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COMPARING THE CONTENT OF REGULATORY IMPACT ASSESSMENTS IN THE UK AND THE EU

Abstract

This article examines the content of impact assessments in the European Commission and the UK for the period 2005 to 2010. We coded 477 impact assessments for the UK and 296 for the European Commission, using a detailed scorecard - adjusted to reduce the bias evidenced by previous usages of this instrument. The findings suggest that impact assessment is not a perfunctory activity in the European Union and the UK. The breadth of consultation and economic analysis has improved steadily across the years, arguably as a result of learning and regulatory oversight. The UK and the European Commission are strikingly similar on a number of dimensions (such as economic analysis and identification of costs and benefits). However, the impact assessments of the European Commission seem to pay more attention to social and environmental dimensions. The conclusions reflect on the implications of our findings for current policy discussions concerning regulatory quality and the role of regulatory oversight bodies.

Keywords: Regulation, impact assessment, regulatory oversight, European Union, UK

1. Introduction

Regulatory impact assessment (or simply impact assessment, IA, because of its usage for regulatory and non-regulatory proposals) is now a common tool for policy appraisal in the EU and the UK. Its thrust is to carry out a type of pre-legislative scrutiny of new policy proposals. This scrutiny revolves around a definition of the problem to be regulated, an appraisal of the status quo and its likely evolution, consultation, an economic analysis of the likely effects of a range of feasible alternatives that address the identified problem, and an indication of the preferred policy option. It is used in the UK to appraise primary and delegated legislation. For the European Commission IA is the major policy instrument for the analysis of proposals for directives, regulations and recommendations. There are also IAs of EU legislation that has reached the implementation stage.

Previous research suggests that the UK and the EU have established the most developed IA systems across Europe (Renda, 2011; Hertin et al., 2009). IA are regularly produced and special oversight bodies have been created to support government departments and European Commission Directorates-General, respectively, to check on the implementation of quality standards in the process of assessment (Wiener and Alemanno, 2010). In Brussels, the Impact Assessment Board (IAB) publishes opinions on the IAs produced by the different DGs. The IAB brings together five permanent

and four rotating Director-level officers from different DGs in their personal capacity and answers to the President of the European Commission. Its work is prepared by the Secretariat General of the Commission. In London, the Regulatory Policy Committee (RPC), established in 2009, has published opinions and data on the quality of IA. However, more recently, it has gained competences in exercising oversight on departments at a much earlier stage. Rather than publishing opinions on completed IAs, the RPC interacts with departments during the production phase and suggests modifications or types of analysis. The RPC is an independent body with its own secretariat. Its experience was recently reviewed by Gibbons and Parker in this journal (Gibbons and Parker, 2012).

This article analyses a sample of IAs produced between 2005 and 2010 in the UK and at EU level. We explore whether the quality of IA has improved over the years and what the main differences are between the two systems. Section 2 briefly reviews methods to appraise the quality of IA. Section 3 introduces data collection and methods. Section 4 presents our findings and Section 5 contains a discussion of our evidence. Section 6 is devoted to our conclusions and policy implications.

2. Measuring the quality of impact assessments: literature review and overview of the methods

Given this widespread usage, there is a lively discussion on whether and to what extent the IA system has been successful in the UK and the EU. The literature has produced different benchmarks of success. At the basic level, scholars explore whether departments engage with the process of producing an IA or produce 'back-of-the-envelope' estimates when the specific content of the proposal has already been agreed. Previous research has shown that in some countries the symbolic and perfunctory production of IA is frequent (AUTHOR B, 2010; Hertin et al. 2009).

At the opposite side of the spectrum, the most ambitious benchmark revolves around the question whether the IAs present high-quality and well-balanced analyses on basis of reliable data and whether these analyses are effectively used by decision makers and generate various types of policy learning (AUTHOR B, 2009; Nilsson et al., 2008, Owens et al., 2004). The National Audit Office (2009) has included this benchmark in its reports on the quality of IA in the UK. This demanding approach practically suggests a replication of the analyses carried out by the authors of the IA, thereby requiring the original data in possession of the officers, interdisciplinary skills to analyse those data, and resource-intensive methodologies such as interviews and document analyses in order to study the effects of IA on policy.

