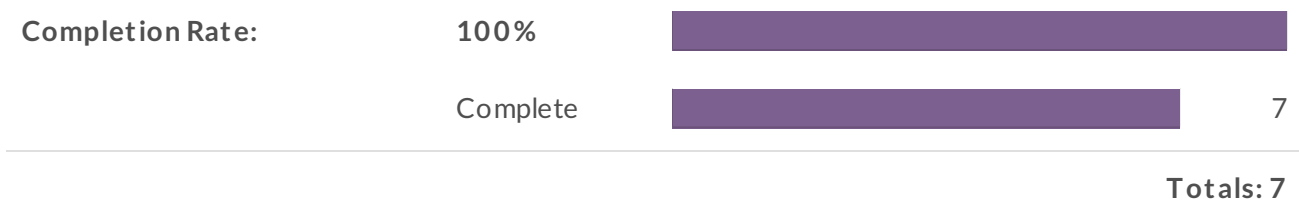


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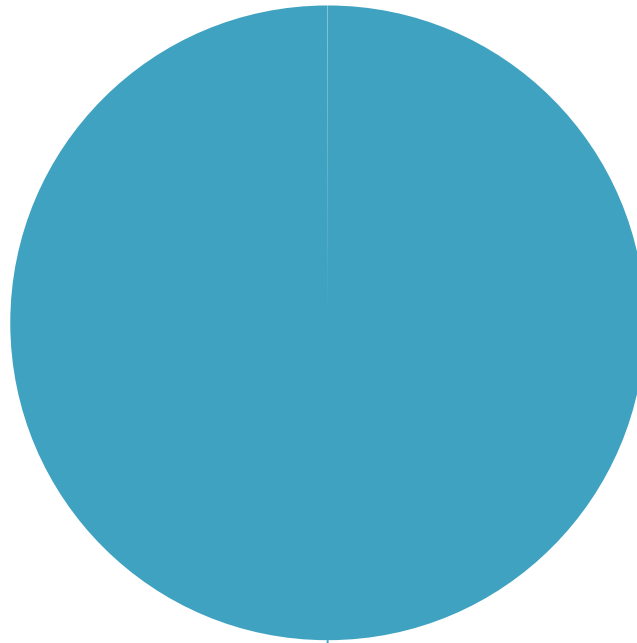
Only show: #1 Question "You are replying:" is one of the following answers ("On behalf of an organisation") and #18 Question "Please choose from one of the following options concerning the use of your contribution:" is one of the following answers ("My/our contribution can be published directly with my personal/organisation information (I consent to publication of all information in my contribution in whole or in part including my name/the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication). Note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001.")

Report for European Parliament - public consultation


Response Counts



1. You are replying:



100% On behalf of an organisation

Value		Percent	Responses
On behalf of an organisation		100.0%	7

Totals: 7

2. How old are you?

No data to display

3. What is your gender?

No data to display

4. What is your nationality

No data to display

5. What is your highest level of education?

No data to display

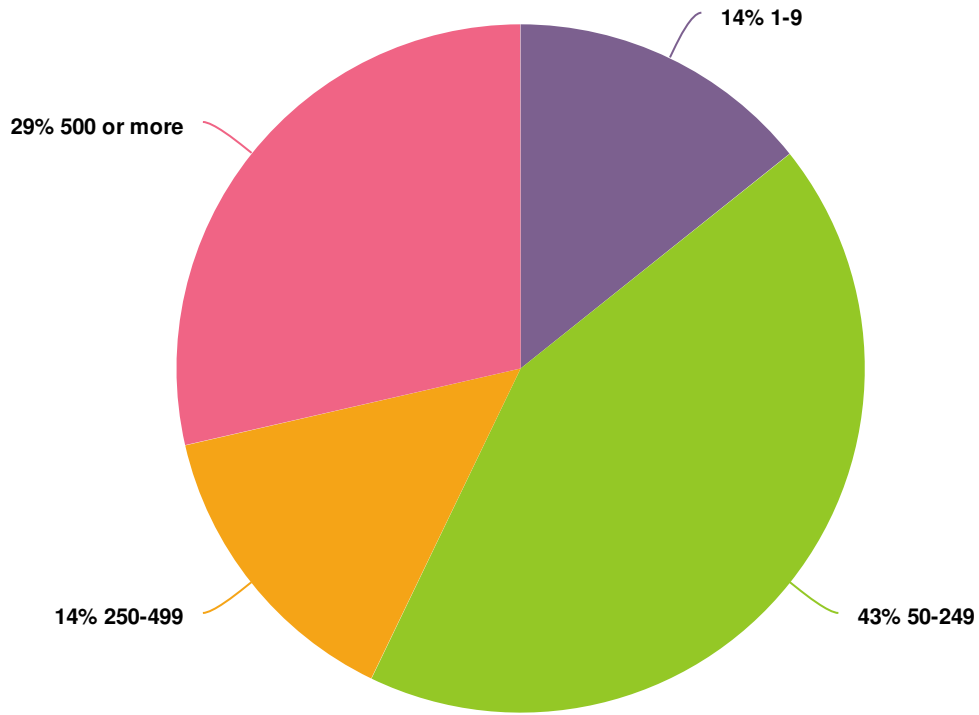
6. What is your current occupation?

No data to display

7. Have you studied, worked or lived in an EU Member State other than your country of origin?

No data to display

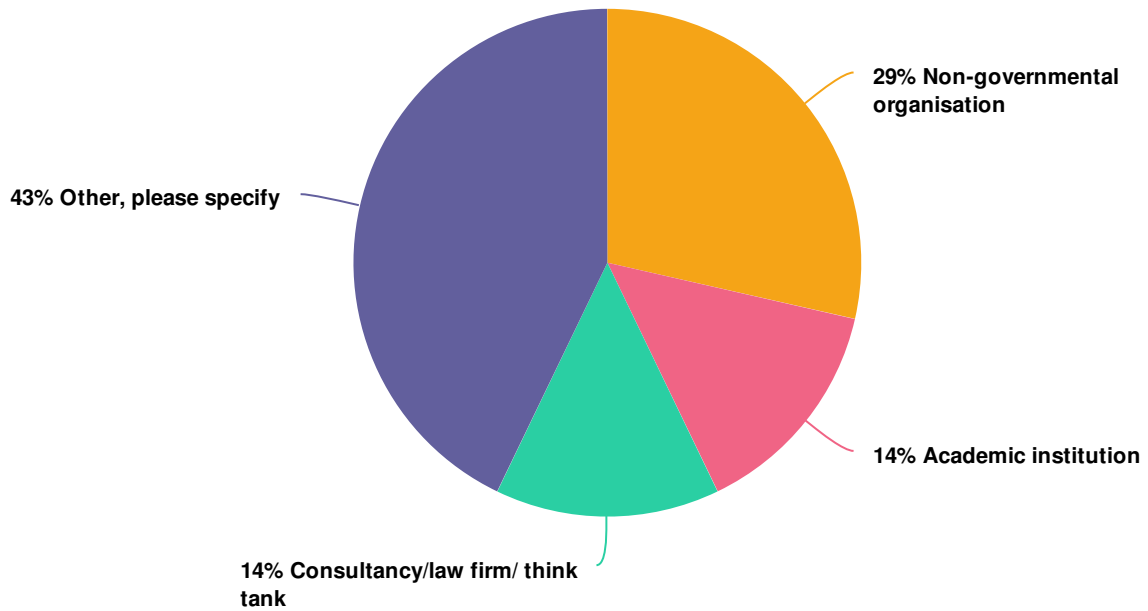
8. How many employees does your organisation have?



