



EUROPEAN COMMISSION

High Level Group of Independent Stakeholders on Administrative Burdens

OPINION OF THE HIGH LEVEL GROUP

Subject: Stakeholders' suggestions ('offline-consultation') – VIII

I. Background

- (1) The High Level Group of Independent Stakeholders on Administrative Burdens (HLG) was commissioned to *inter alia* advise the Commission on suggestions for administrative burden reduction and simplification measures. In addition to the suggestions by consultants, via the online consultation or during local workshops with businesses in Member States, the HLG members and the Commission receive reports or letters from external stakeholders with reduction or simplification suggestions. These ideas have been labelled "offline suggestions".
- (2) With the start of the new mandate of the HLG¹ Mr. Côte-Real Goucha was appointed coordinating reporting member for these offline suggestions. The HLG works on these suggestions in the following way: firstly, the secretariat assesses the incoming proposals with the help of those Directorates-General of the Commission that are competent in the subject matter. At the same time suggestions which do not concern European legislation at all are generally filtered out. Secondly, the group's reporting members look at suggestions in their respective priority area for which first reactions from Commission services are available. The result of this process is an opinion of the group addressed to the Commission.
- (3) The HLG calls upon the college of Commissioners and Commission services to take all necessary steps to ensure that (legislative) burden reduction and simplification proposals are introduced in time. Likewise, the Member States should strive for further reductions of unnecessary administrative burden and simplification. The HLG wishes to underline that achieving the aim of a reduction of administrative burden by 25 % by 2012 will only be feasible with as many concrete reduction measures as possible. At the same time the efforts to reduce unnecessary burdens for businesses should be continued beyond the expiration of the Action Programme for Reducing Administrative Burdens in the EU – both on EU-level as well as on national and sub-national levels.
- (4) So far the HLG has received several hundred ideas from stakeholders. Most were integrated into sectoral opinions adopted for each of the 13 priority areas in scope of

¹ Commission Decision of 17 August 2010 (2010/C 223/03)

the Action Programme for Reducing Administrative Burdens in the EU.² Suggestions received after the adoption of the respective sectoral opinions are dealt with in offline opinions. Under its old mandate the HLG has adopted seven opinions on offline suggestions in its meetings of 18 September 2008, 20 January, 16 April, 7 July, 12 November 2009, 28 January 2010 and 10 March 2011³. Within this opinion most suggestions have been taken from contributions to the Commission's consultation on Smart Regulation.⁴

II. Suggestions by Area

- (5) *Environment – boating industry / waste requirements.* In suggestion 1 the stakeholder complains about varying interpretations given by Member States to a number of EU waste directives⁵. Enterprises are required to conform to different standards in different Member States. Meeting the waste requirements for batteries, packaging and electrical and electronic equipment in the EU-27 would mean up to 81 registration procedures per company in order to sell 3 (or less) different products. Furthermore, in many Member States a firm must have a locally registered company (which SMES typically do not have) in order to be listed in the producer's registers. Thus, these SMEs usually rely on agents/distributors which would cause additional costs. Moreover, in some countries, there is a minimum volume to be placed on the market in order to register as producer on the national register, which also prevents the registration. The stakeholder suggests simplifying current requirements and making the national producer's registers interoperational in order to allow producers that have registered in one national register, and are complying with the rules of that country, to place their products across the EU internal market without additional administrative burden. With respect to the WEEE-Directive the Commission has proposed⁶ an approach based on an EU definition of "producer", implying one EU-wide registration, coupled with interoperability and harmonised registration requirements, in order to resolve the issues mentioned by the stakeholder. Member States, however, favour a national producer definition. The Commission is not aware of similar issues resulting from the Packaging Directive, but does not exclude similar issues with the Batteries Directive. Given the difficult discussions on WEEE, the Commission proposes to focus on these discussions for the moment, since solutions found for WEEE could potentially be adapted to the benefit of reducing burdens arising under the other two

