



EUROPEAN COMMISSION

High Level Group of Independent Stakeholders on Administrative Burdens

OPINION OF THE HIGH LEVEL GROUP

Subject: Stakeholder consultation on Smart Regulation

I. Background

- (1) The High Level Group of Independent Stakeholders on Administrative Burdens (HLG) was set up to advise the European Commission with regard to the Action Programme for Reducing Administrative Burdens in the European Union.¹ The aim of the Commission is to reduce administrative burdens on businesses arising from EU legislation by 25 % by 2012. During its current mandate the HLG has provided the Commission with extensive advice on administrative burden reduction for all priority areas covered by the Action Programme as well as on various aspects of better regulation in the context of administrative burdens.²
- (2) On 23 April 2010 the Commission has initiated a stakeholder consultation on Smart Regulation which aims to collect input for a Communication which the Commission will produce on Smart Regulation in autumn this year. The Communication will present the Commission's priorities for Smart Regulation, as announced in the President's political guidelines of autumn 2009.
- (3) The first part of the consultation is entitled "Improving existing legislation" and deals with the Commission's efforts on reducing administrative burdens for businesses, simplifying legislation and ex-post evaluation. In this part the Commission asks stakeholders for their views on whether there are more effective ways of improving existing legislation, what can be done to ensure that businesses feel the benefits of the current programmes, which good practices of ex-post evaluation they are aware of and which policy sectors should be subject to a pilot policy evaluation?
- (4) The second part entitled "Making the most of new initiatives" deals with the Commission's impact assessment system and states that the Commission considers its integrated approach "the most appropriate way of ensuring the right basis for informed policy making". In this part the Commission asks stakeholders on which specific issues in the impact assessments the Commission should reinforce its analysis, how the assessment of social impacts can be improved, how stakeholders' awareness of and

¹ Cf. Art. 2 of Commission Decision of 31 August 2007 – C(2007)4063

² All documents are published on the HLG's website: http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/index_en.htm

participation in consultations can be improved and how it can be ensured that all institutions and Member States act together.

- (5) The consultation ran until 25 June 2010 as an internet consultation open to all stakeholders. According to a preliminary screening the Commission has received about 70 responses. Of these, about 70 % were submitted by registered or non-registered organisations including business organisations, social partners and non-governmental organisations, about 25 % by public authorities, and about 5 % by citizens. Contributions were received from 17 different Member States as well as from Norway and the US. Among others, contributions were received by the national regulatory control councils³, BEUC, BusinessEurope, the European Environmental Bureau, the European Policy Centre, ETUC and the Swedish Federation of Business Owners (Företagarna); several members (and observers) of the HLG have been involved in some of these contributions. The HLG secretariat provided the group with an overview of the contributions (see annex), which are all published on the Commission's website.⁴
- (6) During its last meeting on 20 May 2010 the HLG decided to discuss the issue of smart regulation on the basis of the contributions received for the consultation. The HLG appointed Mr. Mollerup as reporting member for the discussion and the current opinion.

II. General comments

- (7) The HLG welcomes the consultation of stakeholders by the Commission on its smart regulation agenda. In the HLG's view the significant number of contributions shows that stakeholders appreciate the opportunity to contribute to the advancement of the smart regulation approach. Furthermore, the contributions show that stakeholders feel the imminent importance of smart regulation for their daily business / lives. Therefore, the HLG is of the view that the Commission should continue to attach a high political priority to smart regulation and even intensify its efforts on delivering smart regulation for the European citizens, the public administration and businesses. The feedback to the consultation encompasses ideas on how the current approach can be improved. In the HLG's view the Commission should thoroughly consider these ideas.
- (8) In view of the progress already achieved in reducing administrative burdens for businesses, the HLG is of the view that this issue should remain an important element of the smart regulation agenda. Although a number of significant proposals are still pending in Parliament or Council, and other measures still need to be implemented in the Member States, the HLG calls upon the Commission to step up its communication efforts on this file, in order to show that the EU addresses the stakeholders' concerns about bureaucratic legislation. An important element in intensified communication efforts should be the need for coordinated efforts for a comprehensive and quick implementation of administrative burden reduction measures. In the HLG's view it is

³ *Adviescollege Toetsing Administratieve Lasten (ACTAL), Nationaler Normenkontrollrat (NKR), the Swedish Better Regulation Council (Regelrådet), Regulatory Policy Committee (RPC)*

⁴ Cf. http://ec.europa.eu/governance/better_regulation/smart_regulation/contributions_en.htm

essential to keep up the pressure on all players on the European, national, regional and local level to deliver on their administrative burden reduction commitments within their respective responsibilities.

