Evaluation of DG TRADE’s Civil Society Dialogue in order to assess its effectiveness, efficiency and relevance

FINAL REPORT

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Submitted by

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## TABLE OF CONTENTS

**ABSTRACT** ................................................................................................................... 5

1. EXECUTIVE SUMMARY ................................................................................................ 7
   1.1. Recommendations ................................................................................................. 7
   1.2. Conclusions ........................................................................................................... 12

2. THE SUBJECT OF THE EVALUATION ....................................................................... 17
   2.1. Policy context ......................................................................................................... 17
   2.2. The Civil Society Dialogue .................................................................................... 18
   2.3. Civil Society Organisations (CSOs) ..................................................................... 20

3. EVALUATION APPROACH AND METHODOLOGY ......................................................... 21
   3.1. Inception phase ...................................................................................................... 24
   3.2. Interim phase .......................................................................................................... 25
   3.3. Analysis, Judgement and Final Reporting .............................................................. 32
   3.4. Risks and challenges of the evaluation .................................................................. 33

4. EVALUATION RESULTS: INTRODUCTION .................................................................. 34

5. EVALUATION RESULTS: INFORMATION AND COMMUNICATION ........................... 35
   5.1. Conformity with commitment to transparency and good governance............... 35
   5.2. Conformity and contribution to DG Trade's I&C ................................................. 39

6. EVALUATION RESULTS: RELEVANCE ..................................................................... 44
   6.1. Relevance of the CSD objectives ......................................................................... 44
   6.2. Perception of the process within DG Trade and by the participants............... 46
   6.3. Perceived usefulness of the process for the CSOs .............................................. 50
   6.4. Relevance of CSD for DG Trade ....................................................................... 52
   6.5. Raising public awareness on trade issues ......................................................... 55

7. EVALUATION RESULTS: EFFECTIVENESS ................................................................. 58
   7.1. Perceived usefulness of information provided ................................................... 58
   7.2. Reaching target audience ..................................................................................... 59
   7.3. Quality of feedback to the CSOs ...................................................................... 62
   7.4. Influence on trade policy ..................................................................................... 64

8. EVALUATION RESULTS: EFFICIENCY ...................................................................... 68
   8.1. Dissemination of information .............................................................................. 68
   8.2. Allocation of resources ......................................................................................... 70
   8.3. Organisational and administrative procedures; administrative barriers to participation ...................................................... 71
   8.4. Adequacy of recording participants' inputs ......................................................... 74
   8.5. Usefulness of the existing monitoring tools ......................................................... 76
LIST OF FIGURES

Figure 1. DG TRADE’s Civil Society Dialogue – desired intervention logic.......................... 19
Figure 2. Evaluation methods and tools ................................................................................. 23

LIST OF TABLES

Table 1. Evaluation Questions............................................................................................... 22
Table 2. Meetings observed by the evaluators ............................................................. 25

ABBREVIATIONS

CG    Contact Group
CSD   Civil Society Dialogue
CSO   Civil Society Organisation
EC    European Commission
EQM   Evaluation Questions Matrix
EU    European Union
MS    Member State
NGO   Non-governmental organisation
USTR  (the office of) United States Trade Representative
WTO   World Trade Organisation
ABSTRACT

Coffey International Development, Coffey, was contracted to carry out the evaluation of the Civil Society Dialogue (CSD) in DG Trade. The evaluation lasted 8 months, from December 2013 to July 2014. There were four specific objectives for this evaluation:

1. To evaluate the extent to which the CSD process addresses the objectives that have been set for it and delivers results.
2. To evaluate the relevance of the process, and the effectiveness of the current implementation procedures.
3. To assess the efficiency of its organisation, use of resources, and monitoring mechanisms.
4. To make recommendations with a view to improving and renewing the approach and process.

The methodology deployed for this evaluation, included assessment of CSD meetings, online surveys of Civil Society Organisations and DG Trade managers, in-depth qualitative interviews, reviews of similar processes elsewhere in the European Commission, and benchmarking of external organisations (the WTO, USTR, the Danish Government’s MindLab and the UK Cabinet Office).

