PAKISTAN REGULATORY MODERNISATION INITIATIVE

STRATEGY AND IMPLEMENTATION

JUNE 2021

Pakistan Regulatory Modernisation Initiative

STRATEGY & IMPLEMENTATION

Board of Investment
Govt. of Pakistan

UKaid
from the British people

WORLD BANK GROUP
THE WORLD BANK   IFC International Finance Corporation

May 2021

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Acronyms and Abbreviations

AI	Artificial Intelligence
BOI	Board of Investment
BEG	Business Expert Groups
CCI	Council of Common Interests
CNIC	Computerised National Identity Card
DB	Doing Business
EDB	Engineering Development Board
FBR	Federal Board of Revenue
FCDO	Foreign, Commonwealth & Development Office
FWG	Federal Working Group
GoP	Government of Pakistan
IFC	International Finance Corporation
KPI	Key Performance Indicators
KP	Khyber Pakhtunkhwa
MoIP	Ministry of Industries & Production
NCC	National Coordination Committee on SMEs
NRDO	National Regulatory Delivery Office
NOC	No Objection Certificate
PBP	Pakistan Business Portal
PMO	Prime Minister's Office
PMU	Project Management Unit (at BOI)
PRG	Pakistan Regulator's Guidelines
PRMI	Pakistan Regulatory Modernisation Initiative
PSW	Pakistan Single Window
PWG	Provincial Working Group
RIA	Regulatory Impact Assessment
RLCOs	Registrations, Licences, Certificates, and Other Permits
RPA	Robotic Process Automation
SECP	Securities & Exchange Commission of Pakistan
SMEDA	Small and Medium Enterprises Development Authority
SEZ	Special Economic Zones
TA	Technical Assistance
TDAP	Trade Development Authority of Pakistan
VOSS	Virtual One-Stop-Shop
WBG	World Bank Group

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ACKNOWLEDGEMENTS

MESSAGE FROM ADVISOR TO THE PRIME MINISTER ON COMMERCE AND INVESTMENT

The regulatory modernisation journey of the country began when the government started working proactively on improving Pakistan's ranking on the Doing Business Index of the World Bank. The Doing Business ranking measures the performance of the public sector in Karachi and Lahore only. However, this new initiative would address the long-standing demands of the private sector to expand regulatory reforms to the whole country.

Understanding that the private sector is the best judge of which regulatory requirements pose the greatest obstacle to efficient business functioning, this strategy document envisages extensive consultations and collaboration with the private sector. It would help identify regulatory difficulties and create practical solutions.

As the regulatory burden is an obstacle to the growth of new and existing businesses, I am confident that the Pakistan Regulatory Modernisation Initiative would ease that burden and enable private sector growth.

Abdul Razak Dawood
Advisor to the PM on Commerce and Investment
Islamabad
May 2021

MESSAGE FROM THE MINISTER OF STATE AND CHAIRMAN BOARD OF INVESTMENT

The Board of Investment has undertaken a challenge to change the private sector's regulatory space to create an environment in which businesses, investment, and trade can thrive. The Pakistan Regulatory Modernisation Initiative (PRMI) is the country's toolkit to create that thriving space. It will help the government departments and regulators learn from the global best practices for private sector development and spur cross-fertilisation of ideas across all provinces and departments.

The targeted outcome of PRMI is to have regulations that simultaneously serve the best interests of the community and the private sector. It is hoped that it will make our private sector more competitive and attractive for domestic and international investments.

I am confident that PRMI will transform Pakistan into a global destination for investment and doing business in the next few years.

Atif Riaz Bokhari
Chairman, Board of Investment
Islamabad
May 2021

FOREWORD

Business regulations in Pakistan are multi-layered, outdated, and have limited automation. This situation is highly inefficient and leads to numerous complaints from the private sector regarding time, cost, and complexity, and uncertainty of outcomes. Widespread knowledge of these problems within the domestic and international investment communities also adversely impacts Pakistan's attractiveness as an investment location.

This document illustrates our strategy and execution plan for the Pakistan Regulatory Modernisation Initiative (PRMI), a vital component of the Pakistan government's economic development policy. Implementation of this initiative by BOI is part of the broader strategy of the government aimed at improving productivity and enhancing exports, growth, and economic development. The expected outcome of the PRMI would be a much simplified and more efficient system of business regulation. An institutional structure and capability would be created to both sustain the improvements achieved and continue with the process of regulatory transformation.

The project's objective is to improve the entry and operating environment for businesses, focusing on the simplification and automation of the regulatory framework at all three government levels – federal, provincial, and local. The vital success indicator of this initiative will be the increase in the overall private sector and foreign direct investment levels without compromising the effectiveness of the various regulatory regimes.

A significant project deliverable is establishing an online platform, the Pakistan Business Portal (PBP). Businesses would be able to use it to access the regulatory requirements, submit their applications for registrations, licences, certificates, and other permits (RLCOs) electronically, and pay any fees/charges online.

The project, designed and implemented on the specific instructions of the prime minister of Pakistan, is supported by the World Bank, the International Finance Corporation (IFC), and the Foreign, Commonwealth & Development Office (FCDO). Implementation of the PRMI will be through BOI, which is part of the Prime Minister's Office. This responsibility will complement BOI's role to facilitate and generate new investment by improving Pakistan's investment climate quality.

The activities planned for PRMI will be executed through a project management unit (PMU) at the BOI and project implementation units (PIUs) within relevant agencies at the provincial level. It is also envisaged that the need for ongoing efforts at regulatory and procedural reform will result in the institutionalisation of the PRMI by establishing a permanent agency to carry on this work. Implementation will get assistance by leveraging the World Bank-funded Digital Economy Enhancement Project (DEEP) by financing the set-up costs for the Pakistan Business Portal. The IFC and FCDO will provide advisory support for PRMI implementation.

A steering committee headed by Mr Abdul Razak Dawood, Advisor to the Prime Minister on Commerce and Investment, has approved the PRMI Strategy and Implementation Plan, duly endorsed by the provincial governments.

Fareena Mazhar
Federal Secretary, Board of Investment
Islamabad
May 2021

EXECUTIVE SUMMARY

Pakistan has taken concrete steps to improve its investment climate. Efforts to attract investment are seen across sectors comprising housing and construction, information technology and IT-enabled services, petroleum exploration, automotive manufacturing, and pharmaceutical production. All these efforts show that Pakistan recognises the need to simplify the complex regulatory landscape that businesses need to navigate at the federal, provincial, and local levels. It also understands the importance of making these changes last. An unpredictable regulatory regime and lack of regulatory harmonisation among provinces have contributed to lower foreign direct investment (FDI) and private sector growth than its regional competitors. To create a lasting impact, the Government of Pakistan has launched the Pakistan Regulatory Modernisation Initiative (PRMI). The initiative aims to accelerate growth and unlock investment opportunities by transforming the regulatory landscape.

What is PRMI?

Pakistan Regulatory Modernisation Initiative (PRMI) is a second-generation reform effort designed to build on the progress of the Ease of Doing Business (EoDB) programme. It is a concerted approach undertaken to eliminate, critically analyse, simplify, reengineer, improve, and digitalise business registrations, licences, certificates, other permits, and regulatory requirements.

Strategy and implementation at a glance

PRMI has one overarching strategic objective: To make it easier for businesses (local and foreign) to invest, operate and comply with Pakistan's regulations.

The implementation of PRMI's core activities will comprise two phases. The first phase will deliver a comprehensive inventory and mapping of regulations, including a parallel, optional legal framework. This framework would mandate eliminating all RLCOs that are not legally backed, are unnecessary, unjustified, and non-business friendly. In parallel, capacity building of public sector officials for undertaking regulatory reforms will be conducted. To this end, BOI will identify, analyse, and share recommendations for reforms with the relevant departments together with the federal working group and the private sector.

The second phase will focus on a comprehensive review of the remaining business regulations (RLCOs) at the federal, provincial, and municipal levels using stakeholder consultations and methodologies consistent with the regulatory impact assessment (RIA) principles. Best practise regulations will replace redundant and duplicative ones. Essential RLCOs will be simplified and streamlined. In lines with global best practices, a National Regulatory Delivery Office (NRDO) will be created and charged with improving regulatory quality through accountability, advocacy, capacity building, and promotion of a practical yet business-friendly regulatory enforcement culture. The approach suggested will require working across organisational boundaries and involving stakeholders from the federal and provincial governments. BOI will facilitate the transition from PRMI as a project to an institution. In doing so, it will transfer the responsibilities and knowledge acquired (on the design and implementation of regulatory reforms) to the newly established NRDO. A Pakistan Single Window (PSW) inspired model for the sustainability and automation of regulatory compliance in Pakistan will be espoused. The experience of regulatory reforms as part of EoDB and PSW in automating compliance will be extensively leveraged by the stakeholders involved in PRMI implementation.

The initiative will see the development of Pakistan Regulators' Guidelines (PRG) to promote transparency and proportionality in business regulation, which can be adopted by all three government levels. It will provide a flexible, principle-based framework for regulatory delivery and enable regulators to design their services and enforcement policies that best suit businesses' needs.

These principles of better business regulation will guide regulators to:

- carry out their activities in a way that will encourage those they regulate to comply and support their growth
- engage effectively with businesses and listen to their views

- base their regulatory actions on risk assessment
- maximise transparency by sharing information about compliance and risk
- freely provide compliance guidance and advice to those they regulate

Stakeholders

The National Steering Committee on PRMI will steer the initiative, facilitated by the Board of Investment, and supported by the National Coordination Committee of SMEs, working groups with representation from the business community and the government's three tiers as well as SMEDA. As a national regulatory reform effort, the scope of PRMI includes all government institutions and regulatory agencies across Pakistan as the stakeholders responsible for its success.

Programme Financing

PRMI will be financed through the Digital Economy Enhancement Project (DEEP) of Ministry of Information Technology and Telecommunication (MoITT) and the World Bank Group's International Development Association.

What constitutes success?

Upon its completion, the PRMI activities would have achieved the following milestones:

- Federal and provincial authorities are trained in designing and delivering effective, risk-based, and low-cost regulatory delivery and inspections.
- Elimination of all unnecessary RLCOs and regulatory requirements.
- Simplified, streamlined, and consolidated stock of RLCOs that parallels the top economies in the average time, cost, and procedures it takes to acquire them (as measured by the DB methodology).
- The PBP is rolled out nationally as a virtual one-stop-shop for dealing with RLCOs online. Ninety per cent of federal, provincial, and local RLCOs are administered, processed, and applied for online via PBP by 2023.
- The PRMI is institutionalised through establishing and operationalising NRDO.

Purpose and organisation of this document

PRMI Strategy and Implementation will help policymakers and regulators understand the initiative's objectives. It is structured to highlight the need for reforming business regulations followed by an introduction to PRMI objectives, the selected tools and approaches and the potential challenges expected in its implementation. The opening is followed by an emphasis on the organisational arrangement, stakeholder engagement needed to execute PRMI and to evaluate its progress. In conclusion, a case is presented to institutionalise the reform effort and ensure improvements in the regulatory environment are sustained in the long term.

This document provides insights into the theory and best practices of undertaking a comprehensive regulatory reform process. The steering committee will gather information and draw lessons from the initiative itself as it progresses. Therefore, **the PRMI strategic plan will remain a living document and reviewed annually** to help policymakers at all government levels in their regulatory reform agenda.

An overview of Pakistan Regulatory Modernisation Initiative

2021 ———————————————————————————————— **2025**

PLANNING

VISION

Improved regulatory environment as it pertains to businesses through mapping, simplification, and digitisation of regulatory procedures. A virtual one-stop-shop is created, and a regulatory oversight body established

TEAM

National Steering Committee on PRMI supported by a Project Management Unit at BOI to facilitate reforms effort through provincial working groups (and their PIUs), federal working groups, and the business expert groups

STRATEGIC COMPONENTS

- Mandated use of guillotine to eliminate unnecessary business regulations
- Creation of a digital catalogue of regulations to be retained, reviewed, or eliminated based on predefined guidelines
- Capacity building of participating actors in RIA, PRG and regulatory best practises
- Appointment of focal persons
- Principles of good regulations
- Pakistan Regulators Guidelines (PRG)
- Regulatory Impact Assessment (RIA)
- Public-private dialogues and stakeholder consultations
- Regulatory process re-engineering
- National Regulatory Delivery Office

TRAINING & CAPACITY BUILDING

EXECUTION – PHASE 1

LEGISLATION

Legal framework for 'regulatory guillotine' establishes the processes, institutions, schedule for a regulatory guillotine and passed by federal and provincial legislatures

DIGITALISATION

A comprehensive digital readiness exercise is undertaken to support the creation of the Pakistan Business Portal, taking place in parallel

RISKS TO KEEP IN MIND

- coordination
- capacity
- engagement
- digital transition
- sustainability
- legal mandate

PROCESS

1. PRMI team helps develop the legal framework for the reforms process (including regulatory guillotine).
2. All regulatory agencies within their jurisdictions classify and justify their regulatory instruments.
3. Provincial working groups prepare a list of RLCOs for elimination, and regulatory processes are redesigned, keeping the end-user (businesses) and public interests in mind.
4. The improved procedures are reviewed and analysed for their long-term impact, and streamlined changes are shared with the steering committee for public dissemination.
5. Refined regulatory instruments and processes are digitalised.

EXECUTION – PHASE 2

Pakistan Business Portal

Legal database of all regulations that are operational and a VOSS for compliance needs

REGULATORY IMPACT ASSESSMENTS

Filter the flow of new regulations and improve regulatory quality through Regulatory Impact Assessments (RIA)

GOVERNANCE & INSTITUTIONALISATION

A National Regulatory Delivery Office is created for regulatory oversight, to address business grievances and manage the flow of regulations while undertaking ex-post evaluations to sustain the regulatory reforms effort. Additionally, the NRDO will oversee a PBP management company's operations to ensure it continues to operate with the public's trust and in a transparent manner.

Additional responsibilities include:
- continued stakeholder consultations
- information dissemination
- coordinate nationwide reforms effort with federal and provincial agencies
- prepare annual reports on investment climate performance

Table-1: Summary of suggested short-term recommendations

Topics	Short-term recommendations (3-6 Months)
PRMI's Strategy	▪ The BOI circulates PRMI Strategy draft to the PRMI's Steering Committee and federal and provincial stakeholders for review and comments. ▪ The PRMI's Strategy is disseminated online on the BOI's website for broader consultation with stakeholders from the public and private sectors. ▪ The BOI incorporates the comments received from the PRMI's steering committee and federal and provincial stakeholders to finalise the PRMI Strategy. ▪ The PRMI steering committee approves the PRMI Strategy. ▪ CCI and competent provincial authorities approve the PRMI Strategy. ▪ The BOI organises a PRMI summit to launch the PRMI Strategy in the second quarter of 2021. ▪ The provincial governments launch the PRMI. ▪ The BOI organises a media briefing to disseminate the PRMI Strategy.
Regulatory Guillotine Law	▪ Explore legal strategies directed at guillotining the regulatory burden in their respective jurisdictions. ▪ The BOI (and the PRMI team) helps provinces (those who opt) in drafting legal frameworks of their own to mandate the use of a regulatory guillotine. ▪ The federal and provincial 'Guillotine Acts' enable the elimination of unnecessary RLCOs, administrative procedures and requirements. Furthermore, they enable the establishment of e-registry of RLCOs, the PBP and adoption of RIA to improve regulatory quality.
Federal, Provincial, and Regional Working Groups	▪ Provincial governments advise provincial working groups comprising public and private sector stakeholders. ▪ GB and AJK inform their working groups comprising public and private sector stakeholders. ▪ The federal and provincial working groups meet every two months to review the progress and guide the implementation of PRMI, focusing on establishing the regulatory footprint of each government organisation within their jurisdiction. ▪ The working groups take ownership of overall reform activities within their jurisdictions, overseeing that unnecessary and unjustified regulations are eliminated. The non-business friendly ones are simplified and automated. ▪ The BOI to organise onboarding workshops to ensure these working groups fully understand the PRMI objectives. ▪ PIUs assist each working group with technical support from BOI to coordinate with the focal persons in their respective jurisdictions and carry out the reforms process.

