METHODOLOGY DOCUMENT

Regulatory Friction Index

RFI

A framework for quantifying the daily burden regulation places on people.

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Version	1.0 — Draft
Status	Working Paper
Date	April 2026

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1. Introduction

1.1 Motivation

Existing policy evaluation frameworks assess regulations through two primary lenses: economic cost and policy effectiveness. A regulation is deemed acceptable if its benefits outweigh its financial costs and it achieves its stated objectives.

This framework omits a third, systematically ignored dimension: the lived friction imposed on people through everyday interactions with regulated products, processes, and systems.

The intuition behind the Regulatory Friction Index emerged from a simple observation: the EU's requirement for tethered bottle caps (Single-Use Plastics Directive, 2019) is, per interaction, a trivially minor inconvenience. Yet multiplied across hundreds of millions of citizens performing this interaction hundreds of times per year, the aggregate friction footprint is substantial — and entirely invisible to conventional impact assessment.

The RFI is not an argument against regulation. It introduces a third variable alongside effectiveness and economic cost: the friction cost borne by people in their daily interactions with regulated products, processes and systems.

1.2 What the RFI Measures

The Regulatory Friction Index (RFI) measures the resistance introduced by a regulation into people's everyday lawful actions, expressed across five friction dimensions and weighted by the frequency and scale of exposure. People encounter regulations both in private life (as consumers, residents, travellers) and in professional life (as workers, managers, compliance officers); the RFI captures friction in both contexts.

It produces two complementary scores for each regulation assessed:

- Individual Regulatory Friction (IRF) — the burden on each affected person per interaction
- General Regulatory Friction (GRF) — the aggregate societal burden, combining intensity with exposure

1.3 Scope

The RFI is designed for application to regulations at any level of jurisdiction — supranational (e.g. EU), national, regional or local — and across any country or legal system. It is applicable wherever a regulation imposes requirements that create friction for individual people, whether encountered in private life or in a professional capacity. Specific use cases include:

- Product design and labelling requirements
- Digital and administrative compliance requirements
- Environmental and waste management obligations
- Rights-based and voluntary regulatory mechanisms

It is not designed to replace existing methodologies for measuring the aggregate economic cost of regulation or compliance burdens on organisations. Those frameworks address different questions and are complementary to the RFI. The RFI measures friction at the level of the individual person: a compliance officer preparing a regulatory filing, an accountant compiling a statutory audit, and a consumer navigating a cookie banner are all people experiencing friction, and the index treats them equivalently.

1.4 The RFI and Better Regulation

A common objection to new analytical frameworks is that they impose additional requirements on the regulatory process, thereby slowing or complicating the approval of legislation. The RFI is designed to avoid this. It is not a veto mechanism and does not create a new procedural gate. It adds rigour to a judgment that regulators already make informally — the judgment about how burdensome a regulation will be to those subject to it — and provides a structured basis for making that judgment consistently and accountably.

Five properties of the framework support this position.

- It makes explicit what was already implicit. Friction is currently assessed informally, inconsistently, and without accountability. The RFI does not introduce a new consideration — it disciplines one that was already present in regulatory decision-making but had no agreed methodology.
- It is oriented toward redesign, not rejection. A high friction score does not block a regulation from proceeding. It prompts the question of whether the same policy objective can be achieved with less burden on people. This is precisely the question that better regulation frameworks exist to ask, and the RFI gives it a quantitative basis.
- It reduces assessment costs over time. A standardised rubric applied consistently across regulations builds a reusable dataset. Once a regulation type has been scored, those scores inform future assessments of comparable instruments. The marginal cost of each additional assessment falls as reference points accumulate. This is the opposite of bureaucratic overhead: it is institutional learning.
- It strengthens the case for well-designed regulation. Regulations with low IRF and low GRF scores receive an affirmative signal: they impose minimal burden and are working cleanly. The RFI provides evidence that can be used to defend regulation against friction-based repeal arguments. Opponents of regulation already make such arguments rhetorically; the index allows defenders to rebut them with data.
- It is proportionate by design. The RFI adds a third variable alongside economic cost and policy effectiveness — it does not replace either. A regulation may score high on the RFI and remain entirely justified if its benefits are sufficient. The index informs trade-offs; it does not determine outcomes.