Value	Percent	Responses
1-9	14.3%	1
50-249	42.9%	3
250-499	14.3%	1
500 or more	28.6%	2

Totals: 7

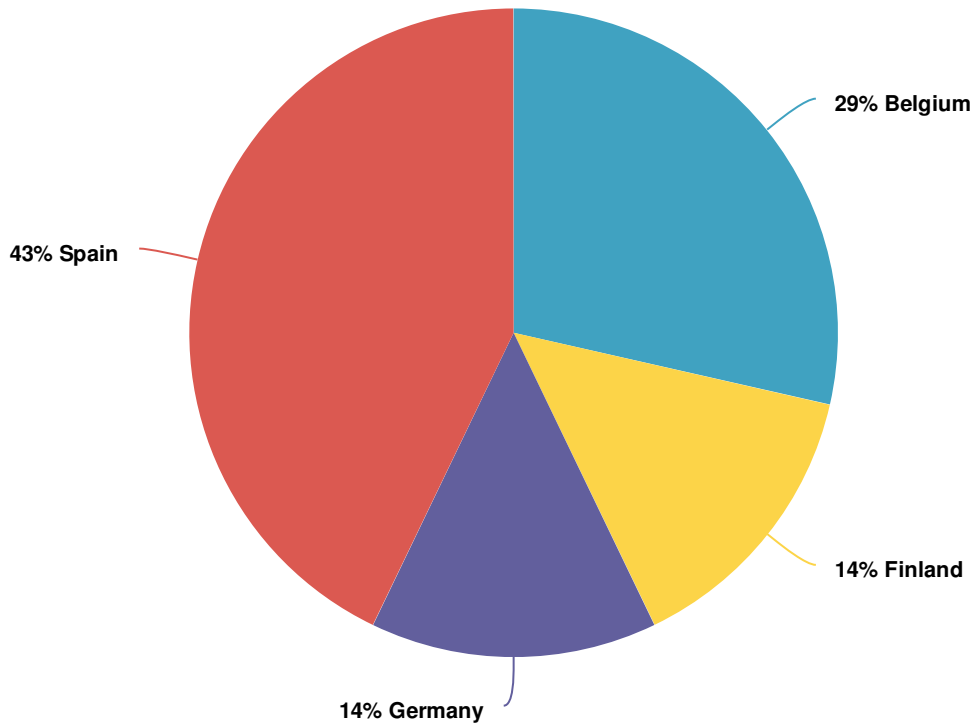
9. Please indicate the type of organisation



Value	Percent	Responses
Non-governmental organisation	28.6%	2
Academic institution	14.3%	1
Consultancy/law firm/ think tank	14.3%	1
Other, please specify	42.9%	3

Totals: 7

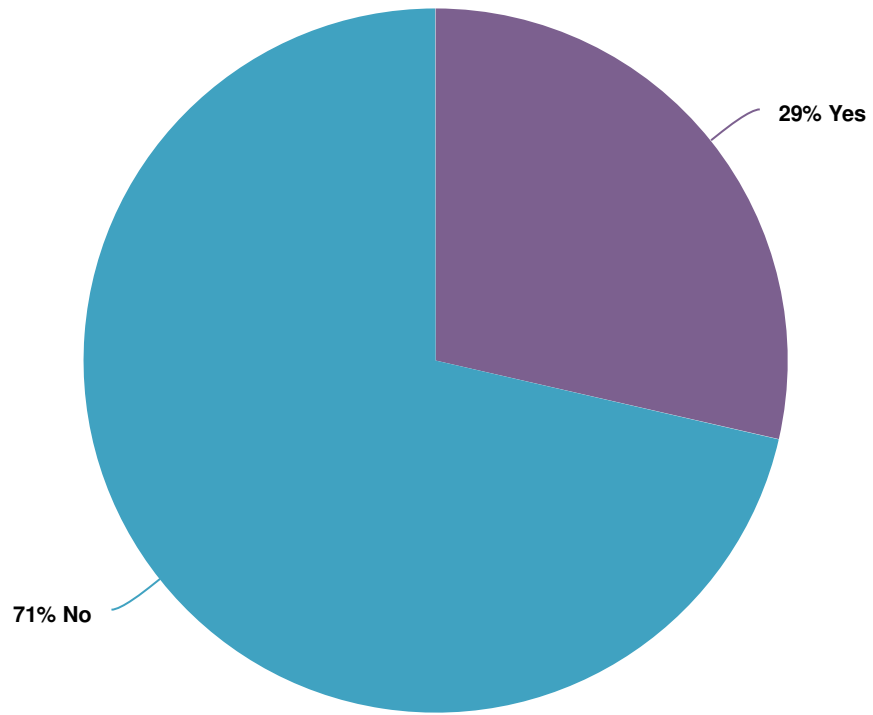
10. Where is your organisation primarily based?





Value		Percent	Responses
Belgium		28.6%	2
Finland		14.3%	1
Germany		14.3%	1
Spain		42.9%	3

