

The Bureaucratisation of Debureaucratisation

Why Efforts to Cut Bureaucracy Create More Bureaucracy

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English translation

People have complained about bureaucracy for almost as long as governments have tried to cut it. For a century, politicians have called for a halt to new rules, an end to the flood of regulations and relief from bureaucratic overload. They now launch campaigns to “reduce bureaucracy”, “debureaucratise” and “deregulate” at ever shorter intervals.¹

Yet the diagnosis, aims and remedies have barely changed from one decade or country to the next. Governments appoint commissions to uncover excessive bureaucracy, set up departments to tackle it, calculate the costs of existing and proposed laws, call for practical checks on draft legislation, set targets to cut public-sector staffing and pass acts promising bureaucratic relief. Their toolkit remains remarkably limited.

The same ideas also travel from country to country. International comparisons identify supposed leaders in cutting bureaucracy, and other governments copy their methods. Despite differences between institutions, many countries now measure the cost of complying with rules, aim to cut bureaucratic costs by 25% and put expiry dates on legislation. Often, only the labels change. Old phrases such as “bureaucracy brake”, “bureaucracy filter” and “low-bureaucracy legislation” have given way to “smart regulation”, “good governance” and “legislative governance”.²³⁴

Meanwhile, the rhetoric has grown fiercer. Critics accuse ministries, welfare agencies and public-service providers of failing even basic tests: they are too cumbersome, too slow and not digital enough. Wind farms take too long to approve. Road and factory projects get tangled in planning and water-authority procedures. Elaborate tendering rules, rather than a lack of money, are blamed for delays in buying weapons systems. Reformers now demand nothing less than a once-in-a-century overhaul of public administration. They argue that simply removing rules, speeding up planning or

¹ One of the first measures taken by the newly formed government of the Weimar Republic in 1919 was to establish a commission to streamline administrative processes and thereby save costs. The National Socialists also promoted loosening the legal constraints on administrative decisions as a means of accelerating decisions. In the post-war period, even before a new government was formed with the establishment of the Federal Republic, the occupation authorities attempted to streamline bureaucracy.

² International development aid organisations, in particular, play a role through their funding mechanisms in the diffusion of the rhetoric and mechanisms of bureaucracy reduction from industrialised to developing countries.

³ See Kai Wegrich: *The Administrative Burden Reduction Boom in Europe. Comparing Mechanisms of Policy Diffusion*. London 2009, p. 16.

⁴ For terms such as “bureaucracy brake”, “bureaucracy filter” and “burden-sensitive legislative governance”, see Winfried Kluth: *Bürokratiefilter für den Gesetzgeber. Unnötigen Belastungen präventiv begegnen*. Munich 2025, pp. 61, 77 and 83.

improving digital systems will not do. In their view, the state has taken on more responsibility for steering society than it can handle.⁵

Governments have developed a familiar answer to bureaucracy they see as obstructive: appoint a commission. Increasingly, governments, foundations and interest groups convene expert panels and working groups to propose ways to cut red tape. They give members a brief and send them home once they submit their recommendations. Secretariats close, reports go into the archives and experts return to retirement or their regular jobs—until the next commission comes calling.⁶⁷

The press usually welcomes these commissions, but they rarely achieve much. So, after a while, governments appoint another. Its members may know what earlier commissions proposed, but they seldom have time to ask why those proposals failed. They end up repeating demands that have circulated for decades.⁸

When temporary commissions achieve little, governments try making the campaign permanent. Rather than repeatedly appointing new panels, they build institutions devoted to cutting bureaucracy. Some even propose a ministry whose only job is to simplify procedures, streamline other ministries and move services online. We might call this the “bureaucratisation of debureaucratisation”.⁹

This is creating a new branch of government to reduce bureaucracy. Central government appoints “debureaucratisation commissioners”; ministries acquire “bureaucracy reduction secretariats”; independent “regulatory scrutiny councils” appear; some governments even establish “ministries of transformation”. Together, they act as inspectors of bureaucracy: they seek to stop new rules from multiplying and regularly prune the thicket of existing regulation.¹⁰

These teams use different methods according to their remit. They may tell departments drafting new laws to calculate what compliance will cost businesses. Or they may coordinate periodic

⁵ Ralph Brinkhaus: 100 Vorschläge für den Neustaat. Berlin 2024, p. 2.

