SME CONNECT / BETTER REGULATION FORUM

RCC POLICY SUMMARY

Better Regulation as Regulatory Chain Control (RCC)

Integrated briefing package with political introduction, full policy summary and full-page infographic.

Prepared for discussion with the European Parliament, the European Commission and other actors in the EU regulatory chain.

EXPLORE THE BRIEFING

POLITICAL BRIEFING	POLICY SUMMARY	PILOT WORKFLOW	EU CASES	VISUAL ANNEX

A CONNECTED DECISION METHOD

EVIDENCE	RESPONSIBILITY	RESPONSE	VERIFICATION
Trace the rule	Name the actor	Correct or explain	Measure effects

SME Connect Better Regulation Forum

POLITICAL TWO-PAGE BRIEFING | DECISION CASE FOR MEMBERS OF THE EUROPEAN PARLIAMENT

Regulatory Chain Control (RCC): Better EU Laws That Work

A political case for connecting evidence, democratic scrutiny and real-world results without changing who holds the legal powers.

Core political proposition

EU capacity to act and rigorous Better Regulation reinforce one another. A rule succeeds only when its legitimate political purpose is preserved from first design to practical application.

The problem is the full regulatory chain

Political objectives can be changed in practice by legislative amendments, delegated or implementing acts, standards, agency guidance, divergent national application and private supply-chain demands. SMEs experience their cumulative effect, not just the original EU legal text. A credible control therefore follows the final obligation rather than only the legal instrument that introduced it.

- **Evidence can arrive too late.** Procedures may formally be completed without changing an unworkable design.
- **A critical SME finding may have no consequence.** Too often the result is recorded without a clear response or redesign.
- **Simplification can shift the burden.** A removed statutory duty may reappear through guidance, customer questionnaires or digital compliance systems.

RCC in one operating rule

TRIGGER	EVIDENCE	RESPONSIBLE ACTOR	CONSEQUENCE	REVIEW
Material risk	Proportionate test	Named decision-maker	Reasoned response	Verified result

Two safeguards run across the chain: traceability from political objective to actual obligation, and a Burden-Migration Test to distinguish real relief from cost shifting.

Why the proposal is institutionally grounded

The Commission's 2026 Better Regulation agenda, Parliament's 2026 Better Law-Making resolution, the Ombudsman's findings on urgent lawmaking (including CAP 2024) and a September initiative from 13 Member States all address parts of this challenge. These are complementary developments, not endorsements of RCC. RCC adds a common method that links them. The Member-State initiative is not an agreed Council position; the Ombudsman's procedural findings concern preparation of urgent proposals, not their legal validity. These developments provide institutional context rather than backing for any specific RCC mechanism.

Not a call for deregulation

RCC preserves legitimate regulatory benefits, safeguards and the legislative compromise. It asks whether requirements are necessary, proportionate, feasible and demonstrably effective.

WHEN IS AN ADDITIONAL RCC CHECK JUSTIFIED?

First use existing impact assessments, consultations and implementation monitoring. An enhanced RCC test is warranted only if a material evidence or coordination gap remains, a competent actor can respond at an identifiable decision or review milestone, and the expected benefit justifies its own workload. Otherwise, record the baseline and close the check without extra procedure.

POLITICAL TWO-PAGE BRIEFING | INSTITUTIONAL DECISIONS

What would change for EU decision-makers?

Actor	RCC contribution within institutional competence
European Commission	Earlier necessity and coherence checks; stronger SME and implementation reality tests; named follow-up for material findings; more transparent burden accounts.
European Parliament and Council	Proportionate scrutiny of substantial amendments and high-impact secondary effects; visibility over procedural exceptions; protection of the legislative compromise.
Member States and national authorities	Earlier implementation feedback; clear distinction between EU duties, national choices, divergent enforcement and private over-compliance.
Regulatory Scrutiny Board (RSB)	Independent methodological quality scrutiny within its current mandate; any wider RCC role would need explicit authorisation.
Affected stakeholders	Representative SME and other user evidence, targeted reality checks and implementation feedback; no substitute for institutional decisions or stakeholder veto.

How a finding reaches a political decision. If a substantial amendment raises SME reporting costs, the responsible committee or Council team may ask for a brief note on evidence and alternatives. The negotiators may amend the text, request analysis or proceed. A voluntary record explains the response; it does not dictate the vote or delay the legislative process.

Two illustrative EU applications

- **AI Act – technical implementation.** A small provider could test the real high-risk compliance route, identify unavailable guidance or standards and assign corrective action within legal powers.
- **EUDR – burden transmission.** A concrete supply-chain test can trace repeated data requests to EU law, national practice or private contracting and identify the appropriate remedy.

