



**IGF**

INTERGOVERNMENTAL FORUM  
on Mining, Minerals, Metals and  
Sustainable Development

# Permitting for Critical Minerals

A government toolkit for efficient and  
responsible mine development



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### **Permitting for Critical Minerals: A government toolkit for efficient and responsible mine development**

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## **DISCLAIMERS**

Use of examples and case studies does not endorse a jurisdiction's approach.

The examples and case studies in this document present actual legislation and diverse experiences of stakeholders in permitting in a wide range of jurisdictions. Presentation of legislation from a particular jurisdiction does not indicate endorsement of that jurisdiction's legislation or how it has been implemented or failed to be implemented in particular projects. However, it is useful to compare the various approaches around the world and to easily access actual language, tools, or mechanisms from legislation on a particular key topic. Likewise, presenting a case study from a particular jurisdiction does not indicate that the jurisdiction is managing all aspects of its mineral sector optimally. There is room for improvement in all jurisdictions; this report provides opportunities to learn across different jurisdictions from different types of mining projects.

## **UNOFFICIAL TRANSLATIONS OF LEGAL TEXTS**

The translations of laws and policies referenced and presented in this document are, in most cases, unofficial translations.

## **THIS REPORT IS NOT A SUBSTITUTE FOR LEGAL ADVICE**

While this report provides a range of factors and options to consider, this report is not a substitute for legal advice.

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## Preface

The accelerating global energy transition requires an unprecedented volume of mineral resources. However, in the short term, the supply of some critical minerals is unlikely to meet demand, for several reasons. Existing supply chains for these minerals are fraught with challenges, including geopolitical tensions, social and environmental concerns, slow permitting processes, and the long lead times required to develop new mining projects, among others.

Without immediate actions to address supply constraints, there is a significant risk of delaying the energy transition, with implications for achieving global climate targets. Short-term solutions, such as improving the efficiency of permitting processes, diversifying supply sources, enhancing material efficiency, and recycling existing materials, are crucial for bridging the gap between current supplies and future demands. These measures can provide a buffer while longer-term mining projects and sustainable extraction technologies are developed, ensuring a steady and responsible flow of critical minerals to support the global shift to a low-carbon economy.

The permitting process in mining can be lengthy due to several necessary technical requirements needed to ensure sound environmental and social conditions, as well as unnecessary administrative challenges, such as cumbersome procedures, a lack of coordination across governmental agencies, and a lack of transparency and consistency in decision making. Delays can be exacerbated by the lack of sufficient stakeholder engagement to address potential environmental and social concerns. These issues can significantly increase the costs of mining projects, deter investment, create uncertainty for all stakeholders, and slow down supplies of critical minerals.

A number of activities currently exist that seek to improve permitting efficiency within the framework of regulations. In addition, a wide range of non-regulatory barriers also need to be tackled but are overlooked. This report aims to help improve the efficiency of permitting processes across various government agencies and authorities responsible for mining, environmental, and social issues, at both the national and subnational levels. Interministerial committees and ad hoc task forces have the potential to enhance these efficiencies, without compromising natural and social environments and while staying within the frame of existing regulations.

Specifically, this report identifies bottlenecks and opportunities to improve permitting processes. The work included conducting desktop case study reviews and in-country consultations to identify administrative, regulatory, and technical bottlenecks in the current permitting process for copper, lithium, and nickel. The review covers issues relevant to small, medium-sized, and large-scale mining and focuses on selected jurisdictions in the Americas, Africa, Australia, and the Asia-Pacific region across copper, lithium, and nickel.

The objective was to analyze and compare permit delivery processes across different countries. The case studies and consultations were used to develop recommendations to improve permitting processes, where possible, while ensuring that environmental and social assessment aspects of the permitting process receive adequate time and respect the highest standards.



## Executive Summary

Permitting for mining projects faces challenges worldwide. With the need for critical minerals to support the world's energy transition, there is a need to streamline and speed up the permitting process required to take a mining project into construction and production. How can governments streamline permitting while still meeting their mandates to protect the environment and human health in their countries? This document aims to provide tools for governments to answer that question.

A review of case studies in North and South America, Australia, Asia, and Africa revealed a wide breadth of reasons for delays, as well as strategies being implemented to reduce permitting timelines. Permitting for mining, in the context of this document, refers to the approval of a mining project resulting from an environmental and social impact assessment, as well as any other permits, licences, approvals, and authorizations for the mine to begin construction (e.g., permits for water use, effluent discharge, air emissions, land use, timber harvest, etc.).

From the analysis, the following key characteristics define an efficient permitting process:

- well-coordinated and consistent
- a single, clearly designated lead agency
- sufficient government capacity and resources
- predictable and transparent process and timelines
- follows a risk-based approach
- appropriate level of required detail for the approval
- standard conditions that allow for project-specific flexibility
- addresses community concerns and develops community consent
- protective of the environment and communities
- clear performance accountability.

A suite of tools is provided in the form of “Do and Don’t” lists to assist governments with streamlining permitting. Tools are divided into three categories:

- internal process tools that look inward for planning, coordinating, resourcing and auditing;
- regulatory framework tools to define timelines and processes that are risk-based and streamlined; and
- external process tools that look outward to meet the needs of proponents and communities.

Governments can analyze their mine-permitting system and choose the tools that are more relevant to their challenges, goals, and available resources.

The drive to develop mines to support the energy transition can be seen as a daunting task, or it can be seen as an opportunity to make government processes more efficient and effective, likely with unforeseen benefits in the future.



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## Acronyms

|             |                                                                                 |
|-------------|---------------------------------------------------------------------------------|
| <b>AI</b>   | artificial intelligence                                                         |
| <b>DRC</b>  | Democratic Republic of the Congo                                                |
| <b>EPA</b>  | Environmental Protection Agency                                                 |
| <b>ESIA</b> | environmental and social impact assessment                                      |
| <b>IEA</b>  | International Energy Agency                                                     |
| <b>IGF</b>  | Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development |
| <b>ToR</b>  | Terms of Reference                                                              |



# Glossary

|                                                          |                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Artificial intelligence (AI)</b>                      | In the context of this document, AI refers to machine learning or similar tools that are used to help complete administrative tasks.                                                                                                                                                      |
| <b>Digitalization</b>                                    | Digitalization converts analog information into digital form and improves processes.                                                                                                                                                                                                      |
| <b>Environmental and social impact assessment (ESIA)</b> | ESIA refers to the overall process for assessing and deciding whether to approve development of a project.                                                                                                                                                                                |
| <b>Permit</b>                                            | A permit refers to a written or oral authorization to do something. It is a certificate or document evidencing permission (USLegal.com, 2026).                                                                                                                                            |
| <b>Permitting process</b>                                | In the context of this document, the permitting process pertains to the ESIA process for overall project approval and acquisition of key permits required to begin development (e.g., water use, land use, effluent discharge, air emissions, community agreements, heritage protection). |
| <b>Unitary state</b>                                     | A state in which authority is centralized in the national government and subnational administrations exercise only delegated powers, in contrast to a federal system.                                                                                                                     |



# 1.0 Introduction

## 1.1 The Importance of Effective Permitting

Critical minerals are vital for various key sectors to support renewable energy, clean technology, and our transition to a more sustainable, low-carbon future. Examples include copper, cobalt, gallium, lithium, nickel, platinum, vanadium, and rare earth elements essential for electric vehicle batteries, solar panels, wind turbines and electricity networks. Importantly, criticality is context-specific (what is critical for one country may not be for another) and should be assessed in line with national development, industrial, and sustainability priorities (Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development [IGF], 2022).

To meet national needs for critical minerals, governments are creating mandates and policies to develop critical minerals quickly. Permitting has been identified by governments and industry as a significant hurdle that must be addressed to support a timely supply of critical minerals while still protecting the environment and communities. Other aspects under government control that also need to be addressed include legal certainty, well-designed fiscal and tax regimes, and transparent access to mining concessions. Designing tax regimes to attract investment without eroding revenue is itself a substantial task; governments can draw on the IGF's guidance on mining taxation and incentives developed for this purpose.<sup>1</sup>

Policies that prioritize critical mineral development create both the impetus and opportunity to reform and improve permitting processes. As nations race to secure supplies of minerals essential to the energy transition, governments are recognizing that outdated and lengthy permitting procedures can significantly delay project timelines and hinder energy transition goals. Streamlining these processes is increasingly seen as a strategic imperative (International Energy Agency [IEA], 2022). However, this streamlining must not leave behind the environmental and social wins of the past decade in the mining sector.

Aligning permitting reform with critical mineral policy can enhance investment certainty, reduce bureaucratic hurdles, and ensure faster deployment of clean energy infrastructure. But

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<sup>1</sup> See: IGF Global Mining Tax Initiative: <https://www.igfmining.org/financial-benefits/global-mining-tax-initiative/>, and the IGF Mining Tax Incentives Database: <https://www.igfmining.org/resource/igf-mining-tax-incentives-database/>



permitting must not only be faster; it should be effective. Permitting for critical mineral mining projects should be completed within a reasonable, predictable, and economically feasible timeline while also providing robust environmental and social protections.

This report aims to help governments in setting goals for an effective, well-implemented mine permitting framework that supports the timely development of critical mineral projects. To further assist in analyzing permitting frameworks, this report also identifies common bottlenecks and challenges that countries experience.