⁶ On expert commissions, see Sven T. Siefken: Expertenkommissionen der Bundesregierung. In: Svenja Falk et al. (eds.): Handbuch Politikberatung. Wiesbaden 2019, pp. 145–161.

⁷ Commissions are normally named after their chairs: the “Waffenschmidt Commission”, the “Schlichter Commission”, the “Mandelkern Commission”, the “Fuchs Commission”, the “Henzler Commission”, the “Stoiber Commission” or the “Voßkuhle Commission”. Since apparently only men chair debureaucratisation commissions, one might assume, at least for male politicians, that they should not merely plant a tree, build a house and father a child once in their lives, but also chair a debureaucratisation commission.

⁸ Debureaucratisation through commissions has become institutionalised to the point that it causes consternation if no commission is currently drawing up its catalogue of demands for bureaucracy reduction. Christopher Wilkes: Institutionalisierung der Entbürokratisierung. Zur Fortsetzung der Rechts- und Verwaltungsvereinfachung in Bund und Ländern. In: Die Verwaltung 22 (1989), pp. 333–351. See also Pascale Cancik: Zuviel Staat? – Die Institutionalisierung der „Bürokratie“-Kritik im 20. Jahrhundert. In: Der Staat 56 (2017), pp. 1–38, here p. 24. The work of the “Society for the Promotion of Debureaucratisation” in the Federal Republic of Germany has not yet been comprehensively studied.

⁹ Michael Küppers refers to a motion by the CDU/CSU parliamentary group dated 1 July 2003, Bundestag printed paper 15/1330, which, in discussing the work of the commissions, noted a lack of “systematic, long-term and therefore effective measures and instruments for dismantling bureaucracy”. See Michel Küppers: Mehr Bürokratie wagen. In: Merkur 79 (2025), no. 4, pp. 83–92, here p. 85.

¹⁰ Andre Wilkens: Der diskrete Charme der Bürokratie. Gute Nachrichten aus Europa. Frankfurt am Main 2017, p. 30.

“bureaucracy clear-out acts”, collecting proposals from ministries and agencies to ease obligations to supply evidence, file reports or keep records.

Above all, the new bureaucracy for cutting bureaucracy likes numbers. Even specialists struggle to decide whether a particular rule makes sense, so they measure what they can. At the simplest level, they count laws, regulations or pages of legislation, then demand that the totals fall within a year. More elaborate methods put a monetary price on compliance. But however sophisticated the calculation looks, the underlying belief is much the same: numbers can steer political action.

Specialist offices also produce specialist staff. Whenever ministers draft legislation, someone must estimate its bureaucratic costs. Ministries and scrutiny councils therefore recruit people trained to calculate them. The hope is that this new breed of “debureaucratisation bureaucrat” can do better than administrative generalists at reducing bureaucracy.¹¹

Debureaucratisation also comes wrapped in management language. Reformers urge public servants to replace “distrust” with “confidence” in citizens, to take sensible risks rather than fear mistakes, and to follow the purpose of a rule rather than just its wording. They call on legislators and administrators to change their thinking, adopt a “new mindset” and empower citizens rather than harass them. Leaders, they say, should foster personal responsibility, decisiveness and a willingness to take risks.¹²¹³¹⁴

Behind the familiar promises of a “culture of trust”, a “focus on transformation” and an “enabling attitude” lies a catalogue of concrete measures. Each tells officials what to do when they draft a law, review a rule or manage staff. In other words, attempts to promote flexibility often take the form of new ‘if-then’ requirements.

