

RESEARCH PAPER SERIES

ELLA Area: Economic Development

ELLA Theme: Oil and Gas: Local Content



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Evidence and lessons
from Latin America

DESIGN AND METHODS PAPER

LOCAL CONTENT FRAMEWORKS IN LATIN AMERICAN AND AFRICAN OIL AND GAS SECTOR

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ACODE

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INTRODUCTION

The ELLA Research Design and Methods Papers are working documents produced by the Latin American-African research pairing, as the first stage in the conduct of their joint research. Production of the papers was aimed at fostering a shared framework and approach to the research, owned by both partners in the research pairing. As the centres proceed to the research itself, the design will inevitably evolve to address issues arising. As such these Design and Methods papers should be seen as an approximation towards the intended research direction.

1. TOPIC

The limited nature of mineral resources and demands of the extractive sector require policymakers to find mechanisms to maximise the sector's benefits. One mechanism to achieve this is so-called 'local content'. Local content refers to the actions a country can adopt to increase benefits from the extractive sector through the promotion of local employment, skills development, and national industry participation.

The promotion of local content has become a matter of increasing interest and debate in Africa and Latin America. Despite this, local content experiences from both regions are scattered and outcomes are undocumented. In order to inform the debate and provide policymakers with evidence to decide whether local content is the best policy option, this study seeks to map local content frameworks in Latin America and Africa and analyse possible outcomes.

2. LITERATURE REVIEW

Defining Local Content

During the last few decades, discussions among policymakers have focused on topics related to the generation and management of revenues from the oil and gas sector. However, how to build links between the mineral and other economic sectors is the question that guides the current debate on natural resources (Dietsche, 2014). An alternative approach to addressing this question is so-called 'local content'.

Local content can be defined as the extent to which the output of the extractive industry sector generates further benefits to the economy beyond the direct contribution of its value-added, as through links to other sectors (Tordo, Warner, Manzano, & Anouti, 2013). These links are created when the oil and gas industry, because of its operations, purchases inputs that are supplied domestically instead of importing them. In this sense, local content seeks to expand the share of nationally produced goods and services that are needed for oil and gas exploration, development, and extraction (Heum, Kasande, Ekern, & Nyombi, 2011). To simplify, the aim of a local content policy is to expand the benefits beyond revenues of oil and gas activities for the national economy through the achievement of certain outcomes.

The most common outcomes that local content policies seek to address are local employment, skills development and national industry participation (Esteves, Coyne, & Moreno, 2013). Local employment and national industry participation are promoted when companies related to the oil and gas sector are required to hire national workforce and to purchase goods and services from national companies for the development of its operations. On the other hand, skills development is incentivised due to the fact that, to comply with the previous requirements, companies and government have to build skills and capacities in the national industry that provides goods and services as well as in the national workforce.

From a different perspective, Levett and Chandler (2012) mention that private companies can apply local content practices (specially multinational corporations) in order to reduce the costs and time needed to obtain goods and services, and create supporting operating environments by giving communities a stake in a project (Esteves & Barclay, 2011; Levett & Chandler, 2012).

Although the establishment of a local content policy could be perceived as the best alternative for policymakers, there are major challenges that must be considered. Some of these challenges are described in the next section.

Other Aspects of Local Content

Local content policies aim to increase participation in the national industry, create job opportunities for nationals, and increase the level of local skills and capabilities. However, these policies can have downsides if they are not adapted to specific national contexts, including slow procurement; higher industrial concentration in the extractive sector; hindering of production targets and competitiveness. They can also foster corruption, lack of transparency and more bureaucracy, amongst other things (Tordo et al., 2013). If policy to enhance local content is badly implemented or enforced, it may do damage to the economic development of the host country. Even if the policy is properly conducted, policymakers have to be aware that there are extra costs associated with local content expansion that can only be justified if they turn out to serve as investments that pay off in the future (Heum et al., 2011).

