

From Nothing to Too Much: Regulatory Reform in Greece

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Abstract

After many years of an impasse in attempts to introduce Regulatory Impact Assessment to Greece the Greek Prime Minister announced in July of 2006 the introduction of a very ambitious Integrated Impact Assessment on the economy, the society and the environment. The model presented was at the same time ambitious and unsophisticated with some obvious methodological problems. To make the situation worse, an impact assessment analysis should accompany every law and every regulation of every Ministry and every Region although the experts who can undertake this task in Greece are very few. The first RIAs (which are not publicly available) proved to be of a very low quality and extremely simplistic. The introduction of such a system in Greece is certainly a positive step, however it should be limited (at least in the initial stage) to an *ex ante* and an *ex post* assessment only of the major laws and regulations. The whole procedure should be controlled and supervised by a central regulatory watchdog with veto power. But even for this less ambitious system to work, cultural change is necessary which includes the creation of a pool of experts.

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*Si vis ad summum progredi ab infimo ordine*¹
Publilius Syrus

A Short History of Regulatory Reform in Greece

In late August of 2006, the major Sunday newspaper in Greece announced in a first-page story² that the Greek Prime Minister took a very important initiative for the control of chaos in the Greek regulatory environment. The title of the article was rather misleading: “Ministers under Close Watch by the Prime Minister”. The subtitle of the article was more informative: “Mr. Karamanlis is trying to put an end to the abuse of regulatory acts and to establish some rules for their drafting”. The author of the article is a well-known journalist with expertise on public administration issues and the article was very comprehensive and well-informed.

However, the same journalist in the same newspaper had presented (again as upcoming) five years earlier (in April, 1, 2001) a similar ambitious initiative by the then Prime Minister of Greece, the socialist Kostas Simitis.³ Simitis has already supported the broad regulatory reform in the European Union and the member-states as a prerequisite for achieving the Lisbon Goal of stimulating growth and employment. The goal of the announced reform was to ensure a better economic environment for economic growth by removing administrative burdens, boosting business activity and protecting consumers.

Unfortunately, this announcement proved to be a case of April’s fool despite the efforts of several experts.

¹ “If you wish to reach the highest, begin at the lowest”.

² D. Nikolakopoulos, “Ministers Under Close Watch by the Prime Minister” (*To Vima*, August 27, 2006) [*in Greek*].

³ D. Nikolakopoulos, “The Law on Law-Making Goes to the Parliament” (*To Vima*, April 1, 2001) [*in Greek*].

The first official report which recommended the introduction of RIA dates back to 1998.⁴ According to the “Spraos report”, Greece missed out on two major revolutions in the field of public administration. It stated that these two "revolutions" concern the public sector's proper and efficient functioning. The report contained five sets of proposals. The first referred to the introduction of result-measurement indicators, respect for charters of citizens' rights, and efficiency controls of public services, while the third envisaged the setting up of a committee of experts that will examine the relevance and impact of legislative regulations. The fourth and fifth proposals were related to the establishment of two bodies, one comprised of administration economists and the other of high-ranking executives with special skills and qualifications. Three years later, the Ministry of the Interior, Public Administration and Decentralization adopted a national reform program entitled *Politeia*. This Program tried to establish a national strategy for regulatory reform and better regulation policy.

In June 2001 a group of experts (Regulatory Reform Committee) was appointed to prepare the law (with Michail Vrontakis, a vice-president of the Greek *Conseil D'Etat* as Chairman) for law-making with an emphasis on regulatory reform and better regulation, including the introduction of a RIA procedure concentrated on the economic impact. The group of experts did a very good job. It submitted to the Ministry of the Interior, Public Administration and Decentralization the draft law “Control of Quality of Regulation”. This draft law included new procedures for a more efficient and effective legislative and regulation-making process. It included the creation of a special Central Unit for the control of the quality of new regulations in the General Secretariat of the Council of the Ministers. This unit would also be responsible for supervising the new RIA-units in every ministry. It would also check the quality of the RIAs and it would have had the power to reject a law if the accompanying RIA did not meet a set of criteria. However (and despite the efforts of several people in the then Government and the expert group) this law was never introduced to the Parliament.