² Cf. the Intermediate Report of the HLG adopted at its 17 September 2009 meeting: http://ec.europa.eu/enterprise/policies/better-regulation/files/180909_hlg_ab__intermediate_report_incl_annexes_en.pdf

³ Cf. http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/index_en.htm

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

⁵ e.g. Batteries Directive 2006/66/EC, Waste Packaging Directive 94/62/EC, Directive 2002/96/EC on waste electrical and electronic equipment (WEEE)

⁶ cf. COM(2008)810

directives. *The HLG recalls its second opinion on environment*⁷ where the Group had encouraged the Commission to work with Member States to find solutions that keep the administrative burdens at a minimum level for both businesses and Member States. The Group supports the stakeholder's call for uniform interpretations of different directives, in order to ensure a consistent application. In this respect the suggested simplification of the requirements could also contribute to a more consistent application. Furthermore, the Group agrees with the Commission's suggestion to focus on the WEEE discussions first. Once solutions have been found for WEEE, the Commission should examine whether these solutions can be adapted to the other two directives with a view to further reduce the burdens. Finally, the HLG calls upon the Member States and the Commission to organise an exchange of information on, and – in due course – of best practices in implementing the solutions found for WEEE.

- (6) *Environment – biocidal products.* In suggestion 2 the stakeholder argues that the existing requirements of the Directive on Biocidal Products⁸ are too burdensome, complex and costly, in particular since the two-stage approval procedure from the Plant Protection Products Directive⁹ had been transferred to the Directive on Biocidal Products. The stakeholder asks for a comprehensive evaluation of the European legislation in this area taking thorough account of an impact study¹⁰ on the implementation of the directive with the aim of simplifying the complex procedures in Member States. After the political agreement in Council in December 2010 the second reading of the Commission's June 2009 proposal in the Parliament is scheduled for September 2011.¹¹ On the impacts the Commission refers to its comprehensive impact assessment and the continuous dialogue with industry representatives. Since the legislative process is not yet finalised, the Commission does not support the stakeholder's request for an evaluation, but refers to provisions for reports and reviews in the draft legislation. *The HLG has dealt with similar suggestions in its second opinion on environment.*¹² It recalls that the Commission's proposal has been estimated at reducing administrative burden by about € 68m. per year despite a proposed extension of the scope, thus addressing some of the concerns stated in the above mentioned impact study. The HLG notes that in the first reading both Council and Parliament have proposed an extension to further types of biocidal products. In the HLG's view the impacts of these proposed further extensions, in particular for SMEs, should be closely examined.
- (7) *Environment – Waste Electrical and Electronic Equipment (WEEE).* In suggestion 3 a stakeholder complains about burdensome (monthly) notification requirements and

⁷ cf. paragraph 16 of the HLG's second opinion on environment, available at http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/files/2010_05_20_2nd_opinion_env_hlg_meeting_en.pdf

⁸ Directive 98/8/EC of the European Parliament and of the Council of 16 February 1998 concerning the placing of biocidal products on the market

⁹ Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market

¹⁰ Cf. <http://ec.europa.eu/environment/biocides/study.htm>

¹¹ Cf. http://ec.europa.eu/prelex/detail_dossier_real.cfm?CL=en&DosId=198337

¹² Cf. footnote 7, paragraph 27

significant registration fees for electrical appliances which would in particular hamper small trade businesses. Additional (separate) registrations were required for each individual Member State, which would multiply the burden for businesses, and in particular small businesses. The stakeholder refers to the example of the solution found for batteries where only one annual notification of all batteries sold was required. He suggests a lump sum payment on waste disposal for the import of electrical appliances in the EU instead of an individual registration of each individual electric appliance in each Member State. According to the Commission the burdens described by the stakeholder stem from the non-harmonised national implementation of the WEEE Directive. With its above mentioned proposal for the recast of the directive the Commission – supported by the Parliament – has suggested ways to remedy this situation with a harmonised approach to the definition of "producer", single registration and interoperability of registers. However, in its political agreement of 14 March 2011 the Council unanimously pleads for a national producer definition and against interoperability. Intensive discussions are expected during the second reading in the European Parliament set to be concluded in late 2011. *The HLG refers to its second opinion quoted above and repeats its call on Commission and Member States to strive for solutions that keep the administrative burdens at a minimum level for both businesses and Member States.*

