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12 OPINION ABOUT THE DRAFT COMMISSION EVALUATION POLICY GUIDELINES

13

14 First of all, a lot of thanks to the Secretariat-General for organising this very important
15 consultation about evaluation policy guidelines.

16

17 This opinion represents an opinion of an individual citizen, not any legal entity.

18

19 This opinion does not contain:

- 20 – any business secrets
21 – any trade secrets
22 – any confidential information.

23

24 This opinion is public.

25 Secretariat-General can add this opinion (the PDF file) to a relevant web page.

26

27 Annex 1 holds information about previous opinions in the EU level.

28 Annex 2 holds information about disclaimers and copyright.

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32 With Kind Regards,

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35 Jukka S. Rannila
36 citizen of Finland

37

38 signed electronically

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41 [Continues on the next page]

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1. General: Previous consultations

In the Annex 2 is a list of my previous opinions, which are mostly addressed to different Directorate-Generals of the European Commission. Some parts of the previous opinions can be used in this opinion.

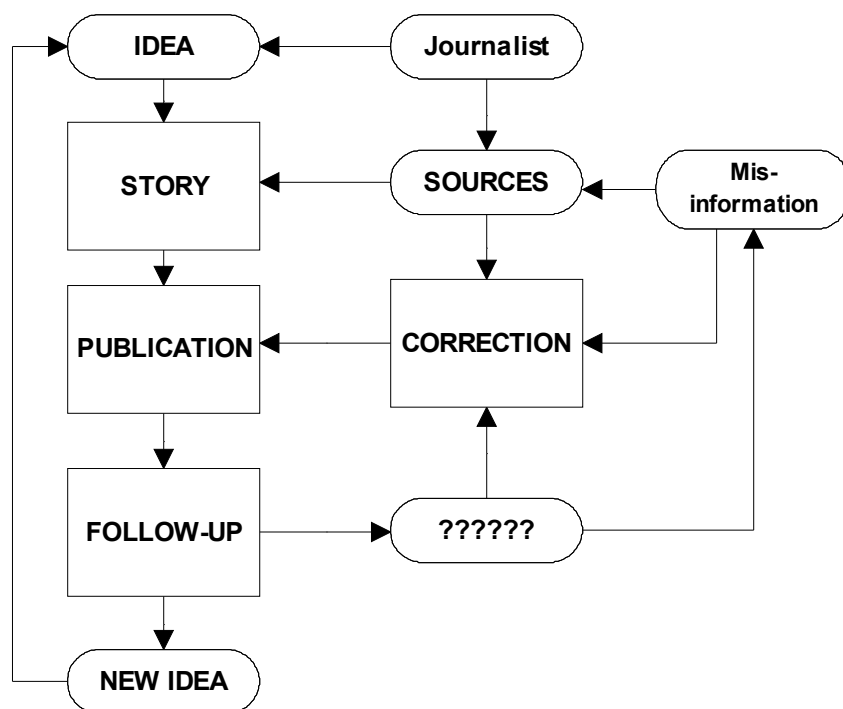
2. Amount of documents related to this opinion.

From the ¹ consultation web page it is possible to download several documents, and the amount of the pages in those documents can be overwhelming for some stakeholders.

Since I have not read all possible documents thoroughly, this opinion can be somewhat sporadic.

3. Amount of misinformation?

In the opinion 40 (Media Freedom and Pluralism / audiovisual regulatory bodies) I constructed the following figure.



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The figure is a simple conception of a journalistic publication: from an idea to another idea. In the middle there is the publication of a story. The problem nowadays is the follow-up of a story, and the possibility for the misinformation in several stages. Also, the correction process for a story might be

¹ http://ec.europa.eu/dgs/secretariat_general/evaluation/consultation/index_en.htm, the page was available 11 December 2013.

66 flawed, since the misinformation distribution is always a challenge.

67

68 The problem in the current media landscape is the amount misinformation, since there are
69 nowadays several organisations, and part of those organisations may not adhere ² to the journalistic
70 guidelines. So, part of the media messages are not news provided by traditional news organisations,
71 which are adhering to some journalistic guidelines.

72

73 How is this related to the proposed evaluation policy guidelines? One problem with European
74 Union activities is naturally the misinformation about different policies in the European Union
75 level.

76

77 **Proposal 1: One part of the evaluation could be assessing the amount and the quality of**
78 **the misinformation related to some policies.**

79

80 The hard reality is, that there is always some misinformation floating/distributed in the different
81 media channels. Like said before, part of those media channels (sometimes “new”) do not adhere to
82 any journalistic guidelines.

83

84 **4. Questionnaires for the members of different stakeholders (associations)**

85

86 In the opinion 8 (European Interoperability Framework, version 2, draft) I constructed the following
87 figure. [Figure on the next page]

88

89 The main idea was distributing questionnaires for different IT expert ³ associations, and members of
90 those associations could assess different IT standard proposals. Nowadays a lot of questionnaires
91 can be distributed and answered using different electronic measures.