After the elections of March 2004 the conservative party came to power with one of its main programmatic proclamations being the “Reconstitution of the State” (reminiscent of Reinventing Government) and the “New Governance”. Nevertheless, the process for regulatory reform got sidetracked for more than two years. In August of 2004 the responsible Minister of Public

⁴ See the report submitted by Prof. Ioannis Spraos, who at the time was the prime minister's (Kostas Simitis) economic advisor on the qualitative improvement of Greece's massive public sector administration (January 13, 1998) [*in Greek*].

Administration Prof. Prokopis Pavlopoulos announced a “better regulation” bill entitled “Quality Control for Laws and Regulations”⁵. Its main provision was the introduction of a RIA system to assess the economic, social and environmental impact of regulations. A special unit in every Ministry and in the 13 Regions would be responsible for the drafting of impact assessment for every regulation with a large expected impact on the economy. These units as well as the whole procedure would be supervised by a Central Agency for the Control of Regulatory Quality.

This bill was never introduced to the Parliament even though Mr. Pavlopoulos announced it again, a year later in a speech to the Federation of Greek Industries⁶ in which he emphasized (as expected) the assessment of the impact of proposed regulations on competitiveness and businesses’ compliance costs. This delay led to inter-governmental frictions since regulatory reform was one of the major pledges of the conservatives during the elections of 2004.⁷

For all these reasons, the newspaper story presented in August of 2006 would have again sounded like empty rhetoric especially because its phrasing and its ambitious character were identical to all similar declarations of the former Socialist and the current Conservative Government.⁸ But this was not the case since there was a photo of a memo sent by the prime minister to the Ministers, all the major officials in the government and the general secretaries of the Regions on July 18, 2006. With this document (and not with a law) a very ambitious RIA system was actually introduced in Greece for the first time. Eighteen months later the system has been working and at least ten RIAs on major legislation have been “published”. However,

⁵ Prokopis Pavlopoulos, “Statement after the meeting of the Governmental Board” (August 17, 2004) [*in Greek*].

⁶ Prokopis Pavlopoulos, “For a More Efficient Legislation and Regulation: Impact on Competitiveness and Cost”, Speech at the Greek Federation of Industries (June 16, 2005) [*in Greek*]. See also his speech (a few days earlier) at the National Center for Public Administration (May 24, 2005) [*in Greek*].

⁷ The idea of “reconstituting government” as one of the pillars of the conservative party’s election policy was due to Prof. Ant. Makrydimitris, a Professor at the University of Athens and an advisor of Greek Prime Minister after the elections. Makrydimitris was instrumental in promoting the new RIA system, sometimes in conflict with ministers with a different agenda. See D. Nikolakopoulos, “Reconstitution of Government only on Paper” (*To Vima* May 29, 2005) [*in Greek*].

⁸ Both major political parties in Greece (the conservative “New Democracy” and the social-democratic “Panhellenic Socialist Party”) have similar views on regulatory reform and better regulation. The consensus is based on the declared willingness to follow Europe’s avant-garde since both parties are very positive to the process of political unification of the European Union. However, see P. Karkatsoulis, “The Change of Changes: How Do (Structural) Changes Change?” (*PPOL.gr*, June 15, 2005). <http://www.ppol.gr/fullarticle.php?id=1281> [*in Greek*].

before we present the new Greek system on impact assessment and the first RIAs we should briefly describe the situation in Greece before the introduction of the new RIA system.

Regulatory Impact Assessment was purely informal and sporadic.⁹ All legislative proposals, including amendments has to be accompanied by a justification report and by a budgetary impact report (a fiscal analysis) mandated by the Greek Constitution and prepared initially by the ministry. The final report is approved or modified by the General Accounts Office of Ministry of Finance. This Budgetary Impact Report is submitted to the Parliament which cannot discuss or vote on a bill without it.

Some independent regulatory authorities (such as the “Regulatory Authority for Energy” and the “National Telecommunications and Post Commission”) had introduced a rather informal system of *ex ante* as well as *ex post* assessment based on CBA. A few selective Environmental Impact Analyses have been conducted for big public and private projects on investments after 1986.¹⁰

Public consultation was not mandatory; it was also informal and covered a rather short period of time (no more than 45 days). There were several programs on regulatory reform, concentrated mainly on the codification and simplification of existing regulations with some visible results especially in e-government, compliance costs for business and tax law.

