

INTRODUCTORY TRAINING PROGRAMME ON REGULATORY IMPACT ASSESSMENT FOR TELECOM REGULATORY AUTHORITY OF INDIA (TRAI)

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DETAILED EVENT REPORT



SUBMITTED BY

CUTS INTERNATIONAL

&

CUTS INSTITUTE FOR REGULATION & COMPETITION

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OPENING SESSION

Mr. Pradeep S. Mehta, Secretary General, CUTS International, acknowledged the importance of the Telecom Regulatory Authority of India (TRAI) regulating the Indian telecommunications market, which is the second largest in the world and has a great bearing on the socio-economic development of the nation. He pointed out that the absence of adoption of Regulatory Impact Assessment (RIA) while formulating regulations leads to formulation of sub-optimal regulations with unintended consequences on the market. Citing TRAI's practice of putting draft regulations in public domain for consultation, he appreciated the regulator's efforts towards bringing in more transparency and involving public in the regulation formulating process and further encouraged it to adopt RIA. Towards the end, he emphasized on institutionalisation of RIA framework in policy making in India. In this regard, he mentioned that in the past, CUTS has contributed to the erstwhile Planning Commission's Working Group on Business Regulatory Reforms with a recommendation on impact assessment of existing and proposed regulations, worked on a project undertaking RIA in electricity generation sector and is working on an ongoing project to undertake RIA in the financial sector covering banking and insurance sectors. In his suggestions to TRAI, he recommended establishment of a separate cell within TRAI to be responsible for ensuring implementation of RIA before any new regulations are introduced and finalised.

Mr. Ram Sevak Sharma, Chairman, TRAI, spoke about the usefulness of the training session on RIA by providing a constructive platform for the TRAI officials to deliberate on issues faced while formulating regulations and in helping build their capacities. He stressed on the importance of the process of formulating regulations, which combines elements of legislative, judiciary and executive



functions and for TRAI to know the costs and benefits of regulations on society, at large. For this, he admitted to the need of undertaking a rigorous impact analysis of the proposed regulations to quantitatively compute the spill over effects of TRAI's regulation. He also acknowledged that though public consultation on draft regulation indicates at the impact of the regulation, yet it is not a definite method and comes with its inbuilt flaws of under representation. Thus, he believes that adoption of RIA can truly transform the regulation making process in India and also at TRAI.

Mr. Anil Kaushal, Member, TRAI, in his brief intervention admitted that in India, certain regulators take recommendations from experts before making a regulation but no analysis or suggestion is undertaken once the first draft is prepared. He thus reiterated the need for a strong analysis framework like RIA to be adopted by regulators.

Sudhir Gupta, Secretary, TRAI, talked about the informal ways adopted by TRAI to evaluate the regulations including public consultation. Since regulations have a huge

impact on investments, he reiterated the need for balancing benefits to consumers and service providers. He believed that a formal and structured method like RIA will help regulators to achieve this balance and will make the process of formulating regulations more robust.

SESSION I: INTRODUCTION TO RIA



In the first session, **Scott Jacobs, Managing Director, Jacobs, Cordova & Associates, US** delivered a presentation on the introduction to RIA, overview of its goals and results. Scott opened the presentation by acknowledging that India has an advantage in implementing RIA as it can learn from the experience and mistakes of many developed nations including the UK, the USA, Austria and others, who have already adopted it. Making a case for the need for an ex-ante RIA, he accepted that formulation of any regulation involves taking risk as sufficient data is never available. In such cases, RIA helps regulators interpret forthcoming changes to be brought about by enactment of the regulation with greater precision and reduces the risk.

For instance, before TRAI acts, it needs to know the consequences of its actions on the market else it may be caught unprepared for unintended failures that may occur as a result of those actions. He explained that RIA as a tool examines and assesses the impact of new policies, regulations and statutes. The tool aims to achieve net public benefit by analysing the costs, benefits, and risks of regulations using tools like cost-benefit analysis (CBA), multi criteria analysis, time value of money, etc.

Commenting on the role of the regulator, he explained that the market is much bigger than a regulator and therefore the function of the latter should be to manage (slow/accelerate/direct) the change driven by the former rather than directly controlling the market. Regulations, which have a high cost of compliance, end up harming the consumers as the cost of compliance by service provider is ultimately passed on to the consumers in terms of higher service prices. Cost effective and efficient regulations would also reduce the risk premium associated with investing in India and hence, increase attractiveness of the nation as an investment destination.