- (8) *Internal Market – radio and telecommunication terminal equipment.* Suggestion 4 concerns the R&TTE (Radio and Telecommunication Terminal Equipment) Directive.¹³ The stakeholder argues that whilst the alignment to the New Legislative Framework (NLF) requires that administrative burden and cost must be reduced, and the legislation simplified, for the R&TTE Directive a number of additional measures are in the process of being imposed which will only increase the administrative and cost burden to industry, including: (1) the need for translation of compliance documentation into the national language of every member state; (2) the proposal for uploading of technical documentation to a third party location (i.e. central registration); (3) the proposal for a product and/or manufacturer registration scheme under the recast of R&TTE Directive; and (4) abstract references to 'health and safety' even in directives not related to those topics, e.g. the Directive regarding electromagnetic compatibility (EMC Directive¹⁴). According to the Commission the language requirements (1) are differentiated according to the persons for whom different documents are intended, in order to avoid unnecessary burdens for economic operators. Furthermore, they refer to national requirements and do not create new obligations with regard to the current situation. A template for the declaration of conformity (standardised one page document) is to be provided by the revised directive (published in all official languages), possible additional translation effort should be very limited. Points (2) and (3) refer to some options under consideration in order to redress the low level of compliance. The Commission has examined the impacts and consulted the relevant stakeholders and in particular SMEs which will be reflected in the impact assessment. In the case of the EMC Directive (4), the Commission agrees that a reference to health and safety is not necessary, while the R&TTE Directive does include a safety objective. *The HLG calls on the Commission*

¹³ Directive 1999/5/EC of the European Parliament and of the Council of 9 March 1999 on radio equipment and telecommunications terminal equipment and the mutual recognition of their conformity

¹⁴ Directive 2004/108/EC of the European Parliament and of the Council of 15 December 2004 on the approximation of the laws of the Member States relating to electromagnetic compatibility

to keep additional translation effort as limited as possible, and welcomes the provision of short standardised templates. The HLG is of the view that a thorough examination of the (quantified) impacts on administrative burdens is indispensable. Therefore, the Group will come back to this issue once the assessment has been published. The Group welcomes the specific consultation of SMEs for this file which is in line with the Small Business Act.

- (9) *Internal Market – accounting.* In suggestion 5 the stakeholder gives a number of general examples where he believes that the main burdens imposed on companies are. First, he points to overlaps and frequency of reporting, filing and other requirements for different regulatory purposes such as tax, incorporation, employment and statistics. Further burdens could be found in dividend distribution requirements, the implementation of health and safety legislation and returns as well as in the administration of miscellaneous social security programs (calculation, payment and statistical reporting to authorities). An important factor was the insufficient use of e-government solutions. In addition, certain opportunities for further simplification may not be fully exploited as for instance, there is no indication in the EU of a common approach towards XBRL, leading to Member States' piecemeal initiatives and a more complex EU taxonomy. According to the Commission important efforts have been undertaken in the field of EU statistics in order to increase the use of existing information sources for compiling statistics.¹⁵ Furthermore, several Member States have worked on introducing 'single-entry point'-solutions, in order to collect data from enterprises only once both for fiscal and statistical purposes. The Commission supports the idea that companies should be able to fulfil accounting, tax and statistical information obligations with only one set of financial information. Therefore, on accounting, the Commission proposed in 2009 to allow Member States to exempt micro-entities (the largest company group in terms of population) from the EU accounting obligations. On cross-border dividend distribution and fiscal compliance procedures, the Commission adopted a recommendation on withholding tax relief procedures¹⁶ that outlines how Member States could make it easier for investors resident in one Member State to claim entitlements to relief from withholding tax on securities income (mainly dividends and interest) received from another Member State. Concerning XBRL some Member States have developed or are about to develop their own XBRL taxonomies which will sooner or later lead to divergences, also in crucial issues. Thus, an important potential for the reduction of administrative burdens is not fully exploited. *The HLG fully supports the initiatives on EU and national level to foster the use of existing information sources and to promote the development of IT*