Additionally, the implementation of local content policies can produce negative effects when increasing the participation of the local industry such as consuming wealth rather than creating value, attracting high cost investors and inferior industry development (Heum et al., 2011). Furthermore, there are social impacts like demographic change associated with in-migration, concentration of economic activity around the project area, changes in patterns of land use, and institutional change (Esteves & Barclay, 2011).

For these reasons, it is important to keep in mind that expected benefits need to be closely related to the analysis and understanding of the contexts and factors that account for different results when adopting local content policies (Kazzazi & Nouri, 2012; Heum et al., 2011; Tordo et al., 2013). A better understanding on local content and its possible outcomes helps to keep a country's expectations realistic regarding the implementation of these type of measures. Complementarily, it is necessary to understand the dynamic of every stage of an oil and gas project along its value chain in order to assess intervention through local content policies (Hanlin, 2011).

Local content policy implementation is a complex process for a new oil and gas producing country or even an experienced one. There are several considerations that must be taken into account before establishing a local content policy. Currently, there are countries that have established different types of frameworks to promote local content and are described in the next section. However, the evidence of the outcomes of local content frameworks in their economies is limited.

Experiences from Selected Case Studies

Experiences and evidence regarding local content policies and practices are mixed and expected outcomes depend on a series of factors such as local content policy design (Nordas, Vatne, & Heum, 2003). Different outcomes have been achieved by countries depending on the framework they adopt to promote local content. Nonetheless, there are other factors that influence the outcomes of local content such as the ability to enforce these frameworks, the economic and social environment of the country, available technology, transparency, and more.

Oil and gas producing countries have established different types of framework to foster local content through the promotion of employment, skills development and national industry participation. These frameworks vary from broader national policies, different types of legislation (local content laws, local content within laws, decrees, regulations, etc.), and special considerations in contracts. Experiences from other countries provide lessons on how these frameworks have been implemented in diverse scenarios. Nevertheless, when establishing a local content policy, each country has a different approach depending on its context and needs. Local content cannot be applied in the same way in every country due to the diversity of contexts and challenges that they face. This means that there is not a “local content manual” that countries can replicate exactly.

Available literature focuses mainly on cases that include Angola, Brazil, Indonesia, Kazakhstan, Malaysia, Mexico, Nigeria, Trinidad and Tobago, and Norway (Heum, Quale, Karlsen, Kragha, & Osahon, 2012; Heum, 2008; Nordas et al., 2003; Tordo & Anouti, 2013).

Local content specific laws are not common among these cases. Nigeria is the only country that has established a local content law (Nigerian Oil and Gas Industry Content Development Act, 2010). However, there are similarities between the frameworks implemented by countries to foster employment, skills development and national industry participation. Contracts and agreements appear to be the most commonly applied tools by the countries from the documented case studies. These countries include specific clauses and requirements in their contracts and agreements that seek to promote local content. Laws are also commonly applied but with a different focus. For instance, Angola and Kazakhstan have specific laws to employ and train nationals and to foster public procurement respectively. Brazil, Indonesia, Malaysia and Trinidad and Tobago have established general local content principles within their petroleum laws (Tordo & Anouti, 2013).

Decrees are other tools that countries use for specific requirements. In this sense, with the purpose of boosting the national workforce Angola has set up a national Decree (20/82) that

contains specific requirements for the areas of recruitment, training, and career progression of the local workforce. This framework was complemented with another Decree (13/10) that gave Angolans legal protection against discrimination in employment conditions. Meanwhile, Kazakhstan has several Decrees regulating procurement, reporting forms, state programmes on local content, and measurement of local content, among others. Other sorts of tools include special regulations (Brazil), tender evaluation criteria for awarding contracts (Brazil), and National Oil Companies manuals, guidelines and policies (Indonesia and Mexico) (Nordas et al., 2003).