The RFI does not add a new requirement to regulation. It adds rigour to a judgment regulators were already making informally, and turns it from an unexamined assumption into a resource for better design.

2. Conceptual Framework

2.1 Definition

Regulatory Friction Index (RFI): A measure of the cumulative resistance that a regulation imposes on people performing normal daily activities — in private life or in a professional capacity — across five dimensions: physical effort, time cost, cognitive load, autonomy reduction, and avoidability, weighted by the frequency and scale of exposure.

2.2 The Friction-Exposure Structure

The RFI is built on a fundamental distinction between two types of regulatory cost:

Concept	Definition	Captures
Friction Intensity	How burdensome is each interaction with this regulation?	Per-person, per-interaction experience
Exposure	How many people encounter this regulation, how often?	Population scale and interaction frequency
RFI (GRF)	The product of intensity and exposure — aggregate societal friction	Systemic impact invisible to per-interaction analysis

This structure makes visible a class of regulations that conventional analysis systematically underestimates: those with low per-interaction friction but very high exposure. A regulation that imposes two seconds of inconvenience on 400 million people, 200 times per year, generates an enormous aggregate friction footprint — even though no individual interaction is noteworthy.

2.3 The IRF/GRF Policy Matrix

The two scores — IRF and GRF — together define a four-quadrant policy matrix with distinct implications for each type of regulation:

	High GRF	Low GRF
High IRF	**Redesign urgently.** Both individual experience and societal aggregate are poor. Highest policy priority.	**Investigation warranted.** High per-citizen burden but low uptake — warrants investigation into whether friction, low latent demand, or both explain the gap.
Low IRF	**Monitor closely.** Tolerable individually but large aggregate footprint. Classic invisible systemic friction.	**Generally acceptable.** Low individual burden and low aggregate impact. Regulation is working cleanly.

3. Methodology

3.1 The Five Friction Dimensions

Each regulation is scored on five dimensions, each rated 0–5. The dimensions are designed to be orthogonal — each captures something the others do not.

Dimension	Definition	Score 0	Score 5
Physical Effort	Extra bodily actions required to comply with the regulation	No additional physical action required	Significant physical effort, manipulation or repeated action required
Time Cost	Additional time added per interaction as a direct result of the regulation	No measurable time added	Adds many minutes per interaction
Cognitive Load	Attention, decision-making or confusion introduced by the regulation	No additional mental effort required	High complexity: rules are ambiguous, require research or produce decision fatigue
Autonomy Reduction	The degree to which the regulation narrows the individual's choice of how to perform an action	No reduction in available choices	Preferred behaviour fully prohibited; no alternative path exists
Avoidability	The degree to which the person cannot opt out or route around the friction	Fully avoidable — person can completely opt out	Completely unavoidable for any person engaging in the relevant activity

The maximum possible friction score is 25 (5 × 5 dimensions).

3.2 Normalised Friction Score (IRF)

The Individual Regulatory Friction score is derived by normalising the raw friction score against the theoretical maximum:

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IRF = Σ (friction dimension scores) / 25
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IRF ranges from 0 to 1, where 1 represents the maximum conceivable friction intensity per interaction.

3.3 Exposure

Exposure quantifies the scale at which friction is experienced across the population of people who encounter the regulation. It comprises two components:

Variable	Symbol	Definition	Data Source
Reach	R	Number of people who actually encounter the friction at the point of interaction, within the assessed jurisdiction	Census data, legal scope, market data

Frequency	F	Number of interactions per person per year	Consumption data, survey data, usage statistics

> **Exposure = R × F**

Exposure is normalised against a theoretical maximum anchor:

- R_{max} = the adult population of the assessed jurisdiction (e.g. 370 million for EU-level assessments; scaled appropriately for national or sub-national applications)
- F_{max} = 1,500 interactions per person per year (approximately 4 interactions per day — the practical upper bound for any regulation encountered by an individual person in private or professional life)

> **Normalised Exposure = (R × F) / (R_{max} × 1,500) capped at 1.0**

Normalised Exposure is capped at 1.0 where a regulation's raw exposure exceeds the theoretical maximum.

