



Government of **Western Australia**
Department of **Mines, Industry Regulation and Safety**

Assessment Timeframes for Mining Environmental Applications

2022-23 Analysis

Resource and Environmental Compliance Division

November 2023

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1. EXECUTIVE SUMMARY

The Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) has undertaken a detailed analysis of assessment processes and timeframes relating to mining applications received and processed by DEMIRS in 2022-23. Undertaken annually, this analysis provides a summary of DEMIRS' performance against its key performance targets, including a time series analysis.

The report seeks to provide transparency on the total processing time and trend analysis of this data to identify improvements for the overall user experience and to reduce total timeframes. This report presents an analysis of DEMIRS' performance, stop the clock events, and end-to-end timeframes.

A summary of this year's analysis finding is below.

- DEMIRS received a total of 3,544 (down 9.1 per cent on 2021-22 Mining Environmental Approvals (MEAs) applications and finalised a total of 3,497 applications (down 2.5 per cent on 2021-22).
- DEMIRS received 3,161 Programme of Work (PoW) applications and finalised a total of 3,123. Of the PoWs finalised, 77.1 per cent were finalised within the target timeframe of 15 business days. On average, PoWs took 11 days to be processed by DEMIRS with an average end-to-end timeframe of 23 days, down from 22 and 32 days respectively in 2021-22.
- DEMIRS received 298 Mining Proposals (MP) and finalised a total 242. Of the MPs finalised, 45.5 per cent were finalised within the target timeframe of 30 business days. On average, MPs took 51 days to be processed by DEMIRS with an average end-to-end timeframe of 136 days, up from 41 and 115 days respectively in 2021-22.
- DEMIRS received 85 Native Vegetation Clearing Permits (NVCPs) and finalised a total of 132. Of the NVCPs finalised, 59.1 per cent were finalised within the target timeframe of 60 calendar days. On average, NVCPs took 80 calendar days to be processed by DEMIRS with an average end-to-end timeframe of 149 calendar days. This is a decrease in DEMIRS' processing time of 108 calendar days in 2021-22 but an increase in the end-to-end timeframe of 139 calendar days.

DEMIRS is currently pursuing a number of reforms which will ease pressure on the approval process to improve processing timeframes for industry. These reforms are summarised below.

- Policy and legislation reform
 - The *Mining Amendment Act 2022* will amend the *Mining Act 1978* to introduce Eligible Mining Activity (EMA) approvals and Mining Development and Closure Proposals (MDCPs). An EMA will be an alternative authorisation approval for eligible mine activities that would otherwise require assessment via a PoW, subsequently reducing the assessment queue. A MDCP will be a single application document that consolidates the information requirements of an MP and Mine Closure Plan (MCP), streamlining the information requirements and the assessment of mining assessments by removing the need to assess two separate documents. Future stand-alone MCPs will then be submitted as per the timeframes included in the resultant Approvals Statement.

- DEMIRS will soon release a Programme of Work Guidance document to provide greater transparency and clarity around the information requirements for submitting a PoW application to reduce requests for further information, as well as a guidance document clarifying DEMIRS' expectations for the rehabilitation of exploration disturbances.
- Digital transformation
 - DEMIRS is currently undertaking a digital transformation program to replace the existing legacy environmental assessment and regulation systems and introduce Resources Online, a consolidated solution that provides a single user portal with various required interfaces and cloud technology. Resources Online will improve the transparency of the assessment progress by allowing the proponent to track their applications from submission to decision. In addition to this Resources Online will simplify the approval process by providing live guidance at the time of lodgement to reduce requests for information and enabling for easier data sharing when referring an application to external agencies.

2. PURPOSE

This document details DEMIRS' performance with regards to the processing of MEAs within the Western Australian mining industry.

- a. **Overview of the MEA process:** an outline of the approval process and DMIRS' target timeframes for finalising MEA applications.
- b. **2022-23 MEA timeframes analysis – Overall performance:** a detailed trend analysis of DMIRS' MEA processing data to provide an overview of DEMIRS' performance.
- c. **2022-23 MEA timeframes analysis – 'Stop the clock' events:** understanding the performance for those workflow components for on-hold or 'stop-the-clock' events that occur outside of DEMIRS' key performance target timeframes.
- d. **10-year trends on end-to-end timeframes:** a trend analysis of end-to-end timeframes over the past years to provide a holistic overview of the approval journey for transparency of end-to-end timeframes.
- e. **2022-23 policy and regulation reform:** an overview highlighting the current and future reform that will assist in reducing the total processing time for MEAs.
- f. **Fast Tracking Mining Approvals Strategy:** an overview of the Fast Tracking Mining Approval Strategy and how it will assist the resources industry and reduce MEA assessment timeframes.

3. OVERVIEW OF THE MINING ENVIRONMENTAL APPROVAL PROCESS

3.1. Mining environmental approvals

In order to undertake mining activities in Western Australia, proponents must first obtain MEAs from DEMIRS. The approval process aims to ensure activities are environmentally acceptable and promote responsible mining activities to ensure a sustainable Western Australia for future generations. This report focuses specifically on PoWs, MPs and NVCPs.

Under the *Mining Act 1978*, DEMIRS is granted the responsibility for approving and regulating PoWs and MPs while the authorisation to make decisions on NVCPs has been delegated by the Department of Water and Environmental Regulation (DWER) to DEMIRS under s.20 of the *Environmental Protection Act 1986*.