The evaluators formulated key recommendations and best practice options for consideration by the Directorate-General for Trade to enhance the CSD.
INTRODUCTION

This document is the Final Report of the Evaluation of DG Trade’s Civil Society Dialogue (CSD). The report is submitted by Coffey to the European Commission’s Directorate General for Trade. Coffey was contracted as together with Deloitte it holds the European Commission Framework Contract, RTD-L05-2010, for the evaluation of information and communication policies and products. The main aim of the evaluation is the assessment of the effectiveness, efficiency and relevance of the CSD with a view to making recommendations for the future.

The report consists of the following main sections:

- Executive Summary provides conclusions to the evaluation questions posed by DG Trade in the Terms of Reference for the evaluation. It also provides recommendations for the development of the CSD. In addition, the Executive Summary is provided as a separate document in English, French and German.
- Section 2 presents the context within which the CSD operates and provides a brief introduction to the subject of the evaluation, namely the Civil Society Dialogue in DG TRADE;
- Section 3 puts the evaluation in context, summarising its purpose and approach, and providing an overview of the main methods used to collect and analyse data;
- Section 4 demonstrates the main findings of the evaluation, structured around the evaluation questions;
- Sections 5-8 present overall findings and detailed conclusions regarding the CSD’s performance and the evidence on which these are based, ordered by evaluation theme and the particular Evaluation Questions.

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1. EXECUTIVE SUMMARY

Résumé en français  Zusammfassung in Deutsch

The Civil Society Dialogue has provided an open forum for civil society to meet with DG Trade for the last 15 years. The longevity of this process confirms the shared interest of DG Trade and civil society. The Lisbon Treaty underpins the role of the Civil Society Dialogue. The Dialogue provides a transparent structure for regular meetings between DG Trade and civil society. This approach is unique within the Commission. Since January 2008, there have been circa 165 Civil Society Dialogue meetings (with an average of 26 meetings per year), involving circa 1750 participants. The frequency and timing of meetings is considered by all to be appropriate.

In December 2013, with European Parliament elections and a new Commission in sight, DG Trade commissioned an evaluation of the Civil Society Dialogue (CSD). As well as assessing the on-going relevance, effectiveness and efficiency, the main goals of the evaluation were to provide DG Trade with evidence to support decisions on how to manage the CSD in the future. The evaluation considered evidence from inside the Commission, Civil Society Organisations (CSOs) USTR, WTO, and the UK and Danish governments.

The following section provides recommendations to guide the strengthening of the CSD in the future. In order to deliver change, it is necessary for decisions to be made with regards to ambitions and the resources available to meet these ambitions. For this reason, we recommend to define the overall strategic approach in a first step. This is then followed by conclusions which provide a summary answer to DG Trade’s evaluation questions.

1.1. Recommendations

There are three main recommendations to DG Trade.

1. DG Trade needs to define what it wants to achieve with the Civil Society Dialogue (CSD).

The evaluation raises questions as to whether the CSD could and should be transformed so that it facilitates debate on trade issues and has clear inputs into policy making. There are a number of aspects, which currently limit the contribution made by the CSD, relating to:

- Goals / strategic intent
- Content available for discussion
- The internal need for the CSD / internal processes to capture outputs
- Available expertise around the table
- The monitoring systems in place

The evaluation has also identified a number of best practices, which could be adopted to enhance the CSD. However, decisions on the future of the CSD must be aligned with agreement at senior levels on what the DG wants to do with the CSD.
Key questions for discussion include whether the DG wants to:

- Retain the CSD as an information relay and / or debate with CSOs
- Release more detailed / content through the CSD, for example negotiated texts
- Use the CSD to improve policy
- Use the CSD to increase visibility of EU Trade
- Visibly engage senior staff in the process
- Invest more or re-prioritise resources to enhance the CSD

2. DG Trade needs to reset the aspirations for CSD in-line with its strategic intent.

The CSD fulfils its mandate as described in the Lisbon Treaty, but current aspirations\(^1\) goals do not match reality. The CSD is an information relay. Discussion is limited and there is no real debate. The CSD does not currently generate clear outputs to inform policy, consequently there is a mixed picture of satisfaction among CSOs. Currently, the CSD provides a forum to allow the DG to hear CSO views, it is less able to address concerns and improve policy and there are question marks over transparency. By answering questions on what the DG really wants, it should be possible to define aspirations that better meet DG goals for the CSD.