However, the structure and effectiveness of Greek Public Administration was (and still is) very problematic, giving rise to heated political debate. The reasons are many:

⁹ For more details, see OECD, *Regulatory Reform in Greece* [OECD Reviews of Regulatory Reform] (Paris: OECD, 2001), the “Report to the Ministers responsible for Public Administration in the EU member states on the progress of the implementation of the Mandelkern Report’s Action Plan on Better Regulation” submitted by the Ad Hoc Group of Experts on Better Regulation during the Hellenic Presidency (Athens, May 2003), esp. pp. 49-52 and the “Regulatory Impact Analysis (RIA) Inventory” published by the Public Governance Committee of the Public Governance and Territorial Development Directorate of OECD (Paris, April 15, 2004). See also P. Karkatsoulis, “Regulatory Impact Assessment in Greece” (presentation at the OECD’s GfD in Arab countries initiative, Tunis, February 15-16 , 2007). Karkatsoulis is a Policy Advisor to the Ministry of Interior, Public Administration and Decentralization and the leading expert on regulatory reform and impact assessment in Greece (he was also a member of the Mandelkern Group on Better Regulation).

¹⁰ See Law 1650/1986 and the Joint Ministerial Decision 75308/5512/1990 of the Minister of the Environment, Physical Planning and Public Works and the Deputy Minister of National Economy.

- The sheer number of laws and regulations. Since 1974 (restoration of democracy) more than 3600 laws were promulgated by the Parliament. To these laws we should add 5 times more presidential decrees and 63 times more ministerial decisions.¹¹
- The size and ineffectiveness of bureaucracy that leads to red-tape and severe compliance costs to businesses.¹²
- Corruption.¹³
- Lack of transparency and problematic access to regulations.¹⁴
- A culture of inefficiency, political patronage, state-managed growth and limited accountability.¹⁵

The OECD report on regulatory reform in Greece published in 2001 contained the best description of the situation in Greece and made a number of proposals for regulatory reform and better regulation which included suggestions to:

- Speed up and improve the implementation of regulatory reform by enhancing accountability in the central government for regulatory quality, and by promoting tools for regulatory quality throughout the public administration.
- Improve regulatory transparency through more systematic use of public consultation, continued clarification of procurement criteria, communication to affected members of the public, and codification.
- Intensify efforts to reduce administrative barriers to businesses by establishing a central registry of administrative procedures and licences, considering the “silence is consent” rule, and initiating a comprehensive review to determine how to reduce burdens.
- Combat regulatory inflation and update older regulations, review and evaluate existing regulations and paperwork.

¹¹ Karkatsoulis, *id.*

¹² D. Nikolakopoulos, “The VAT Bureaucracy Costs Us 8 Billion Euros” (*To Vima*, April 23, 2006) [*in Greek*]. The article presents a study of the National School of Public Administration supervised by P. Karkatsoulis, according to which the compliance cost of VAT regulations for businesses reaches the amount of €8 billion.

¹³ See Transparency International, “2007 Corruption Perceptions Index Regional Highlights: EU and Western Europe” (2007). Greece’s CPI score for 2007 is 4.6 (the worst in EU-15).

¹⁴ Even the parts of the Official Gazette that contain regulations are not free of charge.

¹⁵ See in general John S. Koliopoulos & Thanos M. Veremis, *Greece: A Modern Sequel* (New York: New York University Press, 2002) (esp. ch. 2).

- Encourage greater co-ordination between local government and the central administration by i) defining clearly relevant regulatory competencies for each level of government, ii) providing resources, people, and financing for delivery of services that those competencies dictate, and iii) assisting in the development of management capacities for quality regulation at all levels of administration.
- Improve mechanisms within the administration to produce quality outcomes for the citizens through further reform of the civil service.

The new policy on better regulation

On July 18, 2006 regulatory impact assessment was introduced to Greece with a circular from the Prime Minister's office.¹⁶ The subject of the circular (distributed to the Ministers, the Deputy Ministers, the Secretary General of the Government, the Secretaries General of the Ministries, and the Secretaries General of the Regions) was "Legislative policy and the assessment of quality and effectiveness of legislation and regulation".

