

Infrastructure 15, Association for Consultancy and Engineering

Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change,
Environment, and Infrastructure Committee**

Bil Seilwaith (Cymru) | Infrastructure (Wales) Bill

Ymateb gan ACE Cymru | Evidence from Association for Consultancy and
Engineering Wales

INFRASTRUCTURE (WALES) BILL

ACE Wales Submission



ABOUT ACE

The Association for Consultancy and Engineering (ACE) is the association for the UK's professional consultancies and engineering companies operating in the social and economic infrastructure sectors.

The ACE champions infrastructure and the built environment to government and other stakeholders, representing the views of around 400 members. Our members employ over 60,000 in the UK and 250,000 worldwide, contributing more than £15 billion to the UK economy. However, the buildings they create actively contribute over £570 billion a year of GVA.

Our **vision** is for a safe, innovative, resilient, and globally competitive UK built environment sector driving economic growth by delivering well-connected, socially valuable and environmentally sustainable places. Our **mission** is to advocate, anticipate, and educate on behalf of our members. That means proactively engaging with government and stakeholders about challenges and opportunities, ensuring members of all sizes have a voice.

ACE SUBMISSION

The provisions set out in the Welsh Government's Infrastructure (Wales) Bill have the aim of reforming the law governing the development of significant infrastructure projects. The Bill outlines various categories of significant infrastructure projects and sets out the criteria for each category. Below are some perspectives on the provisions, following consultation with our members at the Association for Consultancy and Engineering (ACE)

What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

2.i) Part 1 - Significant infrastructure projects

Clarity and Scope:

The Bill aims to provide a clearer definition of "significant infrastructure projects" and identifies key sectors such as energy, transport, water, waste, and more. This clarity will help ACE members understand the scope of the projects and the relevant regulations that may apply. The Bill outlines specific criteria for different types of infrastructure projects, such as power generation, railways, airports, and waste facilities. This will provide a framework for evaluating the potential impacts of these projects on the environment, communities, and infrastructure networks.

The Bill presents an opportunity to achieve a more comprehensive and interconnected approach to infrastructure development by considering regional needs and fostering efficiency in resource allocation. While the Bill outlines specific provisions for individual sectors, it is essential to recognise that these sectors are interconnected, often sharing resources, dependencies, and environmental impacts. ACE members, well-versed in diverse sectors, are uniquely positioned to contribute to this holistic perspective.

Complexity of Assessments:

Depending on the category, certain infrastructure projects may require in-depth assessments and feasibility studies due to their scale and potential environmental impact. ACE members may need to conduct detailed environmental impact assessments (EIAs) and engineering feasibility studies to ensure compliance with the regulations.

Cross-Border Projects:

The Bill recognises the possibility of cross-border projects, where developments span both Wales and neighbouring regions. This may lead to coordination challenges and require ACE members to work with multiple authorities to secure necessary approvals and comply with regulations from different jurisdictions.

The Bill should not only acknowledge the potential for cross-border projects, but also underscore the need for alignment of behaviours and collaborative efforts in addressing the unique challenges that arise from developments spanning multiple jurisdictions. Communities situated on the border between Wales and neighbouring regions often experience varying policies and regulatory frameworks, which can create disparities in infrastructure development and service delivery. ACE members have a pivotal role in navigating these complexities.

One of the significant challenges faced by communities on the border is the divergent application of policies and regulations across jurisdictions. This can lead to uneven access to infrastructure and services, impacting the well-being of residents. The Bill provides an opportunity to drive some alignment and consistency in policy application, ensuring that communities on both sides of the border benefit equitably from infrastructure developments. ACE members, through their expertise, can advocate for streamlined processes and advocate for policies that bridge these disparities.

Cross-border projects require effective collaboration between authorities from different regions. The Bill encourages engagement and cooperation among relevant bodies, fostering a shared approach to infrastructure planning and decision-making. ACE members can facilitate this collaboration by acting as intermediaries, leveraging their expertise to align technical standards, environmental assessments, and project timelines. This collaborative effort enhances efficiency, minimises duplication of efforts, and delivers cohesive outcomes.

ACE members, working closely with communities, can play a vital role in advocating for the interests of border regions. By engaging with local stakeholders, they can gather insights into the specific needs and concerns of these communities. This information can be channelled into discussions with regulatory authorities to influence policy decisions and ensure that cross-border projects are tailored to address the unique challenges faced by border communities.

