# The Treasury

## **Regulatory Review Work Programme**

## **April 2013**

#### **Release Document**

### www.treasury.govt.nz/economy/regulatory/programme

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Chair
Cabinet Economic Growth and Infrastructure Committee

# REGULATORY SYSTEMS PAPER ONE: UPDATE ON REVIEWS AND SYSTEM PERFORMANCE

#### **Proposal**

1. This paper provides an update on the current state of knowledge of regulatory design and implementation in New Zealand, including the required six monthly update on progress of the Regulatory Review Programme, and outlines the next steps to improve and utilise that knowledge. It is the first of two papers on New Zealand's regulatory systems. The second paper, 'Regulatory Systems Paper Two: Improving New Zealand's Regulatory Performance', proposes new initiatives to continue to improve New Zealand's regulatory environment and performance.

### **Executive Summary**

- 2. An efficient and effective regulatory environment is vital for supporting New Zealand's economic performance. The regulatory environment within the broadest sense includes not only the actual legislation and regulations that establish regulatory regimes, but also the fiscal and institutional frameworks which support how the government administers those regimes. After significant investment over recent years our information base on how regulatory activity is undertaken in New Zealand is improving. It is now possible to begin assembling an overall picture of what is happening within government on regulation, why, and what the effects have been.
- 3. The Regulatory Review Programme is succeeding in focusing effort on the issues that matter to this Government. The majority of that effort is being driven by a small group of agencies, which are also responsible for the bulk of New Zealand's regulatory regimes. These eight agencies are the:
- Department of Internal Affairs
- Inland Revenue Department
- Ministry of Business, Innovation and Employment
- Ministries for the Environment and Primary Industries, and
- Ministries of Health, Justice, and Transport.
- 4. The other major driver of formal regulatory activity (resulting in legislation or statutory regulation) is 'regulatory reform' but it is not yet possible to say how effectively such activity is being prioritised, or what is driving "tertiary" regulation (which

This paper uses the term 'regulation' in the broadest sense, encompassing the broader regulatory environment as outlined in paragraph two. The term 'legislation' is used when specifically referring to primary, secondary, or tertiary legislation.

consists of codes of practices, rules, guidelines etc). This situation should improve as the overall regulatory database improves, based on the regulatory scanning process. That database now covers almost all formal regulation and much tertiary activity, and should enable better agency regulatory planning.

- 5. The most significant shortfalls against Best Practice in regulation relate to considering the effects of regulation on growth; and the capability of policy agencies to design, and regulators to support, effective implementation of regulatory regimes. These shortfalls are compounded by general weaknesses across agencies in undertaking and utilising review processes, and in delivering ongoing improvements in the efficiency and effectiveness of their activities.
- 6. We therefore propose continuing to build on the growing information base of regulation in New Zealand, and address systemic shortfalls in regulatory implementation, through the measures outlined in the accompanying paper, 'Regulatory Systems Paper Two: Improving New Zealand's Regulatory Performance'.
- 7. The update on the Regulatory Review Programme recommends removing the Accident Compensation Corporation (ACC) and Air Transport review items, [1]

## Background

- 8. An efficient and effective regulatory environment is vital for supporting New Zealand's economic performance. Over the past four years we have begun to make progress in implementing new regulatory systems to ensure that the regulatory environment in New Zealand is fit-for-purpose and positioned to support economic growth. The regulatory system changes we have initiated so far have included:
- stronger regulatory impact analysis requirements
- regulatory planning to identify proposed regulatory activity each year; and
- regulatory scanning to identify where there are performance issues in the regulatory stock.

[CAB Min (09) 27/1]

- 9. Treasury has also been continuing to undertake its core regulatory quality functions, in particular through:
- Regulatory Impact Analysis (RIA) assessing significant Regulatory Impact Statements (RISs), assisting agencies in their internal RIA functions, and undertaking internal and commissioning external reviews of RIA performance
- supporting the State Services Commission (SSC) in undertaking Performance Improvement Framework (PIF) reviews of agencies, and updating the PIF model
- assembling a database of regulatory instruments and agency intentions through the regulatory scans process
- coordinating agency regulatory plans; and
- developing Best Practice Regulation principles and assessing regimes against them.