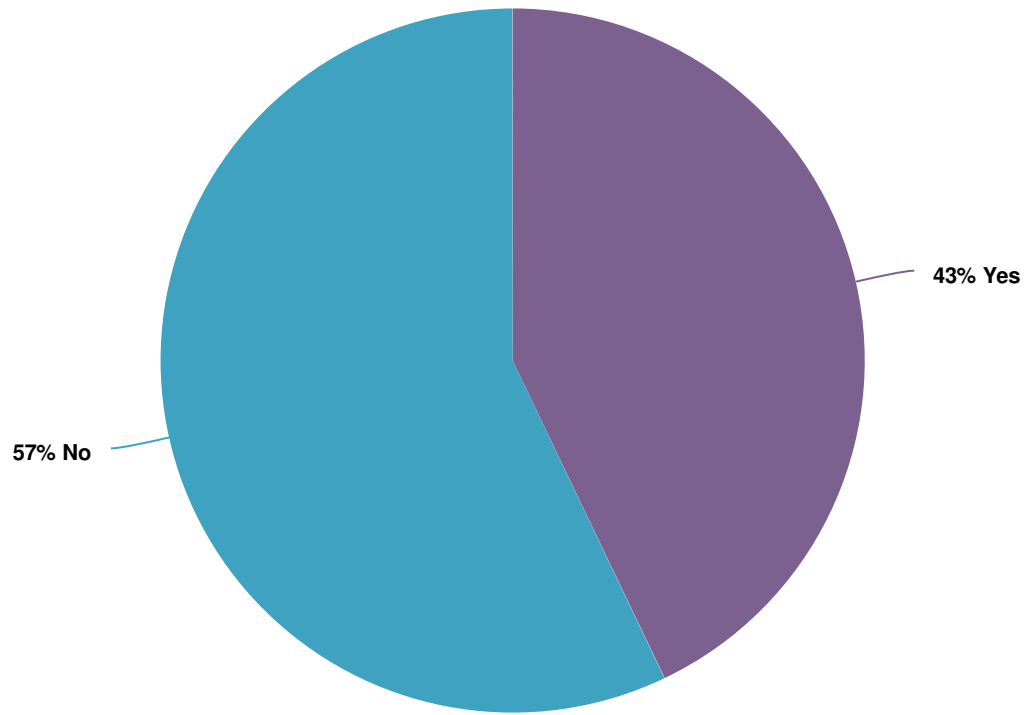
Totals: 7



11. Does your organisation operate in more than one country?



Value		Percent	Responses
Yes		28.6%	2
No		71.4%	5
			Totals: 7

12. Is your organisation included in the Transparency Register?



Value		Percent	Responses
Yes		42.9%	3
No		57.1%	4
			Totals: 7

13. Field of activity or sector (optional)



Count Response

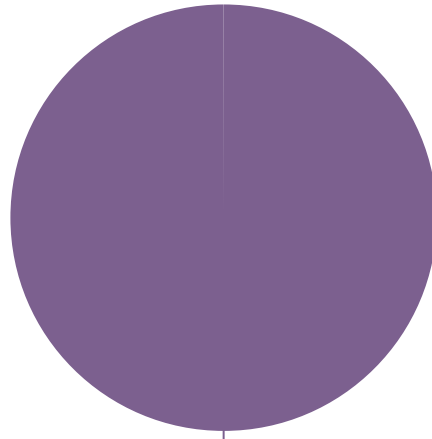
Count	Response
1	EU Administration (non-permanent staff)
1	Enseñanza e investigación en materia de Derecho Administrativo
1	Investigación sobre el Derecho administrativo en la Universidad
1	Ympäristön suojele
1	representation of skilled crafts companies and defending their interests in front of German and EU institutions

14. Name of the organisation (optional)



Count	Response
1	Asociación Española de Profesores de Derecho Administrativo (AEPDA)
1	European Risk Forum
1	Instituto Pascual Madoz (Universidad Carlos III de Madrid)
1	Luonnonsuojeluliitto Tapiola ry
1	NPS Forum
1	ORGANIZACIÓN NACIONAL DE CIEGOS ESPAÑOLES - ONCE
1	Zentralverband des Deutschen Handwerks

15. Please choose from one of the following options concerning the use of your contribution:



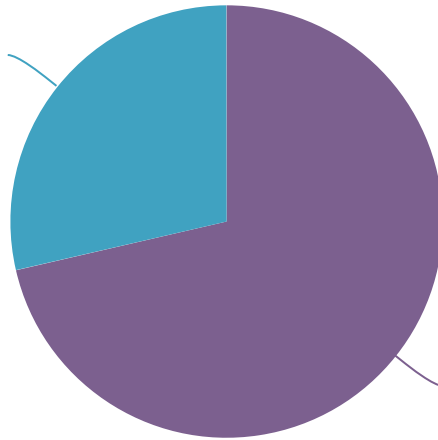
100% My/our contribution can be published directly with my personal/organisation information (I consent to publication of all information in my contribution in whole or in part including my name/the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication). Note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001.

Value	Percent	Responses
My/our contribution can be published directly with my personal/organisation information (I consent to publication of all information in my contribution in whole or in part including my name/the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication). Note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001.	100.0%	7



Totals: 7

16. Have you or your organisation had direct experience of dealing with the administration of the European Union?

29% No, I (or my organisation) has never had direct experience of dealing with the EU administration

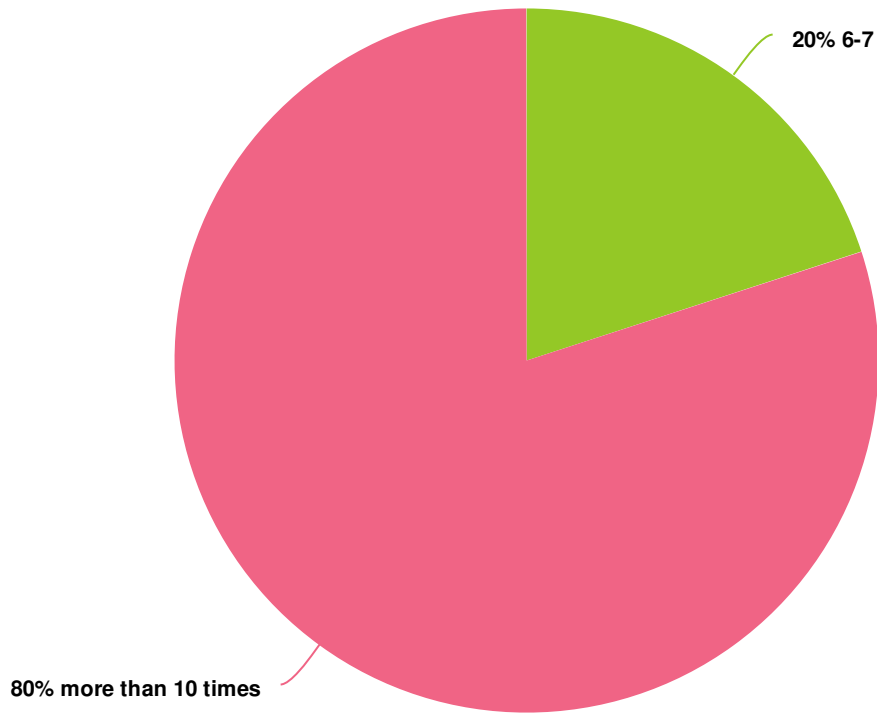


71% Yes, I (or my organisation) has had direct experience(s) of dealing with the EU administration

Value		Percent	Responses
Yes, I (or my organisation) has had direct experience(s) of dealing with the EU administration		71.4%	5
No, I (or my organisation) has never had direct experience of dealing with the EU administration		28.6%	2

Totals: 7

17. How many times have you (or your organisation) dealt directly with the EU administration?



Value	Percent	Responses
6-7	20.0%	1
more than 10 times	80.0%	4
Totals:		5

18. Please indicate with which EU institutions, bodies or agencies you had contact(s) and what is your general evaluation of this specific direct experience? (More than one choice of institution is possible; please indicate, however, only institutions with which you have had direct experience. If you have not had direct experience, please mark 'No direct experience')

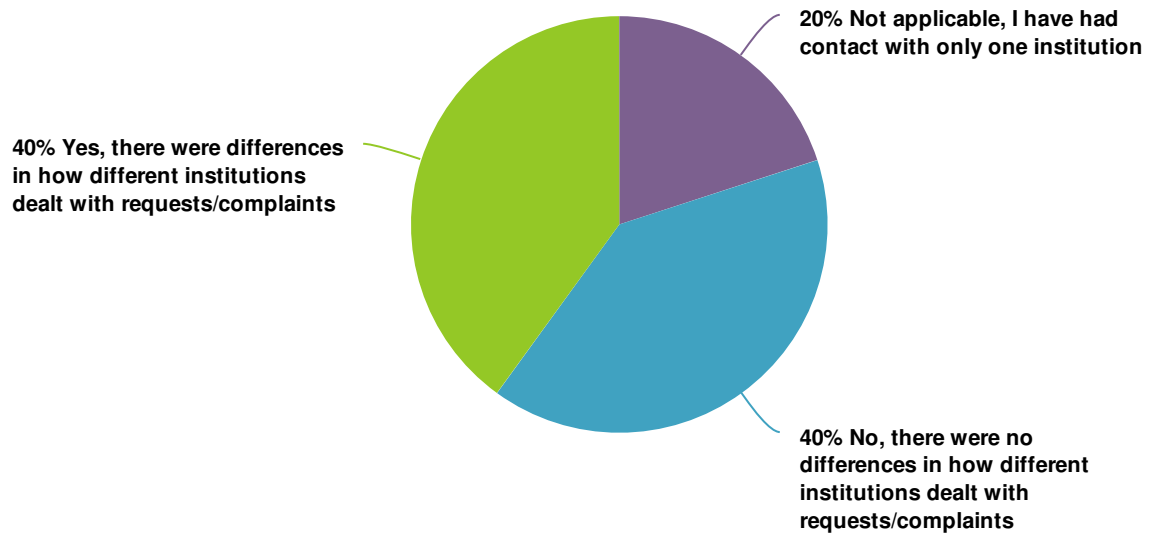
	Very positive	Positive	Negative	Very Negative	No direct experience	Responses
Council of the EU	0	2	0	0	3	5
Count	0.0%	40.0%	0.0%	0.0%	60.0%	
Row %						

