

**Comments on OECD Working Paper:  
'Measuring Regulatory Reform'**

Claudio M. Radaelli, Oliver Fritsch

Discussant: Brian Huijts

# General remarks

- Shortcomings in the past of so many efforts undertaken by countries when trying to measure regulatory performance.
- Current debate in regulatory reform.
  - \*‘the discussion of individual tools and their usage [ ...] may miss the whole point of Integrated regulatory management’ [2.24]
- Trajectories suggested by the OECD, the World Bank and the European Commission
  - \*It was suggested ‘to move from a narrow focus on administrative burdens to a comprehensive consideration of regulatory costs, and from costs considerations to benefit-cost principles’ ([2.23])

# Q1: What are the pros and cons of the proposed recommendations?

## Cons

- Abstract and (very) concrete indicators are suggested:
  - \*question: is that applicable?
- No differentiation between Macro-Micro studies is suggested
  - \*question: what do cross-country experiences tell us?
- Were political and human factors included when considering the suggested indicators?

## Pros

- Finding that few examples that countries have moved from activities and information to data and proper indicators
- recommendation for the inclusion of regulators
- recommendation about composite indicators
- statement about re-calibration from burdens to the wider concept of regulatory costs.
- Recommendation to not super impose new organisational structures to the existing ones.

Q2: How can the proposed evaluation system and identified set of indicators be put in place? What modifications would be helpful in order to apply them?

-Difficult to answer this question at this point.

-Still much unclear about ins- and out's of proposed system and indicators.

To get more insight:

- Best-practises amongst countries might be considered
- Comparative study about 'strengths and weaknesses' of individual indicators might be carried out
- Further classification of indicators might be useful
- Suggested

## Q3: specific challenges related to communication currently not addressed in the paper?

(from Dutch experiences)

- Application of communication in regulatory process should be further elaborated upon.
- Communication can both be a mean and a goal
- Stratification of business community in distinct group is useful
- Macro and Micro level should be assessed separately
- ‘profiling’ businesses is very difficult
- Causality is difficult to prove
- Regulation is ‘negative concept’: possible bias in outcomes

Brian Huijts

Regulatory Reform Group

The Netherlands

[b.b.w.huijts@rr.nl](mailto:b.b.w.huijts@rr.nl)