[CBC Min (08) 18/24]

- 10. Regulatory impact analysis undertaken by departments is improving; regulatory scanning is beginning to provide a better picture of the performance of the regulatory stock; and regulatory planning is illustrating the scope and priority of our regulatory activity. These changes are becoming embedded in the regulatory culture of departments, but there is still work to do to get to best practice.
- 11. The Regulatory Review Programme was established in 2009 [CAB Min (09) 6/5A]. We have now completed 17 major regulatory reviews. On 9 May 2012 the Cabinet Economic Growth and Infrastructure Committee (EGI) directed Treasury, in consultation with relevant agencies, to report back to EGI at six-monthly intervals on the progress of Regulatory Review Programme.

#### Comment

### Regulatory Performance Strategy

- 12. Treasury, in undertaking its regulatory management responsibilities, has focused to date on:
- improving agency capability and performance in embedding good regulatory impact analysis practice into policy processes for new regulation
- ensuring that Ministers have an opportunity at least annually to reassess the Government's regulatory reform priorities; and
- improving the knowledge base for Ministers and agencies of:
  - i. the state of RIA performance
  - ii. the existing stock of regulatory instruments through Regulatory Scans
  - iii. current regulatory work programmes through Regulatory Plans, and
  - iv. the quality of regulatory regimes through Best Practice Regulation (BPR) assessments.
- 13. The aim of this strategy has been to:
- shape the evolution of the regulatory management system itself
- ensure that new regulatory activity is of high quality, and focused on the areas of greatest potential gain; and
- build agency awareness of best practice, share knowledge and create effective performance measurement systems that can drive continuous improvement from regulatory design through to implementation and review.
- 14. The Treasury continues to work with departments to embed regulatory management systems. This year's cycle for regulatory planning and scanning is about to begin. Regulatory plans for 2013 are due with us and the Treasury by 28 March 2013. Regulatory scanning can now be completed by departments online throughout the year, allowing them to complete this work when resourcing best allows. Information from regulatory scanning will be analysed by the Treasury in mid 2013.

## Lessons learned from Regulatory Stock Management work to date

- 15. The slide deck in annex one (which was originally prepared for us by the Treasury) provides a report on this strategy to date, and will be a driver for taking that strategy to the next level. The focus will increasingly be on how agencies can effectively implement the regulation they have now and any future additions.
- 16. The slides draw on a wide range of sources reflecting the complexity of regulatory performance, which depends on the underlying regime design, the capability of the agency and any delegated regulatory bodies, skills and resourcing of regulated parties, and consumer responses among other factors. Those sources include:
- the Regulatory Review Programme both the priority setting process and the progress reports
- Performance Improvement Framework (PIF) assessments of agencies
- Best Practice Regulation assessments
- Annual Regulatory Plans
- the Regulatory Scans database
- System Reports on agency internal RIA arrangements; and
- RIA statistics and assessments of compliance by Treasury and external reviewers.
- 17. The key messages from this analysis are summarised in the following table, and laid out in full in the attached slides.

	Diagnosis	Next Steps
Priorities	The review programme draws effectively on multiple perspectives to shape choices. Regulatory proposals are dominated by miscellaneous "regulatory reform" measures.	Need to better connect the review programme to agency regulatory plans, and those plans to the legislative programme, to improve prioritisation of regulatory reform work.
Outcomes	Key weaknesses in regimes vs. best practice expectations relate to:  considering the impact of regulation on growth, and regulator capability.	Improve BPR assessments on capability of regulators. Build capability factors into regulatory planning.
RIA	Agencies are over-estimating the quality of RIA.	Update guidance and engage further with agencies on expectations.
System	Agencies are weak in future planning, continuous improvement, and taking a lifecycle approach to regulation.	Strengthen PIF expectations for review and regulatory impact. Set and enforce expectations for regulatory implementation.

	Diagnosis	Next Steps
Major	8 agencies are responsible for	Focus engagement on the:
regulators	most regulatory policy.	<ul> <li>Ministry of Business, Innovation and Employment</li> <li>Ministry for the Environment</li> <li>Ministry of Health</li> <li>Inland Revenue Department</li> <li>Department of Internal Affairs</li> <li>Ministry of Justice</li> <li>Ministry for Primary Industries, and</li> <li>Ministry of Transport.</li> </ul>

## Regulatory Review Programme

- 18. Annex two outlines the six monthly update on the Regulatory Review Programme. This update recommends that:
- Accident Compensation Corporation (ACC) is removed as a review item —
  Cabinet agreed in July to defer consideration of proposals to introduce more
  choice and engagement in workplace accident compensation. The priority for
  ACC is now on operational initiatives to improve trust and confidence in ACC in
  response to privacy concerns.
- Air Transport is removed as a review item this review is completed with policy decisions adopted in August.