For the people who keep public administration running, these initiatives usually mean another disruption. Even with senior leaders behind them, new requirements to cut bureaucracy can get in the way of providing services. Staff in ministries, regional agencies and local councils have long learned how to work around procedural demands. They apply the same ingenuity to rules intended to reduce bureaucracy as they do to environmental, equality, workplace-safety and anti-corruption requirements that might otherwise slow their work.

Which bureaucracy-cutting measures attract broad support? How are they meant to work—and what problems do they create?

¹¹ For an insightful account of the tension between generalists and specialists in public administration, see Werner Jann, Kai Wegrich: Generalists and Specialists in Executive Politics. Why Ambitious Meta-policies so Often Fail. In: Public Administration 97 (2019), pp. 845–860.

¹² Nathalie Behnke, Jonas Bernhard: Kulturelle Ursachen der Überbürokratisierung. Munich 2025, p. 43.

¹³ W. Kluth: Bürokratiefilter für den Gesetzgeber (see note 4), p. 59. The quotations cited here come from studies commissioned by the “Stiftung Familienunternehmen” (Foundation for Family Businesses), a lobbying organisation for large family businesses that, under the banner of bureaucracy reduction, advocates rolling back state regulation in labour, social, environmental, health and financial policy. For a critical account of the “Stiftung Familienunternehmen”, see the detailed report by the opposing lobby group Greenpeace: Katharina Heider, Bastian Neuwirth, Mauricio Vargas: Der Club der Superreichen. Das geheime Netzwerk der Stiftung Familienunternehmen und wie sie gegen Klimaschutz und Steuergerechtigkeit agiert. Hamburg 2025.

¹⁴ Gisela Meister-Scheufelen: Wenn Bürokratie zum Geschäftsmodell wird. In: Behördenspiegel Newsletter Verteidigung, Streitkräfte, Wehrtechnik (2025), no. 12, p. 3, here p. 3.

1. Playing Games with the Cost of Compliance

One popular approach asks businesses, hospitals, universities and schools to put a figure on the effort they spend meeting legal requirements. Legislators must estimate, in dollars, euros, roubles, yen or rupees, what complying with a proposed law will cost. Add up these estimates across all regulations, the argument runs, and you get a national total for bureaucratic compliance. You can then build an index to track whether the burden on businesses rises or falls.¹⁵

Some critics go further: once we know what compliance costs, why not make the state reimburse businesses for reporting requirements in environmental protection, labour law or social policy? A company seeking permission to build a warehouse would pay a fee but could then ask the public authority to cover its paperwork costs. If officials wanted figures on slurry spread across fields, workplace accidents or employees with disabilities, taxpayers would pay for gathering them.¹⁶

Complex calculations give an impression of objectivity. In practice, they leave plenty of room for interpretation. Companies can seldom do more than estimate what compliance would cost under better- or worse-organised procedures. Depending on what someone wants to show, the resulting figures can be pushed up or down.¹⁷

A skilled head of division knows how to present figures that will help a proposal advance—or quietly stall it. The publicised cost of a new law therefore does not emerge from a neutral calculation. Ministry divisions, central units and interest groups negotiate it. And all the coordination needed to arrive at a figure adds another layer of complexity and delay to lawmaking.

2. How Practical Checks Slow Down Lawmaking

A law works only if the agencies responsible can put it into practice. Reformers therefore argue that legislators should not wait until a law takes effect to find out whether it works. They should test it while drafting it. In this scenario national lawmakers would work closely with regional authorities, which could investigate likely difficulties and flag gaps before the law is passed.¹⁸

Advocates argue that legislators often overlook practical problems, lack confidence in workable solutions and fail to anticipate consequences. They therefore want practical checks to show

¹⁵ The requirement to determine the costs for the administrative units involved when introducing new laws is considerably older. In the Federal Republic, a law requiring this already existed in the late 1950s. Friedrich von Dungen: *Bürokraten oder schöpferische Beamte?* Göttingen 1960, p. 24.