Three realistic political contributions

- **Support a bounded Commission pilot.** The European Parliament can encourage a competent Commission service to test a few material dossiers; the Commission must itself approve the internal pilot, appoint its owner and set proportionate resources and selection criteria.
- **Seek a reasoned response.** Within the Commission pilot, material findings should be referred to the competent decision-maker for correction, further analysis or a documented decision to proceed. Parliament and Council could use such notes voluntarily; RCC creates no automatic veto or new response duty for them.
- **Report what changed.** Subject to the applicable rules on disclosure, explain the action taken and test actual SME time and costs, continued regulatory benefits, unresolved risks and additional workload. Verify savings rather than counting burdens transferred to private supply chains or administrative systems as relief.

Limits that protect institutional balance

RCC is not a new central regulator or a universal right to stop legislation. The RSB is not a political veto body; Parliament does not run Commission drafting or national enforcement. Binding new rights, statutory extensions or altered duties require their own legal basis. Political discretion remains with the responsible institutions; RCC makes the evidence and downstream consequences more visible to scrutiny.

The practical political choice

Start with a voluntary pilot using existing competences. Expand only if evidence shows that better decisions, implementation and burden transparency justify the additional effort.

WHO CAN RAISE A CONCERN - AND WHAT FOLLOWS?

A lead DG, competent parliamentary committee or Council Presidency may raise an issue through existing procedures; national authorities and users can provide documented signals. An RSB review-request role is a **future option requiring authorisation**. Only a qualified residual problem warrants further testing. A competent sponsor decides whether to use an RCC check, an existing assessment or no additional review. None creates a veto or delay.

RCC IN THE EU REGULATORY LIFECYCLE

Eight decision points. One connected control method.

RCC follows the existing EU process. It adds a **targeted evidence-to-decision link** only where ordinary checks leave a material gap.

FORMAL EU STAGE	POSSIBLE RCC CONTROL	TYPICAL WORK PRODUCT	COMPETENT DECISION-MAKER
1 **Commission preparation** Commission service / College	**1 Front-End Check** Necessity, legal fit, overlap	**Scoping Note** Options and evidence gaps	**Lead DG / Commission**
2 **Commission proposal** Commission and RSB remit	**2 SME & evidence check** Material feasibility risk	**SME and options note** Mitigation before proposal	**Commission / College**
3 **Parliament / Council scrutiny** Each institution decides	**3 Amendment Impact Check** Substantial change to scope	**Amendment options note** SME and cost implications	**EP committee / Council**
4 **Negotiation / compromise** Co-legislative negotiations	**4 Compromise Reality Check** Unassessed change or new duty	**Updated consequences note** Risks to legislative balance	**Negotiators / co-legislators**
5 **Adoption of the legal act** Formal vote and adoption	**5 Adoption & Review Check** Unresolved readiness risk	**Adoption checklist** Review or monitoring point	**Parliament and Council**
6 **Secondary rule-making** Delegated / implementing acts	**6 Material-Impact Screen** New formats, costs, or scope	**Secondary-measure note** Practical legal effects	**Commission; lawful scrutiny**
7 **National implementation** Application and enforcement	**7 Readiness & Burden Test** Systems or duties do not work	**Obligation Map / Readiness Note** Source and owner of remedy	**Commission / Member States**
8 **Evaluation and revision** Ex-post review	**8 Outcome Verification** Savings not realised; burden shifts	**Evaluation and options report** Actual benefits and costs	**Competent evaluator / legislator**

RCC ACTIVATION RULE

Reuse existing scrutiny → show a **material residual gap** → select one proportionate test → send an **Issue-and-Options Note** to the lawful decision-maker → review outcomes and RCC workload. **No gap or no usable decision route = no extra check.**

WORKING PAPER · POLITICAL AND TECHNICAL SUMMARY

Better Regulation as Regulatory Chain Control (RCC)

A concise summary of the October 2026 Working Paper by the members of the SME Connect Better Regulation Forum

Better EU lawmaking is not about regulating more or less by default. It is about making politically legitimate rules evidence-based, proportionate, workable and accountable from their first design to their real-world effects.

1 The political proposition

The EU needs the capacity to respond to common economic, technological and geopolitical challenges. But effectiveness cannot be measured by the number of laws adopted or simplified. A law only succeeds if its objectives survive the full regulatory process and can be delivered in practice by public authorities, citizens and businesses, including SMEs.

That process extends well beyond a Commission proposal: parliamentary and Council amendments, delegated and implementing acts, standards, agency guidance, national implementation, enforcement and private compliance practices may all change the actual obligations. Regulatory Chain Control (RCC) is the proposed governance method for retaining coherence across those stages, without creating a single new regulator.

Five recurring points of failure

- **Fragmented portfolios.** Rules developed in different Commission services can produce overlapping requirements, data requests and deadlines.
- **Late practical evidence.** Consultations may come after design choices are settled or be difficult for small organisations to use.
- **Weak SME consequences.** An SME test can identify unworkable obligations without triggering redesign.
- **Uncontrolled implementation effects.** Secondary measures, national additions and private requests may expand or relocate burdens.
- **Unverified simplification.** Declared savings may be forecasts, offset by new burdens or merely shifted to another actor.

