

Brussels, 23 October 2018

## Position paper

# Stocktaking of the Commission's 'Better Regulation' approach: *Cooperatives Europe' views*

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Cooperatives Europe is the European cross-sectoral organization representing cooperative enterprises. On behalf of its 86 member organisations from 34 European countries across all business sectors it promotes the cooperative business model in Europe. Its members represent 140 million individual member cooperators owning 176,000 cooperative enterprises and providing jobs to 4,7 million European citizens.

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The European Commission has been developing a comprehensive better regulation policy, that in 2015 became one of Jean-Claude Juncker-led Commission's top priorities. In this framework, the Commission published a [public consultation on the stocktaking of its 'Better Regulation' approach](#) in July 2018, which aims to assess how well the various better regulation tools used by the Commission work in practice and contribute to achieving the objectives of its better regulation policy.

Cooperatives Europe welcomes the positive work achieved by the Commission to comply with its Better Regulation agenda in improving the tools that provide stakeholders with opportunities to contribute to the EU policy-making process. From a general point of view, Cooperatives Europe welcomes the various existing tools (roadmaps, inception impact assessments and public consultations) that allow stakeholders to be informed and contribute at an early stage of the policy-making process.

Nonetheless, Cooperatives Europe would like to emphasise on the importance of the roadmaps and inception impact assessments being as detailed as possible as well as allowing sufficient time for stakeholders to adequately respond and provide input. Concerning public consultations, although such tool is one of the preferred channels for our members to submit opinions, it also requires improvement. Indeed, questions are often long and complex or steer the answers towards a certain



outcome. Additionally, the Commission should better take into account the diversity of business models (e.g. cooperatives, social economy enterprises, social enterprises, family businesses, etc.) when drafting the questionnaire in order to properly answer in accordance with our specific business model. We also regret the fact that for some consultations, the Commission publishes them first in English and then in other EU languages with a delay. But this way is sometimes an issue for our national members and businesses active at local level as it prevents them to contribute. Consultation forms should also be provided in an editable format to allow business organizations to fill and spread across their networks for input. Moreover, for some public consultations, the period during which they are published could be inadequate for collecting input and responses, particularly during holiday periods (Easter, July-August and December-January). Lastly, the Commission reports on the results of its public consultations should explain in greater detail how consultation feedback has been considered. Cooperatives Europe would also like to stress the fact that when assessing new Commission proposals – through impact assessments – the assessment has to be transparent regarding the methods and data used. Moreover, it should be explained how feedback from stakeholders is being incorporated.

We believe in the Commission's intention to consider our opinion through this consultation process and also remain at its disposal should they need further input from the cooperative sector.

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