Better Regulation can be so much better
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Better Regulation Watchdog

- 64+ CSOs
- Goal: represent public interest
- First meetings Dec 2014
- Going live 18 May 2015
- Internal event 29 June
- Public debate 12 Oct
Agenda for this presentation

- The problem with single-sided impact assessments
- Moving decisions to a technical level is not the solution
- Political context of Better Regulation
We approve the proposal to promote the reintroduction of wolves in the forest to improve the diversity of our ecosystem, provided we build fences around sheep flocks.
Our impact assessment found that building fences around sheep flocks would be too costly hence not worth doing. Sorry...
## CBA in European policy context

<table>
<thead>
<tr>
<th>Costs</th>
<th>Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Easy to quantify</td>
<td>Difficult to quantify</td>
</tr>
<tr>
<td>Immediate</td>
<td>Long-term</td>
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<tr>
<td>Small number of participants</td>
<td>Large groups</td>
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Regulation is not bad for growth

Unit Cost of Financial Intermediation

Overreliance on the Level 2 process

Level 1
- Framework legislation (directive or regulation)
- Proposed by Commission, adopted by Parliament and Council

Level 2
- Secondary legislation (regulation or directive) to specified measures from Level 1
- Drafted by the Commission (DA/IA) or ESAs (BTS), adopted by the Commission

Level 3
- Implementing measures (non-binding guidelines & enhanced cooperation), FAQs
- Issued by ESAs

Level 4
Political context

- Stronger focus on impact assessments
- More “transparency” and asymmetries
- Stronger threat to withdraw legislation
- REFIT and Work Programme as political tools
Accept that impact assessments are only a tool for assisting decision-making, instead of putting the burden of proof on those who want to amend rules.

Invest in genuine citizen and stakeholder input, beyond putting documents on obscure websites.

Stop the blanket exemptions for SMEs.

Respect diversity in member states; stop the war on gold-plating as it might be helpful for negotiations with countries who seek a new deal with the EU.