3.4 The RFI Formula

The General Regulatory Friction score (GRF) combines normalised friction intensity and normalised exposure as a geometric mean:

> **GRF = √(IRF × Normalised Exposure)**

The geometric mean (square root of the product) is used rather than a weighted average for three reasons:

- It preserves the multiplier relationship: a regulation with zero friction always scores zero regardless of exposure, and vice versa
- It avoids the compression problem of simple multiplication of two sub-1 decimals
- It is a well-established method for combining indices of different scales, with precedents in composite indicators such as the Human Development Index

3.5 Duration Classification

Duration is recorded as a metadata tag rather than incorporated into the formula, for two reasons: friction is best understood as a steady-state annual cost rather than a compounding one, and most regulations across jurisdictions have no sunset clause, making duration an arbitrary assumption.

Tag	Definition
Temporary	Defined end date
Periodic	Subject to mandatory review at defined intervals
⚠ **Permanent**	No sunset clause; indefinite application

Where a regulation is classified as Permanent with a high GRF score, the index recommends consideration of a sunset clause or mandatory review mechanism as a policy response.

4. The Deterrence Flag

4.1 Rationale

For voluntary or rights-based regulations, low exposure does not necessarily reflect low citizen need. In some cases, it may reflect that friction is suppressing uptake — but it may equally reflect that citizens simply do not have sufficient latent demand to exercise the right, regardless of how frictionless the process might be. The RFI cannot definitively distinguish between these two explanations with the data currently available.

The deterrence flag is therefore designed as a screening signal, not a causal finding. It identifies regulations where the gap between awareness and uptake is large enough to warrant further investigation — but it does not claim to prove that friction is the cause. Establishing causation requires additional demand-side data, which the index flags as a priority for future development.

4.2 The Deterrence Ratio

The Deterrence Ratio (DR) is a screening metric that identifies regulations where the gap between citizen awareness and actual uptake is large enough to warrant further investigation. It compares citizen awareness of a right against actual uptake:

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DR = Awareness Rate / Uptake Rate
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DR Value	Interpretation	Implication
< 5	Low need	Awareness and uptake are broadly proportionate; gap does not warrant further investigation
5 – 20	Gap warrants investigation; friction may or may not be a contributing factor	Weak flag (⚠ D?) applied; further investigation recommended
> 20	Large gap; friction as a contributing factor cannot be ruled out	Full investigation flag (⚠ D) applied; demand-side data recommended to determine cause

4.3 Flag Conditions

The deterrence flag (⚠ D) is applied when all four conditions are satisfied simultaneously:

#	Condition	Purpose
1	**IRF > 0.50**	Friction intensity is genuinely high per interaction
2	**GRF < 0.10**	Aggregate exposure is low relative to friction intensity
3	**Regulation is voluntary or rights-based**	Ensures low exposure is not explained by mandatory scope limitation

4	**Deterrence Ratio > 20**	Provides a quantitative screen identifying regulations where the awareness-uptake gap is large enough to warrant investigation; does not establish friction as the cause

Where the investigation flag fires, the RFI does not conclude that friction is the cause of low uptake. It signals that the awareness-uptake gap is large enough to justify demand-side research — for example, citizen surveys on latent demand — before drawing policy conclusions. The cause may be friction, low latent demand, or a combination of both.