A brief summary of these approvals is below.

- a. **Programme of Work:** required by explorers and prospectors in order to undertake ground disturbing activities with mechanised equipment on a mining tenement.
- b. **Mining Proposal:** required before undertaking mining operations and includes a mine closure plan.
- c. **Native Vegetation Clearing Permit:** required for the clearing of native vegetation where the proponent is not exempt under the *Environmental Protection Act 1986* or Environmental Protection (Clearing of Native Vegetation) Regulations 2004.

Further information on these approvals can be found on the [Mining environmental approvals web page](#).

3.2. Target timeframes

DEMIRS aims to finalise mining applications in line with the key performance target timeframes identified in Table 1. In March 2020, DEMIRS announced the reduction in approval timeframes for PoW from 30 business day to 15 business days, to be introduced from 1 July 2020. With regards to NVCP, 2022-23 is the final year in which they will have a target timeframe of 60 calendar days. From 2023-34 onwards, the target timeframe will be 60 business days to align with DWER who currently measure the timeframe in business days.

Table 1 – Mining environmental approval target timeframes

Application type	Approval target timeframe
Programmes of Work	80% within 15 business days (as of 1 July 2020)
Mining Proposals	80% within 30 business days
Native Vegetation Clearing Permit	80% within 60 calendar days

These timeframes refer only to the agency’s performance metrics. That is, they exclude the time taken by workflow events and processes that occur outside of the agency’s direct line of control. This includes, but is not limited to, awaiting further information from a proponent or awaiting advice from other agencies such as DWER, the Department of Biodiversity, Conservation and Attractions and Department of Planning, Lands and Heritage.

When a workflow event is outside DEMIRS’ direct control, the time taken during these periods is not included when calculating the agency’s approval performance. In effect, the ‘clock is stopped’ then started again when DEMIRS receives agency advice or further information from a proponent. As such, the publicly reported quarterly performance against target timeframes does not provide the complete view of the time taken for an application to be finalised from lodgement to decision. This report seeks to expand upon the quarterly performance reports published by DEMIRS, providing a more detailed analysis of mining environmental assessments administered by DEMIRS.

4. 2022-23 MINING ENVIRONMENTAL APPROVAL ANALYSIS – OVERALL PERFORMANCE

4.1. Applications received

From 1 July 2022 to 30 June 2023, the Resource and Environmental Compliance (REC) Division received a total of 3,603 applications, comprising of PoW, MP and NVCP. This is a decrease of 29 (-8 per cent) applications received on the 2021-22 financial year.

Table 2 – Applications received in 2020-21 and 2021-22

Application type	2021-22	2022-23	Difference	% Change
Programme of Work	3,394	3,161	-233	-6.9%
Mining Proposal	359	298	-61	-17.0%
Native Vegetation Clearing Permit	146	144	-2	-1.4%

4.2. Applications finalised

From 1 July 2022 to 30 June 2023, the REC Division finalised a total of 3,500 applications comprising of PoWs, MPs and NVCPs. This is a decrease of 91 (-3 per cent) applications finalised on the 2021-22 financial year.

Table 3 – Applications finalised in 2020-21 and 2021-22

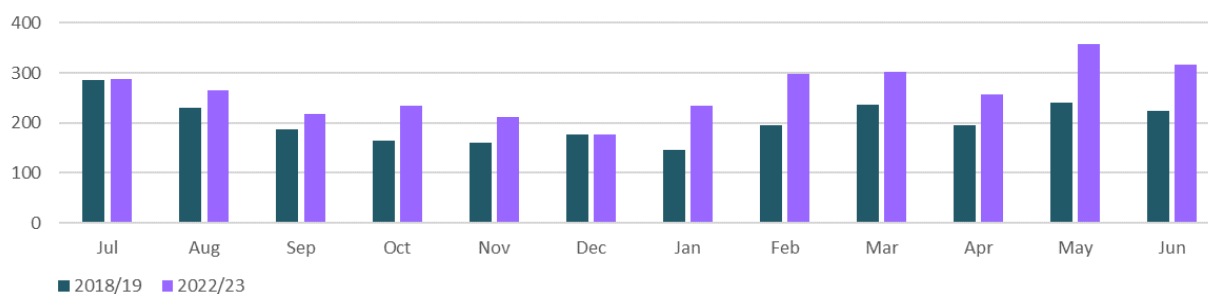
Application type	2021-22	2022-23	Difference	% Change
Programme of Work	3,155	3,123	-32	-1.0%
Mining Proposal	298	242	-56	-18.8%
Native Vegetation Clearing Permit	138	135	-3	-2.2%

4.3. PoW

Throughout the 2022-23 financial year, DEMIRS received a total of 3,394 PoW applications. This is a decrease of 233 applications (-6.9 per cent) on the 2021-22 financial year and an increase of 717 (29.3 per cent) on the 2018-19 financial year five years ago.

As depicted in Figure 1, the amount of PoWs received has a slight seasonal trend with volumes increasing to reach peaks in the middle of the year before decreasing to lows around December and January. It can therefore be assumed that the assessment queue is largest from May to August when there are large volumes received.