Finally, local content requirements can be included in broader national laws as in Angola (Law 14/03 to promote Angolan enterprises in other sectors), Indonesia (Investment Law no. 25/2007 and Company Law 40/2007), Malaysia (Companies Act) and Trinidad and Tobago (Fiscal Incentives Act, Foreign Investment Act); likewise, they can be included in broader national policies and plans as in Malaysia (Economic Transformation Program) or Trinidad and Tobago (The Local Content Policy Framework) (Tordo & Anouti, 2013).

A benchmark case for many aspects in the extractive sector (and also when it comes to local content) is Norway. This country established a local content policy that let it become competitive internationally by developing its industrial sector and workforce. However, it is important to highlight that by the time oil production started, Norway already had an industrialised economy and stable institutions able to design and adopt local content policies that were easily transferable and beneficial to other economic sectors (Heum, 2008). For many countries such as Nigeria, Mexico or Indonesia, the scenario has been quite different in the sense that the need to establish institutions and an enabling economy came after oil discovery. Hence, the adoption of local content frameworks is filled with challenges Norway never had to face. For this reason, authors claim that the experience in Norway is almost impossible to replicate (Heum et al., 2011).

Documented case studies have seen different outcomes and challenges from the implementation of frameworks. While law 10/79 has had positive outcomes incrementing Angolans working in oil and gas companies in three levels (unskilled, mid-level and upper level staff), Angola has faced problems of corruption and bureaucracy. Regarding national industry participation, foreign oil companies have faced challenges in coexisting with domestic firms and suppliers due to inexperience. Brazil, on the other hand, has focused more on the participation of its national industry through the implementation of regulations and requirements. Its policy focused on bidding processes appears to be resulting in promising outcomes. The average of local content commitments resulting from bidding rounds has increased from 27% in 1999 to 84% in 2008 regarding the development phase. Despite this, Brazil has faced challenges due to the delays of suppliers that have caused a decrease in Petrobras' production.

Indonesia appears to be facing challenges regarding the application of its frameworks. Indonesia's petroleum law establishes important requirements to promote local content; while the percentage of local content has increased from 43% in 2006 to 61% in 2011, the companies' upstream investment has decreased from 36.8 billion dollars in 2006 to 19.4 in 2011. Kazakhstan's approach through very specific frameworks has had important outcomes. Since the implementation of the methodology and certification process (Decrees 1130/2007, 367/2007 and 964/2010) levels of local content in employment have improved significantly. Kazakhstan has also increased its national industry participation, especially during the development phase. However, the country is facing the same challenges regarding the capacity of its local suppliers to meet the sector's requirements (Nordas et al., 2003; Tordo & Anouti, 2013).

It is important to highlight the fact that the selected case studies present tendencies and overall adopted frameworks for the promotion of local content in various countries. However, case studies and literature focus mainly on the previously mentioned countries, and there is not available literature that systematises the experience of other oil and gas producing countries.

Local Content in Africa and Latin America

As discussed in the previous section, there is limited documented literature about cases of countries that have adopted local content policies. This literature includes only a few cases of Latin American and African oil and gas producing countries.

Brazil, Angola, and Nigeria are countries from Latin America and Africa that have established an official local content policy and have been implementing it for many years. Beside these cases, there are also oil and gas producing countries in Latin America and Africa that have established frameworks to promote employment, national industry participation and skills development. For instance, in countries such as Bolivia, Colombia and Ecuador there is no specific legislation for local content in the oil and gas sector. Nonetheless, there are regulations contained in different frameworks that seek to promote national employment and local sourcing practices.

In the case of Ecuador, there are regulations that promote local labour. For example, Article 75 of the Mining Law establishes that 80% of the companies' workforce must be Ecuadorian. Likewise, Article 31 of the Hydrocarbons Law contains a regulation for companies that provides services to national oil company (NOC) EP Petroecuador that establishes that these companies must hire 90% of Ecuadorian citizens for technical positions and 100% for administrative ones (Grupo FARO, 2014).