5. Scoring Rubric

To ensure consistency across assessors and over time, each friction dimension is anchored with reference examples at key score points. Where possible, scores are tied to observable proxies — measurable indicators that can be verified by direct observation, product testing, or documented regulatory text — rather than relying solely on assessor judgment. The five dimensions differ in how readily they can be objectively measured. Physical Effort and Time Cost are the most tractable: effort can be operationalised by counting discrete motor actions, and time can be measured directly or estimated from product testing and behavioural studies. Cognitive Load, Autonomy Reduction, and Avoidability are less directly observable and currently rely on structured expert assessment against the anchors below. Two methodological improvements are flagged for future development: a formal separation of dimensions by measurability tier, with distinct evidential standards for each (see §8.2); and the grounding of softer-tier scores in survey data from affected people rather than expert judgment (see §8.2). Until that data infrastructure exists, the rubric below provides the primary consistency mechanism.

5.1 Physical Effort

Score	Description and Example
0	No additional physical action whatsoever. Observable proxy: no motor action added beyond pre-regulation behaviour. For example, a product labelling requirement — the person reads only, no action required.
1	Trivial additional action, performed without conscious effort: one simple discrete motor action added (e.g. pressing a button to accept a prompt)
2	Minor but perceptible physical adjustment: 2–3 discrete motor actions, or one action requiring non-trivial coordination (e.g. tethered bottle cap — hold cap, angle bottle, drink around attachment)
3	Noticeable effort: 4-6 discrete actions, or repeated physical decision-making per interaction; some people may find it uncomfortable. For example, household waste sorting across 4+ bins — identify material, locate correct bin, separate components if needed. In a professional context: preparing and physically separating multiple document sets per filing.
4	Significant effort: more than 6 discrete actions, or a sequence requiring sustained physical manipulation across multiple sub-tasks (e.g. airport security liquid removal — unpack bag, remove liquids bag, separate, repack)
5	Substantial physical demand affecting all people regardless of physical capacity; requires travel to a location or sustained physical exertion. For example, mandatory in-person registration requiring travel to a government office. In a professional context: mandatory physical attendance at a regulatory hearing or inspection site.

5.2 Time Cost

Score	Description and Example
0	No measurable time added. For example, a recyclable packaging label — the person reads passively.
1	Under 3 seconds added per interaction. For example, tethered bottle cap — ~1-2 seconds. In a professional context: a pre-populated mandatory digital field or single-click confirmation.

2	3-15 seconds per interaction. For example, a cookie consent banner — 5-10 seconds per site. In a professional context: a single mandatory disclosure field or checkbox requiring active input.
3	15 seconds to 2 minutes per interaction. For example, a waste sorting decision for an ambiguous item. In a professional context: completing a short mandatory disclosure section with readily available data.
4	2-10 minutes per interaction. For example, the airport liquid removal and security process. In a professional context: completing a standard regulatory return with data that must be actively retrieved.
5	Over 10 minutes per interaction; or hours in aggregate per year. For example, a GDPR erasure request across multiple platforms. In a professional context: preparing a section of an annual compliance report or statutory audit.

5.3 Cognitive Load

Score	Description and Example
0	No mental effort required; the person acts automatically. Observable proxy: required behaviour is identical to pre-regulation behaviour, or a single unambiguous condition fully habituated by the affected population. For example, a regulatory change already fully habituated by the affected population.
1	Minor attention required; rules clear and quickly internalised. Observable proxy: one unambiguous compliance condition, no exceptions, uniform across all contexts and jurisdictions. For example, the tethered bottle cap after initial adaptation. In a professional context: a single-condition reporting requirement with a standardised format.
2	Some attention required; rules clear but require active recall at each interaction. Observable proxy: 2-4 unambiguous compliance conditions, all uniform across contexts. For example, basic waste sorting with clear labelling. In a professional context: a straightforward single-jurisdiction reporting requirement with a fixed format.
3	Noticeable cognitive effort; rules vary by context, include exceptions, or require active interpretation at each interaction. Observable proxy: compliance conditions vary by product type, location, user category, or organisation size; or interface design actively obscures the compliant option. For example, cookie consent banners with dark patterns. In a professional context: a regulation with exemptions or sector-specific carve-outs that must be self-assessed per reporting cycle.
4	High mental load; rules are complex, ambiguous, or frequently changing. Observable proxy: 5 or more compliance conditions; or rules differ across jurisdictions; or regulatory text requires interpretation of undefined terms. For example, waste sorting for composite or unlabelled materials. In a professional context: a regulation subject to divergent national implementation or undefined terms requiring legal interpretation.
5	Very high complexity; correct compliance cannot be determined without external research, legal knowledge, or professional assistance. Observable proxy: compliance depends on case-specific legal interpretation, multiple interacting instruments, or conditions not stated in the primary regulatory text. For example, GDPR erasure — conditions, exceptions, controller obligations, appeals process. In a professional context: a regulation requiring specialist legal or technical counsel to implement correctly.