This article is informed by a third approach focusing on the completeness and comprehensiveness of information provided in an IA document. This benchmark concerns the analysis of samples of IA to establish whether they provide the information that they are supposed to convey to decision makers, according to IA drafting guidance documents and good international practice. An important caveat is that by examining the quality of IA in this way we cannot say anything about the

usage, truthfulness and plausibility of the analyses presented - the latter can be established only via case studies or large surveys of officers with questions about when and how the IAs were used (see The Evaluation Partnership, 2007 and Nilsson et al., 2008).

How do we measure the quality of samples of individual IAs, then? Robert Hahn and his team (see, for instance, Hahn and Dudley, 2004) were the first to use the scorecard method in a US context. Using IA drafting and implementation guidelines as well as good international practices as benchmarks, researchers established a list of items that one can reasonably expect to be covered in an IA document. This includes the definition of the policy problem, the economic analysis of various forms of interventions to tackle the identified problem, effects on the economy, the social world and the environment, and also aspects of implementation and monitoring of upcoming policies. Trained coders would then measure the presence of those items in a particular IA, usually in a binary format (Yes / No or 0 / 1). In order to detect the presence or absence of scorecard items, coders would closely read the IA document and look for qualitative or quantitative evidence that the respective scorecard item had been considered during the drafting process of the IA.¹ The values of the items can be aggregated in indexes of quality.

The scorecard benchmark has been quickly imported into Europe. The UK's National Audit Office (2009) reports on the values taken from a simple scorecard, covering problem definition, consultation, economic analysis, and monitoring and evaluation. A team of US and European authors have used a variation of Hahn's scorecard to compare IAs in the US federal executive agencies and the European Commission (Cecot et al., 2008). Renda (2006) drew on the scorecard method to generate a study of the quality of IAs produced by the European Commission during the first three years of the EU's IA system (2003-2005). At that time, Renda found that the European Commission was having difficulties in the economic analysis of proposals. Ambler et al. (2007) have used scorecards to appraise the quality of IA in the UK, in some cases making comparisons between the UK and the Commission's IAs. Their conclusions across the years were negative, the common finding being that 'the IA system is not working in the UK'. However, the scorecard method comes with a number of weaknesses that we discuss below:

First, any analysis should be commensurate with the importance and content of the proposal. To illustrate, in the UK and the EU 'more analysis' is required for proposals that affect a large cross-section of stakeholders and sectors – this is a basic principle of proportionate analysis. To classify an

¹ UK IA documents are based on templates that include several tick-the-box items such as 'has no effect on race equality'. In those cases, we only assigned 'Yes' / 1-values (indicating the presence of a specific scorecard item in an IA) if the author provided sufficient qualitative or quantitative evidence that such a test as really been carried out or if the author gave a plausible reason why such a test is irrelevant in the respective policy context. If such evidence or plausible reason is missing, we assigned a 'No' / 0-value, indicating that the scorecard item is actually missing in the IA.

IA as incomplete, i.e. to assign a 0-value on one or more specific scorecard items and in conclusion to suggest a lower overall quality score, because the IA does not, for example, quantify all costs and benefits may miss the point if the IA was carried out on a narrow modification of existing legislation.

In order to address this concern, we entered a ‘Yes’ value when the IA explained why a certain scorecard item was not addressed in the IA. This reduces bias because if the IA explains why a scorecard item, e.g. the effects of a policy proposal on gender, was irrelevant in the specific case under consideration, there is evidence that the regulator considered this aspect. Previous studies instead looked only at how many items were calculated and how many were not without taking into account plausible reasons for the presence or absence of scorecard items..

Second, the IA guidelines have changed in the UK and the European Commission twice every ten years or so. What is ‘mandatory’ today might have been ‘optional’ six years ago. Comparing IAs across years and jurisdictions without taking into account the different IA guideline requirements would therefore introduce into our study a serious source of bias.

