



## **EAEA response to the Public consultation on the Commission's Stakeholder Consultation guidelines**

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Register Identification Number 3334854676-12

EAEA welcomes the initiative by the Commission to strengthen stakeholder consultations by developing Stakeholder Consultation Guidelines. EAEA believes that, properly implemented, the guidelines can contribute to improving and reinforcing civil dialogue between civil society and policy-makers. At the same time, EAEA wants to underline that more is still needed to reach a true civil dialogue with policy-makers.

It is essential for the quality of the consultation's answer that the timing of the consultations is carefully established. Indeed, European NGOs need sufficient time to consult with their members at the national, regional and local level in order to receive input from organisations working on the ground and give an answer that truly embraces a bottom-up approach.

It is important to establish the timeline of the consultation according to the period of the year when it is launched (summer holidays, very busy time of the year, etc.) to the length of the consultation (how much time stakeholders will need to answer it). Also, the schedule has to take into consideration how much the topic is already developed, as this will also have an impact on how much time stakeholders will need to give a valuable input to it.

Although the European Commission underlines that expert groups are not part of the consultation, we believe that this is a crucial part of transparency and participation. If transparent and clear consultation guidelines are important, it is also vital that the same rules apply to expert groups. Yet, the procedure to create the expert groups is not transparent. Expert groups often take place in an unorganized way, choosing experts from a pool of known people, in a way that often looks arbitrary, and often at the last minute. Improving the consultation guidelines must also mean improving the rigour of the expert groups guidelines, especially if it is true that expert groups' input is given more importance than wider consultations.

Furthermore, stakeholders' responses rarely receive an answer. After answering a consultation, it is often difficult for them to assess whether their arguments were listened to and had an impact and in particular, if they are the ones that influenced the process. However, it is important for stakeholders to



know whether their input was taken into consideration and had an influence on policy processes. Adequate feedback should be provided for each consultation answer sent to the European Commission. It is a crucial step for the accountability of EU Institutions.

EAEA also agrees with Social Platform and its argument that “a consultation is only a part of civil dialogue. Consultation is in fact just the second step on a scale from minus one to five that assesses the quality of civil society involvement. Step minus one is exclusion and step five is full partnership. While partnership is not always desirable, - especially for civil society that acts as a watchdog and critical voice - dialogue (step three) should always be an aim. A meaningful dialogue means that civil society is involved in all stages of a policy cycle: agenda-setting, policy definition/decision making, implementation, evaluation and reformulation. It includes EU institutions a) accountability and responsiveness, b) political will and openness to make a difference, c) transparency and clarity, d) equality and inclusiveness, e) sustainability and structures, f) recognition of the role of CSOs and g) an on-going process, with involvement at all stages of decision-making.”

If EAEA welcomes the new guidelines, it is essential to see how they are (and will be) implemented. Indeed, when significant issues, such as the Transatlantic Trade and Investment Partnership (TTIP) arise, it is not understandable from a civil society point of view that such consultation guidelines are not implemented immediately and that civil society representatives do not have the same access as industry representatives. Therefore, in order to establish a true civil dialogue, it is crucial that the scope of the guidelines is broad and is systematically implemented.

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