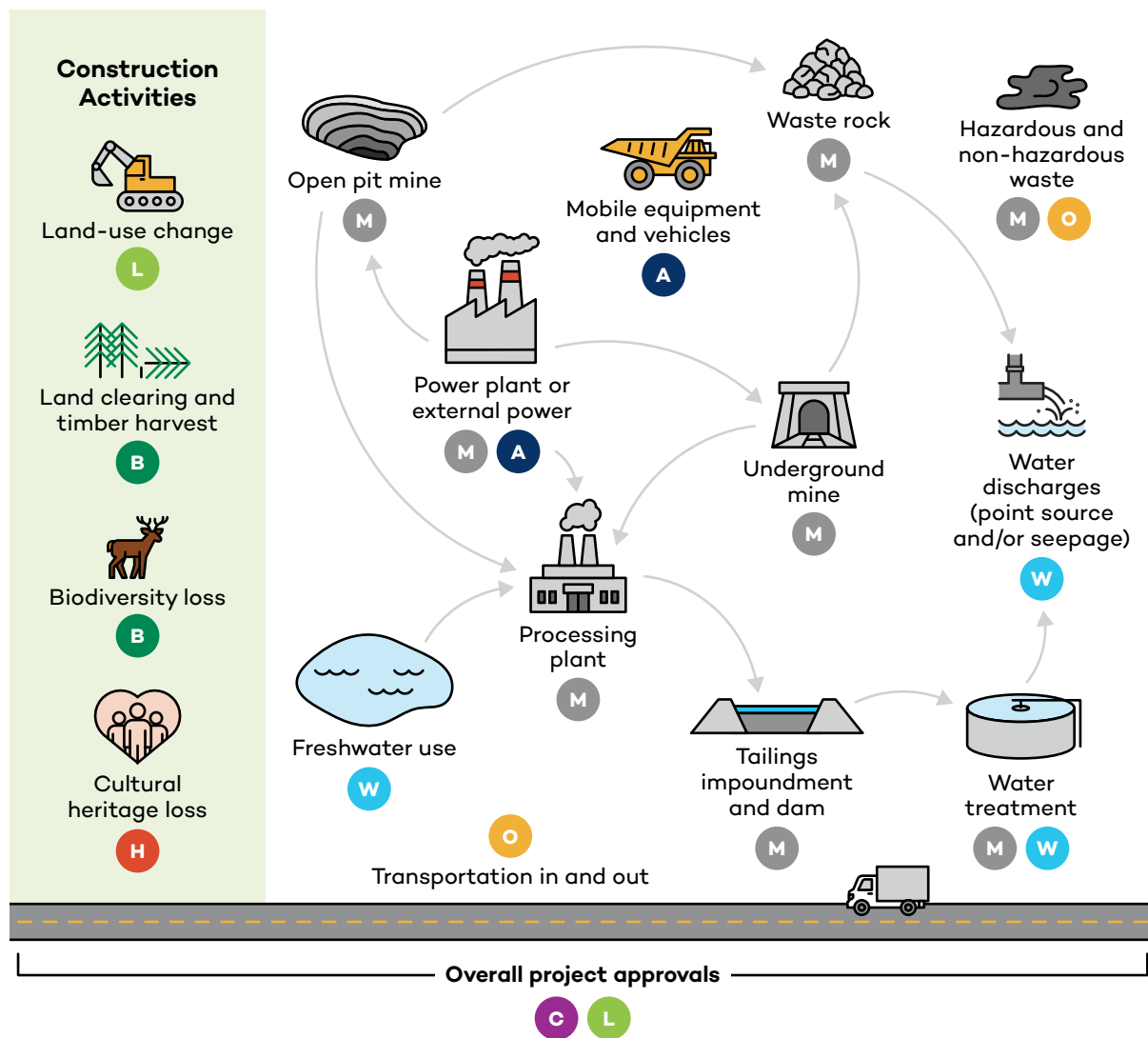
## **1.2 Organization of the Report**

The first section presents what effective permitting looks like and current challenges. The second section reviews and compares the permitting of critical mineral projects across the jurisdictions studied. The final section provides tools and insights for governments to improve the efficiency of their permitting frameworks.

## **1.3 Key Features of Effective and Efficient Permitting**

To determine what effective and efficient permitting looks like, we need to first define what permitting is. Permitting for mining, in the context of this document, refers to the approval of a mining project resulting from an environmental and social impact assessment, as well as any other permits, licences, approvals, and authorizations needed for the mine to begin construction. Note that permitting is also needed for exploration and to manage change throughout the life of a mine. This document focuses on the permitting required to begin mine construction, where timely approvals are essential to unlock critical minerals. Figure 1 illustrates the aspects of mine development that require permits.

**FIGURE 1.** Typical aspects of mine development requiring permits



### Type of Permit

|                        |                               |                                                                                         |
|------------------------|-------------------------------|-----------------------------------------------------------------------------------------|
| <b>M</b> Mine permits  | <b>A</b> Air permits          | <b>C</b> Community/societal approval (e.g., environmental and social impact assessment) |
| <b>L</b> Land permits  | <b>B</b> Biodiversity permits | <b>O</b> Other permits                                                                  |
| <b>W</b> Water permits | <b>H</b> Heritage permits     |                                                                                         |

Source: Authors.

There are different permitting instruments and mechanisms depending on whether the legal system is based on common law or civil law, and on the specifics of the jurisdiction. Despite these differences, there are common goals and characteristics of an effective and efficient permitting process, as presented below.



### 1.3.1 Coordination

**Well-coordinated and consistent:** Permitting usually incorporates national, regional, and local governments and many ministries administering mining and environmental components. All agencies should be coordinated so reviews and approvals are well aligned to avoid delays and duplication. It is also important that these agencies remain within their legal and technical mandate as, in practice, permitting delays can be the result of agencies introducing off-topic comments or conditions about matters beyond their competencies.

**A single, clearly designated lead agency:** All permitting should be coordinated from a single governmental agency that provides a clear, consolidated view of all the requirements for mine approvals. This supports certainty and government coordination. However, to be genuinely effective, this agency should ideally be embedded within a politically empowered cross-cutting entity (e.g., a Cabinet-level coordination unit) to ensure robust oversight, coordination, and conflict resolution.

### 1.3.2 Resources and Capacity

**Sufficient government capacity and resources:** Governments should provide sufficient financial and human resources to administer the approvals process and any changing legislation. Mining projects are technically complex; therefore, there should be sufficient technical capacity (through staffing or contracting) to review project proposals/applications and to prepare appropriate conditions of approval.

### 1.3.3 Regulatory Framework

**A predictable and transparent process:** The environmental and social impact assessment (ESIA) and permitting processes should be clearly defined and communicated to the company. Any variables should be defined at the start of the process and should not change throughout the approvals process for a project. Likewise, the objectives and guidelines (i.e., the goalposts) for approvals should not change for a project. It is anticipated that environmental, social, health, and safety standards may change over the life of the project, but these should be clearly communicated to companies and reasonable and adequate time allowed for changes to be made to meet new standards.

### 1.3.4 Timelines

**Predictable and transparent timelines:** Administrative timelines for ESIA and permitting should be defined in legislation and adhered to (e.g., review time, decision time, key milestones). Extensions should be limited and applied only within predefined time limits. Predictable timelines allow companies to plan for scheduling supplies and services and reduce risk for investors.

### 1.3.5 Scale and Risk

**Focused on risks:** The greatest risks and complexities of the proposed mine and activities should be identified and addressed early. Permitting time should focus on the areas where there are project-specific risks rather than wasting time on aspects that are inconsequential or can be managed by following standard good practice.



**Appropriate level of required detail for the approval:** The process and level of information required for each approval should be staged and consistent with the level of risk and objectives of each approval. For example, an environmental and socio-economic assessment likely needs a feasibility level of design to determine that the overall environmental and social impacts of a project are acceptable, whereas setting discharge limits in a permit likely needs detailed design.

**Standard conditions that allow for project-specific flexibility:** There is significant knowledge across the world on leading practices for avoiding and minimizing the harmful effects of mining on the environment and communities. Many approvals can therefore include a standard set of pre-written conditions based on good practices. These conditions should allow sufficient flexibility to account for project-specific variations and be adjusted to reflect the level of risk associated with the activity. Using standard conditions can speed up the permitting process.

## 1.3.6 Community Consent

**Addresses community concerns and develops community consent:** Approvals should have community support and Indigenous consent, if applicable. This is supported by transparent and participative processes, conditions to protect communities, and potentially community agreements with governments and/or corporations.

## 1.3.7 Protection of the Environment and Communities

**Protective of the environment and communities:** The overall objective of approvals and permitting is to determine whether the mine is acceptable and to ensure that conditions are in place to protect the environment and communities.

## 1.3.8 Accountability

**Clear performance accountability:** Government agencies are more likely to complete permitting and achieve strong government service performance when expectations are clearly defined, measurable, and supported by regular reporting and auditing.

# 1.4 Examples of Permitting Bottlenecks, Challenges, and Opportunities

Understanding and identifying permitting bottlenecks, challenges, and opportunities depends on the jurisdiction, location, commodity, type of mine, and the legal framework. Some common examples are outlined below.

## 1.4.1 Bottlenecks

**Government resources:** Government agencies involved in the permitting process are often underfunded, understaffed, and not incentivized to expedite approvals. The lack of support and risk of administrative or legal repercussions for errors create an environment of excessive caution, particularly in agencies with limited technical resources.

**Regulatory overlaps and inconsistencies:** Unclear lines of responsibility and inconsistent application of legislation across government bodies can create significant bottlenecks. For



example, ESIA legislation may exist at national and regional levels and must be harmonized so that only one ESIA is completed, with defined timelines for the project. Permitting processes also frequently lack clear distinctions between mine permits and environmental permits, so care must be taken to avoid duplicating conditions for requirements such as air emissions, water discharges, or waste management plans.