In Bolivia the situation is similar to Ecuador. Article 334 of the National Constitution establishes that “the Bolivian state guarantees the preference in the acquisition of materials, for the micro and small enterprises and the productive community organisations”. This article has been crucial especially for the gas sector where the State has a strong participation through its NOC, YPFB (Fundación Jubileo, 2014). Furthermore, Article 15 of the Hydrocarbons Law establishes that “under no conditions, companies’ foreign personnel can exceed the 15% of the total share on employees”. In the same way, Article 68 of this law establishes that “companies that subscribe contracts with YPFB must have explicit clauses about preferential process to hire workforce, purchase goods and services and training processes to YPFB’s employees” (Bolivian Hydrocarbons Law No. 3058, 2005).

Colombia has no specific regulation or articles in its Hydrocarbons Law. However, the Minerals Law in its article 253 establishes that the Colombian state invites companies to increase the capacities of local workers; likewise, Article 254 mentions that the Ministry of Mines and Energy is the authority in charge of designating the percentage of local workers employed in extractive activities (Martínez, 2014). Mexico has recently passed a petroleum law that establishes the promotion of “national content” by Pemex (Mexico’s NOC) (Mexican Petroleum Law, 2014). Venezuela has also established articles that promote local content, especially through national industry participation; its Hydrocarbons Law establishes that the Executive must adopt measures that promote the formation of national capital through the incorporation of nationally based companies in the oil sector (Venezuelan Hydrocarbons Law).

The cases of African countries are different since they have more focused local content frameworks. For instance, in November 2014, Tanzania published a new model Production Sharing Agreement, which tightened local content provisions obliging companies to “maximise their utilization of goods, services and materials from Tanzania” and giving priority to nationals. It is up to the industry to create mechanisms and strategies to drive local content development, or in some cases, to circumvent local content requirements. In Angola, local content legislation is clearly identifiable but different laws govern different areas of local content and there is no single institution to supervise enforcement. Various stakeholders, sometimes with conflicting agendas and responsibilities, govern different aspects and compliant status is not achieved at one time.

Even though Nigeria has a local content law, main obstacles to the development of local content are its lean production stand, bureaucratic obstacles, and the lack of adequate power and other basic infrastructure to support an expanded manufacturing base (Jegade et al, 2014). In Ghana, where there is also a local content law, high unemployment rates have resulted in increased demand for the creation of opportunities within the petroleum industry

for the benefit of citizens of Ghana and indigenous Ghanaian companies. However, the national constraints of the country are clearly evident in the areas of finance, human resource and requisite enhanced technology.

There are other Latin American and African countries that include, either in their national or in their specific oil and gas frameworks, policies focused on the promotion of local employment, skills development and national industry participation. Nonetheless, there is little literature that collects these experiences from oil and gas producing countries from Latin America and Africa. Furthermore, the information about the outcomes of these frameworks is scattered and undocumented.

3. JUSTIFICATION

There are two important gaps regarding the topic of local content in Latin America and Africa that this research attempts to assess.

On one hand, although the oil and gas sector is fundamental for various economies in both regions and the current debate focuses on how to build links, local content experiences are scattered. Documenting and analysing trends in the adoption of different types of frameworks to promote local content in both regions will contribute to existing literature by generating information on cases that are not commonly analysed. This “mapping” effort will also provide policymakers in Africa and Latin America with the tools to critically analyse the paths that other countries have taken and their main lessons. These lessons will be more relevant for countries in Latin America and Africa than the existing lessons in current documented cases (Norway, Australia, Malaysia, Kazakhstan, Canada etc.). Furthermore, analysing the frameworks that Latin American and African oil and gas producing countries have adopted will promote and inform the debate between policymakers and key stakeholders from both regions.

