



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

**(1) Better define the scope of the initiative.** The report should focus more clearly on the way in which this initiative would relate to the existing European Qualification Framework. It should present the concrete problems that this initiative intends to address more clearly (i.e. how to validate), instead of providing general statements about the importance of informal learning.

**(2) Strengthen the problem description and develop the baseline.** The report should provide a more detailed overview of current validation practices, including for formal and informal/non-formal qualifications, and their impacts in Member States. It should analyse the underlying causes of the different level of development of national validation systems. It should then explain and substantiate the transnational problems resulting from this difference, and explain why current labour market and education policies have not been able to address these problems. It should also explain the role of other instruments related to the validation of informal and non-formal learning, including those developed by stakeholders, and should assess to what extent they may already address the problems. The baseline should clearly show how the situation with regard to validation of informal learning and its expected impacts (e.g. on employability) is likely to evolve if no new action is taken at EU level. This should include action which could be undertaken by the various social partners.

**(3) Strengthen the intervention logic.** The report should provide a more focused set of specific objectives that address the concrete problems related to the way in which systems for the validation of qualifications deal with informal learning. On the basis of these more focused objectives, it should provide a careful assessment of the extent to which existing coordination mechanisms or other initiatives, including by stakeholders, may be adequate to produce the required changes (e.g. HR policies of multinational enterprises, or qualification passports developed by European social partners).

**(4) Assess the costs and benefits of the envisaged actions.** The claim in the report (section 6.1) that "it is expected that the benefits of validation [...] will finally outweigh the costs" should be substantiated by providing concrete figures for expected costs and (where possible) argued estimates for the expected benefits (both at aggregated and Member State level). The report should explain why a different magnitude of impacts are expected for options 2 and 3 (e.g. for economic growth and employment impacts), and it should base the presented figures more systematically on observed experience or on stakeholder feedback. The report should also explain the assumptions on which the assessment of impacts is based.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

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

The report should clarify the way in which the stakeholders that were invited to respond to consultation were selected. It should also better reflect stakeholder opinions throughout the report. The report should state explicitly which European sectoral social dialogue committees and/or Councils for skills and employment have been consulted, given their long-standing involvement in promoting training and lifelong learning tools, including for validating informal qualifications.

<b>(E) IAB scrutiny process</b>	
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