

**BUSINESS TEST PANEL:
DRAFT QUESTIONNAIRE FOR PILOT PROJECT ON AMENDMENT
OF THE EUROPEAN ACCOUNTING DIRECTIVES**

UNICE COMMENTS

UNICE is grateful to the Commission for this opportunity to give its views on the draft questionnaire to be used when consulting the Business Test Panel and would like to stress that this paper is a rough, informal compilation of comments received from a small number of members of its working group on "Cost/Benefit Analysis".

1. Before turning to the draft questionnaire itself, UNICE would like to touch briefly on the question of the explanatory memorandum. The comments received from members point to the fact that, rather than giving detailed background information, it would be preferable if this document were to contain more details about the proposal itself. In fact, UNICE believes that the information sent to the companies involved should comprise the full text of the proposed piece of legislation.
2. Regarding the draft questionnaire, UNICE has one preliminary, but fundamental comment. In its view, insufficient emphasis is placed on the actual financial cost of the proposals. UNICE believes that the main objective must be to assess the actual cost to business of any proposed measure and it must be possible to place a relatively precise figure on the various elements which are seen as an additional burden to the companies concerned.

In this context, UNICE notes that financial costs are mentioned only under question D.1, which deals with physical investments. Yet, a similar question could be asked regarding the administrative burden / relief under section C. The same applies to the questions relating to the cost of reorganisation or worker training (sections D.2 and D.3). All these elements can be estimated and companies should therefore be invited to quantify all items of the expected burden.

In UNICE's views, this is absolutely fundamental: unless companies give an estimate of what the proposals will cost "in money terms", the consultation process can only achieve a more or less subjective assessment.

3. With regard to question D.1, it has also been noted that the costs associated with new equipment, particularly software, does not just involve the cost of purchasing the equipment but also that of adapting it to the individual business needs and maintaining it.

4. While UNICE understands that this is the first draft of a questionnaire related to a specific first pilot project in the accounting area, it is concerned that these apparently simple questions may cause difficulties if they were put to a large company in the case of extensive measures in the area of health and safety at work or environmental protection, for example. UNICE believes that the questionnaires might have to be adapted to such completely different cases.
5. It has also been commented that the questionnaire has no explanations and what is missing above all is a presentation of why it is in the interests of companies to take part in what they might perceive as just a time-consuming exercise.
6. Finally, based on the draft questionnaire as it stands, UNICE has some concerns as to how the answers will be evaluated. If completely different firms are surveyed, it will not be possible simply to aggregate the responses – there must be a weighing by company size. However, even if this were done, UNICE believes it will be difficult to see what conclusions can be drawn unless more emphasis is placed on quantifying the costs.

In conclusion, UNICE supports the Commission's efforts in this area and it believes that the establishment of the Business Test Panel is a first step in the right direction. However, more emphasis ought to be placed on quantifying the actual cost to business and UNICE believes that the Community authorities should give clear priority to genuine cost assessment along the lines of the UK or US models.