¹⁶ This idea is advanced, for example, by Rolf Kroker, Karl Lichtblau, Klaus-Heiner Röhl: *Abbau von Bürokratie in Deutschland. Mehr als die Abschaffung von Einzelschriften.* Cologne 2004, p. 124; Justus Haucap, Christiane Kehder, Ina Loebert: *Bürokratie und ihre Folgen für die Wirtschaft in Deutschland. Ein Gutachten im Auftrag der Initiative Neue Soziale Marktwirtschaft ("INSM").* Düsseldorf 2023, pp. 6 and 27. The emergence of this idea of cost reimbursement and politicians' response to it have not yet been studied.

¹⁷ See Frank Frick, H. Brinkmann, T. Ernst: *Das Standard-Kosten-Modell. Ein neuer Ansatz für effektiven Bürokratieabbau.* In: *Zeitschrift für Gesetzgebung* 21 (2006), pp. 28–43.

¹⁸ See the statement by Konrad Kruis, then a senior official in the Bavarian State Chancellery and later a judge of the Federal Constitutional Court, in Bundesminister des Innern (ed.): *Sachverständigenanhörung zu Ursachen einer Bürokratisierung in der öffentlichen Verwaltung sowie zu ausgewählten Vorhaben zur Verbesserung der Verhältnisse von Bürger und Verwaltung am 19. und 20. Juni in Bonn. Teil A – Zusammenstellung der schriftlichen Stellungnahmen der Sachverständigen.* Bonn 1980, p. 231. For a summary, see Renate Mayntz: *Gesetzgebung und Bürokratisierung. Wissenschaftliche Auswertung der Anhörung zu Ursachen einer Bürokratisierung in der öffentlichen Verwaltung.* Cologne 1980, p. 96.

whether agencies can apply a new law smoothly. To make sure lawmakers pay attention, draft bills would have to explain how tests in subordinate agencies and local councils shaped the proposal or why legislators ignored their findings. In this view, practical checks gain influence only when the drafting process formally requires them.¹⁹²⁰

Trials in local councils, tests of proposed digital procedures and early advice from different experts can certainly make laws easier to apply. Yet they also add steps to the process and slow it down. There is an irony here: reformers sometimes demand fewer opportunities to object during approval procedures to speed decisions up, while also calling for more tests and consultation before legislation passes.

Nor does running a practical check guarantee that lawmakers will listen. Parliament may disregard findings when members suspect - sometimes with good reason - that opponents are using the tests to derail a proposal. It would be naïve to expect evaluations, practical checks and real-world laboratories to sway political decisions simply because they produce evidence. Their findings tend to enter the debate when they serve someone's political position.²¹²²

Politicians often compare lawmaking to sausage-making: better not to watch either being done. The saying is variously credited to Nicolas Chamfort, John Godfrey Saxe, Claudius O. Johnson and Otto von Bismarck. Its point is that laws rarely emerge from a cool search for the most rational answer. Competing interests, shifting moods and chance shape the outcome. This is no reason to abandon practical tests of whether laws can work through digital administrative systems. But such tests will matter only when their advocates understand how to use them amid the political manoeuvring that shapes legislation.

¹⁹ Staronova, Katarina (2010): Regulatory Impact Assessment. Formal Institutionalization and Practice. In: Journal of Public Policy 30, pp. 117–136. See also Stefan Kühl: Wenn der alte Wein besser schmeckt. Die vergessenen Einsichten einer Diskussion vor fünfzig Jahren zu Praxis-Checks in der Gesetzgebung. 2025. Available online at: <https://verfassungsblog.de/buerokratieabbau-praxis-checks-gesetzgebung/>.