5.4 Autonomy Reduction

Score	Description and Example

0	No reduction in available choices. Observable proxy: the full range of pre-regulation products, formats, behaviours, and methods remains legally available and commercially accessible. The person can act exactly as before.
1	Marginal reduction; a minor variant of the preferred behaviour is removed. Observable proxy: one product format or minor behavioural option is no longer available; functionally equivalent alternatives remain at similar cost and accessibility. For example, one product variant removed from market; equivalent alternatives remain readily available at comparable cost.
2	Moderate reduction; some options removed but reasonable alternatives remain at similar cost and accessibility. Observable proxy: a product category or behavioural mode is restricted but at least one comparable alternative is legally available and widely accessible. For example, cookie rejection — possible but requires additional navigation steps. In a professional context: a preferred process method restricted, but compliant alternatives available with some adjustment.
3	Significant reduction; a meaningful choice is removed with no close substitute available at comparable cost or convenience. Observable proxy: a distinct product format or behaviour is legally prohibited or no longer commercially available; alternatives require additional cost, effort, or behavioural change. For example, tethered cap — detachable cap format no longer legally sold. In a professional context: a preferred operational method prohibited; compliant alternatives require material investment or restructuring.
4	Substantial reduction; the preferred behaviour or method is prohibited and alternatives are costly or significantly inconvenient. Observable proxy: the preferred product or operational method is legally withdrawn or banned; available alternatives require meaningful additional expenditure or a change in established routine. For example, airport liquids — preferred toiletries cannot be carried; must be purchased at destination. In a professional context: a core operational process prohibited; compliance requires significant investment or restructuring.
5	Complete constraint; a single prescribed compliance method is mandated with no legal alternative. For example, no legal alternative product format or behavioural path exists within the jurisdiction. In a professional context: a single prescribed method of compliance is mandated; no discretion in implementation (e.g. a mandatory government platform with no alternative submission route). Observable proxy: a single prescribed method of compliance is mandated by law; no legal alternative exists within the jurisdiction.

5.5 Avoidability

Score	Description and Example
0	Fully avoidable with no consequence. Observable proxy: participation is explicitly voluntary under the regulatory text; no penalty, restriction, or disadvantage applies to non-participation. For example, a voluntary certification scheme; no penalty or disadvantage for non-participation.
1	Mostly avoidable with minor adjustment. Observable proxy: friction is triggered only by the person's own voluntary choice to exercise a right, use a service, or enter a specific activity; non-exercise carries no legal or material disadvantage. For example, GDPR erasure — friction arises only if the person elects to submit a request. In a professional context: a regulation that applies only if the person’s employer voluntarily enters a specific market segment.
2	Partially avoidable; avoidance is realistic for a significant portion of people but incurs some inconvenience or cost. Observable proxy: the regulated activity is optional but commonly practised; avoidance requires a modest lifestyle adjustment. For example, the regulated product or service can be substituted with moderate effort.

3	Rarely avoidable; avoidance requires a significant and sustained change that most people would not reasonably be expected to make. Observable proxy: the regulated activity is tied to a common but non-universal behaviour or professional activity; avoidance requires foregoing that activity entirely. For example, airport liquids — avoidable only by not flying. In a professional context: avoidable only by leaving a profession or exiting a market segment.
4	Practically unavoidable for any person engaging in the relevant activity. Observable proxy: the regulated product or interaction is the standard market format with no legally available unregulated alternative; avoidance requires abstaining from an everyday activity. For example, tethered caps apply to all bottled drinks sold within the jurisdiction; avoidance requires abstaining from an everyday consumption category.
5	Completely mandatory for all people within scope; no opt-out, exemption, or alternative compliance route exists. Observable proxy: the regulatory text applies universally with no size exemption, transition period, or alternative compliance pathway; encounter is automatic upon engaging in the relevant activity. For example, cookie banners apply to all internet use within the jurisdiction; waste sorting applies to all households. Encounter is automatic; no opt-out exists.