[1]

19. We have not added any items to the overall Regulatory Review Programme. Future changes to the Regulatory Review Programme will be considered as part of the proposed annual report on the regulatory management system (refer to paragraph 18 of paper two).

### Regulatory Implementation

- 20. A common trend in the work reported on here, and in recent discussions of regulatory regime performance, has been shortfalls in the design and practice of regulatory implementation. As a result:
- Treasury will be focusing on regulatory implementation issues in Regulatory Plans and Scans, Best Practice Regulation assessments and other guidance and monitoring activities in the first half of 2013 and 2013-14.
- The accompanying paper, Regulatory Systems Paper Two: Improving New Zealand's Regulatory Performance, proposes a set of expectations for all agencies on regulatory implementation which will be monitored by central agencies led by the Treasury. These expectations draw on the reporting discussed here and observed best practice, and are consistent with the proposed State Sector Act changes currently before Parliament.

#### Consultation

- 21. This paper was prepared by the Treasury. The following departments were consulted on the contents of this paper and provided comment on the paper: the Department of Internal Affairs, the Ministry for Primary Industries, the Ministry of Business, Innovation and Employment, and the Ministry of Justice.
- 22. The following departments were consulted on the contents of this paper and had no comment: the Canterbury Earthquake Recovery Authority, the Crown Law Office, the Department of Conservation, the Department of Corrections, the Education Review Office, the Government Communications Security Bureau, the Inland Revenue Department, Land Information New Zealand, the Ministry for Culture and Heritage, the Ministry of Defence, the Ministry for the Environment, the Ministry of Education, the Ministry of Foreign Affairs and Trade, the Ministry of Health, the Ministry of Pacific Island Affairs, the Ministry of Social Development, the Ministry of Transport, the Ministry of Women's Affairs, the New Zealand Customs Service, the New Zealand Defence Force, the New Zealand Police, the New Zealand Security Intelligence Service, the Office of the Clerk of the House of Representatives, the Parliamentary Counsel Office, the Serious Fraud Office, the State Services Commission, Statistics New Zealand, and Te Puni Kokiri. The Department of Prime Minister and Cabinet was informed.

### **Financial Implications**

23. This paper has no direct financial implications.

## **Human Rights**

24. The proposals outlined in this paper appear to be consistent with the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

#### **Legislative Implications**

25. This paper has no legislative implications.

#### **Regulatory Impact Analysis**

26. This paper does not have any regulatory implications.

### **Publicity**

27. No publicity is planned at this stage. Any future publicity will be managed by the Minister of Finance and the Minister for Regulatory Reform.

#### Recommendations

- 28. The Minister of Finance and the Minister for Regulatory Reform recommend that the Committee:
  - 1. **endorse** Treasury's regulatory performance strategy to:
    - 1.1. prioritise new regulation in terms of net benefits to New Zealanders
    - 1.2. measure the performance of existing regulation against best practice
    - 1.3. assess and improve agency capability to design and implement regulation,

- 2. **note** that this regulatory strategy is fully consistent with the Government's Better Public Services programme and the combined work of Treasury, the State Services Commission and the Department of Prime Minister and Cabinet to lead improved state sector performance
- 3. **note** the attached slides in annex one which collate the overall picture on performance of regulatory regimes and agencies
- 4. **note** that regulatory plans for 2013 are due with the Ministers of Finance and Regulatory Reform and the Treasury on 28 March 2013
- 5. **note** that Treasury will be focusing on regulatory implementation issues in regulatory plans and scans, Best Practice Regulation assessments and other guidance and monitoring activities in the first half of 2013 and 2013-14
- 6. **note** that the accompanying paper, Regulatory Systems Paper Two: Improving New Zealand's Regulatory Performance, proposes a set of expectations for all agencies on regulatory implementation
- 7. **note** the attached six monthly progress report to Cabinet on the Regulatory Review Programme (refer annex two)
- 8. **agree** to remove ACC choice and engagement in workplace accident compensation from the Regulatory Review Programme
- 9. **agree** to remove the completed Air Transport review from the Regulatory Review Programme

[1]

Hon Bill English	Hon John Banks CNZM, QSO
Minister of Finance	Minister for Regulatory Reform
Date:	Date:

Annex One: Slides on Regulatory Stock Management (attached)



# Regulatory Stock Management

What have we learned so far?

