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NTWADKPORTZIUMPRONYWUEIQP

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BORTZIMTOPUZEPORHKOITUCHNVBFAMOD

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AKSWUE**ASSESSMENT**HNVBFGWK RATNPO

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BETTER REGULATION IN LATIN AMERICAN COUNTRIES: A TOOL FOR ACCOUNTABILITY?

RENNY REYES



**Better Regulation in Latin American Countries:
A tool for accountability?**

Betere regelgeving in Latijns-Amerikaanse landen:
Een instrument voor accountability?

Proefschrift ter verkrijging van de graad van doctor aan de
Erasmus Universiteit Rotterdam op gezag van
de rector magnificus
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ALMA MATER STUDIORUM
UNIVERSITÀ DI BOLOGNA



Universität Hamburg



*To my family,
To my past and future self*

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Doing a PhD is certainly more about the journey than the destination. It is a journey in which I got the opportunity to study in depth something that I am passionate about; and at the same time I got to test, break and adjust the limits and frontiers of my knowledge, of my research capabilities, and, most importantly, of myself as a person.

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Finalizing a PhD Thesis feels a lot like a beginning, because I am overwhelmed by a sense similar to the one I have when I see the ocean: An endless world open with new opportunities and new challenges ahead to discover, but now with a set of new skills and knowledge acquired during the process.

BETTER REGULATION IN LATIN AMERICAN COUNTRIES: A TOOL FOR ACCOUNTABILITY?

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LIST OF ABBREVIATIONS

EU	European Union
IA	Impact Assessment
IRA	Independent Regulatory Agency
OECD	Organisation for Economic Cooperation and Development
PEC	Policy Evaluation Cycle
RA	Regulatory Agency
RIA	Regulatory Impact Assessment
ROB	Regulatory Oversight Body
SCM	Standard Cost Model
US	United States of America

INTRODUCTION

Often, academic research is prompted by the personal interest of the researcher on a topic or an area of study. This is not the exception. A few years ago, I began studying policy assessment, a set of instruments used by some countries as a part of their policy-making process. This entails the identification of a policy problem and the assessment of potential regulatory or non-regulatory solutions to identify the benefits, costs, risks and other effects that the solutions would create. It also entails consultation with stakeholders; as well as the monitoring and assessment of regulations after their entry into force, to determine whether they are still producing the desired effects that motivated their enactment. I refer to this set of stages as the Policy Evaluation Cycle (PEC). The aim of the use of these instruments or stages is to inform the decision-making process of regulators in order for them to be able to enact regulations that are efficient, effective or serve specific goals. Lastly, policy assessment also concerns the governance of the aforementioned instruments and processes. All of these, the PEC and the governance of the instruments and processes, are referred to as the better regulation agenda.

It is known that countries use laws and regulations as a means to achieve specific goals or as correctors to the undesired results of a self-operating market, to inequality, to unbalanced distribution of resources, and in general, to endogenous and exogenous factors that pull countries away from their objectives. In this sense, unassessed regulations can produce undesired adverse results, can clash with other existing regulations, can be incompatible with current market trends, or with preferences of the population or with technological improvements. They can even produce effects directly opposite to those needed to address the problem for which they were enacted.

The use of scientific instruments to assess regulatory problems and regulatory proposals before their enactment, and afterwards through various points of regulations' lives, however complex, seems to align with the overall normative goal of regulations and government intervention. From that stance, the adoption of a system or policies for assessing regulations is justified and, some may argue, desirable for most legal systems.

Since these policies have been developed, adopted, and implemented by European countries, the United States, and other developed countries, I began researching on whether other regions were following the same steps. In that sense, in the last few years, a steadily increasing number of Latin American countries have been adopting instruments for policy assessment as part of their regulatory policy. I had a particular interest in researching this trend in this region, because it struck me as interesting why a group of countries, the majority of which are developing countries with similar constitutional structures, decided in a short period of time to adopt a complex, and resource-consuming,

set of instruments and policies for regulatory evaluation as part their regulatory-making process.

Going back some decades, during the 1990s and the early 2000s, the Latin American scenario regarding regulatory production was characterized by an explosive growth of regulations and regulatory agencies. Arguably, this shift from the centralized provider-state to the regulator-state represented a considerable rise in the rate of delegation in the regulatory-making process. To some degree, this increase in the legislative work and also on regulatory agencies has also favored opportunities to improve regulatory efficiency, address identified market failures, and take the decision-making process closer to those affected.

Therefore, this new trend that I observed in the Latin American region of adopting policy evaluation instruments seemed to respond initially to some of their regulatory needs. However, it could potentially also be explained by other rationales closer to the specific needs of the region. As with any important regulatory topic, whether to adopt or not policy evaluation instruments is not a binary question, or at least it should not be. It implies the consideration of several elements and changes to the decision-making process, to the legal culture, and to the regulatory governance of a country, which in turn means the use of already limited resources. Therefore, the desired and undesired effects that the adoption and implementation of a new process within the decision-making machinery of a country should also be considered. This requires more in-depth understanding, to be able to comprehend its inner workings, the elements that compose it, and the potential that they might have to address certain regulatory goals, as well as their shortcomings.

Digging deeper into the rationales that countries may have to adopt these administrative arrangements into their decision-making processes, due to the necessary delegation that happens in the regulatory-making world, there is a rationale that comes forward: the need to have transparency and accountability measures in place. It could be argued that achieving these goals is desirable for Latin American countries as well, as in the last decade there has been a surge of demand for accountability, transparency and less corruption in the region.

The literature argues that because of the inherent characteristics of policy evaluation and of the processes that need to be undertaken for assessing regulations, one of their features is that they contribute towards accountability (Ogus, 2004; Radaelli, 2010; Renda, 2015). However, is it that straight-forward that adopting a better regulation agenda can contribute to accountability in the regulatory-making process of a Latin American country? In this Thesis, I argue that even though this could be true, there are many considerations to

incorporate when answering this question, particularly related to the legal system, the decision-making process, and regulatory relationships that exist in those countries. Therefore, I embarked on this research.

1. Research Questions

Considering the foregoing, in this Thesis the research concerns the policy assessment arrangements recently adopted and implemented in the Latin American region, and specifically the potential for accountability that these arrangements may have. This prompted a main research question:

Why are Latin American countries adopting better regulation agendas? Can this contribute towards accountability, and if so, in which conditions?