- (9) Since the consultation is meant to provide input to the Commission's autumn communication, the HLG will focus on some key points that can be found in the stakeholders' contributions. Within the short timeframe after the close of the consultation, it was not possible to deliver a detailed analysis of the contributions. In its previous meetings the HLG has already discussed two papers related to smart regulation with a focus on the reduction of administrative burdens. Both papers, the 'Decalogue for Smart Regulation' prepared by Mr Illy and the 'Administrative Burden Reduction Checklist' prepared by Mr Mollerup and Mr Telicka, are attached to this opinion.

III. Key points in contributions to the consultation

- (10) Concerning the simplification and administrative burden reduction programmes, stakeholders generally appreciate the ongoing efforts, but call for further improvements. In this context issues such as speeding up the legislative process for proposals in the context of smart regulation, involving stakeholders more regularly and more systematically in the drafting of regulatory proposals, addressing the irritation factors, extending the partial measurement to a full scale measurement of administrative burdens, adopting a net reduction target and including compliance costs are frequently mentioned in the contributions. On the other hand, some contributions argue that the current approach would sometimes put too much emphasis on a healthy business environment at the expense of social, environmental or other key objectives.⁵
- (11) With respect to the question on how it could be ensured that businesses feel the benefits of the programmes, an enhanced focus throughout the policy-making process on the end-user as well as systematic "reality checks" with a number of companies on whether the reductions obtained will make everyday life easier are suggested. Likewise it is argued that an extension to compliance costs would make it easier for businesses to feel differences. Moreover, it is suggested to invite stakeholders to name their top-irritant legal obligation and how to simplify it. Further suggestions concern sunset clauses, common commencement dates and the aim of legal certainty. In addition, a sound public relations strategy both quantifying the cost savings for small businesses and explaining how future legislation undergoes rigorous assessments is recommended.
- (12) A more practical suggestion is that the Commission should send MEPs a list of proposals drafted in the framework of the Action Programme to reduce administrative burdens, together with an explanation of what this programme is and what it means for small businesses.
- (13) Concerning new initiatives, stakeholders likewise appreciate the essential improvements implemented by the Commission's impact assessment system. In this

⁵ Cf. submissions by EEB, ETUC and national trade unions, Smoke Free Partnership, ECL, EPHA.

context issues such as the call for more independence of the Impact Assessment Board (IAB) or an increased use of external expertise, the potential for improving the quality of impact assessments (e.g. with respect to administrative burdens, the SME test, social or environmental impacts), the possibility to consult on draft impact assessments, the need for an update of impact assessments throughout the policy-making process when substantial amendments are proposed in Parliament and Council as well as the format and timing of consultations are mentioned.

- (14) A contribution by the Danish government calls for tougher consequences of negative opinions of the IAB, e.g. that negative opinions would necessitate oral procedure in the College of Commissioners. The same contribution also emphasises the importance of strengthening ownership for the smart regulation agenda across the Commission and across the different Council formations.
- (15) Some suggestions for policy sectors that could be subject to a pilot policy evaluation refer in a rather general way to areas such as tax law, company law, internal market, pharmaceuticals, financial services, statistics, transport, structural funds, the agri-food sector, employment or environment. More specific proposals include waste requirements and waste shipment, water quality, habitat and bird protection, emissions trading, biotech industry, car industry, high-tech consumer electronics industry, audio-visual media services, the services directive, capital market regulation or chemicals regulation. With respect to the latter, it is worth mentioning that contributions both from environmental⁶ and health organisations and from the chemical industry suggest REACH as a policy sector for a pilot policy evaluation.
- (16) Stakeholders acknowledge that the Commission has made progress with informing registered stakeholders automatically, and suggest that the Commission representation in the Member States could develop their own lists including automatic alerts as well. Stakeholders also emphasise the importance of feedback on consultations. In this respect they suggest an automatic transmission of the Commission's summary report and response. They call for clear and neutral questions within the consultation documents. There is no general agreement on the best way of consulting stakeholders. Some argue that stakeholder meetings and public hearings are sometimes more efficient and interactive than internet consultations; however, this also depends on the planning stage of proposals. Many contributions welcome internet consultations at an early stage. The Enterprise Europe Network as well as the European Business Test Panel are quoted as positive examples for consultation of stakeholders.
- (17) The UK government points out that while individual legislative proposals may look desirable from the narrow perspective of solving a particular problem, collectively they could stifle the smart, sustainable and inclusive growth that are the objectives of the Europe 2020 strategy. The government thus urges the Commission to take a robust approach in questioning legislative proposals that impose burdens on business, with a presumption that they should not be pursued unless there is an overwhelming case for them.