**Agency coordination:** When government agencies fail to understand each other's objectives and requirements, the permitting process can become disordered and inefficient. For example, one ministry may lead the ESIA process and engage other ministries to provide technical expertise. However, if those agencies are not sufficiently familiar with the objectives, scope, and timelines of the ESIA process, they may request information that is not material to decision making, duplicate reviews already conducted by other authorities, or provide comments that are inconsistent with the overall assessment process. This can result in delays, uncertainty, and additional costs for both governments and project proponents.

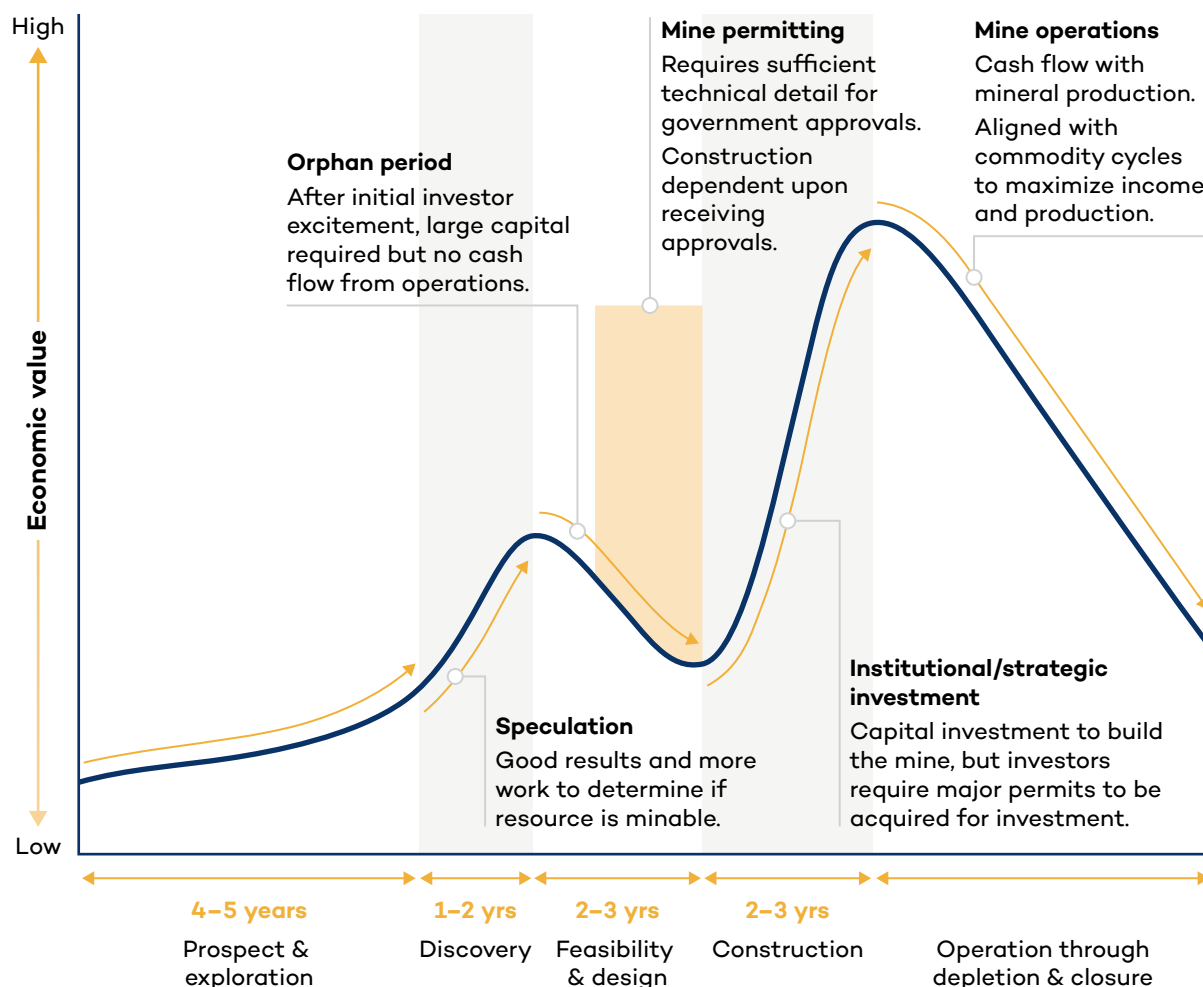
## 1.4.2 Challenges

**Timelines:** Governments tend to be driven by policy changes, whereas mining companies are driven by market cycles. This can create a misalignment. In many jurisdictions, mine permitting has become more complex and onerous, with increased but often necessary demands for human and environmental protection and controls. Permitting frameworks have tended to add administrative steps and/or new requirements over time, often without the drive to build supporting capacity and efficiencies. In addition, delays can be created through speculation, when mining companies are driven to acquire permits to increase value rather than developing detailed designs for mine development. Factors such as commodity price, social acceptability, technical complexities, and financing also influence development timelines. Therefore, permitting systems are often out of step with the mine development and market cycles.

Permitting of a new mine (including the ESIA approval and subsequent permitting) can take from 2 years to more than 10 years depending on the country and complexity of the project. Mineral prices, on the other hand, have typically had a cycle of 8 to 10 years between peaks. Mining project feasibilities are often developed on the upswing of the commodity price, and then a mine takes 2 to 3 years to construct (Figure 2). If the permitting takes too long, the mine approvals will not arrive until the commodity prices are decreasing again, at which point development financing may become more difficult.



**FIGURE 2.** Permitting and the mineral life cycle



Source: Adapted from the Lassonde Curve (*Mining Explained*, 2023).

**Transparency:** When companies do not clearly understand the permitting process and its requirements, they often end up reacting to ad hoc information requests, scrambling to gather and mobilize resources under compressed, last-minute timelines. This typically results in higher costs and delays while outstanding data is collected and engineering designs developed.

**Unclear requirements:** When the objectives of the approval process are undefined, poorly defined, or change over time (e.g., water quality objectives, waste management requirements), companies cannot determine what data to collect, what designs to develop, or what information to present. This results in frustration for all parties, higher costs, and schedule delays.

### 1.4.3 Opportunities

**Artificial intelligence (AI) assistance:** A review of permitting processes also provides an opportunity to consider new technologies that can address the challenges. One example is the Danish Environmental Protection Agency (EPA), which recently implemented an AI-assisted program to better coordinate agencies and create process efficiencies. The program took 8 months to implement and claims it has reduced permitting timelines by 50% for



renewable energy projects (cBrain, n.d.). The EPA implemented a system that maps out a clear process and has a central collaboration hub. A digitalized system allows companies to submit and track their project's process, automates the workflows, and coordinates agencies and engagement activities. AI is then used to help analyze case law and identify trends and patterns in project applications, enabling more consistent and efficient reviews (Knudsen & Søndergård-Gudmandsen, 2023). These changes demonstrate how technology can meaningfully streamline permitting.

## 1.5 Limitations of the Report

This report, while incorporating examples and input from technical experts and governments, does not detail all aspects of permitting. It is not a substitute for the informed, multidisciplinary expertise that is needed to address the unique characteristics of any local development project. Accordingly, this document presents good practices, examples, and tools instead of attempting to provide law or policy models. Governments will need to build a diverse team with the requisite skills to address issues in their unique circumstances.

This report comprises the results of the analysis of current legislation and regulatory frameworks related to permitting systems across 10 jurisdictions. Other sources reviewed include sector-specific publications, relevant good practice guidance, and other standards on technical issues related to permitting in the mining industry.

The report focuses mainly on land-based, large-scale mining, but also addresses artisanal, small-, and medium-scale mining when jurisdictions have differentiated or abbreviated processes. The report does not address deep-sea or riverine mining. It should also be recognized that permitting occurs throughout exploration and change must be managed during operations and closure, with some variations for brownfield projects.



## 2.0 Analysis of Case Studies

The permitting regimes in a range of jurisdictions were reviewed to understand the different legal frameworks governing mine development and associated permitting timeframes. The studies also examined the strategies that jurisdictions are adopting to improve permitting processes in response to the growing demand for critical minerals and national economic growth. The jurisdictions studied include

- Western Australia
- Ontario, Canada
- Peru
- Chile
- Jujuy, Argentina
- Philippines
- Indonesia
- Namibia
- Zambia
- Democratic Republic of the Congo (DRC)

Based on the case studies, efforts to improve the permitting process have mainly focused on predictability, accountability, and transparency. The issues that contribute to permitting delays, and the solutions to address them, vary across jurisdictions. Table 1 summarizes the challenges and solutions identified in the cases studied, with the solutions linked to the improvement tools presented in Section 3.


