



European Bureau of Library, Information and Documentation Associations

Lobbying for archives and libraries

EBLIDA, the *European Bureau of Library, Information and Documentation Associations*, is an independent, non-profit umbrella organisation of national library, information, documentation and archive associations in Europe. Subjects on which EBLIDA concentrates are European information society issues, including copyright and licensing, culture and education and EU enlargement. We promote access to information in the digital age, and the role of archives and libraries in achieving this goal. We represent the interests of our members to the European institutions, such as the European Commission, European Parliament, and the Council of Europe.

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EBLIDA Response to the European Commission's Green Paper "European Transparency Initiative" [COM (2006) 194 final of 3 May 2006]

III. FEEDBACK ON APPLICATION OF THE MINIMUM STANDARDS FOR CONSULTATION

Question:

In your view, has the Commission applied the general principles and minimum standards for consultation in a satisfactory manner? You may refer to the individual standards (provided, for ease of reference, in Annex 2). Please give reasons for your reply and, where appropriate, provide examples.

In the time limits for consultation, the exhortation to 'strive to allow at least 8 weeks for reception of responses to consultation' seems to us inadequate. Eight weeks during the summer is convenient for the Commission but very inconvenient for associations who have to consider the consultation and come to an agreed view. Consultations beginning in July or August should be for at least ten weeks. We have on our files a record of a consultation notified to us by e-mail on 8 July 2005 with a deadline of 28 July 2005 (e-mail of 8 July 2005 inviting comments on the web-based *Working Document Management of copyright and related rights*, the Commission staff working document *Study on a Community initiative on the cross-border collective management of copyright*, and the web-based *Frequently Asked Questions* (MEMO/05/241 of 7 July 2005). A summer consultation with such a tight deadline is not a true consultation.

The Hague, 31 August 2006