3. DG Trade needs to set clear and specific objectives from the CSD process and CSD meetings.

Specific objectives will relate to what the DG wants to achieve from each meeting, which should link to what the DG wants to achieve from the CSD as a whole. Objectives should support the achievement of clear and visible CSD outputs. In-line with good practice, objectives should be specific, measurable, accurate, realistic and time-bound (SMART). It is recommended that CSD objectives are then tied to organisational goals so that it is clear how the CSD contributes to the work of the DG and it is possible to measure the progress achieved by the CSD in the timeframe set.

<table>
<thead>
<tr>
<th>Example meeting objectives</th>
<th>Definition of the need for the meeting, the intended outputs, the level of importance of generating these outputs and the process for handling outputs in advance of the meeting.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Publishing a number of key questions / issues for discussion / areas where CSOs could add value in advance of the meeting.</td>
</tr>
<tr>
<td></td>
<td>Identifying and inviting new / critical stakeholders representing different insights.</td>
</tr>
<tr>
<td></td>
<td>Consideration of need for external expert input to stimulate discussion / 'Hearing CSO views, addressing concerns, improving policy-making and improving transparency and accountability'</td>
</tr>
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</table>

\(^1\) 'Hearing CSO views, addressing concerns, improving policy-making and improving transparency and accountability'
Based on decisions on 1 – 3, we recommend the following best practices / options to enhance the CSD.

1. **The CSD as a means to communicate and inform**

   Different types of meetings to meet different needs, which could include:
   - Organising an occasional large-scale event to respond to the call for more fundamental debates, similar to the WTOs public forum.
   - Smaller policy discussion meetings involving informed participants who can give inputs.

2. **The CSD as a means to generate inputs to policy**

   Using structured / innovative ways to facilitate debate

   Information-relay type meetings are limited in their ability to generate policy-type inputs. Debates do not just happen. There are many ways to facilitate discussion, including:
   - Having an outcome in mind at the start
   - Introducing concrete ideas in advance
• Challenging underlying assumptions about a particular area
• Involving the stakeholders that are really critical to the debate
• Ensuring a diversity of experience among participants

**Define the process for how CSD outputs will feed into policy**

There is currently no clear channel for the take-up of CSD outputs inside the DG. CSD outputs need to be captured by existing, new or ad hoc procedures. Consideration could be given to:

• Integrating CSD discussions into the Impact Assessments;
• Facilitating debates alongside or following the consultation process;
• Calls and guidance for position papers linked to specific inputs in the pre-negotiation phase;
• Other ad hoc routes provided these are spearheaded from the top (Director General or Commissioner) to confirm their importance to internal and external stakeholders.

**Address current perceptions on use of CSD outputs**

To ensure that the opportunity to input to policy / negotiations is seized there is a need to change current perceptions that this is not possible. Possible areas for the DG to focus include:

• Clearly articulating that inputs will be taken into account and how.
• Creating a sense that the CSD is where the discussion that 'really counts' takes place. This could mean ensuring that information / discussion is in some way privileged and not available elsewhere.
• Ensuring the visible and active participation of senior staff at critical points. This will reassure participants that their comments are being heard by those with the authority to act upon them.

**3. Operational aspects of the CSD**

**Re-define the Terms of Reference of the Contact Group**

There is a need for greater clarity on membership of the Contact Group and its role, as well as mechanisms to ensure visibility and transparency. Consideration could be given to:

• Rotating membership of the group
• The Commission taking chairmanship of the group
• The Commission asking CSOs to make inputs to the Contact Group
• Posting Contact Group minutes on-line
Review the approach to feedback and monitoring

The format and application of the current monitoring system provides limited insights. Consideration could be given to replacing the current focus on gathering feedback on each meeting, with an annual review, including:

- Initial discussion with the Contact Group
- A simple on-line questionnaire, with the link emailed to all participants
- A structured discussion with CSD participants (internal and external)
1.2. Conclusions

1.2.1. How does the CSD fit into DG Trade’s overall commitment to transparency and good governance?

The CSD reflects a commitment to transparency, but does not contribute to transparency on the way that policy is developed, as described in the CSD objective on improving transparency and accountability. The CSD process is to a great extent aligned with principles of good governance, but there is no clear channel for CSD outputs to feed in the work of the DG. Also, there is a lack of clarity concerning the membership of the Contact Group and transparency with regards to what the Group does.