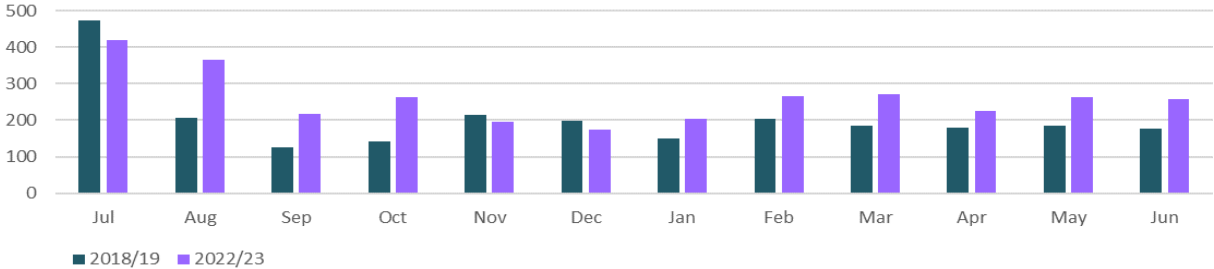
Figure 1 – PoW received in 2018-19 and 2022-23



Despite the 29.3 per cent increase in PoWs received, DEMIRS' completion rate has only marginally decreased from 1.00 in 2018-19 to 0.99 in 2022-23 where for every application

received, 0.99 applications are finalised. It is typically expected that completion rates will fall as more PoWs are received so it is a promising sign that a 29.3 per cent increase in PoWs has only resulted in a one per cent fall in completion rates. This indicates that, for the most part, DEMIRS has been able to effectively manage the increase in demand for PoWs over the years.

Figure 2 – PoWs finalised in 2018-19 and 2022-23



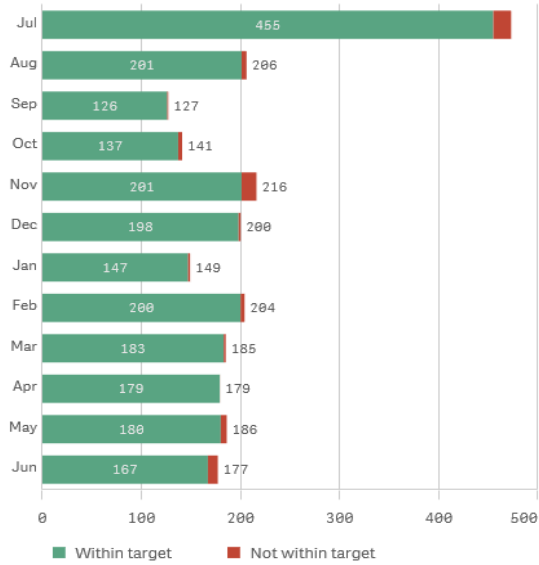
Of the PoWs finalised in 2022-23, 77.1 per cent were finalised within the target timeframe of 15 business days with applications taking an average of 11 business days to be processed by DEMIRS. This is below DEMIRS’ target to complete 80 per cent of all applications within the timeframe and is a significant drop from 2018-19 where 97.2 per cent of PoW applications were finished with the target. Whilst this may appear alarming, it is a significant improvement on 2021-22 where just 37.7 per cent of PoWs were completed within the target timeframe of 15 business days.

In 2021-22 DEMIRS experienced an influx of PoW applications coupled with a period of resourcing constraint, which created a backlog of applications and put pressure on timeframes. As shown in Figure 4 below, this backlog was still present at the start of the 2022-23 financial year with the majority of applications being completed outside of the target. As the year went on however, this backlog eased and this is reflected in the remainder of the graph with the majority of applications each month now being processed within 15 business days. The exception to this is the month of June.

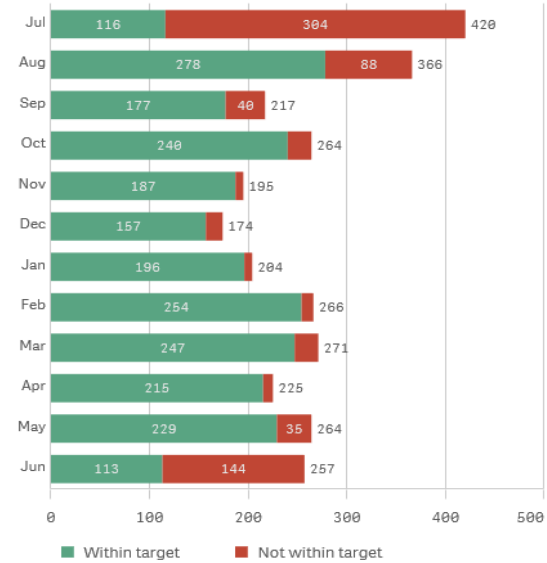
In addition to the increase of applications coming through the department, one of the main reasons for the increase in PoWs finalised outside of the target timeframe since 2018-19 is due to a change in PoW target timeframes from 30 business days to 15 business days in July 2020.