One operating rule at every significant control point

TRIGGER	EVIDENCE	RESPONSIBILITY	CONSEQUENCE	REVIEW
What requires scrutiny?	What must be demonstrated?	Who must respond?	What happens if a test fails?	When is the result checked?

The two cross-cutting safeguards are traceability (from legal objective to affected obligation and outcome) and a Burden-Migration Test (to ensure costs are removed, not displaced). Controls are proportionate to the material risk. RCC is not deregulation by default: it must preserve legitimate safeguards and the benefits of regulation.

USABLE MODULES | STRONGER VALUE WHEN CONNECTED

A reality check, readiness test, obligation map or burden-migration analysis can work individually within an existing mandate.

1 SIGNAL
Material concern through a lawful channel

2 SCREEN
Use ordinary controls first; test residual gap and value

3 SELECT
Competent sponsor chooses a bounded test or closes

4 HAND OVER
Options reach decision-maker; verify outcome

A lead-DG / Secretariat-General stewardship model is a proposal, not a condition for using the RCC tools. Full integration must be tested for added value.

2 Better decisions before adoption

RCC starts before the political preference for a legal instrument becomes difficult to change. It is designed to make existing Better Regulation checks operational rather than add paperwork for its own sake.

Test whether new EU action is necessary

A Front-End Regulatory Restraint, Coherence and Subsidiarity Check should compare three routes: no new intervention; better implementation or enforcement of existing rules; and new EU action. If new action is justified, it should test EU added value, instrument choice, overlap with existing obligations and less burdensome effective alternatives. Major new reporting duties should first prompt a review of obligations already in the same field.

Use consultation to improve the actual design

Stakeholders should contribute at the problem-definition, option-design, high-impact secondary-rule and implementation-review stages. This includes micro-enterprises, self-employed people, SMEs, other affected groups and enforcement authorities. A short published response matrix would show which material concerns led to change, mitigation or a reasoned rejection. Participation provides evidence; it does not replace political decision-making.

Turn Think Small First into a real decision gate

The SME and Competitiveness Check should consider direct and indirect costs, digital feasibility, investment and innovation, and unequal effects across Member States. If a significant SME obstacle emerges, the competent decision-maker should receive workable redesign options—simpler reporting, thresholds, templates, phased application or once-only systems—and give a reasoned response. RCC would not determine the political choice. A separate Implementation Readiness Gate would test whether essential guidance and systems are usable before duties apply.

Discipline cumulative administrative costs

The paper proposes a targeted pilot of One-in, Two-out for verifiable recurring administrative costs, not a general cap on regulation or regulatory benefits. Each material new cost should be matched, where feasible, by twice the amount in verified recurring savings, with transparent debits where an immediate offset is unavailable. Reporting should show new costs, offsets and realised savings separately, with independent checks against double counting and burden shifting.

Preserve evidence through negotiations and bundled reforms

Substantial co-legislator amendments should receive proportionate assessment when they materially extend scope, costs or SME effects. Bundled legislative revisions should set out their overall net effects and identify individual changes needing closer analysis. Packaging several amendments together does not itself demonstrate simplification.

Keep urgency exceptional, but workable

Where normal safeguards are shortened for significant proposals, the Commission should explain the urgency, available evidence, stakeholder opportunities, authorised procedural exceptions and any assessment deferred. Under agreed arrangements, Parliament could receive this short Urgency and Evidence Note early and seek clarification without an automatic procedural delay. The European Ombudsman's 2025–26 findings support transparent handling of exceptions; proportionate ex-post review may compensate where important ex-ante checks could not be completed.

3 Control the rules that emerge after adoption

The central test is not merely whether a legal act was validly adopted. It is whether the rules and administrative systems through which it is applied preserve legislative intent, regulatory benefits, proportionality and SME feasibility.

Screen high-impact secondary measures

Delegated acts (Article 290 TFEU) and implementing acts (Article 291 TFEU) have distinct legal bases and scrutiny arrangements. Parliament and Council may exercise the objection or revocation rights provided for delegated acts; Member-State committees oversee many implementing acts, with different scrutiny rights for the co-legislators under Regulation (EU) No 182/2011. RCC would add only a proportionate material-impact note within those existing procedures, alongside checks of technical standards, agency guidance and SME feasibility. It cannot convert one scrutiny mechanism into another.

Make application dates realistic

Before a material duty starts to apply, an Implementation Readiness Gate should check that definitions, standards, guidance, digital interfaces, templates and responsible authorities are sufficiently complete and usable. If they are not, proportionate corrective measures, phasing or an adjusted date should be considered where legally possible. This is not a general suspension power.