There is a second gap regarding the outcomes of frameworks that countries adopt to promote local content. As the experiences of oil and gas producing countries on this topic remain scattered, the evidence on the outcomes that these frameworks have had on employment, national industry

participation and skills development is undocumented. In this sense, the analysis of the possible outcomes of local content frameworks that Latin American and African oil and gas producing countries have adopted will complement the “mapping” of frameworks by assessing their effects in key indicators. This effort will contribute to the decision-making process with valuable information about which type of local content framework has or has not been translated into positive outcomes in different contexts or if it is worth adopting a local content framework.

This study will also encourage south-south learning between Africa and Latin America and aims to provide useful tools for the decision-making process in Africa based on evidence, lessons and experiences from Latin America. Specifically, this research will contribute key recommendations and information to decision makers from Uganda due to the country being currently at the stage of creating the local content framework for its oil and gas sector. Other African countries will certainly benefit from the research since they are also discussing the possible creation of local content frameworks.

This research is relevant to African countries since a combination of political, market and social economic factors has pushed them to pursue local content policies. Nigeria, for example, will have a population of over 200 million by 2020 and the emergence of a younger and better educated generation will mean that the government must create jobs and economic opportunities for all (Wilson and Fofaria 2014). At the same time, economic shocks such as the global financial crisis are driving home the need for sustainable, self-reliant, economic development for resource and non-resource economies. There is a need to harness the potential industrial multiplier effects of oil or mining revenue.

Latin American countries also will benefit from the discussion and evidence gathered on local content frameworks and their possible outcomes. While some countries in the region are evaluating ways to reduce natural resource dependency through the adoption of local content related measures, others are discussing the possibility of reducing their local content provisions to foster competitiveness and attract investors. Either way, regional and comparative evidence in this topic has the potential to raise interest among stakeholders in both regions.

4. CENTRAL RESEARCH QUESTION

The study seeks to fill the gap of the limited availability of local content experiences in Latin America and Africa by identifying the different types of frameworks within which local content is promoted and by observing the outcomes of these frameworks. The question this study aims to answer reads:

What types of frameworks promote local content in Latin American and African oil and gas producing countries and what have been the outcomes of these frameworks?

By answering this question, the study seeks to provide policymakers with evidence about different local content policy design options and their possible outcomes. The mapping of case studies in Latin America and Africa also intends to serve as a regional local content catalogue that will give ground for future research in the field.

5. HYPOTHESIS

The study seeks to identify different types of local content framework, and will also observe if the outcomes for each different framework vary accordingly. Evidence in the literature (based on documented local content case studies) suggests that policy design might influence the outcomes. Additionally, lessons from other countries seem to indicate that local content cannot be conceived as a unique and standardised set of actions countries can adopt to achieve the same kind of outcomes. Therefore the research is based on the premise that not all countries in Latin America and Africa have the same kind of local content frameworks and that the outcomes of

these frameworks are going to be different in each case.

Therefore the hypothesis states:

Some types of local content frameworks in oil and gas producing countries in Latin America and Africa are better suited than others to promote employment, skills development, and national industry participation.

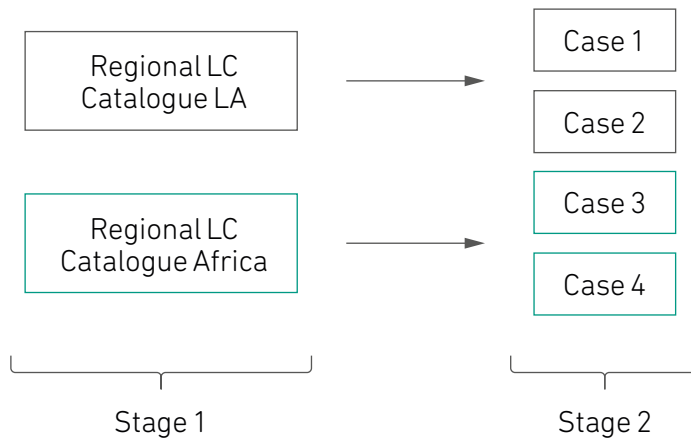
For the purposes of this research, a local content framework is going to be understood as the set of policies, laws, and contracts a country has adopted to promote local content. The outcomes of these frameworks are going to be analysed by observing the evolution of local employment, skills development, and national industry participation indicators. This research recognises that frameworks (policies, laws and contracts) are not the only factors that might have an influence on the outcomes local content aims to reach. For this reason, the path between local content frameworks and its outcomes is not a straight one and the possibility to establish a direct relationship between both presents obvious challenges. In order to reduce uncertainty, this research focuses on outcomes instead of on impacts. An outcome will tell us what type of change has occurred since the existence of a certain local content framework by observing the changes in selected indicators. Impacts, on the other hand, would look at the degree to which the observed outcomes are attributable to the local content framework.