	Very positive	Positive	Negative	Very Negative	No direct experience	Responses
European Anti-Fraud Office Count Row %	0 0.0%	0 0.0%	0 0.0%	0 0.0%	5 100.0%	5
European Commission Count Row %	0 0.0%	4 80.0%	0 0.0%	1 20.0%	0 0.0%	5
European External Action Service Count Row %	0 0.0%	1 20.0%	0 0.0%	0 0.0%	4 80.0%	5
European Ombudsman Count Row %	0 0.0%	0 0.0%	0 0.0%	0 0.0%	5 100.0%	5
European Parliament Count Row %	0 0.0%	5 100.0%	0 0.0%	0 0.0%	0 0.0%	5
European Personnel Selection Office Count Row %	0 0.0%	0 0.0%	1 20.0%	0 0.0%	4 80.0%	5
EU Agency Count Row %	0 0.0%	2 40.0%	0 0.0%	1 20.0%	2 40.0%	5
EU Delegations outside the EU Count Row %	0 0.0%	1 100.0%	0 0.0%	0 0.0%	0 0.0%	1

	Very positive	Positive	Negative	Very Negative	No direct experience	Responses
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Totals						
Total Responses						5

19. If you have had contact with the administration of more than one EU institution, body or agency, did you experience any substantial differences in how different institutions handle citizens' / companies' requests (including timeframe, procedural rights, etc.)?



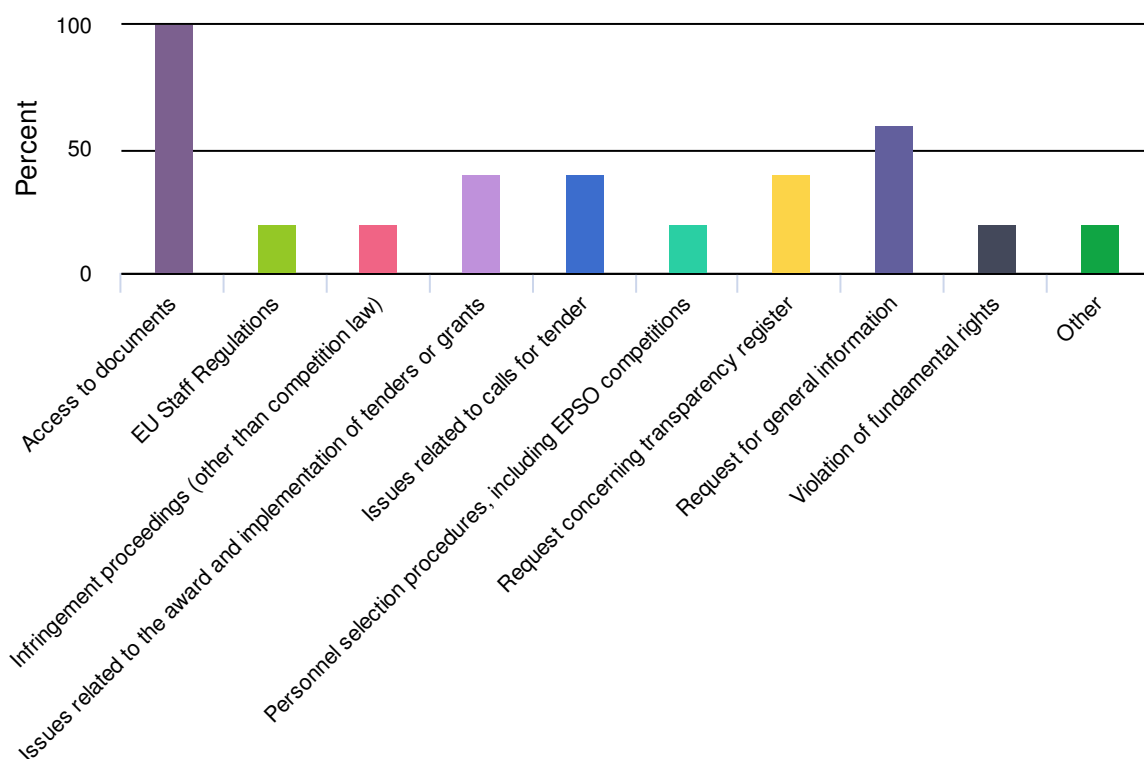
Value	Percent	Responses
Not applicable, I have had contact with only one institution	20.0%	1
No, there were no differences in how different institutions dealt with requests/complaints	40.0%	2
Yes, there were differences in how different institutions dealt with requests/complaints	40.0%	2
		Totals: 5

20. If yes, please explain



ResponseID	Response
437	los requisitos aún siendo más o menos los mismos son solicitados de forma y con formatos diferentes.
453	El tiempo de respuesta es más rápido y hemos apreciado mayor proximidad en el Parlamento Europeo

21. Why did you contact an EU institution, body, office or agency?



Value	Percent	Responses
Access to documents	100.0%	5
EU Staff Regulations	20.0%	1
Infringement proceedings (other than competition law)	20.0%	1
Issues related to the award and implementation of tenders or grants	40.0%	2
Issues related to calls for tender	40.0%	2
Personnel selection procedures, including EPSO competitions	20.0%	1
Request concerning transparency register	40.0%	2
Request for general information	60.0%	3
Violation of fundamental rights	20.0%	1
Other	20.0%	1