⁶ Cf. contribution by EEB, response to question 4, http://ec.europa.eu/governance/better_regulation/smart_regulation/docs/fed_environmental_citizens_organisations_eeb_en.pdf

- (18) The HLG endeavours to have a closer look at all contributions before its autumn meeting, in order to see, if some of the contributions can provide additional input for the HLG's work. In particular, the HLG will examine whether some of the suggestions for the administrative burden reduction programme or best practice examples provided in the contributions can be taken up for its work.

IV. Conclusions

- (19) *The HLG welcomes the support for the Commission's efforts to reduce administrative burdens for businesses and simplify legislation as evidenced by an overwhelming majority of the contributions to the stakeholder consultation on smart regulation. In addition, it is encouraging that some stakeholders from the industry also provide positive examples for EU legislation or national best practice.*⁷
- (20) *The HLG shares the view that the better regulation approach initiated in particular by the last Commission has been a good start, but more needs to be done on all levels and by the different players. Thus, legislation both at EU and national level (and below) needs to be improved in terms of volume, simplicity, quality and workability.*⁸
- (21) *The HLG is of the view that the European Parliament and the Council should turn particular attention on ensuring that administrative burdens are kept to a minimum and no additional unnecessary burdens are put on businesses in the legislative process. It is essential for businesses that simplification and administrative burden reduction elements are not compromised or even lost in the legislative process. Therefore, the HLG would like to highlight those proposals that stress the need for both Parliament and Council to be aware of the possible negative consequences in terms of administrative burdens when proposing changes to the legislative acts put before them. The HLG would welcome an opportunity to be involved in a direct dialogue with representatives of Parliament and Council about the administrative burden reduction agenda.*
- (22) *In the HLG's view the Commission should thoroughly examine the contributions received via this consultation, and in particular the suggestions for the future development of the simplification and administrative burden reduction programmes. In this context, the HLG calls upon the Commission to closely monitor new developments in Member States to see whether these developments can be transferred to the European level.*
- (23) *The HLG would like the Commission to pay particular attention to a number of the suggestions made by the national regulatory control councils. In particular, a proportional method of measuring administrative burdens stemming from all EU regulation should be developed and the Commission should commit itself to a net*

⁷ E.g. the revision of the Variations Regulation, MindLab-initiative in Denmark (www.mind-lab.dk/en)

⁸ Cf. contribution by Cefic, p. 1.

reduction target⁹ in order to ensure that new burdensome legislation does not nullify the reduction efforts in other areas.

- (24) *Regarding the work of the Impact Assessment Board the HLG would welcome a commitment to carry out proportionate impact assessments in all cases as a matter of principle (including implementing legislation) as well as a commitment to make all impact assessments public – even when a proposal is sent back for further scrutiny. In the HLG's opinion publicity about the impact assessments can have a strong positive effect when it comes to drafting smarter regulation. Finally, the HLG would welcome the use by the IAB of independent external expert scrutiny of some of the legislative proposals, and the HLG would welcome the opportunity to intensify its cooperation with the IAB.*
- (25) *Particular attention should also be turned to the responses as to how it can be ensured that businesses feel the positive effects of the programmes. An interesting idea in this respect is to perform a 'reality check' with a number of companies on whether the reductions obtained will make everyday life easier as intended which could be part of the increased efforts for ex-post evaluation. This might also provide positive examples of how everyday life has become easier that could be used for communication efforts.*
- (26) *Improved communication about the smarter regulation agenda should continue to address the so-called irritants or perceived burdens, as perception - in the view of the HLG - plays a major role in the assessment by businesses of the EU's ability to reduce bureaucracy and red tape.*
- (27) *It is important to note that stakeholders acknowledge that changes take time until they can be felt 'on the ground'. Thus, not only should the EU-level strive for speeding up its procedures and establish a real fast-track procedure, but likewise should Member States strive for fast-track procedures for the transposition or implementation of EU legislation with simplification and administrative burden reduction potential.*
- (28) *For the success of the administrative burden reduction agenda a common commitment to this agenda is indispensable. The HLG therefore welcomes the commitment expressed by some governments to work on strengthening the ownership for the smart regulation agenda for the different Council formations,¹⁰ and calls upon the Commission to continue on working on strengthening the ownership for the smart regulation agenda across the Commission.*
- (29) *In the HLG's view the Commission should review the suggestions for policy sectors that could be subject to a pilot policy evaluation. In particular the more specific suggestions would merit a more detailed examination.*
- (30) *Concerning stakeholder consultations, the HLG supports the suggestion that the Commission's summary report and response should automatically be transmitted to those who have participated in the consultation. Other suggestions such as an extension of the consultation period or newsletter and alert services for new initiatives and consultations should be closely examined.*