How will we use that knowledge to improve New Zealand's regulatory systems and regimes?

Regulatory Quality Team, The Treasury
Presented to MOF 5 November 2012

## **GOAL**

# Improving the quality of regulatory activity in order to improve the living standards of New Zealanders.

## **Impacts Sought and Tracked:**

- strategic regulatory work programmes, and annual priorities, deliver maximum net benefits to New Zealanders
- o regulatory regimes are moving closer to best practice.
- o regulation in New Zealand is effectively supporting economic growth.

## **Required Capabilities:**

- measure the quality of regulatory systems and regimes
- track agency capability and toolkit to drive stock improvement, and address gaps

use data to improve processes and analysis and create feedback loops into Ministerial priority setting, and agency planning and practice.

Regulatory Review Programme

Best Practice Regulation Principles & Assessments

**PIF Assessments** 

Plans, Scans & System Reports

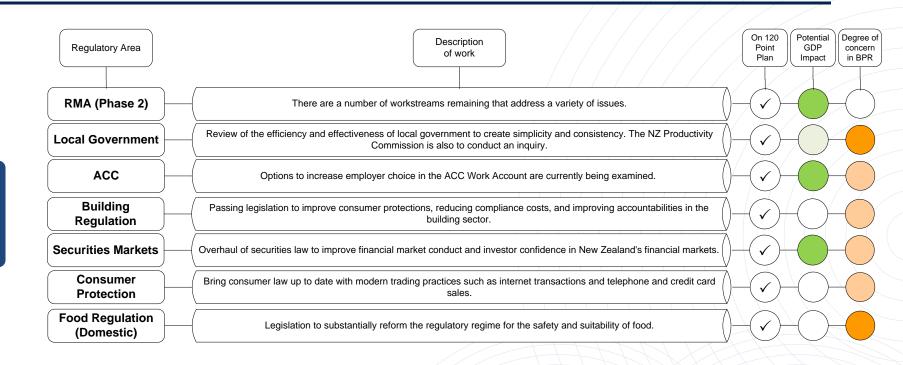
Regulatory Impact Analysis

Cabinet Minutes & Regulatory Standards Bill

# **Guiding Regulatory Priorities**

## Core mechanism is:

- identification of diagnoses from multiple sources
- feeding that overall perspective into key Government decision points such as the Regulatory Review Programme and Business Growth Agenda



A sign of success is high degree of consistency between the key drivers of regulatory priorities: Government commitments, GDP impact, Best Practice Regulation Assessments.

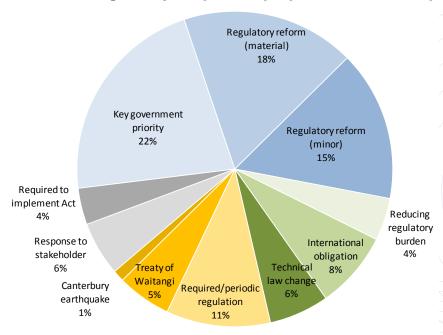
better connect plans and assessments to regulatory review programme

# **Tracking Revealed Priorities**

Regulatory policy activity is primarily driven by Government priorities and regulatory reform objectives. However, the quality of both drivers is questionable.

- There is a relatively high volume of government "priority activity" at 22%, which may reflect either good use of Parliamentary time or too many priorities.
- Regulatory reform, at 33%, reflects a large volume of un-prioritised, often minor, activity, which is of concern given the crowded order paper.
- The regulatory planning process misses much secondary/tertiary activity. What is driving activity at that level is not apparent.