In response to this problem, we improved on comparability. Our scorecard is based on the 2009 EU and the 2007 UK IA guidelines, respectively. We have selected items that are commonly included in all IA guidelines, and were indeed present in previous versions of the guidelines both in the EU and in the UK. Hence we did not consider items that were a key requirement in one jurisdiction’s guidelines but not in the other, e.g. tests on the EU’s subsidiarity principle that are hardly applicable to the UK.

Table 1 about here.

In terms of data, we coded all EU IAs on binding legislative proposals² produced from 2005 to 2010 (see Table 1). The data were taken from the EU’s IA depository.³ The UK production exceeds by far the production of the EU. On average, the UK produces 320 IAs a year, the European Commission only 93. We therefore created a complete database of all UK IAs produced between 2005 and 2010 from the official websites and the government’s command papers. We then extracted a representative sample of some 500, stratified by departments and year (2005 to 2010).

3. Evidence

2 That is, IAs for regulations, directives, and decisions. Although we have data also on IAs for non-binding EU proposals, these were not used in this study as they cover instruments that may not correspond to policy initiatives in the UK. In other words, this reduces the risk of comparing apples with oranges.

3 http://ec.europa.eu/governance/impact/ia_carried_out/cia_2012_en.htm

We coded and measured a large number of items for the UK and the EU, thereby covering all major requirements to be found in UK and EU IA guidelines. In this article, we restrict ourselves to the most important results concerning costs and benefits of regulation, and contrast these findings with a control group of scorecard items not related to costs-benefit analysis, e.g. policy options and various kinds of policy impacts. We leave aspects such as problem definition, consultation, monitoring and evaluation to other articles arising from this project. The basic elements of economic analysis concern the identification of costs and benefits, their quantification (in a metric other than monetary way, i.e. in terms of number of lives saved) and their monetisation. Table 2 presents the main findings. The official guidelines suggest that ranges and intervals may be appropriate ways to take uncertainty about the future into account.

Table 2 about here

Although practically all the IAs perform the basic function of stating that regulation has at least some costs and some benefits, there is a slight difference between the UK and the EU. The former seems to be inclined to stress the cost-side of regulation, whilst the EU is more attentive to benefits (see Table 2, columns 1 and 2). This finding seems to corroborate previous studies that have pointed to a cost-reduction emphasis in the UK regulatory reform initiatives and a trend towards wider governance models for the EU IA (Radaelli, 2005.)

Turning to quantification, the data show that the UK and the EU started from different levels of capacity to quantify costs and benefits. In 2005, only about one in four IAs of the Commission quantified benefits, whilst in the UK 44.7 per cent contained benefit quantification. The gap in cost quantification was also stark. Five years later, in 2010, the gap between the UK and the Commission in terms of benefit quantification had disappeared, and the gap in cost quantification is now in favour of the European Commission. In contrast to the negative conclusions reached by previous studies, our findings suggest that the European Commission has successfully institutionalised its assessment system and developed capacity in a short time-span, a point already noted by qualitative studies carried out in recent years (Radaelli and Meuwese, 2010). The surge in quantification is not a consequence of the diffusion of the Standard-Cost Model⁴, which is not often used for the measurement of administrative burden.

Regarding the further step of monetising costs, the data reveal two different periods for the European Commission: a period of low capacity in 2005 and 2006, and a period of increased monetisation of costs between 2007 and 2010, with a slight decrease in 2009. The pattern for the UK has no obvious interruptions until 2009 and is characterised by steady improvement until 2009 but a

⁴ The Standard-Cost Model is an assessment tool developed in the Netherlands with a view to estimate the administrative burdens of upcoming or existing policies on a specific sector. It mainly relies on surveys and qualitative interview with businesses. Micro figures on individual businesses are then related to the number of businesses in a sector in order to provide a quantitative measure of burdens.

slight decrease in 2010. Across the years, the gap between the UK and the EU narrows and eventually the EU overtakes the UK in terms of monetisation of at least some costs in an IA. The nature of regulatory proposals in a particular year may affect the results about monetisation.