⁹ Mr Hontelez disagrees with the net target.

¹⁰ Cf. contribution by the Ministry of Economic and Business Affairs Denmark

Brussels, 8 July 2010

Annexes:

1. Decalogue for Smart Regulation

(http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/files/abr_hlg_121109_decatalogue_for_br_en.pdf)

2. An Administrative Burden Reduction Checklist

(http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/files/abr_hlg_101209_checklist_mollerup_and_telicka_en.pdf)

3. Overview of the contributions to the stakeholder consultation on Smart Regulation, for individual contributions cf. Commission's website:

http://ec.europa.eu/governance/better_regulation/smart_regulation/contributions_en.htm

“Decalogue for Smart Regulation”

The Decalogue is meant to provide a checklist for integrating better regulation principles into the process of regulating at EU level. It is not intended to be exhaustive, but to give a quick overview of the most important threads when preparing “smart” regulation.¹¹

- 1) **Smart Solution.** Legislation may not always be the best solution to a specific problem. Thus, alternatives to legislation (such as providing clear guidance or best practice examples) should be considered first, in order to choose the smartest solution.
- 2) **Cost / Benefit.** For each alternative the correspondent costs and benefits should be evaluated. The benefits must outweigh the costs, and between different options the one with the best ratio should be chosen.
- 3) **Clarity.** The text of the regulation should be drafted in a clear language so as to guarantee an unequivocal interpretation in accordance with the objective of the legislation. Necessary forms, templates, guidelines etc. should likewise be as clear as possible.
- 4) **Conciseness and Comprehensiveness.** The text should be as short as reasonably possible, while containing all the elements necessary for the interpretation and the implementation of the legislation. In appropriate cases, guidance or best practice examples should be provided.
- 5) **Commencement and update.** To the extent possible the commencement date of the implementation of different regulations affecting the same / related sectors or branches should be aligned. Regular reviews should be foreseen in order to ensure that the regulation remains up to date and reflects real needs.
- 6) **Collateral damages.** Each regulation should affect only the people and/or entities concerned by its contents and objectives; any “collateral damages”, e.g. not intended consequences for certain groups or cases, should ideally be avoided.
- 7) **Think Small First (Proportionality).** Each measure should be proportional to the dimension of the subject or of the phenomenon it concerns. In case of particular effects on certain subjects or cases (for instance on smaller entities) exemptions, thresholds, lump sum solutions, accurately adapted regimes etc. should be foreseen.
- 8) **Think Local First (Subsidiarity).** Before thinking about EU-wide solutions, the necessity of action on EU level must be demonstrated. Not every problem in Europe needs to be a task for the EU.
- 9) **Only Once and One Stop Shop.** Regulators should strive to require only essential information to be provided by people and / or entities concerned, and to require this information only once. In addition, authorities should strive to provide one location where all necessary documentation can be accessed and completed.
- 10) **Promoting e-enabling and e-government solutions.** E-government is an essential tool to limit the administrative burdens for people and / or entities concerned by regulation, if adapted to the users’ needs. Regulation should facilitate e-government solutions and promote e-enabling as far as possible.

Stockholm, 12 November 2009

High Level Group of Independent Stakeholders on Administrative Burdens

¹¹ President Barroso announced at a press conference with Vice-President Verheugen and Dr. Stoiber on 18 September that he would “make smart regulation a ‘Leitmotif’ “.