## **Drivers of Regulatory Proposals: proportion from 2012 plans**



improve monitoring of regulatory activity and look at better connecting plans to the legislative programme

# Tracking the Outcomes - where are regulatory regimes not delivering?

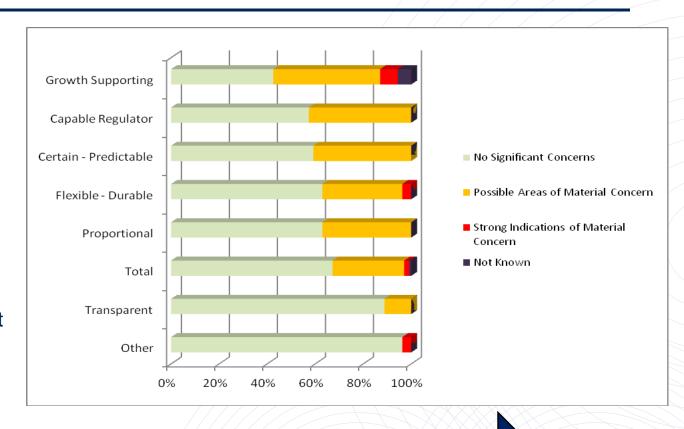
Best Practice Regulation Assessments identify problems in assessing impacts on growth, and ensuring that regulators can and do provide the right balance of guidance and enforcement to achieve least-cost compliance.

So how well placed are agencies to address those problems?

We know what aspects of regimes need most focus:

- growth impact
- regulator capability.

Growth impact is used to set priorities but what about capability?

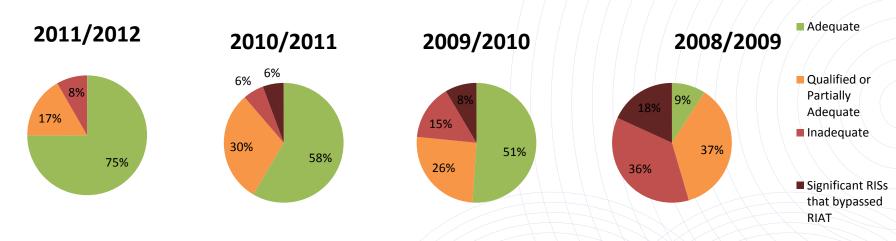


(1) refresh the principles (2) signal to agencies that these assessments are now a part of the system, and are expected to shape regulatory planning

# **Tracking the Quality of the Regulatory Activity**

We can use a combination of Treasury Assessments of Regulatory Impact Statements and external reviews track the quality of regulatory proposals.

We know the quality of regulatory impact analysis is improving (but has some way to go). External review suggests that agencies are over-estimating the quality of self-assessed regulatory impact statements. This suggests a need for greater focus on the 8 key regulatory policy agencies.

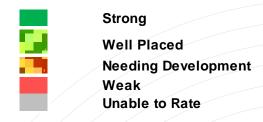


(1) update RIA guidance and (2) assess any changes needed to how RQT's RIA processes, and engage with key agencies on expectations

# **Across the System as a Whole**

## Particular challenges relate to:

- planning for future needs and continuous improvement;
- taking a lifecycle approach from policy design through to implementation, compliance and review.



## **Published Performance Improvement Framework Reports**

Element Review Improving Efficiency and Effectiveness	MFAT DOC TPK LINZ NZTA NZTE TSY MS	SD IRD MOE MWA MPIA SNZ CLO MED ERO MOJ MOD
Regulatory impact		
R R	trong or Well Placed Leview Legulatory Impact Improving Efficiency and Effectiveness	38% 52% 38% 24%
The weakest area of performance is efficiency – even before the upgrade. Before the impact of the global financial crisis, the public sector did not seem to be under much financial pressure at all.  Even if it was, however, strong performance requires a deep understanding of the business and operating models that support that business.  Improving efficiency also requires good performance measures and a culture of continuous improvement that is able to learn from experience.	Inland Revenue scored Strong every element - illustrates the potent connection amongst them.  In IRD we found a systemat analytical, quantitative and evidence based approach to managing the elements of performance was he combined with a desire for continuous improvement.  IRD also had strong utilisation a leveraging of the finance, informati management and asset management functions. These key support functions are seen as strategic partners.	The best agencies demonstrate that they value learning, innovation and continuous improvement.  They expect and support on-going improvement and adaption through measurement, testing and review.