²⁰ These demands are found not only in the position papers of the "Initiative für einen handlungsfähigen Staat" (Initiative for a Capable State), in coalition agreements driven by "Verantwortung für Deutschland" (Responsibility for Germany), or in the "Modernisation Agenda for State and Administration" of a ministry for cutting bureaucracy. They had already been advanced almost fifty years ago at an "expert hearing" on the causes of "bureaucratisation in public administration". In the final phase of the Social Democratic–Liberal coalition, the then Interior Minister Gerhard Baum brought together the crème de la crème of German constitutional lawyers, public administration scholars and organisational sociologists to discuss the possibilities for reducing bureaucracy. The findings of this reform initiative are largely forgotten today. See Hellmut Wollmann, then a public administration scholar at the Free University of Berlin, in Bundesminister des Innern: Sachverständigenanhörung zu Ursachen einer Bürokratisierung in der öffentlichen Verwaltung sowie zu ausgewählten Vorhaben zur Verbesserung der Verhältnisse von Bürger und Verwaltung am 19. und 20. Juni in Bonn (see note 18), p. 303. See also the incorporation [editorial comment in the source: "What do you mean by incorporation?"] in R. Mayntz: Gesetzgebung und Bürokratisierung (see note 18), p. 113.

²¹ Already fifty years ago, a proposed amendment to the Construction Statistics Act, tested in a pilot project in Stuttgart, was found to increase the administrative workload sevenfold. The results of the practical implementation check were nevertheless disregarded during parliamentary deliberations. See Konrad Kruis's account in the verbatim record of the hearing, Bundesminister des Innern (ed.): Sachverständigenanhörung zu Ursachen einer Bürokratisierung in der öffentlichen Verwaltung sowie zu ausgewählten Vorhaben zur Verbesserung der Verhältnisse von Bürger und Verwaltung am 19. und 20. Juni in Bonn. Teil B – Stenographisches Wortprotokoll. Bonn 1980, p. 166.

²² See also the early research by Hans-Ulrich Derlien: Die Erfolgskontrolle staatlicher Planung. Baden-Baden 1976. See also R. Mayntz: Gesetzgebung und Bürokratisierung (see note 18), p. 120.

3. How Sunset Clauses Reopen Old Conflicts

Another proposal suggests giving laws, regulations and funding programmes an expiry date. Supporters of “sunset legislation” argue that a deadline forces governments to review whether a rule still serves a purpose and decide whether to renew, change or drop it. In theory, this would clear away ineffective regulations, make the law easier to understand and lower administrative costs.²³²⁴²⁵

In practice, expiry dates reopen battles over laws that have already passed. Opponents organise to defeat a rule before the deadline, while supporters try to frame the review so that renewing it seems the natural choice.

The hope that expiry dates would put debureaucratisation on “autopilot” has proved naïve. Instead, they make regulatory disputes recur more often. Ministries and parliaments already have crowded agendas, so reviews may become little more than boxes to tick - the opposite of the serious reassessment the policy was meant to encourage.²⁶²⁷

4. Repeal One Old Rule for Every New One

A related approach says that whenever lawmakers introduce a new requirement for businesses, universities, schools or associations, they must repeal an existing one. This “one-in, one-out” rule is meant to stem the flood of regulation.²⁸

Once governments adopt the rule, ministries spend considerable time hunting for laws they can sacrifice. They may repeal an allowance for holders of the highest First World War military honours because no beneficiaries remain. Or they may scrap a hard-coal subsidy law long after coal mining has ceased. Cleaning up such provisions does no harm. But it offers no real relief from bureaucracy as the rules had already stopped mattering.²⁹³⁰

²³ For a detailed discussion, see Sofia Ranchordás: Constitutional Sunsets and Experimental Legislation. A Comparative Perspective. Cheltenham 2014. See also Bastian Jantz, Sylvia Veit: Entbürokratisierung und bessere Rechtssetzung. In: Bernhard Blanke et al. (eds.): Handbuch der Verwaltungsreform. Wiesbaden 2011, pp. 126–135.

²⁴ For an early analysis, see R. Mayntz: Gesetzgebung und Bürokratisierung (see note 18), pp. 114–115.

