Directors of Better Regulation
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Process Re-engineering in Support of Burden Reduction.

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This document describes a methodology for making use of administrative burden measurement results in support of a simplification/ burden reduction policy. Though drawn primarily from experience gathered in France, it incorporates lessons learnt in other countries and shared via the SCM network, and hopes to provide colleagues in other countries with useful tools and tips, which will be adapted and adjusted as required by specific national circumstances or policies.

How does the burden reduction operation differ from traditional simplification efforts? Ministries are quite proficient, within their usual regulatory management capacity, to conceiving and developing reforms, some of which may be inspired by the wish to simplify existing legislation. Several countries, for instance Italy and France, have set up systematic reviews of normative corpuses, yielding hundreds of itemised reforms. But recent studies have shown the limits of such a manner of proceeding, the most spectacular criticism coming from the French Conseil d'Etat, underlining the "legal instability" and lack of practical impact that has been the result of such excessively frequent minor changes to the law.

The burden reduction approach takes a completely different starting point:
- it is centered on practical end-result measurable effects;
- the legal instrument is not as the prime agent for change. Implementation issues are viewed as the key to results. What is feasible is more relevant than what is desirable.

By its purpose and its techniques, the burden reduction methodology can be viewed as a type of process re-engineering, similar to BPR practised in private companies seeking greater cost-effectiveness and profitability.

Conditions for launching a burden reduction exercise
- a clear policy statement, shared across government, that administrative burdens need to be reduced, either by suppressing the unnecessary ones, or by applying an across-the-board target figure: this can be achieved by a variety of means: an announcement from the head of government, a policy document issued by a senior Cabinet member. But however clear the political impetus, it will need to be followed up by much discussion and persuasion at the level of regulating departments. It is therefore desirable to devote some time and resources to developing the necessary information documents, if possible with the help of communication experts, to promote the policy and its beneficial effects;
- a central resource, such as a Better Regulation unit, in charge of supporting the work in ministries and keeping the operation on target; unless it is decided at the policy level that the effort to reduce costs is going to be permanent, the unit would normally need to be strengthened by external assistance (from a consulting company). There is also the added advantage that delving into business practices and resources can best be entrusted to consultants, rather than handled directly by civil servants;
- the cooperation of the ministries/regulators, which requires a least one staff in each department to coordinate the response from the line regulating services, keep the project on course and timing and answer technical queries. In countries such as France where much of the implementation and enforcement of regulation is "deconcentrated", i.e. delegated to regional or local state authorities, it is very useful to enlist the cooperation of a sample of these "field" administrations (4 to 6 *départements* in the case of France). Speaking to officials actually enforcing regulation, who are often more receptive to the businesses' concerns, can prove a valuable contribution to re-engineering;

> **Burden reduction :**
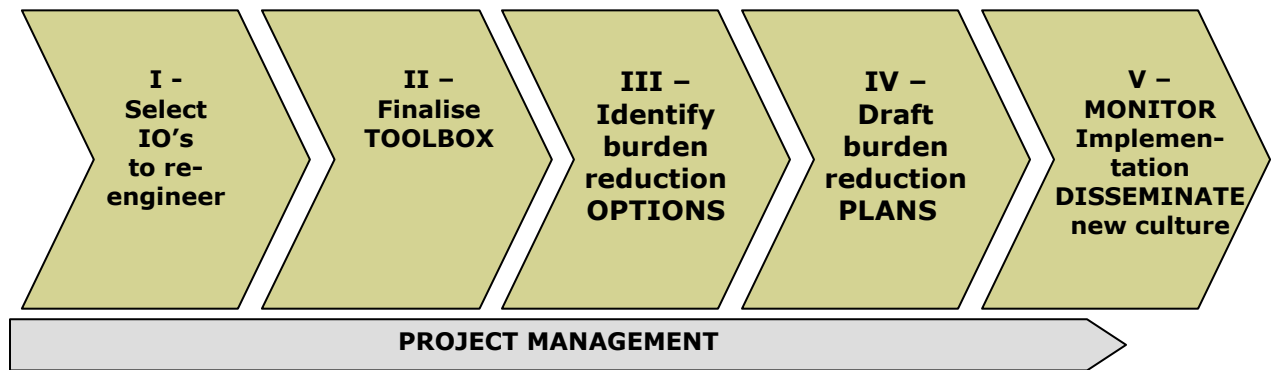> **who does what ?**
>
> The Burden Reduction Unit : this is the service in charge of centrally conducting the re-engineering operation seeking burden reductions. It is generally a section of the office in charge of promoting Better Regulation principles.
>
> The regulators: in this document, this term is used to designate the services in charge, in the ministries, of substantive policy and norms (primary and secondary legislation).
>
> The correspondents: they are the resource persons in the ministries/ regulating agencies, who coordinate operations involving various regulating directorates. They have a major role in organising the bilateral meetings between line regulating offices and the BRU.
>
> The consultant: the BR unit is usually be assisted by one or several consultancy companies, which will often support the labour intensive operations such as data collection with businesses and preparation of re-engineering action plans.