Figures 3 and 4 – PoWs finalised within the target in 2018-19 and 2022-23

Pow's finalised in 2018/19



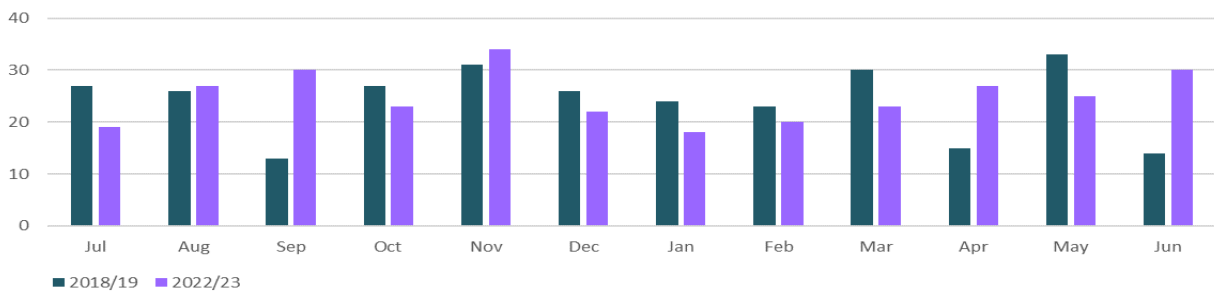
Pow's finalised in 2022/23



4.4. MPs

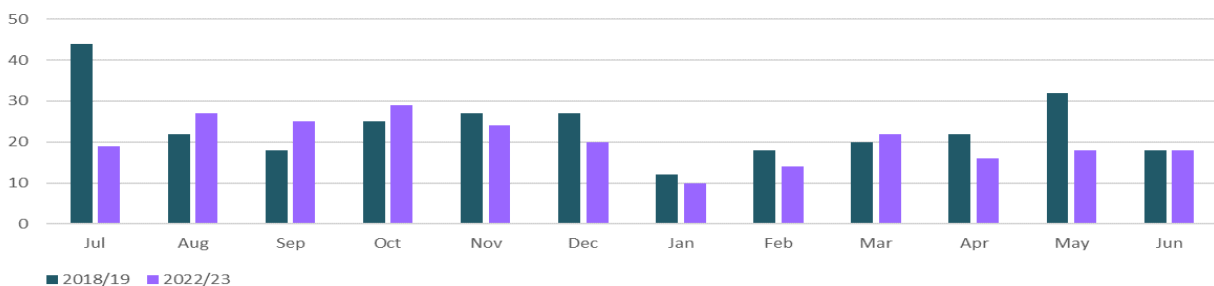
From July 1 2022 to June 30 2023, DMIRS received a total of 298 MP applications. This is a decrease of 61 (-17.0 per cent) on the financial year and a decrease of 7 (-2.3 per cent) on the 2018-19 financial year five years ago. It should be noted that the declining trend in MPs received is at least in part a result of DEMIRS increasing the flexibility in MP approvals via successive revisions to the guidelines.

Figure 5 – MPs received in 2018-19 and 2022-23



Despite there being a decrease in MPs received, there has also been a fall in the completion rate from 0.98 in 2018-19 to just 0.81 in 2022-23. This can largely be attributed to the resourcing constraints experienced by DEMIRS during this time.

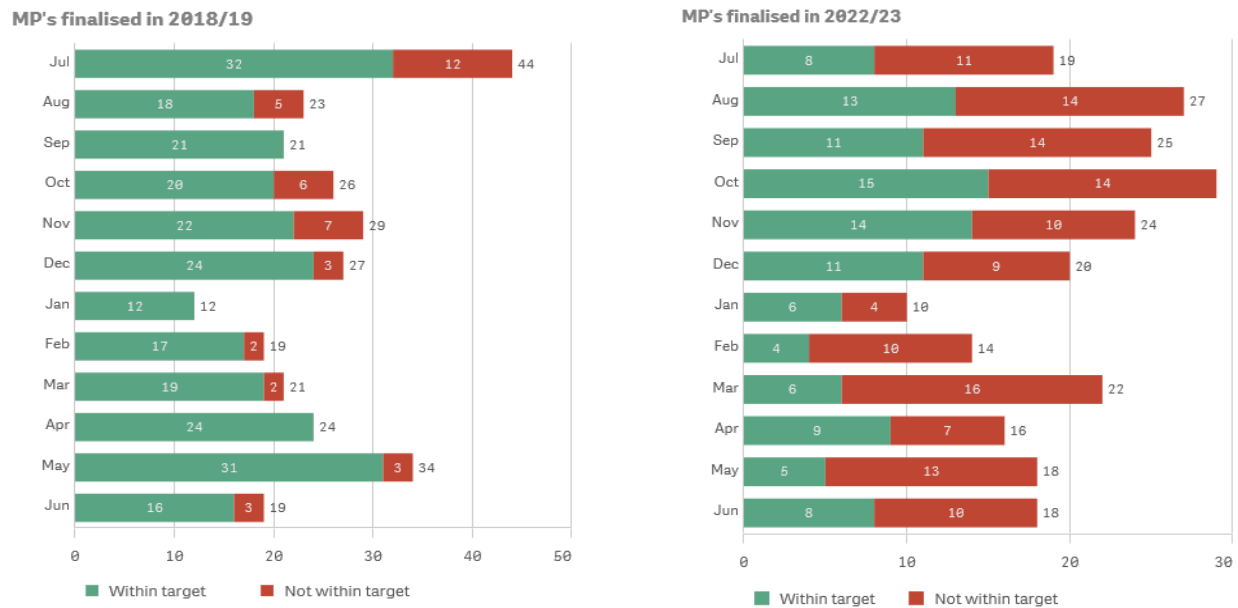
Figure 6 – MPs finalised in 2018-19 and 2022-23



Of the MPs finalised in 2022-23, just 45.5 per cent were finalised within the target timeframe of 30 business days with applications taking an average of 80 days to be processed by DEMIRS. Similar to PoWs, this is below DEMIRS' target to complete 80 per cent of all applications within

the timeframe. This is a 40.1 per cent decrease from 2018-19 where 85.6 per cent of all finalised MPs were processed within the target.