**TABLE 1.** Summary of issues and solutions from case studies

| Jurisdiction           | Challenges and bottlenecks |                        |                                   |           |                |                   |                                    |                | Government solutions (proposed and implemented) <sup>a</sup> |                        |            |                 |                      |                      |                          |                       |                    |                    |                       |                     |                        |                       |                   |                       |
|------------------------|----------------------------|------------------------|-----------------------------------|-----------|----------------|-------------------|------------------------------------|----------------|--------------------------------------------------------------|------------------------|------------|-----------------|----------------------|----------------------|--------------------------|-----------------------|--------------------|--------------------|-----------------------|---------------------|------------------------|-----------------------|-------------------|-----------------------|
|                        |                            |                        |                                   |           |                |                   |                                    |                | Internal processes                                           |                        |            |                 | Regulatory framework |                      |                          |                       |                    | External processes |                       |                     |                        |                       |                   |                       |
|                        | Coordination <sup>b</sup>  | Resources and capacity | Regulatory framework <sup>c</sup> | Timelines | Scale and risk | Community consent | Protects environment and community | Accountability | Analysis/strategic Plan                                      | Coordinating processes | Resourcing | Auditing/review | Defined timelines    | Standardized process | Standards and conditions | Risk-based permitting | Streamline/improve | Guidance           | Digital one-stop shop | Proponent screening | Avoid proponent delays | Early com. engagement | Land-use planning | Performance reporting |
| Western Australia      | ✓                          |                        | ✓                                 | ✓         | ✓              |                   |                                    |                |                                                              | ✓                      |            |                 | ✓                    |                      |                          |                       |                    |                    | ✓                     |                     |                        |                       |                   | ✓                     |
| Ontario, Canada        | ✓                          |                        | ✓                                 |           | ✓              | ✓                 |                                    |                |                                                              | ✓                      |            |                 |                      |                      |                          |                       |                    | ✓                  | ✓                     |                     |                        | ✓                     |                   |                       |
| Peru                   | ✓                          | ✓                      | ✓                                 | ✓         |                |                   |                                    | ✓              |                                                              | ✓                      |            |                 |                      |                      |                          |                       | ✓                  |                    | ✓                     |                     |                        |                       |                   | ✓                     |
| Chile                  | ✓                          |                        |                                   | ✓         |                |                   |                                    | ✓              |                                                              | ✓                      |            |                 |                      |                      |                          |                       | ✓                  |                    | ✓                     |                     |                        |                       |                   |                       |
| Jujuy, Argentina       |                            |                        | ✓                                 |           |                |                   | ✓                                  | ✓              |                                                              |                        |            |                 |                      |                      |                          |                       |                    |                    |                       |                     |                        |                       |                   |                       |
| Philippines            |                            | ✓                      |                                   | ✓         |                | ✓                 |                                    |                |                                                              | ✓                      |            |                 |                      |                      |                          |                       |                    |                    |                       |                     |                        |                       |                   |                       |
| Indonesia <sup>d</sup> |                            |                        |                                   | ✓         |                |                   |                                    | ✓              | ✓                                                            |                        |            |                 |                      |                      |                          |                       |                    |                    |                       |                     |                        |                       |                   |                       |
| Namibia                | ✓                          |                        | ✓                                 | ✓         |                |                   | ✓                                  | ✓              | ✓                                                            |                        |            |                 |                      |                      | ✓                        |                       | ✓                  |                    |                       |                     |                        |                       |                   | ✓                     |



| Jurisdiction | Challenges and bottlenecks |                        |                                   |           |                |                   |                                    | Government solutions (proposed and implemented) <sup>a</sup> |                         |                        |            |                      |                   |                      |                          |                       |                    |          |                       |                     |                        |                       |                   |                       |
|--------------|----------------------------|------------------------|-----------------------------------|-----------|----------------|-------------------|------------------------------------|--------------------------------------------------------------|-------------------------|------------------------|------------|----------------------|-------------------|----------------------|--------------------------|-----------------------|--------------------|----------|-----------------------|---------------------|------------------------|-----------------------|-------------------|-----------------------|
|              |                            |                        |                                   |           |                |                   |                                    | Internal processes                                           |                         |                        |            | Regulatory framework |                   |                      |                          | External processes    |                    |          |                       |                     |                        |                       |                   |                       |
|              | Coordination <sup>b</sup>  | Resources and capacity | Regulatory framework <sup>c</sup> | Timelines | Scale and risk | Community consent | Protects environment and community | Accountability                                               | Analysis/strategic Plan | Coordinating processes | Resourcing | Auditing/review      | Defined timelines | Standardized process | Standards and conditions | Risk-based permitting | Streamline/improve | Guidance | Digital one-stop shop | Proponent screening | Avoid proponent delays | Early com. engagement | Land-use planning | Performance reporting |
| Zambia       | ✓                          | ✓                      | ✓                                 | ✓         |                |                   |                                    | ✓                                                            |                         |                        | ✓          |                      |                   |                      |                          |                       | ✓                  |          | ✓                     |                     |                        |                       |                   | ✓                     |
| DRC          | ✓                          | ✓                      | ✓                                 | ✓         |                |                   |                                    |                                                              | ✓                       |                        |            |                      | ✓                 |                      |                          |                       |                    |          |                       |                     |                        |                       |                   |                       |

Source: Summary by authors.

Notes:

<sup>a</sup> Solutions listed are those identified through the case studies and are not indicative of all potential solutions.

<sup>b</sup> Includes challenges with duplication of process.

<sup>c</sup> Includes challenges with duplication and unclear legislation, plus gaps in legislation.

<sup>d</sup> Policy changes are a result of the change in political objectives of protecting the community and local economy rather than fast-tracking permitting.



## 2.1 Summary of Case Study Issues

Although the focus has been on unlocking permitting for critical minerals, there were a variety of reasons and objectives found in the case studies for improving a jurisdiction's permitting system. Objectives ranged from developing mines to be ready for a demand for critical minerals to managing a drop in market demand for a critical mineral because the jurisdiction is currently outcompeted in the market to protecting communities and the environment, keeping and promoting secondary production inside the country, or keeping benefits for local companies while simultaneously attracting foreign investment. Overall, the studies show that mine development is a lengthy process, as it requires a careful balance between advancing the technical work needed to secure funding for each stage of project development and managing the uncertainty and risk that the project may ultimately not proceed to production.

Upon reflection of the desktop reviews of case studies and stakeholder dialogues, the following presents insights that frame the permitting challenges across jurisdictions, highlighting institutional realities, governance risks, and reform opportunities.

### **Predictability matters as much as speed.**

Efforts to accelerate permitting timelines must not overlook the importance of predictability. Clear milestones, transparent procedures, and enforceable deadlines provide stability for investors and communities in complex regulatory settings. Uncertainty in timelines, sequencing, or authority erodes trust and heightens risks of litigation or delay. Uncertainty can be mitigated with publicly available guidance documents and/or an agency that leads a proponent through all permitting processes.

### **Critical minerals lack regulatory alignment.**

Despite global momentum on critical minerals, no country in the cases studied has a comprehensive permitting framework dedicated to critical minerals as a class. This gap shows a disconnect between international priorities and national permitting, which still treats them as ordinary commodities. Closing this gap is key for countries aiming to be reliable partners in the energy transition. That said, if permitting process improvements are made systemically, the improvements will be beneficial, independent of whatever market demand changes occur. In addition, although there may be a predicted increase in demand for critical minerals, the actual market for critical minerals for any one jurisdiction is also affected by competition, supply, and political factors such as protectionism.

### **Unrealistic legal deadlines lead to non-compliance.**

Across jurisdictions, legal deadlines for permits are often missed, as they rarely reflect agency capacity or review complexity. Credibility requires realistic, defined timelines aligned with institutional capabilities. This increases predictability, improves resource allocation, and ensures more transparent communication with applicants and stakeholders.

### **Unitary states have structural advantages.**

Unitary systems with standardized permitting enjoy greater consistency, traceability, and control. Federal or decentralized systems face fragmented procedures, uneven implementation, and overlapping jurisdictions. While decentralization has merits, effective reform demands stronger coordination to ensure coherence and accountability.



### **Political discretion undermines regulatory integrity.**

When political actors influence permit approvals, it erodes technical foundations, fuels uncertainty and delays, and risks politicization that weakens trust. Credibility requires depoliticizing decisions, clarifying hierarchies, and reinforcing technical agencies. However, it is seen that political prioritization is required to get resources and to prompt legislative reform. Permitting systems that prioritize projects were most effective if clear and transparent criteria were used, such as demonstrated investment commitments, technological innovation, and alignment with national development goals.

### **Permitting systems are the product of reactive layering.**

Many permitting frameworks stem from decades of reactive layering, with new permits and agencies added without integration. In most jurisdictions, overlapping regulations and competences result from the gradual rise of environmental law alongside sectoral mining rules, often without coordination. The result is overlap, duplication, and regulatory incoherence. Reform must streamline competencies, consolidate functions, and align systems with current governance needs.

### **Data sharing and interagency coordination need strengthening.**

The need for agile information-sharing mechanisms among permitting agencies remains a persistent challenge. In many cases, companies are required to resubmit identical data to multiple entities, causing delays and frustration. Enhancing interoperability and data traceability is essential to reduce duplication and foster trust across institutions.

### **Modernization requires more than digital portals.**

Digitalization alone is insufficient, with many jurisdictions implementing an online portal for accepting permit applications without the necessary mechanisms needed to realize improvements. Governments must also modernize institutional practices by automating routine tasks, potentially applying AI for administrative tasks and data analysis, and integrating digital tools with broader procedural reforms. Otherwise, digital platforms risk merely replicating existing inefficiencies.

### **Community engagement needs clearer boundaries and protocols.**

Stakeholders have called for standardized procedures for community consultations, with clearly defined roles for government, companies, and communities. Most jurisdictions leave community engagement entirely to project proponents; however, community requirements cannot necessarily be fulfilled by proponents, especially where community consent is required or benefits need to come from government revenue sharing. Governments must assume a convening role rather than leaving engagement entirely to project sponsors and must ensure that community demands are reasonable, sustainable, and consistent with the permitting process.