6. Pilot Dataset

The following seven regulations were assessed as a pilot dataset to validate the methodology, calibrate the scoring rubric, and stress-test the deterrence flag. They were selected to span a range of friction intensities and exposure profiles.

6.1 Scoring Summary

Regulation	PE	TC	CL	AR	AV	IRF	GRF	Flag
Cookie consent banners	1	2	3	2	5	**0.52**	**0.62**	⚠ Permanent
Tethered bottle caps	2	1	1	3	4	**0.44**	**0.49**	⚠ Permanent
Household waste sorting	3	2	3	2	5	**0.60**	**0.38**	⚠ Permanent
Airport 100ml liquids	4	4	3	4	3	**0.72**	**0.027**	⚠ Permanent
GDPR right to erasure	2	5	5	3	1	**0.64**	**0.005**	⚠ D
EU small claims procedure	3	4	5	2	1	**0.60**	**0.0015**	⚠ D?
Statutory audit requirement	2	5	4	4	1	**0.64**	**0.0008**	—

PE = Physical Effort, TC = Time Cost, CL = Cognitive Load, AR = Autonomy Reduction, AV = Avoidability. All dimension scores on 0–5 scale.

6.2 Key Findings from the Pilot Dataset

Cookie Consent Banners score highest (GRF 0.62)

Per-interaction friction is moderate, but exposure is exceptionally high. One estimate puts annual encounters at over 1,000 cookie banners per EU internet user, across a population of approximately 370 million EU internet users (the R value used in the pilot assessment; note this differs from the adult population R_max of 370 million, which is coincidentally similar in scale). The same analysis calculates aggregate hours lost in the hundreds of millions per year — a systemic cost invisible to conventional impact assessment. These figures derive from a single source and have not been independently replicated; they should be treated as indicative rather than established. The directional finding nonetheless holds: very high exposure turns moderate per-interaction friction into a significant aggregate burden.

Airport Liquids score near zero (GRF 0.027) despite very high IRF (0.72)

The 100ml liquids rule is one of the most intrusive regulations in the dataset per interaction — yet low flight frequency (approximately 3 interactions per year for frequent flyers, zero for most citizens) produces a negligible aggregate score. The RFI correctly identifies this as a significant individual burden with limited systemic impact.

GDPR Erasure triggers the deterrence flag

With 57% of EU citizens aware of the right to erasure but only approximately 2–3% ever exercising it, the Deterrence Ratio of ~25 meets the threshold for the investigation flag. However, the RFI does not conclude that friction is the primary explanation for low uptake. The gap between awareness and uptake could equally reflect low latent demand — many citizens who know the right exists may simply not feel a strong need to use it. Establishing whether friction, low demand, or a combination of both explains the gap requires demand-side survey data, which the index identifies as a priority for future research.

Statutory Audit does not trigger the deterrence flag

Despite a high IRF score (0.64) and very low GRF (0.0008), the regulation is mandatory for qualifying companies rather than voluntary. Low exposure reflects a narrow legal scope by design, not deterrence. The flag correctly stays silent.

