



# Report on Fast Track Actions to the High Level Group of Independent Stakeholders on Administrative Burdens

Brussels  
26 February 2008

# Reminder – What is the task of the High Level Group for the next three years?

The group's task is to ...

- ... advise the Commission with regard to the Action Programme for Reducing Administrative Burdens in the European Union. In particular, the HLG will
  - provide advice on administrative burden reduction measures suggested by the consultants, through internet consultation and local workshops in the Member States
  - advise the Commission at its request on methodological issues that may arise in the Action Programme
  - suggest which additional pieces of existing legislation could be included in the EU-wide measurement exercise, as necessary

(Mandate HLG, Art.2)

> Comprehensive advisory mandate for the Group



# Today's report to the Members of the High Level Group in three points

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- 1 Fast Track Procedures for Fast Track Actions – Gaining speed for implementing burden reductions
- 2 First assessment FTAs 2008 – Preliminary statement due to lack of quantification
- 3 Proposal for an Administrative Burden contest – Finding even more potential to reduce administrative burdens

> Request to the High Level Group for final approval



1

# Fast Track Actions to reduce administrative burdens require Fast Track Procedures

In order to achieve our 25% reduction goal by 2012 ...

- > First FTA package 2007 contains ten "depoliticized" proposals to reduce administrative burdens. Second FTA package 2008 contains 16 proposals
- > Although it was not possible to finalise all 2007 FTAs by the end of 2007, the Fast Track approach gave a clear impetus
- > To achieve 25% reduction by 2012, the EU will need to change a large number of legislative acts and consult stakeholders

... we have to overcome several difficulties

- > All in all, the entire process of adopting legislation takes up to 3 or 4 years
- > Already in 2003, the EP, the Council and the Commission pledged "to modify their working methods by introducing, for example, ad hoc structures with the task of simplifying legislation"
- > With EU-Elections scheduled for June 2009, legislation will probably slow down for half a year in 2009

> Need of Fast Track Procedures for reducing Burdens



# 1 A proposal for support by the HLG on how to reduce Admin Burdens by 2012

"In view of this situation the High Level Group calls upon all parties involved to use already existing procedures to speed up the implementation of the proposed measures and, where necessary and feasible, to foresee new such procedures.

In order to review the progress regarding the use or introduction of fast track procedures the High Level Group asks the Commission to present, starting from 1 July 2008 and every six months thereafter, a progress report on the use and implementation of all the above mentioned and linked measures as well on EU and national level."

> Transparency in implementing admin burden reduction

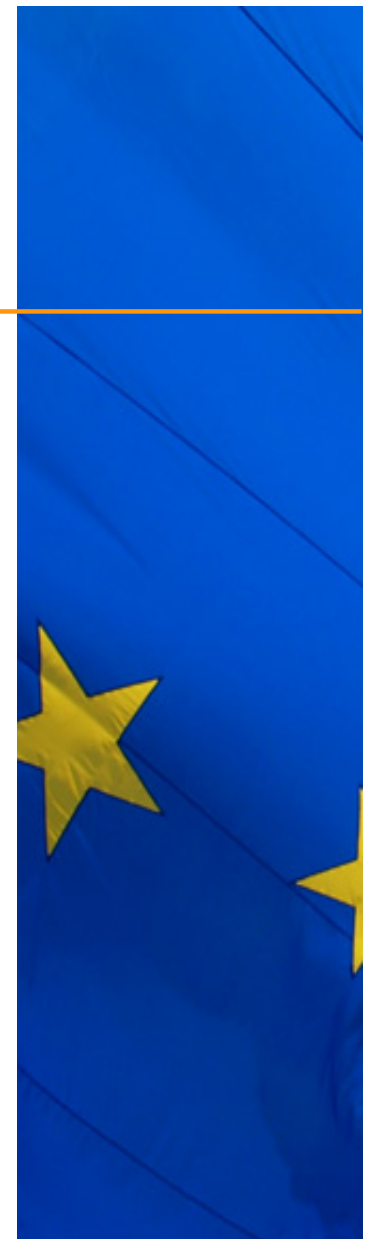
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## No final assessment without quantification – Today only limited assessment possible