He also emphasised on the need to have universal standards of quality for formulating regulations with parameters including clarity of laws and predictability among others. He also recommended a four-stage way to undertake regulatory reforms:

1. Take regulatory stock by evaluating relevance of existing regulations with change in technology in the market
2. Check the regulatory flow by filtering all new regulations through a standard quality check
3. Check maintenance of supporting institutions
4. Delegate a responsible body with the responsibility of checking the quality of the regulation.

Explaining the concept of RIA in further details, he said that RIA is an evidence-based process of asking the right questions in a structured format, undertakes a systematic and consistent examination of the potential impact of government's action and finally communicates it to the decision maker and other stakeholders. Towards the end of the session, officials from TRAI raised the question about unavailability of data to undertake robust empirical analysis. To this, Scott suggested collecting information from other stakeholders in order to rationally predict the unavailable data. Responding to the question on involvement of subjectivity in matters related to public consultation and stakeholder interaction, he emphasised that in such cases a final decision is to be made by the official and not the RIA analyst as the former knows more about the market than the latter and thus can better interpret the subjective results.

SESSION II: USING RIA TO REDUCE REGULATORY FAILURES

While Mr. Jacobs explained the RIA through 'OECD database' (reference to the slide) and the graphical representation, the TRAI officials questioned that how two countries say Netherlands and France are related and yet differentiated and correspondingly, Greece positions higher at the graph. To this, Scott answered that the difference might be due to failure of regulation, to which Mr. Anil Kaushal (TRAI) added it might also be a failure towards compliance.



While providing the example of 'cleaning the swimming pool', Scott emphasised on the attribution of responsibility in the RIA process. TRAI officials felt that they are practicing RIA through consultations and focused - targeted questions. Scott further suggested that by practicing RIA, beyond the consultation process followed by TRAI will add following dimensions:

- another level of empirical evidences would be added to the process;
- infusion of transparency and trust will be built;
- will foster clarity and accountability; and;
- process will be more objective and systematic.

Chairman TRAI, Mr. R.S. Sharma raised a major concern (equally for all departments) of lack of availability of data. Giving the example of the debate on “Net Neutrality”, he added that in the absence of data, one does not have anything substantial to base their opinion on. Officials were inquisitive about the RIA process being methodical for the new/proposed regulations or to also expedite the existing ones. To this, Mr. Jacobs suggested the concept of ‘ex-ante’ and ‘ex-post’ RIA, which could not be dealt with in much detail due to constrained time.

While discussing the 09 step RIA process, most officials agreed that major resources should be diverted towards ‘defining and setting up of goals’ for public policy within the RIA process, which should be most time taking because of its crucial nature. While Col. Pandey was of the view that data collection is a crucial and most resource extensive process, Mr. Sunil Kumar Gupta shared that the data may itself be a cause of many problems, in case it is not specific and non-coherent. It emerged from the audiences that understanding gaps in data over time is crucial. Thus, the 6th step in the RIA process becomes important. To this, Scott replied that RIA also has a rational way of solving this problem through approximation of missing data.

While Scott discussed the real examples of correctness of RIA in the past, he mentioned the case of children being poisoned by eating pills from bottles in their homes in the US and the regulation on the bottle cap design that followed. The TRAI officials were interactive and intrigued to the speaker’s questions. It initiated an interactive discussion. They pointed out the decisive nature of ‘problem definition’, and it came out from the discussion that the key is to bring together a multi-disciplinary group to brainstorm about the problem.

SESSION III: WHY DO WE CARE ABOUT REGULATORY IMPACTS? LOOKING INSIDE THE RIA METHODS

The third session focussed on putting RIA into practice. The key aspects included the process of conducting RIA and the analytical tools available. He stated that often there are multiple options to choose from and it is beneficial to carefully consider all alternatives as our first instinct may not always provide the best answer. It is helpful to consider as many alternatives as possible. In this regard, he provided an example, wherein the government had decided to ban plastic bags without conducting a RIA. Post evaluation, approximately eighteen options emerged of which banning was not considered as a suitable option. Thus, the process of RIA helps to make the invisible, visible and access consequences not analysed earlier.