22. If other, please specify



ResponseID

Response

453

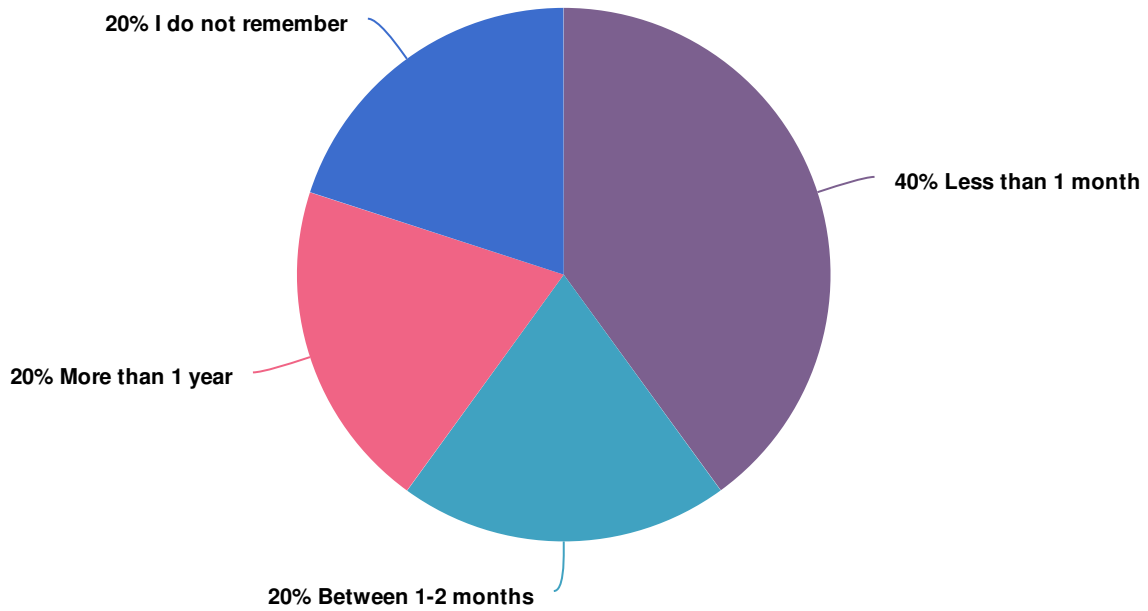
Programas ERASMUS y Jean Monnet




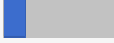
23. Please specify the EU policy area concerned by your contact with the EU institution (e.g. environment, health and food safety, consumer protection, agriculture, budget).



ResponseID	Response
105	All areas relevant for skilled craft companies, including e.g. environment, health and food safety, consumer protection, tax, finance etc.
302	Staff Regulations, Social Dialogue. The Commission does not respect ILO COntention 98 Art2 - (adopted by all Member States). The Commission offers benefits and privileges to unions - this resulted in disastrous results of the negotiations for the recent GIPs for Contract Agents: the CAs were not represented in social dialogue - they were permanently pushed out - and the permanent officials active in unions have not taken into consideration the requests and needs of these workers expressed by various petitions and open letters. One of the vital request was to to avoid forced unemployment after six year contract by allowing mobility within this labour market, based on EPSO tests and professional experience/skills.
427	Ympäristö
453	Educación superior, investigación, medio ambiente, ayuda al desarrollo

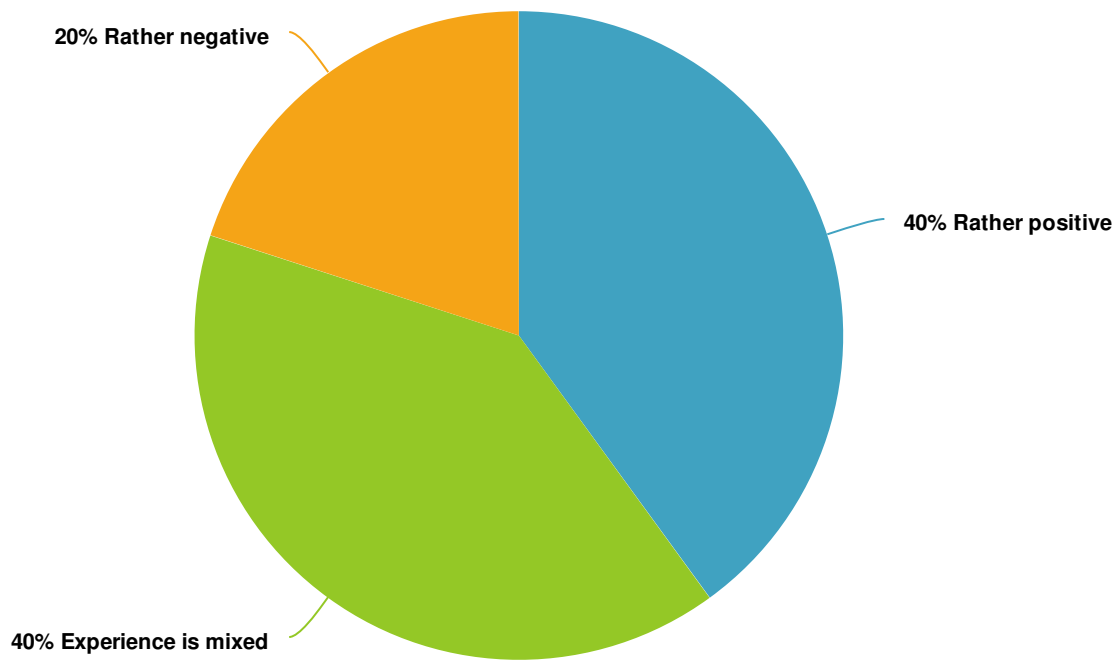
24. In general, how long did it take from the first contact with the EU administration until you received a final answer?




Value		Percent	Responses
Less than 1 month		40.0%	2
Between 1-2 months		20.0%	1
More than 1 year		20.0%	1
I do not remember		20.0%	1

Totals: 5

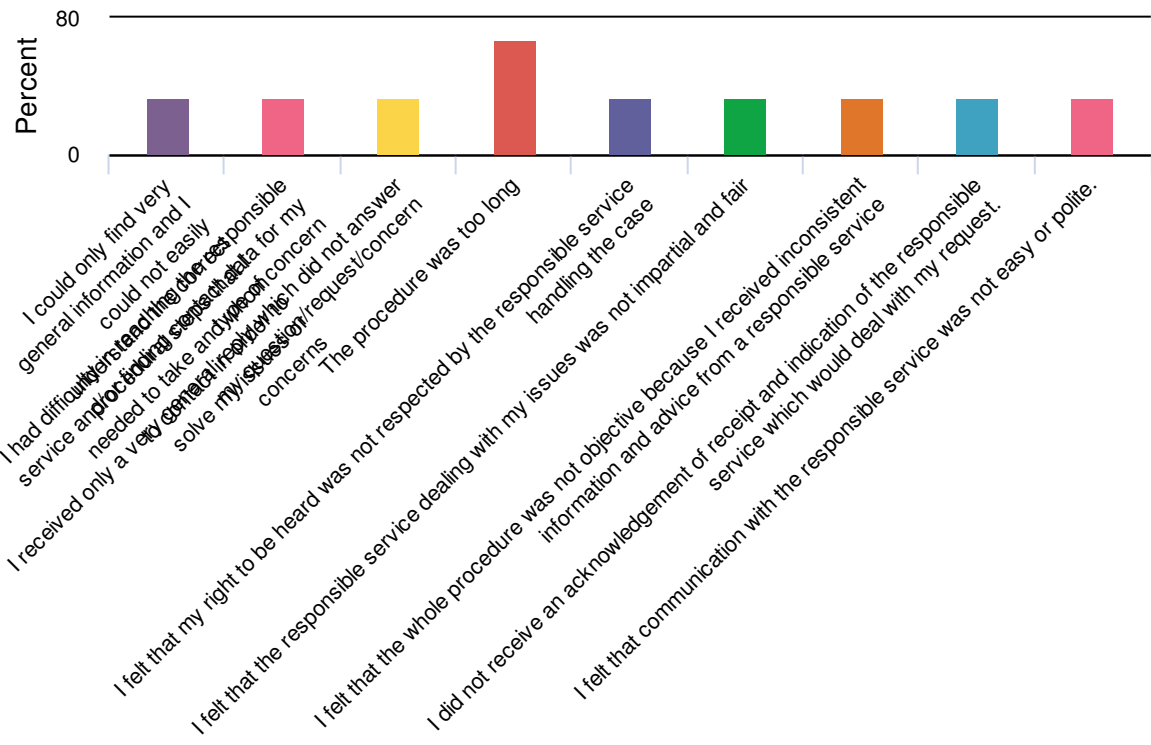
25. How would you in general evaluate your direct experience with the EU administration?