On the road to answering these over-arching research questions, several other research questions arise. For this, in each Chapter of this Thesis the aim is to answer a particular set of sub-questions that are divided as follows:

Chapter 1

1. What are the rationales behind the adoption of policy evaluation systems within the regulatory-making process of a country?

Chapter 2

1. Which are the composing elements of a regulatory evaluation structure?
2. Which are the options that a country or administration can choose from to compose its regulatory evaluation structure?
3. Which type of regulatory evaluation arrangement has the potential to create the conditions and incentives for the actors in a legal system in order to achieve specific regulatory goals?

Chapter 3

1. Which are the policy assessment goals and structures set by Latin American countries for their better regulation agenda?
2. Do the elements chosen by Latin American countries for each component of the structure correspond to the goals previously set by selected countries?

Chapter 4

1. Which accountability relationships exist in the regulatory-making arrangement of Latin American countries?
2. Which accountability problems can be identified in the regulatory relationships of a country with a presidential system?

Chapter 5

1. Could the Policy Evaluation Cycle contribute towards accountability, and if so, in which conditions?
2. Considering the type of relationships that exist in this regulatory-making system, is it possible to address those problems with a better regulation agenda?

2. Academic Relevance

The study of all of the sub-components necessary to answer the main research question set for this Thesis, can be done from many areas of study. However, there are some that are evident, and not necessarily usually studied together. The first one is the literature on policy assessment; the second one is administrative law; and the third one is public law and economics. Granted, initially for the more skeptical reader the connection between these areas of study might not be evident; therefore, an explanation is needed.

First, the link between policy assessment and law and economics has been previously explored by Renda (2011). He explained that *ex ante* assessment procedures would benefit from establishing arrangements that would consider how incentives affect the behavior of participants, and not merely the cost and benefits of the regulations. This left a whole set of questions to be answered in that field, some of which will be addressed in this research. The study of the instruments used for policy assessment, the scope of the assessment, its governance and the interaction between the combinations of all these elements, need to be researched using the literature on policy assessment in its intersection with public law.

As indicated previously, the creation of regulations and the need for more efficient regulations are one of the main motivators for the existence of policy assessment procedures. Thus, how regulations are made, and more particularly, the legal and constitutional system in which this process is introduced, also plays a role in the eventual result of the assessment. In this sense, since the countries being considered for this study are Latin American countries, all of which have a presidential constitutional system, legal systems based on civil law, and a specific decision-making structure, the study of this needs to be done with the instruments that the public law and economics, and public administration literature provide. That is, the analysis of the actors that exist in that system

and that participate in the decision-making process; their appointment and removal; the interactions between these actors; the set of rules that this specific legal system sets to follow; and the incentives, costs, externalities, and risks that they generate to the participants of this complex web.

Lastly, the focus of this research is mainly the potential for accountability that a regulatory evaluation structure could have, considering the relationships identified within a presidential constitutional system. Therefore, it is necessary to use the tools provided by the administrative law literature, specifically the literature on delegation and accountability. For a more complete analysis of this topic, the concept of accountability is considered; its components; the interaction that might make a person accountable in the state-individuals relationship that this branch of law focuses on, as well as other concepts.

Considering the foregoing, the novelty of this work is neither the analysis of the existing policy assessment methodologies nor of the governance structures by themselves, but rather their interaction. It provides a holistic perspective which integrates public law, administrative law, particularly accountability, into policy assessment and law and economics. Academically, these areas of the law are often treated as separated, but here the aim is to integrate them.

In addition to bringing together these streams of literature, the main contribution of this Thesis is providing a framework with which it is possible to measure the contribution of the Policy Evaluation Cycle to accountability, considering the specificities of the relationships that are present in a typical presidential constitutional system of a Latin American country.

Furthermore, the contribution of this Thesis might be relevant not only to Latin American countries but also to other countries with presidential constitutional systems that are adopting or have implemented a regulatory evaluation structure. This is intended to fill an important gap in the literature, but it could also open the door for further research and be useful in practice.

3. Societal Relevance

Societies evolve in their preferences, and such changes are often reflected in the demands that the population has towards their politicians and governments. Likewise, these changes should reflect on the responses of their governments to satisfy those demands. Responding to a societal demand of perhaps regulations that are more efficient or less burdensome, of more transparency and accountability in regulatory-making process, or just responding to

external pressure, Latin American countries are increasingly adopting and implementing regulatory evaluation arrangements as part of their decision-making processes.

There has been a growing tendency of citizens demanding higher transparency, sanctions, and accountability from their politicians and decision-makers. The results of these demands have ranged from removing sitting presidents from office through impeachment; to incarcerating public officials; to demanding accountability and transparency from their bureaucrats and politicians. When politicians depart from these preferences, and the citizens are aware of this departure, they might react with their votes. This might explain why governments and politicians are willingly adopting tools that are bound to decrease their discretion in decision-making, and that would make them accountable to the population. Regardless of that motivation, Latin American countries are implementing these arrangements and moreover, some are doing so with the explicit goal of increasing accountability in their regulatory production.

This relatively new phenomenon is bound to change the decision-making process of Latin American countries to some degree, and, perhaps the relationships between the government and its stakeholders. In the current stage that the region is at, this study gains timely relevance. Particularly, the identification of the different forms that the regulatory policy structure can adopt to respond to various regulatory goals; and more importantly if and how the use of the Policy Evaluation Cycle can contribute towards increasing the accountability of the actors within regulatory-making process.

4. Scope and Methodology

The topic of this Thesis can be explored from multiple angles, and thus, several questions arise. This makes it necessary to limit the scope for the research. On the one hand, this Thesis focuses on policy assessment policy structures and the better regulation agenda at the strategic and administrative level. It does not explore the policy assessment of a particular market, economic or legal area, but instead it pays attention to the organizational components of these arrangements. Nevertheless, the eventual findings and conclusions of this Thesis could be later applied to specific sectors.

On the other hand, the countries examined in this Thesis are all Latin American countries; therefore, the research is geographically limited. Specifically, it collects and analyzes data from Mexico, Peru, Chile, Colombia, El Salvador, Ecuador, Brazil, Costa Rica, Argentina and the Dominican Republic, which are the countries of the region that have adopted some type of instruments for policy assessment as part of their regulatory policy, up to June 1st, 2019. The common features of these countries, such as their presidential constitutional

system, type of government and collaborative work regarding their regulatory policies, allow for a joint analysis of their better regulation agendas. It is granted that the eventual findings may also apply to other countries with similar characteristics or constitutional systems; however, they are not considered for this research. The same might also hold for other constitutional systems such as parliamentarism, which could be the subject of further research.