Distinguish gold-plating from other sources of burden

Member States should publish Gold-Plating Prevention and Impact Notes where EU rules allow significant national choices. These should distinguish EU requirements from permitted national additions, explain the costs and benefits, and flag risks of Single Market fragmentation. Incorrect application of EU law, divergent enforcement, incompatible administrative systems and private over-compliance require different remedies; they should not all be labelled "gold-plating".

Stop burdens migrating to SMEs outside the formal scope

Simplification can fail when a duty removed or limited in legislation reappears in certification, customer questionnaires, platform requirements or supply-chain contracts. The proposed Burden-Migration Test follows the obligation to the actor who actually bears it. Exempting an SME on paper is insufficient if equivalent costs are foreseeably transferred to it in practice.

Measure what was removed—not merely what was promised

An obligation-level burden account should distinguish existing costs, gross new costs, obligations actually removed or made cheaper, future costs avoided, and forecast versus realised savings. It should identify the responsible service, legal act, type of duty, one-off and recurring cost, company size and the point where costs arise. Regulatory benefits belong alongside costs. Significant estimates should be checked independently under an appropriate mandate. The Regulatory Scrutiny Board (RSB) already reviews Commission impact assessments and selected evaluations; a broader RCC audit role cannot be assumed.

Use digital traceability and make review routine

A traceable regulatory-chain record could link major files to secondary measures, responsible services, implementation tools, expected and realised costs, and review points. It should build on existing public registers and authoritative data, with interoperable links wherever feasible, rather than require a new central database or duplicate reporting. Periodic sectoral reviews would check whether obligations remain necessary; review or sunset clauses should be considered where suitable for temporary, experimental, crisis or urgency-based rules.

AI-ASSISTED REGULATORY CHAIN INTELLIGENCE - OPTIONAL

Commission GPT@EC and the AI4DRPM prototype illustrate document-support capabilities, not autonomous RCC. Approved tools could compare legal versions, map obligations, flag conflicting dates or duplicate signals, or draft an Issue-and-Options Note. **AI cannot trigger a check or decide law.** Officials verify legal sources, dates, addressees, competence and practical evidence. A one-dossier, one-obligation trial compares manual and assisted work for omissions, false alerts, total staff time, costs, confidentiality and data/security compliance; stop without net benefit. SME costs, burden migration and regulatory benefits need field evidence. RCC must work without AI. [Main §§8.6, 12.5; Annex III, p. 65; sources A1–A7, p. 70]

INSTITUTIONAL ARCHITECTURE

4 Institutional responsibility and RCC system functions

RCC does not centralise authority. It proposes a way to keep evidence usable across a regulatory dossier while decisions remain with the competent institution. A standalone SME test or readiness check requires no EU-wide RCC steering system.

Four functions with different purposes

Stewardship	Keep the legal obligation, open questions, evidence, owner and review point visible as a dossier moves from proposal to implementation.
Steering	Where a material gap spans services or stages, connect the right actors, consolidate duplicate enquiries and return evidence to the competent decision-maker.
Selective activation	Screen a signal against existing assessment, the unresolved risk, a real decision window and expected net benefit; the authorised sponsor may also decline a new check.
Optional AI	Assist with source-linked version comparisons and draft obligation maps; officials validate law, data, costs and conclusions. No automatic legal decision.

Who can do what under existing competences?

Commission DG / SG	A competent DG owns Commission-side work; the Secretariat-General may facilitate cross-DG coherence when useful.
Parliament / Council	Use or request evidence under their respective procedures. RCC confers no new amendment veto, suspension or instruction right.
RSB	Independent quality control within its existing remit. A broader RCC task requires express authorisation.
Member States / users	Contribute implementation and real-task evidence through lawful channels; national powers and stakeholder roles remain distinct.

Why connected evidence can add value

A documented SME concern may originate in an EU obligation, national administrative practice or a buyer questionnaire. An obligation map locates the source; a single triage identifies whether existing procedures have already solved it; stewardship preserves the verified result for later implementation and evaluation. Steering is needed **only** if several competent actors must coordinate. The model should be discontinued or simplified if this coordination creates more work than it saves.

IMPLEMENTATION REMAINS MODULAR

Start with an individual control where it can help. A coordinated dossier pilot is an **option**, not a precondition or established EU mandate. Formal extension of institutional rights would require its own lawful route.

Main Working Paper: §§8.1–8.7 (pp. 24–30); §§12.2–12.3 (pp. 47–49); Annex II (p. 64).

IMPLEMENTATION

5 From RCC concept to a bounded pilot

The operational test is **not** whether a new institution can be designed. It is whether a limited, lawful RCC check improves a real decision compared with ordinary Better Regulation procedures, without disproportionate additional effort.

A four-decision sequence

1 Screen	Identify one material obligation or user task, existing evidence, the unresolved gap and an upcoming lawful decision or review point.
2 Authorise	A competent sponsor names the owner, the bounded test, evidence providers and a short deadline; reject duplicates and non-material signals.
3 Hand over	Deliver a source-verified Obligation Map and a short Issue-and-Options Note. The competent body decides to correct, seek more evidence or proceed.
4 Verify / exit	Compare with the ordinary baseline: decision value, policy protection, actual SME effort, shifted burdens and total staff and IT costs of RCC.