The main target of the circular was to establish a procedure to improve the quality of law-making and establish a procedure for better regulation compatible with the Inter-institutional Agreement on better law-making¹⁷ and similar to the policies of other member states¹⁸ and the OECD. Emphasis (in the preamble) is given to economic impact assessment, especially to the impact on competitiveness as well as to the reduction of compliance costs.

The new agenda for better regulation should be based on two pillars:

1. The observance of the principles of better law-making:

- (a) necessity, suitability and proportionality
- (b) simplicity and clarity

¹⁶ Prime Minister's Office, Circular Y190 (July 18, 2006) [*in Greek*].

¹⁷ OJ 2003/C321/01, December 23, 2003.

¹⁸ The circular cites the policies in Great Britain, Germany, France, Finland, Denmark and the Netherlands (with this order).

- (c) legality and harmonization with EU law, the Charter of Fundamental Rights of the European Union and the decisions of the European Court of Human Rights
- (d) efficiency and cost-effectiveness
- (e) transparency

2. A procedure of better regulation which includes:

- (a) an identification of the problem to be solved by the proposed regulation
- (b) an *ex ante* impact assessment of the proposed regulation on the
 - economy (on competitiveness, markets, commerce, investment, transaction costs, compliance costs and administrative burdens imposed on businesses - esp. of SMEs-, consumer protection, specific sectors, and to the labor force)
 - society (on labor market, employment, gender mainstreaming, equal opportunities, social rights, consumer rights, public health and public safety, access to education and to social welfare services)
 - environment and sustainable development (esp. on environmental risks)
- (c) comparison of different regulatory options
- (d) social consensus through public consultation, deliberation and participation (esp. with the use of the Internet)

The circular introduces the first comprehensive and overly ambitious RIA system in Greece. The main elements of the new system are the following:

- The whole project is supervised by the General Secretariat of the Government (GSG)
- Every Ministry and every region should establish a special Regulatory Quality Assessment Unit (RQAU). Alternatively a current unit in the ministry or the region should undertake the task. They should inform the GSG until September 30, 2006 (i.e. two months after the receipt of the circular)¹⁹ about their specific action plans in relation to the circular and appoint a liaison with GSG.
- The RQAU should draw an *ex ante* “Regulatory Impact Assessment Report” which should be submitted to the GSG.

¹⁹ To say that from late July to early September the Greek Public Administration operates partially is an understatement.

- GSG coordinates the procedure and assists the RQAUs with relevant expertise. But it lacks the power to reject RIAs of low quality.
- After a year of the enforcement of a law another ex post RIA should be submitted by the Ministry or the Region to GSG with suggestions for improvement of the law if necessary (especially concerning the impact on SMEs). The final draft of these *ex post* RIAs should be submitted to the Prime Minister 15 months (at the latest) after the enforcement of the law.
- There is also a recommendation to the authorities not covered by this circular (e.g. the independent regulatory authorities, the prefectures, etc.) to adhere to the principles of better regulation.

With the exception of some (rather short) newspaper articles, including the major one we mentioned in the beginning of the paper, the reaction to the introduction of RIA in Greece was minimal.²⁰ One of the major exceptions was a report by the Foundation for Economic and Industrial Research which applauded the introduction of RIA but had reservations about the fact that the RIAs will be drafted by the Ministries themselves and not by an independent agency.²¹

For these reasons the reaction by the Ministries and the Regions was lethargic. The only agency that seemed to care was GSG²² which on February 2, 2007 sent to the relevant agencies²³ in the Ministries a model of a RIA Report (see the appendix) and a manual with guidelines. These two documents were accompanied by a letter by the General Secretariat of the Government²⁴ requesting that the Ministries make sure that “every legislative proposal to be sent to GSG should be accompanied by a RIA”. There was no reference to regulations.

²⁰ We mean positive reaction because we could not find any kind of negative reaction on better regulation and impact assessment expressed in Greece for the past 5-6 years.

²¹ Foundation for Economic and Industrial Research, “Greek Economy: A Quarterly Report 2/2006” (Athens, n. 46, November 2006). FEIR was founded and supported by the Federation of Greek Industries.

²² See also Spyros Efstathopoulos, “A Better Quality of Laws for the Benefit of Citizens, Businesses and the Environment” (September 22, 2006) [*in Greek*]. Efstathopoulos is the Special Secretary for Competitiveness of the Greek Ministry of Development and a member of the Group of High Level National Regulatory Experts.