Just like with the scope of the research, this topic can be researched using a variety of methodologies. In that sense, first, Chapter 1, relies on theoretical analysis, by utilizing combined strands of literature such as public law, accountability and policy analysis. Chapter 2 gathers information about the different policy assessment instruments and regulatory policies that European countries and the United states have used, by analyzing their existing regulations, policy documents and publications on the topic. It uses law and economics and policy analysis literature, to examine how the different elements are structured, to determine the goals they are set to achieve as well as the incentives they create, and to organize these elements into a framework centered in the goals that they seek.

Chapter 3 studies the policy assessment structures that Latin American countries have adopted. It first collects the data from the legal instruments that contain provisions regarding their regulatory policy, through the reading and analysis of the constitutions, laws, decrees and other legal documents enacted in the researched countries. In addition to desk-research, it contrasts the structures adopted by these Latin American countries with the framework developed in Chapter 2. This allows for the analysis of the structures and identification of patterns in the better regulation agenda of the region.

In turn, for Chapter 4, the methodology is theoretical analysis, relying on the existing literature on accountability to analyze the governance arrangements of Latin American countries and eventually apply it to the analysis of the Policy Evaluation Cycle. Lastly, Chapter 5 synthesizes the insights from the accountability literature and the policy assessment literature to develop a framework for assessing the accountability of the policy evaluation cycle, within particular regulatory relationships. Scorecards were designed to assign a score to the stages of the policy evaluation cycle based on their contribution towards accountability in a specific regulatory relationship. These scorecards are based on the characteristics of the PEC and the relationships, as defined by the theory, empirical studies, and practice in their best-practice scenario that are analyzed and researched in this Thesis.

Referring to both the scope and the methodology, it is relevant to point out that the findings of this Thesis are not tested empirically in a country or an agency, and this could be done in further research.

5. Structure of the Thesis

In the light of all of the foregoing considerations, there is now an explanation of how this Thesis is divided and structured, as well as the content of each Chapter, in the course of answering the research questions.

In Chapter 1, the intention is to provide an initial general theoretical framework. So it discusses the approaches from the literature towards policy assessment, beginning by understanding its basic concepts. Likewise, it examines the rationales for the adoption of the better regulation agenda and policy assessment structures. As the Thesis progresses, it uses that theoretical framework to analyze from a Law and Economics approach the implementation of policy evaluation by Latin American countries, as well as the goals that these countries aim to meet as a result. This Chapter answers the following research question: What are the rationales behind the adoption of policy evaluation systems within the regulatory-making process of countries?

After providing an understanding of the different rationales that a country may have to adopt policy evaluation into their policy-making process, Chapter 2 discusses the practical terms of policy assessment, and what the implementation and use of the better regulation agenda entails. It examines the different elements to be considered when adopting and implementing a policy evaluation arrangement, as well as the intended goals of the different choices within the legal system. This Chapter considers specifically the scope of the policy assessment; the use of the PEC to assess regulations at several points of their lives; the different evaluation tools that are commonly used; and the governance and oversight of the regulatory evaluation process. In this sense, in this Chapter the aim is to identify whether the different choices to build the assessment structure could lead to the attainment of specific regulatory goals. For that, it analyzes the potential incentives that the choices concerning each element might generate. These findings are helpful in two ways: First, they facilitate understanding of the trends and provide a clearer road map for the adoption by a country of policy assessment structures and governance; and second, they serve as a guide to compare with existing arrangements to determine whether there is coherence between the structure and the goals. The research questions that Chapter 2 aims to answer are (i) Which are the composing elements of a regulatory evaluation structure? (ii) Which are the options that a country or administration can choose from to compose its regulatory evaluation structure? and (iii) Which type of regulatory evaluation arrangement

has the potential to create the conditions and incentives for the actors in a legal system in order to achieve specific regulatory goals?

Because the research focus of this Thesis is on Latin American countries, two important research questions rise: (i) Which are the policy assessment goals and structures set by Latin American countries for their better regulation agenda?; (ii) Do the elements chosen by Latin American countries for each component of the structure correspond to the goals previously set by selected countries? In this sense, Chapter 3 evaluates the better regulation agenda in Latin America to understand which goals these countries are pursuing with the adoption of this agenda; the scope and time of the assessments, the evaluation tools being used, as well as their governance. Bringing together the findings from Chapter 2, it contrasts the better regulation agenda of selected countries with the policy assessment structures discussed, to analyze whether the structure chosen is oriented towards achieving their chosen goals, whether it has the potential to generate the incentives and create the effects expected from it to achieve the regulatory goal chosen, and/or whether there are discrepancies.

The policy assessment structure required for goals such as an accountability and efficiency, particularly considering the use of the PEC and its different stages, can be analyzed further by first studying what the goals entail in practical terms, how it operates within a presidential constitutional system, and eventually how the assessment itself is designed, or, not towards the chosen goal. In Latin America there is a social requirement of more transparency and accountability in the regulatory-making process, and thus it seems to be set also as a goal for having a better regulation agenda. Considering the foregoing for the rest of this thesis, there is a focus on the use of policy assessment systems as an accountability tool.

The literature holds that policy assessment can enhance the accountability of the policymakers towards their forum. Here it is argued, however, that this potential to enhance accountability is not necessarily a default. How these policy evaluation systems are designed is relevant to whether they can address the accountability issues that exist within the different relationships of the policy-making realm. But to be able to know that, it is first necessary to understand what exactly accountability is, and more specifically, what accountability looks like in the relationships that exist in the decision-making arrangements of a Latin American country, since they have a presidential constitutional system. Therefore, in Chapter 4 the aim is to answer the following research questions: (i) which accountability relationships exist in the regulatory-making arrangements of Latin American countries? And (ii) which accountability problems can be identified in the regulatory relationships of a country with a presidential system?

Finally, Chapter 5 joins two relevant streams of literature, accountability and policy evaluation, to determine if, as claimed by the literature, policy evaluation instruments are set to increase accountability in the regulatory-making process of a country. While the PEC, as a combination of policy evaluation stages, might contribute to accountability, the claim is that its contribution, compared to a scenario where such stages are not in place, might be different in the various stages of the cycle, and for different regulatory relationships. Therefore, there is an analysis of how accountability plays out throughout the various stages of the PEC, and how it plays out differently throughout these stages within the diverse types of regulatory relationships that exist in the presidential constitutional system that Latin American countries have. In this Chapter the aim is to answer the following research questions: (i) considering the type of relationships that exist in this regulatory-making system, is it possible to address those problems with a better regulation agenda? And finally, (ii) can the Policy Evaluation Cycle contribute towards accountability, and if so, in which conditions?