¹⁵ Cf. Decision No. 1297/2008/EC, Programme for the Modernisation of European Enterprise and Trade Statistics which foresees measures aiming at increasing the use of administrative and accounting data for statistical purposes and promotes the development of IT tools for more efficient extraction, transmission and treatment of data

¹⁶ C(2009)7924; the recommendation (first one in tax area since approx. 9 years) and the underlying study on its economic impact as well as other background documents are available at: http://ec.europa.eu/internal_market/financial-markets/clearing/compliance_en.htm. The recommendation also suggests measures to eliminate tax barriers for the securities investment activities of financial institutions. This is important because a study by the Commission services shows that at present the costs related to the present reclaim procedures are estimated to a value of €1.09 billion annually whereas the amount of foregone tax relief is estimated at €5.47 billion annually. The Commission also created an expert group on fiscal compliance procedures related to post trading (Tax Barriers Business Advisory Group, T-BAG), cf. http://ec.europa.eu/internal_market/financial-markets/clearing/tbbag_en.htm.

tools for more efficient extraction, transmission and treatment of data. The Group calls upon all concerned to step up efforts for a concrete implementation of the only-once-principle to the widest extent possible. 'Smart' regulation should facilitate e-government solutions and promote e-enabling as far as possible.¹⁷ The Group welcomes the Commission's activities on fiscal compliance procedures including the establishment of the T-BAG expert group¹⁸; in particular, the HLG supports the T-BAG's work on standardising documentation to claim tax relief (today more than 54 different paper documents are necessary) and on electronic filing and documentation. The HLG would appreciate to be informed about the final results of the T-BAG's work. Finally, the HLG shares the stakeholder's concerns on XBRL and calls upon the Commission to make an inventory of the different XBRL practices in the Member States. In the HLG's view the Commission should launch an initiative to streamline all taxonomies that exist or are being developed.

- (10) *Internal Market/Food Safety.* In suggestion 6 the stakeholder argues that overregulation, outdated and misguided regulation leads to higher compliance costs for companies, and points out a number of examples of in his view badly conceived regulation such as legislation determining the frequency with which the windscreen wiper of a tractor should go back and forth, or legislation defining the height, width, and depth of the battery cages for chickens. Furthermore, in his view food safety regulations impossible to implement in the real world were imposed, rules were provided to indicate the amount of noise a lawn mower may produce. According to the Commission the respective legislation¹⁹ on windscreen wipers, noise emissions by equipment used outdoors (including lawnmowers) and battery cages for laying hens was adopted mainly to promote the smooth functioning of the internal market and to avoid unfair competition. The framework directive on noise emissions has furthermore harmonised 10 existing legal instruments.²⁰ On food safety the Commission refers to the 'hygiene package' introduced in 2004; the new regulations merged, harmonised and simplified detailed and complex hygiene requirements previously contained in a number of directives covering the hygiene of foodstuffs and the production and placing on the market of products of animal origin ('from farm to fork'). A report on the application of the hygiene regulations²¹ indicated inter alia that consulted stakeholders considered that the new principles and requirements had a positive impact, while they did not favour an extension of the requirement for HACCP²²-based

¹⁷ Cf. "Decalogue for Smart Regulation" and "An Administrative Burden Checklist", available at the HLG website.