Five independent tools suitable for early pilots

Front-End Check: test necessity and overlap before instrument choice is fixed. **SME Reality Check:** user-test a representative obligation. **Material-Impact Screen:** target consequential secondary measures. **Implementation Readiness Gate:** check guidance, standards and interfaces before application. **Burden-Migration Test:** verify whether work disappeared or moved into national or private requirements.

What a coordinated pilot adds – a hypothetical example

Suppose a smaller supplier receives two questionnaires requesting substantially the same data. A competent service first checks the EU legal duty and existing guidance; a targeted user test distinguishes statutory, administrative and contractual fields. If multiple services must respond, voluntary steering can combine the evidence into one note. The responsible bodies then act within their mandates. The pilot measures repeated data requests, SME time, institutional hours and continued regulatory protection. The example is a **test design, not an observed RCC result.**

OPTIONAL AI: COMPARE WITH MANUAL WORK

For one approved task, compare a source-linked AI-assisted draft with the ordinary manual method. Measure omissions, false alerts, checking time, confidentiality, security, legal validity and total costs. Human legal review and a viable non-AI route are mandatory.

Political bottom line

Invite a small, voluntary Commission-side pilot under existing powers; Parliament, Council and national authorities may contribute through their lawful channels. **Scale only where verified net value exists.** No automatic trigger, veto, statutory deadline change or new reporting obligation follows from RCC.

Main Working Paper: §§12.2–12.7 (pp. 47–57); Annex III (p. 65); print source register (pp. 66–70).

SELECTED OFFICIAL ENTRY POINTS | CLICKABLE REFERENCES

NZ stewardship Dutch ATR EU RSB GPT@EC Cellar EDPS

RCC IN PRACTICE | MAKING THE CONTROL LOGIC WORK

Can RCC actually be used on an EU dossier?

Yes. Following a proportionate screen for a residual material gap, an authorised, **lead-DG-owned** Commission pilot could connect existing evidence to a lawful pending decision without adding a legislative stage or veto. The Secretariat-General may assist with cross-DG coordination where useful. A signal or AI alert cannot automatically launch a check; Parliament and Council may use findings voluntarily under their own procedures.

What a pilot team would do, from start to finish

STEP	PRACTICAL ACTION BY THE RESPONSIBLE SERVICE	WHAT IS PRODUCED
1 Select	Choose an ongoing file or secondary measure with material SME, market or implementation risk. Appoint one file lead; record the policy objective, legal basis and next decision point.	One-page scope and baseline
2 Reuse and test	Bring together the existing impact assessment, consultations, legal obligations, technical guidance and cost data. Only commission targeted SME user-testing where there is a genuine evidence gap.	Short evidence and risk record
3 Hand over	Send each material finding and workable options to the actor authorised to decide. Record the response: a correction, request for more evidence or reasoned decision to proceed. Legislative changes remain with the co-legislators.	Named action and decision log
4 Verify	Recheck at a defined milestone: before application where practicable, and after application for actual costs and policy effects. Test for burdens shifted to national or private channels.	Readiness or outcome check

Illustrative five-field control record - AI Act

Illustrative test scenario: a smaller AI provider reports that a compliance step cannot yet be completed reliably using the a vailable technical guidance. This is a proposed pilot test, not a finding against the AI Act.

TRIGGER	A material SME compliance task appears unworkable near the relevant application milestone.
EVIDENCE	Map the exact duty and available guidance; ask representative small providers to complete the task; document time, gaps and workable alternatives.
ACTOR	The Commission/AI Office and competent national authorities act within their respective mandates. Only the authorised legislator can change binding duties or legal dates.
CONSEQUENCE	Publish clearer guidance, templates or coordinated support where lawful; identify any unresolved gap and explain the decision. RCC does not automatically stop application.
REVIEW	Repeat the user test and compare actual compliance effort, legal certainty and regulatory protection after application.

Minimum extra bureaucracy: one lead, one shared control sheet, a decision record and one review point. A critical finding must lead to an identifiable response; routine or low-impact files should not receive the full process.

WHAT THE TWELVE CASES HELP TO TEST

Eight documented situations and four prospective tests - diagnostic examples, not proven RCC outcomes.

Readiness before application	IVDR, AI Act, DPP/ESPR, EUDR
Coherence and burden transmission	PPWR, CSRD, EUDR, CBAM
Procedural workability	EFSA/Novel Foods, Guarantee Label, Biotech Act, vitamin levels
Enforcement and verified outcomes	Late Payments, CBAM, IVDR

Overlaps are deliberate; every pilot needs its own materiality and baseline test.

RCC IN PRACTICE | LIVE LEGISLATIVE DECISION

How RCC could inform a committee amendment

European Biotech Act — a concrete, illustrative application within the ordinary legislative procedure.