- sound measurement figures concerning relevant IO's: this document does not deal with measurement methodology [1] and its implementation. It should only be stressed that the chances and quality of the re-engineering will be greatly dependent on the robustness of the previous stage, with emphasis on the relevance of the regulations scrutinised, and the accuracy of the data collected, including the volumetry. To give an idea of the facts and opinions that need to be gathered, the template of the IO dossier is included in annex. There is still some discussion about what needs to be measured before sound process re-engineering can be conducted. In the most widespread version of the SCM, only the costs to the <u>businesses</u> are considered. In France, <u>total costs, including costs within the administration</u> (to manage and/enforce the regulations), have been found to be of great use when considering reduction options and implementation costs. This approach has also generated extra support for the scheme from within the participating ministries.

I - Select IO's to re- engineer	II – Finalise TOOLBOX	III – Identify burden reduction OPTIONS	IV – Draft burden reduction PLANS	V – MONITOR Implemen- tation DISSEMINATE new culture

PROJECT MANAGEMENT

The methodology has been broken down, for the purpose of presentation, into five phases, which follow a logical order. They may be adjusted or merged according to circumstances, degree of involvement and experience of participants, or different organisational setups, but none can be totally ignored for a good final result. Two of the phases may appear quite similar: the reduction <u>options</u>, and the reduction <u>actions</u>. This is because it is necessary to start in "brainstorming" mode, to be followed by a realistic investigation of the new simplification routes.

1. Selecting the information obligations

Whether the measurement exercise was conducted within a global baseline operation or whether it limited to a set of policy areas or specific events, it is often not possible or indeed necessary to re-engineer the totality of IO's measured which may be very numerous. It is much preferable to address the most promising IO's in terms of burden reduction potential, and apply the principle of proportionality of efforts. Indeed experts agree that the real weight of an obligation can only be guessed at the outset, and it is near impossible to ensure that all measured IO's will justify re-engineering.

Hence the need for a selection process to identify those IO's which will be subject to the difficult and labour-intensive re-engineering process. Two approaches are possible:
- a subjective choice: in the measurement stage, a lot of data has normally been collected as to the most unpopular or "irritating" IO's. These can be placed the list of candidate IO's;
- however, it may be preferable to set up a more objective procedure, by defining a number of criteria resulting from the purpose of the operation, and to screen the eligible IO's according to them. Among the most important criteria, the overall existing burden, resulting from either high individual cost or great volume of cases, would naturally come high on the list.

Experience has shown that in several countries, 20% of IO's account for about 90% of the administrative burden, so the list would start with those. Then it may be useful to add those IO's that have been earmarked during the measurement as particularly irritating to business. It may be useful at this stage to convene a meeting with representatives of the concerned businesses to check this data. In addition, it may be useful to add to the list a number of IO's related to the primary set, in order to increase the scope and significance of the re-engineering.

Once a draft has been drawn up, it is good policy to get the list "blessed" by the highest authority, in general the head of government, or prime minister. Experience shows that ministries will sometimes find it difficult to accept what they view as an intrusion into their inner workings, and even when there is a general consensus

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[1] There is now widespread agreement that the basis of future work should be the EU SCM methodology, available at http://ec.europa.eu/governance/impact/docs/sec_2005_0791_anx_10_en.pdf

about the burden reduction policy, may want to criticize opening investigations into specific regulations, viewed as sensitive "politically". Getting a powerful endorsement from the centre of government at this stage may help to limit or avoid later resistance. To be effective, this political endorsement should be sought from a meeting where the regulating offices would be present, and given an opportunity to voice their objections before the list can be agreed. This type of meeting can also be the opportunity to drum up some further support for the programme in general, by increasing the information to line ministries and outlining the type of help required from them during the process.

At this stage, it may be useful to also convene a meeting of the stakeholders, i.e. representatives of the economic sectors concerned by the re-engineering prospects. Because this group of partners would normally be expected to be favourable to the project, the meeting would be geared to enlist some practical support such as a priority ranking of objectives, and indications as to which reductions would be the most welcome, in order to focus later efforts.

In summary, the selection process must appear as transparent, "scientific" and accepted as possible. This requires convincing the regulators to accept the overall purpose of the policy and participate in the operation.

2/ Perfecting the re-engineering toolbox

When approaching line ministries with burden reduction projects, it makes sense to arrive prepared with a list of possible reduction techniques. This menu would be particularly helpful in ministries not totally attuned to the new concepts.

It draws upon the guiding principles laid out by the Commission for cost reduction exercises, which are to fleshed out in the specific context the BR unit is to work in.[2]

This stage which is methodological in nature must be implemented primarily on the occasion of the first re-engineering operation. Following rounds should be able to gradually build on results achieved during this stage on previous burden exercises, and proceed more directly to phase 3.

The purpose of phase 2 is to develop two types of toolboxes, addressing the valuation of respectively the burden reduction options, and the implementation costs.

2.1. burden reduction options: it is possible and indeed necessary to draw up a catalogue of all types of burden reduction measures, from which simplifications will be chosen during the re-engineering. This theoretical detour will be very useful by providing a checklist of possible reductions, and the onus of the demonstration will be placed on the regulator to fend of their application to the regulation under scrutiny, instead of asking the BR unit to prove the reduction is desirable.