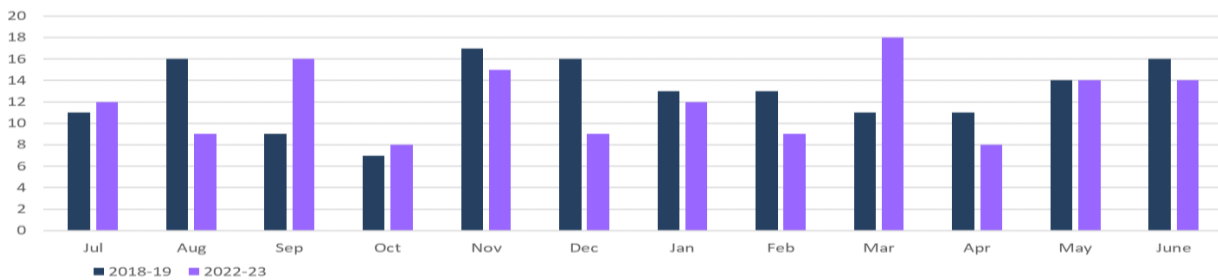
Figures 7 and 8 – MPs finalised within the target in 2018-19 and 2022-23



4.5. NVCPs

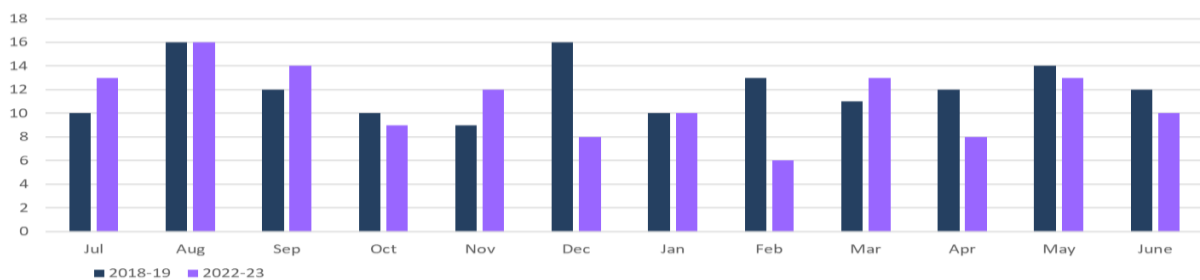
For the 2022-23 financial year DMIRS received a total of 144 NVCPs. This is a fall of two (1.4 per cent) and 10 (6.5 per cent) on the 2021-22 and 2018-19 financial years respectively.

Figure 9 – NVCPs received in 2018-19 and 2022-23



The completion rate for NVCP applications has remained relatively steady, dropping only three per cent from 0.94 in 2021-22 to 0.92 for 2022-23. This is likely due to the fact that the change in applications received has also been minimal.

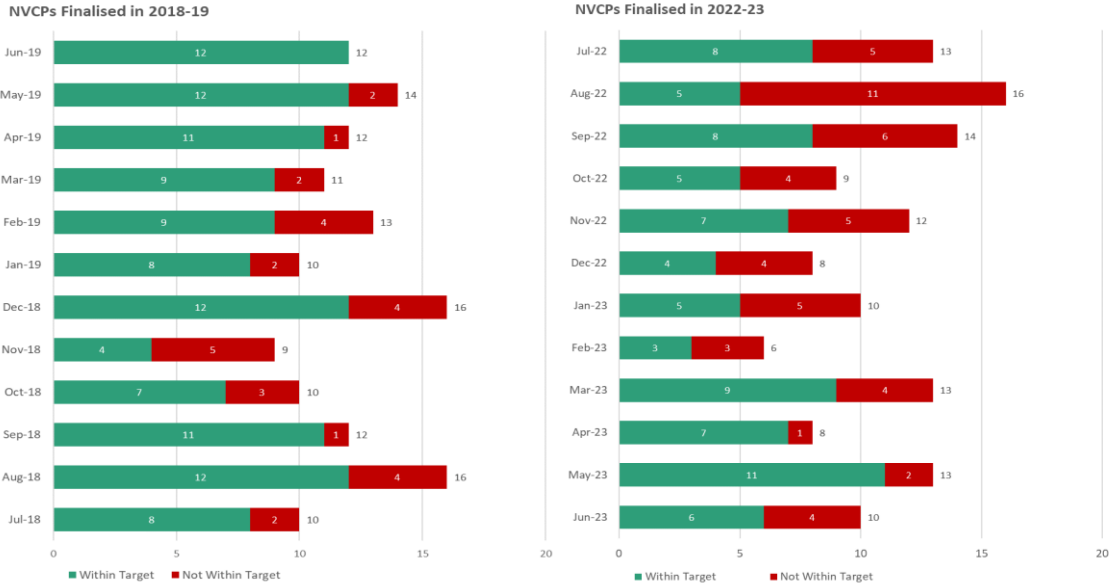
Figure 10 – NVCPs finalised in 2018-19 and 2022-23



Of the NVCPs finalised in 2022-23, 59.1 per cent were finalised within the target timeframe of 60 calendar days with applications taking an average of 81 calendar days to be processed by DEMIRS. Whilst this is below DEMIRS' target to complete 80 per cent of all applications within

the target timeframe, it is an improvement on 2021-22 where only 40 per cent of NVCP applications were finalised within 60 calendar days with DEMIRS taking an average of 108 days for processing. However, this is also a substantial drop from 2018-19 where 79.3 per cent of NVCPs were finalised within the target with an average processing time of just 58 calendar days.