CONCLUSION

This research started with two complementing research questions: Why are Latin American countries adopting a better regulation agenda? Can this contribute towards accountability, and if so, in which conditions?

The answer to the first question initially identified three rationales that might explain why Latin American countries are adopting and implementing regulatory policies: to enact more efficient or effective regulations; to increase accountability in the regulatory-making process; and as a result of policy transplant or third-party influence. These rationales were explained by the literature on public law and economics, administrative law, and transplant theory, respectively.

The answer to the second research question required, however, a more complex and lengthy analysis. Based on the existing literature and international practice, I studied in detail the components of a regulatory policy and their governance. This included the scope of the assessment; when are the assessments performed; the tools used for the assessments; and the governance of the assessments. I organized these components into several matrices based on the rationales previously identified. It served to understand how these conditions could be created in a way that the intended goals that countries had for implementing a better regulation agenda could be achieved.

With this part of the research, I saw that the interaction between regulatory evaluation tools and their governance is generally under-studied and that Latin American countries are not the exception. Since these countries have been adopting and implementing different forms of a regulatory evaluation policy over the last decade, they were the focus of this research. In this Thesis, I presented an updated detailed description of the policy assessment arrangements of the Latin American countries that have either adopted or implemented them. In turn, I studied the different arrangements that these countries have chosen for their policy assessment structures, as well as their governance, and identified common trends.

Most of the Latin American countries studied expressly stated regulatory accountability as one of the goals for adopting their better regulation agenda. In other words, the adoption of a regulatory evaluation policy was also aimed at increasing accountability in their regulatory-making process, in addition to efficiency and reduction of regulatory burden. Therefore, I focused on accountability to answer the second research question.

Even though accountability is not a natural Law and Economics term, it is used in the regulatory field. According to the leading literature, a regulator is accountable to its forum when it informs them of his actions; there is a space for discussion of the actions; and lastly,

when there are consequences, either positive or negative, to the actions of the regulator. These are known as the accountability dimensions: information, discussion and consequences.

To be able to apply the lessons from the accountability literature to the particularities of regulatory evaluation, I first examined how the decision-making process is structured in presidential systems. This is because the researched Latin American countries have this constitutional system, and thus their accountability relationships are framed within the particularities of this system. In Latin American countries, most of the regulatory decisions are made by a body of the executive power, and the public administration is mostly directed and accountable to the president. This means that there is a principal-agent relationship between these public administrations and the president. However, there are other bodies of the public administration that are independent and are not directly accountable to the president, which are independent regulatory agencies. These agencies are thus accountable in other ways, and to other forums, such as their stakeholders, oversight bodies or courts.

This showed that accountability is expressed differently depending on the relationship and interactions between the actors and their forum. Consequently, this means that the contribution on accountability that a regulatory policy might have would be closely linked to the relationship being considered.

Going back to the topic of regulatory evaluation, the different stages of assessing regulations are public consultation, *ex ante* assessment, drafting and implementation, monitoring and *ex post* assessment. I referred to those stages as the Policy Evaluation Cycle. Each one of the stages have a different function. They generate different incentives for the regulator, depending on the relationship on which the stages are executed.

The main contribution of this Thesis is thus bringing together these strands of literature and building a framework that assesses the contribution towards accountability of each stage of the Policy Evaluation Cycle on different regulatory relationships. The framework scores each stage by evaluating them on each dimension of accountability. It shows to which degree the stages and the cycle as a whole contribute towards accountability in a specific relationship of a presidential constitutional system. The results showed that even when a policy assessment structure might contribute towards accountability, this contribution is not absolute as it only operates in specific relationships, and even more, in particular stages of the Policy Evaluation Cycle and at different degrees.

Main findings and contributions to the literature

The first research question was “why are Latin American countries adopting a better regulation agenda?”. This question arose from a simple and verified observation: In the last two decades Latin American countries have been increasingly and steadily adopting a better regulation agenda. This agenda is composed of instruments for assessing their existing and potential regulations, and of governance structures for the use of these instruments and for oversight of the assessments. By 2019, ten Latin American countries, namely, Mexico, Colombia, Chile, Costa Rica, Ecuador, Chile, Dominican Republic, Peru, Argentina and Brazil had adopted a better regulation agenda at different degrees and at different points in time. Enough to make it a trend.

With the lessons from the literature in public law & economics, policy assessment, public law, accountability and transplant theory, I identified three rationales that might explain this trend. In that sense, the first identified rationale for adopting this agenda is the main normative use of policy assessment tools: to improve the quality of regulations. This entails the evaluation of the effects of existing or future regulations that serve to inform the decision-maker of the most efficient or effective (depending on the country’s or regulator’s goals) options to address the economic, regulatory or social problem at hand.

The second rationale I identified is enhancing regulatory accountability. The enactment of primary legislation or secondary regulations comes always from a delegation done by either the people or from one power of the state to another or to a body within the same power. As held by the Agency Theory, the principal, who delegates, needs to foster a system where he can monitor the actions of his agents or create the right incentives to align the acts of the agent with the interests of the principal (Ross, 1973). Thus, the governance of a policy assessment structure, that provides for transparency, oversight and reports, as well as the systematic evaluation of the regulations enacted could contribute towards enhancing accountability. This would overcome one of the main downfalls of delegation, which is that the delegating party does not have sufficient expertise or time, or it could be costly to have, to oversee the actions of the delegated party. Certainly, in that case, it would require that the reports and information provided are understandable to the delegator. At the same time, having a regulatory evaluation structure might provide positive and negative incentives to the agents to align their actions with the preferences of their principals.