²³ As of today (a year after the Prime Minister’s circular) there is no establishment of an RQAU.

²⁴ Signed by its head, Argyrios Karras, Professor at the University of Athens Law School and Secretary of the Council of Ministers.

The main problem with the new system is its ambition. In a country with no relevant tradition what was introduced is a kind of Integrated Impact Assessment model which mandates the assessment of the economic, social and environmental impact of all proposed laws and all kinds of regulations (regardless of their expected impact) from all the Ministries and the Regions! There is no reference to a “dual stage” RIA model with a preliminary, simple impact assessment devoted to the analysis of alternative regulatory options and an extended impact assessment with the detailed assessment of the benefits and costs of the chosen regulatory option.

The overall quality of the new Greek RIA system is more than satisfactory considering the difficulties in introducing it but also the lack of tradition in Greek Public Administration. Nevertheless a number of possible problems could be easily identified even before its enforcement:²⁵

- (a) The assessment of the environmental and social impact is underdeveloped and unbalanced.
- (b) There is no real consideration of the alternatives, including the zero option.
- (c) The quantification of the impact is very limited and rather problematic. Costs for businesses are very difficult to be quantified under the particular framework. The same goes for the benefits (safety, health, environmental).
- (d) Costs and benefits are compared only in a few cases. The same goes for the costs and benefits of alternatives.
- (e) The methodology is sometimes questionable and oversimplified.
- (f) Soft-law, self- and co-regulation are rarely included in alternative options.
- (g) If an agency wishes to submit a RIA for every law and every regulation the burden will be enormous, especially given the fact that there is no personnel having the related expertise.

Additionally the RIAs are not available to the public. Even though this is not officially a pilot stage the RIAs are distributed only to the related agencies (not even to the Parliament!) and

²⁵ See Andrea Renda, *Impact Assessment in the EU: The State of the Art and the Art of the State* (Brussels: Centre for European Policy Studies, 2006), pp. 62-66 (for a scorecard analysis used extensively here).

they cannot be accessed by interested parties. The lack of transparency is unjustified especially since the lack of criticism and discussion will inevitably lead to low-quality RIAs.

Unfortunately the situation was even worse. The ten RIAs published so far had everything we have mentioned in the previous list. Another problem was the very low quality of some RIAs. An example is characteristic: In the RIA drafted by the Ministry of Justice on the introduction of the new Bankruptcy Code, the competent agency (not a special RQAU) declares that this Code was the only available option for the regulation of insolvency! The new code will have no impact whatsoever on the structure of the market and on the cost of establishment for new enterprises and no influence on the capability of enterprises to determine their policy (sic)! According to the same RIA, the new Bankruptcy Code will have no impact on employment and the job market...

We don't need to proceed much further. This RIA seems to be the result of an hour's work of some public employee who did not bother to even read the guidelines.

Another RIA from the General Secretariat for Consumer Protection on the introduction to Greek Consumer Law of the Directive 2005/29/EC of the European Parliament and of the Council was more carefully drafted but with many weaknesses and mistakes.

The third RIA drafted by a Special Unit for the Quality of Regulations at the GSG concerned the licensing and control of news media was the most sophisticated compared to the other two. However, it contained most of the weaknesses described above.

Two other RIAs have been published by the Ministry of Finance and Economics and despite some minor errors are quite satisfactory.

Unfortunately we were not able to find more information on the other 5 RIAs since their confidentiality does not exclude the authors of this essay!

Conclusions

Of course it is too early to evaluate the new Greek RIA system. On the other hand it is quite easy to identify all the possible problems given the history of regulatory reforms in Greece but also of other European countries with a much less problematic public sector.²⁶

- The new system is too ambitious and broad. It should be more proportionate and it should also be limited to laws and major regulations by Ministries with an expected major impact on the economy, society or the environment.
- It should be more flexible and sector-specific, especially for the sectors the OECD regulatory review identified (telecommunications, energy), as well as the high-tech industries and financial markets.
- It should also be more transparent. RIAs have not yet been made available to the public.
- *Ex-post* evaluation should be encouraged and connected to the *ex-ante* RIAs.
- A cultural change in the Greek administration with stronger accountability and performance-oriented behavior is also a sine-qua condition for the success of any initiative on better regulation.