Annex 2: **An Administrative Burden Reduction Check List**
(presented by HLG members Paul Mollerup and Pavel Telička)

Based on the experience of the High Level Group so far a check list for EU legislators could be an important tool when drafting new or revised legislation. The list should ensure that the following questions are answered as part of the legislative drafting process:

- i. Why is this new legislation necessary compared to the status quo?
- ii. Could a better implementation of the existing legislation obtain the desired results?
- iii. Can the information this legislation sets out to gather be collected in other ways or is similar information already collected for other purposes?
- iv. Are the information requests contained in this legislation in line with information businesses already gather for their own purposes or can the existing data in businesses be used instead?
- v. Can the information being collected today be used by the EU in a more efficient manner than is currently the case?
- vi. Is the current legislation being enforced so that businesses supply the information already demanded by them or is the problem related to lack of proper enforcement?
- vii. Has this piece of legislation been revised recently in ways that affect the information obligations of businesses? (If yes – is it really necessary to impose new costs on businesses that have recently incurred costs in changing their reporting routines to the recent changes in the same legal act?)
- viii. Can the commencement date of this legal act be synchronized with that of a number of other legal acts so that businesses experience a common commencement date for all new legislation so that changes to information obligation routines can be made at fixed regular intervals and not have to be made continuously?
- ix. Is this act coherent with other legal acts so that reporting formats and content can be reused across various legal acts easing the burden on businesses?
- x. Has the legal act been based on a risk based approach meaning that information obligations are only imposed in those areas with a high perceived risk, whereas low risk areas are left out?
- xi. Have relevant stakeholders – and specifically business representatives – been consulted during the drafting process – and have their suggestions been taken into account?
- xii. Has a method of information collation that involves new technology – e.g. in digital form – been considered in order to limit the burden of the information obligation on businesses?

Annex 3:

Overview of the contributions to the public consultation on "Smart Regulation" for the HLG AB provided by the HLG AB Secretariat¹²

Introduction

On 23 April 2010 the Commission has initiated a stakeholder consultation on Smart Regulation which aims to collect input for a Communication which the Commission will produce on Smart Regulation in autumn this year. The Communication will present the Commission's priorities for Smart Regulation, as announced in the President's political guidelines of autumn 2009.

The consultation ran until 25 June 2010 as an internet consultation open to all stakeholders. According to a preliminary screening the Commission has received about 70 responses. Of these, about 70 % were submitted by registered or non-registered organisations including business organisations, social partners and non-governmental organisations, about 25 % by public authorities, and about 5 % by citizens. Contributions were received from 17 different Member States as well as from Norway and the US. Among others, contributions were received by the national regulatory control councils¹³, BEUC, BusinessEurope, the European Environmental Bureau, the European Policy Centre, ETUC and the Swedish Federation of Business Owners (Företagarna) which are mentioned below. Several members (and observers) of the HLG have been involved in some of these contributions.

Contributions by source category

For detailed content of the contributions, please refer to the attached list of contributions and the Commission's website listed below.

Public authorities generally welcome the Commission's smart regulation agenda and ask for further improvements in certain respects. Some refer to their experience with the better regulation agenda, and ask the Commission to consider taking new developments on national or regional level into account when further developing the smart regulation agenda. Contributions for the consultation have been received by public authorities in Belgium, Denmark, Estonia, Germany, Ireland, Malta, the Netherlands, Norway, Portugal, Romania, Spain, Sweden and the UK.

The independent national regulatory control councils (ACTAL [NL], NKR [DE], Regelrådet [SE] and RPC [UK]) also welcome that the new Commission continues and expands the better regulation agenda of the previous Commission, but argue that the approach could even be more ambitious to enable a smart regulation mindset within the Commission and maximise

¹² Please note that this document does not reflect a position by the Commission. All contributions are published on the Commission's website listed below, and the Commission will produce a summary report and its response.

¹³ *Adviescollege Toetsing Administratieve Lasten (ACTAL), Nationaler Normenkontrollrat (NKR), the Swedish Better Regulation Council (Regelrådet), Regulatory Policy Committee (RPC)*

the benefits of smart regulation for businesses, the public sector, consumers and other stakeholders.

Among the business organisations, which form the largest group of contributions (e.g. BusinessEurope, Cefic, Eurochambers, Företagarna, ZDH), the support for the smart regulation agenda is also very strong, although they generally ask for more, e.g. extending the measurement to further acts, speeding up the legislative process or addressing the irritation factors. Some other organisations such as environmental (EEB) or health organisations, ETUC and national trade unions are more critical of the smart regulation agenda, and in particular the administrative burden reduction approach; they argue that the approach could undermine achieving social, environmental and other key objectives. BEUC voices its support for the smart regulation agenda, but points out that the reduction of administrative burdens must not undermine the political rationale of a legislative act.