6. RESEARCH DESIGN

This research aims to fill the gap in available information regarding local content in Latin America and Africa by mapping local content frameworks and its outcomes. The state of the literature, and the available evidence of local content frameworks in the region, calls for an exploratory and descriptive approach to assess the proposed research question. This research seeks to develop a regional catalogue of local content experiences in both regions and more detailed observation of case studies in Africa and Latin America to find connections between local content frameworks and outcomes in terms of local employment, skills development and, national industry participation.

In this sense this research will be structured in the following way:

Figure 1.



In order to answer the research question, the following evidence will be gathered: a. local content policies, legislation and contracts per country in both regions, and overall context characteristics – Stage 1 and, b. indicators to measure outcomes in terms of local employment, skills development and national industry participation – Stage 2.

a. Stage 1 - Local content frameworks based on the observation of local content policies, legislation, and contracts in Latin American and African oil and gas producing countries. For the purposes of this research, local content frameworks will include the elements (policies, laws, etc.) developed by the state (at the central or local level) that reflect the national position regarding local content. This research will not be concerned with the actions adopted by private companies¹ to promote local content. Elements of local content frameworks will include:

- Local Content Policies. Include general statements to enhance local content, but are not legally binding, such as national plans and programmes.
- Local Content Legislation. Includes local content laws, local content provisions in laws, decrees, and amendments.
- Contracts. Legally binding agreements between the state and oil and gas companies.

¹Including the practices of private companies in the analysis would imply going deeper into the discussion of implementation (how the guidelines provided by the State are being or not being implemented by the oil companies, how they interpret local content frameworks), which this research is not going to address.

Local content frameworks are simultaneously going to be classified in terms of local content's intended goals: local employment, skills development, and national industry participation. The following table will be used to classify the information for each country. As information in each country becomes available it is possible that the following table will be adjusted to reflect the findings.

Table 1. Matrix of Analysis - Local Content Framework per country

		Local Content Frameworks		
		LC Policies	LC Legislation	Contracts
LC intended goals	Local Employment			
	Skills Development			
	National Industry Participation			

This two-dimensional classification helps to characterise local content frameworks according to the goals that local content aims to reach and identifies the tools the state has adopted accordingly. This stage of the research will be accompanied by a contextual analysis in order to frame the local content scenario in each country. This analysis will allow for observation of the factors shaping the adoption of local content policies in different countries. The understanding of context will allow identifying patterns in the adoption of local content practices and better insight into the conditions under which local content exist in a country. The overall regional scenario will provide the basis for a typology of different frameworks for local content requirements (for example, what types of countries/regimes adopt what type of local content frameworks).

After the regional catalogue of local content frameworks (in Africa and Latin America) has been developed, case studies (two per region) will be selected. The selected cases will represent countries close to the realities and needs of Uganda and Ecuador. Stage 2 of the research will deal with the case studies.

- b.** Selection of case studies and observation of outcomes in terms of local employment, skills development, and national industry participation. Once the catalogue has been completed, outcomes will be observed in the selected case studies. The outcomes of the existing local content frameworks will be evaluated in terms of the goals (local employment, skills

development, national industry participation) formulated by the state and measured by indicators related to these goals. The indicators will be case specific since it is not possible to determine generic indicators to observe the outcomes of different local content frameworks. Deeper contextual analysis will take place at this stage.