As for benefit monetisation, the data confirm that this remains a difficult task, both for the EU and the UK. In both cases, however, the effort is visible when 2005 data is compared to more recent data. Finally, the IA officers are still reluctant to take into account intervals and ranges for costs and benefits. In fairness, the presence of wide intervals for benefit and cost estimations complicate the identification of an option that is clearly superior to others. Thus, the low propensity to use intervals may be related to notions according to which IAs have to identify options that are superior to others.

We now contrast these results with the findings that go beyond the dimension of cost-benefit analysis. In Table 3 we report data on the degree of detail of policy objectives, types of policy intervention, and three aggregate categories measuring whether economic, social and environmental impacts have been calculated.

Table 3 about here

First, we measure the extent to which impact assessments come with policy objectives that are operational and provide the basis for potential ex-post evaluations. After all, operational objectives are a vital precondition for the effective monitoring and assessment of policy effectiveness. In this respect, the EU shows rather erratic behaviour, but seems to plateau around a 66 per cent figure, in contrast to the UK, where operational objectives were identified in one fifth of all IAs only. However, the UK's 2010 value is the highest measured since 2005.

Second, in order to explore the degree to which policy makers consider modes of regulation other than command and control, we coded the degree to which IAs discuss options like co-regulation, self-regulation, or market-based instruments. On average, 42 per cent of all EU IAs consider types of intervention beyond top-down regulation with constant improvements over time from around 20 up to 50 per cent and yet again a drop in 2010. UK assessments, by contrast, provide less often assessments of alternative modes of intervention; on average only one quarter of all IAs discusses policy options other than command-and-control. Further, there is no systematic pattern over time: while in 2006 almost a third of all British IAs discuss various forms of state intervention, two years later only 15 per cent of all assessments feature this scorecard item.

Third, with regard to the comprehensiveness of an impact assessment system, we developed three aggregate values on impacts related to the economy, society and the environment. IA consider economic impacts if they discuss the effects of proposed policies on competitiveness, competition, small and medium enterprises, investment and innovation, economic growth, trade, or inflation. We also speak of economic effects when administrative burdens for enterprises of all sizes are included. The data shows that both the UK and the EU have achieved a high level of this type of broad

economic analysis, with more than 90 per cent of all IAs elaborating on the effects of proposed legislation on the economy. Social impacts have attracted less attention in both jurisdictions but still show high degrees of coverage. This category aggregates the presence of scorecard items on health and safety, employment, social inclusion, non-discrimination and gender equality as well as education. While the EU assesses social impacts almost as often as economic impacts, there is a clear divide in the UK, where social impacts are covered less rigorously than economic ones. The 2010 data demonstrate, however, that the UK has made steady improvement on assessing social impacts, receiving similar scores as the EU. Environmental impacts, an aggregate of estimated effects on water, air, biodiversity, the climate, and energy use, play a relatively minor role in the UK. In Britain, only 29 per cent of all IAs feature assessments of how policies impact on our natural environment – although we observe a slow but steady upward trend. This figure might be surprising given that the UK guidelines require tests such as on the effects of policies on our natural environment or on social impacts. IA templates also make the provision of such information mandatory. However, these templates largely rely on tick-the-box exercises. As discussed above, we therefore only assigned ‘yes’ / 1-values to a specific scorecard item if the IA came with sufficient evidence that such a test has actually been carried out or if a plausible reason was given why such a test was unreasonable in that specific policy context.

In the EU, by contrast, 60 per cent of all IAs discuss environmental impacts. The relatively high scores in the EU on social impacts, in contrast to environmental effects, may be due to the adoption of dedicated social assessment guidelines, developed by DG Employment, Social Affairs, and Equal Opportunities, which were referenced by the 2009 EU IA guidelines. Specific separate guidance documents on social impacts, as well as a separate guideline on fundamental rights, are now available on the Commission’s website.⁵

Table 4 about here

As Table 4 demonstrates, the assessment of administrative burdens of new regulation is still problematic, with a dip in the UK for 2010. With regard to administrative burdens for the business community and public bodies, UK scores have not changed very much since 2005; 37.7 and 33.3 per cent of all UK IAs assess these burdens. EU IAs have rarely assessed these burdens in 2005 and 2006 yet have improved since with average scores of around 25 per cent each. As our data shows, the assessment of administrative burdens for citizens plays a marginal role in the two jurisdictions.