The third rationale is third-party influence, which can be partly explained by the transplantation theory. In that sense, Latin American countries might be influenced by the practices of other countries in the region, as well as by the recommendations of international or regional organizations. From the research it was evident the cooperation

between Latin American countries, led by Mexico; as well as the active promotion of the agenda by the OECD in the region. Countries often respond to the need of signaling that they conform to standards and international practices. This could be to attract investors or signal reliability. At other times this action can be motivated by the countries' self-interest when the adoption of a policy is a requirement to be a member of an organization or group. Likewise, the motivation might be to give the appearance that the government or politicians have a system that responds to accountability or to efficiency and give the impression that they comply with the internal requirements of the population or demands of the international community. Of course, most likely these rationales did not operate in isolation and a combination of them might accurately explain the trend in the region. One of the contributions of this Thesis is the identification and initial analysis of these rationales, using different strands of literature. In that sense, each one of these rationales can be the subject of individual research to determine whether the adoption and implementation of a better regulation agenda or a regulatory policy is justified by the chosen rationale.

In the topic of policy assessment, international practice has pushed the literature to study the phenomena and to analyze from different points the use of certain instruments, or the organizational and governance structures into which these instruments have been adopted. Even in this topic, there is the old question of the chicken and the egg. The practice may have come first; however, it is deeply guided by the literature, the educated analysis of previous experiences, and the adaptation of the practices that have not worked and those that have. In that sense, after understanding the rationales for the adoption of a better regulation agenda, it was essential for my research to understand what that adoption and implementation looked like in practice. Thus the relevant components to be considered for a regulatory evaluation policy that I identified from the literature on policy assessment and international practice were (i) scope of the assessment; (ii) the moment(s) for the assessments; (iii) the tools used for the assessments; and (iv) the governance of the assessments.

For each one of those components, there were different options to choose from. This was a stepping-stone to arrange each of the options based on the goal that they potentially serve. I based these arrangements on the common practices from international experience, the findings and interpretation of the specialized literature in the field of policy assessment, public law, administrative law and agency theory. The result of this merge was the second contribution of this research: A workable framework or matrix that contains several proposed arrangements of the options of each element that compose a regulatory evaluation policy arrangement. Each arrangement is based on the rationales previously

identified, in a way of understanding how these conditions could be created for those goals to be achieved.

It showed, for instance, that when accountability is one of the goals of adopting a regulatory evaluation policy, the structure of the regulatory policy is expected to include in its scope secondary regulations enacted by regulatory agencies. Likewise, regulations are expected to be assessed through all stages of the Policy Evaluation Cycle, using regulatory evaluation tools such as SCM and CBA. Regarding oversight, it is expected that the process of evaluating regulations as well as of enacting regulations is properly assessed by an oversight body, to address the issues drawn out by the Agency Theory.

Up to this moment, neither the literature nor international practice had organized the different elements of the governance of policy assessment to focus or follow a specific goal. In that sense, the proposed framework provides structure to the different findings of the literature on policy assessment, by arranging the complexity into manageable categories. It also serves as a framework to contrast with the existing regulatory evaluation governance of a country or a sector. This could serve, for instance, to assess whether the regulatory governance arrangement implemented in a country is serving the goal that it is intended for.

The framework, however, does not intend to be a fixed statement on how the elements should be arranged nor does it propose that one arrangement only fits one goal. It is, however, an attempt at identifying and organizing common practices into replicable structures, based on their inherent characteristics and the goals they pursue. Certainly, this proposal presents its own limitations, that can also be seen as opportunities. For one, it has not been tested empirically, and without a doubt it is something interesting for further research.

So far, this Thesis has shown on the one hand the different rationales that countries, and particularly Latin American countries, may have to adopt regulatory evaluation agendas; and on the other hand, what the international practice and various literature strands have shared regarding the governance and use of regulatory policies. This allowed me to build the aforementioned framework and to provide the base to look at the main subject of the research: Latin American countries.

I presented the content of the legal instruments on policy assessment of Latin American countries organized and analyzed based on the common components expected from a regulatory evaluation structure, with its strengths, weaknesses and potentials. Because this is a relatively new phenomenon to the Latin American region, this particular contribution,

though partly descriptive, was first useful for the analysis performed, and can also serve as the base for further research.

I used my framework to contrast it to the regulatory evaluation structures of Mexico, Chile and the Dominican Republic. This exercise revealed that Mexico's governance structure matches what is expected for a country with efficiency as a goal, and partially matches what is expected for a country with accountability as a goal. This could be explained by the fact that Mexico was the first country to implement a regulatory policy, which has been in constant change and improvement. This could have led to the gradual adaption of the system to the needs of the country. On the contrary, it showed that both Chile and the Dominican Republic have structures that do not match some of their revealed goals, mainly when it comes to accountability (in the case of the Dominican Republic) and administrative simplification (in the case of Chile).

Some of the countries examined have accountability as a goal for their policy assessment agendas. One thing that still holds from the initial findings of this Thesis, is that the introduction and implementation of policy evaluation systems in Latin America can be used as a bargaining chip for politicians, as they can respond to the demand for accountability of their population in exchange for fulfilling their own preferences, to remain in power. Considering that, and also considering that all of the Latin American countries studied have a presidential Constitutional system, for the rest of the research I focused on studying accountability as a rationale and a goal for assessing regulations. Thus, getting closer to answering the second part of the research question which was "can the implementation of policy assessment systems contribute towards accountability, and if so, under which conditions?"

Since an accountability relationship requires there to be information, discussion and consequences to the actions of the actor, it was relevant to determine how these relationships operated in the Latin American system. One of the findings of this Thesis was that in the Latin American presidential systems there are many and different regulatory relationships. The actors do not interact with their forums in only one manner. Therefore, there are various accountability relationships. These relationships are complex, and so are their interactions.

Thus, another contribution of this Thesis is bringing together the literature on accountability with the literature on policy assessment. More specifically, when doing so, analyzing policy assessment as a whole, as a structure, and not only particular aspects of it. This exercise aimed at identifying the common grounds between these two areas of study. This is because the literature on policy assessment held that this tool was useful for

accountability purposes. However, the complexity identified on the regulatory accountability relationships of the presidential system needs to be considered when analyzing how the different aspects of a policy assessment policy play into accountability.

It was initially evident that even when it was possible that regulatory evaluation structures could contribute towards accountability, it was unlikely that all stages of the evaluation would contribute equally. Therefore, there were certain conditions to be met. Also, depending on the regulatory relationship where the policy assessment was being performed, different conditions need to exist for the regulator to be accountable to his forum. Consequently, I aimed to answer the last part of the last research question, which asked under which conditions can the implementation of policy assessment structures contribute towards accountability.