REAL FILE · EXISTING LEGISLATIVE PROCESS

COM(2025) 1022 · 2025/0406(COD). The Commission proposes reducing authorisation time for multinational clinical trials from **106 to 75 days**. The European Parliament's joint **SANT/ITRE** committees have a draft report and tabled amendments. Their scrutiny and the Commission's analytical documents already exist; RCC must not duplicate them.

WHAT IS THE ADDITIONAL RCC VALUE?

Existing control

Commission assessment plus parliamentary scrutiny of the proposal, amendments and regulatory safeguards.

Additional RCC link — only if needed

A targeted test of the real multi-country sponsor workflow, translated into options **before** a committee choice.

A FIVE-STEP RCC INTERVENTION RECORD

1	**TRIGGER / MANDATE**	If a material SME or implementation question remains, SANT/ITRE could request a targeted check **through their own procedures**, before fixing a committee position.
2	**REUSE THE BASELINE**	Read COM(2025) 1022, the supporting Commission analysis and tabled amendments. State **precisely** what evidence is still missing.
3	**TEST THE REAL TASK**	Trace a multinational CTIS submission: reporting Member State, ethics review, information requests and sponsor hand-offs. Measure days, SME costs and safeguards.
4	**DELIVER THE OUTPUT**	Submit a dated **Amendment Issue-and-Options Note**: evidence, uncertainty and choices to keep the 75-day proposal, refine safeguards or propose a change.
5	**DECIDE / VERIFY**	The committees may amend, retain or seek analysis; Council follows its own procedure. Only the co-legislators change the law. After application, verify time, cost and protection.

WHAT IS FEASIBLE — AND WHO HOLDS THE POWER?

Now: a Commission DG may authorise an internal pilot within its own mandate; the EP committees may seek evidence through their own procedures. **By agreement:** services, national authorities and sponsors can share targeted facts. **Later:** any new binding duty or scrutiny right requires the appropriate legal basis. **No RCC veto, delay or extra legislative stage.**

2025/0406(COD), including the June 2026 draft report and July 2026 committee amendments; RCC Main Working Paper, §§12.2–12.3.

RCC IN PRACTICE | ILLUSTRATIVE EU APPLICATION | CASE 1

EU AI Act: making technical compliance workable

Regulation (EU) 2024/1689, as amended by (EU) 2026/1744 — high-risk AI implementation chain

What the EU record shows. The AI Act (Regulation (EU) 2024/1689), as amended by Regulation (EU) 2026/1744, sets risk-based requirements with staged application. Chapter III high-risk requirements for Annex III systems, including relevant recruitment uses, apply from 2 December 2027; those for Annex I product-related systems apply from 2 August 2028. Practical compliance depends on classification guidance, technical documentation, standards or common specifications, conformity assessment and enforcement arrangements. The Commission's AI Office and national authorities have distinct roles, and the Act contains SME support provisions. Consider an illustrative small developer of recruitment-related AI: this is a test scenario, not a reported infringement.

How RCC would operate in this dossier

TRIGGER	A consequential technical rule, guidance or conformity requirement creates material SME costs, or key compliance tools remain unavailable near the relevant application date.
EVIDENCE	User-test the actual classification route, standards, templates, documentation, interfaces and assessment costs with representative smaller providers; identify overlaps with other product or sector law.
RESPONSIBLE ACTOR	The Commission/AI Office address EU-level support and guidance; competent national authorities handle their statutory functions. Only the authorised lawmaker may alter legal obligations or dates.
CONSEQUENCE	A positive Material-Impact Screen activates proportionate SME and implementation checks. Close gaps through clearer guidance, reusable templates, coordinated specifications or other lawful measures; do not create an automatic suspension right.
REVIEW	Measure preparation time, recurring compliance cost and differences between firm sizes while testing whether safety, fundamental-rights and market objectives are preserved.

The concrete RCC decision point

Before a material obligation applies, an Implementation Readiness Gate asks whether a typical small provider can complete a defensible compliance route. A critical gap must lead to a named corrective action or a reasoned explanation within the applicable legal powers.

What an RCC pilot would actually do: small AI provider

01 Walk through a realistic task. For a hypothetical small provider of high-risk recruitment-screening AI, the Commission/AI Office could invite relevant national authorities and providers to test an end-to-end compliance route: classification, technical file, conformity steps and required supporting tools.

02 Pinpoint the blockage. Participants record unavailable or confusing guidance, templates, standards and assessment steps, then measure preparation time, outside fees and any overlap with sectoral rules. A missing tool is distinguished from a missing legal obligation.

03 Assign the remedy. Each gap is referred to the actor with the relevant mandate for clarification, reusable templates, standards coordination or a reasoned response. An RCC pilot cannot independently postpone legal duties or application dates.