5. Discussion

⁵ Further details and the full guidelines can be found at <http://ec.europa.eu/social/main.jsp?catId=760&langId=en&preview=cHJldmld0VtcGxQb3J0YWwh>

Our data suggest similarities, but also differences between the UK and the EU in assessing the impacts of policy proposals. We discuss these differences in relation to three broad categories: time, areas of analysis, and specific events. First, we observe a steady improvement over time. This is true for most scorecard items related to costs and benefits. Likewise, the presence of non-CBA scorecard items has increased between 2005 and 2010 in both the UK and the EU. Learning through practice and the gradual institutionalisation of IA in the British and European policy-making processes might be potential causes of this development. Major elements of learning and institutionalisation are, on the one hand, the publication and increased salience of IA guidance documents. On the other hand, the varied coverage of particular scorecard items in Britain and the EU might result in specific social norms and expectations, on the side of both policy-makers and regulated actors who expect a set of items to be discussed and therefore create communities of practice and routines. In particular, relatively high scores on CBA and economic impacts in the UK benefit from the long tradition of cost-related assessment in various guises in Britain.

Second, economic and cost-related assessments receive on average higher scores than assessments of environmental or social impacts, policy options, or policy objectives. This can plausibly be traced back to the history of IA that developed from benefit-cost foundations in the US. However, one might also think of interaction effects between EU impact assessments and domestic analyses conducted in member states such as the UK. For instance, much of the UK's environmental regulation today originated years before in Brussels. We were surprised to see similarities between the EU and the UK when it comes to economic analysis. We expected that the monetisation and quantification aspects are much more difficult to deal with for a complex economic system (despite the common market) such as the EU-27 than for a single economic system as the UK. After all, entities like 'single point estimations' are a tall order for the EU-27. Likewise, social or environmental impacts are much more diverse for the EU-27 than for a single country. Our findings, however, suggest that the UK and the EU perform equally well in many dimensions, defying our initial expectations of the EU estimates being more problematic and less likely to materialise in the IAs. Obviously, this does not tell us whether economic analyses for the EU-27 are better than those for the UK. In the absence of ex-post studies on the accuracy of economic estimates, nothing can be said on this important point.

Third, specific events represent turning points in British and EU impact assessment. In particular, 2009 was a significant year for the European Commission and coincided with three events that had the potential to affect the overall IA process: the entry into force of a new set of IA guidelines, the election of the new European Parliament for the term 2009 to 2014 and, last but not least, the renewal of the College of Commissioners with the start of the Barroso II Cabinet. We cannot make sound inferences on whether elections in the European Parliament and a new Cabinet of Commissioners affect incentives for individual IA drafters. To be sure, changes in the Commission are

associated with some reshuffling across departments. EU IAs in 2009 and 2010 show a deterioration in terms of quantification and monetisation. This could be the result of more pressure to deliver the proposals to the legislator before the change of the Commission, which in turn reduced the time spent on appraisal. Further, due to the financial crisis, several policy initiatives had to be undertaken with no IA at that time, or with a rushed and rough IA. More importantly, the quality of EU IAs seem to be positively affected by the creation of the IAB. In 2007, when the IAB became operational, several indicators show a sharp increase in the order of magnitude of 20 to 30%, e.g. for the quantification of costs and benefits, the monetisation of costs and benefits, and the evaluation of the three main categories of impacts. The IAB may have behaved as an effective gatekeeper and increased the compliance with existing IA guidelines.