I thus created the main contribution of this Thesis: A framework to assess the contribution towards accountability that each stage of the policy evaluation cycle has, considering the particularities of the different regulatory relationships that can be found in a presidential system. I applied the framework to the current practices of policy assessment to determine whether and how public consultation, *ex ante* assessment, drafting and implementation, monitoring and *ex post* assessment, as stages of the policy evaluation cycle, contributed towards the different dimensions of accountability. I adjusted the framework even further to assess the contribution of these stages on different regulatory relationships of a presidential system.

For instance, I assessed the contribution of the PEC to the relationship between independent regulatory agencies and its stakeholders. It showed that in this relationship one of the stages that contributes the most towards each dimension of accountability is public consultation. In this relationship, the regulator cannot be directly punished (e.g. removed) by its stakeholders; however, it relies on its reputation and collaboration of its stakeholders for a good performance. Therefore, its high score in this stage can be explained by the fact that this is the moment where stakeholders can interact directly with the regulator, undertake direct conversations and eventually agree or disagree with a proposed regulation.

Just as with that example, the scoring showed that indeed different stages of the Policy Evaluation Cycle contribute to different degrees of accountability, and some do not contribute at all. Furthermore, it confirmed that this contribution towards accountability is different, based on the regulatory relationship that is been considered.

In addition to this, other findings came from this assessment. The dimensions of accountability can potentially interact among themselves creating spillovers, both positive and negative. Likewise, the stages of the PEC can complement each other and have the potential of mutually reinforcing their contribution towards accountability.

These findings answer the final research question and add to the existing literature when they show that indeed policy assessment structures have the potential to contribute to a greater or lesser extent to the accountability of the regulatory-making process and its actors. However, the contribution of each stage will depend on the stage of the evaluation and on the relationship that exists between the actors that participate in the regulatory process.

Finally, another contribution of this Thesis to the literature is bringing together strands of literature that were previously studied separately. It shows that different types of literature can influence each other in a fruitful way. Even though accountability is not a law and economics concept, this Thesis showed that, on the one hand, its principles and composing parts can be combined with the literature on policy assessment, particularly in the environment of a presidential constitutional system, which can be extended to other systems. On the other hand, they can be used to evaluate the different stages for assessing regulations in a regulatory evaluation framework, considering the incentives that the actors have when interacting with their forum in that realm.

Policy implications, practical uses and further research

From the main findings of this Thesis there are some policy implications that can be drawn, as well as practical uses. In that sense, the first framework developed in this Thesis can be used for countries to assess whether their current regulatory evaluation structure is aligned with the goals that they are pursuing. It can also serve as a guide for which tools, scope or governance a country is expected to have depending on the goal that it is pursuing.

More importantly, the framework developed in this Thesis for assessing the contribution towards accountability of a particular policy assessment set-up could be tested in practice. Latin American countries can assess whether their structure is oriented towards accountability and if so, how well they are doing. In other words, governments or regulatory agencies could use it to assess the contribution of accountability of their current regulatory structure. Depending on which regulatory relationship within their political set-up is important to have higher accountability, and depending on the score that the framework shows, the country could choose where and how to improve its regulatory evaluation structure.

CONCLUSION

Additionally, the framework can be used by international organizations that study and advise countries on their regulatory policies such as the World Bank and the OECD, to assess accountability across jurisdictions that have implemented one or more stages of the policy evaluation cycle. This assessment could be even used to promote the adoption of these assessment tools considering their functions as accountability instruments.

Since this is a first attempt at creating this framework, it can be of course refined and improved. This could be done, for instance, by adjusting the scoring methodology to better reflect the importance (or lack thereof) of a statement or of a practice.

It is relevant to point out that the framework is designed to evaluate regulatory relationships within a presidential system in Latin American. Evidently, it can also be used by other countries that have the same government system, perhaps adjusting the statements and possibly the scoring. Nevertheless, even though it is designed for a presidential system, this framework can be modified and extended to other forms of government, such as a parliamentary system or to international organizations. This will of course require further research. First, it will be necessary to identify the regulatory relationships that exist in the chosen system, how the actors and forums interact with each other, to determine their accountability dynamics; and second, to adjust the framework to reflect this.

This is a contribution towards the fields and literature on policy assessment, accountability and public administrative law and economics. The avenue is open for improvements and new research in the field. It is open to improve the use of the framework to assess the contribution on accountability of regulatory policies.

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Better Regulation in Latin American countries: A tool for accountability?

In the last few years, a steadily increasing number of Latin American countries have been adopting policy assessment instruments and new governance structures for them, as part of their policymaking process. Even though the literature argues that these instruments serve, among other things, as tools for accountability, for this to be so, it is necessary to take into account the legal system, decision-making process, and regulatory relationships that exist in the adopting countries. This Thesis researches the policy assessment arrangements adopted and implemented in the Latin American region to understand why are these countries adopting and implementing tools for policy evaluation? Can this contribute towards regulatory accountability, and if so, in which conditions?

The Thesis first analyzes the rationales that these countries might have to adopt these regulatory policy arrangements. It then studies the various tools used for policy assessment, paying attention to the scope of the assessments, the times and the stages on which regulations are assessed, referred to as the Policy Evaluation Cycle (PEC), as well as to the governance of these processes. The Thesis develops a framework where each of these components are organized and classified based on which goals or rationales they serve. This can assist countries on deciding how to implement their policy evaluation arrangements, to serve their own goals.

Since all of the studied countries have presidential systems, this Thesis studies how regulations are made in this system, and the multiple needed delegations for policymaking, which results in various regulatory relationships. Thus, the desired accountability of policymakers towards their different forums makes relevant the adoption this agenda for regulatory accountability reasons.

Bringing to together the literatures on public law, accountability and policy evaluation, this Thesis builds a framework for assessing the contribution towards accountability that each stage of the PEC might have in a specific regulatory relationship. The framework shows to which degree the stages, and the cycle as a whole, contribute towards accountability in specific relationships of a presidential constitutional system. The results evidence that even when a policy assessment structure might contribute towards accountability, this contribution is not absolute as it only operates in specific regulatory relationships, and even more, only in some stages of the PEC contributing at different degrees. This framework can be used by governments or regulatory agencies as an instrument to assess the contribution to accountability of their existing or potential regulatory policy structures in order to improve it.

Betere regelgeving in Latijns-Amerikaanse landen: een instrument voor accountability?