He mentioned that the costs are all the negative impacts of the regulation, while the benefits are all the positive impacts. The costs and benefits can be stated in monetary, metric or qualitative terms and can be subdivided into Economic, Environmental and Social. In addition, he mentioned that while quantification of costs and benefits is important, qualitative assessment also has a role to play in RIA.

Scott Jacobs highlighted the methods of undertaking RIA. He further mentioned that costs and benefits can be measured using the following tools –

- *Cost-Benefit Analysis (CBA)*: This is a purely mathematical model and both figures need to be in the same metrics. It compares overall negative and positive impacts and asks ‘if’ an action should be taken (do the benefits exceed the costs). However, the most common issue with this method is the difficulty to establish monetary values to some non-marketed impacts. Also, the relevant data may not be available or be expensive to collect and it may not be possible to present some impacts in terms where people are able to make reliable trade-offs against money. Further, CBA does not always need monetisation, as Scott Jacobs illustrated with an example of cost per statistical life saved and beyond a certain cost the options were rejected as the resulting benefits were not considered significant with respect to their costs. These resources could be better spent on other issues.
- *Cost-Effectiveness Analysis (CEA)*: This tool does not address the ‘if’ question but asks ‘what kind’ of action maximises the results for any given expenditure. It compares alternative ways to produce similar outputs, thus, is useful to compare programmes with similar goals. It is tough to implement the programmes with multiple categories of benefits as the cost effectiveness calculation is based on the quantity of a single benefit category. The benefits need to be reduced to a single number.
- *Multi-criteria Analysis (MCA)*: This tool addresses ‘what kind’ of action would produce the largest expected utility combining several consequences. This can also develop quantified, non-monetised metrics through a technique of weighting and scoring. It involves assigning weights to criteria and scoring options in terms of their performance against those weighted criteria. These weighted scores are then summed which can be used to rank options. However, he cautioned by saying that these weightings are subjective and it is important to obtain inputs from a variety of professionals (as a single person can bias the results), have the implementation methodology monitored and reviewed. The weighting methodology should also be published to maintain transparency.
- *Standard Cost Model (SCM)*: This is one of the most important tools of RIA as it calculates ‘how much’ the red tape requirement costs businesses in the country each year. However, some of the shortcomings of this tool are that the benefits are not considered, costs to citizens or government is also missing and only costs of information obligations are accounted for. It also does not consider other costs created by reducing administrative burdens and assumes 100 percent compliance.

He, however, mentioned that none of the methods can provide answers to all the governments’ questions such as the distributional issues to specific groups, uncertain future effects (such as technical changes etc.) and political concerns. Towards the end, he presented few cases using different types of data and presentation formats. Causal Mapping, a tool which can be used effectively to understand cause and effects can help make informed decisions. Options are also compared and presented using smiley faces or positive and negative signs to signify the extent and impact of the option. These can help policy makers easily identify the more suitable options. A pure numerical representation

can also help calculate the total net value and arrive at the most optimal solutions. Thus, the method of communication should be such that it is clear, concise and easy to understand as decision makers often do not have the time or the technical knowledge to go through the complete document.

Towards the end of the presentation, TRAI officials inquired about the suitability of the above mentioned methods for implementing RIA before taking an action on increasing call drops and hence reducing quality of service to consumers in India. In response, Scott suggested first adopting the CBA and asking questions on the willingness to pay by consumers to receive better service quality i.e. less call drops. He also suggested calculating the costs to service providers related to investments in upgrading the network and to pay penalty to the consumers in case of failure to abide by the regulation limiting the number of call drops. He also reiterated the fact that all extra cost incurred by the service provider is ultimately passed on to the consumers and hence, before passing the regulation, the regulator has to keep this fact in mind while calculating consumer welfare as a result of the regulation.

SESSION IV: ADMINISTRATIVE BURDENS AND THE USE OF THE STANDARD COST MODEL: CONCEPTS AND INTERACTIVE CASE STUDY ON TELECOM SECTOR (GROUP EXERCISES)

The group discussion session did not take place due to paucity of time

SESSION V: ASSESSING ALTERNATIVES TO TRADITIONAL REGULATION

This session dealt with developing and assessing alternatives to traditional regulation and Mr Jacobs emphasised that such alternative options should be considered in RIA. Examples of regulatory alternatives developed in different jurisdictions, including which alternatives can work in what situations were also highlighted.