Once this information (local content framework and outcomes) has been gathered for the selected cases, it remains to observe whether there is a relationship between frameworks and outcomes (to test the hypothesis). This last point will be addressed by comparing countries' frameworks and outcomes and see if there are patterns that support the idea that frameworks could somehow influence outcomes.

7. RESEARCH METHODS

Gathered data will be analysed in two stages and with different approaches depending on the stage of the research. The first stage will be focused on the identification of local content frameworks and contexts, and the second stage will focus on the definition and analysis of case studies to observe outcomes and conduct more detailed analysis on country cases relevant to Ecuador and Uganda.

Data Collection and Analysis

Once the case studies have been identified, data will be collected to address two points: a) definition of local content frameworks – stage 1, b) case studies and analysis of outcomes – stage 2

a. Data for the definition of local content frameworks.

Qualitative data will be used to address this section. The main sources of data to define local content frameworks will be official sources and legal repositories in each of the selected countries. Data collection in this category will look at existing policy documents, legislation (laws, decrees, amendments, for example.), and contracts in which local content provisions are contained.

Local content provisions might be general (solely mentioning or defining local content), or specific (referring to local content goals such as employment, skills development, and national industry participation). Furthermore, local content might be expressed as a legal instrument by itself (Local Content Law) or as part of a more general legislative tool (Local Content section in the Hydrocarbons Law). In the case of contracts, local content provisions in these tools will be also observed. Data gathered for this section will be collected and summarised using Table 1 as reference (see Research Design Section above).

The analysis of the elements that comprise local content in each country will be made through legal and documental analysis. Once elements in each country have been identified it will be possible to observe what kind of approach the country has towards local content and what tools it has adopted to achieve it. This analysis is going to be made for each country. Once frameworks have been identified it will be possible to observe patterns and differences between countries and have a regional perspective on local content.

b. Stage 2 – Data for the analysis of outcomes.

With the definition of local content frameworks, case studies will be selected (two per region). These case studies are intended to give a closer and more detailed perspective on local content frameworks and their outcomes. Indicators to observe outcomes are going to be identified after the local content frameworks have been mapped. Based on these frameworks (and the goals they want to achieve), outcomes could be observed using a quantitative approach. Indicators to measure outcomes are going to be sector specific (employment in the oil and gas sector) in order to avoid generality (as with national employment indicators, for example).

The influence of local content frameworks on outcomes will be analysed through the observation of the evolution of indicators before and after the adoption of the local content frameworks. Interviews with key stakeholders from the public and private sector will be held in order to complement this analysis and qualitatively assess the nature of the connection between local content frameworks and its outcomes.

The selection of case studies will be conducted once the regional catalogues have been compiled. Two cases will be selected for each region taking into account relevance to identifying lessons for Ecuador and Uganda.

Case Selection. The selection of cases for the regional local content catalogue will try to include the majority of oil and gas producing countries in both regions in order to have a wide selection of local content frameworks. In Latin America, all oil and gas producing countries will be included in the first stage of the analysis. These countries are: Argentina, Bolivia, Brazil, Colombia, Ecuador, Mexico and Venezuela. The criteria for the selection of cases in Africa will be almost the same, but will leave out: a) Arabic countries since their national reality differs from the African countries this research seeks to identify lessons for, and b) countries with limited access to information and existing language barriers. African countries included in the initial analysis are: Angola, Chad, Equatorial Guinea, Gabon, Ghana, Nigeria and Republic of Congo.

The selection of case studies will be conducted once the regional catalogues have been compiled. Two cases will be selected for each region taking into account relevance to identifying lessons for Ecuador and Uganda.

Latin American countries not included in the list do not have representative oil and/or gas sector.

² Latin American countries not included in the list do not have representative oil and/or gas sector.

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