1.2.2. How does the CSD fit in and contribute to DG Trade’s information and communication (I&C) on trade policy?

There is some fit between the CSD and the DG’s approach to information and communication, but it is concluded that the CSD does not make a strong contribution to meeting information and communication goals expressed in the Strategy. Not all target groups are covered and their needs are not well met. Key messages are partially communicated. Communication on TTIP shows greatest alignment to the overall I&C approach. It is noted that, for the moment, the CSD whilst being a communication channel is not intended as an instrument to meet specific I&C goals.

1.2.3. Do the objectives of the CSD remain relevant?

The CSD does not have specific objectives, rather it has goals. Goals are broad general intentions that cannot be validated. Objectives are narrow and precise. Good practice states that objectives should be SMART (Specific, Measureable, Accurate, Realistic and Time-bound). We suggest that some of the problems with the CSD could actually be resolved if the process had a set of clear objectives to provide a steer both to staff and to CSOs. However this evaluation question requires an assessment of the stated ‘objectives’ and we conclude that objectives are only partially relevant today.

1.2.4. How is the process perceived within DG Trade and by the participants (number of meetings, topics, quality of information and exchange of views, involvement of EC representatives?)

There are mixed views on the CSD within DG Trade and within Civil Society. This is a timely, well organised opportunity for the two sides to meet on a regular basis in an open format. Meetings involve providing information, and questions and answers on that information. This is appreciated on both sides. Business organisations are most strongly in favour of the process, but there seems to be a lack of commitment on the side of the DG and also NGOs because of the general nature of the exchange that takes place. This leads to several key questions. Can the dialogue process be turned into a useful debating forum which achieves maximum added value for the Commission and a real sense of contribution by CSOs? Is this desirable within the EU institutional framework?
1.2.5. *In what ways do CSOs find the process useful? What are its strengths and weaknesses? Has it fulfilled stakeholders’ expectations*

The evaluation provides evidence to confirm how CSOs find the CSD process useful and their perceptions of strengths and weaknesses. Stakeholder expectations are partially met, and those who engage in the process see its value, but there are underlying frustrations. When asked what might reduce the appeal of the process, the mismatch between the desire to contribute and the perceived lack of influence comes to the fore as do the resource implications for some CSOs. This raises questions as to what if anything can be done to allow expectations to be better met.

1.2.6. *In what ways is the CSD relevant for DG Trade?*

The Civil Society Dialogue is relevant for DG Trade, but its usefulness could be increased. Managers believe in the political and operational importance of listening and being seen to listen to civil society, but the current process does not sufficiently harness their interest. Consequently they do not drive the process forward. Perhaps this relates to a keen awareness of the shortcomings of the process, or it reflects a focus on how to manage CSD discussions, but not on how to maximise the usefulness of this interaction for the DG. The CSD allows the DG to have a structured and managed interface with civil society. This is an important outreach activity, which can also provide practical benefits to help staff members to better understand specific concerns / issues that arise and, when relevant, to take this into account in the way that they develop their work.

1.2.7. *Does the CSD process play a role in raising public awareness on trade issues and policies and in encouraging CSOs and their constituencies to participate in discussions with the European institutions?*

The CSD does not play a role in raising public awareness on trade issues and policies. The dialogue facilitates the participation of CSOs in discussions with the European Commission, but not other European institutions, but there are currently no actions to encourage new CSOs / constituents to take part.

1.2.8. *To what extent is the information provided by DG Trade at the CSD meetings perceived as new and useful in keeping CSOs informed about the development of policies, progress and state-of-play in trade negotiations?*

The answer to this question has been covered by Evaluation Questions 4 and 5, which also concern the quality of information and the usefulness of CSD process. The survey indicates a lower level of satisfaction with the content of CSD meetings and feedback from those who attend meetings is that it is often possible to find the information elsewhere or that the information is already to some extent known because it is of a very general nature. DG Trade’s negotiating partners do not always have the same attitudes towards confidentiality as the DG.