For the UK, the key year to consider is 2007, when the guidelines were changed in order to stimulate deeper and better economic analysis. In particular, the 2007 guidelines came along with two summary pages dedicated to policy objectives, costs and benefits, enforcement costs, and selected economic costs and burdens. We therefore expected 2008 and later years to reflect this change. Our findings do indeed show considerable improvements in 2008 and 2009 in those categories that had not yet reached the ‘plateau’ of 90 per cent and more, for instance regarding the quantification and monetisation of costs and benefits.⁶

6. Conclusions

In contrast to previous studies, we found that IA has now become a stable component of pre-legislative scrutiny. Changes over time point towards richer analysis over the years, with a dip in 2010 though –as mentioned, further analysis should control for the content of proposals in 2010, looking at policy sectors and types of regulatory instruments. Analytical dimensions that had been neglected in the past are now addressed by the regulators. We noted improvement in the consideration of social and environmental effects, and on the range of regulatory options beyond command-and-control. Learning-in-time has made a difference. We cannot infer from the data the weight of variables such as robust oversight, infra-organisational learning, and more precise guidelines. Yet these factors have most likely played a role.

Turning to current policy discussions about independent oversight (Gibbons and Parker, 2012), there is a lively discussion on whether the IAB should be more independent (European Parliament, 2011) along the lines of the UK’s Regulatory Policy Committee. In light of our evidence, this issue seems less important once we observe that economic analysis and the identification of costs and benefits are uniformly high in both the UK and the EU. If (and this is a big ‘if’ at this stage of our

⁶ We do acknowledge the possibility that the nature of the regulatory proposals in a particular year may affect the results. However, we have no way of comparing the nature of regulatory proposals year by year at this point of our analysis. We will carry out a more fine-grained analysis of the data in the future.

research) this result is caused by oversight, there is no systematic difference between using one type of oversight body or another. However, regulatory oversight bodies are established for a set of reasons: deeper economic analysis is important, but it is not necessarily the main reason.

Previous research highlighted the problem of poor economic analysis. Our method does not tell us whether in a given item (say, social effects or the environmental costs of a new proposal) the regulator has carried out good or bad analysis. To do so, one has to practically re-run the IA and answer the question whether better evidence on social effects or environmental costs was available and was not used. We adopted a much narrower definition of quality – that is, comprehensive consideration of what the official guidelines say. We have also reasoned that when there is no point in examining a given category of costs and benefits in an IA, the coding should not report this as 0. But clearly when we entered a 1 we were unable to say whether the IA item was filled in with the best available evidence and analysis, or average, or poor. If we look at our admittedly narrow approach to quality, suitable for a large-n analysis, the two systems seem to live up to their expectations: IA in the UK and the EU has become an instrument geared towards the economic analysis of policy proposals. The EU, however, seems to have made an effort to stay close to the original template of integrated impact assessment, outperforming the UK on the estimation of social and environmental effects. For instance, the emphasis on setting specific and operational objectives is on the rise, thereby suggesting a sort of paradigm shift from a US-style IA to an IA model geared towards policy consistency and coherence. In this sense, the EU system is broader and not exclusively oriented to the economic dimension. If we narrow down economic analysis to specific items of cost-benefit analysis, we see that quantification and monetisation are still relatively problematic areas. But yet again, the EU and the UK do not differ significantly here. The absence of quantification and monetisation in so many IAs may result from the fact that at the moment there are no suitable data, or that it did not make sense to invest a lot of time and resources in these steps, given the limited expected effect of the proposals. One way to control for this is to check whether larger IAs (in terms of total expected costs for example) have on average more depth in quantification than narrower IAs. This is something that could be addressed in future research.

Future research could also explore variability across government departments or DGs. Do departments provide particularly good analyses in the domains where they have core competences, or do they follow requirements laid down in the guidelines across the board? Which analytical dimensions are of particular importance for what category of departments? Likewise, exploring the full set of dimensions that make up an IA, including consultation, monitoring and evaluation, will give us a more comprehensive understanding of the quality of this policy instrument. Finally, data like ours should be connected to other data on utilization, such as whether decision-makers use the IAs and for what purposes.