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- > The High Level Group welcomes that the Commission has decided not to wait with reducing the burden on European businesses until the consortium of consultants has analysed the costs of bureaucracy
- > It must nevertheless be noted that neither the reporting members nor the Group can yet assess whether and to what extent the proposed FTA package might lead to such savings
- > This can only be done if and when the quantitative data which are still lacking are efficiently gathered by the EU Commission

- > It is proposed to receive a fully quantified SCM "quick check" on the proposed FTAs within 6 weeks



2

## However, some qualitative assessment was conducted – Summary of Proposals 1-2

### PROPOSAL 1

... concerns simplification of control procedures on modified starches by increasing the threshold from 16EUR/t to 50EUR/t below which these procedures do not apply

The Group welcomes the proposal and asks the Commission

- > whether an additional increase of the threshold value would be possible
- > if similar reporting commitments do exist for businesses in related industries
- > to clarify whether the regulation is in force in all MS

Reduction potential:  
Approx. EUR 150,000 – 780,000

### PROPOSAL 2

... concerns the removal of the obligation to report on reserves for flexibility for emission targets affecting off-road engines

The Group welcomes the proposal and asks the Commission

- > whether similar reporting obligations exist for stationary combustion engines (e.g. generators)
- > whether identical reporting obligations exist at nat. level for same information
- > for clarification as to whether these reporting obligations are systematically complied with in all Member States

Reduction potential:  
Not yet identified



2

## However, some qualitative assessment was conducted – Summary of Proposals 3-4

### PROPOSAL 3

... concerns the obligation on producers to give notice of the intention to operate radio-communication equipment

The Group welcomes the proposal and asks the Commission

- > how large the estimated potential reduction in administrative burdens would be as a result of an EU-wide harmonisation of the reporting obligations
- > to what extent the introduction of one-stop notification systems (the Member State informing the EU) while retaining national notification procedures would lead to a further reduction in bureaucracy

Reduction potential: Approx. 15,000 IO concerning 1000 firms

### PROPOSAL 4

... concerns the "variation directives" for the registration of pharmaceuticals

The Group welcomes the proposal and asks the Commission

- > whether said reporting obligations could not be reduced or standardised as a whole and/or more strongly concentrated
- > whether, in consultation with the European Medicines Agency, further simplification could be suggested
- > whether identical national reporting obligations exist

Reduction potential:  
Not yet identified



2

## However, some qualitative assessment was conducted – Summary of Proposals 5-6

### PROPOSAL 5

...relates to the harmonisation of definitions of volatile organic compounds

Assessment not possible at present

- > In principle, the harmonisation of conflicting definitions in EU law does not in itself constitute an action to reduce the burden of bureaucracy within the standard cost model
- > when harmonising or changing definitions information obligations and measurable administrative burden on businesses can indirectly be affected; these will then have to be quantified

Reduction potential:  
Not yet identified

### PROPOSAL 6

... concerns a clarification of an article in the Battery Directive

Assessment not possible at present

- > This action likewise does not relate to information obligations by businesses and does not constitute a direct reduction in the burden of bureaucracy within the standard cost model
- > The regulation nevertheless runs the risk of entailing a burden for citizens and businesses. However, only unclear information is provided

Reduction potential:  
Not yet identified



2

## However, some qualitative assessment was conducted – Summary of Proposals 7-8

### PROPOSAL 7

... concerns the relaxation of statistical reporting, particularly for small- and medium-sized enterprises (SMEs)

The Group welcomes the proposal and asks the Commission

- > whether the minimum reporting threshold for incoming goods can be lowered further than the proposed 95% of the trading value
- > whether it would consider reducing the threshold value for the company providing the goods, too
- > whether the reports could not be further simplified (e.g. by supply companies only)