¹⁸ Cf. fn. 16.

¹⁹ Directive 2008/2/EC on the field of vision and windscreen wipers for wheeled agricultural or forestry tractors (codification); (framework) Directive 2000/14/EC on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors; Directive 1999/74/EC laying down minimum standards for the protection of laying hens

²⁰ Cf. http://europa.eu/legislation_summaries/environment/noise_pollution/l28048_en.htm

²¹ Cf. Report from the Commission to the Council and the European Parliament on the experience gained from the application of the hygiene Regulations (EC) No 853-854/2004, COM(2009)403; http://europa.eu/legislation_summaries/food_safety/veterinary_checks_and_food_hygiene/f84001_en.htm

²² Hazard Analysis and Critical Control Point, cf. MEMO/05/498 of 22.12.2005

procedures to food business operators carrying out primary production. The HACCP system requires certain skills and a certain level of administration, but flexibility has been introduced in the hygiene package in order to accommodate the situation of small businesses. In addition, primary producers and retailers (direct sale to the consumers) which represent a lot of the small businesses may replace the system by implementing guides to good practice established by the various food sectors. *The HLG notes that in many cases it has been (certain) stakeholders including businesses who have asked for more (harmonised) regulation in order to ensure fair competition in a well functioning internal market. In some cases this might have led to unnecessary or burdensome regulation. In 2008, for instance, specific marketing standards for 26 types of fruit and vegetables were repealed despite opposition from some in the sector. For legislative proposals the impact assessment guidelines foresee an examination of the proportionality principle with respect to both the scope and the nature of the instrument chosen. The HLG recommends that the Commission performs a check of the necessity and proportionality of existing regulation in cases where stakeholders have put the necessity into question. Any results from these checks might be considered to be published on a website²³ explaining the reasons for the legislation in certain exemplary cases such as the one on the speed of windscreen wipers of tractors. Concerning food safety, the HLG has dealt with suggestions, in particular by small businesses, on the hygiene package before.²⁴ The HLG welcomes simplifications and the flexibility introduced to accommodate the situation of small businesses, and recalls its advice to the Commission and Member States to review the respective legislation based on the think-small-first-principle.*

- (11) *Internal Market – good inspection/enforcement.* In suggestion 7 the stakeholder argues that across the EU, inspection and enforcement practices differ greatly. It would be beneficial to both the functioning of the internal market and the reduction of EU administrative burdens to agree on a number of principles of good inspection and enforcement across the EU. With these principles, competent authorities in Member States would be given greater flexibility to apply ‘new’ practices and tailor their inspections according to risk-based approaches. The potential savings for the EU economy could be considerable, ensuring that the way in which EU regulators enforce the law is proportionate and concentrated on those businesses and activities where the risks of regulatory failure are more damaging to society and the economy. In addition, introducing and improving eGovernment systems will entail that data already collected by the government can be shared amongst authorities to prevent double reporting and errors. Electronic systems can reduce time spent and the annoyance factor for end-users, and also make it easier for businesses to find the information they need. The Commission, Council and Parliament should therefore ensure that new legislation does not create barriers to implementing eGovernment solutions. The Commission is cooperating closely with Member States in all kinds of areas when it comes to Member States' implementation of EU legislation. Working groups have been established in different areas to support Member States' implementation and exchange information, e.g. on challenges and best practice. In certain cases EU (implementing)

²³ E.g. similar to the website on Euromyths: http://ec.europa.eu/unitedkingdom/press/euromyths/index_en.htm