There are many items in this catalogue, but they employ means that can be distributed between reductions bearing on the scope of the regulation, of a legal nature, and those bearing on the process, of a practical nature.

- changes to the legal framework, i.e. the wording of the regulations to restrict the number of businesses targeted or the substance of the information obligation;
- changes to the practical rules of implementation, notably by increasing the use of technology to assist both the business and the administration in dealing with the red tape; in this category, a lot can be done to improve knowledge among the businesses on the purpose and practical aspects of each obligation;
- reforms to the structure and organisation of the administrations, to access from users and facilitate the process of exchanging information in the course of administrative control; centralising different

> The Commission's principles for selecting burden reduction measures
> (from the Action Plan - 24.1.2007)
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> • Reduce the frequency of reporting requirements to the minimum levels necessary to meet the underlying objectives of the legislation (e.g. there are still many financial regulations that require
> monthly reporting; a reduction in the frequency could possibly be envisaged);
> • Review whether the same information obligation is not requested several times through different channels and eliminate overlaps (e.g. a number of environmental information obligations are presently
> required by more than one piece of legislation);
> • Require electronic and web-based reporting where paper based information gathering is presently required, using intelligent portals where possible (experiences in Member States demonstrate that intelligent portals covering a variety of information requirements can generate significant savings; in Norway the portal "Antinn" covers nearly all information obligations on businesses imposed by the central government);
> • Introduce thresholds for information requirements, excluding small and medium sized companies wherever possible, or rely on sampling (it is well known that SMEs suffer particularly strongly from administrative costs – data collection for information purposes should take this into account);
> • Consider substituting information requirements on all businesses in a sector by a risk based approach – targeting information requirements on those operators that carry the highest risk (the experience of UK enforcement of legislation in a number of areas shows that this can significantly reduce costs without compromising the legislation);
> • Reduce or eliminate information requirements where these relate to legislative requirements that have been dropped or modified since the information requirement was adopted (e.g. there are still information obligations in road transport dating back to the time when permits were required to carry out international transport).

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[2] COM(2006)691 « measuring administrative costs and reducing administrative burdens in the European Union ».

competences into one single operator is often one of the most effective ways of shortening the paper trail;

- the suppression of the obligation also needs to be mentioned and its impact measured in terms of benefits and risks for the businesses and the community at large.

The link with and suitability of each reduction option to the different types of information obligations, and an idea of the magnitude of reductions expected, must all be explored. For instance, the cooperation with inspections will be more sensitive to organisational reforms than to legal changes affecting the nature of the IO.

2.2. Implementation costs measurement tools

This is a study of the different types of action plans, that can be suited to each type of reduction option. It focuses on the change process and addresses questions of means and timing. It lists and evaluates different techniques for introducing change, and the assorted cost parameters. Of course, it cannot account for the great variety of conditions or circumstances that will be met by the project when the scrutiny of individual pieces of regulation starts, but it is important to give some prior thought to the issue, to all those involved to come with some preparation.

In optimal conditions, the output of this stage could be re-usable abaqui that could be applied to the regulations in phase 3.

3. Identifying the reduction options

This is the first of a series of three different meetings that are required to come to an accepted burden reduction plan.

During this first meeting, the line ministry will, assisted by the BR unit, conduct a scrutiny of possible burden reduction measures, and select the ones that appear acceptable, given a range of constraints such as the substantive policy requirements, enforcement standards. To facilitate this work, the BR unit will draw heavily on comments received during the measurement phase, including the suggestions from stakeholders. There are also often reforms under consideration in the ministry itself, or rejected in the past, that can be used as items to launch the discussion. The meeting can thus start on the basis of a set of reduction options for each IO under scrutiny, with estimates of reductions resulting from each option to convey orders of magnitude of the effect of each possible proposal, and its relation to the overall reduction target.

There are several ways of making the discussion more profitable, and more likely to yield reductions.

- Start the re-engineering as soon as possible after the measurement, to make sure that the same correspondents are still in charge, and can make use of the qualitative data collected in the previous phase;
- involve implementation services, who know how the regulation is applied and often perceive better how the reductions can be achieved; in France, though this was quite unusual, the "deconcentrated services" were invited to the option identification workshops, and proved they were less reform shy than the central administration;
- start with a collective reflection on what is the purpose of the IO under scrutiny, to develop awareness of the bigger picture, and stress the need to justify any burden placed on value-adding, employment generating businesses;
- if a great number of IO's must be surveyed, organise the simultaneous scrutiny of several related IO's in order to allow a coordination of simplification efforts: for example, when considering red tape on transport companies, it is useful to examine permits on opening the business, on licensing vehicles as well as certification of drivers;
- if possible, organise an input from the stakeholders: this is not possible in all countries, and where administrations are not used to facing the stakeholders over burdens, written submissions, or simple hearing can be organised;
- in more complex cases where several ministries are involved in managing the regulation, it can be desirable to organise the meetings on an economic sector basis, inviting all administrations carrying a stake in the regulation and its enforcement;

There is a common misunderstanding that burden reductions will cut to the flesh of the regulation and endanger the underlying substantive policy. This idea must be combated and participants made aware that there is an assumption that red tape can indeed be cut without incurring such risks, by better management of the legal schemes and implementation resources. More specifically, the benefits of modern ICT may not have been fully tapped and the reduction exercise will provide the occasion to hasten a process that would probably have occurred sooner or later.