92

93 **Proposal 2: Part of the evaluation could be organising (electronic) questionnaires for**
94 **members of different stakeholder/expert associations.**

95

96 The questionnaires can be very structured or very free-form. The advantage of very structured
97 questionnaire is naturally the ease of processing the results of an questionnaire. Answers to free-
98 form questionnaires can result a lot of documents, and their assessment can mean a lot of manual
99 processing.

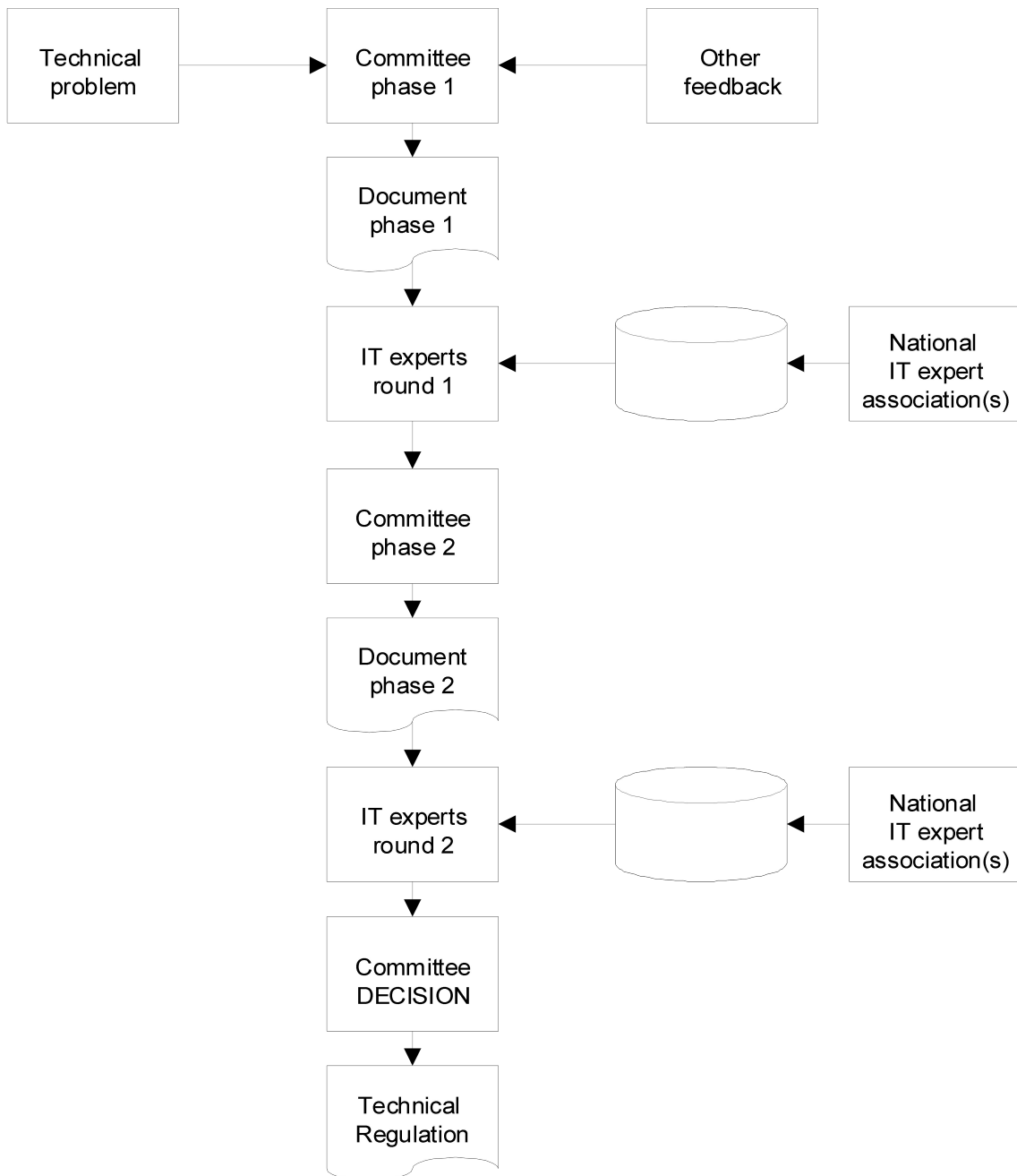
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101 [Continues on the next page]

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2 http://www.jsn.fi/en/guidelines_for_journalists/, e.g. the (Finnish) Guidelines for Journalists (and an Annex) (2011 version of the Guidelines).

3 <http://www.ttlry.fi/english>, The Finnish Information Processing Association, FIPA, (Tietotekniikan liitto ry) is one example of an IT expert association.



104 **5. Central web page for evaluations?**

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106 There is mentions about the central web page for evaluations. If ALL different evaluation projects
107 are listed on the central web page, it is very laudable proposal.