²⁵ See, for example, Andreas Freytag, Sebastian Schuhmann: Bürokratieabbau durch Sunset-Legislation. In: ORDO 72 (2023), pp. 441–469, here p. 441. See also J. Haucap, C. Kehder, I. Loebert: Bürokratie und ihre Folgen für die Wirtschaft in Deutschland (see note 16), pp. 29–30.

²⁶ Werner Jann, Kai Wegrich, Jan Tiessen: “Bürokratisierung” und Bürokratieabbau im internationalen Vergleich – wo steht Deutschland? Berlin 2007, p. 56.

²⁷ R. Mayntz: Gesetzgebung und Bürokratisierung (see note 18), p. 115.

²⁸ W. Jann, K. Wegrich, J. Tiessen: “Bürokratisierung” und Bürokratieabbau im internationalen Vergleich – wo steht Deutschland? (see note 26), p. 55.

²⁹ For these examples, see Nicolai Dose: Weshalb Bürokratieabbau auf Dauer erfolglos ist, und was man trotzdem tun kann. In: dms – der moderne staat – Zeitschrift für Public Policy, Recht und Management (2008), pp. 99–120, here p. 105.

³⁰ Hans Peter Bull: Bürokratieentlastung – was ist gemeint und was ist machbar? In: Verwaltung & Management 30 (2024), no. 2, pp. 51–62, here p. 59.

5. How Administrations Work Around Staffing Cuts

The simplest proposal is to cut the number of people working in public administrations. Depending on how radical the reformers are, they may demand that ministries, agencies or councils shed 10%, 20% or even 50% of their staff. They assume that bureaucracies keep expanding their workforce regardless of how much work they actually need to do.³¹

Cutting staff is meant to achieve more than savings on salaries. Advocates expect it to cut regulation too: with fewer civil servants, ministries would struggle to draft new rules; environmental agencies would inspect businesses less; and tax authorities would impose fewer reporting duties.

But ministries still have work to do. When leaders demand staff cuts without reducing that workload, ministries move people or tasks elsewhere. They may transfer responsibilities to subordinate agencies or outsource them to project-management organisations set up under private law. These associations, federations and companies may still draw on tax revenues, but their employees no longer appear in official public-sector staffing totals.

Some ministries consequently rely on a “grey army” of people who carry ministry business cards but draw salaries from outside bodies. Whether staff outside the formal chain of command should draft laws or manage international coordination offices is debatable. But the government can report to the Chancellor that the ministry has cut its headcount.

6. Why Bureaucracy and Efforts to Cut It Grow Together

Politicians often measure success by how many laws they pass during a term in office. A newly appointed minister might point to the pile of laws and regulations prepared under their predecessor and promise to achieve even more. The same incentive spreads through the ministry: officials advance their careers by producing legislation. For ministers and departmental leaders alike, more rules become evidence that they have been effective.³²³³

The attraction of using bureaucracy to fight bureaucracy is that it lets politicians show they are doing something—by passing still more laws and regulations. When demands to cut red tape grow louder, a ministry can issue a regulation on bureaucracy reduction or pass a bureaucracy relief act. That, too, gives a minister another legislative achievement to claim.³⁴

³¹ The classic reference is, of course, Cyril Northcote Parkinson: *Parkinson's Law and Other Studies in Administration*. Boston 1957. In the public choice tradition, see William A. Niskanen: *Bureaucracy and Representative Government*. Chicago 1971.

³² See Thomas Romer, Howard Rosenthal: *Political Resource Allocation, Controlled Agendas, and the Status Quo*. In: *Public Choice* 33 (1978), pp. 27–43, here pp. 39–40; see also Gabriele Gratton et al.: *From Weber to Kafka*. In: *The American Economic Review* 111 (2021), pp. 2964–3003, here pp. 2967–2968.