### **Institutional roles must be clarified.**

The review revealed persistent confusion regarding agency mandates, particularly in multi-agency and multi-level permitting systems. Clearly delineating the roles and responsibilities of each institution is essential to reduce overlap, enhance accountability, and streamline coordination.



## 2.2 Medium and Small-Scale Mine Permitting Considerations

Most jurisdictions have provisions for modified permit requirements for medium and small-scale mines. For example, Western Australia has a low-risk category with a shorter defined service timeline for some permits. Peru has a semi-detailed ESIA process for medium- and small-scale mines. Chile does not require an Environmental Impact Study for projects with little impact. Such projects submit an Environmental Impact Declaration, which carries a 60 day decision timeline instead of the standard 120 day time frame.

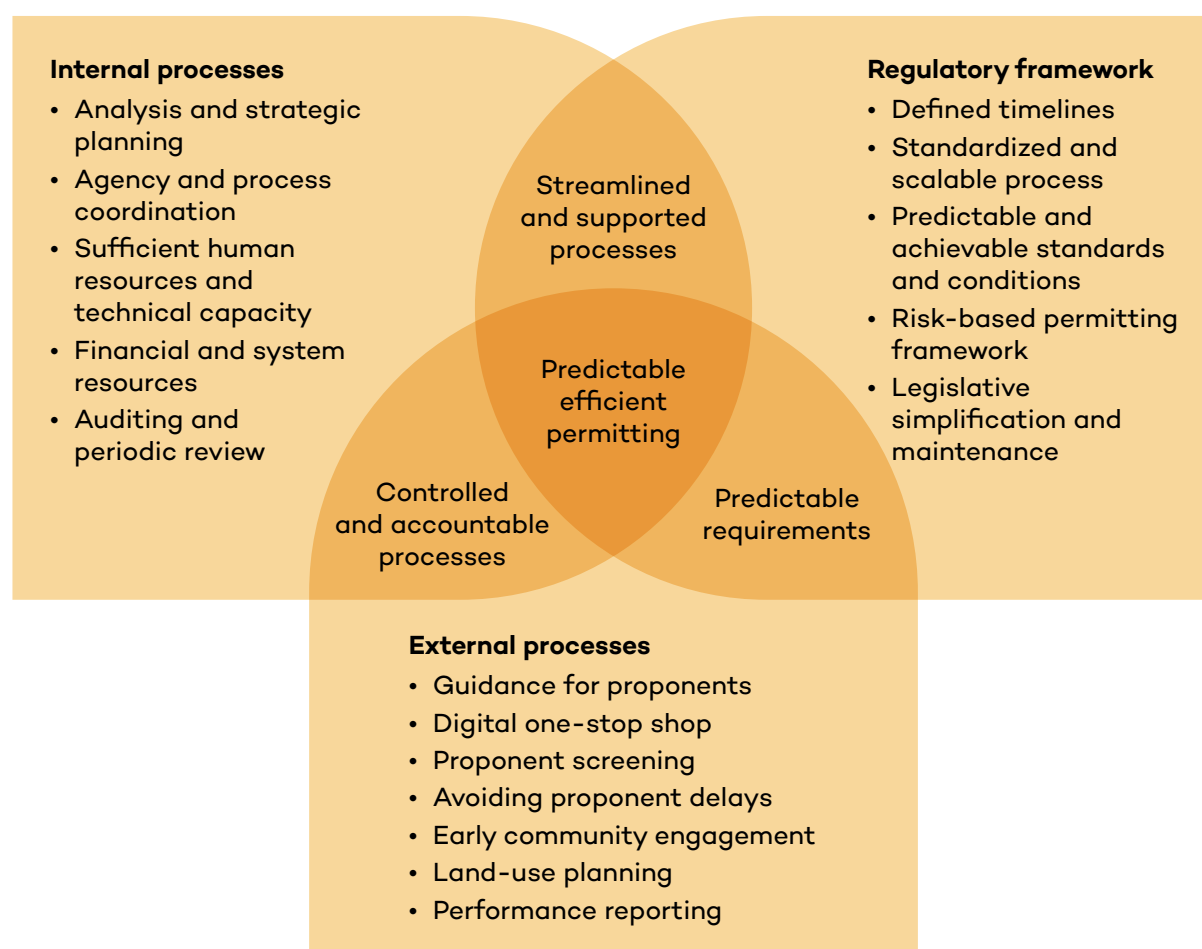
However, in many jurisdictions there is room for improvement to clarify thresholds and processes for permitting in medium- and small-scale mining. In some cases, the definition of what is a potentially significant impact that could trigger a full ESIA is often discretionary. In other cases, it is difficult to reduce scope for an ESIA for medium- and small-scale mines.



## 3.0 Tools

This section offers tools identified through the case studies to help governments, regulators, and reform advocates improve mining permitting. They aim to enhance efficiency, transparency, and proportionality without weakening environmental or social safeguards. Each tool draws on desktop research, comparative analysis, and documented reform experiences.

**FIGURE 3.** Components of a predictable, efficient permitting system



Source: Authors.



The tools are adaptable to diverse contexts and are particularly relevant to jurisdictions where permitting is fragmented, capacity is limited, or investment pressures are high while public trust must be preserved.

Figure 3 shows the integration of components to create a predictable and efficient permitting system based on the review of case studies. This model shows how a predictable and efficient permitting system is supported by the regulatory framework, internal processes, and external processes. The tools presented in this chapter are organized into these three areas.

Governments can consider the components and tools in analyzing and developing their improvement strategies.

## 3.1 Internal Process Tools

### 3.1.1 Analysis and Strategic Planning

#### What It Is and Why It Matters

A diagnostic analysis is used to develop a strategic plan for reform specifically for a country's objectives. Governments eager to boost mining often adopt quick “off-the-shelf” fixes—digital portals, single windows, fast-track labels—that look good on paper but miss root causes of delay. Without knowing where and why bottlenecks arise, reforms risk being superficial, ineffective, or harmful. In addition, when prioritization is guided by political discretion rather than institutional logic, it undermines fairness, generates uncertainty, and erodes public trust. A strategic approach ensures that permitting resources are directed toward projects with the greatest potential for impact, sustainability, and long-term value.

A diagnostic approach and strategic planning following the steps in Figure 4, using real data on permit timelines, rejection rates, coordination gaps, and legal disputes, reveals which permits, institutions, and procedures most affect projects. This allows smarter prioritization, targeted streamlining, and credible oversight.

**FIGURE 4.** Steps for strategic planning



Source: Authors.



## Key considerations for governments:

| <input checked="" type="checkbox"/> <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/> <b>Don't</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Collect data on permit durations, causes of rejection, and inter-agency failures.</li> <li>• Pinpoint permits that repeatedly delay projects or cause bottlenecks.</li> <li>• Get input from users (companies or professionals in the private sector; government permitting staff).</li> <li>• Use results to guide reforms: merge steps, clarify rules, improve guidance, or redesign workflows.</li> <li>• Connect diagnostics with broader reforms, such as tailored environmental reviews and transparency dashboards.</li> <li>• Share findings openly to build trust and drive momentum with industry and civil society.</li> <li>• Develop a strategy and implementation plan (including specific timelines, financial and human resources, clear organization).</li> <li>• Set SMART (specific, measurable, attainable, relevant, and time-specific) targets in the strategic plan and be realistic.</li> <li>• Implement with a clear implementation lead with associated authority.</li> <li>• Monitor, track, and manage progress based on measurable indicators.</li> </ul> | <ul style="list-style-type: none"> <li>• Design bureaucratic, validation-heavy processes—diagnostics must be thorough yet fast.</li> <li>• Rely only on anecdotes or political urgency—credible reform needs evidence.</li> <li>• Treat all permits alike—target those with outsized impact.</li> <li>• See bottlenecks as isolated—seek systemic patterns across sectors and regions.</li> <li>• Keep diagnostics hidden or filtered; transparency ensures accountability.</li> <li>• Roll out strategies without feedback loops and contingency plans.</li> <li>• Take on more work than is realistic with resource constraints.</li> </ul> |

## 3.1.2 Coordinating Agencies and Processes

### What It Is and Why It Matters

Coordination is needed between agencies such as ministries for mining, environment, heritage, water, energy, transportation, and community development and each of their respective approval processes. Harmonizing the processes allows for each agency to understand the breadth of mine development and approvals required, and to find efficiencies for parallel reviews, coordinated decision making, and complementary conditions of approvals. Coordination also allows for consistent information and direction to be communicated to the mining company, which allows companies to plan, schedule and budget accordingly.



## Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  <b>Don't</b>                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Assign one coordinating agency for mining projects.</li> <li>• Align review timelines.</li> <li>• Develop a standard coordinated process or project-specific coordinated process with all agencies.</li> <li>• Consider opportunities for concurrent reviews of permit applications with only the decision stage dependent on a prior approval, such as the ESIA approval or community approval.</li> <li>• Communicate the process across agencies.</li> <li>• Designate key people or positions in each permitting agency to administer permits for mining projects and provide mining-specific training as needed.</li> <li>• Develop a common repository and/or submission requirements for project information.</li> </ul> | <ul style="list-style-type: none"> <li>• Leave agencies out for “smaller” permits with the perceived assumption that it will save resources.</li> <li>• Miss opportunities for parallel reviews.</li> <li>• Overstep jurisdictions or mandates that would result in duplication.</li> </ul> |

## 3.1.3 Resourcing

The best regulatory framework will only work if it is supported by sufficient financial and human resources.

