

Mr. Frans Timmermans
 First Vice-President of the European Commission
 Wetstraat 189
 1049 Brussels

Prot. N°. 0118/LH
 Brussels, 3rd May 2016

Dear Vice-President,

Re: Stakeholder consultation

I am contacting you on behalf of UEAPME, the European employers' organisation representing Crafts and SMEs, concerning stakeholder consultations.

Since many years we are advocating for better consultation of stakeholders and especially representative SME organisations as this is a precondition for better regulation. Consequently we have warmly welcomed and supported your proposals to consult more frequently and more effectively, at all stages of the policy-making process.

Despite important improvements in the consultation process there is a growing concern amongst our member organisations concerning the current Commission practice of stakeholder on-line consultation through - compulsory - questionnaires.

Although questionnaires can be a useful tool for some technical and targeted consultations, they are in our view not suitable to obtain the position of stakeholders. Indeed, elaborating a common position paper representing different countries, sectors and cultures cannot be achieved through a simple "ticking box" exercise but needs an intensive and careful drafting process. It allows also to express balanced positions. Unfortunately the current consultation practice does not allow to upload our position papers without being obliged to reply to the questions. Moreover the Commission states that *"only responses received through our online questionnaire will be taken into account and included in the report summarising the responses."*

Also the content of the questionnaires themselves are of growing concern of our members. Indeed the questionnaires are most of the time not fitted to be filled in by representative organisations but by individuals. The length of some questionnaires: (40, 50, 70 and even more pages) is an important burden for even simply understanding what the Commission services are looking for. Questions should also be neutral and not biased. Still too often questionnaires are also only available in English, although the European Institutions are obliged to use the national language when they address themselves to citizens. In addition the consultation time starts still too often at the moment of the publication of the English version while it should only start at the moment all language versions are available.

As we know that you are very concerned about the better regulation agenda, we hope that you will take our concerns into account. As there are other points that could be improved in the consultation process we hope we can discuss this further with you or your services in a constructive way.

Yours sincerely,



Peter Faross
 Secretary General