The objective (reduction target) for the ministry, expressed as a target in euros, will need to be acknowledged/accepted at this early stage, to keep the line ministry focused on the need to suggest or accept measures contributing to the target. A system of quotas can be organised to keep the scrutiny on course (x% of the target to be achieved by a certain date).

Without this type of framework, it is near impossible to get regulating offices to suggest burden reductions, which will always appear as intrusive or dangerous to the implementation of the policy and/or the security of the processes.

Difficulties and solutions

The main difficulty of this exercise come from the sheer complexity of the administrative arrangements frequently in place to manage information obligations, which is precisely what has to be reviewed and simplified. It is necessary to invest quite some effort in understanding the process and value added at each stage by each intervening service. Unless this factor has been explored at the measurement stage, it may be hopelessly difficult to tackle at the re-engineering phase. This pleads for the parallel measurement of implementation cost of regulations within the administrations.

2/ non relevant IO's: once discussion really starts with the substantive regulators, it can sometimes appear that the initial selection of obligations did not accurately the problems faced by the businesses in the sectors. In that case, it is best to cut one's losses rather than generate largely formal burden reduction plans;

3/ lack of support from the regulators: it has already been indicated that the operation needs to be supported at the highest level, because of frequent reluctance at the administrative level, which needs to be addressed with the appropriate communication resources.

Should there be reduction targets ?

The countries which have registered the greatest success in burden reduction (NL, DK) have always credited the early setting of targets, around 25% in 3 to 5 years. Other countries including the UK preferred not to set targets before the measurement of the baseline was complete.

After much discussion at the European level, current consensus is on the following wording in the most recent Council conclusions (8/9 March 2007)

"The European Council therefore agrees that administrative burdens arising from EU legislation should be reduced by 25% by 2012. Taking into account the different starting points and traditions the European Council invites Member States to set their own national targets of comparable ambition within their spheres of competence by 2008" (http://www.consilium.europa.eu/ue Docs/cms_Data/docs/pressData/en/e c/93135.pdf)

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4. Drawing up action plans

This phase may require one or two meetings in technical workshop format, between the BR unit with each of the regulators/ ministries in charge of the regulations and procedures under scrutiny. It aims at drawing up burden reduction plans incorporating a number of simplification or organisation actions and their impacts, for each information obligation under scrutiny, with a calendar of implementation. While much of the work should or may have been done in the regulating offices themselves, on the basis of the drafts prepared by the BR unit, one or several meetings with the BR unit will in most cases be necessary to check progress, assist in resolving technical difficulties, especially with regard to the valuation of reductions and wrap-up the packages.

The deliverable, in the form of an action plan incorporating each regulator's commitment to the policy, under a Cabinet minister's signature, will include three essential components:
- the burden reduction measures, listed for each IO,
- the valuation of the intended reductions in administrative costs, both for the businesses and the services in charge, and the cost of implementing the changes;
- a calendar for implementation.

Experience shows that regulators do not easily adopt measures with the prime objective of reducing the burden, as they are more sensitive to and held accountable for the policy results and legal security. It takes quite some convincing to enlist their support, which will be more forthcoming if the political commitment is expressed in clear terms.

In some cases, reform plans under discussion or in prospect in the ministries can provide a starting point in the discussion, and the BR unit will have explored ministries' websites in search of such suggestions and reform prospects (white papers, inspection reports, pressure from stakeholders, etc).

There are several ways of making the workshops more productive, in terms of final burden reductions.
- as this phase is a direct continuation of the option identification task, the same recommendations as expressed in the third phase apply here: make use of the grass-roots services, increase awareness of the bigger picture to keep participants motivated,
- at the outset, concentrate on the substance of the IO management and simplification without being deterred by implementation issues which will be handled at a later stage, once the measures have been identified for their reduction capacity;

- at this stage, associate the stakeholders in a formal manner, sharing as much data with them as possible about the technical points under consideration. This may not be in the custom of many countries, but it is in line with the more recent Better Regulation principles, and takes some adjustment from both parties, until some mutual trust has developed;
- focus on the bottom line, in this case the need to achieve the overall target reduction as it has been defined for the ministry.
- Personalise the reform effort, by highlighting the inventiveness of individual officials who have given thought to the issues and come up with new proposals. If possible, organise some sort of emulation between projects within the same ministry or between ministries;
- Bring the political pressure to bear on the reluctant regulators: the exercise cannot be limited to a technical job that can be done by the consultant. It can require escalation to higher levels when there is little or no cooperation from the regulator. BR unit permanent staff from the senior grades must be present at all the workshops to impress upon the correspondents the urgency of the cost-cutting exercise.
- While the workshops would normally be organised, with the help of the correspondent, it may be necessary to hold individual meetings with regulating offices, for more specific technical work.