Inconsistent regulatory processes across borders can lead to delays and complications for cross-border projects. ACE members can leverage their technical expertise to propose streamlined approval mechanisms that are acceptable to multiple jurisdictions. This approach minimizes bureaucratic hurdles and ensures that projects progress smoothly, benefitting communities on both sides of the border.

A harmonised approach to cross-border infrastructure can be facilitated through knowledge sharing and capacity building. ACE members can serve as conduits for sharing best practices, innovative solutions, and successful case studies from various regions. This exchange of knowledge empowers authorities to adopt effective strategies and align behaviours, fostering a culture of collaboration and consistency in cross-border project implementation.

Consideration of Technological Advances:

As the Bill provides criteria based on capacities and volumes, it may need to be flexible enough to accommodate future technological advancements that could impact project scale or efficiencies.

Consultation and Community Engagement:

The provisions could require ACE members to actively engage with local communities and stakeholders during the planning and development stages. Many already do this, and see public consultations and community involvement as essential for understanding concerns and ensuring that projects align with community needs.

2.ii) Part 2 - Requirement for infrastructure consent

Requirement for Infrastructure Consent (Section 19):

This provision could add an additional layer of bureaucracy and time-consuming processes for ACE members working on significant infrastructure projects. It may require more effort and coordination to obtain the necessary approvals, potentially delaying project timelines.

The successful implementation of Infrastructure Consent processes requires adequate funding for the consenting body, which may Natural Resources Wales (NRW), and Local Authorities. A crucial aspect of streamlining existing processes is ensuring that the additional responsibilities imposed by the Bill are supported by sufficient financial resources. The effectiveness of the consent process heavily relies on the capacity of these authorities to carry out their tasks efficiently, without being hampered by funding constraints. Consulting engineers need to be aware of the funding mechanisms in place and advocate for adequate financial support to enable timely and effective decision-making.

One of the potential challenges is streamlining the existing consenting processes across various authorities. At present, the consenting landscape is dispersed among different bodies, and introducing a unified approach might require significant coordination and restructuring. While streamlining is intended to simplify processes, it may initially lead to complexities as different authorities align their practices. Consulting engineers, being at the forefront of project execution, will need to navigate these transitional challenges, ensuring that the streamlined processes do not inadvertently result in bottlenecks or confusion.

Effect of Requirement for Infrastructure Consent (Section 20):

The introduction of the requirement carries both potential benefits and transitional challenges for ACE members. While the aim is to streamline the regulatory landscape, it is important to recognise that this provision interacts with a broader framework that includes funding considerations and the reorganization of existing consenting processes.

On the positive side, the provision has the potential to simplify the regulatory process for significant infrastructure projects. By consolidating various approvals under a single framework, it offers a streamlined path towards obtaining necessary consents. This can reduce the administrative burden and complexities that ACE members often encounter when navigating multiple regulatory channels. However, this positive outcome is contingent upon effective implementation and cooperation among relevant authorities.

While the provision aims to simplify processes, it does introduce a new layer of compliance that ACE members need to navigate. They will need to familiarise themselves with the infrastructure consent process, criteria, and documentation requirements. This entails a learning curve as engineers adapt to the new framework to ensure that their projects comply with the established standards.

It's important to note that the success of the streamlined consent process, as envisioned by the Bill, depends on factors beyond planning and regulatory aspects. The effectiveness of the new framework hinges on the availability of adequate funding for the consenting bodies, as well as the reorganisation and alignment of existing consenting processes. The Bill primarily addresses planning considerations, and the implementation of funding mechanisms and reorganisation plans will play a pivotal role in ensuring a seamless and efficient transition.

Powers to change the requirement or its effect (Section 21):

The inclusion of powers to modify the types of consent through regulations, as outlined in Section 21 of the Bill, introduces an element of adaptability to the regulatory landscape. While this provision offers the

potential for flexibility, it also presents certain considerations and challenges for ACE members, particularly in the context of Wales' infrastructure development scale.

The ability to modify the types of consent through regulations reflects a recognition of the dynamic nature of infrastructure development. As Wales evolves and undertakes various projects, the specific requirements for obtaining consent may need to be adjusted to align with changing circumstances, technological advancements, and environmental considerations. This adaptability allows the regulatory framework to remain relevant and effective over time. One pertinent consideration in the context of Wales is the scale of infrastructure change and the magnitude of projects that may trigger the implementation of regulatory requirements. While larger infrastructure projects might be more affected by the evolving consent requirements, the question of scale arises: Is Wales poised to undertake a sufficient number of large-scale projects where the potential cost and time investments in navigating regulatory changes would be substantial?

