

## MORAIS BISMARQUE GASPAR Ana Gloria

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**From:** Aline Delhaye [REDACTED]  
**Sent:** 20 June 2014 12:43  
**To:** Euro-Ombudsman  
**Subject:** [EOWEB] Public consultation concerning the composition of European Commission expert groups  
**Attachments:** Public consultation concerning the composition of European Commission expert groups.docx

### Sender

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**Sender** Aline Delhaye [REDACTED]  
**Date** Friday, June 20, 2014 12:43:00 PM CEST

### Your data

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#### Part 1 - Contact information

<b>First name</b>	Aline
<b>Surname</b>	Delhaye
<b>Gender</b>	Female
<b>E-mail address</b>	[REDACTED]

Language you would like to receive an answer in en - English

#### Part 2 - Data

**Subject** Public consultation concerning the composition of European Commission expert groups  
**Public consultation concerning the composition of European Commission expert groups**

**1. Which specific Commission expert groups do you consider to lack a balanced representation of relevant areas of expertise and interest in their membership? What, according to you, is the root cause of the unbalanced composition of the Commission expert groups identified by you?**

The Driving Licence Expert Group from DG MOVE/Road Safety Unit as it does not include PTW riders inputs, many of which have extensive expertise in training issues and safety matters, but also can report on accessibility and problems encountered in the different members states from a end-user perspective. We are currently facing difficulties with the Driving Licence Directive implementation and have several times found out about changes adopted in this group with no consultation, no information at all, and the need to react very late in the process to point out the problems of the decisions taken (example: access to vehicle tests, gender issue with vehicle weight and size for passing the tests, etc...).

#### Content

I do not know who set up such WG, but I do know that there is a willingness to stick to the current composition of the WG to limit the issues to be handled. Obviously, we are keen of being able to exchange views and inputs with Member States representatives about the problems encountered with the 3<sup>rd</sup> Driving Licence Directive implementation and the preparation of the next measures which will impact the access to motorcycling, hence the entire sector dynamics.

**2. The Commission's horizontal rules on expert groups allow for the Commission to appoint individual experts in their personal capacity. In your experience, does this possibility give rise to concern in terms of the balanced composition of expert groups and/or conflicts of interest?**

Theoretically yes I believe, but not to my (limited) knowledge and not so far.

**3. Do you consider that the current level of transparency regarding the composition of Commission**

**expert groups, in particular through the Register of Commission Expert Groups and Other Similar Entities, is sufficient? In particular, does the information made available by the Commission allow you to ascertain which interests are represented by the members of Commission expert groups? If not, where do you see room for improvement? Do you consider that the current level of transparency regarding the work of expert groups, in particular through the publication of agendas and minutes, is sufficient?**

yes

**4. Where the Commission publishes calls for application for membership in expert groups, do you consider that these calls provide for selection criteria which sufficiently take into account the need for a balanced composition of expert groups? If not, where do you see room for improvement? In your view, could the Commission do more to raise awareness about these calls, with a view to encouraging applications? If so, what concrete steps could it take in this regard?**

Yes the Commission should do more to raise awareness about these calls with a view to encourage applications. We missed the ITS Advisory Group call for applications and despite a letter to the Head of Unit, no amendment was made to the selection procedure in order to include us (while no recognized representative organization FIM-ACEM-FEMA from the sector was involved yet).

A process in which the Unit in charge of the setup of the WG searches for representative organisations involved in Commission work and/or missing from it, and contact them by initiative would compensate for limited resources available for these organisations to monitor Commission vast work.

**5. Do you have any experience in applying for membership in a Commission expert group? If so, did you face any problems in the application process? If not, are you aware of any such problems faced by civil society organisations? Based on your experience, do the costs inherent in participation/the lack of comprehensive reimbursement schemes discourage civil society organisations from applying for membership?**

No, and I do not know about any such problems. As for discouragement, it depends, whether meetings are taking place in Brussels or not. For Civil Society organisations based in Brussels, only staff time is an issue to apply and follow the work of these WGs if organized in Brussels. The problem is more acute, when meetings are moving from one place to the other (ex. Standardization work at CEN)

**6. Please give us your views on which measures could contribute to a more balanced composition of Commission expert groups.**

Have an external entity that specifically focuses at having a balanced approach to the Commission work and validates the existing experts, and or recommends to contact some specific other experts to balance debates.

**7. Do you have any other comments?**

I am currently General Secretary at the Federation of European Motorcyclists Associations (FEMA a.s.b.l.) and because of the lack of resources, I am only following transportation issues addressed by DGMOVE/ITS unit, DGENTR and DGMOVE/Road Safety Unit and only report about the work I am aware of, which is per se I guess something to consider as expecting Civil Society to follow all Commission work in all DGs is not possible. The initiative to ensure that Civil Society is properly represented in Expert Groups should be the responsibility of the Commission, with "eligible costs" covered in case this cannot be funded by the organization itself.

Alternatively, Commission could ensure that a neutral "democratic stakeholder" is part of the expert group and helping the Commission to identify where the debate is being unbalanced. There are several organisations that could do such job if again specific resources are dedicated to these tasks.

Finally, a 3<sup>rd</sup> option would be not to worry about the preparatory process of the regulatory texts (namely the Commission process with Expert groups), but ensure a larger role to the ESSC and the CoR, who should then have a better participatory process with proper funding.

## Public consultation concerning the composition of European Commission expert groups

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