Difficulties and solutions
- the multiplicity of agencies and services, or different levels of government, often account for the excessive burden and the failure of past attempts to simplify the regulation and related procedures. Once this factor has been identified, it is necessary to adjust the workshop membership to ensure that all administrative stakeholders have been involved. Though the workshops are usually convened on a ministry basis, it may be necessary to open them up to related agencies or other quasi autonomous bodies;
- inspection issues: among the multiple actors in devising and implementing regulation, special consideration should be given to enforcement and inspection modalities when examining obligations. There is in general insufficient connection between these two dimensions of policy management.
- Administrations will naturally be bent on using the process to lower their own costs first. The BR unit will need to be vigilant to avoid this pitfall. In France for instance, a specific policy on efficiency of public service delivery is conducted by another branch of State Reform under the name of "modernisation audits", and the two policies must not be amalgamated.

> **Two examples** of successful action plans (France)
> 1/ the reform of the exceptional transport authorisation: savings amount to € 9.4m out of a burden of 33.3 m (28%). This is achieved mainly by setting up an on-line procedure, where both the companies and the services can access the files. Where the company had to file one request for each département involved, there is to be only one request which is automatically routed to each service that needs to approve the transport;
> 2/ certification of new non-standard vehicles (burden reduction: 4.8m out of 20.5 i.e. 23%). The scrutiny yielded the idea that the approval could be transferred to the automobile bodywork yards, which had the advantage of suppressing one of the stages of the procedure without loss of control, and generating a reduction of delays. The certification is also to become valid for the full European market, and not only in France.

5. Ensuring effective implementation

Once the action plans have been formalised, there is still a lot to do before they can become effective. Also, burden reduction must be a constant effort, as new charges are always appearing, or the economic environment requires further adjustments. For these reasons, there are three main activities in the aftermath of the action plans.

5.1. Transforming the plan into practical measures
At the end of the process re-engineering conducted in each ministry, the BR unit has elicited a number of ministerial action plans. However, in many cases, this is not quite enough to ensure that the intentions will be carried into real-life improvements for companies.
As has been indicated earlier, more than one authority may be involved in policy implementation. Enforcement and inspections can be handled by other ministries, or a network of deconcentrated services as in France. Some thought must therefore be given to the best way to remove any obstacle and increase the impetus for change. One way is to get the simplification programme "blessed" by the centre of government, in the way most appropriate to the current legal system. These issues must be covered in the action plans, and a clear distinction made between the measures requiring legal changes (in primary or secondary legislation) and those that only require resources.
Secondly, some time will have elapsed between the drafting of the action plans and the official endorsement by the centre of government, so it makes sense to give some emphasis to the end of the preparation and the beginning of the implementation. It may be worthwhile to organise a series of events, depending on the national

context and customs, to mark this important step. An interministerial meeting of the correspondents may be the occasion to promote the most active participants in the programme. A series of bilateral meetings with each ministry may celebrate the results and open the way for the launch of another measurement campaign. In all cases, it is good policy to use the momentum gathered with the publication of the actions plans to generate some good will for the two further tasks, monitoring implementation and ushering in a new culture.

5.2. Monitoring implementation
Managing change is in itself a major governance subject, and our burden reduction efforts are not easier to carry out than any other reform. The difficulties of introducing simplification are numerous and though well known, the pitfalls are not easily circumvented.
For that reason, burden reduction projects must include a long phase of monitoring, which needs to be supported by the BR unit. At least two progress reviews should be organised over a period of one year, and report on the two main obstacles that generally appear: legal constraints delaying the introduction of amendments to existing rules, and insufficiency of resources to implement the other types of measures.

5.3. Disseminating the burden reduction culture
Without speaking of a mystique, there is no doubt that the commitment to BR requires some change of mentality or at least of culture. In several countries, the administrations have preserved their influence by managing a complex set of rules, irrespective of the negative impact on other components of society. This needs to change. A good expression of a new approach is given by the recent Polish example of introducing the "think small first" principle[3] but there are plenty of other things to do, depending on the national context.

6. Project management issues

Like all reforms within public administrations, simplification and burden reduction must be carefully managed, to avoid getting bogged down by delays, or running on parallel courses and not produce consistent results.
In this case, the major challenge is to get people in different ministries, who are each engaged with their own priorities, to work together towards a common objective. Various tips have been given in the above sections, but here are some more general points to bear in mind throughout the operation:
- Increase engagement of partners by effective promotion of the policy, with targeted documentation, including the European dimension, and giving an over-arching picture of the operation;
- provide continuous practical support, in the form of drafting the reports on individual IO's, the lists of options and their costs, and the action plans; this may require significant resources;
- offer a rigorous framework to collect data and information, which is to be centralised in a database, for future analysis;
- be ready to accommodate regulators' reform plans into the BR programme, as long as they include a potential for burden reduction. The cooperation of the ministries will be more forthcoming, and once appropriated, the methodology can be applied to government or European level priorities;
- in practice, project managing this type of operation means holding regular meetings to check progress, and keep the momentum. There are two types of meetings: the interministerial, where all correspondents (see box page 1) are invited to agree the basic