²⁴ Cf. HLG opinion of 28.01.2010, paras. 7, 9, 10, 12. http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/files/abr_hlg_opinion_28012010_en.pdf

rules provide for more standardised inspection methods,²⁵ in other cases the Commission provides guidance covering inter alia inspection issues. Concerning digitalisation and eGovernment, the Commission's Digital Agenda is one of the seven flagship initiatives of the EU 2020 Strategy. The eGovernment Action Plan 2011-2015 as part of the Digital Agenda aims to support the provision of a new generation of eGovernment services for businesses and citizens.²⁶ *The HLG supports the stakeholder's suggestions and welcomes the Commission's initiatives. In the HLG's view the Commission and the Member States should cooperate closely in the implementation of EU legislation, and in particular on the issue of inspection, and agree on legally binding minimum inspection criteria. The Group will closely examine the examples of best practices submitted for its planned report on best practices in Member States to implement EU legislation in the least burdensome way in this respect as well. Furthermore, the Group underlines the stakeholder's request that the EU institutions ensure that new legislation does not create barriers to implementing eGovernment solutions; as stated above, in the HLG's view 'smart' regulation should even go beyond and facilitate eGovernment solutions and promote e-enabling as far as possible,²⁷ while paying thorough attention to the security aspects of personal data protection in connection with sharing of data between public authorities.*

- (12) *Research – higher education institutions and 8th Framework Programme.* A stakeholder makes a series of suggestions for the 8th Framework Program (FP) and the European Research Area (ERA) (suggestion 8). First, the stakeholder argues for translating trust into regulations by including an ex ante proof of the institution's accounting methodology and processes and by aiming for low ex post controlling cost for institutes that have proven to be trustworthy. Second, he promotes a uniform framework of administration rules for all different subsidy programmes in Europe. At the same time, he suggests allowing national accounting practices into the EU subsidy framework, in order to avoid having two accounting systems for the same project. Furthermore, the stakeholder proposes allowing for a Single Information Single Audit (SISA) accounting system as in the Netherlands by allowing applicants to include subsidies into their annual accounts with the submission of the annual accounts being sufficient for intermediate accounting. In addition, a full cost based accounting system is requested as a more integrated system (combined with SISA). The stakeholder also argues for the use of lump sums. He suggests accepting smaller consortia which would decrease complexity and organisational costs. The Commission has already collected a multitude of stakeholder inputs for the preparation of the future Common Strategic Framework (CSF) for research and innovation which will be thoroughly analysed in the months leading up to the legislative proposals to be adopted by the end of the year. Concerning the stakeholder's suggestion on ex ante proof of accounting methodology, the Commission states that the 7th FP allows certifying beneficiaries' methods to calculate personnel costs and indirect costs. In addition, procedures for ex-post audits are also made easier, as for claimed personnel costs and indirect costs auditors will

²⁵ Cf. Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy (recital 9, Art. 74)

²⁶ Cf. digital agenda: http://ec.europa.eu/information_society/digital-agenda/index_en.htm; eGovernment AP: http://ec.europa.eu/information_society/activities/egovernment/action_plan_2011_2015/index_en.htm

²⁷ Cf. "Decalogue for Smart Regulation" and "An Administrative Burden Checklist", available at the HLG website.

focus on verifying that the calculation complies with the certified methodology. With respect to the requested uniform framework of administrative rules, the Commission tabled its proposal for the triennial revision of the Financial Regulation and its implementing rules in May 2010, and initiated discussions on funding rules at Commission level. Concerning EU research and innovation funding, a stakeholder consultation is open until 20 May 2011. The Commission takes due consideration of the suggested improved acceptance of national accounting practices, since the simplification from the point of view of the beneficiaries will be a key objective of the Commission proposals. A broader acceptance of the usual accounting practices of the beneficiaries may indeed support this approach. Concerning SISA, the Commission audit strategy for the future CSF will likely be part of the Commission's legislative proposals. Using lump sums for entire projects or lump sums and flat rates for certain cost categories are part of the options currently under discussion for the future CSF. Allowing for smaller consortia in appropriate cases is one of the options presented in the Commission's Communication on simplification.²⁸ This issue is to be tackled at the level of the work programmes, which are prepared on an annual basis in the 7th FP. *The HLG welcomes the commitment of the Commission to simplify the funding programmes from the point of view of the beneficiaries. The amount of stakeholder inputs already received by the Commission shows that stakeholders are eager to see improvements in this field and appreciate the Commission's simplification objectives. The Group repeats its call on stakeholders to get involved in the ongoing consultation.*²⁹ *The HLG supports the stakeholder's suggestions not yet tackled by the Commission, and would appreciate to be informed about the Commission's final conclusions on the stakeholder inputs for the future CSF.*

