Regulatory Chain Control (RCC)

Making Better Regulation work from EU lawmaking to real-world obligations

THE CHALLENGE

The EU already uses impact assessments, consultations, SME tests and evaluations. Yet duties may change through legislative amendments, secondary rules, national application and private supply-chain requests. Evidence can get lost between stages, while the real cumulative cost to SMEs diverges from the original design.

WHAT RCC ADDS - AND WHEN

RCC is a **modular, risk-based dossier control method**, not a new regulator or mandatory gate. It links a material regulatory problem to the institution able to address it, makes response options transparent and allows the result to be checked against real-world outcomes. It traces obligations from legal source to business task. An additional check is justified only if routine procedures leave a **material unresolved gap**, a lawful decision route exists and likely gains outweigh RCC's own workload.

ONE COMMON CONTROL RECORD

TRIGGER	EVIDENCE	OWNER	RESPONSE	VERIFY
Material unresolved risk	Existing sources + targeted reality check	Named competent actor	Issue-and-Options Note	Benefits, costs + RCC effort

A dated **Issue-and-Options Note** records the finding, alternative responses and the responsible decision-maker; an **Obligation Map** or handover record is added only where useful.

FUNCTIONS THAT MAY BE COMBINED - BUT NEED NOT BE

STEWARDSHIP

Keep the legal source, affected task, unresolved question, responsible actor and review point traceable across stages.

STEERING

Connect competent actors only where evidence spans services or stages; coordinate handovers, not political choices.

SELECTIVE ACTIVATION

Authorise extra work only for a material gap, a usable lawful decision window and expected net benefit. A valid outcome is **no new test**.

OPTIONAL AI

Help compare official text versions and draft source-linked obligation maps. Humans validate law, figures and conclusions.

WHERE EXISTING EU DECISIONS REMAIN IN CHARGE

Commission	A lead DG may scope a test under its remit; the Commission decides on its proposal.
Parliament / Council	Competent bodies may use amendment evidence voluntarily; co-legislators retain every decision.
Technical / national stage	EU services and national authorities review readiness or burdens within their own powers.
Review / revision	Competent reviewers verify benefits, costs and burden migration; any legal change follows the proper route.

THE PRACTICAL ADDED VALUE

Better decisions: competent institutions receive usable evidence while they can still act. **Clear accountability:** the origin of duties, responsible response and follow-up remain traceable. **Real simplification:** detect costs shifted downstream rather than removed. **Verified results:** compare SME workability, policy safeguards, compliance costs and RCC's own workload.

Decision rule: No material residual gap, no lawful decision route or no credible net gain means **no additional RCC test**.

RCC in practice: two decision routes

Real EU dossiers are used below to illustrate **proposed tests**, not completed, authorised or proven RCC interventions.

BEFORE ADOPTION | EUROPEAN BIOTECH ACT

COM(2025)1022 / 2025/0406(COD) / Joint EP SANT-ITRE scrutiny

Decision point. The Commission proposes reducing the **statutory timeline** for multinational clinical-trial authorisation from **106 to 75 days**, including validation and ethical review. Parliament's SANT/ITRE committees could seek evidence on its workability before adopting a position.

RCC test. Reuse the proposal analysis and amendments. Follow a realistic SME multi-country CTIS application through validation, ethical review, authority handovers and requests for information; record elapsed time, staff effort and safeguards.

Usable output. A source-linked Amendment Issue-and-Options Note would show **whether the 75-day target is workable**, where handovers may fail and which safeguards or amendments merit consideration. Parliament and Council retain the legislative decision.

AFTER ADOPTION | EU DEFORESTATION REGULATION

Regulation (EU) 2023/1115, as amended by (EU) 2025/2650 / Illustrative cocoa chain

Decision point. Ahead of EUDR application and system milestones, test a cocoa importer and a smaller downstream trader. The main start is **30 Dec 2026**, with a **30 Jun 2027** deferral for qualifying micro/small enterprises (subject to exceptions).

RCC test. Separate importer due diligence from downstream record-keeping duties (including initial reference-number collection), national procedures and repeated private customer requests. Test where data can be reused without weakening **traceability or the EUDR's deforestation objectives**.

Usable output. A role-specific Obligation Map and Issue-and-Options Note would identify duplicate requests and feasible remedies while protecting traceability, enforcement and environmental aims. Competent authorities may improve lawful guidance; legislative change requires the prescribed EU procedure.

START SMALL. VERIFY BEFORE SCALING.

A competent service should authorise a **bounded pilot** with a named owner, an unresolved risk, an ordinary-control baseline and a usable decision or review point. Reuse the existing evidence, record the institution's response, and check whether the intervention improved **SME workability and regulatory outcomes** at proportionate cost. Count burdens transferred elsewhere and RCC's own workload. Expand or formalise coordination only if the net benefit is demonstrated.

Evidence, not endorsement. OECD lifecycle work and national examples offer transferable functions, not an existing EU-wide RCC. The companion Practical Cases Handbook examines **12 dossiers** (eight documented, four prospective), identifying potential control points rather than completed RCC outcomes.

SUPPORTING MEMBERS OF THE BETTER REGULATION FORUM

IVSH Association of the German cutlery and housewares industry

seldia The European Direct Selling Association

food supplements europe

TAE Taxpayers Association of Europe

ZPP Związek Przedsiębiorców i Pracodawców

EWS Europäischer Wirtschaftssenat e.V. Wirtschaftskompetenz für Europa

eea European Enterprise Alliance

Institutional role. Responsibility for this briefing rests with Forum members. SME Connect is a politically neutral network, moderator and convening platform; it does not adopt collective legislative positions, intervene in negotiations or advocate on behalf of members. Members remain independent. **EU Transparency Register:** 465361845122-87.

AI assistance. MILA X Intelligence, based on ChatGPT, supported preparation and editing. Human responsibility for the content remains with Forum members.

Official case sources: European Biotech Act proposal · EP procedure · EUDR amendment · 2026 EUDR guidance.