Directions specifying development as a significant infrastructure project (Section 22):

The designation of a development as a significant infrastructure project goes beyond mere scale. It takes into account the potential transformative effects that a project could have on the economic, social, and environmental landscape of Wales. A prime example of this could be the establishment of new nuclear facilities at locations like Trawsfynydd and Wylfa. These projects, while undoubtedly significant in scale, also carry the potential for long-lasting benefits, including job creation, community development, and energy security.

The provision acknowledges that a project's significance can be measured by its positive impact on local communities and the broader economy. ACE members working on projects recognise that their efforts not only contribute to the technical aspects but also play a role in shaping the future prosperity of Wales and the well-being of its residents.

For ACE members, predicting whether their projects will be designated as significant infrastructure projects could pose a challenge. This uncertainty may influence project planning, budgeting, and resource allocation. Early and proactive engagement with the Welsh Ministers becomes paramount. By initiating discussions, seeking clarification, and understanding the criteria for significance, consulting engineers can mitigate uncertainty and ensure that their projects align with the objectives of the Welsh government.

Directions for applications to be treated as applications for infrastructure consent (Section 23):

This provision could lead to changes in the approval process mid-project, potentially affecting project timelines and requiring additional documentation or information.

Directions specifying that development is not a significant infrastructure project (Section 24):

If a project is not designated as a significant infrastructure project, it could streamline the approval process. However, there could be a risk of projects being wrongly categorised, leading to compliance issues later on.

In conclusion, the Infrastructure (Wales) Bill's provisions have the potential to simplify the regulatory landscape by consolidating approvals under infrastructure consent. However, they may also introduce uncertainties and potential delays for ACE members working on significant infrastructure projects. To ensure workability and delivery of the stated policy intentions, it will be essential for ACE members to closely monitor any changes to regulations, engage with the relevant authorities early in the project lifecycle, and be prepared to adapt to new requirements as they arise.

2.iii) Part 3 - Applying for infrastructure consent.

Assistance for Applicants (Sections 27 and 28):

Promoters and applicants should recognise that seeking pre-application advice may entail additional costs and time. While these investments can yield significant benefits by streamlining the later stages of the process, it's essential to be prepared for the financial and temporal implications of seeking and incorporating pre-application advice into their project planning.

For pre-application services to be effective, it's crucial that the bodies responsible for reviewing and providing advice have the necessary expertise, resources, and decision-making authority. By engaging with pre-application advice, ACE members can identify potential challenges and constraints at an early stage. This allows for proactive problem-solving and the development of strategies to mitigate issues that could otherwise arise during the formal application process. Early identification and resolution of challenges can save time, costs, and potential delays.

Sections 27 and 28 encourage engagement with stakeholders, including those with an interest in the land subject to the application. ACE members can leverage pre-application advice to proactively address concerns, incorporate feedback, and foster positive relationships with stakeholders. This approach not only contributes to smoother regulatory approvals but also enhances community acceptance.

To make the most of pre-application services, effective communication between applicants, regulatory bodies, and other relevant stakeholders is key to ensuring that the advice provided is tailored, accurate, and aligned with the project's objectives.

Pre-application Procedure (Sections 29 to 31):

For ACE members, this pre-application procedure will require proactive engagement with local planning authorities and community councils. Publicising the proposed application will help in soliciting feedback and addressing concerns early in the process.

Application Procedure (Sections 31 to 34):

ACE members will need to ensure that their applications are complete and comply with the specified requirements. The pre-application consultation report will require accurate and comprehensive information to demonstrate the consideration of stakeholders' inputs.

Local Impact Reports and Marine Impact Reports (Sections 35 and 36):

ACE members may need to provide relevant information to planning authorities, community councils, and Natural Resources Wales to assist in preparing accurate impact reports. This will involve assessing the likely impact of the proposed development on the area and the marine environment, respectively.

Consultation on Compulsory Acquisition (Sections 37 and 38):

ACE members involved in projects with compulsory acquisition requests will need to adhere to regulations and actively consult with affected parties to address their concerns.

In summary, Part 3 of the Infrastructure (Wales) Bill introduces a structured pre-application and application process, requiring thorough consultation and impact assessment. For ACE members, this means engaging early with stakeholders, providing accurate and detailed information, and adhering to regulations for successful applications and obtaining infrastructure consent.

2.iv) Part 4 - Examining applications.

