



Brussels, 8 October 2007  
D(2007) 8771

## Opinion

**Title**                                    **Impact Assessment on: Communication on an EU strategy for Social Services of General Interest (SSGI)**

**(draft version of 12 September 2007)**

**Lead DG**                                    **DG EMPL**

### **1) Impact Assessment Board Opinion**

#### **(A) Context**

The proposed Communication is a follow-up to the White Paper on services of general interest in 2004 and the Communication on social services of general interest (SSGI) in 2006. The White Paper concluded that Community rules may have an impact on the instruments for delivery and financing of social and health services, and that it would be useful to clarify the legal framework. The 2006 Communication was a first step in this direction.

#### **(B) Positive aspects**

The consultations carried out in preparation of this initiative have been elaborate, and although the summary of the outcomes could still be improved in a few respects, the IA report overall gives a good and fair account of the support, respectively doubts that were expressed about an EU initiative in this policy area.

#### **(C) Main recommendations for improvements**

*The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG.*

**General recommendation: The IA report can be improved in a number of key aspects. The problem definition should clarify the scope and magnitude of the problem. Moreover, the preferred option should better demonstrate proportionality and complementary actions on enhancing quality and efficiency should be motivated better.**

**(1) The problem definition should clarify the scope of the initiative, in particular**

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whether this initiative applies only to social services of general economic interest and how it relates to the services in the health sector. Furthermore, the IA report should clarify whether the initiative covers economic and non-economic services and how the competition and internal market rules apply to these services.

**2) The magnitude of the problem should be explained in more detail by providing some concrete cases.** For each identified problem component the IA report should be clear to which extent there is concrete evidence, and whether the problems are the same for all social services of general interest or whether it is necessary to distinguish between types of services. This could be usefully done by at least providing some examples that have occurred in practice. Furthermore the IA report should provide an overview on how the problem would evolve (deterioration or improvement) in the absence of Community action. To the extent that the IA report aims to address problems regarding the quality and efficiency of social services of general interest it should clearly set out the Community dimension of this problem.

**3) The preferred option should be made more transparent and its proportionality to the problem should be better demonstrated.** The IA report should make more transparent that the problem at hand would be solved best in terms of overall effectiveness and proportionality by the preferred option 2.

**4) Complementary actions – enhancing quality and efficiency - should be better motivated and linked to the options.** One of the implicit objectives (especially of the complementary actions) seems to be the need to improve the quality and efficiency of social services of general interest. The IA report should better explain the specific value added of the envisaged Community action and that these complementary actions form part of all options.

#### **(D) Procedure and presentation**

It appears that all necessary procedural elements have been complied with.

## **2) IAB scrutiny process**

Reference number	2007/EMPL/003
Author DG	EMPL-E-4
External expertise used	No
Date of Board Meeting	3 October 2007
Date of adoption of Opinion	8 October 2007