1.2.9. *Is the CSD reaching its target audience adequately? Are the tools and channels used appropriate?*

The DG’s current approach to reaching its target audience is adequate for the CSD’s information update sessions. The DG does not take proactive steps to increase participation.
in the CSD. **Those who are interested and aware of how to** keep up-to-date with DG Trade negotiations and policies know where to look for information on upcoming meetings. NGOs are reported not to be adequately represented, yet it seems that some are disaffected because their expectations as regards the use of their inputs cannot be met. Current tools and channels are **appropriate to the current scope of the CSD**. The meeting format is appreciated as a rare opportunity for face-to-face interaction with EC officials. The website provides an accessible information repository for meeting data, even if this is not always up to date.

**If the DG wants a more useful and informative debate** then the current approach is not adequate to reach the more specialised target audience required. This is the key question to be answered before deciding on alternative channels and tools, which should be selected to suit the purpose of the exercise. There is some talk of taking discussions on-line/web-streaming, which current participants find interesting, yet they do not feel that location is an issue. It seems likely, but it is not possible to confirm, that this alternative approach would not lead to a significant increase in participation, because it is the content of the CSD that is its biggest limitation not the format.

**1.2.10. How do participants rate the feedback offered by DG Trade about the ways in which their views are taken into account?**

From the evidence, there are very **mixed levels of satisfaction** with feedback received from DG Trade. A sizeable proportion of participants seem to be dissatisfied with this element. It is difficult to quantify the level of feedback on how CSO views are taken into account, because for the most part there seems to be an acceptance that views are not really taken into account. Some exceptions to this were identified and positive examples provided. Those representing NGOs suggest a level of disaffection from the process because of a belief/experience that inputs will not really be taken into account. CSD meetings are standalone events. Questions posed in a particular session are answered in that session because the next meeting will be on a different topic, involving different EC staff and possibly different CSO participants.

**1.2.11. How effective is the process in providing participants with a forum in which to present their ideas and position papers for influencing trade policy?**

The CSD is **not a very effective process to allow CSOs to present their ideas**, this assertion is confirmed by the fact that there is no real discussion in meetings and most participants do not speak. These are **information-giving sessions** where participants can ask questions on the presentation made. It could be assumed that an effective forum would result in a lot of discussion between the Commission and different CSOs. As highlighted in other conclusions, the type of information provided by the Commission is considered by CSOs to be **quite general**. Furthermore there is no internal procedure to take CSD inputs into account, which reduces the potential for influence. Conclusions on this point do not cover TTIP, for which an alternative approach has been developed.
1.2.12. How is the information provided by DG Trade through the CSD and Contact Group disseminated by the CSOs to their constituencies?

Most information dissemination on the CSD takes place electronically. This supports the need for information to be made available on-line and in electronic versions; not just as paper hand-outs in meetings. Most participants at CSD meetings are forwarding some information to their constituencies, at least some of the time. This is one of the benefits of the typical profile of a CSD meeting attendee, who is a representative of a wider group of interests / organisations; a type of multiplier.

Contact Group members also forward information to their member organisations, according to its perceived relevance. There are differences of approach to this with some being more systematic than others in their dissemination actions. There are also differences in opinion on the need to do so, with a few members seeing their role as providing information to the Commission and not the other way around, despite this being part of the remit of the Contact Group. Despite information on the CSD web that every CSO is able to choose one Contact Group member as their contact group, for the most part this does not seem to be happening, unless a CSO is automatically represented by the Contact Group member because its organisation belongs to that member’s network.

1.2.13. Are the resources allocated to the process commensurate with its objectives?

It is concluded that the resources are sufficient for what the CSD is, but they probably do not reflect its aspirations. The current process is focussed on relaying information to mainly Brussels-based CSOs who are not dependent on DG Trade for resources to enable them to attend. There is no real promotion of the CSD or efforts to attract additional CSOs with more specialist insights to the process. Given the tiny team working on the CSD, it seems that additional actions would most likely require additional human resource, which may not be possible in the current tight budgetary context. This is a low-cost model which fits with the call for budget streamlined communications described in the Communication Strategy.

1.2.14. To what extent do the existing organisational and administrative arrangements lead to an efficient consultation process? Are there administrative aspects that act as a barrier to participation?