- (13) *Transport – aeronautics/aviation.* In suggestion 9 the stakeholder argues that in aviation, companies must nowadays produce different manuals: one for the design in order to obtain a type certificate, another one for the production in order to obtain a certificate of airworthiness, and a third one for maintenance (APRS). An initiative to pool redundant elements of these three different handbooks may create one manual, covering the design, production and maintenance. Secondly, performance standards are set according to safety criteria. Standardisation of these criteria would lead to a reduction in administrative burden. The stakeholder strongly endorses a high level of coordination between the civil aviation industry and legislators in setting standards. According to the Commission standardisation of manuals (exposition) is already possible today, as the National Aviation Authorities agree on the layout of these manuals (expositions). *The HLG supports the stakeholder's suggestions for an initiative to pool redundant elements of the different manuals and for an improved standardisation of safety criteria. The Group calls upon the Commission and national aviation authorities to cooperate in this respect as well as to look for best practices.*
- (14) *Evaluation/enforcement.* In order to alleviate problems with implementation and reduce inconsistencies, a stakeholder suggests a more direct exchange of information between the Commission and national enforcement authorities, for instance by field appointments, work experience of relevant new Commission staff in national

²⁸ COM(2010)187: "Simplifying the implementation of the research Framework Programmes"

²⁹ Cf. HLG opinion of 10 March 2011, paragraph 23, http://ec.europa.eu/enterprise/policies/better-regulation/administrative-burdens/high-level-group/files/hlg_100311_amsterdam_offline_opinion_en.pdf

enforcement authorities, regular online-surveys of enforcement authorities etc. (suggestion 10). According to the Commission 26 Member States already participate in an EU pilot project³⁰ for a more direct exchange of information between the Commission and national (enforcement) authorities via one central contact point established in 2008. With respect to field appointments etc. the Commission refers to the multifaceted differences between Member States and also regions as well as to the limited resources on EU level which would impede these activities. *The HLG welcomes the establishment of the EU pilot project for fostering an improved exchange of information on implementation and enforcement issues. While acknowledging the limited resources on EU and national levels, the Group supports the stakeholder's general idea of promoting an exchange of work experience in appropriate cases, and refers to existing initiatives such as the 'harvest experience' for an exchange with businesses.*³¹

III. Conclusions

- (15) *The HLG takes note of the suggestions made by stakeholders and encourages the Commission to take a proactive approach, as specified in the HLG's conclusions on the suggestions above. The HLG would appreciate to be informed about the steps taken by the Commission to address stakeholders' concerns.*
- (16) *The HLG stresses the importance of common efforts to reduce administrative burdens for businesses. These efforts must be extended and intensified both on the European and the national level, in order to reach the target of reducing red tape in a sustainable manner.*
- (17) *The HLG welcomes the active involvement of stakeholders with proposals for simplification and the reduction of administrative burdens. The HLG is of the opinion that many suggestions reviewed by the HLG prove that stakeholders have a vital role to play in the process of making European legislation simpler and less burdensome for businesses. The suggestions made by stakeholders should be taken as an incentive for new initiatives as well as an opportunity for the Commission to broaden existing initiatives to simplify and reduce red tape.*

Brussels, 5 May 2011

Annex: overview of suggestions

³⁰ Cf. http://ec.europa.eu/eu_law/infringements/application_monitoring_en.htm

³¹ Cf. p.12 (5.4) of COM(2009)128 on a simplified CAP for Europe