Academic and policy bodies such as the the European Policy Center voice their support for the smart regulation agenda and transmit suggestions for further improvements. Inter alia the EPC would like to see the Commission playing a more active part when it comes to convincing the other institutions to follow the Smart Regulation agenda.

Contributions received by citizens form the smallest group. One contribution suggests e.g. the car industry as a policy sector that could be subject to a pilot policy evaluation.

List of contributions

(http://ec.europa.eu/governance/better_regulation/smart_regulation/contributions_en.htm)

Individual contributions - Non-registered organisations

- Board of Swedish Industry and Commerce - NNR
- Bureau de Normalisation de l'Aéronautique et de l'Espace (France)
- Chartered Institute of Personnel and Development - CIPD
- Council for Healthcare Regulatory Excellence – CHRE (UK)
- Danish Confederation of Professionals - FTF
- Danish Confederation of Trade Unions
- Dutch confederations of Employers and Industry VNO-NCW and SME-Netherlands
- Federation of Small Businesses (UK)
- Företagarna, the Swedish Federation of Business Owners
- Institute of Directors (UK)
- Royal Society of Chemistry (UK)
- Scottish Water (UK)
- Studierendengruppe der Wirtschaftsuniversität Wien (Austria)
- US Chamber of Commerce
- Vereinigung der Bayerischen Wirtschaft - VDB
- Westdeutscher Handwerkskammertag (Germany)

Registered organisations

- Association of Chartered Certified Accountants - ACCA (UK)
- Association of European Cancer League
- Association of the European Self-Medication Industry - AESGP
- British Chambers of Commerce
- BusinessEurope (Confederation of European Business)
- Carrefour Group (France)
- Confederation of European Community Cigarette Manufacturers - CECCM (Germany)
- Consumers Protection Centre - KEPKA
- Danish Chamber of Commerce
- EPBA, Recharge, TechAmerica and DigitalEurope
- Eurochambres (Association of European Chambers of Commerce and Industry)
- EuropaBio
- European boating industry
- European Chemical Industry Council - Cefic
- European Consumers' Organisation - BEUC
- European Crop Protection Association – ECPA
- European Policy Centre - ECP
- European Private Equity and Venture Capital Association - EVCA
- European Public Health Alliance - EPHA
- European Trade Union Confederation - ETUC
- Federation of Enterprises in Belgium - FEB
- Federation of Environmental Citizens Organisations - EEB
- Institute of Chartered Accountants in England and Wales – ICAEW
- l'Union des Entreprises Luxembourgeoises - UEL
- L'Institut Maçonique Européen de la Grande Loge Féminine de France
- Mario Andrea Valori (Italy)
- Smoke Free Partnership - SFP
- Swedish Trade Union Confederation - LO, Swedish Confederation of Professional Employees - TCO and Swedish Confederation of Professional Associations - Saco The Netherlands Chamber of Commerce
- Verband der Chemischen Industrie e.V. (Germany)
- Wirtschaftskammer Österreich - WKÖ (Austrian Federal Economic Chamber)
- Zentralen Kreditausschusses - ZKA (Germany)
- Zentralverband des Deutschen Handwerks - ZDH (Confederation of Skilled Crafts and Small Businesses) (Germany)

Public authorities

- Actal (The Netherlands), Nationaler Normenkontrollrat (Germany), Regelrådet (Sweden) and Regulatory Policy Committee (UK)
- Bayerische Staatskanzlei (Germany)
- Better Regulation Executive - BIS (UK)
- Brønnøysund Register Centre – Altinn (Norway)
- Bruxelles Environnement de la Région de Bruxelles-Capitale (Belgium)
- Direcção-Geral do Consumidor (Portugal)
- Dutch government
- Dutch Ministry of the Interior and Kingdom Relations and other Dutch ministries
- Flemish Government, Department of General Affairs (Belgium)
- Irish Government Departments
- Ministry of Economic Affairs and Communications (Estonia)
- Ministry of economic and business affairs (Denmark)
- Ministry of Enterprise, Energy and Communications (Sweden)
- Ministry of the Presidency (Spain)
- Office of the Prime Minister (Malta)
- Portuguese Government
- Romanian central public authorities
- Swedish Agency for Economic and Regional Growth

Individual contributions - Citizens

- Heuer, Klaus-Peter
- Jover Ribalta, Carlota
- Puder, Marc
- Toma, Ioana-Noemy