(1) contribute to SSC's revision of the Review and Regulatory Impact elements of PIF to raise expectations (2) continue to provide input to PIF reviews

# **The 8 Major Regulatory Policy Agencies**

Note: other agencies also have major roles in setting priorities (e.g. DPMC) or implementing regimes (e.g. Customs, Police). This analysis relates only to agencies with major policy roles.

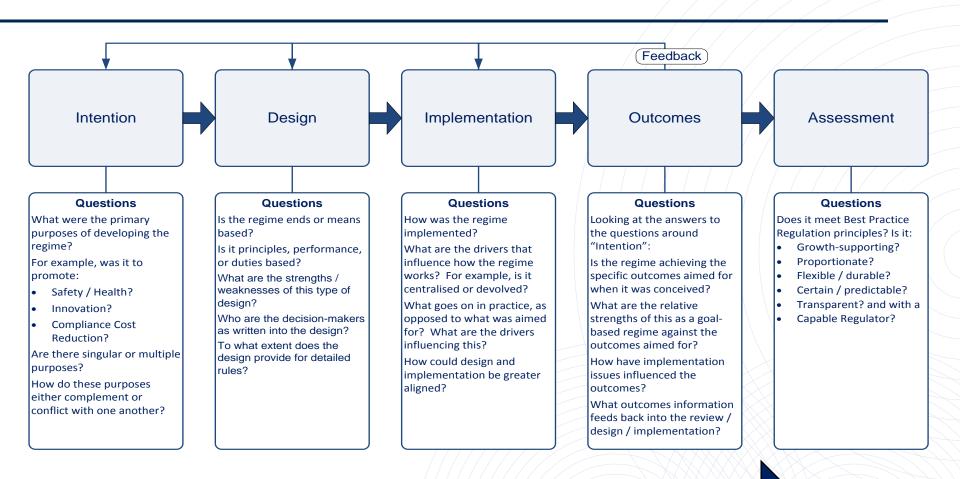
Agency	Significant RISs	BPR Regimes	Regulatory Priorities – past or present & watching briefs
MBIE	44	24	Current – ACC, OSH [1] Past - Building, Capital Markets, Consumer Protection, Electricity, Employment Relations, Export Barriers, Holidays Act, Overseas Investment, Securities Markets, Telecoms, Weather-tight Homes
MfE	31	6	Current – RMA [1] Past - Air Quality, Emissions Trading
МоН	8	3	
DIA	5	3	Current – Local Government
IRD	8	2	
MoJ	7	2	Past - Foreshore and Seabed
MPI	7	6	Past - Dairy, Food Regulation (domestic)
MOT	8	2	Current - Air Transport, Vehicle Licensing [1]
Other	?	6	Current - Teacher Workforce

Engage with the key agencies in using regulatory review and planning to focus medium term regulatory reform efforts

## A Lifecycle Approach to Regulation

There is demand for certainty over flexibility in regulation but the answers are very situation specific, depending heavily on:

- knowledge and capability throughout the regulatory chain, and
- cycle of learning and change –enactment is only the start of a learning process.



build and integrate our expertise on regulatory implementation, review and institutional design factors, as part of central agencies' focus on agency performance

## What next?

Filling out, consulting on, and delivering our stock management strategy

## Driving state sector regulatory priorities

Working with <u>Regulatory Leaders</u> from key regulatory policy agencies to set a medium term direction and vision.

Context is state sector change and sharing what we have learned from RIA, Plans/Scans, Best Practice Regulation and PIF.

Focus is strategic and medium term:

- shaping the evolution of the regulatory management system – what has helped and what is needed next
- ensuring that new regulatory activity is focused on what will best support improved living standards for New Zealanders

# Delivering an effective regulatory management system

Working with <u>Regulatory Contacts</u> from all agencies – policy, RIA, regulators – to build capability, share knowledge, and connect day-to-day work with medium term vision.

Context is consulting on and setting expectations, sharing lessons and best practice and reporting on performance.

Focus is operational:

- what does Treasury ask for and is it at the right level,
- what is best practice across agencies,
- how can we best work together?

## **Annex Two: Update on the Regulatory Review Programme**

Reviews that are finished or we recommend removing from the work programme

Review	Progress update
ACC	In July 2012 Cabinet agreed to defer consideration on proposals to introduce more choice and engagement in workplace accident compensation. Officials are not currently working on proposals as the emphasis in ACC is now on operational initiatives to improve trust and confidence in ACC in response to privacy concerns.
Air Transport	Policy adopted in August 2012.