Finally, the most important elements of the success are the following:

- (a) The establishment of a Central Regulatory Unit (a regulatory watchdog) with the authority to advocate, consult, supervise, reject and coordinate²⁷ better regulation in general and regulatory impact assessments in particular.
- (b) The staffing of this agency and all the related agencies in the Ministries by experts on regulatory reform and not by civil servants with no expertise, interest or willingness to

²⁶ Cf. Renda, *op. cit.* pp. 80-83.

²⁷ Renda, *op. cit.* 83.

learn. A special RQAU should be established in every Ministry and the entire staff involved in activities related to regulatory reform should be trained by practitioners and academics.

The introduction of a RIA system to Greece was a very positive step that put an end to an impasse of nearly ten years. However, the new system is undermined by its own ambitions and broadness and suffers from the lack of human capital. This again has to do with cultural change which, in the case of Greece, is the most difficult challenge of all.

APPENDIX

Regulatory Reform Regulatory Impact Assessment Report²⁸

(Model)

Identification of the proposed regulation

Ministry:

.....

Title of Proposed Regulation

Summary of the content of the proposed regulation:

Responsible for editing the Regulatory Impact Assessment Report

- Special Control Unit of the Quality of Regulation
- Competent agency

Please specify in greater detail:

²⁸ Translated by Sonia Nalpantidou & Aristides Hatzis.

Principles and Procedures of Better Regulation

1. Necessity

1.1. What type of problem is the proposed regulation trying to deal with? Define more specifically:

1.2. The regulatory intervention (legislative proposal) is necessary because of:

- Legal commitment (Greek Constitution, EU law)
- Social problem
- Economic problem
- New scientific and technological developments
- Other

Define more specifically:

1.3. Which social and economic groups does the proposed regulation concern?

Define more specifically:

1.4 What would the possible consequences be if the proposed regulation did not materialize?

- Not meeting deadlines
- Delay of the harmonizing process with community law
- Preservation of the current situation
- New regulatory initiative in a short period of time
- Impossibility of estimating the consequences

Define more specifically:

2. Suitability

2.1. What is the previous national and international experience for the resolution of this specific problem? Define in greater detail:

2.2. Were there other means of coping with the problem? If so, which were they and why was the proposed regulation chosen? Define more specifically:

2.3. What issues should the implementer pay special attention to in order to effectively accomplish the proposed regulation? Define more specifically:

3. Evaluation of the consequences

3.1. Economic consequences

3.1.1. Competition

3.1.1.1. Does the proposed regulation concern some categories of enterprises more than others? Yes or No?

Define more specifically:

3.1.1.2. Does the proposed regulation influence the structure of the market? Yes or No?

Define more specifically:

3.1.1.3. Does the proposed regulation lead to lower or higher cost of establishment for new enterprises? Define more specifically (with the help of cost benefit analysis):

3.1.1.4. Can the sector be described as a sector with radical technological development? Yes or No?

3.1.1.5. Does the proposed regulation expand or restrict the capability of the enterprises to choose the price, the quality, the breadth or the location of their products? Define more specifically:

3.1.2. Concerning the competitiveness of the enterprises

- The proposed regulation affects:
- operational cost (labor, taxation etc)
 - quality
 - innovation
 - export orientation
 - other

Define more specifically:

3.1.3. Concerning the enterprises and the investments

Define the cost of information and the cost of adjustment of the enterprises to the proposed regulation:

3.1.4. Concerning the small and medium-sized enterprises [SMEs]

3.1.4.1. What benefits would arise from the proposed regulation in favor of the SMEs? Define more specifically:

3.1.4.2.

What is the cost that would result from the proposed regulation for the SMEs?

- no cost
- taxes
- fines
- insurance premiums
- dues
- expenses of substantive compliance
- other

Determine more specifically:

3.2. For society

Consequences resulting from the proposed regulation for:

- employment and the job market
- the quality of jobs
- equal opportunities
- equality of the sexes
- the rights of consumers
- other

Determine more specifically:

3.3. For the natural and cultural environment

3.3.1. Consequences resulting from the proposed regulation for:

- sustainable development
- the reduction of environmental dangers
- the qualitative improvement of the environment

Determine more specifically:

3.3.2.

Has a study of sustainable impact assessment (environmental repercussions) on the proposed regulation been conducted?