Conclusion
Achieving results in the Administrative costs measurement and reduction can be viewed as the ultimate test of the Administration's capacity to examine itself from the "clients" point of view and reform itself by internal change. Perhaps the factor most influential on the overall effectiveness of the project is the selection of obligations, which should try and target the burdens most damaging economically, to contribute to the increase of productivity and jobs. It is not easy, within the thousands of norms, instructions, standards, to pinpoint those that have the most negative economic effect, so the project should first address the recurring obligations. Also, if the stakeholders have been carefully consulted, and have been able to contribute (they are not always in a position to provide the feedback), the administration should at least be credited with the concern of addressing theirs most irritating obligations. And the best results will not necessarily be the savings recorded at the end of the re-engineering process, but the small "cultural" change achieved when colleagues in the regulating offices, working with those in the field, will have learnt to more carefully consider the effects of the norms and procedures they are devising for businesses, and that change of outlook gradually permeates into all levels of the bureaucracy.

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[3] http://www.reforma-regulacji.gov.pl/English/

N°XX	Name of the obligation		
Objectives	Force /Notify/ XXXXXXXXXX (objective of the regulator)		
Description	**This obligation makes it mandatory for the business to** : **This obligation makes it mandatory for the administration to :**		
Type of obligation			
Obligation requiring delays			
Economic sectors concerned			

Related bligations		N°	Name		Sector

Regulation	**Origin**	International	European	National
	Texts			

Reform under way		

Actors (administration)	**Lead ministries**	

	Enforcing Services	**Central Administration**	
		Ministry	*Directorate*
		Deconcentrated	
		-	

Perception by the businesses	Annual frequency of obligation	Load of work generated	Perceived usefulness

Quantitative data	**Elements**		
	Volumetry of requests (/year)		
	Frequency of requests (/year)		
	Segmentation of the obligation (types of businesses)	**Number of dossiers**	**Unit cost**
	Toute entreprise		

Costs	**Type of costs**	
	Costs to business (SCM)	
	Impact of delays	
	Costs to the administrations	

ANNEX II : Example of re-engineering measures suggested during the measurement phase

<u>**Comments :**</u>
This section of the file gathers and summarises the suggestions made by companies and officials met during the data collection phase.
When available, solutions must be presented with the problem identified. There can be multiple issues in each category (1st column).

Comments received from the implementing administrations :

Improvement of service	La difficulté majeure identifiée sur cette procédure est qu'elle est gérée conjointement par deux ministères, à savoir le MINEFI et l'Agriculture. Cette double responsabilité ralentit énormément la transmission des informations relatives aux règles d'attribution aux exploitants. En effet, cette obligation doit porter la double signature du TPG et du préfet pour entrer en vigueur. Le TPG aurait pourtant la légitimité pour signer seul.
	o Piste d'amélioration : Identification d'une responsabilité unique dans la mise en œuvre et le suivi de cette procédure.
Improvement of procedure	La validation qu'elle apporte pourrait directement être effectuée au niveau de la Trésorerie Générale. La DDAF se retrouve ainsi à valider des dossiers sur lesquels elle n'a pas de visibilité. D'années en années, le nombre de cas posant problème à la TG diminue, la TG gagnant en autonomie. Enfin, les informations recherchées par la DDAF pour le compte de la TG pourraient être obtenues directement par la TG via des organismes comme la MSA.
	o Piste d'amélioration : Traiter intégralement la procédure au sein d'un service : § soit l'ordonnateur, la DDAF, qui dispose des informations concernant les exploitants et du droit de mettre en paiement instruit la procédure, § soit la TG se voit conférer le droit de mettre en paiement elle-même, dans le respect de critères définis par l'ordonnateur, sur le modèle d'un service facturier.
Improvement of process	Cette procédure s'étalant sur des phases de 6 mois, cela implique pour la TG et la DDAF une charge de travail double.
	o Piste d'amélioration : Lissage de la procédure sur une année, d'autant plus que le coefficient appliqué au litre est le même sur une année (cela engendrerait un gain de temps pour les agriculteurs, pour leurs comptables ainsi que pour la MSA qui fournit les attestations d'affiliation requises par la TG). Centralisation en outre de cette procédure sur une période de trois mois (15 janvier – 15 mars).
IT improvements	Il a été signalé au niveau local certaines mésententes entre les services de la DDAF et de la TG, notamment dans la gestion des formulaires papiers. Du fait que deux services sont impliqués, la gestion et la mise à disposition des formulaires varient d'un département à l'autre. Certains formulaires seront en mairie, d'autres directement dans les Trésoreries, impliquant pour le service qui les met à disposition une charge supplémentaire, ne serait ce qu'en terme de volume papier à envoyer.
	o Piste d'amélioration : Permettre une déclaration en ligne, et rendre le formulaire disponible en ligne, ceci afin de limiter la charge papier. En parallèle, une rationalisation des lieux ou ce formulaire serait mis à disposition.
Monitoring of policy improvements	Il n'existe pas de possibilité réelle de contrôler l'usage qui a été fait du fioul. L'exemple classique est une demande de remboursement de fioul qui a en fait servi à un usage domestique. Le Val d'Oise a, en interne, développé son propre système de barème de consommation moyen pour une exploitation.
	o Piste d'amélioration : Harmonisation des méthodes d'évaluation et de suivi au sein d'un système informatique permettant de tracer l'historique des consommations pour un exploitant et de comparer cette déclaration avec des exploitations équivalentes.
Simplification of forms	Cette procédure permet de déposer deux demandes dans l'année. Or à chaque demande, il est redemandé systématiquement l'ensemble des pièces justificatives (notamment justificatif RCS et affiliation MSA).
	o Piste d'amélioration : Sur une année, une fois la première demande enregistrée, une simple déclaration sur l'honneur de non changement de situation lors de la deuxième demande.