7. Formula Summary

Component	Formula
Individual Regulatory Friction	$IRF = \Sigma(d_i) / 25$ where $d_i \in [0,5]$ for each of 5 dimensions
Normalised Exposure	$E = (R \times F) / (R_{ma}^{x} \times 1{,}500)$ where R_{ma}^{x} = adult population of assessed jurisdiction; capped at 1.0
General Regulatory Friction	$GRF = \sqrt{(IRF \times E)}$
Deterrence Ratio	DR = Awareness Rate / Uptake Rate
Investigation Flag	⚠ D if: IRF > 0.50, GRF < 0.10, voluntary/rights-based, DR > 20. Signals awareness-uptake gap warrants investigation; does not establish friction as cause
Weak Investigation Flag	⚠ D? if: above conditions met but DR is 5–20. Gap noted; investigation recommended before drawing conclusions

8. Limitations and Future Development

8.1 Current Limitations

- Frequency data (F) relies on consumption statistics, surveys and usage data which vary in quality across regulations and member states
- Friction dimension scores rely on structured expert assessment against observable proxy anchors defined in §5. Physical Effort and Time Cost are the most tractable dimensions and can be verified by direct observation or product testing. Cognitive Load, Autonomy Reduction, and Avoidability are anchored to characteristics of the regulatory text and market conditions, but retain a degree of assessor judgment that empirical validation through surveys of affected people would substantially reduce
- The index does not currently capture distributional effects — regulations may impose disproportionate friction on specific demographic groups
- The investigation flag cannot distinguish between friction-induced suppression of uptake and low latent demand. Awareness of a right does not imply a desire to use it. Resolving this requires demand-side survey data that is not currently collected systematically

8.2 Future Development Priorities

- Empirical calibration of dimension scores through structured surveys of affected people across multiple jurisdictions
- Development of a latent demand measurement methodology — through surveys of affected people or revealed preference analysis — to enable the investigation flag to distinguish between friction-induced suppression and low latent demand among the affected population
- Expansion of the pilot dataset to 50+ regulations across multiple jurisdictions and policy domains, including national and sub-national regulations

- Investigation of a distributional weighting approach to capture impacts on specific population groups, as a separate analytical layer
- Integration into regulatory impact assessment processes — at EU, national and international level — as a standard third variable alongside economic cost and policy effectiveness
- Formal tiering of dimensions by measurability: separating Physical Effort and Time Cost (directly observable, suitable for evidential standards based on measurement or product testing) from Cognitive Load, Autonomy Reduction, and Avoidability (currently assessed against structured rubric anchors, but requiring distinct evidential standards and inter-rater reliability protocols to achieve the same level of objectivity). This separation would allow the methodology to apply different evidentiary requirements to each tier and flag assessments where softer-tier scores drive the overall result
- Survey-grounded scoring for softer-tier dimensions: replacing expert judgment with scores derived from structured surveys of affected people, in which representative samples report experienced effort, confusion, and loss of choice for each regulated interaction. This would transform Cognitive Load, Autonomy Reduction, and Avoidability from assessor-assigned estimates into empirically grounded measures, substantially improving inter-assessor consistency and the methodological defensibility of the index in policy contexts

The RFI does not argue against regulation. It provides policymakers with a tool to ask: is the friction cost of this regulation justified by its benefits? And if not, how can the design be improved?

Appendix: Glossary

Term	Definition
Autonomy Reduction	The degree to which a regulation narrows individual choice of how to perform an action, independent of effort or time involved
Investigation Flag (⚠ D)	A screening signal indicating that the gap between citizen awareness of a right and actual uptake is large enough to warrant further investigation. Does not establish friction as the cause; low latent demand is an equally plausible explanation requiring demand-side research to resolve
Deterrence Ratio (DR)	A screening metric comparing citizen awareness of a right to actual uptake. A high DR signals a gap worth investigating but does not prove friction is the cause; low latent demand is an equally plausible explanation
Exposure (E)	The product of Reach (R) and Frequency (F), normalised against a theoretical maximum
Frequency (F)	The number of times per year an affected person encounters the friction introduced by a regulation
General Regulatory Friction (GRF)	The aggregate societal burden of a regulation, combining friction intensity with population-level exposure
Individual Regulatory Friction (IRF)	The burden on each affected person per interaction with a regulated product, process or system
Reach (R)	The number of people who encounter the friction introduced by a regulation within the assessed jurisdiction, derived from legal scope, census data, or market data
Regulatory Friction Index (RFI)	The overarching framework; GRF is the primary output score