Scott began the session with the interesting fact that RIA could have been an efficient solution to guide the 'odd-even' traffic scheme in Delhi. The discussion that followed was about establishing matrices in the RIA process. To this, someone asked that how health impacts can be monetised while establishing matrices, for instance to put ill effects of pollution into value. Officials were also interested in knowing if there is a mechanism to award weights to different parameters in RIA matrices. To this the speaker explained about the classical RIA, where every human life is treated equally. Thus, the need to give weights is done away with.

Ministries in government have a control mentality and they believe that control is inherently good. However, it must be understood that control mentality reduces regulatory options and is not good as a starting point of regulation. Citing an example of ferry regulation in Greece, Mr. Jacobs pointed out how government control stifled innovation and improvement in quality, and resulted in loss of public good. There are

various alternatives, other than control, to achieve the objectives of the law. Such alternatives include information campaigns, performance based regulation, voluntary commitments, process regulation, contractual arrangements, co-regulation, deregulation, self-regulation, insurance schemes, taxes and subsidies and tradable permits, which can influence the behaviour and incentivise performance. Increasing prices has direct effect on the market and human behaviour. Regulations act as incentive instruments so effective design of regulation is crucial. Various types of incentive instruments were discussed in the session. Providing example from the EU voluntary standards for airline passenger service commitment, the importance of defining good problem definition was emphasised by Mr. Jacobs. Further it was shown how sometimes sharing of information leads to more competition and benefit for consumers by adopting voluntary standards for passenger service commitment. Though it was also added that in case of safety concerns, government will have more justifications for not allowing voluntary safety standards.

There are limitations in governing high technology markets with high innovation index and thus regulation of such markets can be counterproductive at times. Example of EURO-NCAP (New car assessment programme) a rating system for car safety was also discussed in detail. Different points of view, for and against minimum safety standards for cars were discussed. The importance of performance based regulation as one of the important alternatives in regulatory design was also emphasised. EU requires that every RIA to have a performance based alternative. The aim in performance based regulation is not telling what to do but to tell what to achieve. This approach does not stifle innovation and encourages quality improvement. It was highlighted that standardisation of regulation focuses on inputs while the performance based approach focuses on outputs. However, it is harder to enforce the performance based rules compared to standardised rules. Mr. Jacobs mentioned that sometimes consumer might not be in a position to take informed decision, because of technical nature of the sector, where it is not possible for consumer to make a choice without relying on the expert advice. Example of medical device regulation in Japan was given where two years" were taken to approve a new medical device for the market. However, market innovation was stifled as a result. Thus freezing technology implies freezing the business and thus decreasing their innovation index and competitiveness.

A number of options came up during the discussions like quality issue, trials, setting minimum standards, safety, innovation, approval time by regulators. Importance of economic incentives and market trading schemes were also discussed. Example of global carbon emission and trading mechanism was discussed as to how it can help in allocation and usage of best resources. Debate also surrounded on whether to use such alternatives when traditional regulation has been used. The importance of involving all alternative options was discussed and how RIA takes into account this was highlighted. Example of proposed ban on fancy helmets was given which showed that standardising the helmet would have retrograde step as far as compliance is concerned. Regulatory rigidity can be self-defeating, at times. Citing comparative example of nursing home industry from USA and Australia, detailed analysis was undertaken as how result oriented general standard was better than process oriented result standards. USA had 500 federal nursing home standards which increased compliance costs also and were self-defeating in nature.

While discussing about ‘Assessing alternatives’ to the RIA process, the speaker gave the example of European commission not regulating the markets themselves, rather asking the airlines to self-regulate by putting passenger service commitments on Airlines’ website. Chairman Mr. Sharma applauded this example of self-regulation.

SESSION VI: CONSULTATION FOR RIA

Stakeholder consultation is an important tool for quality control and data collection. This session discussed the means of consulting and communicating with stakeholders as part of carrying out the RIA, and means of avoiding the pitfalls of poor consultation.

Scott stated that stakeholder consultation, which is an important tool for data gathering, builds in transparency in the regulation making process. Elaborating on the need for the process to be transparent, he talked about transparency being the most important parameter in order to reduce regulatory costs and risks and thus helps in increasing investments. In order to truly benefit from the process of public consultations, he suggested regulators to use Information Technology (IT)-based consultation methods like central web portals and cited examples of Singapore, Hong Kong and Australia as good global cases to learn from. While he appreciated that TRAI already has a well-established public consultation in place, he also informed TRAI about the international standard practice of providing at least 30-45 days for public to respond. In order to improve the consultation process, he recommended a step by step approach comprising planning of consultation, identifying the stakeholders, preparing a formal consultation document, consultation, analysing responses and incorporate suggestions, finally followed by providing feedback.