From the business perspective :

Improvement of process	Les entreprises sont globalement satisfaites de cette formalité, perçue comme simple et légère. Certaines suggèrent toutefois des mesures de simplification.
	o Piste d'amélioration : Application d'une ristourne à la source sur les achats de gaz et de produits pétroliers.
	o Piste d'amélioration : Suppression de la nécessité d'envoyer son RIB à chaque demande. L'exploitant ne devrait avoir à fournir cette information que lors de sa première demande ou suite à un changement d'identité bancaire.

From the central administration :

Improvement of service	En application du principe de séparation de l'ordonnateur et du comptable (RGCP), et même s'il s'agit de dépenses sans ordonnancement, le TPG ne peut se prononcer formellement sur le droit à restitution. L'intervention de la DDAF est obligatoire. Si un seul service devait intervenir dans la phase d'instruction, ce ne peut être que la DDAF. Le TPG sera dans tous les cas chargé du paiement.
Improvement of process	Cette proposition revient à différer le remboursement des factures du premier semestre de 6 mois, ce qui n'est pas neutre pour la trésorerie des entreprises. Elle a été écartée pour des raisons politiques. Les agriculteurs qui ne souhaitent pas déposer deux demandes peuvent déposer un seul dossier pour l'ensemble de l'année.
Improvement of IT	Les formulaires sont déjà disponibles en ligne (à confirmer par le ministère de l'agriculture). Par ailleurs, il n'existe qu'un seul circuit de diffusion des formulaires, gérés par le réseau du ministère de l'agriculture. Les imprimés ne sont plus délivrés dans le réseau du Trésor public depuis 2005.
Monitory of policy improvements	L'affiliation à la MSA étant une pièce justificative du droit à remboursement, un accès de la Cour des comptes au système d'information de la MSA doit être organisé en parallèle. Cette information doit être consultable dans un délai compatible avec le jugement des comptes. Cette proposition ne peut être mise en oeuvre sans consultation préalable de la Cour.
IT improvements	Cette proposition qui devrait être mise en oeuvre par le service instructeur suppose le développement d'une application dédiée. Sa mise en oeuvre engendrera une double saisie des informations relatives au remboursement (sauf à l'interfacer avec NDL). Au niveau local, il existe déjà des barèmes de référence transmis par les DDAF aux TG pour déterminer les consommations élevées qui peuvent nécessiter une expertise de la DDAF.

Annexe III: The re-engineering process

Stage I : *list of reduction measures and statistical information*

Existing obligations					Target obligations							Informations to be collectedr
Title of the obligation	N°	Type d'obligation	Number of files	Frequency	Title of the obligation	N°	Type of obligation	Threshol d	Types of businesses concerned	Number of files	Frequency	
1	2	3	4	5	6	7	8	9	10	11	12	13
Certification of new non-standard vehicles	30	Application for specfic permission or derogation	55553		Certification of new non-standard vehicles	30.1	Application for specfic permission or derogation			29953		
RPT	30a	Application for specfic permission or derogation	2053	Certification by type of vehicle	RPT (simplified)	1	Application for specfic permission or derogation			2053	Certification by type	
RTI	30b	Application for specfic permission or derogation	21500	Certification of each vehicle	RTI (simplified)	2	Application for permission or derogation			21500	Certification of each vehicle	
CCI	30c	Application for specfic permission or derogation	32000	Pour chaque carrossage	CCI	3	Application for permission or derogation			6400	Pour chaque carrossage	
					CCI carrossier	4	Application for permission or derogation			25600		
					Certification delivered by the automobile bodywork yards	30.2	Application for general permission or derogation		Bodywork yards	NC		The cost of application

Stage II (not depicted): calculate for each measure the effect on the cost of each application, both for administrations and for businesses

Stage III: *Summary of existing and target costs, for each information obligation, with segmentation*