Reduction potential: Approx. EUR 250 Million for 100,000 firms

### PROPOSAL 8

... concerns an extension of the interval of inspections of fishing vessels

Remark by the Group

- > One comment on this action notes that extending the interval between two inspections from four to five years would violate an International Convention ("Torremolino Protocol" of 1993)
- > If the action is found to conform with the Convention, the group further asks the Commission whether it would not be desirable to e.g. extend the interval between inspections to a period of more than five years

Reduction potential:  
Approx. 185,000 EUR in Denmark



2

## However, some qualitative assessment was conducted – Summary of Proposals 9-10

### PROPOSAL 9

... concerns the limitation of administrative burdens related to similar inspections on board the same ships, conducted, however, through different authorities

Proposal likely to be withdrawn  
(Information by the HLG-Secretariat on February, 8)

Reduction potential:  
Not yet identified

### PROPOSAL 10

... concerns the publication of information in national gazettes which has already been announced in (electronic) trade registers

The Group welcomes the proposal and asks the Commission

- > whether such duplicate publications, and hence the rule as a whole, cannot be eliminated altogether (current intention is merely to halt the publication of business data where this gives rise to cost)
- > whether the publication procedure in Estonia could not be applied more broadly as an example of reducing bureaucracy cost ("Online only")

Reduction potential:  
Approx. EUR 2.5 Million



2

## However, some qualitative assessment was conducted – Summary of Proposals 11-12

### PROPOSAL 11

... concerns the mutual recognition and translation of official documents in Member States

The Group welcomes the proposal and asks the Commission

- > whether all additional translations and reduplicated recognition of official documents between Member States can be avoided
- > whether in this case, however, a detailed analysis must first be obtained, particularly with respect to legal certainty in the mutual recognition of documents

Reduction potential:  
Approx. EUR 1.9-3.5 Million

### PROPOSAL 12

... concerns the abolishment of the demand for registration of intermediaries and the requirement that any staff directly involved in insurance mediation shall provide a clean police record

Proposal likely to be withdrawn  
(Information by the HLG-Secretariat on February, 8)

Reduction potential:  
Not yet identified



2

## However, some qualitative assessment was conducted – Summary of Proposals 13-16

### PROPOSAL 13

... concerns the reduplicated publication of written documentation at the level of Member States and, subsequently, at EU level

The Group welcomes the proposal and asks the Commission

- > whether a complete harmonisation of the Transparency and Prospectus Directive could not put an end to all forms of parallel reporting
- > whether an "Online only" solution could be possible (see Proposal No.10)

Reduction potential:  
Not yet identified

### PROPOSAL 14-16

... concerns granting small-size accounting regime to medium-size unlimited liability companies/ the elimination of certain disclosure requirements and a clarification issue

Remark by the Group

- > The Proposals 14-16 concern accounting standards and disclosure requirements for businesses and should be assessed as a whole when the measurement regarding Corporate Law is completed
- > The group asks the Commission whether analyses relating to the rules in question could be brought forward earlier
- > The Group will then assess the proposals

Reduction potential: Information on the benefit are currently being collected



# How can the Group best live its mandate? Proposal for a "Contest on Admin Burdens"

## Background and aim for the proposed contest

- > Full potential of FTA concept is not yet fully realised – Contest could support the Commission in accelerating the identification of FTA
- > Only few MS and Associations submitted proposals so far – Contest could enlarge attention for submitting Fast Track Proposals all over the EU
- > All MS are running initiatives for fighting Admin Burden – Contest could highlight best practices within the EU Member States
- > Everybody is confronted with Admin Burden – Contest could encourage stakeholder to use Online Consultation as a contact point for highlighting unnecessary Administrative Burdens