CLOSING SESSION

To Mr. Jacob’s question to the TRAI officers that how significant is RIA in their own institutional process, Dr. V. Gupta (Member) explained the process of ex-ante and ex-post consultation process at TRAI. She was interested to know that how much of RIA could be applicable in ex- post regulation- especially where corrective mechanisms are resorted to. Mr. Jacobs here underlined the importance of defining the correct baseline for the process. Mr. Sethi congratulated CUTS, CIRC and Mr. Jacobs for structuring the sessions well. Officers also acknowledged the need for having focused group discussions and active consultations embedded into TRAI consultation process. Scott Jacobs thanked the participants for their active involvement in the training workshop. He added that they could become ambassadors for RIA to reduce the mystery around the concept. He mentioned that over time there will be a cadre of very talented people that would be able to change the acceptability towards RIA. He concluded by saying that India had the capacity to undertake RIA and only the decision to move forward was needed to be taken. The participants expressed their appreciation and mentioned that the training programme had been enriching and opened them up to an entire body of literature. They also said that they would take the lessons learnt back to their institutions and attempt to apply them to

their areas of work. Further, they added that this had been an important opportunity to learn from the practitioner and the cases discussed throughout the course.

Chairman Mr. Sharma seemed forthcoming to the idea of incorporating RIA in the proceedings of TRAI and welcomed the idea of active participation of all the stakeholders, most important being the consumers

Ashwini Swain, Director, CIRC thanked Scott and added that it had been a great learning experience for all the participants including the CUTS/CIRC team. He also appreciated the work done by the CUTS and CIRC team in putting this event together. He concluded by saying that CUTS and Jacobs, Cordova and Associates would be partnering to deepen their engagement within India and also happy to engage with TRAI in this endeavour.

ANNEXURE I: PARTICIPANT FEEDBACK REPORT

Overall Programme Evaluation

Post the completion of the training programme, feedback was sought from the participants on its various aspects. Overall, around 52 percent of the participants found the training programme to be 'excellent' with 11 out of 21 selecting this option, while all the rest selected the 'very good' option. Close to 60 percent of the respondents felt that the quality of the speaker as well as the organisation conducting the training programme was excellent, while the rest found it to be 'very good'. In terms of the quality of programme materials, 85 percent of the respondents selected either 'excellent' or 'very good'. A majority of the respondents believed the programme as well as its content was appropriate and the class room interaction including case studies, toolkit was excellent.

Programme Contents

All the sessions of the training programme were rated above average by the participants. Among these, the sessions on "What is RIA? Overview of RIA, Goals and Results" and "Consultation for RIA" scored better than the others. The session on "Assessing Alternatives to Traditional Regulation" was ranked slightly lower than others. In general, the participants felt that this training programme was very informative.

Additional Inputs

Close to 80 percent of the participants indicated that they would use the knowledge gained in the training programme in their every day job and would like to attend a 5 day training programme to further enhance their knowledge about the subject.

The participants mentioned that the training programme helped them increase their understanding of the RIA concept and its importance. Most of them were of the view that after attending the training programme, they will put in a conscious effort to define the problem in the right manner and weigh the alternatives while taking regulatory decisions – *"I have received better understanding on how to define the problem correctly, why regulations are important, and how their quality can be increased."*

Some of the specific changes to the programme as suggested by the participants included tailoring the course to suit the telecommunication sector by providing sector-specific examples, increasing the number of case studies in general and increasing the course length. Suggestions regarding including participants from other sectors under the same roof for better discussions were also put forward - *"Additional discussion on telecom and broadcasting related cases of RIA implementation would help in better understanding the concept"*

All the participants indicated that they would recommend such a training programme to their colleagues as they believed that all those involved in the process of making regulations should be made aware of the impacts of the proposed regulation – *"Assessment of impact of regulations is an important knowledge area for all working in government and regulatory bodies."*