108

109 In the previous opinions, I have advocated the usage of RSS feeds. One on of the most used

110 information feed is naturally RSS, and especially the ⁴ version 2.0. The European Commission
111 could provide different RSS feeds based on the current information needs after consulting different
112 stakeholders.
113



114
115
116 One possibility is to use existing “Your Voice in Europe” ⁵ information service for different
117 evaluation projects.
118

119 **Proposal 3: The proposed central web page of evaluation (projects) must provide**
120 **different information feeds (especially RSS) about evaluation (projects).**
121

122 In practice, people are nowadays very wary of giving their electronic mail (email) addresses, since
123 the amount of unwanted electronic mail (email) messages (aka spam) is an enduring problem. With
124 the help of different information feeds (especially RSS), there is no need to gather electronic mail
125 (email) addresses.
126

127 **6. Terms of Reference – Model Documents**

128

129 There is some mentions about Terms of Reference. In some previous opinions I have advocated a
130 project for creating very simple and readable documents.
131

132 **Proposal 4: There could be a project for creating highly readable Terms of Reference**
133 **documents.**
134

135 If external entities are used in evaluation projects, the terms must be very understandable. In
136 practice this means reading the legal text through, and then creating highly readable document.
137 There can be two or more layers for creating readability, e.g. user-friendly version and the actual
138 legal text (“legalese”).
139

140 Too often we provide terms written only by lawyers, and naturally this text can be very specific and
141 detailed legal text (“legalese”). In practical reality, the legal text can be presented in very user-
142 friendly forms.
143

144 **Good luck!!!!**
145

146 This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
147 opinions. This remains to be seen.

4 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

5 http://ec.europa.eu/yourvoice/index_en.htm, Your Voice in Europe – European Commission

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ANNEX 1

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151 My opinions to the previous and relevant consultations – there consultations were mostly organised
152 by the Commission of the European Union. General page to all consultations – both in English and in
153 Finnish: <http://www.jukkarannila.fi/lausunnot.html>

154

155 EN: Opinion 1: Review of the rules on access to documents

156 http://www.jukkarannila.fi/lausunnot.html#nro_1

157

158 EN: Opinion 2: Schools for the 21st Century

159 http://www.jukkarannila.fi/lausunnot.html#nro_2

160

161 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
162 Safe and Innovative medicines

163 http://www.jukkarannila.fi/lausunnot.html#nro_3

164

165 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

166 http://www.jukkarannila.fi/lausunnot.html#nro_5

167

168 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

169 http://www.jukkarannila.fi/lausunnot.html#nro_6

170

171 EN: Opinion 8: European Interoperability Framework, version 2, draft

172 http://www.jukkarannila.fi/lausunnot.html#nro_8

173

174 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
175 proposal for comments

176 http://www.jukkarannila.fi/lausunnot.html#nro_9

177

178 EN: Opinion 15: Collective Redress

179 http://www.jukkarannila.fi/lausunnot.html#nro_15

180

181 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

182 http://www.jukkarannila.fi/lausunnot.html#nro_17

183

184 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

185 http://www.jukkarannila.fi/lausunnot.html#nro_18

186

187 EN: Opinion 19: Official Acknowledgement by the Commission

188 http://www.jukkarannila.fi/lausunnot.html#nro_19

189

190 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

191 http://www.jukkarannila.fi/lausunnot.html#nro_20

192

- 193 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
194 http://www.jukkarannila.fi/lausunnot.html#nro_21
195
- 196 EN: Opinion 23: Public consultation on the review of the European Standardisation System
197 http://www.jukkarannila.fi/lausunnot.html#nro_23
198
- 199 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
200 http://www.jukkarannila.fi/lausunnot.html#nro_27
201
- 202 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
203 http://www.jukkarannila.fi/lausunnot.html#nro_28
204
- 205 EN: Opinion 30: Internet Filtering
206 http://www.jukkarannila.fi/lausunnot.html#nro_30
207 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
208
- 209 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
210 http://www.jukkarannila.fi/lausunnot.html#nro_32
211
- 212 EN: Opinion 34: REMIT Registration Format
213 http://www.jukkarannila.fi/lausunnot.html#nro_34
214 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
215
- 216 EN: Opinion 35: Exploiting the employment potential of the personal and household services
217 http://www.jukkarannila.fi/lausunnot.html#nro_35
218
- 219 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
220 http://www.jukkarannila.fi/lausunnot.html#nro_37
221
- 222 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
223 http://www.jukkarannila.fi/lausunnot.html#nro_39
224
- 225 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
226 http://www.jukkarannila.fi/lausunnot.html#nro_40
227
- 228 EN: Opinion 41: AT.39398: observations on the proposed commitments
229 http://www.jukkarannila.fi/lausunnot.html#nro_41
230
- 231 EN: Opinion 42: Opening up Education
232 http://www.jukkarannila.fi/lausunnot.html#nro_42
233
- 234 EN: Opinion 43: Publication of extracts of the European register of market participants
235 http://www.jukkarannila.fi/lausunnot.html#nro_43

6 <http://www.cen.eu/> (Accessed 2 July 2012)

7 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

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246

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250 entity making law proposals.

251

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256

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270

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272

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279



8 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.