Topics	Short-term recommendations (3-6 Months)
Business Expert Groups	■ The BOI to notify business expert groups for priority sectors nominated by the relevant business/sector associations and public sector stakeholders. ■ The business expert groups meet regularly with focal persons to provide practical insights into businesses' regulatory burden and suggest reforms. ■ The BOI to organise onboarding workshops to ensure these working groups fully understand the PRMI objectives, strategy, and mechanisms.
Focal Persons	■ Focal persons of each federal and provincial regulatory authority (preferably with 8-15 years of experience in public service) are notified to support the PRMI's implementation. ■ The BOI to organise onboarding workshops to equip the notified focal persons with the essential knowledge to accelerate the PRMI's implementation—stocktaking, reforming, and automating regulatory compliance. ■ Focal persons take steps to start cataloguing RLCOs within their respective departments. ■ The BOI will inform the relevant federal and provincial departments to understand that the focal persons will continue for at least 2-3 years to ensure continuity and consistency in implementing the PRMI's activities.
Digital Platform	■ The BOI develops a platform to disseminate PRMI and related activities and decisions, including reforms completed. ■ The PRMI portal provides search functions to access RLCOs and all associated requirements and conditions. ■ The BOI ensures that the platform is developed to carry out all processes related to the regulatory guillotine exercise.

Early Harvest Reforms	■ The BOI, in collaboration with the federal and provincial working groups and business expert groups, will facilitate the identification of early harvest reforms in selected areas, including but not limited to:
	   ○ The Boiler and Pressure Vessels Registration process comes with various regulatory pre-requirements that are both time and cost intensive.
	   ○ Self-certification and third-party inspection/examination services follow a risk-based approach, especially for the boiler registration process, which requires six additional certificates, ten inspections, and three approvals as pre-requirements.
	   ○ Development of a risk-based framework to simplify food products' import process for registered manufacturers.

Table-2: Summary of suggested medium- and long-term recommendations

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
Pakistan Regulators' Guidelines	▪ The BOI leads the development of the Pakistan Regulators' Guidelines (PRG), building on the seven principles of better business regulation proposed in this strategy. ▪ The PRMI steering committee reviews and approves the PRG. ▪ The federal and provincial working groups review and approve the PRG. ▪ The federal and provincial working groups collaborate with the BOI to finalise PRG as an operating manual for regulators. It is reviewed and launched by the steering committee. ▪ The federal and provincial regulatory authorities endorse and adopt the PRG and submit an annual PRG Compliance Report to their respective working groups to review adherence to the PRG.	▪ The federal and provincial regulatory authorities endorse and adopt the PRG and submit an annual PRG Compliance Report to their respective working groups to review adherence to the PRG. ▪ The federal and provincial working groups continue to ensure complete adherence to the PRG within their respective jurisdictions.
Guillotine Guidelines	▪ BOI develops guidelines for the first round of classification of RLCOs, which the steering committee approves, and all working groups and PIUs adopt it. ▪ The guidelines are used for identifying clear cases of RLCOs for elimination and an opportunity to analyse the ones that are to be retained and revised.	
Cataloguing RLCOs	▪ The federal and provincial working groups work with their PIUs in ensuring that the regulating agencies share information on their regulatory instruments before the guillotine deadline, and with sufficient time to review and classify them according to the guidelines for guillotine exercise.	▪ The federal and provincial working groups continue to ensure the online catalogue of RLCOs is updated in real-time. ▪ The BOI coordinates with focal persons to ensure ongoing stocktaking and mapping of RLCOs in their respective departments. ▪ The BOI to organise periodic validation of RLCOs with public and private sectors at both the federal and provincial levels.
Reforming RLCOs	▪ The BOI imparts comprehensive training on regulatory design, principles, RIA and smart regulations to relevant authorities, empowering them to undertake reform activities proposed.	▪ BOI facilitates all stakeholders of PRMI (including working groups, PIUs, and regulatory authorities) in carefully analysing the remaining set of RLCOs not guillotined in Phase 2 of PRMI. Ex-post evaluations and regulatory impact assessments (RIAs), stakeholder consultations, PPDs are utilised before the second round of guillotine and elimination. The remaining RLCOs are simplified, and their delivery

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
	▪ The legal acts are drafted with the help of BOI and passed by federal and provincial legislatures to mandate a regulatory guillotine and establish institutions, processes, and timelines to execute it. ▪ Regulators (within their jurisdiction) justify the need for RLCOs they administer to their working groups and PIUs that review them in light of the guillotine guidelines and classify them into three categories: retain, review or eliminate. Input of private sector stakeholders is also taken into account, with contentious issues taken to appropriate forum for review. ▪ The recommendations of the working groups and PIUs are packaged into reform proposals with a deadline for regulators to respond. All RLCOs that either aren't communicated by the deadline or classified to be eliminated are guillotined. The remaining RLCOs proceed to Phase 2 of the reforms process.	process re-engineered before being automated and added to the Pakistan Business Portal (PBP). ▪ The BOI, in collaboration with federal and provincial working groups (including their PIUs) ensures that RIA is used as a vetting mechanism to control the flow of existing and future RLCOs, including their entry to the PBP.
Pakistan Business Portal	▪ IT assessment and preparedness surveys are carried out to identify the extent of automation in each government department/organisation. The BOI leads this initiative, and working groups facilitate the process. ▪ In collaboration with the federal and provincial working groups, the BOI organises consultations for the design and development of PBP as a national one-stop-shop for applying, renewing, and paying for RLCOs at the federal and provincial levels. ▪ RLCOs that pass the review and streamlining are uploaded to PBP in batches or modules while reviewing additional RLCOs continues.	▪ In collaboration with the federal and provincial working groups, the BOI designs the institutional, legal, and operational model for establishing the PBP as a corporate body by the end of 2022. ▪ The PBP Company is established and operationalised by June 2023, for which the federal government provides the seed financial resources. ▪ In collaboration with the federal and provincial working groups, the BOI ensures provincial business portals' connectivity to the PBP in 2023. ▪ The PBP is rolled out in a phased manner for use across Pakistan in 2023.
Establishing National Regulatory Delivery Office (NRDO)	▪ The BOI to develop an institutional and legal roadmap for establishing the NRDO. ▪ The PRMI's steering committee reviews the proposed institutional and legal roadmap for establishing the NRDO. ▪ The BOI consults the federal and provincial working groups to finalise the institutional and legal roadmap for establishing the NRDO.	▪ The federal and provincial working groups endorse the institutional and legal roadmap for establishing the NRDO. ▪ The PRMI's steering committee approves the institutional and legal roadmap for establishing the NRDO. ▪ The parliament passes the NRDO Bill by June 2022. ▪ The notification for establishing NRDO is issued by September 2022. ▪ The NRDO is operationalised by December 2022.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
	▪ The proposal for establishing the NRDO is published on PRMI's portal for crowdsourcing feedback and validation.	
Business Registrations	▪ Various authorities at federal, provincial and local levels that are involved in registering businesses collaborate with the federal and provincial working groups to develop an institutional, legal, and operational model for setting up the Pakistan Business Registry (PBR) for registering all types of businesses—limited liability companies, partnerships, and sole proprietorships. ▪ Allow foreign companies to apply for NOC from the Ministry of Interior alongside business registration.	▪ The PRMI's steering committee endorses the institutional, legal, and operational model for setting up PBR. ▪ The provincial governments approve an institutional, legal, and operating model for setting up PBR. ▪ The federal government approves the proposal for setting up PBR. ▪ The PBR Bill is submitted to the parliament for enactment by December 2021. ▪ The PBR is established and operationalised by June 2022. ▪ All federal and provincial business registrations (provincial industries' departments, social security institutions, labour departments, and Employees Old-Age Benefits Institution) are integrated into the PBR.
Business Licencing	▪ Both the federal and provincial working groups ensure their respective regulatory authorities convert low-risk licences to declarations. ▪ Replicate the reforms of the Khyber Pakhtunkhwa Government which has simplified municipal level trade licences, in Pakistan's other provinces.	▪ The BOI will build the capacity of federal, provincial, and local authorities issuing business licences to carry out risk assessments for different types of businesses and review the existing licencing regime. ▪ Eliminate licences either being used as quasi-taxes or those not abiding by the seven principles of better business regulation. ▪ The BOI will explore developing a framework for 'one-business, one-licence application' per economic activity approach and increase the renewal period of licences to at least five to ten years. Explore future elimination of all renewals. ▪ The federal and provincial working groups will explore developing a framework, endorsed by the PRMI's steering committee, for mutual recognition of licences extending these instruments' validity to all subnational jurisdictions.
Dealing with NOCs	▪ In collaboration with the federal and provincial working groups and business expert groups, the BOI would develop a framework for dealing with NOCs using the seven principles of better business regulation.	▪ Explore the use of independent third-party verifications in place of essential NOCs. ▪ Design a framework for accrediting third-party companies that will carry out the inspection and verification process.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
	▪ Explore self-certifications instead of nonessential NOCs. ▪ Explore shifting the responsibility of getting essential NOCs to the requesting agencies.	
Risk-Based Classification of Regulatory Instruments	▪ Introduce a risk-based system to convert ex-ante inspections to self-certifications for obtaining RLCOs. ▪ Develop a common risk classification framework for the use of objects to be adopted by all regulatory agencies involved in permits (municipalities, safety inspectors and health authorities).	
Dealing with Business Inspections	▪ In collaboration with the federal and provincial working groups and business expert groups, the BOI develops a framework for dealing with business inspections using the seven principles of better business regulation. ▪ Pilot ex-post joint inspections for high to medium risk business activities in at least one district of each province.	▪ Reduce the burden of inspections on low-risk business activities. ▪ Explore increasing the use of ex-post joint checks for high to medium risk business activities across Pakistan. ▪ Introduce private solutions in business inspections through accredited third-party companies.
Utility Applications (electricity, gas, and water)	▪ In collaboration with the federal and provincial working groups and business expert groups, the BOI develops a framework for simplifying the process of getting utility connections.	▪ Ensure all utility applications/approvals and administrative fees can be completed online, including supporting documents.
Clearly Defined Regulatory Jurisdictions	▪ The BOI creates a defined list of RLCOs applicable at the federal level with nationwide validity. ▪ The steering committee supports consensus building to guide provincial and local governments to refrain from regulating activities under the federal purview to prevent duplication and induce regulatory easing.	▪ Through a national consensus, the steering committee proposes amendments to local government acts, ensuring 'tactical' RLCOs, particularly relating to zoning, fire protection, and health, are kept at the local level and under the local governments' purview.
Pilot Regulatory Harmonisation and Mutual Recognition	▪ The BOI engages the federal and provincial working groups (including business expert groups) to identify and propose harmonisation solutions. A cross-recognition scheme of regulatory procedures is introduced in three to four major cities as a pilot study.	▪ Explore solutions that allow regulatory interoperability between these four business centres of Pakistan with the prospect of having valid RLCOs in one jurisdiction be applicable in the other three. ▪ Following from the above, explore the formulation of standardised cross-recognition agreements for RLCOs at provincial levels.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
Unified Taxonomy	■ Establish a common taxonomy for business regulation instruments with a nationwide application.	■ Implement the semantic changes to all existing and proposed RLCOs nationwide.
Capacity Building	■ The BOI to organise onboarding workshops for focal persons, the federal and provincial working groups, and business expert groups to build awareness of PRMI objectives and activities. ■ The BOI to organise thematic workshops to ensure focal persons and related officials have the knowledge and tools to leverage principles of better business regulations, including risk management and RIAs.	■ The BOI collaborates with OECD and academia to develop a comprehensive curriculum surrounding regulatory affairs to equip government regulators and compliance officers in the private sector to address regulatory statutes. It can later take the shape of a graduate program in regulatory affairs, endorsed by HEC and offered through accredited universities' public policy departments.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
Sector-specific recommendations		
Food Sector	• Conduct a 360-degree review of all regulatory issues that represent barriers to growth and investment. Respective working groups utilise the guillotine guidelines, PRG, and the tools introduced through PRMI to address these issues within their jurisdictions. • In collaboration with the Ministry of Science and Technology (MoST), provincial working groups, and business expert groups, the BOI develops an implementation roadmap for harmonising food quality and safety standards across provinces. • Provincial working groups work towards modernising market committees. • Streamline the process and reduce time to obtain PSQCA certification for food standards from up to 90 days to seven. • BOI to consult relevant stakeholders and the food sector's business expert group. It will do this to explore exemptions from the 'Plant Protection Release Order by Department of Plant Protection, MNFSR' for registered manufacturers to import samples of edible items.	• Collaborate with the provincial and federal agencies to create an online platform for food businesses to meet all concerned authorities' licensing and product registration requirements. • Set clearly defined and transparent timelines for obtaining certifications, registrations, and permits pertinent to food products. These include but are not limited to the permit to import food colour products, storage of food supplies, and standards and safety authorisations from food authorities.
Pharmaceutical Sector	• BOI to work with the relevant regulators, working groups, and pharmaceutical-specific business expert groups to explore simplification of the NOCs associated with manufacturing scheduled pharmaceutical ingredients. • BOI facilitates a 360-degree review of all regulatory issues representing barriers to growth and investment in the pharmaceutical sector and organizes PPDs to address them.	• Re-engineer, simplify, and provide digital regulatory authorisations needed to manufacture and store pharmaceutical-grade chemical agents with binding timelines to reduce the time and effort spent by businesses on compliance. • Where necessary, reduce regulatory paperwork and burden by introducing accredited third-party inspections to expedite the approval process for obtaining authorisations related to the manufacturing of pharmaceutical ingredients.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
Auto Sector	▪ Eliminate the need for NOCs by district authorities for setting up an automotive manufacturing plant as this requirement appears redundant in the presence of a local government trade licence. ▪ BOI facilitates a 360-degree review of all regulatory issues representing barriers to growth and investment in the auto sector and organizes PPDs to address them.	▪ Undertake industry-level improvements by revisiting statutory regulatory orders (SROs) and tariff-based protection schemes to encourage localisation. ▪ Develop an automotive institute to help improve the quality standards of locally produced automotive and auto parts, promote knowledge sharing, international collaborations, and develop regulatory guidelines for emerging technologies. ▪ Explore using third-party services to accredit manufacturing processes and approve vehicle certifications and other vehicle safety certifications under Pakistan New Car Assessment Programme (P-NCAP).
IT Sector	▪ The BOI facilitates a focused PPD of all stakeholders to simplify and streamline foreign exchange regulations and enable IT companies to fulfil their operational and contractual obligations. ▪ The BOI facilitates the introduction of simplified 'doing business guidelines' for start-ups, particularly those incubated within national incubation centres, by removing the need for compulsory registrations other than with PSEB until they have an annual turnover of at least PKR50 million.	▪ Explore opportunities to simplify foreign exchange laws, rules, and instructions issued by SBP and amend them to reflect good international practises to facilitate technology companies with global offices. ▪ Explore complete deregulation of the IT sector based on its low-risk profile and propensity to boost exports. A clear definition of IT company can be established following which all businesses falling in that category will require just one registration by the PSEB.
Textile Sector	▪ The BOI will consult with relevant stakeholders and business expert groups nominated for a 360-degree review of regulatory issues and help reduce compliance costs that prevent growth within the sector.	▪ Undertake comprehensive analysis of customs, sales tax, and income tax laws and regulations relating to Duty and Tax Remission (DTRE) schemes, manufacturing bonds, EoU rules, and temporary import rules to streamline processes.