IMPLEMENTABILITY NOW: voluntary user testing and guidance within existing powers. COOPERATION: national authorities and standards bodies. NEW LEGAL BASIS: only for binding new powers or changed statutory duties.

EVIDENCE OF EFFECT whether a small provider can complete the route with less time and cost while safety and fundamental-rights safeguards remain effective.

PUBLISHABLE RCC OUTPUT Material-Impact Screen • SME-tested compliance route • Implementation Readiness Report

OFFICIAL SOURCES AI Act: EUR-Lex | Commission: high-risk AI guidance | AI Act: SME measures (Art. 62) | Updated application dates: Reg. (EU) 2026/1744

Method: illustrative RCC application to a real EU legal file, not a claim that RCC was used, that the file necessarily failed, or that its legislative outcome would have changed.

RCC IN PRACTICE | ILLUSTRATIVE EU APPLICATION | CASE 2

EUDR: test implementation before obligations bite

EU Deforestation Regulation (EU) 2023/1115 and its 2025–26 implementation measures

What the EU record shows. Regulation (EU) 2023/1115, as amended by Regulation (EU) 2025/2650, requires due diligence for specified commodities and products. Principal duties apply from 30 December 2026. Eligible micro- and small operators established by 31 December 2024 have until 30 June 2027, subject to the timber exception. The 2026 implementation work also addressed product scope and the Information System. A cocoa importer and smaller downstream traders occupy different legal roles; statutory EU duties, national administration and voluntary customer information requests must not be conflated.

How RCC would operate in this dossier

TRIGGER	Changes to product scope or digital filing rules, or an approaching application date, create a material risk that real compliance systems and data exchanges are not ready.
EVIDENCE	Map the precise legal obligation by operator role; test declarations and APIs with representative businesses; check multilingual guidance, national authority interfaces and repeated private requests for the same data.
RESPONSIBLE ACTOR	The Commission is responsible for EU implementation measures and the information infrastructure; national competent authorities for their enforcement tasks; Parliament and Council for legislative amendments and applicable scrutiny rights.
CONSEQUENCE	Use an Implementation Readiness Gate plus a Burden-Migration Test. Fix usable interfaces, clarify data requirements and coordinate guidance within the legal mandate; legislative changes require the competent lawmaker.
REVIEW	Audit filing time, system usability, duplicate requests, divergence between Member States and realised SME burden while checking whether deforestation-related safeguards remain effective.

The concrete RCC decision point

If a smaller trader is repeatedly asked for a full upstream data package beyond its legal role, RCC traces the request to its source: EU law, national practice or private contracting. The appropriate response follows that source rather than weakening the legitimate policy objective.

What an RCC pilot would actually do: cocoa supply-chain requests

01 Follow the obligation. A pilot selects an importer, a smaller downstream trader and a business customer, then maps what each must collect, submit or pass on under the EUDR. The map separates EU legal duties from national procedures and customer requests.

02 Test the actual workflow. Affected firms and the competent authorities check sample digital submissions, duplicate information requests and whether data can be reused, including across customers or administrative interfaces.

03 Correct at the right level. EU services can clarify EU guidance or technical interfaces within mandate; national authorities address their practices; business customers can be invited to narrow voluntary questionnaires. A binding change to law or private obligations needs its proper legal route.

IMPLEMENTABILITY NOW: obligation mapping, usability testing and guidance. COOPERATION: national authorities and supply-chain firms. NEW LEGAL BASIS: only for binding changes beyond existing mandates.

EVIDENCE OF EFFECT duplicate requests, failed filings and SME staff time, alongside continued deforestation safeguards.

PUBLISHABLE RCC OUTPUT Role-by-role Obligation Map • System Readiness Dashboard • Burden-Migration Findings

OFFICIAL SOURCES Commission: EUDR implementation update | Commission: simplification review (COM/2026/191) | Commission: roles and responsibilities

Method: illustrative RCC application to a real EU legal file, not a claim that RCC was used, that the file necessarily failed, or that its legislative outcome would have changed.

ORDINARY BASELINE VS RCC ADDED LINK

EUDR guidance and system support remain the ordinary starting point. Only a material residual role-by-role gap justifies a targeted RCC mapping and an Issue-and-Options Note for DG ENV or the competent national authority.

SME CONNECT BETTER REGULATION FORUM | POLICY SUMMARY - VISUAL ANNEX

Graphic 1

Regulatory Chain Control (RCC) across the EU policy cycle

RCC links Better Regulation to the entire life cycle of a rule - from the first design choice to measurable effects on the ground.



Five recurring control questions at each significant point

TRIGGER	EVIDENCE	RESPONSIBILITY	CONSEQUENCE	REVIEW
What requires scrutiny?	What must be demonstrated?	Who must respond?	What happens if a test fails?	When is the result checked?

Two cross-cutting safeguards

Traceability

- Link the legal objective to the concrete obligation.
- Show which actor changed the burden and why.
- Allow later review of whether the measure worked.