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	UK (SAMPLE)	EU (UNIVERSE)
2005	85	41
2006	93	35
2007	81	49
2008	94	83
2009	82	43
2010	42	45
TOTAL	477	296

Table 1. Number of IAs coded for the UK and the EU, by year

	Identified costs		Identified benefits		Quantified costs		Quantified benefits		Monetised costs		Monetised benefits		Calculated range for costs		Calculated range for benefits	
	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU
2005	90,6%	82,9%	88,2%	97,6%	67,1%	46,3%	44,7%	24,4%	57,6%	46,3%	34,1%	19,5%	14,1%	7,3%	4,7%	4,9%
2006	89,2%	97,1%	84,9%	100,0%	66,7%	54,3%	53,8%	37,1%	61,3%	51,4%	36,6%	34,3%	15,1%	14,3%	9,7%	5,7%
2007	96,3%	98,0%	86,4%	100,0%	77,8%	81,6%	58,0%	67,3%	69,1%	79,6%	42,0%	53,1%	17,3%	6,1%	13,6%	14,3%
2008	91,5%	98,8%	86,2%	98,8%	78,7%	91,6%	71,3%	74,7%	76,6%	89,2%	67,0%	62,7%	21,3%	30,1%	24,5%	21,7%
2009	97,6%	100,0%	89,0%	97,7%	85,4%	93,0%	62,2%	60,5%	81,7%	86,1%	60,1%	51,2%	25,6%	14,0%	22,0%	11,6%
2010	96,4%	100,0%	91,1%	97,8%	80,4%	80,0%	57,1%	42,2%	72,2%	80,0%	57,1%	33,3%	26,8%	33,3%	23,2%	13,3%
Average	93,4%	96,6%	87,2%	98,7%	75,6%	77,7%	57,4%	55,1%	69,8%	75,3%	48,8%	45,6%	19,2%	19,3%	18,0%	13,5%

Table 2. Percentage of IAs that identify, quantify, monetise costs and benefits of regulation over years; use of intervals for the estimation of costs and benefits, by year

	Identified operational objectives		Assesses policy options for co-, self- or market-based regulation		Calculated net benefits or cost effectiveness		Evaluated economic impacts		Evaluated social impacts		Evaluated environmental impacts	
	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU	UK	EU
2005	20,0%	58,5%	25,9%	19,5%	3,5%	9,8%	95,3%	80,5%	77,6%	85,4%	23,5%	39,0%
2006	26,9%	42,9%	32,3%	34,3%	3,2%	14,3%	94,6%	80,0%	69,9%	74,3%	26,9%	42,9%
2007	23,5%	36,7%	29,6%	42,9%	16,0%	26,5%	93,8%	100,0%	59,3%	89,8%	28,4%	61,2%
2008	20,2%	59,0%	14,9%	53,0%	54,3%	27,7%	88,3%	100,0%	67,0%	90,4%	30,9%	78,3%
2009	17,1%	60,5%	28,0%	48,8%	61,0%	18,6%	90,2%	97,7%	80,5%	93,0%	34,1%	60,5%
2010	30,4%	66,7%	26,8%	40,0%	50,9%	15,6%	91,1%	100,0%	75,0%	75,6%	32,1%	64,4%
Average	22,2%	54,7%	26,0%	41,9%	31,6%	20,3%	91,8%	94,6%	70,8%	85,8%	28,6%	61,2%

Table 3. Percentage of IAs reporting on policy objectives, types of intervention and various categories of impact

	Assesses impact on administrative burdens		Quantifies administrative burdens for business		Quantifies administrative burdens for citizens		Quantifies administrative burdens for public bodies	
	UK	EU	UK	EU	UK	EU	UK	EU
2005	61,2%	31,7%	42,4%	4,9%	2,4%	0,0%	34,1%	2,4%
2006	60,2%	31,4%	36,6%	0,0%	3,2%	2,9%	33,3%	17,1%
2007	70,4%	71,4%	37,1%	34,7%	3,7%	2,0%	38,3%	22,5%
2008	60,6%	73,5%	38,3%	41,0%	4,3%	1,2%	33,0%	41,0%
2009	72,0%	65,1%	46,3%	16,3%	0,0%	0,0%	35,4%	14,0%
2010	53,4%	75,6%	26,8%	31,1%	3,6%	0,0%	30,4%	37,8%
Average	62,2%	61,5%	37,8%	25,0%	2,8%	1,0%	33,6%	25,3%

Table 4. Percentage of IAs reporting on administrative burdens