The provisions outlined in Part 4 of the Infrastructure (Wales) Bill deal with the process of examining applications for infrastructure consent in Wales. These provisions are essential to ensure that infrastructure projects are adequately assessed and meet the required standards before they are approved.

Appointing an Examining Authority (Section 39):

ACE members may need to work closely with the appointed examining authority during the application process. They should be prepared to provide all necessary technical documentation and information to the examining authority to facilitate a thorough examination of the application.

Determining Examination Procedure (Section 41):

ACE members may need to be involved in the process of determining the examination procedure for each application. They should be prepared to participate in local inquiries, hearings, or provide written representations based on the examining authority's decision. ACE members must also be familiar with the procedures outlined in the regulations for examining applications. They should ensure that they comply with the specified time limits for submitting representations and supporting documents, as failure to do so may impact the examination process.

Reports and Recommendations (Section 49):

ACE members should be aware that the examining authority will prepare a report with findings, conclusions, and recommendations on the application. They must ensure that all technical reports and assessments submitted are thorough and accurate, as these will form the basis of the examining authority's report.

Overall, the provisions outlined in Part 4 of the Infrastructure (Wales) Bill seem to be workable and aligned with the stated policy intentions. They establish a clear process for examining infrastructure consent applications, promote transparency and public involvement, and ensure that decisions are based on thorough assessments. However, successful implementation will also depend on the effectiveness of regulations and guidelines, as well as ensuring proper resources and expertise are available for the examining authorities. ACE members can play a crucial role in supporting these processes, providing technical expertise and objective assessments of the proposed infrastructure projects.

2.v) Part 5 - Deciding applications for infrastructure consent.

For ACE members, the provisions outlined in Part 5 of the Infrastructure (Wales) Bill deal with the decision-making process for applications seeking infrastructure consent. These provisions are crucial for ensuring that applications are decided upon in accordance with statutory policies, relevant considerations, and within specified timeframes.

Decision Maker (Section 52):

ACE members may need to be prepared to work closely with either the examining authority or the Welsh Ministers, depending on who is designated as the decision-maker for a particular application. It is essential to understand the roles and responsibilities of each decision-maker and align their technical assessments and recommendations accordingly.

Duty to Decide in Accordance with Statutory Policies (Section 53):

ACE members will need to be well-versed with the relevant infrastructure policy statements, the National Development Framework for Wales, and marine plans (where applicable). Our members will need to

ensure that their proposals and recommendations align with these policies to enhance the chances of successful application outcomes.

Matters to Have Regard to (Section 54):

ACE members will need to provide comprehensive and well-documented local impact reports and marine impact reports, where relevant. Their input and expertise will be critical in informing the decision-making process, and they need to ensure that all relevant material considerations are taken into account during application examination.

Disregarding Matters (Section 55):

ACE members will need to be aware of any matters specified in regulations that decision-makers may disregard. They need to focus on presenting information and recommendations that are considered essential by the examining authority or Welsh Ministers, as specified in the regulations.

Timetable for Deciding Applications (Section 56):

ACE members will need to be mindful of the strict timelines for decision-making. They will need to provide necessary technical data, reports, and documentation promptly to avoid delays in the process. Additionally, they may be involved in providing expert advice if an extension is sought by the applicant or the Ministers.

Associated Development (Section 58):

ACE members may be involved in assessing and providing technical support for associated developments. They must ensure that these developments are well-integrated with the main project and meet the necessary infrastructure requirements.

Overall, the provisions in Part 5 of the Infrastructure (Wales) Bill seem to be workable and aligned with the stated policy intentions. They establish clear procedures for decision-making, consider relevant policies and reports, and ensure timely and accountable outcomes. ACE members can play a vital role in assisting the examining authority or Welsh Ministers with technical assessments and recommendations during the decision-making process.

3. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

From the perspective of ACE members, there may be several potential barriers to the implementation of the Infrastructure (Wales) Bill's provisions. These barriers could impact ACE members' ability to effectively navigate the application process and deliver on the policy intentions of the Bill.

Complexity of Regulations (All Sections):

The regulations governing the examination process, appointment of examining authorities, and decision-making may be complex and subject to frequent changes, making it challenging for consulting engineers to keep up with the latest requirements. The Bill aims to provide clarity by setting out the general framework for the examination process and the criteria for decision-making. However, the specific regulations to be established by the Welsh Ministers will be crucial in providing detailed guidance to ACE members and other stakeholders.