Topics	Medium-Term Recommendations (1 Year)	Long-Term Recommendations (2-3 Years)
Housing and Construction Sector	■ The BOI works with concerned authorities (federal, provincial and local) to: ○ Strengthen service standards and time limits for construction approvals and make them publicly available online. ○ Increase awareness-raising efforts on recent reforms and clarify the legal requirements to avoid over-compliance and close implementation gaps. ○ Establish a dedicated and independent mechanism to track and deal with complaints related to property registration. ○ Fully automate the process of paying stamp duties. ○ Ensure full automation of the procedure to obtain the sales certificate (NOC). ○ Review land-related procedures at the respective boards of revenue to identify bottlenecks and explore ways to streamline the deed execution, registration, and scanning processes.	■ The PRMI steering committee ensures that all approval processes and regulatory authorisations associated with construction and housing are: ○ Fully digitalised, allowing businesses and citizens to apply and pay for concerned permits and approvals online. ○ Transparent ○ Free of regulatory capture ○ Completed without any deliberate delays
Logistics Sector	■ The BOI works with relevant stakeholders to review the changes required to the laws and regulations in light of the industrial modernisation witnessed in the last few decades. Key issues highlighted by the private sector that need to be addressed via PPDs include: ○ Revision of The Provincial Motor Vehicle Ordinance, 1965. The ordinance sets out the eligibility criterion for the HTV licence. Only drivers holding an LTV licence issued for more than three years qualify. This criterion creates a shortage of drivers in the market to fulfil the market need. ○ Defining control measures in regulations for plying old vehicles on the road. ○ Defining loaded weight to engine capacity ratios in regulation to monitor the operational health of the vehicle for road traffic safety. ○ Establishing uniform vehicle registration process and applicable fee across the country. ○ Establishing a control mechanism to monitor the time spent on the road by a vehicle.	
Tourism and Hospitality Sector	■ The BOI works with relevant stakeholders to revive the tourism and hospitality industry affected by the COVID-19 pandemic. This includes experimenting with new financing mechanisms and government-backed equity funds to help sustain crisis hit hospitality related SMEs.	■ Window for investor facilitation established and investment strategy for tourism and hospitality prepared and launched with inputs from PTDC and relevant provincial stakeholders.

1 INTRODUCTION

Businesses in Pakistan routinely cite regulatory compliance as one of the critical challenges to their competitiveness. They must obtain several registrations, licences, certificates, and other kinds of permits (RLCOs) to operate lawfully in the market. The situation becomes increasingly complicated when the country bases its regulatory regime on a three-tiered compliance structure administered on federal, provincial, and municipal levels.

The regulations themselves are, in many cases, a product of numerous amendments over the years. Their associated procedures are opaque (generally not in the public domain), labour-intensive (and hence costly for the administering agency), time-consuming for applicants (often with unpredictable outcomes), and uncoordinated across federal, provincial, and municipal boundaries. This situation imposes high costs on businesses and provides incentives to avoid or evade compliance.

The complex regulatory environment has contributed to Pakistan's weak private sector investment performance, with overall private investment as a percentage of gross domestic product (GDP) standing at around 10 per cent in recent years. In comparison, foreign direct investment (FDI) to GDP was a mere 0.6 per cent in FY19, well below the country's regional peers[1]. In the World Economic Forum's survey on the *Burden of Government Regulation in 2017* (using a scale of 1-7 with seven as the best), Pakistan scored 3.49—less than its neighbours India (4.32) and China (4.38).[2] The multi-tiered administration of regulatory requirements in Pakistan further adds to the compliance burden, discouraging businesses from entering the formal economy and reducing their growth potential (see Box-1 for an overview of the regulatory burden on three industrial sectors).

> **Box-1: Federal and provincial business regulations in auto, agriculture, and pharmaceutical sectors**
>
> Federal, provincial, and local governments regulate businesses in Pakistan. Enforcement, as a result, happens nationally and locally. The regulatory instruments consist of licences, registrations, certificates (including no-objection certificates), and other permits and accreditations. These instruments for business regulations are derived from an eclectic mix of new and old laws, most of which predate Pakistan's formation.
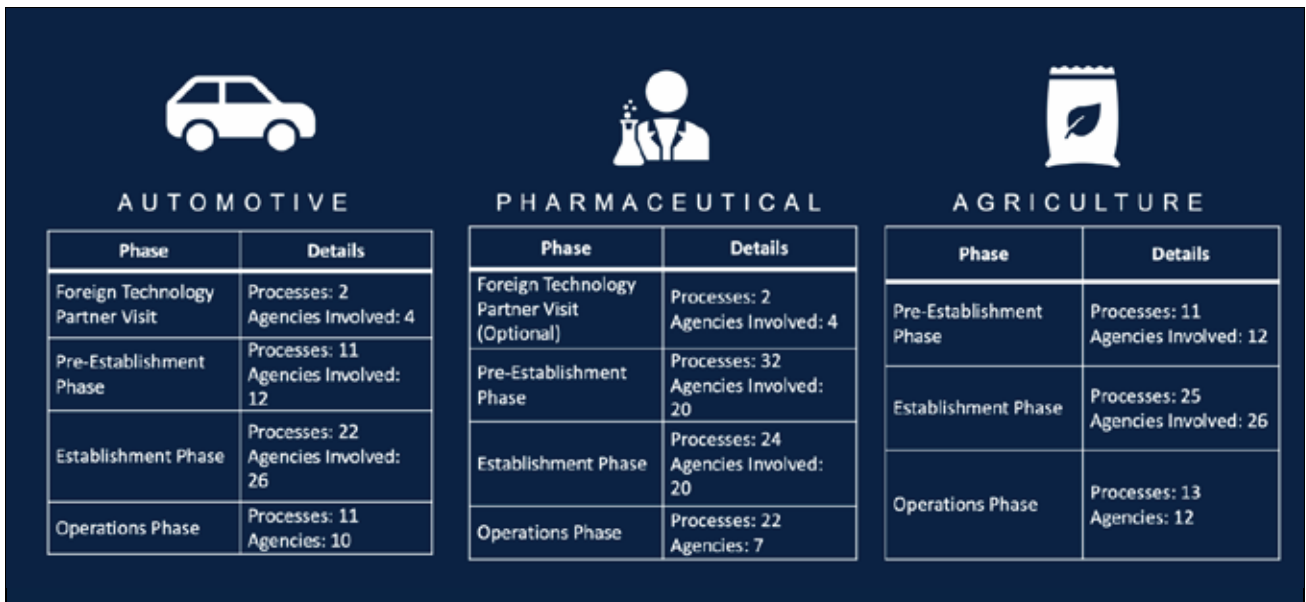>
> Besides regulations that all businesses generally must comply with, there are activity and sector specific RLCOs enforced. The number of regulatory procedures and agencies involved at each stage of development for the industry are illustrated below for three sectors based on their importance to the national economy.

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[1] See 2019 Investment Climate Statements: Pakistan, published by the U.S. Department of State.
[2] See GovData360: Burden of government regulation, 1-7 (best). (n.d.). GovData360.
https://govdata360.worldbank.org/indicators/govt.regu?country=BRA&indicator=689&viz=line_chart&years=2007,2017#table-link

AUTOMOTIVE

Phase	Details
Foreign Technology Partner Visit	Processes: 2 Agencies Involved: 4
Pre-Establishment Phase	Processes: 11 Agencies Involved: 12
Establishment Phase	Processes: 22 Agencies Involved: 26
Operations Phase	Processes: 11 Agencies: 10

PHARMACEUTICAL

Phase	Details
Foreign Technology Partner Visit (Optional)	Processes: 2 Agencies Involved: 4
Pre-Establishment Phase	Processes: 32 Agencies Involved: 20
Establishment Phase	Processes: 24 Agencies Involved: 20
Operations Phase	Processes: 22 Agencies: 7

AGRICULTURE

| Phase	Details
Pre-Establishment Phase	Processes: 11 Agencies Involved: 12
Establishment Phase	Processes: 25 Agencies Involved: 26
Operations Phase	Processes: 13 Agencies: 12

It is essential to highlight that the public functionaries understand the need to improve Pakistan's investment climate. Recent efforts at both national and provincial levels have led to significant improvement in Pakistan's ranking on the World Bank's Ease of Doing Business index and has provided an impetus for further reforms in Pakistan's regulatory landscape. With the immediacy of pandemic response, there is a need to support economic recovery via a comprehensive and fast-tracked regulatory reform effort. This urgency for reform stands as the fundamental motivation behind PRMI.

1.1 THE SCOPE OF PRMI STRATEGY AND IMPLEMENTATION PLAN

The PRMI will modernise business regulations in Pakistan through a structured approach for stocktaking, eliminating (guillotine), simplifying, and automating compliance with all business regulations (RLCOs) across federal, provincial, and local jurisdictions. Its scope includes all rules and administrative procedures as they apply to businesses across Pakistan, including its provinces and federal territories. However, it does not include tax administration reforms and cross-border trade which are being addressed in parallel by FBR and Pakistan Customs. PRMI will prioritise removing unnecessary red tape and complex compliance procedures that pose a disproportionate burden on small and medium-sized enterprises (SMEs). Addressing these challenges will directly benefit businesses in several ways contributing to improving their investment, productivity and growth performance (see the list in Figure-1).

The implementation of PRMI is sanctioned by the Prime Minister's Office and supported by the World Bank Group as well as the Foreign, Commonwealth and Development Office of United Kingdom to energise business growth with smart, business-friendly regulations and develop the infrastructural capacity needed to ensure the regulatory regime remains relevant to business and community needs. A PRMI National Steering Committee will lead it with broad representation from relevant stakeholders, including the national coordination committee (NCC) on SME.
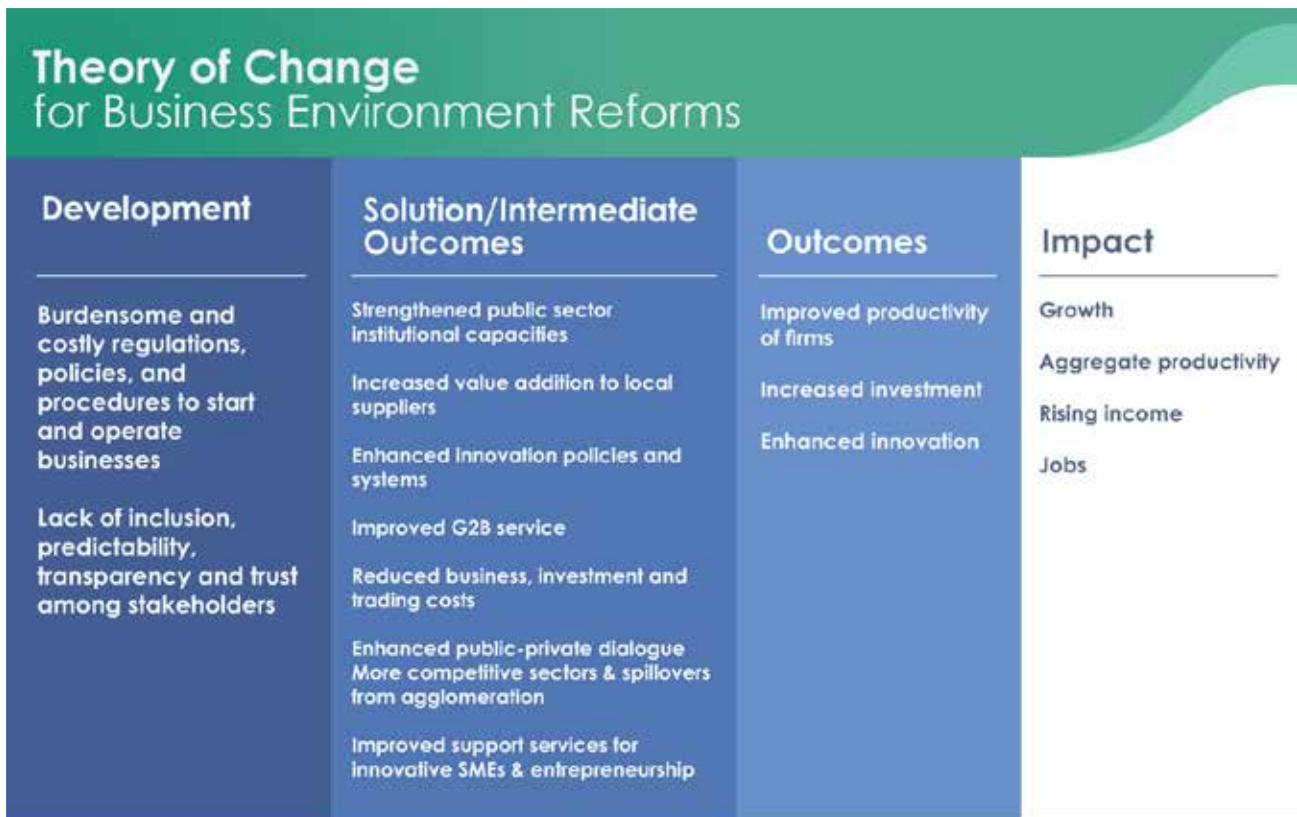
The *PRMI Strategy and Implementation* offers a roadmap for creating an enabling regulatory environment for businesses in Pakistan. It will guide the regulatory authorities on how to:

- Implement a comprehensive and fast-tracked effort to improve regulatory quality and eliminate unnecessary regulations and administrative procedures.
- In parallel and for the provinces that opt for it, develop a legal framework to build an inventory of the existing RLCOs, implement a mandatory fast-track approach (guillotine) to identify and eliminate unnecessary, redundant, cumbersome regulatory compliance processes and procedures.
- Set up the institutional framework for an ongoing regulatory quality assurance system.
- Develop PBP as a single future repository of all remaining RLCOs, administrative requirements and conditions, and online channel for obtaining comprehensive information, applying, renewing, and paying fees online for business regulation procedures.

1.2   CORE OBJECTIVES AND ACTIVITIES

The core objectives of PRMI, synthesised through extensive stakeholder consultations and situation analysis, are to:

1. Train public servants in designing better regulations and enforcement mechanisms, in undertaking RIAs and utilising various tools and approaches to improve regulatory quality and delivery.

2. Reduce the regulatory compliance burden on new and existing firms and, in particular the disproportionate burden on SMEs, which has become essential for relief, recovery, and resilience efforts in the wake of the COVID-19 crisis.

3. Leverage automation to encourage regulatory compliance and enhance regulators' effectiveness to manage the risks that emerge from unregulated economic activities. Ensure that by the end of 2023, 90 per cent of all federal, provincial, and local RLCOs are applied, renewed, and paid for online.

4. Optimise the time, costs, and procedures associated with RLCOs by aligning each with its counterpart for top economies as identified in the World Bank's ease of doing business index.

The PRMI National Steering Committee will drive the implementation of PRMI to achieve these core objectives. While most reform activities will be executed in parallel by the working groups, others will take a sequential approach (through BOI's assistance), including:

- Developing a legal framework, guidelines, and instruments to implement a comprehensive mandatory review of existing RLCOs, requirements, and conditions.

- Adopting a legal framework and a regulatory management system comprising a unified set of principles and methodology to review, simplify, and consolidate and eliminate all unnecessary, unjustified, outdated, and repetitive RLCOs to improve regulatory quality and coherence.

- Setting up appropriate structures (working groups, PIUs, and network of focal persons) to support the comprehensive and fast-tracked regulatory reform process proposed under PRMI.

- Capacity building of structures mentioned above to implement PRMI.

- Developing the PBP as an online platform for compliance and administration of all RLCOs.

- Institutionalising the regulatory reform process to maintain the reform activities' momentum and ensure attention to risk-based reform of business regulations.

1.3 CORE PRINCIPLES

A set of seven fundamental principles of better business regulation will guide the PRMI implementation:

1. **Regulatory Delivery:** When possible, prefer ex-post supervision over ex-ante approval of regulatory instruments.[3]

2. **Transparency:** Ensure full transparency by disseminating in the public domain both operative rules and relevant procedures.

3. **Risk management:** Identify and mitigate risks associated with an activity instead of an umbrella approach covering all activities of a business (see Box-2). Regulation of each activity should be linked to the risk level associated with the action.

4. **Efficiency and effectiveness:** Assess impacts and review regulations systematically to ensure that they meet their desired objectives in a changing and complex economic and social environment, without limiting competition.

5. **Simplification:** Eliminate unnecessary regulatory barriers to trade and investment through continuous review of regulatory requirements and conditions.

6. **Proportionality:** Regulations should only be used when necessary, with remedies for non-compliance appropriate to the risks posed and costs identified and minimised.

