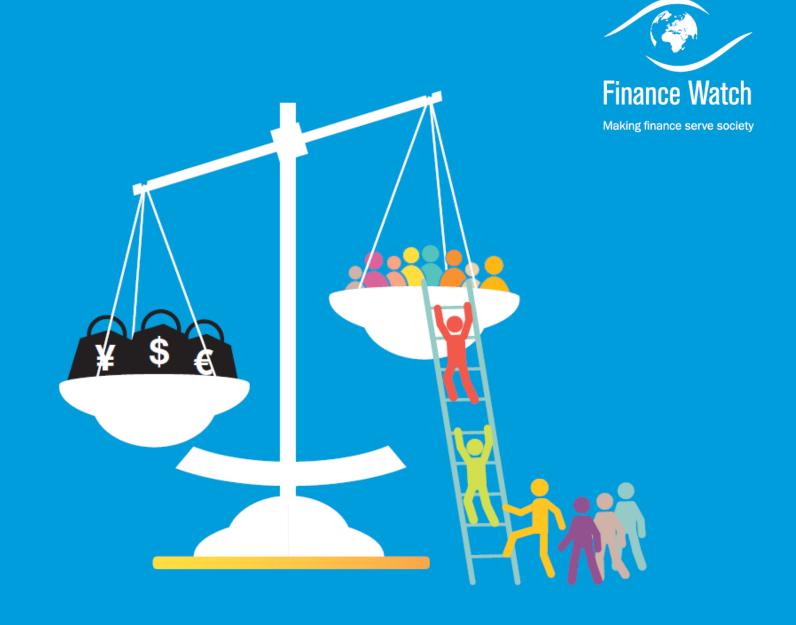


Better Regulation can be so much better

19 October 2015

Joost Mulder, Finance Watch



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

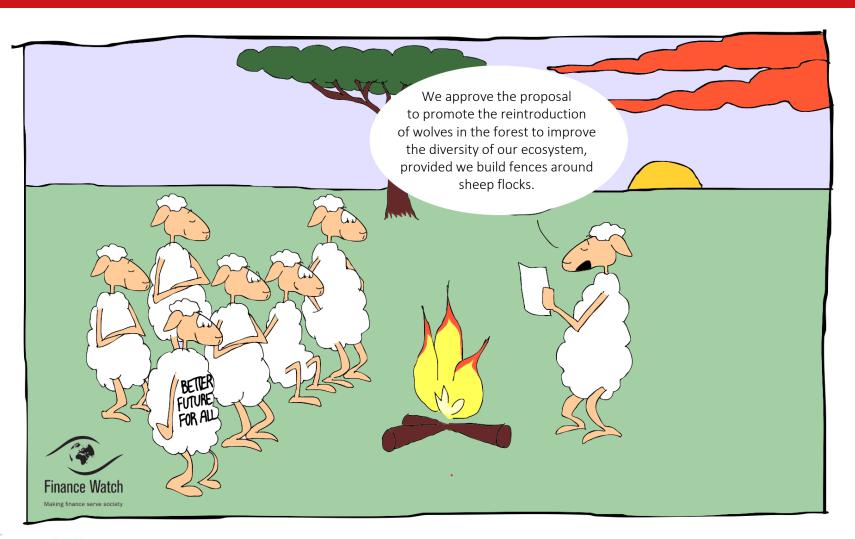


Agenda for this presentation

- The problem with single-sided impact assessments
- Moving decisions to a technical level is not the solution
- Political context of Better Regulation

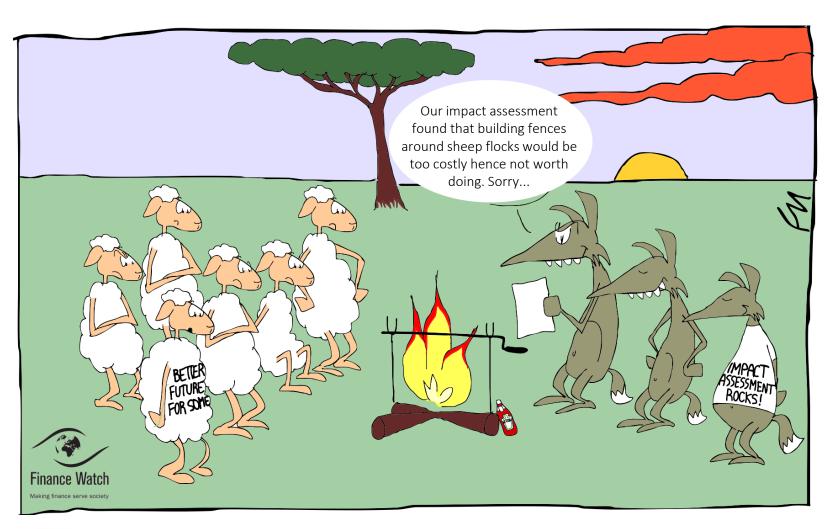


BETTER REGULATION: BETTER FOR WHOM?





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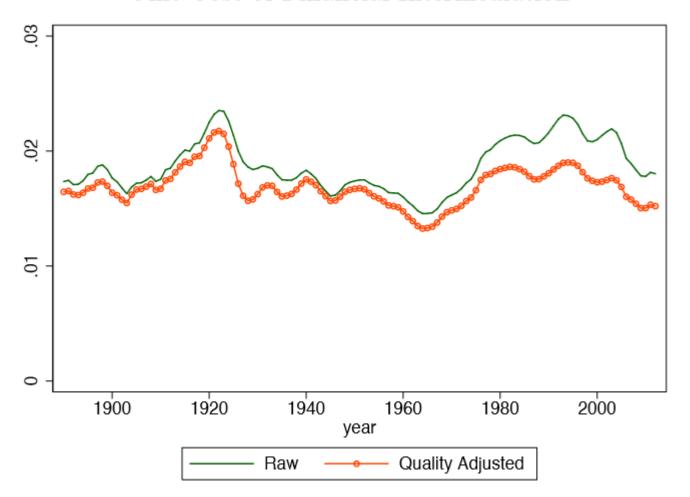
CBA in European policy context

Costs	Benefits
Easy to quantify	Difficult to quantify
Immediate	Long-term
Small number of participants	Large groups



Regulation is not bad for growth

Unit Cost of Financial Intermediation



BETTER WATCHDOG

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



Recommendations

- 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





www.betterregwatch.eu



www.finance-watch.org