Existing obligations						Target obligations					
Titre de l'obligation	N°	Type of obligation	Annual cost for business	Annual cost for admin.	Total annual cost	Title of obligation	N°	Type of obligation	Annual cost for business	Annual cost for admin.	Total annual cost
1	2	3		5	7	8	9	10	11	12	14
Certification of new non-standard vehicles	30	Demande d'autorisation ou de dérogation générale	14 277 121	6 166 383	20 443 504	Certification of new non-standard vehicles	30.1	Application for specfic permission or derogation	7 697 921	3 324 783	11 022 704
RPT	30a	Demande d'autorisation ou de dérogation générale	2073530	1461736	3535266	RPT (simplified)	1	Application for specfic permission or derogation	1 969 854	1 388 649	3 358 503
RTI	30b	Demande d'autorisation ou de dérogation générale	4909167	1913500	6822667	RTI (simplified)	2	Application for permission or derogation	4 663 708	1 817 825	6 481 533
CCI	30c	Demande d'autorisation ou de dérogation générale	7306667	2816000	10122667	CCI	3	Application for permission or derogation	1 461 333	563 200	2 024 533
						CCI carrossier	4	Application for permission or derogation	3 840 000	0	3 840 000
						Certification delivered by the automobile bodywork yards	30.2	Application for general permission or derogation	Non mesuré	Non mesuré	Non mesuré
Total			14 289 363	6 191 236	20 480 599				11 934 895	3 769 674	15 704 569

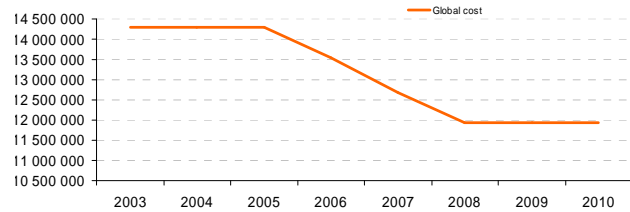|		
Target reduction business	2 354 468	16%
Target reduction admin.	2 421 562	39%
Total reduction(%)	4 776 030	
Total reduction (€)	23%	

Stage IV : *inclusion of implementation costs and schedule of burden reduction, both for administrations and for businesses*

N° obligation	Existant / cible	2003 frequency / Annual cost for business	2004 frequency / Annual cost for business	2005 frequency / Annual cost for business	2006 frequency / Annual cost for business	2007 frequency / Annual cost for business	2008 frequency / Annual cost for business	2009 frequency / Annual cost for business	2010 Volumétrie / Annual cost for business	Comment
obligation n°30 : réception de véhicules neufs, amé nagés ou transformés, en vue de leur homologation									
30a	Existing	2 053	2 053	2 053	2 053					
		2 073 530	2 073 530	2 073 530	2 073 530					
30b	Exising	21 500	21 500	21 500	21 500					
		4 909 167	4 909 167	4 909 167	4 909 167					
30c	Existing	32 000	32 000	32 000	22 400	16 000	6 400	6 400	6 400	
		7 306 667	7 306 667	7 306 667	5 114 667	3 653 333	1 461 333	1 461 333	1 461 333	
1	Target					2 053	2 053	2 053	2 053	
						1 969 854	1 969 854	1 969 854	1 969 854	
2	Target					21 500	21 500	21 500	21 500	
						4 663 708	4 663 708	4 663 708	4 663 708	
3	Target				9 600	16 000	25 600	25 600	25 600	
					1 440 000	2 400 000	3 840 000	3 840 000	3 840 000	
Implementation cost (€)										
Global cost		14 289 363	14 289 363	14 289 363	13 537 363	12 686 895	11 934 895	11 934 895	11 934 895	

Certification of new non standard vehicles
Evolution of annual costs for administrations
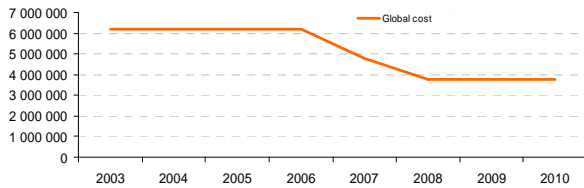
Certification of new non standard vehicles
Evolution of annual costs for businesses

N° obligation	Existant / cible	2003 frequency / Annual cost for admin.	2004 frequency / Annual cost for admin.	2005 frequency / Annual cost for admin.	2006 frequency / Annual cost for admin.	2007 frequency / Annual cost for admin.	2008 frequency / Annual cost for admin.	2009 frequency / Annual cost for admin.	2010 Volumétrie / Annual cost for admin.
obligation n°30 : réception de véhicules neufs, amé nagés ou transformés, en vue de leur homologation								
30a	Existing	2 053	2 053	2 053	2 053				
		1 461 736	1 461 736	1 461 736	1 461 736				
30b	Exising	21 500	21 500	21 500	21 500				
		1 913 500	1 913 500	1 913 500	1 913 500				
30c	Existing	32 000	32 000	32 000	22 400	16 000	6 400	6 400	6 400
		2 816 000	2 816 000	2 816 000	2 816 000	1 408 000	563 200	563 200	563 200
1	Target					2 053	2 053	2 053	2 053
						1 461 736	1 388 649	1 388 649	1 388 649
2	Target					21 500	21 500	21 500	21 500
						1 913 500	1 817 825	1 817 825	1 817 825
3	Target								
Implementation cost (€)					9 120	22 320			
Global cost		6 191 236	6 191 236	6 191 236	6 200 356	4 805 556	3 769 674	3 769 674	3 769 674