7. **Set fees based on cost recovery:** Business regulation fees should be based on the recovery of costs to administer regulations and not as a revenue source.

The PRMI team will use these principles to develop a set of guidelines for reviewing RLCOs, requirements, and conditions under a guillotine approach. It will also be converted into a **Pakistan Regulators' Guidelines (PRG)**

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[3] Ex-post supervision seeks to ensure regulatory compliance after a business is operational and reduces the regulatory hurdles faced when starting up. Ex ante regulation seeks to identify problems beforehand and shape stakeholder behavior and responses through regulatory intervention.

for adoption by federal and provincial regulatory agencies. The proposed PRG will guide regulators to effectively deliver regulatory services while achieving their common social, environmental, and public protection objectives following good global practices. The PRG would be embedded in the legal framework for NRDO, thereby ensuring that existing and new regulations are transparent and based on sound principles of proportionality. The PRG would permanently anchor the same principles followed in the fast-track review of existing RLCOs.

Box-2: Risk-based business regulations

Business regulations, including licences and other types of authorisations, are typically imposed to safeguard citizens and the environment from potential risks posed by economic activities. Risks can be verified at application for authorisation to start business activities. Permanent rules for business activities (business conditions) are also established for the same purpose and verified through inspections along the business's life cycle.

Risk-based regulation means adapting the government's degree of regulatory control to the actual hazards and level of severity posed by industry sectors, economic activity, or business establishments. Risk is the combination of the likelihood of an adverse event (like a hazard or harm) occurring and the potential magnitude of the damage caused (e.g., number of people affected and severity of the damage for each).

Global experience shows that risk profiles of business establishments usually have three levels:

1. **Low-risk** businesses require less stringent requirements, fewer ex-post checks, less frequent or no licence renewal requirements, and fewer regular inspections. In some jurisdictions, self-reporting, information provision, and voluntary certification could suffice. Typical examples of low-risk activities would be consulting services (or any other professional services), a bookstore or most retail trade establishments.

2. **Medium-risk** businesses would have moderate requirements compared to low-risk establishments. It may include a compliance audit, third-party certification, and a reasonable number of inspections. For instance, restaurants, hotels, and most food retail establishments would be in this category.

3. **High-risk** establishments may require strict enforcement and the fulfilment of ex-ante requirements, frequent licence renewals, and regular inspection visits. A gas station, manufacturing of chemical products, or hospitals are examples of business activities considered high-risk.

A well-designed risk-targeting approach would distinguish among businesses' activities and build on scientific evidence. It could also be subject to expert judgement, previous experiences, and information on incidents. These approaches should be assessed and reviewed periodically to introduce updates and changes to ensure their relevance and usefulness.

Regulating agencies can use risk assessment tools and checklists for inspections conducted in a wide range of regulatory areas such as labour, customs, tax, environmental protection, building and fire safety, and occupational health and safety. In this case, a risk assessment tool should comprise risk criteria and a rating scheme for facilities, built around the profile of the business (sector, type of activity, products, location, size, and systems applied) and also around the compliance history of the business such as number/type of violations, warnings, and citizen complaints.

Adopting a risk-based approach to business regulation supports public policy objectives by targeting activities or objects that pose the highest risk to general wellbeing while making better use of government resources by directing them where most needed. It also reduces burdens for most businesses as lower-risk sectors and firms are subject to lighter requirements and lower compliance burdens. Compliance is improved, and firms benefit from a more level playing field.

The proposed PRG would apply to all governmental entities regulating businesses across all industries, sectors, and governance levels. It will contribute to institutionalising the PRMI for sustainable improvements in the overall regulatory environment across Pakistan.

1.4 CHALLENGES AND THE NEED FOR AGILITY

The PRMI Steering Committee will review the strategy and implementation guidelines developed for PRMI annually for the first two years and then every two years subsequently. However, in line with the challenges identified in Figure-2, the implementation plan may require frequent revisits in its first year to cater to on-ground realities. The objective here is to ensure the private sector feedback and provincial reform plans (for which regulatory stocktaking and mapping is underway) are fully integrated into the PRMI Strategy and Implementation. Additionally, this agile and evidence-based approach will help monitor implementation progress, identify new reform areas, highlight challenges, and build partnerships with relevant public and private sector stakeholders along the way.

Figure-2: PRMI risk register

Type of Risk	Description of Risk	Probability			Impact Category (Performance, Time, Cost)	Risk Response Strategy
		H	M	L		
Coordination	The risk stems from limited regulatory reform and implementation coordination at all three levels of the government that have overlapping and competing regulatory mandates		●		Affects all three	Regular meetings of the PRMI Steering Committee and Provincial Working Groups to monitor progress of the PRMI Strategy and Action Plan implementation as well as access to information through the PRMI Portal will help mitigate the coordination risk.
Capacity	Limited understanding of the principles of good regulatory practices among regulators and public sector officials may hinder reform progress	○			Performance and Time	The BOI will organize regular face to face and online capacity building activities, involving training in common principles of good regulation particularly adopting a risk management approach towards business regulation, to ensure focal persons and responsible officials are provided with knowledge required to design and implement reform on sustainable basis.
Engagement	Limited involvement of the private sector in prioritisation and implementation of the regulatory reforms		●		Performance	Active engagement with the private sector to ensure their feedback is reflected in the design and implementation of the reforms as well as in closing the gap between the intent and the practice of regulation.
Digital Transition	Limited knowledge and use of online technology to deal with RLCOs may hinder transition to PBP	○			Performance	The BOI will organize digital onboarding for all the regulatory agencies to ensure that regulators are able to receive, review and approve RLCOs online.
Sustainability	Absence of dedicated institutional and organizational arrangement may disrupt the present momentum for reforms going forward		●		Affects all three in the long term	The establishment and operationalization of NRDO will help mitigate the sustainability risk. The NRDO will also help to ensure that a standardized and coordinated approach is adopted for regulatory reforms
Legal Mandate	Potential questioning or confrontation in courts over the legal frameworks for Federal and Provincial levels that mandate listing existing and elimination of unnecessary RLCOs.	○			Affects all three	A careful legal design will be implemented with the help of legal experts. Stakeholders will be approached under stakeholder engagement strategies described in this document

1.5 STRATEGIC APPROACH

PRMI considers a two-phased strategic approach. The first phase will ensure a legal database of RLCOs (and regulatory procedures and pre-requirements) has been created to support a fast-tracked elimination of unnecessary regulations, requirements, and conditions. It will be followed by a more comprehensive review of RLCOs and further elimination, process re-engineering, simplification, and automation of regulatory service delivery (see section 3.1 for an illustrative description of the reforms process).

As a comprehensive reform process, PRMI targets the whole regulatory system (as it applies to businesses) to identify, review, and eliminate unnecessary regulations. The first step here would be to construct an inventory of rules, requirements, and conditions. To this end, business regulators will receive a mandatory request to file their respective inventories by a given deadline. Any regulation, provision, or condition not filed by the deadline would then be sought for legal elimination.

The first round of review of the initial inventory will use guidelines to identify and eliminate evident cases of regulations, requirements, or conditions that are not legal or have no clear justification.

Using sound regulation principles, the second round of review of the remaining inventory would cover a more comprehensive analysis in light of the Pakistan Regulators' Guidelines. Regulators would need to present structured justifications for each regulation, requirement, and condition they propose to maintain. PRMI PIUs would review these justifications and conclude a classification that would place each regulation, requirement, and condition into three categories. The ones that could not be appropriately justified would be eliminated, while the ones with proper justification maintained. A third category would identify regulations requiring process re-engineering for simplification and making them more business friendly. PRMI will adopt a regulatory reforms approach that utilises international best practices (see Box-3) but is tailored to the requirements of Pakistan.

**Box-3: Effective use of the guillotine approach in comprehensive business reforms**

The 'guillotine approach' is a practical tool tried in several countries for comprehensive business regulation reforms. The World Bank Group's global experience highlights specific aspects that need to be addressed for a successful and impactful application of the guillotine approach. The strategy design for the implementation of PRMI has considered all these points:

- As the process of collecting information and building an inventory of regulations is lengthy and costly, the laws for regulatory guillotine (federal and provincial) must provide a robust and enforceable legal mandate to get from regulators the information by a specific deadline. The use of new technologies could help accelerate building an inventory, including mapping processes, requirements, and conditions, and updating it. For instance, the mapping of requirements and procedures could use artificial intelligence/natural language processing to scan all laws and regulations and extract the information automatically.

- It has proven difficult in several countries to obtain relevant information from businesses or the general public for listing regulations, procedures, or requirements. It is possible that authorities dealing with businesses lack full understanding of the details underpinning their regulatory instruments. PRMI includes on-going public-private dialogues and consultations on specific regulations that come through the first and second phases for process improvement or adjusting requirements or conditions but would not rely on private parties' information for building the initial inventory.

- The review and analysis of inventory items could take time and while the review is being conducted, new laws/regulations could be issued, including reinstating rules eliminated in the first round. Thus, the laws for regulatory guillotine would include the most appropriate provisions for stopping or limiting new rules at all levels between the deadline for the first phase and the implementation of RIA review of all new regulations.

- Global experience shows that businesses typically complain more about the uncertainty and are unable to find information on requirements than the length and cost of procedures, which are the focus of fast-track elimination efforts. PBP development as part of PRMI assures that comprehensive and transparent information is made available from the start of the process, and introduce an institutional setting, ensuring maintaining information updated through a PBP entity.

- Fast-track elimination of regulations can be beneficial in removing marginal licences that might not impact businesses. In contrast, more complicated cases of licences affecting a large number of businesses remain in place after the initial review. PRMI is, thus, considering the second round of review, following the logic of the guillotine approach, but with more substantial reviews, suited for cross-cutting and vital regulations. A comprehensive business regulation reform programme will always face a lot of pushback and opposition, so it is also essential to include stakeholder consultation and initiatives for building momentum for reform as considered by PRMI.

- A frequent challenge of using the guillotine approach is building a repository of laws, regulations, requirements, and conditions that have so-called positive legal security (i.e., being the single official repository) and is updated regularly. PRMI includes the development of PBP as the future single repository.

- Targeted, sector-specific approaches have proven useful in the implementation of business regulation reforms around the world. In this case, eight priority sectors are identified: food production, auto manufacturing, IT, textiles, logistics, housing and construction, tourism, and pharmaceuticals. Each sector will undergo a 360-degree review of barriers for business and, in turn, address these obstacles. PRMI will tackle horizontal cross-cutting regulations for all sectors and work on deep-dive programmes for the eight priority sectors mentioned above.

2 INSTITUTIONAL SETUP FOR IMPLEMENTATION OF PRMI

The institutional design proposed for implementing the PRMI will improve coordination between implementation units, working groups, regulators, and the private sector (including the business expert groups). A project management unit (PMU) at BOI will function as the PRMI secretariat tasked with coordinating and facilitating the implementation of PRMI. Additionally, the PMU will provide technical support to provincial PIUs to help them with regulatory process simplification and preparation for integration into the PBP. The PRMI Steering Committee, led by the prime minister's advisor on commerce and investment, will provide comprehensive guidance and leadership for the reform programme (see Figure-3).

Figure-3: PRMI implementation – an organisational overview
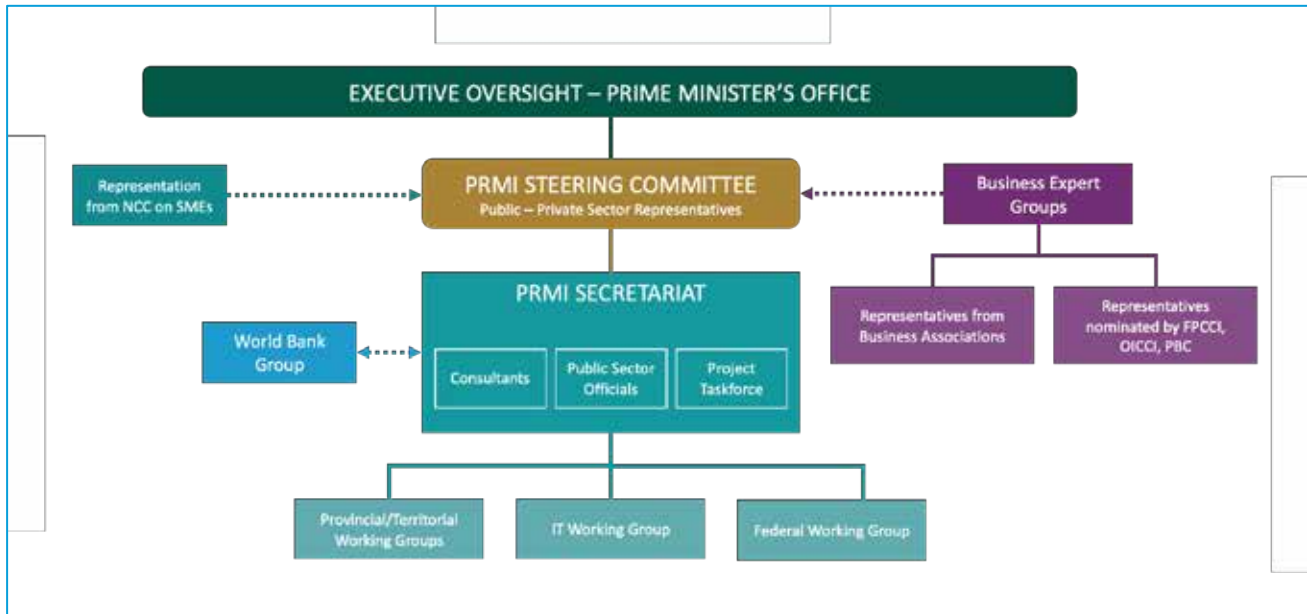
2.1 DRIVERS OF IMPLEMENTATION

The PRMI Secretariat will coordinate with the leadership of provincial and federal working groups to help drive the initiative. The coordination effort will rely on the following drivers of implementation:

1. Imparting training on design and analysis of regulations, principles of good regulations and RIAs and public regulatory affairs management
2. The leadership of the federal and provincial working groups
3. Supervision of the PMU
4. Continuity of focal persons
5. Support of business expert groups
6. Dialogue with stakeholders in the public and private sector
7. Capacity building