In de afgelopen jaren heeft een gestaag groeiend aantal Latijns-Amerikaanse landen regelgevingsbeoordelingsinstrumenten en daarmee overeenkomende beleidsinstrumenten aangenomen als onderdeel van hun regelgevingsbeleidsagenda. Dit wordt een betere regelgevingsagenda genoemd. In de literatuur wordt gesteld dat deze instrumenten, onder andere, dienen als instrumenten voor accountability. Ik stel echter dat ook al zou dit waar zijn, het noodzakelijk is om in de desbetreffende landen eerst het aanwezige rechtssysteem, besluitvormingsproces en de regelgevingsrelaties in aanmerking te nemen.

In deze Thesis onderzoek ik de regelgevingsbeoordelingsinstrumenten die onlangs zijn aangenomen en ingevoerd in de Latijns-Amerikaanse regio en hun potentieel voor accountability. In die zin wil ik de volgende onderzoeksvragen beantwoorden: Waarom worden in Latijns-Amerikaanse landen betere regelgevingsagenda's aangenomen en ingevoerd? Kan dit bijdragen aan accountability en zo ja, onder welke voorwaarden?

Eerst analyseer ik de redenen waarom deze landen misschien een betere regelgevingsagenda zouden moeten aannemen, inclusief het argument van meer accountability in het regelgevingsproces. Vervolgens bestudeer ik hun diverse onderdelen en bepaal welke doelen of redenen deze onderdelen dienen. Daarbij besteed ik aandacht aan de reikwijdte van de beoordelingen, de fasen waarin regelgeving wordt beoordeeld, door mij genoemd de Beleidsevaluatiecyclus [Policy Evaluation Cycle (PEC)], en aan het beheer van deze processen.

Aan de interactie tussen regelgevingsevaluatie-instrumenten en hun beheer wordt doorgaans weinig aandacht besteed, vooral in Latijns-Amerika. Ik bestudeer de verschillende regelingen betreffende regelgevingsbeoordelingsbeleid die deze landen hebben aangenomen en het beheer daarvan. Daarnaast bestudeer ik, omdat al deze landen een presidentieel systeem hebben, hoe besluiten worden genomen in dit systeem en hoe dit leidt tot een belangrijk niveau van delegatie voor regelgevingsproductie. Aldus wordt de reden voor het aannemen van deze agenda voor regelgevingsaccountability relevant. Een regelgevende instantie is accountable jegens haar forum wanneer zij dit informeert over haar acties, er ruimte is voor bespreking van de acties en ten slotte, wanneer er gevolgen zijn, hetzij positief of negatief, van de acties van de regelgevende instantie. Daarom combineer ik als antwoord op de overkoepelende onderzoeksvraag van deze Thesis twee relevante stromingen in de literatuur, accountability en beleidsevaluatie. Hoewel de PEC een bijdrage zou kunnen leveren aan accountability stel ik dat deze bijdrage kan verschillen in de diverse fasen van de cyclus en zelfs kan variëren voor verschillende regelgevingsrelaties.

In deze Thesis bouw ik een kader voor beoordeling van de bijdrage aan accountability die elke fase van de PEC kan hebben in een specifieke regelgevingsrelatie en in het algemeen onder welke voorwaarden beleidsbeoordelingsstructuren meer bijdragen aan accountability. Het kader laat zien in welke mate de fasen en de cyclus als geheel bijdragen aan accountability in een specifieke relatie van een presidentieel constitutioneel systeem. De resultaten laten zien dat ook al zou een regelgevingsbeoordelingsstructuur bijdragen aan accountability, deze bijdrage niet absoluut is omdat deze alleen werkt in specifieke relaties en bovendien in bepaalde fasen van de PEC en in verschillende mate.

La Mejora Regulatoria en Latinoamérica: ¿Un instrumento para la rendición de cuentas regulatoria (*accountability*)?

Durante estos últimos años, cada vez más países de Latinoamérica han adoptado instrumentos para la evaluación de sus regulaciones como parte de su política regulatoria, así como las estructuras de gobierno necesarias para su manejo. Esto se conoce como una agenda de mejora regulatoria. La literatura argumenta que estos instrumentos de evaluación sirven, entre otras, como herramientas para la rendición de cuentas y responsabilidad regulatoria (*accountability*). Aún cuando esta afirmación puede tener mérito, para suscribirla es necesario considerar las condiciones del país que adopta este tipo de agenda, en particular su sistema legal, su proceso de toma de decisiones y las relaciones entre los actores que interactúan en la creación y evaluación de regulaciones.

En esta Tesis estudio los arreglos para evaluación de regulaciones que han sido adoptados e implementados por los países Latinoamericanos, la motivación para su adopción e implementación, y si estos tienen potencial para mejorar la rendición de cuentas durante los procesos de creación y modificación de regulaciones. Por tanto, el objetivo principal es responder estas preguntas: ¿Por qué los países latinoamericanos están adoptando e implementado agendas de mejora regulatoria? ¿Puede esto contribuir a la rendición de cuentas regulatoria, y en caso de que sí, bajo cuáles condiciones?

En esta Tesis primero analizo las razones que los países podrían tener para adoptar una agenda de mejora regulatoria, incluyendo tener regulaciones más eficientes, querer mejorar la rendición de cuentas regulatoria, entre otras. Luego estudio los varios elementos que componen una política regulatoria orientada a la evaluación de las regulaciones, e identifico a cuáles metas o bases lógicas sirven estos elementos. Para esto, presto particular atención al alcance definido para estas evaluaciones, los instrumentos utilizados para realizar dichas evaluaciones, el momento en el que las regulaciones son evaluadas, lo cual llamo el Ciclo de Evaluación Regulatoria (PEC, por sus siglas en inglés), así como el gobierno de todos estos procesos y relaciones que intervienen en los mismos. Como forma de sistematización de este análisis, presento un marco que muestra una serie de combinaciones de estos elementos, y cómo combinaciones particulares pueden servir para alcanzar objetivos regulatorios como eficiencia, rendición de cuentas, reducción de cargas administrativa, entre otros.

La interacción entre los instrumentos de evaluación regulatoria y el gobierno de estos instrumentos y procesos no ha sido estudiada a profundidad, particularmente cuando se refiere a América Latina. Por tanto, en esta Tesis estudio las políticas de evaluación regulatorias que estos países han adoptado, así como sus estructuras para el gobierno de

las mismas y sus interacciones. En razón de que todos estos países tienen sistemas constitucionales presidencialistas, estudio además el proceso de toma de decisiones en este sistema, considerando que, para el proceso de creación de normas y regulaciones, este sistema requiere un grado importante de delegaciones (por ejemplo, del constituyente al presidente como cabeza del poder ejecutivo, del presidente a las agencias regulatorias, entre otras). Por tanto, la adopción de una agenda de mejora regulatoria con el propósito de tener rendición de cuentas regulatoria y generar responsabilidad de los actores involucrados en este proceso toma especial relevancia.