Value		Percent	Responses
Rather positive		40.0%	2
Experience is mixed		40.0%	2
Rather negative		20.0%	1

Totals: 5

26. You have indicated that you have had contact with the EU administration but your experience was negative or mixed. Why? What were the main problem(s) you directly experienced? (max. 5 choices)



Value		Percent	Responses
I could only find very general information and I could not easily understand the correct procedural steps that I needed to take and whom to contact in order to solve my issues or concerns		33.3%	1
I had difficulty in reaching the responsible service and/or finding contact data for my type of concern		33.3%	1
I received only a very general reply which did not answer my question/request/concern		33.3%	1
The procedure was too long		66.7%	2
I felt that my right to be heard was not respected by the responsible service handling the case		33.3%	1
I felt that the responsible service dealing with my issues was not impartial and fair		33.3%	1
I felt that the whole procedure was not objective because I received inconsistent information and advice from a responsible service		33.3%	1
I did not receive an acknowledgement of receipt and indication of the responsible service which would deal with my request.		33.3%	1
I felt that communication with the responsible service was not easy or polite.		33.3%	1











27. If other, please specify

No data: No responses found for this question.

ResponseID

Response

28. You have indicated that you have had direct contact with the EU administration and your experience was positive or mixed (max. 5 choices).

Value		Percent	Responses
I could easily reach the responsible service and/or find contact data for my type of concern.		25.0%	1
I could easily understand the correct procedural steps I needed to take and whom to contact in order to solve my issues or concern.		50.0%	2
I had no difficulty with access to electronic services (outdated web pages / broken links/ wrong re-direction/ etc.)		25.0%	1
I received a timely reply and was informed about each procedural step.		75.0%	3
I received a sufficiently detailed answer to my question/request/concern.		50.0%	2
The procedure was concluded within a reasonable time.		25.0%	1
I felt that the service dealing with my issue was impartial and fair.		25.0%	1
I felt that the service(s) dealing with my issue was knowledgeable/ competent.		25.0%	1
I received information on the possibilities of appealing the decision received.		25.0%	1
Other		25.0%	1

29. If other, please specify

ResponseID

Response

427

Nämä liittyvät tietopyynnön esittämiseen.

30. Based on your direct experience how would you evaluate on a scale of 1 (very problematic) to 6 (not problematic) the following elements of the provision of services by the EU administration?

	1	2	3	4	5	6	Responses
Administrative burden: costs for citizens or companies to obtain the service (i.e. number of procedural steps, time spend by a person on the total procedure) Count Row %	1 20.0%	1 20.0%	1 20.0%	2 40.0%	0 0.0%	0 0.0%	5
Costs incurred for obtaining information: costs for citizens or companies related to obtaining information concerning the procedure necessary to obtain the service (i.e. time spent on searching the information or hiring help for finding the correct information) Count Row %	1 20.0%	0 0.0%	2 40.0%	1 20.0%	1 20.0%	0 0.0%	5
Delay costs: costs for citizens or companies related to the length or delay in providing an administrative service Count Row %	1 20.0%	0 0.0%	0 0.0%	4 80.0%	0 0.0%	0 0.0%	5

	1	2	3	4	5	6	Responses
Operational incoherence costs: costs for citizens or companies related to the operational or regulatory inefficiencies of EU administration in providing the service (i.e. multiple agencies, institutions or bodies responsible for the same/similar type of inquiry that provide potential conflicting outcomes; necessity to submit the same/similar documents/ papers numerous times)	1 20.0%	0 0.0%	1 20.0%	2 40.0%	1 20.0%	0 0.0%	5
Count							
Row %							
Totals							
Total Responses							5

31. Based on your direct experience, on the scale 1 to 6 (1 very difficult - 6 very easy) How easy/difficult were the following 4 stages of the EU's administrative proceedings? Please mark each stage on the scale of 1 to 6. If your interaction did not cover all four stages of administrative proceedings please mark, 'not applicable'.

32. Optional: please explain or provide additional details about your direct experience at the different stages of administrative proceedings.

ResponseID Response

302 Between 2015 and 2017 thousands of Contract Agents from various DGs and executive agencies and delegations were involved in petitions and open letters addressed to unions and DG HR of the European Commission, without any result/ impact on the negotiations for the General Implementing Provisions (GIPs) for Contract Agents. The specific requests of the staff concerned (contract agents) were disregarded continuously and their presence in social dialogue was neither continuous or representative. The NPS Forum finally tabled 2 petitions to the European Parliament (PET I Committee) since the internal social dialogue was impossible. Petition 0178/2017 (still open) has already 1199 signatures and it was included already in a public hearing and Petition 0729/2017 (newer) on equal rights for EU Institutions employees is progressing well. The MEPs so far supported the initiative of the workers, asking important questions to the Commission who blames the "law makers".

427 Asian vireillepano on suhteellisen helppoa ja vaivatonta. Vastausta asiaa koskeviin tiedusteluihin ei saa lainkaan. Hallintomenettelyjen suhteen on hyvin erilaisia käytäntöjä. Komission suhteen asia on ollut vireillä yli kaksi vuotta, parlamentti otti asian käsittelyyn alle vuodessa.

33. A number of EU legal acts and policy documents guarantee certain procedural rights to citizens and companies in EU administrative proceedings. Based on your experience, do you see any problems/shortcomings related to the functioning of the EU administration and/or application/enforcement of EU rights and principles?

Value	Percent	Responses
Yes, I think certain right(s) or principle(s) requires further reinforcement at EU level	100.0%	5

Totals: 5

34. If other, please specify

ResponseID

Response

35. A number of EU legal acts and policy documents guarantee certain procedural rights to citizens and companies in EU administrative proceedings. Based on your experience, please mark the most important rights or principles that, in your opinion, require further reinforcement at the EU level (max. 5 issues).

Value		Percent	Responses
Anti-discrimination		40.0%	2
Impartiality, independence and objectivity		20.0%	1
Obligation to be proactively transparent in EU decision making		40.0%	2
Obligation to deal properly with issues related to lobbying		60.0%	3
Obligation to deal properly with requests for information		40.0%	2
Obligation to deal properly with requests for public access to documents		40.0%	2
Obligation to give reasons for decisions		40.0%	2
Obligation to make an appeal available		20.0%	1
Obligation to properly deal with whistleblowing situations		20.0%	1
Obligation to properly deal with issues of conflicts of interest		20.0%	1
Obligation to respect language rights		20.0%	1
Obligation to respect other rights and duties resulting from the Charter of Fundamental Rights and not covered by the above list		20.0%	1
Obligation to respect the right to be heard		20.0%	1

36. If other, please specify

ResponseID

Response

37. Optional - Please explain why in your opinion those issues require reinforcement?

ResponseID Response

105 As a business organisation, we require timely access to draft documents and agendas for meetings to properly react to latest developments. In particular, council documents (e.g. agenda for working groups etc.) should be accessible faster in order to allow for coordination with national governments.