Figures 11 and 12 – NVCPs finalised within the target in 2018-19 and 2022-23



5. 2022-23 MINING ENVIRONMENTAL APPROVALS ANALYSIS - ‘STOP THE CLOCK’ EVENTS

When events occur outside of the direct control of DEMIRS, the ‘clock is stopped’ and the processing time is put on hold. That is, the time taken for these events, which are processes outside of DEMIRS, to be completed is not counted in the department’s processing time for assessment against the target timeframes.

‘Stop the clock’ (or on-hold) events include, but are not limited to:

- requesting further information from the proponent;
- referring applications to other agencies for advice in accordance with administrative agreements or legislative obligations; and/or
- awaiting grant of tenure.

An application may experience none, one or multiple of these events, depending on the nature of the application. For further information see DEMIRS’ [Environmental Applications Administrative Procedures](#).

5.1. PoW

PoWs may be subject to any of the on-hold events as outlined in Table 4. The most common of these in 2022-23 were requesting information from the proponent with 1,237 (39.61 per cent) of the finalised applications subject to this event. On average, this event would take 15 business days to be finalised. Applications awaiting advice from DWER – Environmental Protection Agency (EPA) typically have the longest event of 47 business days, however, only 16 applications (0.51 per cent) were subject to this event.

Table 4 – 2022-23 timeframes for POW on-hold workflow events

Workflow event	Percentage of applications subject to workflow event (%)	Average business days for event
Information requested from proponent	39.6%	15
Awaited excess tonnage approval	10.2%	23
Referred to DBCA	5.5%	24
Referred to DWER – Water	3.8%	20
Referred to DWER – EPA	0.5%	47
Referred to other agency	0.1%	12

5.2. MPs

MPs may be subject to any of the on-hold events as outlined in Table 5. The most common of these was requesting information from the proponent with 197 (81.4 per cent) of the finalised applications being subject to this event. On average, this event would take 43 business days to complete. Similar to PoWs, MP applications awaiting advice from DWER - EPA would typically have the longest time delay of an average 77 business days with 12 (5 per cent) applications being subject to this event.

Table 5 – 2022-23 timeframes for MP on-hold workflow events

Workflow event	Percentage of applications subject to workflow event (%)	Average calendar days for event
Information Requested from Proponent	81.4%	43
Referred to DWER - Water	7.45	35
Referred to DBCA	5.8%	31
Referred to DWER - EPA	5.0%	77
Referred to Other Agency	3.3%	28
Referred to DPLH	0.8%	56

These events can cause significant time delays to the progression of mining environmental approvals, and with the exception of awaiting grant of a tenement, relate to further information required to inform the assessment of the application.

5.3. NVCP

NVCPs may be subject to any of the on-hold events as outlined in Table 6. The most common of these was requesting further information from the proponent at the application stage of the approval process. 81 applications (60 per cent) were subject to this event, with the event taking an average of 14 calendar days to be completed. Typically, EPA referrals would be subject to the longest time delay of an average 591 calendar days, however, with only two applications (1 per cent) being subject to this event, this number is highly skewed.

Table 6 – 2022-23 timeframes for NVCP on-hold workflow events

Workflow event	Percentage of applications subject to workflow event (%)	Average calendar days for event
Assessment Stage – Information requested from the proponent	36%	94
Application Stage – Information requested from the proponent	60%	14
NOI Sent	33%	10
EPA Referral	1%	591
Pending Tenure	1%	15

6. 10 YEAR TRENDS ON END-TO-END TIMEFRAMES

DEMIRS has analysed the average end-to-end timeframes, which is a measure of how many business days (calendar days for NVCP's) have passed from the date an application was received to the date it was finalised. It is inclusive of both DEMIRS' processing time and all 'stop the clock' events.

6.1. PoWs

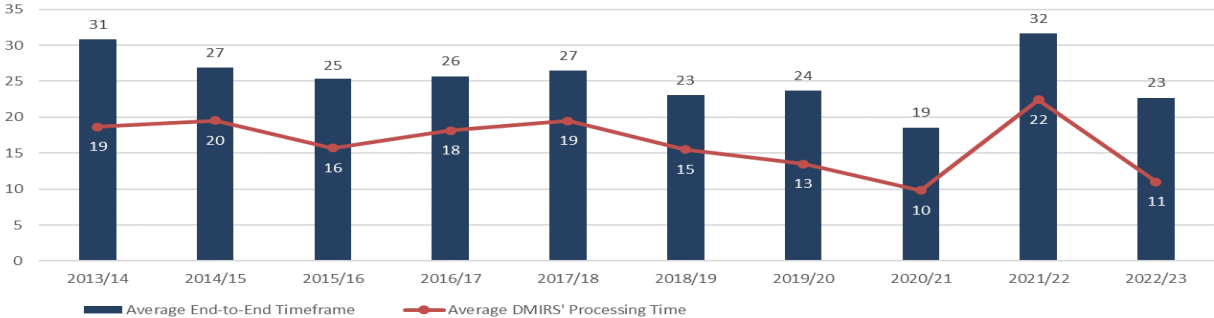
Prior to 2021-22, the average timeframe for PoW finalisation was steadily declining, particularly from 2017-18 onwards when the PoW-Spatial lodgement system was launched. DEMIRS attributes this to the significant reduction in the need to seek further information from the proponent and other agencies during the assessment process as the new system enables proponents to map out their activities and answer auto-generated questions that are tailored to their proposals.

