12 months
Congo	6 months	NA*
Gabon	6 months	3 months

Country	Estimated Timelines for RA Approval	
	New registration	Major variation
Guinea	12 to 18 months	NA*
Madagascar	12 months	3 months
Mali	12 months	3 months
Mauritania	36 months (no committee assessment since 3 years)	NA*
Mauritius Island	12 - 18 months	NA*
Niger	7 months	NA*
Ivory Coast	18 months	NA*
Senegal	24 months	3 months
Chad	3 months	NA*
Togo	12 months	NA*
Nigeria	12 months	6 months
Ghana	18 months	3 months
Botswana	12 – 18 months	12 – 18 months
Ethiopia	12 – 18 months	18 – 24 months
Kenya	18 – 24 months	3 – 6 months
Malawi	3 months	3 – 6 months
Namibia	6 – 12 months	12 – 18 months
Tanzania	8 – 12 months	3 – 6 months
Uganda	18 – 24 months	3 – 6 months
Zambia	18 months	1 – 3 months
Zimbabwe	8 – 12 months	6 – 12 months

10 Regulatory Barriers

Lengthy regulatory review timelines result in de facto market access barriers for companies trying to deliver medicines to South African patients. We are increasingly concerned about the deteriorating –of-Cycle Review of South Africa Eligibility for Benefits; sup to 4-5 years, or more. The pace of new medicines approvals represents one of the slowest on the African continent, where new medicines approvals can typically take 1-2 years following licensing approval in advanced economies such as the United States or European countries. In South Africa, this is now typically double the length of time.

These delays represent significant technical barriers to trade, because South Africa requires that innovative biopharmaceutical companies obtain marketing authorization from the Medicines Control Council (MCC) prior to introducing those medicines in the market. In addition, although the South African government is taking steps to increase regulatory capacity, regulatory approval delays are further hampered by a lack of external evaluators due to a limited pool of qualified experts. More dedicated resources including an expanded pool of qualified external evaluators could help improve regulatory review timelines.

Lengthy delays in the new medicines review and registration process pose significant challenges for patients, physicians and care givers, and impede access to promising new treatments and cures for both communicable and non-communicable diseases. Delays also pose hurdles for companies employing and operating in South Africa, as they cannot market new medicines. This acts to suppress investment, innovation and employment in the sector. Competition and consumer choice are also harmed, as newer products are inhibited from entering and challenging established treatments.

Moreover, in the economic sphere, South Africa's aspirations -to boost medical tourism sector are negatively impacted if the treatment standard of care in South Africa lags behind the other countries—in our estimation, by five years or more. Finally, in terms of South Africa's industrial aspirations, an unpredictable and delayed review acts as a severe deterrent to new investment in manufacturing and manufacturing for exports. Local marketing licensing is a critical step that must be achieve prior to local production and exports.

Both the Department of Science and Technology and Department of Trade and Industry have expressed a keen interest in building up the competitiveness of the life sciences and innovative biopharmaceutical sector. Efforts to address slow reviews and approval delays can help provide regulatory certainty for innovators and enhance efforts to increase access to medicines for South African patients.

11 Final Draft Medical Device Regulations

11.1 International tendering is incorporated in the Final Draft Medical Devices

Concern is the liability of post market requirements, for Medical Devices that are registered in South Africa. International tendering may impact investment in the country.

This extrapolation is based on what has happened in the Pharma Industry.

11.2 South Africa specific Labelling requirements of medical devices

If South Africa adopts country specific labelling requirements, it increases the cost of providing Medical Devices in addition to Registration Fees.

Further, South Africa specific labelling requirements will make Redeployment of Medical Devices to other countries difficult or impossible thus increasing the scrap rate of companies especially for products.

This will likely force inventory volumes to be reduced to manage risk of expired inventory, the adverse effects could be increased risk of supply shortages.

Similar challenges faced by the Pharmaceutical Industry will plague the Medical Device industry.

11.3 Medical Device Regulations will impact how we do business in South Africa

The export market that is currently served from South African warehouses, where South Africa was the gateway to Africa will be reduced to products already registered in South Africa.

South Africa will have to initiate Bonded Warehouses to have shipment land in South Africa and transported into Africa.

We will have to look at Tier1 direct shipments to export countries.

11.4 From R642 – Amendments made to General Regulations relating to Bonusing and Sampling – Gazette No.37936 – Relates to Section 18A of the Medicine's Act

Regulations related to Section 18A Act 101 Bonusing & Sampling were published, Act 101 is amended by Act 72 of 2008 and thus these regulations are inferred to include Medical Devices. This Regulation clarifies the operation of Section 18A of the Act, which prohibits the supply of any medicine according to a bonus system, rebate system or any other incentive scheme.

Concern:

Amongst other issues are the lack of clarity of the definitions and that the regulation does not set out the criteria for testing, evaluation (and conceivably training) purposes, as opposed to samples intended as "an incentive scheme". These changes would conflict or interfere with common and accepted business practice.

Industry requests that Medical devices should have separate regulations for Section 18A to set out the criteria for testing, evaluation (and conceivably training) purposes, as opposed to samples intended as "an incentive scheme".

11.5 ***The DOH has published amendments of general regulations made in terms of the Medicals Schemes Act, 1998. R603 Medical Schemes Act, 1998, on proposed amendments to the General Regulations made in terms of this Act, will be very important to our industry, the HCPs and the patients who depend on them.***

11.5.1 ***Regulation 5:*** The treating HCP must write a discharge plan/summary, validating the diagnostic and other codes quoted in the hospital account, and this must be attached to the hospital account.

Concern :

a) If substantial information is not provided for use of specific item codes by treating HCP Suppliers may not be reimbursed for items used during the procedure which would affect business sales.
b) Logistically, this may be a nightmare to implement it at the hospital level (huge impact to the Hospital groups) as they may be a need for additional HC to implement the process

11.5.2 ***Regulation 8: Medical schemes are liable only for payment*** of services in accordance with the billing rules and tariff codes of **2006 National** Health Reference Price List (NHRPL) with Rand Value adjustments in accordance with CPI, **even though there is a published 2010 NHRPL**, which was then thrown out of court due to not being up- to- date.

Concern :

a) The medical schemes will be liable to pay for services in accordance to the 2006 billing rules, post 2006 codes may not be paid thus affecting business growth, or if paid the member will be liable for co-payment.

The Reference Price list establishment by the MOH under the National Health Act should meet the following criteria:

- Must have public consultation – did not happen in 2006, did not happen in 2009
- Must have economic sense and consider all input costs for instance additional regulatory and administrative requirements and accommodate new technologies

Carol O'Brien
Executive Director

5 August 2015