En este sentido, se considera que un regulador es responsable y rinde cuentas (accountable) hacia su público o foro cuando el regulador informa de sus acciones, hay espacio discutir estas acciones, y cuando existen consecuencias, bien sean negativas o positivas, a las acciones del regulador. Por tanto, para responder a la pregunta marco de esta tesis, analizo de manera conjunta dos corrientes de literatura relevantes: la literatura sobre rendición de cuentas (accountability) y la literatura sobre evaluación regulatoria. El argumento que presento es que a pesar de que el ciclo de la evaluación regulatoria estructurada de las regulaciones puede contribuir a la rendición de cuentas regulatoria, esta contribución variará durante las diferentes etapas del PEC, y además podría variar dependiendo de la relación regulatoria de que se trate, es decir, dónde se esté creando y evaluando la regulación y la delegación que fue necesaria para esto.

En esta Tesis creo un marco para evaluar la contribución de cada etapa del PEC hacia la rendición de cuenta regulatoria de los actores que intervienen en el proceso regulatorio. Este marco considera las diferentes relaciones de delegación y jerarquía que existen en el proceso de creación y evaluación de regulaciones, y de forma general permite evaluar bajo cuáles condiciones los arreglos de evaluación regulatoria pueden ser útiles para la rendición de cuentas. El marco creado muestra qué tanto cada etapa, y el PEC en su conjunto, contribuyen a la rendición de cuentas regulatoria en relaciones que existen dentro de un sistema presidencialista. El resultado de la evaluación evidencia que aún cuando una estructura particular de evaluación de regulaciones podría contribuir a la rendición de cuentas regulatoria, esta contribución no es absoluta ni uniforme. Esta solo sucede en relaciones regulatoria específicas, solo en momentos específicos del ciclo de evaluación regulatoria, y la posibilidad de que haya una rendición de cuentas efectiva variará dependiendo la combinación que se dé de esos dos elementos.

Curriculum vitae

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Short bio	
<p>Renny Reyes is a legal consultant and policy advisor on administrative law, public law and regulations for more than 15 years, for regulators and regulated sectors. Likewise, since 2008 she has taught Administrative Law, Administrative Sanctions Law, and Law and Economics at the Pontificia Universidad Católica Madre y Maestra, as well as given guest lectures on policy assessment and public law. She has a European Master in Law and Economics (2012) from Erasmus University of Rotterdam, University of Ghent and University of Vienna and as Master in Economic Regulation. Her PhD research and research interests are focused on regulations, regulatory governance, accountability, policy evaluation and administrative law.</p>	
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European Master in Law & Economics	2012
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Reyes, R. (2005) "Signing of International Treaties: Legal Consequences". <i>Law Review Journal of the Pontificia Universidad Católica Madre y Maestra</i> . PUCMM-RSTA. (2005). (Published in Spanish)	2005
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EDLE PhD Portfolio

Name PhD student : Renny Reyes
 PhD-period : 2015-2019
 Promoters : Alessio Paccos
 Co-promoter : Andrea Renda

PhD training

<i>Bologna courses</i>	<i>year</i>
Microeconomics I	2015
Introduction to European Competition Law	2015
Experimental Economics (Methods)	2015
Theory and Empirics of Comparative Development	2015
Causal Inference	2015
Experimental Economics (Topics)	2015
Modeling in Private Law	2015
Experimental Economics (Topics)	2016
Behavioral Law & Economics Enforcement Mechanisms	2016
Game Theory and the Law	2016
The Political Economy of Growth	2016
<i>Specific courses</i>	<i>year</i>
Seminar 'How to write a PhD'	2016
Academic Writing Skills for PhD students (Rotterdam)	2016
Seminar Series 'Empirical Legal Studies' (Rotterdam)	2017
Modeling the Law (Hamburg)	2016
The Economics of Institutions and Organizations	2016
Economic Growth and Distributive Justice – Part I	2016
<i>Seminars and workshops</i>	<i>year</i>
Bologna November seminar (attendance)	2017
BACT seminar series (attendance)	2016-2019
EGSL lunch seminars (attendance)	2016-2019
Joint Seminar 'The Future of Law and Economics' (attendance)	2017, 2018 and 2019
Rotterdam Fall seminar series (peer feedback)	2016
Rotterdam Winter seminar series (peer feedback)	2017
ATLAS Summer Course	2017
<i>Presentations</i>	<i>year</i>
Bologna March seminar	2016
Hamburg June seminar	2016
Rotterdam Fall seminar series	2016
Rotterdam Winter seminar series	2017

Presentation of “Policy Evaluation and Better Regulation: Latin American Governance Cycle“ at Queen Mary University, London, United Kingdom	2017
Presentation of the paper “Policy Evaluation and Better Regulation: Does the Structure Match the Goals?“ at European Group for Public Administration (EGPA) Conference, Politecnico Milano, Italy.	2017
Bologna November seminar	2017
Joint Seminar ‘The Future of Law and Economics’	2018
Presentation of the research project “Policy Evaluation Systems and Accountability in Latin American Countries“ at the METRO Seminar in Maastricht University. Maastricht, the Netherlands.	2018
Presentation: "Compatibility between Objectives and Better Regulation Strategies: Coordination and Oversight Bodies". Santo Domingo, Dominican Republic. at the VII Meeting of the Ibero-American Network of Better	2018
Attendance (international) conferences year	
Conference: Public Law and Economics: Economic Regulation and Competition Policies	2017
Conference European Group for Public Administration (EGPA) – Milan, Italy	2017
Conference Unpacking the “accountability paradox”in expert-based decision making.	2017
Meeting of the Ibero-American Network of Better Regulation (Red Iberoamericana de Mejora Regulatoria), Santo Domingo, Dominican Republic	2018
Conference EUROPAL Jubilee Seminar: Assessing Better Regulation in the European Union. Radboud University Nijmegen, the Netherlands.	2018
Teaching year	
Cost Benefit Analysis at Dutch Academy for Legislation	2017
Practicum of Introduction to Law in the EMLE	2017
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Others year	
Internship at the OECD Regulatory Policy Directorate for the Measuring Regulatory Performance programme	2019