YES or NO ?

Please attach the study if available

3.4. For the citizen

The benefits that would result from the proposed regulation for the citizen sum up to:

- reduction of required signatures in the public documents
- determination of a 50 day maximum time frame, within which the Administration has to answer
- quantitative reduction of requested documents for issuing an authorization /certificate
- creation of one stop services for citizens and enterprises
- decentralization of power to other administrative levels
- self-appointed search of supporting documents
- replacement of the obligation of producing supporting documents with the obligation of solemn statement
- other

Determine more specifically:

4. Legality, competence and expense

4.1. In what provisional frame of the Constitution is the proposed regulation included?

Determine more specifically:

4.2. What are the relevant provisions in European Community law and/or in the international conventions that Greece has ratified? Determine more specifically:

4.3. What are the relevant provisions in the European Convention of Human Rights and in the case law of European Court of Human Rights? Determine more specifically:

4.4. Which Ministries are competent and co-responsible for the proposed regulation? Report specifically the critical provisions, the competent Ministries for each relevant provision and the reasons of joint responsibility:

4.5. Has collaboration with the competent Ministries for the abovementioned provisions already taken place?

YES or NO ?

4.6. Does the proposed regulation provide for the establishment of a new institution, service, legal entity, committee, council or other collective body?

YES or NO ?

4.7. If yes, has a relative study of feasibility, an economical and technical study and a study of dealing with expenses been drawn up and has it been dispatched for consultation to the responsible Interministerial Committee [decision of Prime Minister Y 189/18-7-2006 (OFFICIAL GAZETTE OF THE HELLENIC REPUBLIC [B]' 953)?

YES or NO ?

4.8. Does the proposed regulation involve expenses or alleviation of income? Determine more specifically:

5. Simplicity - Clarity of content - Codification

5.1. The proposed regulation does not contain:

- programmatic statements
- technical terms, without sufficient clarifications
- foreign terms, without sufficient clarifications
- acronyms - abbreviations, without analysis the first time they are used
- hypothetical propositions - hypothetical syntax
- main sentences interpolated by secondary sentences
- transcendent form and other figures of speech

5.2. In the proposed regulation the following rules are observed:

- “each article does not have more than three paragraphs”
- “each paragraph does not have more than three proposals”
- “each proposal, one meaning”

5.3. The proposed regulation

- introduces a new legal rule
- modifies or replaces or suppresses an existing legal rule
- is included in existing regulation
- codifies

Determine more specifically the provisions that are modified, replaced, suppressed or included in existing regulation or are codified:

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6. Transparency - Social participation

6.1. Have the interested parties that are influenced by the proposed regulation been informed?

YES or NO?

6.2. The interested parties that are influenced by the proposed regulation were informed:

- by way of written communication
- through the Internet
- from the mass media

6.3. Has a social dialogue and consultation with the interested parties with regard to the proposed regulation taken place?

YES or NO?

6.4. Were all the interested parties invited to participate in the social dialogue and the consultation?

YES or NO?

6.5. Determine which agents from the list below were called to participate in the social dialogue and the consultation:

- Employers
- Employees
- Professionals (Lawyer's and Medical associations)
- Chambers ([EBEA], [TEE])
- Associations (of first, second and third degree)
- Non-governmental organizations [NGOs]
- Private citizens

6.6. The social dialogue and the consultation were realized via:

- The Economic and Social Committee (please attach the consultation)
- Work groups
- Teams of project management
- Public hearing, conference and discussion with the interested parties

6.7. The social dialogue and the consultation were realized:

- via the Internet
- via the distribution of public documents
- by observations and commentary

6.8. The social dialogue and the consultation lasted:

- up to 4 weeks
- from 4 to 8 weeks
- over 8 weeks

6.9. Has the process of social dialogue and consultation been completed?

YES or NO?

If not, determine the reasons:

6.10. Are there any opinions registered or submitted that were expressed during the social dialogue and the consultation?

YES or NO?

6.11. Were any reservations submitted?

a) About the process of social dialogue and the consultation?

YES or NO?

Determine more specifically:

b) About the content of the regulation?

YES or NO?

Determine more specifically:

6.12. Has social dialogue and consultation been foreseen for the stage of implementation of the regulation?

YES or NO?