### Self-Financing Mechanisms to Strengthen Institutional Capacity

#### What It Is and Why It Matters

Governments can strengthen environmental authorities by adopting self-financing mechanisms, which are regulatory fees or service charges paid during permitting. These funds support staffing, training, digital tools, and specialized expertise in areas like hydrogeology, geochemistry, biodiversity, and cumulative impact analysis, which are often under-resourced but vital for sound decisions.

With many agencies facing chronic underfunding, transparent and proportionate fee structures make permitting financially sustainable and better equipped for growing demands. Properly designed and implemented, they improve evaluation quality and timeliness, reduce reliance on unstable budgets, enable strategic institutional investment, and reinforce credibility and trust.



## Key considerations for governments:

| ☑ Do                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | ⊘ Don't                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Set fees proportionate to project scale, complexity, and risk.</li><li>• Earmark and direct funds to strengthen technical, operational, and digital capacity in permitting agencies.</li><li>• Ensure transparency in fee calculation, collection, and use.</li><li>• Involve stakeholders in designing and reviewing financing mechanisms.</li><li>• Link mechanisms to measurable gains in timelines, staffing, and performance.</li><li>• Review and adjust fees on a regular, published timeline (e.g., every 3–5 years) to account for inflation.</li></ul> | <ul style="list-style-type: none"><li>• Apply flat fees that ignore project differences or create barriers for small-scale or early-stage activities.</li><li>• Channel funds into unrelated budget lines or general expenditures.</li><li>• Leave fee structures to discretionary interpretation.</li><li>• Impose fees without consultation or impact assessment.</li><li>• Treat fees as revenue tools without reinvesting in institutional capacity.</li></ul> |

## Use of External Expertise to Strengthen Technical Review

### What It Is and Why It Matters

Integrating external expertise into permitting reviews improves decision quality and timeliness by giving agencies access to independent, specialized knowledge. It helps overcome capacity gaps, ensures rigorous evaluation of complex projects, and supports compliance with legal timelines.

In some jurisdictions, international experts help agencies balance power with mining companies and strengthen their position in technical discussions.

For communities, external participation can also strengthen trust in the process.



## Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  <b>Don't</b>                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Use diplomatic channels to direct international cooperation toward these specific assistance needs.</li> <li>• Set clear accreditation criteria for external experts and institutions.</li> <li>• Check conflicts of interest, excluding firms or professionals linked to the mining company or its project.</li> <li>• Define the scope and limits of external advisory roles (with clear explanations of the background and context), ensuring agencies retain full decision-making authority and control of the process.</li> <li>• Use external advice mainly for highly technical and “one-shot” tasks, not ongoing or soft activities (e.g., hydrogeology modelling or tailings design, but not community engagement).</li> <li>• Ensure inputs are documented and accessible in the permitting process.</li> <li>• Communicate experts’ role to communities to strengthen transparency and trust.</li> </ul> | <ul style="list-style-type: none"> <li>• Rely on unverified or non-specialized individuals or entities for technical input.</li> <li>• Delegate regulatory decisions or legal responsibilities to external parties.</li> <li>• Use external support indiscriminately or without assessing institutional needs.</li> <li>• Accept undocumented or informal contributions that lack traceability.</li> <li>• Involve external experts or institutions without public disclosure or stakeholder engagement.</li> </ul> |

## 3.1.4 Auditing and Periodic Review of Permitting Frameworks

### What It Is and Why It Matters

Regular audits and review of mining permit rules keep frameworks relevant, modern, efficient, and risk proportionate. They allow governments to identify and remove outdated provisions and align obligations with changing environmental, technological, and operational realities. Regular reviews can also help ease pressure from either proponents or opponents complaining, ensuring they will be heard in the next review period.

Without periodic reviews, systems risk rigidity, inconsistency, and misalignment with evolving sector needs.



## Key considerations for governments:

| <input checked="" type="checkbox"/> <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/> <b>Don't</b>                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Mandate permitting framework audits and reviews at set intervals (e.g., every 3–5 years).</li> <li>• Involve regulators, industry, and communities to identify challenges and opportunities.</li> <li>• Publish results and ensure recommendations lead to concrete updates in laws, procedures, or digital systems.</li> <li>• Connect reviews to broader goals like transparency, digitalization, or sustainable development.</li> </ul> | <ul style="list-style-type: none"> <li>• Treat reviews as symbolic—outcomes must improve regulatory performance.</li> <li>• Limit assessments to legal texts—operational and coordination issues also matter.</li> <li>• Overlook staffing needs—reviews may compete with daily tasks, so external support can help.</li> </ul> |

### BOX 1. EXAMPLE: U.S. FAST-41 PROGRAM: A CROSS-GOVERNMENTAL APPROACH TO IMPROVING PERMITTING FOR MAJOR INFRASTRUCTURE PROJECTS

To address longstanding challenges in the federal permitting process—including significant delays, a lack of interagency coordination, transparency, and accountability—the U.S. Congress enacted Title 41 of the Fixing America's Surface Transportation Act (FAST-41) in 2015. The legislation established a statutory framework for improving the efficiency and accountability of environmental reviews and authorizations for major infrastructure projects.

A Permitting Council serves as the central oversight entity for FAST-41; it provides focused, hands-on permitting support to covered projects and improves efficiency through clearer timelines and better coordination across federal agencies. The council is made up of deputy secretaries from 13 federal agencies, along with representatives from the Office of Management and Budget and the Council on Environmental Quality. The council is chaired by an executive director appointed by the president.

Participation in the FAST-41 program is voluntary. Sponsors of infrastructure projects that meet FAST-41's eligibility criteria must request that their project receive coverage to obtain program benefits. All projects in the FAST-41 project portfolio are tracked on the public Permitting Dashboard, which provides real-time visibility into agency progress and milestone tracking. Importantly, the program does not alter substantive environmental laws or public participation requirements; it seeks to streamline coordination while preserving regulatory integrity.

Covered projects consistently demonstrate accelerated review timelines—on average, nearly 18 months faster in reaching a record of decision than comparable non-covered projects—while maintaining rigorous standards.

*Source: Authors' summary based on Permitting Council, 2024.*



**FIGURE 5. FAST-41 key features**

|  |                                                                                                                                                                                                                                                                                                                                                                        |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b>Greater visibility and predictability.</b></p> <p>Agencies must develop and maintain a coordinated, project-specific timetable for all required environmental reviews and authorizations. These schedules are publicly posted and updated quarterly on the Federal Permitting Dashboard, improving transparency and allowing stakeholders to track progress.</p> |
|  | <p><b>Enhanced interagency coordination.</b></p> <p>Within 60 days of FAST-41 coverage, the lead agency collaborates with others to create a detailed project plan. This includes strategies for public and Tribal engagement, early identification of alternatives, and alignment of review schedules.</p>                                                            |
|  | <p><b>Stronger accountability mechanisms.</b></p> <p>The Permitting Council oversees agency adherence to timetables and reports to Congress when a project timetable is extended beyond 150% of its original length. Annual reports also assess the agencies' performance and compliance with FAST-41 best practices and recommended schedules.</p>                    |
|  | <p><b>Improved legal certainty.</b></p> <p>The statute of limitations for legal challenges to authorizations is reduced from 6 years to 2. Lawsuits related to the National Environmental Policy Act are limited to parties who submitted comments during the review, and judicial review procedures are clarified for injunctions.</p>                                |
|  | <p><b>Structured dispute resolution.</b></p> <p>If agencies cannot agree on a timetable, the Permitting Council's Executive Director mediates. If unresolved after 60 days, the Office of Management and Budget issues a final decision.</p>                                                                                                                           |

Source: Authors' summary based on Permitting Council, 2024.

## 3.2 Regulatory Framework Tools

### 3.2.1 Defined Timelines

#### What It Is and Why It Matters

Defined timelines help manage expectations for all stakeholders. Companies can also then schedule and budget their resources accordingly to reduce delays from the company's side.

As a guideline, the time allocated for government and stakeholder review of the impact assessment should be sufficient to read the full application, ask questions, receive responses, and develop conditions. Based on case studies, ESIA for large mining projects take from 1 to 5 years (if not delayed by factors such as metal prices). The review timeline for subsequent major permits, such as water use, discharge, or emissions, is in the range of 2 to 6 months.



## Key considerations for governments:

| ☑ Do                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | ⊘ Don't                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Set realistic review or service timelines commensurate with the level of complexity and risk of the project and permit.</li> <li>• Clearly define permitting process timelines in legislation and in online published guidance.</li> <li>• Define criteria for “stop the clock” process stages.</li> <li>• Incorporate measurable target permitting service levels to track agency performance and identify bottlenecks.</li> </ul> | <ul style="list-style-type: none"> <li>• Leave the process open to arbitrary extensions of permitting processes.</li> <li>• Create unachievably short timelines that could compromise environmental and community protection.</li> </ul> |

### BOX 2. LEGALLY DEFINED TIMELINES IN THE EUROPEAN UNION

The European Union is not a single country, but it is worth noting that its Critical Raw Materials Act (Regulation (EU) 2024/1252, in force 23 May 2024) is a dedicated framework for strategic/critical raw materials. The act includes a Strategic Projects designation and binding permit time limits of 27 months for extraction projects and 15 months for processing/recycling projects. In addition, there is a designated agency in each country in the European Union to coordinate permitting of critical mineral projects. The commission designated 47 Strategic Projects in March 2025 and accepted applications for more in 2026 (European Commission, 2024, 2025, 2026).