2.1.1 FEDERAL AND PROVINCIAL WORKING GROUPS

The federal and provincial working groups will mainly drive the PRMI implementation. These groups will include national and subnational regulators, business associations, and chambers of commerce. In addition to having their own PIUs, the working groups will work closely with PMU. They will undertake a fast-track elimination of unnecessary RLCOs (including optional use of guillotine approach), simplification, and automation of regulatory processes within their jurisdiction (see Figure-4 below). Similarly, the provincial working groups led by their respective chief secretaries will be vital for driving the reform process. They will also include members from the local chambers of commerce, regulators, and relevant provincial secretaries representing their respective departments.
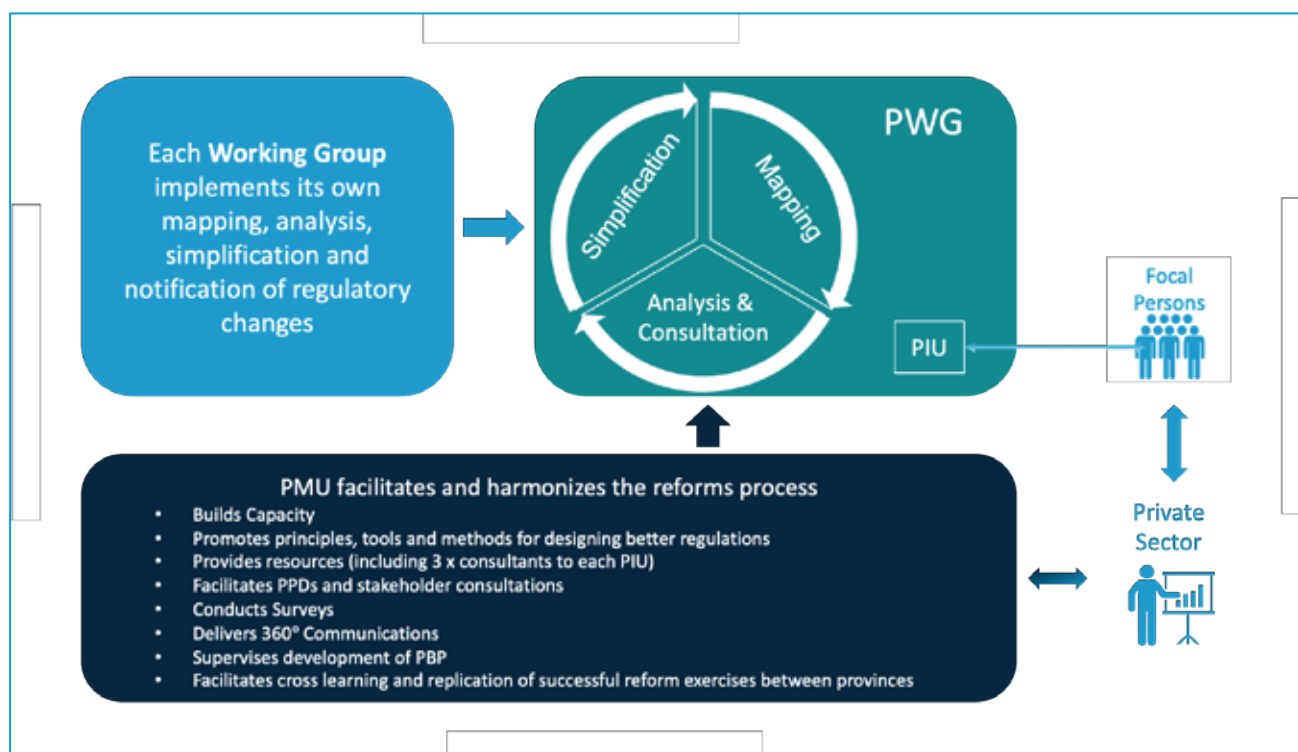
PRMI Strategy and Implementation has analysed global best practises in organising working groups of similar nature, leveraging a study of the World Bank Group's experiences of organising for reforms in Malaysia, Russia, and Turkey (see Table-3). In general, the roles of working groups in these countries involves:

- identifying constraints
- deliberating and discussing these constraints with emphasis on improvements
- developing reform recommendations
- providing oversight of the reforms process within their jurisdictions

Table-3: Comparison of the roles of different reform structures

	Working Groups	High-Level Oversight	Coordinating Unit
Malaysia	• Identification of key constraints • Clarify responsibilities and timelines • Identify solutions and response formulation • Day to day oversight • Reform implementation support • Collect stakeholders' feedback	• Prioritization of reforms • Monitoring of results • Unblocking implementation with the prime minister	Malaysia Productivity Corporation • Coordination of reforms • Reform implementation support • Escalating implementation support
Russia	Agency for Strategy Initiatives • Identification of key constraints • Identify solutions and response formulation • Day to day oversight • Reform implementation support • Collect stakeholder feedback	• Prioritization of reforms • Clarify responsibilities and timelines • Monitoring results • Unblocking implementation with president	Ministry of Economic Development • Prioritization of reforms • Identify solutions/response formulation • Escalating implementation issues
Turkey	• Identification of key constraints • Identify solutions/response formulation • Reform implementation support • Escalating implementation issues	• Prioritization of reforms • Clarify responsibilities and timelines • Monitoring results • Collect stakeholder feedback • Unblocking implementation with the prime minister	YOIKK Secretariat • Day to day oversight • Coordination of reforms • Monitoring of results

Source: World Bank Group, "Organizing for Reform – Global Experiences"

As each province will be leading the drive to modernise its regulatory procedures at the provincial level, these working groups will form the apex body for recommending changes in the existing and future business authorisations. To assist the provincial working groups with the reforms process, each will have its own provincial PIU (see Figure-5 below).

Figure-5: Setting up PRMI
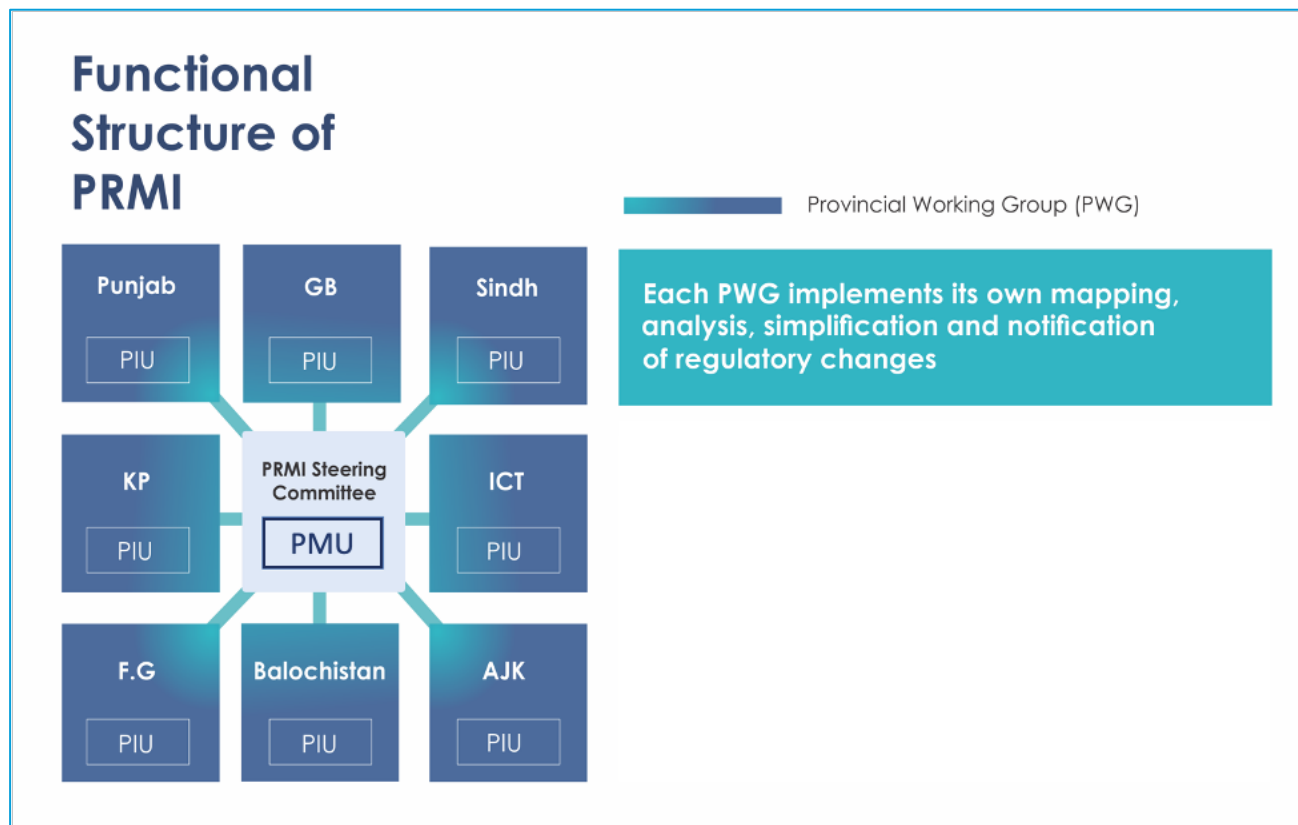
2.1.2 PROJECT MANAGEMENT UNIT (BOI)

A PMU at BOI will be the pivotal institution to drive PRMI. Among its responsibilities of supervising the PRMI implementation with its provincial counterparts, PMU will build capacities to undertake reforms and fulfil all training and facilitation needs of PRMI.

Additionally, it will work with its provincial counterparts to generate standard reports to BOI each month on KPIs and M&E indicators. A quarterly report will be prepared and reviewed at the quarterly steering committee meetings. Also, a monthly newsletter will be issued by BOI and circulated within all departments. The provincial working groups will forward updates and progress by the 7th of every month. The PMU will compile these and disseminate them widely by the 15th of each month.

2.1.3 FOCAL PERSONS

An essential aspect of PRMI's implementation would be the focal persons' appointment (preferably with 8-15 years of experience in public service) within each stakeholder agency. The steering committee will request the provincial governments to retain these focal persons within their respective departments for at least two to three years to play their roles of reform catalysts within their departments and accelerate the stocktaking and regulatory mapping exercise. Besides, through capacity building and training initiatives supervised by the PMU, the focal persons' appointment will help identify and drive the reforms process from the grassroots level.

The benefits of appointing focal persons include:

▪ overcoming departmental red tape and breaking down information silos

- understanding the inner working of agencies and their processes
- fast-tracking the mapping and problem definition processes
- understanding what it will take to bring about reforms
- providing easy access to subject matter experts

The steering committee shall decide to appoint focal persons within each regulating department (provincial, federal, and local), ideally with a supporting decision to compensate and incentivise their involvement considering the model followed by Pakistan Single Window.

2.1.4 BUSINESS EXPERT GROUPS

Business associations, councils, and chambers will nominate representatives to sector-specific business expert groups. These groups will help power one side of the PPD, presenting the private sector's reform needs. As will be explained below within capacity building, the nominated members will go through day-long training/workshops on regulatory reforms, the impact of regulations, and the differences between policies, rules, and administrative actions. Additionally, the training sessions would help promote a deeper understanding of regulators' minds as they fulfil their public protection and safety duty. In the future, business expert groups would be encouraged to disseminate learnings from these training sessions within their sectors by improving mechanisms of self-regulation and improving their internal compliance systems using a risk-based approach.

2.1.5 IT WORKING GROUP

An IT working group with representation from BOI, NITB, MoITT, private sector, and relevant IT stakeholders will advise and supervise PBP development.

2.1.6 DIALOGUE WITH STAKEHOLDERS

The success of PRMI and how far it progresses will rest on structured and productive PPDs between the business community and federal and provincial regulators. The business expert groups will support the process. PMU will moderate these sessions, designed in a way that each will be outcome-driven and result-oriented. Through PPDs, the PRMI will identify regulatory constraints facing Pakistan's private sector and design reforms that are proportional and based on a risk framework.

2.1.7 CAPACITY BUILDING

BOI will ensure that the provincial and federal regulators involved in PRMI have received adequate training in regulatory science and developed a comprehensive background in regulatory affairs and reform through interactive workshops, online, and face-to-face courses. BOI will train approximately 200 government officers (including the appointed focal persons) from relevant provincial and federal government departments. The PRMI will also design and implement onboarding activities for new focal persons within the government agencies.

The proposed pieces of training are divided into basic and advanced categories. The basic version will include an introduction to PRMI and EoDB using case studies from Lahore, Karachi and the Pakistan Single Window Initiative introduced by Pakistan Customs. The advanced version will dive deeper into designing regulatory reforms, impact assessment, and process re-engineering. Competitions will support these activities to identify and recognise top reforms.

In parallel, the PMU will work closely with civil service academies to design and deliver online and in-person tutelage on business regulations to new, mid-career, and senior officials. It will ensure that public servants have the knowledge and practise of designing and delivering better regulations.

The capacity-building efforts will also provide training opportunities to private sector stakeholders, including appointed members of the business expert group. By involving all stakeholders, PRMI will help bridge the gaps between the regulator and the regulated.

2.1.8 Awareness Workshops and Conferences

To build consensus among diverse stakeholders, capacity building measures introduced for PRMI will be supported by awareness workshops and conferences conducted nationwide to:

- introduce PRMI to the broad community: citizens and private, public, and civil sector entities

- broadcast the initiative and bring it into the national and global news

- allow free-flowing interactions and networking opportunities between the PRMI team and all the stakeholders, including the general public

- shape the PRMI image and public opinion in support of the initiative

Furthermore, an annual PRMI summit is proposed as an offline process for reflection. This summit will bring together all stakeholders to take stock of implementation progress, learn from advancements in regulatory discourse and technologies, and share local and international experiences of similar nature and scope.

2.2 Communicating PRMI

One of the PMU's critical functions will be to develop and implement a robust and effective communications plan through close coordination with provincial working groups and PIUs. The team will make use of the following digital platforms, keeping in view the stakeholders and the nature of communication needs:

- **Facebook –** A public Facebook group with all stakeholders and focal persons added. The PMU's social media manager will moderate the group and post information and updates about PRMI, webinars, interviews, and minutes of steering committee meetings. Additionally, it will be used as a platform to engage all members in dialogue on business reforms. All members will be asked to invite others from within their networks to the group.

- **LinkedIn –** The BOI's LinkedIn page will be used to share PRMI updates and invite interested members to the Facebook group.

- **Twitter –** The BOI and the steering committee's ranking members will use the platform to update the public on PRMI and invite them to the Facebook group. They will be requested to tweet with the 'PRMI' hashtag, or any other unique handle decided by the PMU social media team.

- **YouTube –** The BOI's YouTube channel will host a PRMI-specific playlist and play repeat telecasts of webinars and interviews.

- **Webinars –** The PMU social media team will organize frequent webinars to engage national and international stakeholders and the general public. They will serve as a two-way dialogue to inform and gather feedback on the kind of reforms likely to increase private sector activity, particularly exports and foreign investment inflows.

- **Newsletters –** Provincial working groups and their respective PIUs will forward progress updates to the PMU by the 7th of every month. BOI will compile and facilitate dissemination (both electronically and physically) to all stakeholders by the 15th of the same month.

3 IMPLEMENTING THE PRMI

The PRMI will be implemented incrementally in a sequence (see Figure-5) of two phases to help ensure the reform milestones are achieved meaningfully and on time.

3.1 PHASE 1: STOCKTAKING, MAPPING, AND THE FIRST ROUND OF ELIMINATION

The first phase will be based on legal provisions included in the Regulatory Guillotine laws. These will be adopted by federal and provincial legislatures and will define the scope of the review process, the schedule, guidelines for regulators, and the deadline for submitting RLCOs and eliminating the rest. The PMU will collaborate with provincial PIUs and working groups to design and implement the regulatory guillotine within their respective jurisdictions (if they choose to utilise the guillotine approach). A criterion for reduction and elimination (see Box-4 for what the particular standards for elimination may look like) will be developed by BOI and approved by the steering committee and all working groups.

> **Box-4: Criteria for guillotining RLCOs**
>
> The steering committee will decide the final criteria governing the removal of RLCOs following a collaborative approach that takes all stakeholders into account. Such a standard for removal of RLCOs would follow a guillotine approach, focusing on three critical questions (with constituent examples) for each RLCO:
>
> - Is it legal?
>   - Is the regulatory instrument backed by a legal provision, notified rules or bylaws?
> - Is it justified?
>   - Is it focused on reducing a risk posed by a business activity to the public, environment, or national security?
>   - Is it possible to measure and monitor the requirements and conditions and enforce them?
> - Is it business-friendly?
>   - Does it follow convoluted and opaque processes?
>   - Do compliance processes take a lot of time? Or a high cost?
>   - Do fees go beyond the cost of administration for the regulator?
>   - Outdated or do not comply with modern requirements?
>   - Based on manual processes?

Regulators and public agencies will be required to justify their regulatory instruments and provide rationale whether they should be **eliminated, revised,** or **retained**. The respective PIUs will act as guillotine units for their jurisdictions during this phase. They create regulatory databases adhering to the three defined categories for RLCOs based on whether they are to be eliminated, revised, or retained. All RLCOs falling in the 'eliminate' category and those not forwarded to the respective PIU by designated guillotine deadline will become defunct. Through a parliamentary process (see Figure-6), the federal and provincial legislatures will ratify the changes.