Burden-migration test

- Check whether costs are removed or simply shifted.
- Look across secondary law, national transfer and private requests.
- Count institutional workload as well as business costs.

What RCC does - and does not do

RCC does not automatically mean more regulation or less regulation. It is a governance discipline for making rules politically legitimate, technically workable and accountable throughout the chain.

It can be piloted with existing institutional competences. The objective is not to create a single new regulator, but to organise evidence, responsibility, review and corrective action much more coherently.

RCC builds on established institutional and national practice

European Commission	COM(2026) 380: simplicity by design, stronger RSB scrutiny and secondary-act deep cleaning.
European Parliament	Resolution P10_TA(2026)0063: full-cycle Better Law-Making, stronger evidence and parliamentary scrutiny.
European Ombudsman	2025-26 urgent-proposal findings and 28 Sept. JURI remarks: reasons for urgency, evidence and consultation.
National precedents	Germany: costs/NKR; Netherlands: ATR; Denmark: follow-or-explain; Austria: ex-post review; Sweden: specialised councils.

Existing building blocks, not RCC endorsements. RCC adds traceability, clear responsibility and verified outcomes.

Source: distilled from the SME Connect Better Regulation Forum Working Paper, October 2026.

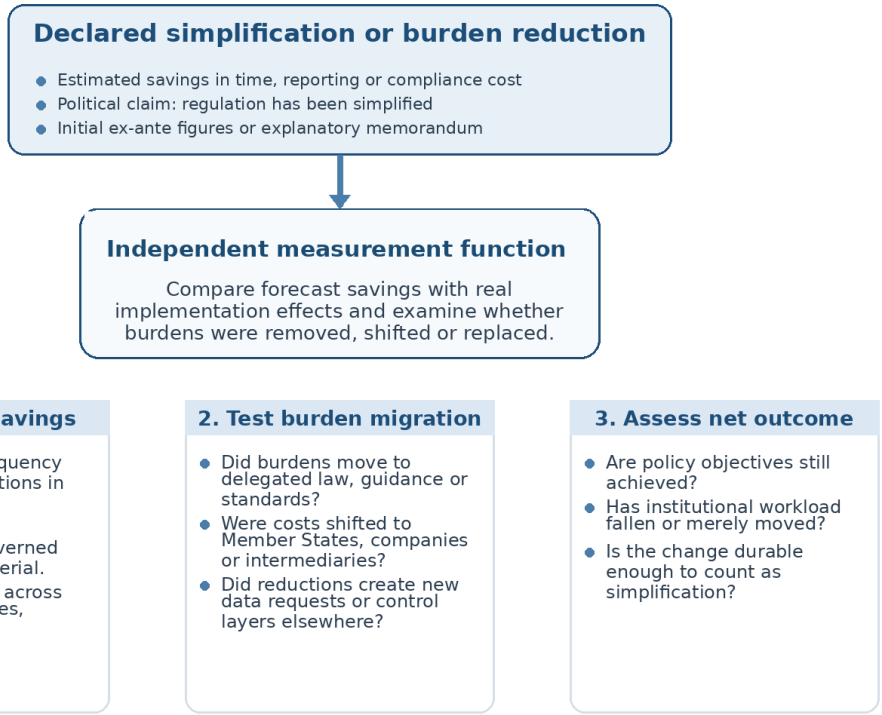
HOW TO READ THIS SIMPLIFIED VISUAL

Five policy-cycle segments summarise the eight possible institutional RCC checkpoints in the Main Working Paper. Seven operating steps guide a selected test; five record fields capture its trigger, evidence, owner, response and review. Controls are selective, not automatic.

Graphic 2

Independent, outcome-aware measurement of regulatory burden

A simplification claim is credible only if reductions in administrative cost are verified independently and shown not to have migrated to another stage, actor or obligation.



Possible conclusions

Confirmed reduction	Partial or shifted gain	No credible simplification
Savings are real, policy objectives remain intact, and no material burden migration is detected.	Some savings exist, but material costs reappear in another actor, level or instrument.	Claimed reductions are not evidenced, are offset by new burdens, or degrade implementation quality.

Practical implication for RCC pilots

Early pilots should include a simple burden register or dashboard connecting obligations, responsible actors, implementation stages and measured outcomes. This allows institutions to distinguish genuine simplification from redistribution of compliance effort.

Source: distilled from the SME Connect Better Regulation Forum Working Paper, October 2026.

EVALUATION RULE FOR RCC PILOTS - INCLUDING OPTIONAL AI

Compare each added RCC check with the ordinary Better Regulation baseline: decision value, retained policy benefits, actual SME costs, shifted burdens, uncertainty and the workload of institutions and stakeholders. For optional AI, compare approved tools with manual analysis; measure source accuracy, omissions, false alerts, human checking time, total cost and legal/data safeguards. **Stop or redesign** either component if incremental value is not demonstrated. See Main Annex III p. 65 .

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