## Advantages for EU-COM and High Level Group

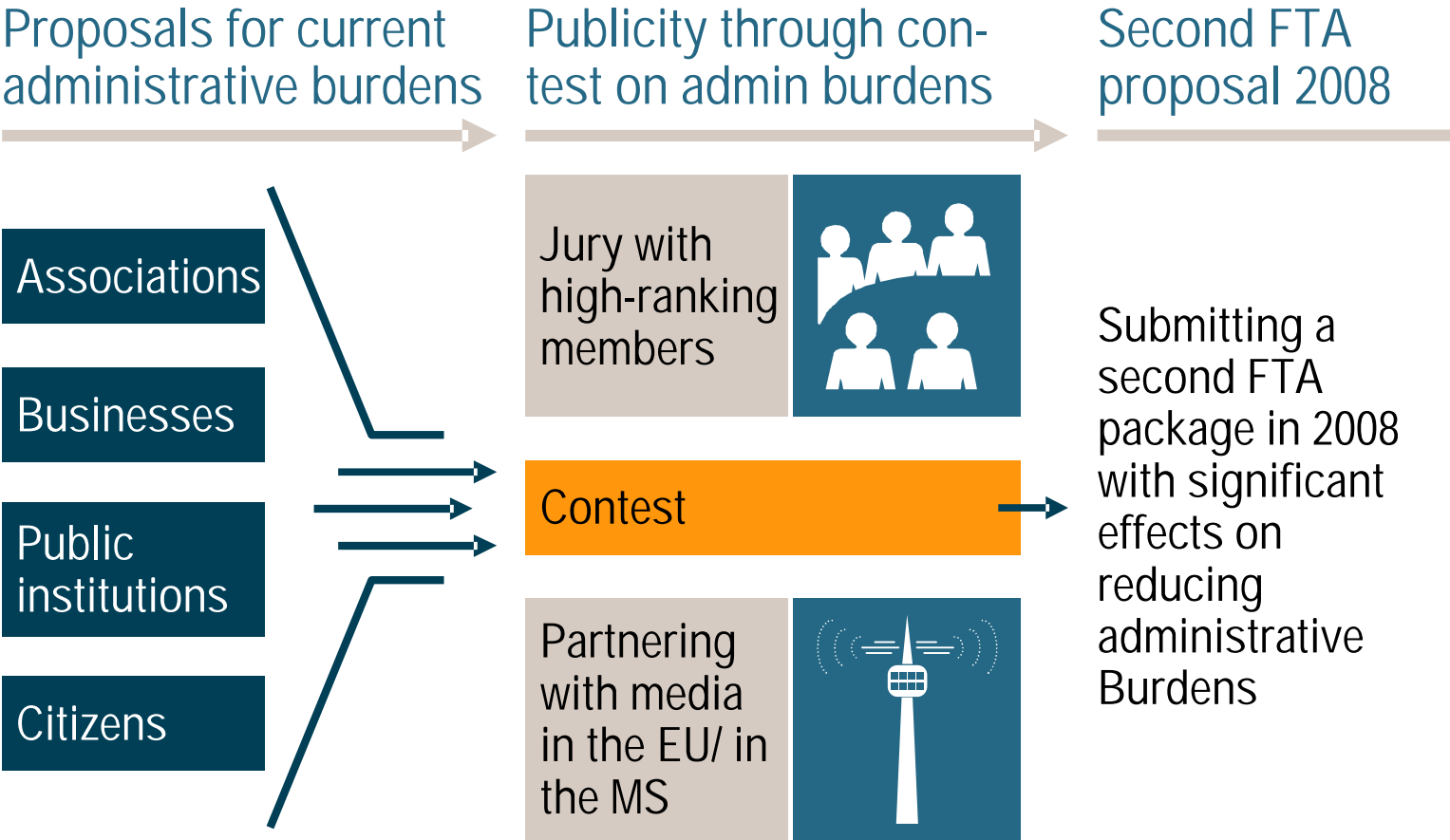
- > Opportunity to support all European actors in the common aim: "-25% in 2012"
- > Promoting the Action Programme for reducing administrative burdens into European society
- > Using the reputation of the Group members to act as multipliers in Associations, countries, etc.
- > Providing fruitful input for the discussions, e.g. for the workshops to be conducted

- > Involving more Stakeholder into Admin Burden reduction



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# Reducing administrative burdens – Tapping more potential through a European contest





THANK YOU FOR  
YOUR ATTENTION

MERCI POUR  
VOTRE ATTENTION

DANKE FÜR IHRE  
AUFMERKSAMKEIT