Figure-6: Pakistan Regulatory Modernisation Initiative (Phase 1)
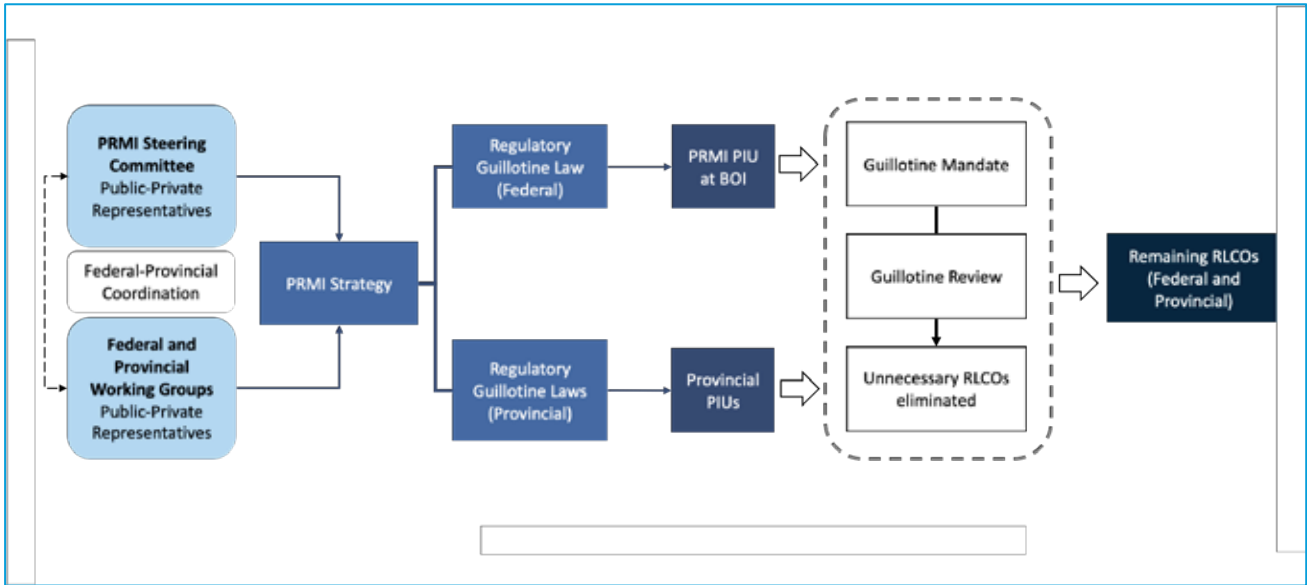
The proposed timeline for activities undertaken in first phase of PRMI are presented in Figure-7.

Figure-7: Proposed Timelines for Phase 1 of PRMI[4]

The remaining stock of RLCOs will proceed to the second phase of PRMI for a comprehensive review followed by simplification, process re-engineering and automation.

It is essential to underscore that in parallel to the activities specific to the guillotine approach, the conventional review of RLCOs – consisting of regulatory evaluations and consultations with stakeholders – will still take place. BOI will work closely with the private sector and the federal working group to identify, analyse, and recommend reform areas to the steering committee. Similarly, some provinces may not undertake a guillotine

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[4] Subject to timely provision of human and financial resources.

exercise based on the progress they have made to identify and take stock of RLCOs within their jurisdictions. Resultantly, it will be advisable for the provinces to start implementing Phase 2 activities.

3.2 PHASE 2: REVIEW, THE SECOND ROUND OF ELIMINATION, AND SIMPLIFICATION OF REGULATORY COMPLIANCE

The second phase of PRMI's implementation will develop tools and legal and institutional frameworks for improving regulatory quality and service delivery. It will also include a coordinated effort by the PMU and provincial PIUs to streamline RLCOs categorised for revision and retention during the guillotine process adopted in Phase 1 of PRMI's implementation. These RLCOs will undergo comprehensive ex-post evaluations and a **second** round of guillotine within their respective jurisdictions. The simplification and re-engineering process for remaining RLCOs will leverage private sector views gathered through the working groups or stakeholder consultations.

The review of both legacy and new RLCOs will leverage RIA methodology wherever possible. When time constraints do not allow for a comprehensive RIA of existing RLCOs, an ex-post evaluation will be conducted by adopting partial RIAs previously done in OECD countries.[5] Box-5 presents guidelines to serve as an example for undertaking partial RIAs for the ex-post evaluation of regulations:

Box-5: Guidelines for undertaking an ex-post evaluation of regulations using partial RIAs

Following guidelines can be adopted to ensure that each RLCO is analysed, and its social, economic, and environmental impacts identified:

- Set up clear evaluation rules and indicators at the very beginning.
- Design the evaluation process and delineate the division of responsibilities.
- Develop an efficient reporting mechanism to get in-depth information about implementation successes and failures.
- Ensure allocation of sufficient means to design and conduct the evaluation.
- Ensure the effective use of evaluation results to inform future decisions.

While adhering to these guidelines, it is essential to account for:

- cost-efficiency issues (costs/benefits analysis of the implementation of the governing law of RLCO under consideration)
- effectiveness (does the regulation achieve its objective)
- relevance in present time and circumstances
- legal inconsistencies
- cases of non-compliance
- desirable effects resulting from the implementation of the legal provisions

The PRMI's implementation team can use this information about the underlying causes/concerns regarding each RLCO to determine the most appropriate means to improve the legal framework.

Once re-engineered, the RLCOs will be digitalised and added to their respective portals before being integrated with the Pakistan Business Portal (see Figure-8). In parallel, the steering committee (together with the federal and provincial working groups) will create NRDO and a Pakistan Business Portal Company. The PRMI secretariat at BOI will transfer its responsibilities and knowledge for designing and implementing regulatory reforms to NRDO, which will have the representation of the federation, provinces, territories, and the private sector.

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[5] See OECD (2014) Framework for Regulatory Policy Evaluation. This publication provides countries with a Framework for Regulatory Policy Evaluation, an overview of OECD countries' evaluation practises, and concrete examples. It also reports key findings of three expert papers on the evaluation of regulatory policy that informed the development of the framework.

Figure 8: Pakistan Regulatory Modernisation Initiative (Phase 2)
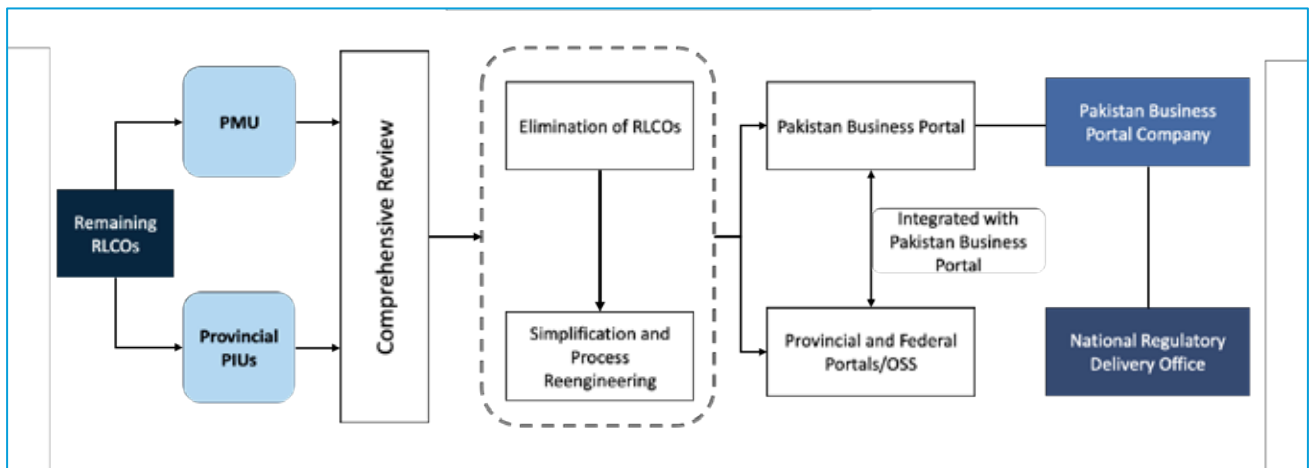
3.3 REFORMING RLCOS

The first phase of PRMI will focus on eliminating all RLCOs that fail the guidelines provided for the guillotine and described previously. The remaining RLCOs—those marked for retention or revision—will provide the basis to formulate recommendations for legislative, regulatory, and procedural changes, as appropriate to the issue under consideration. Depending on the instrument under review, the reform and simplification process will take tailored approaches suited to it. Consultations with the private sector will help check whether the proposed changes are likely to effectively remove regulatory bottlenecks.

The quality of the reform process (see Figure-9) will rely on the level of details gathered following Phase 1. The initial analysis will be reviewed by both the regulators and private sector stakeholders through structured sector specific PPDs and provide an impetus for simplifying, eliminating, and streamlining the remaining regulatory authorisations thereby paving the way for automation and integration into the PBP.

Figure-9: Stepwise reform process proposed for PRMI (Phase 2)

Figure-9: Stepwise reform process proposed for PRMI (Phase 2)

PRMI's reform process will be applicable for reviewing and reforming all types of RLCOs (including business licences. Box-6 highlights what business licences are and why their administration needs a regulatory transformation).

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Box-6: Reforming business licences

Businesses across the world require prior approval of government authority for establishing or conducting specific activities. While the word "licence" is used in common parlance to describe various procedures, these usually focus on *the authorisations or permissions firms must obtain for their core business activities.* Licencing is related to but distinct from processes such as business registration, permitting, and inspections.

Licencing regulations are typically established for the control of:

- activities with potential risks to human safety and wellbeing, including environmental protection
- activities that deal with limited resources
- activities that involve undesirable, although legal practises

Businesses might face unnecessary compliance burdens related to licences that are not justified, as they do not fulfil necessary or legitimate functions or are inefficient instruments. Unjustified licences are most frequently established to:

1. Obtain information on businesses, like the number of employees, assets, capital investments, types of activities, and their locations. Business registration, tax reporting, and statistical studies based on small samples of businesses are more efficient instruments for this objective.
2. Collect revenues through licence fees. This fiscal function is best fulfilled through a typical tax collection regime.
3. Establish eligibility for business assistance programmes or other benefits.
4. Protect markets or businesses from competition.
5. Exercise state oversight.

Eliminating unjustified licences does not increase risks and can provide immediate benefits in savings to businesses and governments. Licencing reform eliminates unjustified licences or the change to lower burden instruments (like explicit declarations of information). Licencing reform also focuses on removing or adjusting licence application requirements and permanent rules for business activities (business conditions), which might not be justified.

</div>

For instance, improving NOCs is an excellent case to illustrate the process because NOCs are time- consuming, opaque, and costly to obtain. They also exhibit a lack of inter-departmental and inter-regulator coordination and collaboration to process these complex requirements. An application for a business licence or registration is often required to be supported by several NOCs from various federal and provincial departments. For example, logistics companies will often need their business licences to be approved following NOCs from the Ministry of Interior, multiple law enforcement agencies, and the Anti-Narcotics Force (among others). Other countries do not widely use these NOCs. Reforming the NOC system in Pakistan would require a systematic approach (see Table-4).

Stepwise Approach to Reforming NOCs

	Step	Description
⬡	Step-1: Mandate	The BOI is mandated to reform NOCs as one of the RLCO under PRMI. The BOI undertakes the NOC reform activities in collaboration with Federal and Provincial Working Groups.
⬢	Step-2: Stock take	Stock take all federal, provincial and local NOCs for each sector. Classify NOCs into critical and non-critical by evaluating them using a risk-based framework for eliminating nonessential NOCs by their respective departments.
⊘	Step-3: Validate	Publish and disseminate these sectoral NOCs for validation with regulators and private sector including through crowdsourcing.
⚲	Step-4: Analysis	Check the legal justification of the NOCs and whether these requirements duplicate and overlap with existing registration and licenses.
👍👎	Step-5: Review	Organize structured consultations with regulators and the private sector to explore alternative options in place of NOC requirements.
⊛	Step-6: Eliminate	Explore eliminating NOCs that do not have robust legal justifications and duplicate existing registrations and licenses.
⚲	Step-7: Analysis	Identify NOCs that are of essential nature having clear legal justification especially in term of impact considerations
🏷	Step-8: Cost	Explore options for reducing cost of dealing with essential NOCs overtime with binding targets
👍👎	Step-9: Review	Organize structured consultations with regulators and the private sector to define clear justifications for essential NOCs and approach to reducing the related cost of compliance in a targeted manner. Explore accepting self-certification instead of nonessential NOCs at the time of filing and moving to a system of risk-based compliance monitoring.
⌁	Step-10: Streamline	Improve the process, and the legal framework if necessary, for obtaining NOCs applying, build capacity of regulators to effectively and efficiently administer NOC applications after changes and ensure the private sector is aware of the new requirements. Develop an inter-departmental process so that applications with NOC pre-requirements can be communicated to all concerned agencies to allow them to register an objection. Replace inspections associated with NOCs with third-party inspections.
⚙	Step-10: Automate	Digitalize the reform process for obtaining the essential NOCs for integration into the PB
🏛	Step-11: Gatekeeping	Use RIA tools to ensure the flow of new NOCs is checked and their positive and negative impacts are well understood and documented before making these requirements effective

Besides dealing with NOCs, businesses need to apply for various permits that national or local government agencies give concerning defined objects. A sound permitting system entails (see Box-7):

- timely approval so that businesses don't absorb non-revenue days during the wait for the approval
- providing a transparent service delivery in terms of inspections and processes associated with the permit
- providing a one-stop-shop solution to allow businesses to apply for all permits in one location

> **Box-7: Construction permits**
>
> Construction permits regulate compliance with urban/land planning and building code requirements. International experience shows that enforcement of these aspects is problematic, and there are widespread opportunities for discretion and corruption, which lead to large numbers of substandard and informal buildings.
>
> Global good practise in construction permit reforms focuses on three aspects:
>
> - The introduction of private sector solutions at different stages of project development: a review of plans; issuance of permits; site inspections; issuance of code compliance certificates.
>
> - A focus on risk levels, as the primary driver of supervision and inspections. In most cases, reforms have focused on establishing one set of simple procedures for low-risk buildings. At the same time, reforms have worked on improving risk-categorisation, moving away from just the number of square meters to multi-variable models to define risk categories.
>
> - Use of information technologies to automate the processes and B2G interaction and building information modelling technologies for processing filings.

3.4 REFORMING BUSINESS INSPECTIONS

The approval of some RLCOs includes inspections before businesses start operating (ex-ante) as requirements. Enforcement of conditions to maintain some RLCOs is also conducted through inspections after businesses start operations (ex-post), which are frequently unscheduled. Examinations occur at all government tiers and with the participation of several inspectorates and regulatory agencies that regulate specific areas.

When inspections have a high level of unpredictability (both on scheduling and content) or overlap in any way between participating agencies, they might pose a critical burden. Businesses face a loss in productivity (and costs associated with any "unofficial" payments or gifts to the inspectors that most likely go unrecorded), and the governments bear additional costs associated with extra staffing of inspectors (see Box-8).

> **Box-8: Inspection costs**
>
> The material and financial costs associated with inspections are hard to quantify. The non-transparent nature in which they usually occur—the interaction between an inspecting official and the business—is not usually recorded or accompanied by tools to transcript the exchange. Nevertheless, the burden on businesses due to regulatory inspections can broadly be defined as:
>
> - costs directly or indirectly related to testing or physical inspection conducted as part of the broader inspection system
> - turnover, profit, or value-added losses due to checks (during the examination itself or as a result of the inspector's decision)
> - monetary (or other) sanctions imposed as a result of inspection findings
> - costs of putting the business in compliance following the inspection's findings and the inspector's improvement notice
>
> *Source: Blanc, F. (2012). Inspection reforms: why, how, and with what results (OECD)*

International good practise on business regulation shows that improving business inspections contributes to the following outcomes:

- increased compliance with government regulations
- reduced uncertainty for businesses
- increased transparency and integrity management
- lower costs for businesses and regulatory agencies

In reforming business inspection systems, the following five areas are identified for improvements:

1. Providing information to investors and the business community regarding the inspections' nature and objectives, including the provision of checklists and information on the underlying regulations and their interpretation.
2. The use of digital tools for user-friendly and predictable scheduling of planned inspections, coordinating local and federal reviews if possible (see Box-9).
3. The introduction of a risk-based approach for targeting unplanned inspections, integrating, as far as possible, the inspection requirements of all relevant regulatory agencies at each level of government.
4. The penalties and sanctions associated with the regulation to make them wholly transparent and commensurate to the potential risks involved (see Figure-10).
5. The possibility of delegating inspections to accredited private sector companies.