³³ On this mechanism, see Erwin K. Scheuch: *Die Selbsttäuschung der Bürokratie*. In: Heiner Geißler (ed.): *Verwaltete Bürger – Gesellschaft in Fesseln. Bürokratisierung und ihre Folgen für Staat, Wirtschaft und Gesellschaft*. Frankfurt am Main, Berlin, Vienna 1978, pp. 157–189, here p. 175; Markus Hinterleitner: *Blaming Bureaucracy. Reckoning with a Problematic Political Activity*. Oxford 2025, p. 75.

³⁴ The abbreviated title “Bureaucracy Relief Act” for the “Act to Relieve Citizens, Businesses and Public Administration of Bureaucracy” really does exist. The “Bureaucracy Reduction Implementing Regulation” (BüAbbaDuVau) is a satirical invention by Dieter Schumacher, who considers bureaucracy reduction impossible without “a comprehensible and implementable regulation” governing it. Dieter Schumacher: *Die Käfighaltung des Menschen. Eine Philosophie der Bürokratie*. Norderstedt 2017, p. 239.

Political attacks on bureaucracy have become a wearying contest to outbid the competition. One politician demands that lawmakers scrap an old law for every new one; another calls for two or three repeals. One party proposes cutting ministry staff by 10%; its rival calls for 15%. One party wants to abolish dozens of agencies; another draws up a list of hundreds.

The louder these promises become, the more the state's bureaucracy can continue to expand. Politicians may denounce bureaucracy almost as an ideology while government structures grow around them. Parliament might establish a debureaucratisation commissioner, a reduction secretariat or a scrutiny council in the same week that legislators consider tighter rules on assisted dying, food-safety enforcement or smoking in public places.³⁵³⁶

Organisational researchers describe this as an inverse relationship between “talk” and “action”: the less an organisation achieves an objective, the more loudly it proclaims its commitment to it. The worse conditions become, the grander the promises of paradise. As countries miss carbon-emissions targets, they announce more ambitious ones. And the more a minister demonstrates activity by passing laws, the more forcefully that minister may condemn excessive bureaucracy.³⁷

There is a final irony. Politicians criticise bureaucrats for enforcing laws that politicians themselves have passed. As Pascale Cancik argues, attacking bureaucracy can shield politicians from criticism. By pointing to a few familiar examples of red tape, they portray themselves as champions of restraint while continuing to pursue their own regulatory agendas. Complain loudly enough about bureaucrats and people may fail to notice that you have just passed another law that adds to their workload.³⁸³⁹

³⁵ For the example of the Nazi state, see Franz Neumann: *Behemoth. Struktur und Praxis des Nationalsozialismus 1933–1944*. Frankfurt am Main 2004, p. 111.

³⁶ These examples come from the week in which the regulatory scrutiny council was established in the Federal Republic of Germany. See W. Jann, K. Wegrich, J. Tiessen: “Bürokratisierung” und Bürokratieabbau im internationalen Vergleich – wo steht Deutschland? (see note 26), p. 42.

³⁷ Nils Brunsson: *Organized Hypocrisy*. In: idem (ed.): *The Consequences of Decision-Making*. Oxford, New York 2007, pp. 111–134.

³⁸ See P. Cancik: *Zuviel Staat?* (see note 8), p. 34; eadem: *Die EU als Bürokratie der Anderen – zur Semantik gegenwärtiger EU-Kritik*. In: Günter Blamberger et al. (eds.): *Vom Umgang mit Fakten. Antworten aus Natur-, Sozial- und Geisteswissenschaften*. Paderborn, Germany 2018, pp. 151–163, here p. 156; eadem: “Bürokratie-Pathologie”? In: *Deutsches Verwaltungsblatt* 140 (2025), pp. 1189–1196, here p. 1191.

³⁹ I am paraphrasing Wolfgang Janisch here: *Bürokratieabbau – Warum dauert das so lange?* In: *Süddeutsche Zeitung* (23 October 2023). His wording is: “If you talk about reducing bureaucracy often enough, it is less noticeable when you introduce a few more complicated regulations.”