ANNEXURE II: MEDIA COVERAGE

1. <http://www.aninews.in/newsdetail3/story248835/cuts-organizes-two-day-training-for-trai-officials.html>
2. http://www.business-standard.com/article/news-ani/cuts-organizes-two-day-training-for-trai-officials-116011900674_1.html
3. <http://www.htsyndication.com/htsportal/article/CUTS-organizes-two-day-training-for-TRAI-officials/11000921>
4. <http://news.webindia123.com/news/articles/Business/20160119/2773408.html>

ANNEXURE III: AGENDA

MONDAY, 18TH JANUARY, 2016

- 10:00 – 10:30 **Registration and Tea**
- 10:30 – 11:00 **Opening Session & Introduction of Participants**
- Pradeep S Mehta, Secretary General, CUTS International
 - Ram Sevak Sharma, Chairman, Telecom Regulatory Authority of India
 - Anil Kaushal, Member A, Telecom Regulatory Authority of India
 - Sudhir Gupta, Secretary, Telecom Regulatory Authority of India
- 11:00 – 11:15 **Group Photo and Tea Break**
- 11:15 – 12:15 **Session I: Introduction to RIA: What is RIA? Overview of RIA, Goals, and Results**
- This session will introduce the concept of RIA, what are the goals, purpose, challenges, etc. for undertaking RIA.
- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates
- 12:15 – 13:30 **Session II: Using RIA to Reduce Regulatory Failures**
- This session will review the most common reasons why regulations fail to achieve their goals, and discuss how such failures can be reduced through RIA based on better problem identification and identification of the baseline. Based on several real examples of costly regulatory failures, including from telecom sector, the session will discuss how regulators can correctly identify the problem and its underlying causes. The second step is defining the baseline, that is, what would happen without government action.
- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates
- 13:30 – 14:30 **Lunch Break**
- 14:30 – 15:30 **Session II (Contd)**
- 15:30 – 15:45 **Tea/ Coffee Break**
- 15:45 - 17:30 **Session III: Why do we care about regulatory impacts? Looking inside the RIA methods**
- Review basic concepts important to understanding the application of RIA. Concepts to be covered include:
- * What are regulatory costs and benefits? How do we measure them? What does value mean in RIA?
 - * What are the analytical methods?
 - * What are opportunity costs?

- * When are distributional effects important?
- * What happens when benefits and costs are asymmetric?

Some examples from developing countries and the telecom sector will also be used to explain the concepts in this session

- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates

TUESDAY, 19TH JANUARY, 2016

09:30 – 11:00 **Session III continued**

11:00 – 11:15 **Tea/Coffee Break**

11:15 – 13:00 **Session IV: Administrative burdens and the use of the Standard Cost Model: Concepts and interactive case study on Telecom Sector (Group Exercises)**

Administrative burdens on businesses and citizens are increasingly becoming a concern. Many governments have committed to measuring and reducing the administrative burden using a method called the “Standard Cost Model” (SCM) for measuring the time needed to comply with administrative requirements and extrapolating from firms to entire economies. We will examine the use of the SCM – its strengths and limits – in this session. In this interactive case study exercise, participants will break into smaller working groups and develop the core elements of SCM and make presentation on their findings.

- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates

13:00 – 14:00 *Lunch Break*

14:00 – 15:30 **Session V: Assessing Alternatives to Traditional Regulation**

A vital but difficult part of RIA is development and assessment of alternative policy instruments and different regulatory designs. We will examine how such alternatives can be systematically developed, assessed, compared and selected. Alternatives to be discussed include:

- Information disclosure and education campaigns (labelling, quality marks, public campaigns)
- Self-regulation and co-regulation (codes of practice, technical standards)
- Third party regulation (mandatory inspections/audits by non-government parties)
- Performance-based rules rather than means-based, including variants such as the Open Method of Co-ordination and Framework Directives
- Market based instruments (taxes, subsidies, user charges, risk payments, insurance)

- We will discuss what alternatives work where and when, taking into account different stages of development of countries, and our experience in implementing RIA in developing countries
- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates

15:30 – 15:45 Tea/Coffee Break

15:45 – 17:00 Session VI: Consultation for RIA

Stakeholder consultation is an important strategy for quality control and data collection. This session will discuss the means of consulting and communicating with stakeholders as part of carrying out the RIA, and how to avoid the pitfalls of poor consultation. One of the most costly and time-consuming RIA activities is the collection of data for the analysis. This session will also examine techniques to collect data for RIA.

- Scott Jacobs, Managing Director, Jacobs, Cordova & Associates

17:00 – 17:30 Closing Session