Time Constraints (Sections 56 and 57):

The strict timetable for deciding applications within 52 weeks may create pressure on consulting engineers to submit comprehensive technical reports and assessments within tight deadlines. The Bill allows for the Welsh Ministers to extend the decision-making period through a direction. This flexibility acknowledges that certain applications may require more time for examination due to their complexity. However, ACE members will need to be proactive in managing their time and resources efficiently to meet the prescribed deadlines.

ACE members often rely on seasonally sensitive data for various technical assessments. Ecological or environmental surveys, traffic studies, and other data collection efforts may be subject to specific timeframes dictated by natural or environmental conditions.

The strict timetable for deciding applications within 52 weeks may create pressure on ACE members to collect, analyse, and present data within limited timeframes. Seasonal constraints can exacerbate this challenge, potentially leading to difficulties in obtaining the necessary data to support applications. Failure to secure critical data within the prescribed timeframe may impact the quality of technical reports and assessments. These factors can add 6 months or more to projects.

The interplay between time constraints and seasonality of data collection can introduce delays that affect project timelines. In some cases, the inability to gather essential data within the required timeframe may necessitate waiting for the next suitable season, which can add several months to the project duration. These delays can have cascading effects on project planning, approvals, and construction.

The Bill's provisions for extending decision-making periods acknowledge the reality of complex and seasonally influenced applications. ACE members may leverage this flexibility by engaging with the Welsh Ministers and other relevant authorities early in the process. By clearly communicating the potential impact of data seasonality on project timelines, ACE members can seek informed decisions on extensions, helping to manage expectations and mitigate delays.

Incompatibility of Policies (Section 53):

In cases where the infrastructure policy statement, the National Development Framework, and marine plans contain conflicting provisions, it may be challenging for ACE members to ensure their applications align with all the relevant policies. The Bill recognises that there could be conflicts between different policies and provides a hierarchy for decision-making. The duty is to decide in accordance with the relevant policy statement, but the Welsh Ministers may disregard this duty under certain circumstances. This allows for flexibility in decision-making while ensuring compliance with broader policy objectives.

To address conflicts, the Bill introduces a hierarchy for decision-making. The primary duty is to decide in accordance with the relevant infrastructure policy statement. However, the Welsh Ministers have the authority to disregard this duty under specific circumstances. This approach allows for a level of flexibility, where the Welsh Ministers can make decisions that deviate from the policy statement if certain conditions are met.

The provision's aim is to strike a balance between adhering to policy objectives while accommodating exceptional circumstances. It recognises that strict adherence to conflicting policies may not always lead to desirable outcomes and allows for deviations when justified. This mechanism enables the Welsh Ministers to consider broader factors and potential implications when making decisions.

For ACE members, the challenge lies in navigating the nuances of conflicting policies and understanding when the Welsh Ministers may choose to disregard the duty to decide in accordance with the infrastructure policy statement. It underscores the importance of clear communication between ACE members and regulatory authorities to ensure alignment and avoid potential conflicts that could delay project timelines.

Public Participation (All Sections):

Public inquiries and hearings require active engagement with stakeholders, which can be time-consuming and may lead to opposition or delays in the process. The Bill emphasises public engagement by providing opportunities for local inquiries, hearings, and written representations. ACE members will need to be prepared to present technical information in a clear and accessible manner to facilitate public understanding and engagement with the proposed developments.

Expertise and Resources (All Sections):

The examination process may require specialised expertise and resources, and some ACE members, especially smaller ones, may face challenges in meeting these requirements. The Bill allows for the appointment of assessors and legal representatives to support the examining authority, providing an opportunity for ACE members with specific expertise to contribute to the process. However, the Bill does not explicitly address potential resource constraints faced by ACE members. Resource limitations could hinder the ability of ACE members to conduct comprehensive assessments, prepare technical reports, and engage with stakeholders effectively. They may struggle to compete with larger firms that have more extensive resources.

Interdisciplinary Collaboration:

Infrastructure projects often require collaboration among various disciplines, such as environmental, civil, and structural engineering. Coordinating and integrating inputs from different experts may be challenging, especially if there are conflicting recommendations or priorities. ACE members will need to facilitate effective communication and collaboration among different disciplines involved in the examination process. Ensuring a coherent and unified approach to address technical challenges and provide well-rounded solutions is essential.

Evolving Regulations and Policies:

The examination process is subject to regulations and policies that may change over time. Keeping track of the latest updates and ensuring compliance with the evolving requirements can be demanding. ACE members will need to stay updated with the latest regulations and policy changes to ensure their applications are in line with current standards. This requires continuous professional development and active engagement with relevant authorities.