As mentioned above, in 2021-22 DMIRS experienced a significant increase in the number of PoWs received coupled with a period of resourcing constraint, which created a backlog and put considerable pressure on approval timeframes. End-to-end timeframes increased by 70.4 per cent from 18.6 days to 31.7 days and pushed DEMIRS processing times up 129.6 per cent for an average of 22.5 business days.

In 2022-23 DMIRS was able to bring PoW timeframes back on track with significant decreases in both the end-to-end timeframe and DEMIRS' processing timeframe. The average total end-to-end timeframe decreased by 11 days to 23 business days (-28.4 per cent) while DEMIRS' average processing times decreased by 11.5 days 11 business days (-51.1 per cent), bringing DEMIRS' average processing time back within the 15 business day target.

Over the past 10 years, DEMIRS' processing time has, on average, accounted for 63.6 per cent of the total processing time. The five-year average sits slightly lower at 59.3 per cent of the total assessment timeframe, despite 2021-22 accounting for the second highest average timeframes. This highlights that 2021-22 was an anomaly and not representative of DEMIRS' typical performance.

Figure 13 – Average end-to-end and DEMIRS’ timeframe for PoWs finalised from 2013-14 to 2022-23



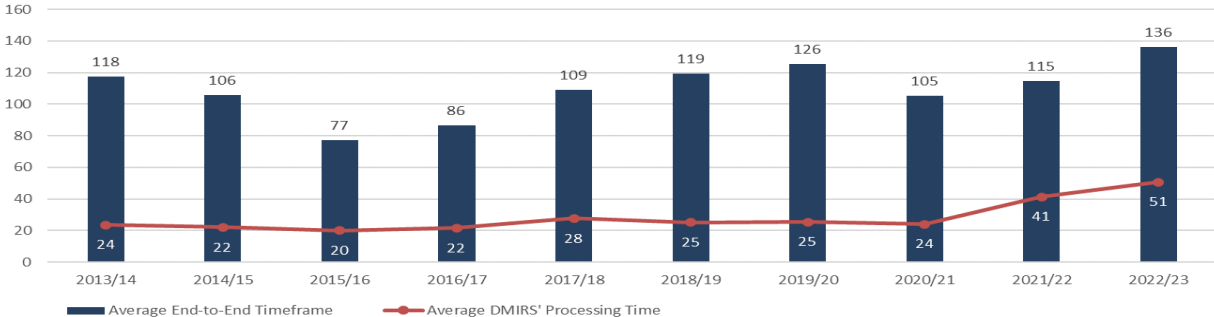
6.2. MPs

Historically, the total end-to-end timeframe for MP applications has been significantly higher than DEMIRS’ processing time due to the nature and complexity of the applications which, as outlined above, causes them to be subject to longer on-hold events than that of PoWs.

Unlike PoWs, which saw DEMIRS’ average processing time fall back below the target of 15 business days, the average processing time for MPs continued to increase to an average of 51 business days. DEMIRS aims for this number to fall over the coming financial year as DEMIRS looks to bring MP assessment timeframes back on track.

Over the past 10 years, DEMIRS’ processing time has, on average, accounted for 25.0 per cent of the total end-to-end timeframe. The five-year average sits slightly higher at 27.5 per cent of total end-to-end timeframes.

Figure 14 – Average end-to-end and DEMIRS’ timeframe for MPs finalised from 2013-14 to 2022-23

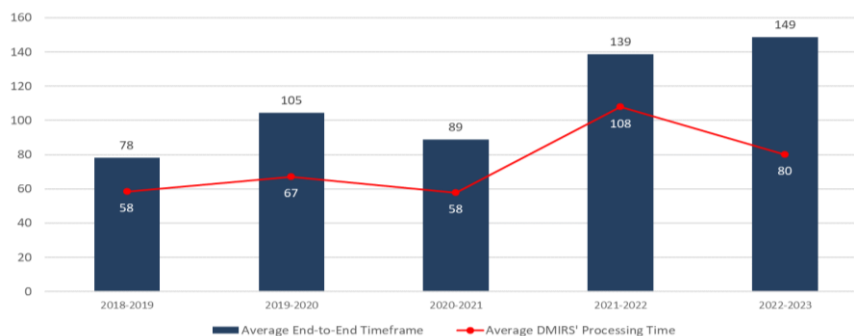


6.3. NVCP

Over the past five years¹, average end-to-end timeframes for the finalisation of NVCPs has continuously increased to reach a high of 149 calendar days in 2022-23. This is an increase of 10 days on the 2021-22 financial year. Over the past three financial years, DMIRS’ processing time has accounted for roughly 65.6 per cent of the total processing time. Despite the increase in processing timeframes, this is a slight decrease from the five-year average where 67.1 per cent of the total time is spent being processed by DEMIRS.

