



EUROPEAN
ENVIRONMENTAL
BUREAU



TO: Vice President Frans Timmermans, European Commission

Brussels, 5 February 2015

Dear Vice President Timmermans,

Open letter: Dissenting Opinion of HLG on Administrative Burden

We have noted with interest your announcement on December 18 to appoint [REDACTED] as [REDACTED] on 'Better Regulation'. The public interests that our four organizations represent (health, environment, labour and consumers) were members of the High Level Group on Administrative Burdens (HLG) that was chaired by [REDACTED].

Our representatives on this group disagreed strongly with a number of the Group's final recommendations and we are deeply concerned that [REDACTED] appointment means that these final, highly controversial, recommendations will be given undue importance in your deliberations on how to take the 'Better Regulation' agenda forward. We ask you to reassure us that you will also seek the advice of civil society representatives on an ongoing basis. The dissenting opinion of the four civil society members of the HLG is annexed to this letter.

If the Commission were to adopt a net target to reduce regulatory costs or to offset new 'burdens' by removing existing ones (also called one-in-one-out) or to create new, permanent technocratic bodies with potentially far-reaching powers, it would mean that 'Better Regulation' would simply mean 'less regulation in the public interest' – something that, in your hearing in front of the European Parliament, you said yourself would mean a failure of the better regulation agenda.

The cost of non-regulation to our society would be staggering, not only through an increase in health costs, environmental degradation, loss of consumer confidence and protection of workers' rights but also politically, it would signal to European voters and citizens that primary goal of the EU 'Better Regulation' agenda is to benefit Europe's businesses thereby further eroding citizens' trust in the EU.

We therefore ask you for a meeting to allow for an in-depth discussion of the concerns raised in the dissenting opinion to the HLG report and to explore ways in which the Commission's 'Better Regulation' can be reformed to better serve the public interest.

Yours sincerely,

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