302 The requirements that the European Commission is imposing on Member States should also be applied in house. For example, staff recruited after 2004 should have the same career perspectives as the staff recruited before 2004. ILO Convention 98 which is fully adopted by all the Member States (since 1951!) should also apply to the European Commission and across all administration. All workers in the EU should have the right to a proper social dialogue, including workers dedicated to the EU functioning. In addition, more attention should be given to conflict of interests such as unionists (permanent staff recruited before 2004) taking decisions affecting staff recruited after 2004: maintaining the second category in vulnerable positions on labour market and SELLING to them training services and materials.

437 La no discriminación es un principio de la UE a respetar, sobre todo si se trata de personas con discapacidad. El resto son obligaciones que mejorarán la transparencia y fluidez de las relaciones de la Administración de la UE con sus ciudadanos/empresas

38. You have indicated that you have had no contact with the EU administration. Why?

Value	Percent	Responses
There was no need, but if such a situation occurs I know how to contact EU administration	50.0%	1
Other	50.0%	1

Totals: 2

39. If other, please specify

ResponseID

Response

456

There was no need.

40. Optional: This is the end of section I on direct experience. If you would like to share any further details or observations on your direct experience with the EU services or provide more detailed explanations to the answers to the questions above, please provide it here

ResponseID Response

302 ILO COvention 98 couls help tremendously the EU Administration to become more clean from conflict of interests, more competent, more modern, more efficient. The competent contractual staff who passed EPSO tests and are on various reserve lists, as well as building professional experience for six (or more) years could continue their work within the EU administration, ensuring return on investment. What actually happens presently is that DG HR together with a handful of unionists (permanent staff recruited before 2004) permanently decide internal rules which push experienced people to unemployment while the service needs remain and are filled with new , untested and inexperienced staff, adding more costs and endangering business continuity (wasting taxpayer's money).




437 Es esencial que TODA la información sea facilitada en formato accesible con independencia del tipo de documento que sea y en la lengua oficial de que se trate.

445 La AEPDA, como tal, no ha tenido hasta la fecha contacto directo con las instituciones de la Unión, pero sus integrantes conocen bien el funcionamiento de estas y el Derecho de la Unión, como expertos en Derecho administrativo nacional y europeo

41. Based on what sources of information do you form your opinion regarding EU services/administration? (max. 3 options)




Value	Percent	Responses
Direct experience	57.1%	4
Experience of friends or colleagues	28.6%	2
Information from various internet sources	14.3%	1
Professional interests (i.e. I work for the EU institutions; I am an academic studying EU institutions; I work for an organisation that closely follows the work of the EU institutions)	71.4%	5

42. Generally speaking, what is your impression of the functioning of the EU services/administration in relation to the provision of services to citizens and companies?

Value		Percent	Responses
Rather good		57.1%	4
Rather bad		14.3%	1
Don't know		28.6%	2
			Totals: 7

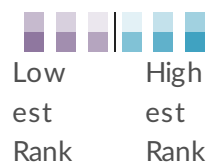
43. In your opinion, how easy or difficult is it to contact and receive information from the EU administration? Scale (1 very difficult; 2 difficult; 3 neither difficult nor easy; 4 easy; 5 very easy)

44. In your opinion, do citizens and companies have the same/similar standards of protection of rights and administrative procedural guarantees (for example, time limits to request information or submit a complaint; right to access to the file, type of remedies available) across all EU institutions/agencies?




Value		Percent	Responses
Yes, I think all EU institutions and agencies have similar standards and procedural guarantees		28.6%	2
No, I think each EU institution and agency has established different standards and procedural guarantees		57.1%	4
I do not know		14.3%	1
			Totals: 7

45. Based on your view on how the EU administration should work, please rank in the order of importance the following 11 rights and principles(1 most important - 11 less important)



Item	Overall Rank	Rank Distribution	Score	No. of Rankings
Transparency	1		66	7
Respect for fundamental rights	2		56	7
Public participation in EU decision-making	3		53	7
Respect for procedural rights, such as, for example the duty to state grounds for a decision	4		47	7
Accountability	5		43	7
Responsiveness	6		42	7
Ethics	7		40	7
Proper use of discretion (including in infringement procedures)	8		37	7
Good management of personnel issues, including recruitment	9		30	7
Sound financial management	10		29	7
Culture of service	11		19	7



46. In your opinion, has the function of the EU administration improved in the last 5 years?

Value		Percent	Responses
Completely disagree/ rather disagree		42.9%	3
Completely agree/ rather agree		28.6%	2
I do not know		28.6%	2
			Totals: 7

47. In general, do you know what services the administration of EU institutions and agencies provide to citizens and companies?

Value		Percent	Responses
Yes, I know very well (professionally involved) what services are provided to citizens and companies		42.9%	3
Yes, I have a general idea of what services are provided to citizens and companies		57.1%	4
			Totals: 7

48. If other, please specify

ResponseID

Response

49. In general, how familiar do you feel with each of the following instruments and rights related to the EU administrative procedure?

	extremely familiar	very familiar	not very familiar	not at all familiar	don't know	Responses
Access to European Parliament, Council and Commission documents by the general public (Regulation 49/2001) Count Row %	2 28.6%	4 57.1%	0 0.0%	0 0.0%	1 14.3%	7
European Code of Good Administrative Behaviour Count Row %	1 14.3%	3 42.9%	1 14.3%	0 0.0%	2 28.6%	7
European Parliament Resolution of 9 June 2016 on an open, efficient and independent European Union administration Count Row %	1 14.3%	2 28.6%	3 42.9%	0 0.0%	1 14.3%	7
The right to lodge a complaint with the European Ombudsman Count Row %	1 14.3%	4 57.1%	1 14.3%	0 0.0%	1 14.3%	7
The right to submit a petition to the European Parliament Count Row %	3 42.9%	2 28.6%	1 14.3%	0 0.0%	1 14.3%	7
Totals Total Responses						7

50. Please read the statements below related to the EU administration and EU administrative procedure and, based on your knowledge, indicate whether you think it is correct or not correct. If you do not know, please mark accordingly.

	Correct	Not correct	Don't know	Responses
<p>Any citizen or resident of the European Union, as well as any company, organisation or association with its headquarters in the European Union may submit a petition to the European Parliament on a subject which comes within the European Union's fields of activity and which affects them directly.</p> <p>Count Row %</p>	<p>6 85.7%</p>	<p>0 0.0%</p>	<p>1 14.3%</p>	7
<p>Currently, in the EU there is no legally binding code of administrative procedure applicable to all EU institutions, bodies, offices and agencies</p> <p>Count Row %</p>	<p>3 42.9%</p>	<p>1 14.3%</p>	<p>3 42.9%</p>	7
<p>EU administrative procedural rights and applicable rules are included in a variety of EU binding and non-binding legal instruments.</p> <p>Count Row %</p>	<p>5 71.4%</p>	<p>0 0.0%</p>	<p>2 28.6%</p>	7
<p>The 'European Code of Good Administrative Behaviour' developed by the European Ombudsman and endorsed by the European Parliament is binding on European institutions.</p> <p>Count Row %</p>	<p>3 42.9%</p>	<p>3 42.9%</p>	<p>1 14.3%</p>	7
<p>The Charter of Fundamental Rights of the European Union provides a fundamental right to good administration.</p> <p>Count Row %</p>	<p>4 57.1%</p>	<p>2 28.6%</p>	<p>1 14.3%</p>	7

	Correct	Not correct	Don't know	Responses
The European Ombudsman is the main non-judicial EU body charged with the task of addressing possible instances of maladministration by the EU administration.	5 71.4%	1 14.3%	1 14.3%	7
Count				
Row %				
Totals				
Total Responses				7


51. Optional: This is the end of section II on general attitudes, perceptions and knowledge about EU administrative law and procedures. Please provide here any other observations, comments or suggestions or explain in more detail the answers you gave to the questions in this section.