Balancing Development Objectives with Environmental Concerns:

Infrastructure projects often involve striking a balance between meeting development objectives and addressing environmental and social impacts. ACE members may face challenges in finding sustainable solutions that align with policy objectives, and clients in particular will need to be prepared to be flexible as these solutions are provided. ACE members play a vital role in incorporating sustainable practices and environmental considerations into their designs and proposals. They must collaborate with other stakeholders to address environmental concerns effectively.

In conclusion, consulting engineers face a range of challenges during the implementation of the Infrastructure (Wales) Bill. These challenges include resource constraints, interdisciplinary collaboration, public opposition, evolving regulations, expert assessments, and balancing development objectives with environmental concerns. To address these challenges, consulting engineers should focus on effective resource management, enhancing interdisciplinary collaboration, engaging with stakeholders transparently, staying updated with regulations, and promoting sustainable practices in their work. Adapting to these challenges will enable ACE members to contribute effectively to the examination process and support the successful implementation of infrastructure projects in Wales.

5. Are any unintended consequences likely to arise from the Bill?

There are several potential unintended consequences that may arise from the Infrastructure (Wales) Bill. These unintended consequences could impact the efficiency, effectiveness, and overall success of the infrastructure development process.

Delayed Decision-Making:

The Bill sets specific timelines for deciding infrastructure consent applications. However, if the examination process becomes overly complex or subject to delays, it may lead to longer decision-making periods. This can result in project delays, uncertainty for investors, and increased costs.

Overburdened Consulting Engineers:

The examination process, with its rigorous technical assessments and detailed reporting requirements, may place a significant burden on consulting engineers. If the workload becomes overwhelming, it can affect the quality of assessments and reports, potentially leading to inaccuracies or omissions.

Inconsistent Interpretation:

The Bill's provisions involve various regulations, criteria, and policies that ACE members must consider when preparing applications. Different interpreting of these provisions by different authorities or examiners may lead to inconsistent decisions on similar projects, causing confusion and uncertainty for developers.

Reduced Innovation:

While the Bill emphasises adherence to predefined policies and regulations, it should also recognise the importance of fostering innovation. ACE members often bring forward novel and sustainable approaches to infrastructure projects that can enhance efficiency, minimise environmental impact, and improve community outcomes. The Bill could benefit from provisions that encourage the exploration and integration of innovative solutions within the framework of regulatory compliance.

The challenge lies in striking a balance between adhering to established policies and allowing room for creative problem-solving. ACE members should have the flexibility to propose innovative measures that meet or exceed regulatory requirements, leading to improved project outcomes and positive impacts on communities. To drive innovation, the Bill could explicitly emphasise the integration of best practices from various sectors and regions. This could involve the establishment of guidelines or resources that showcase successful approaches from similar projects. By leveraging collective knowledge and experiences, ACE members can adopt proven strategies and adapt them to the unique context of their projects.

The Bill could also encourage the creation of collaborative platforms where ACE members, regulatory bodies, experts, and other stakeholders can exchange ideas, share experiences, and collectively address challenges. Such platforms can nurture a culture of innovation, allowing professionals to learn from one another and collectively enhance the industry's capabilities.

All regulatory frameworks should be designed with an element of flexibility and adaptability. As technology and best practices evolve, ACE members should have the freedom to incorporate these advancements into their projects without being encumbered by overly rigid regulations. The Bill could consider mechanisms for periodic review and updates to accommodate emerging trends.

Increased Cost of Compliance:

Complying with the requirements of the Bill, including comprehensive technical assessments and public inquiries, may lead to higher project costs. Smaller engineering firms may find it challenging to bear the additional financial burden, potentially reducing competition in the industry.

Limited Accessibility to SMEs:

The examination process may favour larger engineering firms with more resources and experience, making it difficult for small and medium-sized enterprises (SMEs) to compete effectively. This could reduce opportunities for SMEs to participate in significant infrastructure projects.

To mitigate these unintended consequences, policymakers and regulatory bodies should actively engage with ACE members during the Bill's implementation. They can provide valuable feedback based on their practical experiences and propose potential adjustments to improve the efficiency and effectiveness of the examination process. Additionally, promoting transparency, adopting best practices, and investing in professional development can enhance the credibility and reputation, fostering public trust and acceptance of their contributions to the infrastructure development process.

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