

Overview of the contributions to the public consultation on "Smart Regulation" for the HLG AB provided by the HLG AB Secretariat¹

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 councils², 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 the benefits of smart regulation for businesses, the public sector, consumers and other stakeholders.

¹ 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.

² *Adviescollege Toetsing Administratieve Lasten (ACTAL), Nationaler Normenkontrollrat (NKR), the Swedish Better Regulation Council (Regelrådet), Regulatory Policy Committee (RPC)*

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 Professionels - 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 Maçonnique 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