Figure-10: Risk-centric inspections

Even though business inspections might create high burdens on businesses, it will never be possible to eliminate or substitute checks. It is the primary tool for compliance supervision of requirements to obtain or conditions to maintain a license or other business regulations. The above reforms will lead to a system of inspections focused mostly on high-risk activities and businesses. It will collect information and use feedback loops and artificial intelligence technologies to build a "smart" regulation system. It will also create opportunities for inspections by private-sector inspectors with proper delegation and accreditation and capable of leveraging information on compliance and risks through technology use.

3.5 SUMMARY OF THE PRMI REFORM PROCESS

The main steps involved in achieving the desired outcomes will be as follows (illustrated in Figure-11):

▪ **PRMI Strategy:** The PRMI's steering committee and the provincial governments approve the PRMI strategy, which is essential for mobilising the implementation teams at the federal and provincial levels for a comprehensive and fast-tracked reforms process. CCI's endorsement adds credibility to the initiative and enactment of legal framework for regulatory guillotine by respective federal and provincial legislatures.

▪ **Regulatory Design:** The PRMI secretariat will develop training modules on regulatory design in light of global best practices. The training on regulatory design (including principles of good regulations, RIAs, best modes of compliance, inspection and enforcement) will be imparted to stakeholders in both the private and public sector.

▪ **Capacity Building and Human Resource Mobilisation:** The federal and provincial PRMI working groups are notified, and those for NCC on SMEs merged into the PRMI working groups (wherever possible). The PIUs are assigned an additional role of working as regulatory guillotine units for the first phase of PRMI and focal persons appointed within all provincial and federal regulatory agencies for coordination of reforms. The capacities of all stakeholders (including those from the private sector) involved are built with the help of BOI and PRMI secretariat.

▪ **Legal Framework:** The federal and participating provincial governments each pass a legal act for their respective jurisdictions detailing the process, institutional arrangement, and schedule for the review and elimination of unnecessary RLCOs. Later, a regulators' guidelines (PRG) would also be notified. The draft regulators guidelines (PRG), institutional, legal and operational model would be endorsed by the PRMI's steering committee and approved by the federal and provincial governments. On the institutional side, an NRDO is established towards the end of second phase to undertake consistent regulatory reforms, improve regulatory quality through RIAs and prevent redundant regulations from creeping back in.

▪ **Cataloguing and Reviewing RLCOs:** The PMU, federal and provincial working groups (supported by their PIUs and input from the private sector) undertake a review of the RLCOs within their jurisdictions, determining which to eliminate, revise, and retain.

- **Elimination:** RLCOs failing the review by being placed in either the 'eliminate' category or those that aren't communicated are made defunct under the legal acts and its provincial variants. Those remaining go through a second, more extensive review and elimination round.

- **Consultations with Stakeholders:** The BOI, in collaboration with the federal and provincial working groups and business expert groups, will organise PPDs to provide inputs to the review of the remaining RLCOs.

- **Legal Database and Automated Compliance:** The BOI, in collaboration with the federal and provincial working groups, consolidates the remaining RLCOs into a singular database following which their processes are simplified and re-engineered before their entry to PBP. Besides serving as a VOSS, PBP also duals as the sole legal database of regulations for compliance purposes.

- **Establishing NRDO and a PBP Management Entity:** The BOI, in collaboration with the federal and provincial working groups and business expert groups, develops an institutional, legal, and operational model. The PRMI's steering committee and the provincial governments endorse it. It is approved by the federal government to establish NRDO as an autonomous and constitutionally established federal institution for regulatory oversight and quality assurance. Additionally, the PBP management entity will be established to maintain and update the PBP on a sustainable basis. Options for institutional settings are summarised in Box-10.

Figure-11: Sequencing Pakistan Regulatory Modernisation Initiative
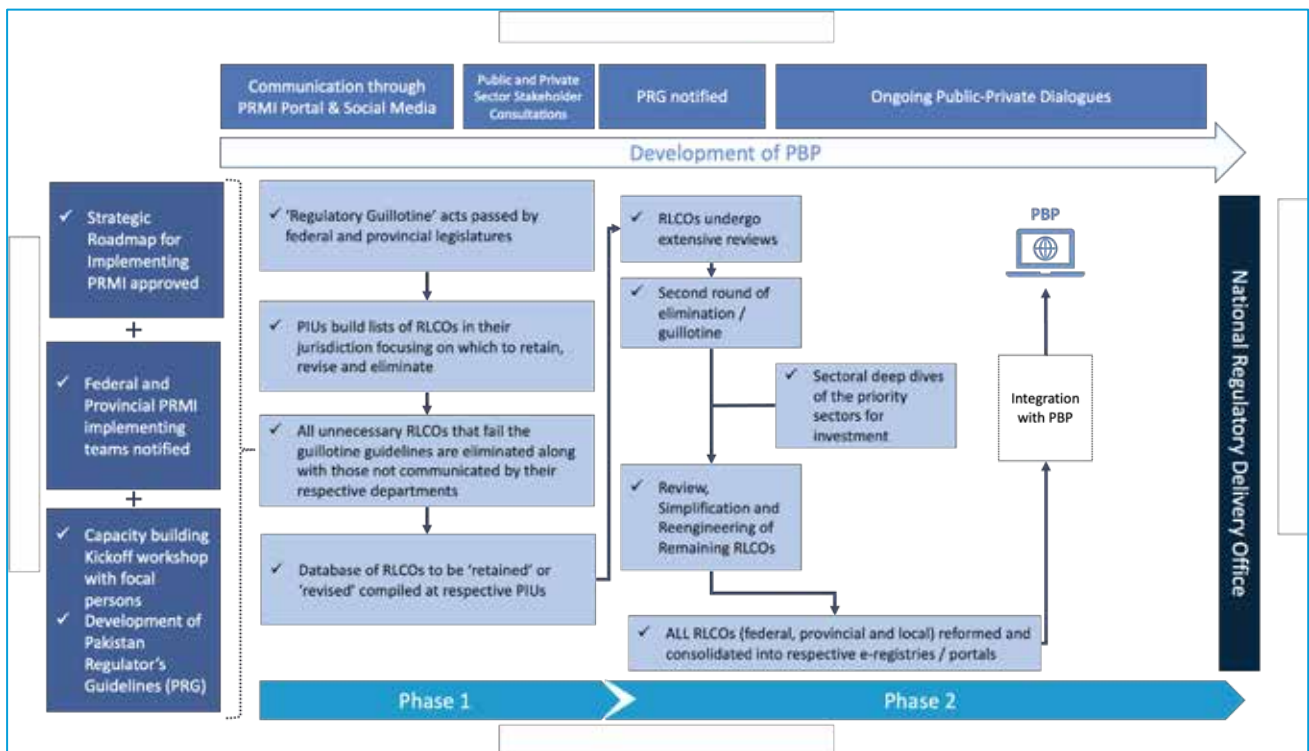
Box-10: Options for the institutional setting of PBP Management Entity

The sustainability of the PRMI requires setting up an entity that would administer and continue the development of the PBP one-stop-shop (OSS) online platform, providing all services needed for the administration of an electronic forum.

Organisational and institutional setting for this PBP Management Entity could follow several different options (Annexure D contains detailed references) for organisation and funding. Options in the public sector could be two-fold:

- A ministry or an attached agency leads the overall e-government initiatives in Pakistan. The same is the case, for instance, in Sri Lanka, where the Information and Technology Agency manages the OSS Nenasalas. In Chile, the General Secretariat of the Presidency's Unit of Modernisation and e-Government manages the OSS ChileAtiende. In Mexico, the federal government, under the National Digital Strategy, administers OSS TuEmpresa.
- An independent new agency should report to either BOI or the Prime Minister's Office. The same is the case, for instance, in Denmark, where national and municipal governments jointly administer Municipal Job Centres. Similarly, in Germany, the OSS Informations portal Arbeitgeber is a joint operation involving several institutions under a steering committee. The OSS Altinn in Norway also follows this approach. In Canada, the National BizPal Office manages OSS BizPal.

The use of various managed service models, such as e-government public-private partnerships (PPPs) and cloud hosting, or different service sub-contracting schemes, has developed over the last two decades a range of options for the involvement of private sector operators:

- Concessions contract for operations and maintenance: In Kenya, OSS e-Citizen is managed through an outsourcing agreement with a local ICT firm.
- Management contracts with specified service levels: In Portugal, the Administrative Modernisation Agency under a concession agreement runs OSS ePortugal.
- Public-private partnership (PPP) for design, build, develop, operate, and transfer of OSS infrastructure and services: This approach is being used in some states in the USA (Maryland, Virginia, others), extensively in Singapore, and in some countries in Africa (Rwanda's OSS Irembo, for example).

International experience for OSS's organisational structure across the world indicates no single best practice to consider. Most OECD countries lean more towards public sector entities. Several less developed countries have leveraged different options for public-private partnerships or service contracts with private sector operators.

Deciding on a financial sustainability model for covering operational expenses and future improvements should form the starting point of discussions related to PBP Management Entity structure.

3.6 PAKISTAN BUSINESS PORTAL

Pakistan Business Portal will serve as the legal database of RLCOs in effect and a virtual one-stop-shop (VOSS) for all information related to business regulation and procedures. Once reformed and streamlined, regulatory processes will find their way here, thereby saving both the regulators and businesses' time-filling compliance requirements. Since PBP will also serve as the legal database of RLCOs for compliance purposes, any regulatory instrument not found there would be defunct. Apart from a detailed listing of all business regulations and procedures, the PBP would be an interactive, user-friendly platform serving several types of users – existing businesses, new entrepreneurs, foreign investors, regulators, and policymakers. With PRMI's commitment to automation and digitisation in regulatory service delivery, the PBP will allow users to apply, renew, and pay for RLCOs online. All provincial and federal departments that regulate business activities will be facilitated with solutions and tools for online administration of RLCOs, integrating the PBP with their existing platforms where possible (see Figure-12).

Figure-12: Pakistan Business Portal
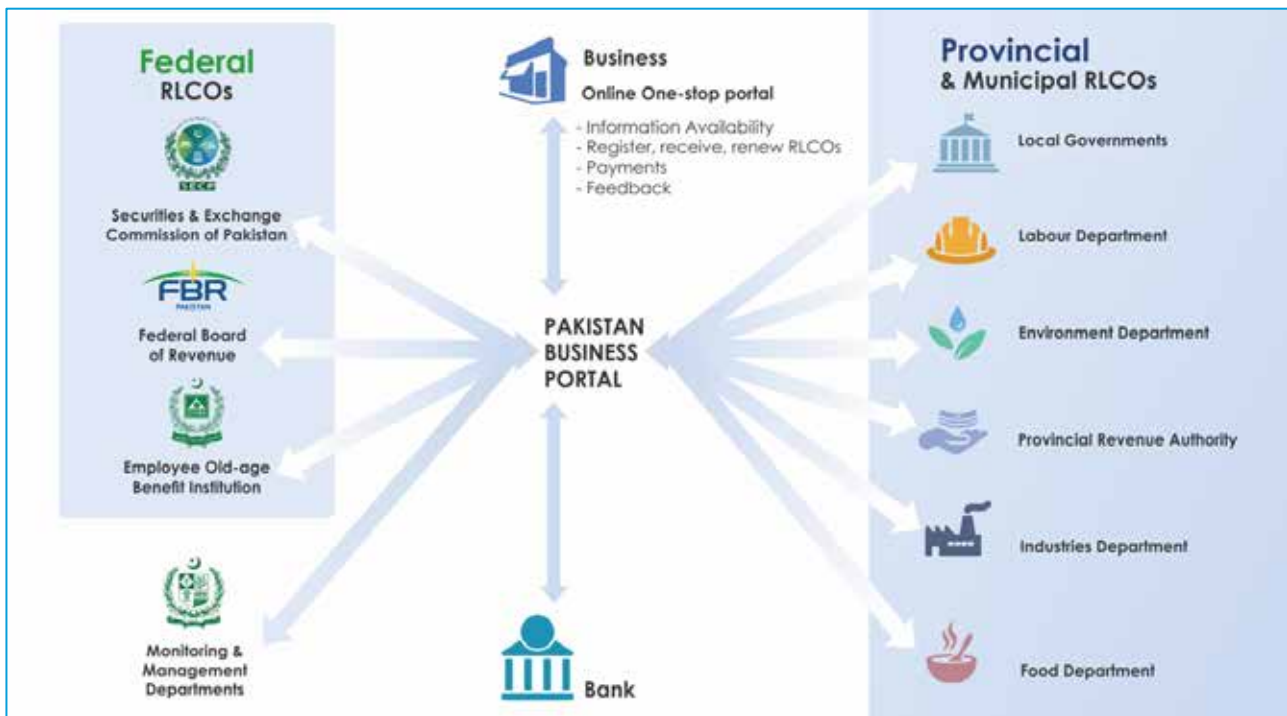
While the objective of PBP is to serve as a VOSS, with a set of features and design model proposed later in this section, it is vital to understand the key results PBP aims to achieve:

1. Remove organisational siloes and improve inter-departmental and government to business communications.
2. Reduce the time and effort spent on compliance fulfilment by businesses.
3. Reduce the regulatory paperwork and labour-intensive, repetitive tasks, helping regulators process them quickly, efficiently, and without going over budget.
4. Allow a mechanism for addressing businesses' grievances more effectively and 'crowdsource' future reforms by utilising the platform to collect feedback from all and any business owner online, using AI-driven tools to assimilate public response and comments into the rulemaking process (see Box-11).

The PBP's development process would actively engage representatives of both the private and public sectors, the PRMI's steering committee, provincial working groups, and business expert groups.

The PBP will take a 'one business, one registration number' approach, which will significantly eliminate the duplicity of collecting information when filing separate applications. Similarly, frequently needed documents such as the computerised national identity card (CNIC), incorporation certificate from the Securities and Exchange Commission of Pakistan (SECP), national tax number (NTN)/sales tax registration number (STRN) would be confidentially maintained for each business entity for use at the time of filing for or renewing an RLCO. Figure-13 below summarises the intended benefits to both the regulators and businesses.

Figure-13: Potential benefits of PBP to businesses and regulators

Regulators

* reduce their administrative costs because of automated transactional processes
* improve inter-agency and intra-agency coordination
* increase compliance transparency
* minimise duplicate information filing

* be notified of new laws and regulations
* interact with regulators and get faster responses
* save certificates and documents in their online repositories

Businesses

Online Application & Administration of RLCOs

The PBP's integrated digital payment solution will be linked to an escrow for financial disbursements to each regulatory agency in proportion to their regulatory instruments.

NITB will lead the development of PBP in lines with the requirements put forth by BOI. The PMU will prepare a detailed software requirement specification (SRS) document and share it with the steering committee, working groups, and the business expert groups. The final SRS document will describe what the PBP will do and how it will function (see Figure-14 for the proposed logic model).