## 3.2.2 Standardized and Scalable Process

### What It Is and Why It Matters

Governments can improve ESIAs and other permits by issuing standardized, adaptable Terms of Reference (ToRs) or requirements for mining projects. ToRs or requirements should ideally include glossaries, guidelines, and templates. This can reduce ambiguity and ensure clear, comparable information, easing technical review. Also, it enables a quick check of completeness to eventually reject a submission if necessary, avoiding the use of limited technical and administrative resources.



### Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  <b>Don't</b>                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Create templates adaptable to project stage and scale.</li> <li>• Provide clear guidance on required data, methods, and formats for consistency.</li> <li>• Enable legal grounds for quick rejection of incomplete reports.</li> <li>• Involve technical and legal experts early to ensure feasibility.</li> <li>• Use ToRs to streamline reviews and re-allocate human resources efficiently.</li> <li>• Periodically review and revise ToRs to maintain relevance and proportionality.</li> </ul> | <ul style="list-style-type: none"> <li>• Leave ToR requirements vague, open-ended, or overly generic.</li> <li>• Rely on outdated templates or internal assumptions without external input.</li> <li>• Overburden low-risk or early-stage projects with exhaustive and unnecessary requirements.</li> </ul> |

## 3.2.3 Set Predictable and Achievable Standards and Conditions

### What It Is and Why It Matters

Governments can develop standard ESIA approval and permit conditions, as well as environmental and community protection objectives. Standard conditions and objectives give companies clarity on the expectations for project design, reducing uncertainty and requests for information. They also reduce the timelines needed by government agencies to issue permits.

### Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  <b>Don't</b>                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Create standard conditions that can be adapted for the specific project.</li> <li>• Set realistic, achievable, clear, and enforceable conditions.</li> <li>• Get legal review of standard conditions.</li> <li>• Communicate standard conditions and objectives through guidance documents available online.</li> <li>• Consider setting progressive targets to allow time to achieve objectives.</li> <li>• Review draft conditions with proponents prior to issuing approvals to avoid appeals.</li> </ul> | <ul style="list-style-type: none"> <li>• Change the environmental and community protection objectives during the planning or review process.</li> <li>• Set unachievable conditions or objectives.</li> <li>• Issue approvals where the company will be immediately out of compliance resulting in appeals.</li> </ul> |



## 3.2.4 Risk-Based Permitting Framework

### What It Is and Why It Matters

A risk-based permitting framework tailors regulatory requirements to the environmental, social, and operational risks of mining projects. Permitting processes will be classified by criteria such as project scale, stage, technology, and potential impacts. Low-risk projects may use pathways like sworn statements or positive administrative silence, while high-risk ones undergo rigorous review and adaptable requirements. A risk-based approach increases predictability, limits discretion, reduces unnecessary burdens, and directs resources to the most critical evaluations.

#### Key considerations for governments:

| <input checked="" type="checkbox"/> <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <input type="checkbox"/> <b>Don't</b>                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Use permitting data and case studies to assess and set risk and procedural thresholds.</li> <li>• Involve technical and legal experts early to ensure the framework is feasible.</li> <li>• Clearly explain proportionality to communities and companies to build trust and avoid perceptions of regulatory favouritism.</li> <li>• Require companies to conduct acceptable impact-focused studies and follow those with strong monitoring and enforcement.</li> <li>• Pilot framework changes in selected regions or permits before scaling nationally.</li> </ul> | <ul style="list-style-type: none"> <li>• Assume risk-based design solves inefficiencies without fixing capacity gaps.</li> <li>• Design abstract categories untested in real permitting or agency workflows.</li> <li>• Develop the framework in isolation from implementers or affected groups.</li> </ul> |

## Sworn Declarations for Low-Risk Authorizations

### What They Are and Why They Matter

Sworn declarations let applicants self-certify compliance for low-risk activities, replacing permits with a binding statement. Within risk-based frameworks, this speeds approvals while maintaining control through ex post checks and enforceable sanctions.

The approach eases administrative burden and frees capacity for higher-risk reviews.



## Key considerations for governments:

| <div> <input checked="" type="checkbox"/> <b>Do</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <div> <input type="checkbox"/> <b>Don't</b> </div>                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Set clear legally and technically grounded eligibility criteria for low-risk activities.</li> <li>• Build strong ex post verification with audits, risk triggers, and penalties.</li> <li>• Communicate purpose and safeguards to prevent confusion with deregulation.</li> <li>• Integrate into digital permitting for traceability and consistency.</li> <li>• Monitor use and adjust thresholds or protocols as needed.</li> <li>• Train staff to verify, audit, and address non-compliance.</li> </ul> | <ul style="list-style-type: none"> <li>• Deploy without legal basis—declarations need enforceability and sanctions.</li> <li>• Assume streamlining equals less scrutiny—oversight must stay active and proportionate.</li> <li>• Allow unchecked expansion to medium- or high-risk activities.</li> </ul> |

## Positive Decision From Administrative Silence

### What It Is and Why It Matters

This mechanism grants automatic approval if authorities fail to act within set time frames, sometimes extending to full permit approval. It accelerates processes and reduces applicant uncertainty. Yet implementation must be calibrated: automatic approval is unsuitable for permits with high environmental or social risk.

## Key considerations for governments:

| <div> <input checked="" type="checkbox"/> <b>Do</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <div> <input type="checkbox"/> <b>Don't</b> </div>                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Apply positive silence selectively—only to procedural steps within process or permits with very low risk.</li> <li>• Expressly include this effect in the rules, specifying the cases in which it applies.</li> <li>• Establish reasonable time frames for decisions that will trigger this automatic approval.</li> <li>• Communicate purpose and safeguards to prevent confusion with deregulation.</li> <li>• Couple positive decisions with standard conditions, monitoring, and enforcement.</li> <li>• Monitor agency performance.</li> <li>• Pair with digital traceability and automatic notifications.</li> </ul> | <ul style="list-style-type: none"> <li>• Allow ambiguity about which steps or permits apply.</li> <li>• Leave deadlines undefined or non-binding.</li> <li>• Neglect the sensitivity of this solution—early implementation must be closely monitored to detect risks or opposition and adjust as needed.</li> </ul> |



### 3.2.5 Legislative Streamlining and “Housekeeping”

#### What It Is and Why It Matters

Legislative streamlining and “housekeeping” means checking that legislation clearly covers the mandate, is up to date, is coordinated, avoids duplication across different administration levels and divisions of government, and does not have unintended consequences. Mechanisms for maintaining the legal framework vary depending on whether the system is based on civil law, common law, customary law, or combinations of these. In civil law systems, housekeeping centres on consolidating and updating codified statutes and their implementing decrees through the official gazette. In common law systems, it also requires aligning statutes, subordinate regulations, and evolving case law so that guidance keeps pace with judicial interpretation. Where customary law applies, the task is different: customary rules are largely unwritten and are not maintained through legislative drafting, so the priority is ensuring the statutory framework clearly recognizes customary land tenure, traditional authority, and consent, and that conflicts between statutory and customary regimes are resolved rather than left ambiguous.

Evolving legislation can sometimes result in bloated and overly complicated legislation. Regularly maintaining a strong legal framework is essential for efficiency, to avoid confusion and create a streamlined system.



## Key considerations for governments:

### ☑ Do

- Conduct regular reviews of legislation to identify overlaps, inconsistencies, and duplication.
- Consider combining mining-related environmental authorizations into one or a few permits to reduce the administrative burden.
- Consider all levels of government and where the mining administration responsibilities and human and financial resources are allocated.
- Maintain a single, consolidated, publicly searchable online database of legislation in force—not only the gazette or decree of original enactment—so users can find the up-to-date law in one place.
- Publish summaries in plain language and a change log whenever mining or environmental legislation is amended, with effective dates and cross references to the consolidated text, so changes are visible rather than buried in omnibus instruments.
- Regularly update guidance for mining proponents addressing all necessary mining, environmental, and other permit requirements.
- Repeal old and superseded legislation.
- Complete a regulatory impact assessment for new or significant revisions of legislation to avoid unintended consequences.
- Define clear boundaries and thresholds for the application of each piece of legislation.
- Define the transition periods and processes for legislative changes.

### ⊘ Don't

- Leave legislative changes hidden in omnibus publications, gazettes, or decrees.
- Leave outdated legislation on obsolete or unmarked archived websites.
- Forget to check how new legislation interacts with other legislation.
- Delegate administration to regional or local governments without also moving mining revenue allocations and technical training.
- Leave a framework in place that requires hundreds of permits and that is not feasible to administer.



## 3.3 External Process Tools

### 3.3.1 Guidance for Proponents

#### What It Is and Why It Matters

Government guidance documents and websites outline the mining permitting approvals process to take a mineral project into production. The guidance provides companies, rightsholders, and stakeholders with a clear understanding of all the steps, key approvals, and expected requirements and timelines. It provides transparency and helps manage expectations so that all parties can plan and prepare appropriately, which in turn reduces delays in the overall process.

#### Key considerations for governments:

| <input checked="" type="checkbox"/> Do                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> Don't                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Prepare and publish online clear guidance documents on approvals to take a mine into development.</li><li>• Include links to other applicable agency websites, guidance, and legislation.</li><li>• Include expected timelines and process diagrams.</li><li>• Include application information requirements.</li><li>• Include links to digital application and tracking portals.</li><li>• Publish documents from other applications and review processes for transparency, learning, continual improvement, and trust.</li><li>• Periodically review and update guidance.</li></ul> | <ul style="list-style-type: none"><li>• Leave requirements and processes vague or discretionary.</li><li>• Require stakeholders to pay for guidance materials.</li><li>• Leave out-of-date information on websites.</li></ul> |

### 3.3.2 Digital One-Stop Shop

#### What It Is and Why It Matters

A digital one-stop shop is a centralized platform that integrates permitting processes across multiple government entities. It allows applicants to submit, monitor, and manage all required authorizations through a single interface. The system improves transparency, reduces delays, and enhances coordination by enabling interoperability between agencies. When well-designed, it becomes a cornerstone of digital transformation in sectors like mining, energy, and infrastructure.



## Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  <b>Don't</b>                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Anchor the initiative in legislation to ensure institutional commitment and mandate for cross-agency participation.</li> <li>• Ensure that the agency centralizing the process is sufficiently empowered.</li> <li>• Secure financing and technical expertise to support platform development, integration, and long-term maintenance.</li> <li>• Prioritize interoperability with existing systems in ministries and regulatory bodies to enable seamless data exchange.</li> <li>• Phase the implementation strategically, starting with high-impact permits and agencies with digital readiness.</li> <li>• Use the platform to standardize procedures, reduce discretion, and enable real-time tracking of applications.</li> <li>• Include mandatory fields in application forms to help ensure complete applications are submitted and reduce delays from requests for information.</li> </ul> | <ul style="list-style-type: none"> <li>• Treat digitalization as a cosmetic upgrade or a mere consolidation of applications; without process streamlining, the platform risks replicating inefficiencies.</li> <li>• Overlook the need for institutional coordination; siloed systems undermine the platform's value.</li> <li>• Delay stakeholder engagement; early input from users and regulators is essential for usability and legitimacy.</li> </ul> |

## 3.3.3 Proponent Screening

### What It Is and Why It Matters

Proponent screening helps verify that a company has the resources to develop a mine. Permitting delays can arise when companies push governments to approve mines without sufficient design work or a genuine intention to develop the mine. This can be referred to as “speculation,” where a company seeks to secure a permit primarily to increase the value of the property before selling it. Although there may be legitimate reasons to advance a project through permitting and then sell it, screening helps ensure governments do not spend time and resources on projects that are unlikely to proceed.



## Key considerations for governments:

| <input checked="" type="checkbox"/> <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> <b>Don't</b>                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Apply screening tools when mining companies submit proposals for development.</li> <li>• Request details to prove the financial security, existing performance, and economic viability of a project.</li> <li>• Require sufficient detail of project design for the level of approval (e.g., pre-feasibility-level design for ESIA, detailed design for air emission permits).</li> <li>• Require professional qualifications and engineering sign off for designs and impact assessments.</li> <li>• Complete regional land-use planning that includes areas designated for mine development to reduce permitting uncertainty for companies.</li> <li>• Consider completing a due diligence check on companies and their directors and management.</li> </ul> | <ul style="list-style-type: none"> <li>• Assume all companies are capable.</li> <li>• Issue permits without relevant professionally designed project details and impact assessments.</li> <li>• Accept promissory notes or other financial securities for reclamation or other property liabilities without legitimate backing and without allowing governments to access the funds in the event of a company dissolving or going bankrupt.</li> </ul> |

## 3.3.4 Avoiding Proponent Delays

### What It Is and Why It Matters

Delays in permitting processes can occur when proponents need to collect additional information, design project details, complete studies, and/or obtain additional funding. These can lead to what is often referred to as “stop the clock” delays. Although these delays are outside of government control, they still contribute to overall permitting timelines. Persistent delays in the overall permitting process can also erode trust in government.



### Key considerations for governments:

|  <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                           |  <b>Don't</b>                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Publish clear and detailed guidelines for required submissions.</li> <li>• Include mandatory fields in online submission forms to ensure required information is submitted before a review is started.</li> <li>• Include an initial application screening and “readiness” decision before a review timeline is started.</li> <li>• Incorporate “stop the clock” periods in legislation or guidance to separate out proponent delays from government service performance metrics.</li> </ul> | <ul style="list-style-type: none"> <li>• Wait until the end of a government review timeline to review application materials or reach out to proponents with requests for information.</li> <li>• Avoid meeting with proponents until an application is submitted, since meetings can help clarify government expectations.</li> </ul> |

## 3.3.5 Early Community Engagement

### What It Is and Why It Matters

Governments should complete early community engagement well before mining projects enter the permitting processes. The engagement can start during land-use planning processes for areas where mineral deposits occur and when mineral exploration projects are in advanced stages.

Structured early engagement—before permit submission—reduces conflict, improves design, builds legitimacy, and reduces delays. It gives communities, Indigenous groups, and other stakeholders a chance to raise concerns, suggest alternatives, and understand impacts early, lowering risks of unanticipated or unwanted impacts, conflicts, or delays. Early engagement to gain consent and develop agreements with Indigenous and local communities helps reduce delays.



## Key considerations for governments:

| <input checked="" type="checkbox"/> <b>Do</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> <b>Don't</b>                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Define clear procedures for voluntary early engagement, including timelines, documentation, and feedback integration.</li> <li>• Ensure that early input informs the selection of alternatives, project design, and environmental scoping.</li> <li>• Provide technical support and translation for affected communities.</li> <li>• Link early engagement outcomes to formal permitting documentation.</li> <li>• Set up mechanisms and agreements to ensure local communities realize benefits from mining revenues.</li> <li>• Build community capacity through education.</li> <li>• Manage community expectations.</li> <li>• Engage women.</li> </ul> | <ul style="list-style-type: none"> <li>• Leave engagement to project proponents alone—government must play a convening role.</li> <li>• Treat early engagement as symbolic.</li> <li>• Assume all stakeholders have equal access or capacity to participate.</li> <li>• Allow disconnection between early dialogue and final permit decisions.</li> </ul> |

### BOX 3. EXAMPLE: THE BUILDING CANADA ACT AND CHALLENGES WITH FAST-TRACKING PERMITTING IN CANADA

Requirements for Indigenous and community consultation make it difficult to meet shortened timelines at all levels and needs to be considered in all strategies to make changes from the project level to the national level. Canada recently brought in new legislation, including the Building Canada Act, to support development of critical minerals and in response to increased political and economic pressures. The purpose of the Building Canada Act, as set out in Section 4, “is to ensure that projects that are in the national interest are advanced through an accelerated process that enhances regulatory certainty and investor confidence, while protecting the environment and respecting the rights of Indigenous peoples” (Government of Canada, 2025).

Human rights can be put at risk when taking measures to fast-track permitting. Expediting the Building Canada Act within a period of one month resulted in considerable opposition from Indigenous communities that were not adequately consulted regarding the potential impacts on their Constitutional Rights and Title. Canada’s prime minister is addressing the concerns partially by enabling equity ownership in large infrastructure projects (Prime Minister of Canada, 2025). The act itself also contains mandatory provisions for Indigenous consultation, and the government appointed an 11-member Indigenous Advisory Council to work with the Major Projects Office on project fast tracking (SpearChief-Morris, 2025).

Five proposed projects, including two critical minerals mining projects, were identified to be fast tracked in less than 3 months of passing the legislation (Nardi, 2025). Nonetheless, there continues to be concern over protecting Indigenous rights and the environment with fast-tracking projects (SpearChief-Morris, 2025).



## 3.3.6 Land-Use Planning

### What It Is and Why It Matters

Government-led land-use planning provides the foundation for future mine permitting and development. It helps define mining areas and the environmental, social, and cultural values that need to be protected or developed in a region.

Land-use planning supports sustainable development, reduces future conflict, and shortens permitting timelines for mine development. Communities are also more amenable when they have been meaningfully engaged through the planning process.

#### Key considerations for governments:

| ☑ Do                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | ⊘ Don't                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Complete land-use planning early to allow for meaningful engagement.</li> <li>• Engage all rightsholders and stakeholders and consider shared decision making.</li> <li>• Consider using strategic environmental assessments for land-use planning incorporating cumulative effects assessment.</li> <li>• Support formalizing community governance structures that can support future community benefit agreements and mechanisms for consent.</li> <li>• Incorporate climate change.</li> <li>• Include resources for future monitoring, management, and updating plans.</li> </ul> | <ul style="list-style-type: none"> <li>• Create a plan without engaging all levels of government.</li> <li>• Exclude resource development industries.</li> </ul> |

## 3.3.7 Performance Reporting

### What It Is and Why It Matters

Permitting processes are often opaque, fragmented, and prone to delays that erode trust and confidence. Public dashboards address this by publishing key data—such as milestones, responsible officers, and/or agency timelines—creating accountability and supporting coordination. Transparency improves performance, builds legitimacy, and makes permitting more predictable and fairer.

By using this tool, governments create pressure for institutional accountability and continuous improvement. These dashboards also support inter-agency coordination by enabling regulators to track progress, flag delays, and intervene early when projects stall.



## Key considerations for governments:

### ☑ Do

- Include project-specific timetables with milestone dates for each required permit and review.
- Track performance metrics by agency (e.g., average processing times, missed deadlines) to trigger corrective action.
- Include details of the officials in charge of each agency and, if applicable, the coordinator.
- Provide downloadable datasets for independent analysis by civil society, academia, and oversight bodies.
- Design dashboards to support internal coordination and reform tracking, not just public display.

### ⊘ Don't

- Show generic timelines without tying them to projects or legal duties.
- Fragment permit data across agencies—this confuses applicants and delays coordination.
- Use dashboards to signal political support or fast-tracking—this erodes trust and neutrality.
- Treat dashboards as cosmetic instead of linking to performance management.
- Let dashboards become outdated or detached from real workflows.



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