¹ Due to a lack of data, a period of five financial years has been used for NVCPs.

Figure 15 – Average calendar days to finalise: Received date to finalised date



7. 2022-23 POLICY AND REGULATION REFORM

DEMIRS recognises the factors that are impacting approval timeframes and is subsequently pursuing a number of reforms which will directly and indirectly ease pressure on the approval process and improve processing timeframes for industry.

7.1. Mining Amendment Act 2022

On September 21, 2022 the *Mining Amendment Act 2022* (formally the Mining Amendment Bill 2021) (Amendment Act) was passed through Parliament. The new laws will amend the *Mining Act 1978* and seek simplify the activity approval processes for the mining sector.

The changes, which will deliver a number of benefits in reducing timeframes, are summarised below.

a. Mining Development and Closure Proposal (MDCP)

One of the key features of the Amendment Act is the introduction of the MDCP framework. Under this framework, a MDCP will replace the existing requirement for submission of a MP inclusive of a MCP at the project approval stage, meaning only a single document will be required to seek approval for mining operations.

A MDCP will be a single application document that only captures information required for assessment of a proposed mining operation. MDCPs will streamline information requirements and reduce administrative burden by removing duplicate sections that currently exist across MPs and MCPs, and tailor the information requirements of the MDCP so it is a fit for purpose approval document. It is expected that this will assist in streamlining the assessment of mining approvals as DMIRS will only consider and assess one document at the project approval stage. DMIRS will also continue to work with other agencies to ensure any duplication with other regulatory frameworks is reduced.

In addition, though the specific content requirements of a MDCP is currently under development and will be subject to further stakeholder consultation, it is intended for MDCPs to include a number of standardised elements (I.E. risk assessment framework, environmental and closure outcomes), which will assist with the streamlining of assessment timeframes of mining assessments.

It is also expected that the introduction of the MDCP framework will reduce the frequency of further information requests and on-hold events for mining assessments. This is due to there being only a single targeted approval document (MDCP) required at the application

stage, which removes the duplication that currently exists between MPs and MCPs (currently required at application stage), reducing the volume of information to assess and subsequently reducing further information requests.

b. Eligible Mining Activities (EMA)

The volume of applications received is the key factor affecting length of assessment timeframes for PoWs. The *Mining Amendment Act 2022* introduces an EMA approval which is anticipated to alleviate the pressure sustained from receiving volumes of PoW applications. An EMA will be an alternative pathway of authorisation for certain eligible activities that would otherwise require assessment via a PoW. The new amendments will allow the authorisation of certain eligible mining activities to be automated and will remove these activities from the assessment queue.

From analyses it is anticipated that up to 30 per cent of PoW applications submitted in 2022-23 could potentially have been eligible under the EMA framework. A 30 per cent decline would be a significant reduction of the assessment queue and, due to greater availability of assessment capacity, would correlate to a notable reduction in assessment timeframes.

DEMIRS is currently in the process of developing regulations and systems that will support the legislative amendments to introduce MDCPs and EMAs with an anticipated release date in September 2024.

7.2. Programme of Work Guidance

To reduce the frequency of on-hold workflow events due to 'information requested from proponent', DEMIRS has developed a Programme of Work Guidance document to support applicants preparing PoW applications. The intent of this guidance is to provide transparency on the information requirements of PoW applications, in order to reduce the instances of PoWs submitted which do not address all requirements. This guidance was released for stakeholder consultation in December 2022 and will soon be available on the department's website.

8. FAST TRACKING MINING APPROVALS STRATEGY

Aligning with the Western Australian digital strategy, the REC Division within DEMIRS has developed a Fast Tracking Mining Approvals (FTMA) strategy to support exploration and development activities and to meet the changing demand from the resource industry. One of the key components to the strategy is a digital transformation which will modernise and integrate systems and expand on spatial capability.

8.1. Digital Transformation

The FTMA digital program (the program) has been established to significantly expand and improve the digital and spatial capability of all mining and petroleum environmental lodgement to DEMIRS and to support fast track multiple assessment timeframes. Key lodgements (for assessment) within this program include PoWs, MPs and MCPs. The program is expected to deliver a number of benefits including improved assessment timeframe and efficiency, customer experience, data collection and business intelligence.

Resources Online will simplify the approval process by providing live guidance at the time of lodgement to ensure applications contain all required information and the time of submissions,

thereby reducing requests for information during the assessment stage. In addition, planned system integration between DEMIRS and DWER via Resources Online and Environment Online will greatly improve parallel processing between agencies and enabling for easier data sharing when referring an application to external agencies for advice.

Resources Online will also improve the transparency of the assessment process by allowing applicants to track their applications from submission to decision. It is expected this will assist with approval timeframes by reallocating officers' time from administrative queries relating to the stage of the application, to assessment work.

Further, open and consistent communication is critical to the success of the program and change management. Regular status updates will be provided to key stakeholders and industry representations. Regular engagement sessions will be held with an industry working group to ensure key stakeholders and potential end users are aware and prepared for the changes post implementation. The industry working group will be formed via an invitation early 2024.