ResponseID Response

302 It is worrying that staff working for the European Commission (and generally withing the EU administration) is generally not protected/ encouraged for whistle blowing. Various conflicts of interests affect the service and nobody is taking any action, fearing losing their jobs.

456 EU risk management decisions are increasingly implemented through centralised procedures that have direct impacts on citizens and businesses (e.g. implementing / delegated acts; administrative decisions such as classification decisions, derogations, and substantive guidance). To date, good regulatory practices and Better Regulation principles are not systematically applied in these cases. Moreover, stakeholders and the public lack enforceable rights to ensure that the EU institutions and bodies abide by well-established principles of good administration. Poor governance of the EU's Administrative State increases the likelihood of "regulatory failure", limiting the socio-economic benefits of public policy. Decisions that are not of high quality often fail to deliver social goals or may generate rules where the cost of regulation exceeds its benefits or where there are substantial negative unintended consequences. The ERF invites the EU institutions to adopt a "comprehensive" EU LAP.

52. Generally speaking, do you think that the EU should take additional measures to reinforce EU admin procedure?





Value	Percent	Responses
Yes, the EU should take further measures in the area of EU administrative procedure	 100.0%	7

Totals: 7

53. You have indicated that you support further additional measures in the area of EU administrative law. In your opinion, what additional measures should be taken by the EU to help citizens and organisations?

	Yes	No	I do not know	Responses
Measures to enforce citizens' right to good administration Count Row %	7 100.0%	0 0.0%	0 0.0%	7
Measures to guarantee minimum procedural standards equally applicable across all EU institutions Count Row %	7 100.0%	0 0.0%	0 0.0%	7
Measures to simplify EU administrative rules and procedures Count Row %	7 100.0%	0 0.0%	0 0.0%	7
See key recommendations (Point 29) Count Row %	1 100.0%	0 0.0%	0 0.0%	1
Totals Total Responses				7

54. In your opinion, how can the EU best reinforce the functioning of the EU administration?









Value		Percent	Responses
The EU should adopt a new law that would provide minimum general standards applicable to all EU administrative procedures. Those general standards may be complemented by sectorial standards/rules as and when needed (for example, in the area of competition law or public procurement).		57.1%	4
The EU should adopt a new law that would set fully harmonised standards applicable to all EU administrative procedures and sectors of EU law.		42.9%	3
The EU should adopt a non-binding code of conduct applicable to all EU institutions and agencies.		14.3%	1
The EU should not adopt any new rules but try to improve already existing legislation.		14.3%	1

55. If other, please specify

ResponseID

Response

56. Why do you think the EU should take action in the area of EU administrative law? (Please select max. 3 issues that you consider most urgent/ important)

Value		Percent	Responses
To improve accessibility of the EU administration for the most vulnerable groups of citizens (i.e. citizens with reduced mobility, citizens with impaired hearing or vision, older people).		28.6%	2
To improve availability and openness of the EU administration for citizens and companies (for example, to have clear information on which EU agency/institution/ service need to be contacted and how this agency could be contacted; the type of services provided by the EU agency/institution/ service).		57.1%	4
To improve linguistic accessibility of the EU administration for citizens and companies (to receive a reply or information in one of the EU official languages).		14.3%	1
To improve the efficiency of the EU administration (time limits, quality of answers, etc.) in providing services to citizens and companies.		71.4%	5
To improve the level of protection of citizens' and companies' rights, including rights related to access to information and enforcement rights.		28.6%	2
To improve transparency of the EU administration (for example, clarity of the basis on which a decision by an EU institution is adopted, or of the procedural steps necessary to obtain information or submit a complaint) in the context of contacts between citizens/companies and EU institutions in the provision of services.		57.1%	4
To reduce the costs (monetary and non-monetary) for citizens and companies to request information from, or to submit a complaint to, the EU administration.		14.3%	1
To reduce the costs for EU administration (for example simplify procedures, introduce more e-services and advanced technological solutions).		28.6%	2

57. If other, please specify

ResponseID

Response

58. Optional: This is the end of section III on possible actions by the EU. If you would like to share any further details, observations, recommendations or suggestions on the actions or policy options that the EU should adopt to improve EU administrative law, please provide them here. Here you could also provide any other comments, recommendations, references to publications or other material related to the problems and solutions concerning the EU administrative procedure.

ResponseID Response

105 From a business organisation's perspective it is of utmost importance that all procedural steps in the EU decision making process are as transparent as possible. There is still room for improvement, in particular regarding Trilogue meetings, where meeting agendas and discussion documents are often not made available to stakeholders.

302 Reducing the salaries and pension rights benefiting the staff recruited before 2004 and making them equal to those benefiting staff recruited after 2004. This would reduce discrimination and create enough savings to build an inter-institutional job market for non-permanent staff, avoiding forced unemployment and increasing efficiency. These workers have already 6+ years of experience and they benefited public investment, then why throw them out completely, after six years of service, only to be replaced by new, untested and inexperienced non-permanent staff? The European Administration should not practice social dumping of any kind, being the watchdog of Fundamental Rights! Interim agencies profit from this practice and recruit ex-contract agents to offer them humiliating, even shorter term contracts in exec agencies, at much higher prices. There is no financial rationale behind this, anyway not in favour of the EU taxpayer.

445 La AEPDA (Asociación Española de Profesores de Derecho Administrativo), como asociación que integra a más de 350 profesores españoles de Derecho Administrativo, da pleno apoyo a las Resoluciones del Parlamento Europeo de 15 de enero de 2013 y 9 de junio de 2016 por las que se solicita formalmente a la Comisión Europea, al amparo del art. 225 TFUE, la presentación de una propuesta de Reglamento vinculante en materia de procedimiento administrativo, aplicable a la Administración de la Unión, que desarrolle el art. 298 TFUE. Un Reglamento semejante, similar a las leyes generales de procedimiento administrativo existentes en una mayoría de Estados miembros y en muchos otros países de fuera de la Unión, tendría efectos muy positivos, señalados por los numerosos autores que se han mostrado favorables a la aprobación del mismo, y que las distintas experiencias nacionales corroboran plenamente.

456 A comprehensive EU LAP should set out the legally-binding due process standards to be followed when implementing legislation, and would clarify and protect the rights of citizens and businesses when actions are taken that affect them directly. Key recommendations • Enshrine the principles of Transparency and Consistency; Public Participation; Public Record; and, Accountability in the EU LAP • Establish clear legally binding procedural standards • Ensure that clear judicial review standards guarantee full enforcement of those principles • Binding standards should include public notice and comment procedures and public consultation requirements • Include all EU institutions and bodies involved in the preparation, adoption, implementation and repeal of implementing or delegated legislation within the scope of the EU LAP • Require the Secretariat-General of each EU institution to establish internal enforcement procedures. MORE INFORMATION: ERF COMMUNICATION 18, www.riskforum.eu/p