Figure-14: Proposed logic model of Pakistan Business Portal
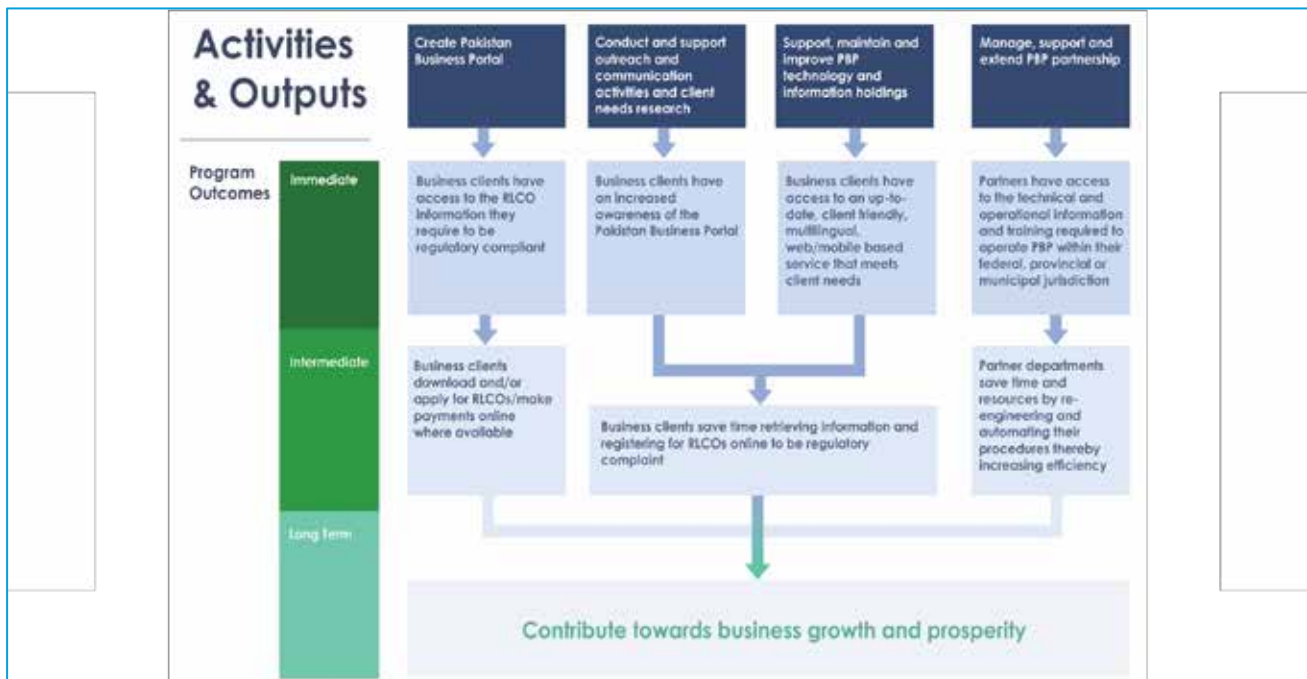
It is essential that PBP consistently improves over the years. As newer and innovative technologies become available, the PBP Management Company's annual review exercise will ensure the platform stays up to date. The annual exercise will gauge the platform's performance and introduce tools to further increase the operational efficiency and regulatory delivery.

4 INSTITUTIONALISING THE PRMI

4.1 ESTABLISHING AN NRDO

To ensure the reform process continues, the capacity built by PMU at BOI and the leadership provided through the steering committee and provincial working groups will need a stable and long-term organisational setup. Therefore, a permanent and dedicated regulatory oversight agency – a National Regulatory Delivery Office (NRDO) – will be established through an act of parliament. The provinces will adopt the legal framework of NRDO to reinforce their respective regulatory reform initiatives (see Figure-15). The NRDO will offer stability over the coming years (and beyond) towards the deployment of lasting changes, from simplifying the current regulatory landscape to gatekeeping the introduction of new regulations.

The establishment of a regulatory oversight body is a popular practise among OECD member states. Over a third of them have set up such institutions (often with a degree of independence from their respective governments) to ensure acceptable regulatory practises. The location of NRDO within the state apparatus posits an important challenge involving significant trade-offs. While the decision will rest with the steering committee for NRDO's organisational and locational setting, the PMU will facilitate the process through a series of consultations with public and private sector stakeholders utilising the PPD platform. The Steering Committee on PRMI will need to address elements of institutional design which include:

- the agreed mandate of the NRDO
- the extent of autonomy and regulatory oversight
- preservation of credibility and cross-sector, cross-government-levels mandate
- provincial and federal representation
- inclusion of private sector-experts

Figure-15: Establishment of a National Regulatory Delivery Office
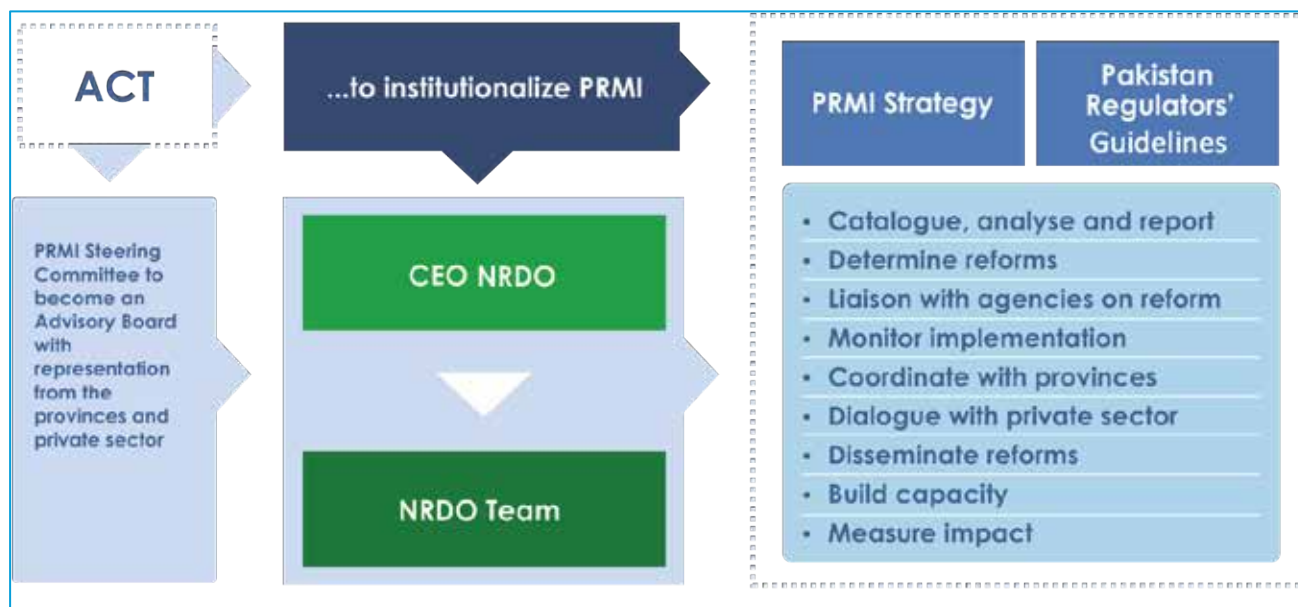
The NRDO will take the leading role in improving the ease of investing and doing business in Pakistan for domestic and foreign investors, principally by accelerating regulatory reforms (see Box-12). It will be a permanent fixture within the structure of the GoP for improving business regulations and procedures for compliance. Such an institutionalised arrangement will enhance Pakistan's overall investment climate significantly.

Box-12: Role and responsibilities of the NRDO

The NRDO will be the coordinating point within GoP for all initiatives to improve the country's business operating conditions and the broad investment climate. In this context, it will, among other things, initiate in consultation with relevant agencies:

- Studies relating to regulatory challenges to guide the reform process.
- Data collection and other actions to determine where policy, legal, regulatory, procedural, administrative, and cost impediments to greater levels of both local and foreign private investment exist within the country.
- Regulatory and procedural reforms needed for offering 'investor-friendly' business regulation in Pakistan.
- Impact assessments of the existing regulations.
- Ensure the flow of new regulations undergoes RIA and principles of better business rules.
- Business regulation frameworks to operate within special economic zones and industrial estates.
- Mechanisms for consultation with stakeholders from the public and private sectors regarding problems with existing regulatory arrangements. One such tool may be an online feedback mechanism, allowing NRDO to directly access private sector inputs on regulatory issues on an ongoing basis.
- Studies to address investment climate constraints to women entrepreneurs.
- Monitor the progress of the implementation of reforms agreed with the federal and provincial governments.
- Reports on changes to the regulatory arrangements in the country in real-time.
- Annual investment climate performance reports to the federal and provincial governments.
- Initiatives relating to investment climate reforms within provinces to ensure that regulatory changes are harmonised across Pakistan and maximise these efforts' benefits.
- Smart regulation workshops and capacity building of relevant federal and provincial officials in collaboration with civil service academies and the academia.
- Alignment of Pakistan's regulatory landscape with the ones in place globally and the countries it trades with, thereby allowing better integration of firms within the global value chains.
- Compliance with international regulations, standards, norms, and make it easier for businesses to operate globally.

4.2 DEVELOPING THE LEGAL FRAMEWORKS FOR PRMI

Successful execution of PRMI will require three legal frameworks to be developed and enacted through respective federal and provincial legislatures.[6] These include a law mandating the regulatory guillotine, a framework enacting PRG and another law establishing the NRDO and a PBP management entity:

- **Regulatory Guillotine Law** will adequately establish the mandate of the regulatory guillotine, its scope, schedule, and associated procedures. It will:
  o include instructions for all regulatory agencies and public institutions to communicate the RLCOs they administer to their respective working groups
  o provide guidelines for the classification of RLCOs into whether they should be retained, simplified, or eliminated
  o develop a process for grievance redressal and appeals
  o define qualifications to prevent the eliminated RLCOs from being brought back

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[6] The information provided in this section does not constitute legal advice. Instead, all information presented here serves as general guidelines.

- **Pakistan Regulator's Guidelines (PRG)** will define principles to be adopted by all regulating agencies for critically evaluating existing and future regulations. This principle-based framework will help regulators to empathise with businesses and reform the regulatory environment into one that is conducive to economic growth.
- **NRDO Act** will establish a sustainable process of regulatory quality control through institutionalisation and provide legal precedence to creating an NRDO and a PBP management entity. NRDO will become the apex body to filter the flow of regulations for undertaking periodic reviews of the regulatory environment and carry out RIAs and ex-post evaluations of RLCOs. Consequently, it will ensure an agile approach to regulatory modernisation and the iterative improvements to the regulatory environment that continue beyond the PRMI timeline.

4.3 CONCLUSION

PRMI Strategy and Implementation discusses relevant best practices for carrying out a comprehensive transformation of the regulatory landscape at the national and subnational level in Pakistan. Evidence-based regulatory policy reviews and design are gaining importance worldwide. They are critical to the economic growth of emerging economies like Pakistan. Regulatory homogeneity and improved regulatory quality and delivery at national and subnational levels in Pakistan will be critical to its integration within the global value chains, improve trade, and rejuvenate homegrown entrepreneurship.

This document will remain a live one, and orient itself (through periodic revisions) to experiences and lessons learnt as PRMI progresses. Furthermore, it is imperative to understand that the recommendations, tools, and techniques presented here have stimulated productivity and economic growth in the countries where they have been applied. Hence, it will be essential that the PRMI is implemented timely by all national and subnational stakeholders to pitch Pakistan as an attractive destination for doing business. From the highest level, political support will be critical for its implementation. Its absence may yield one-time regulatory reductions that are easily reversed.

5 TIMELINES

Activity	To Be Completed By	Status	Responsibility	Resource Allocation
The draft strategy and implementation plan presented	October 2020	Completed	BOI	BOI + TA
Provincial, territorial, and regional PRMI teams (working groups and PIUs) notified	February 2021		Provincial government/regional administrations	Existing resources
Feedback reviewed and incorporated – updated strategy and implementation plan created	February 2021		BOI	BOI + TA (from WBG)
Central Regulatory Guillotine Unit established	March 2021		BOI	Existing Resources
IT working group notified	April 2021		BOI + NITB	Existing resources
100 cumbersome procedures affecting SMEs identified	April 2021	In Progress	SMEDA + Private Sector	SMEDA
Final strategy document launched	May 2021		BOI	BOI + TA
Awareness workshops (x 08)	May 2021		BOI	BOI
Guidelines for the regulatory guillotine	May 2021		BOI	Government funding + TA
Development of training materials for regulatory guillotine exercise	May 2021		BOI	BOI
Legal framework for a regulatory guillotine (federal RG law/ordinance)	June 2021		BOI + Law Division	Government funding
Capacity building workshops of stakeholders and focal persons (200-300 public servants) focused on regulatory	June 2021		BOI	Government funding

Activity	To Be Completed By	Status	Responsibility	Resource Allocation
guillotine and registry creation				
Central e-registry notified	June 2021		BOI	Government funding + TA
Draft PRG created and circulated	July 2021		BOI	Existing resources + TA
PMU notification	August 2021		Secretary BOI	Existing resources
Final PRG adopted by FG	August 2021		BOI + respective federal government departments	N/A
PMU recruitments	August 2021		BOI	Government funding + TA
8 x capacity building workshops of stakeholders and focal persons focused on regulatory review and analysis	August 2021		PMU	Government funding
PRG adopted by all participating governments	September 2021		All PIUs	Existing resources
The first tranche of RLCOs to be eliminated recommended to the FG (PRMI Phase 1)	October 2021		All PIUs + PMU	Project funding
PRMI Phase 2 activities (iterative analysis and recommendations of the working groups for regulatory simplification)	October 2021 onwards (monthly)		BOI + respective working groups	Project funding
HR procurement for technical support of PIUs (for two years)	October 2021		PMU	Project funding
Situation analysis and IT infrastructure readiness exercise	October 2021		NITB	Project funding

Activity	To Be Completed By	Status	Responsibility	Resource Allocation
IT readiness (situation analysis) report shared with the steering committee, working groups, and business expert groups	December 2021		NITB	Existing resources
Procurement of firm for PBP development	December 2021		NITB	Project funding
PBP prototype reviewed by working groups and business expert groups	October 2022		PMU + NITB	Existing resources
PBP-Lite launched	December 2022		NITB+PMU	Existing resources
PBP company established	March 2023		PMU+NITB	Government funding
NRDO established	June 2023		PMU	Government funding

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GLOSSARY

- **18th Amendment:** The parliament unanimously passed the 18th Constitutional Amendment and notified in the Gazette of Pakistan on April 20, 2010. This Amendment introduced a paradigm shift from a heavily centralised to a predominantly decentralised federation.

- **Crowdsourcing:** (Merriam Webster) The practise of obtaining needed services, ideas, or content by soliciting contributions from a large group of people and especially from the online community rather than from traditional employees or suppliers.

- **Regulatory Mapping:** Refers to end-to-end mapping of regulatory processes including the time and costs taken at each stage of the process.

- **EoDB:** The Ease of Doing Business Rank (EODB) measures an economy's position to the best regulatory practises. Though World Bank used to publish the 'Doing Business' reports from 2003, the ranking of economies started only from 2006.

- **Key Performance Indicators (KPIs):** Key performance indicators (KPIs) are the critical (key) indicators of progress toward an intended result. KPIs provide a focus for strategic and operational improvement, create an analytical basis for decision-making, and focus on what matters most.

- **Regulatory Guillotine:** The guillotine is an orderly, systematic, transparent, rapid, and low-cost means of counting and then rapidly reviewing a large number of regulations against clear scientific criteria for good regulation and eliminating those that are no longer needed. It results in economically significant regulatory cost reductions for businesses, either on a government-wide scale or targeted at specific problem areas such as licences or sectors. Extensive stakeholder participation helps to ensure that the reviews are realistic and factual.

- **Regulatory Impact Assessments:** A regulatory impact assessment (RIA) is a document created before a new government regulation is introduced. Regulatory impact assessment (RIA) provides crucial information to decisionmakers on whether and how to regulate to achieve public policy goals. RIA examines the impacts and consequences of a range of alternative options. RIA also helps policymakers defend a decision not to intervene in markets where the costs of doing so outweigh the benefits. For more information, see: http://www.oecd.org/gov/regulatory-policy/regulatory-impact-assessment-7a9638cb-en.htm.

- **Regulatory Sandboxes:** The regulatory sandbox allows regulators to test innovative regulatory features and processes with real businesses in a controlled environment to try and gauge the impact before rolling it out nationally.

- **RegTech:** RegTech is the management of regulatory processes through technology. The main functions of RegTech include regulatory monitoring, reporting, and compliance.

- **Repositories:** An online storage space where documents, media and other digital information forms is stroed to access whenever needed.

- **Standard Costing Model**: The standard cost model (SCM) is a method for determining the administrative burdens for businesses imposed by regulation. It is a quantitative methodology that can be applied in all countries and at different levels. The method can measure a single law, selected areas of legislation, or perform a baseline measurement of all legislation in a country. Furthermore, the SCM is also suitable for measuring simplification proposals and the administrative consequences of a new legislative proposal.

- **Virtual One-Stop-Shop (VOSS):** VOSS is a business model that offers a wide variety of services in a single online (virtualised) location.

- **Regulatory Stocktaking:** Process of collecting and maintaining a repository of all existing regulatory instruments using a standard template for data collection.

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