Reviews we recommend adding to the work programme

Review	Progress update
[1]	

Reviews that continue to be on the work programme				
Review	Progress update			
RMA (Phase 2)	All RMA			
Review: participation, and specific interfaces	Ministers made final policy decisions for Bill One of RMA reform (fast discrete improvements to the RMA and a streamlined Auckland Unitary Plan process) in September 2012. This Bill had its first reading in December 2012.			
between the RMA and other	Ministers have now agreed to release a public discussion document on more substantive RMA reform (Bill Two) in March 2013.			
legislation.	This is with a view to introducing an RMA reform Bill in mid to late 2013, meaning there is now no scope for slippage in this work programme			
	Freshwater Reform			
	Reforms are aimed at ensuring more efficient use of freshwater to achieve better environmental and economic outcomes. Work-streams focus on objectives and limit setting, governance, managing within quantity limits, and managing within quality limits			
	The Land and Water Forum reported to Ministers with recommendations in October 2012.			
	Ministers considered a suite of Cabinet papers on all work-streams in November/December 2012, with a view to releasing a public discussion document on key proposals in early 2013. Significant further policy analysis will need to be undertaken on the costs and benefits of regulatory measures ahead of final decisions.			
	Any legislative changes required are intended to be given effect through Bill Two of RMA reform in 2013.			

Review	Progress update
Local Government Review	The Local Government Act 2002 Amendment Bill was passed in late November 2012 giving effect to Phase 1 of the Better Local Government (BLG) reforms. Phase 2 of the reforms is underway, and has been expanded to include work streams which are part of the cross-agency Housing Affordability work programme – including the development of options for a local government performance framework.
	The Local Government Efficiency Taskforce reported to the Minister in late November 2012. The Local Government Expert Advisory Group on Infrastructure is due to report to the Minster in mid February 2013. The Productivity Commission's report on local government regulatory performance is due in May 2013. Appropriate recommendations from these groups, along with outcomes of other Phase 2 work streams, may be progressed through a further Local Government Act amendment bill in the second half of 2013. Governance arrangements for BLG have been designed to ensure crossagency engagement.
	In addition to the BLG programme there are a number of other current and upcoming reforms which will impact on local government. These include reforms relating to resource management, housing affordability, the Building Act and land transport management. Understanding the collective impact of these reforms on the framework and operation of local government, and ensuring that they are coordinated and aligned, will be important.
Vehicle Licensing	Cabinet has agreed to changes to the vehicle inspection and licensing regime, these include:
	<ul> <li>Adopting a revised Warrant of Fitness regime with net present value of \$1.8 billion over 30 years. This package will be implemented by 1 July 2014 or earlier.</li> </ul>
	Changes to the Certificate of Fitness regime, subject to further NZ Transport Agency review of its policies, to incentivise good safety performance. These changes are estimated to have net social benefit of \$160-\$460 million over 30 years and will be in place by 1 July 2014 or earlier.
	Further work is also to be completed:
	The NZ Transport Agency intends to take a willing compliance approach to Vehicle Licensing in order to reduce enforcement costs. Following the NZ Transport agency review, the Associate Minister of Transport will report back to Cabinet with a proposal by 30 September 2013.
	The NZ Transport Agency will review the operator licensing regime and the Associate Minister of Transport to report back to Cabinet by 30 September 2013 with specific proposals to improve transport services licensing, including any funding implications and proposed changes to legislation.
Teacher Workforce	A final report on a review of the New Zealand Teachers Council was due with the Minister in November standards framework. [1]
Occupational Safety and	The Taskforce has released a comprehensive consultation document, with a closing date for submissions of 26 November 2012.
Health	Cabinet has also recently agreed to the recommendations of The Pike River Royal Commission, with the exception of a recommendation to establish a new Crown agent focusing solely on health and safety. Cabinet has directed that further work be done on this option, for final decisions to be made after the Taskforce's report back in April 2013.
	Note the progress made so far by the Taskforce, and that a comprehensive set of recommendations will follow its report back in April 2013.

Reviews that cont [1]	tinue to be on the list of watching briefs	
[2], [3], [4]	·	4
[1]	1	<del></del> I