Based on internal and external views, it can be concluded that existing organisational arrangements are efficient with regards to ensuring that an appropriate and timely number of meetings are held and that these are well organised and chaired. However, there are several features of the way that the CSD is handled inside the DG that are likely to restrict or limit its impact, including lack of specific objectives, internal rules or guidelines for how to make use of the CSD and its inputs; the fact that the CSD is not required to provide inputs to a DG procedure and that there are other mechanisms to gather feedback / which facilitate more in-depth discussion. At the same time there is a sense that CSD inputs do not always bring new insights.
1.2.15. To what extent is the way DG Trade’s inputs and participants’ contributions are recorded adequate?

The way that DG Trade’s input and participants’ contributions are recorded appears to be adequate. There may be differences of opinion on this point among CSOs, but the fact that there was only one unsubstantiated voice of criticism, suggests it is not an area of significant concern. This is also confirmed by our observations at CSD meetings. Minutes from the Contact Group are not posted on-line, which does not support transparency.

1.2.16. Is the information provided by existing monitoring tools useful? How can this information be fed into the process?

The information provided by existing monitoring tools has limited usefulness. The main mechanism to collect data relates to meeting questionnaires, which are used at every meeting and give very limited insights. An annual review / discussion with participants at a CSD meeting may be a better way of collecting insights into the process and engaging with CSOs on how to improve the process / the extent that they are satisfied. There are discrepancies in the way that data is collected and reported, relating to continued use of database systems that are not fully aligned to collection, for example in the labeling of participant categories.
2. THE SUBJECT OF THE EVALUATION

2.1. Policy context

The European Union’s trade policy is based on a fundamental premise, stipulated in Article 131 of the EC treaty: to “contribute, in the common interest, to the harmonious development of world trade, the progressive abolition of restrictions on international trade and the lowering of customs barriers”.

DG Trade is responsible for managing trade and investment relations with non-EU countries through the EU's trade and investment policy, also referred to, in the EU Treaties, as common commercial policy. This policy has been exclusively under the EU's mandate since the Rome Treaty, which means that only the EU as such –and not individual Member States– can legislate on trade matters and conclude international trade agreements.

DG Trade services are responsible for negotiating bilateral and multilateral trade agreements, ensuring that the rules agreed upon are applied and maintaining close working relationships with the WTO and other multilateral institutions.

The creation of the CSD by DG Trade in 1998 came at a time when NGO activity and social movements caught the attention of the media with the demonstrations first at the global trade and WTO summits (in Seattle, Sydney, and Davos), and subsequently also at the European summits (in Nice and Göteborg)\(^2\). The protests were parallel with the widely perceived issue of “democratic deficit” in the EU.

Since the early 2000s, a number of policies were put in place to highlight the need of closer engagement of civil society stakeholders.

The White Paper on Governance\(^3\) (2001) highlighted the need for better involvement of civil society in consultation processes. In December 2002, the EC adopted the General principles and minimum standards for consultation of interested parties by the Commission\(^4\). They require, in particular, that:

- the content of consultation is clear;
- relevant parties have an opportunity to express their opinions;
- the Commission publishes consultations widely in order to meet all target audiences,
- participants are given sufficient time for responses, and
- acknowledgement and adequate feedback is provided.

In addition to the policy of open governance, the Commission has identified Communication as one of its key strategic objectives. In 2005 the Action Plan to Improve Communicating Europe was published. Its key objective was to ensure more effective communication about Europe and one of the Plan’s actions was to enhance dialogue and

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\(^3\) COM(2001)428

transparency by promoting consultation procedures and making sure that the results and feedback from the Commission’s public consultations are widely publicised. The same year saw the publication of the *Plan-D for Democracy, Dialogue and Debate*\(^5\) which was followed by the 2006 *White Paper on European Communication Policy*\(^6\) that emphasized the importance of an enhanced debate and dialogue, a “citizen-centred communication” through which the EU citizens can “be confident that the views and concerns they express are heard by the EU institutions”.

The *Lisbon Treaty* (Art. 11 (1 & 2), Title II ‘Provisions on democratic principles’) introduced the general principles that interested parties should be consulted and that a dialogue be maintained with civil society and representative organisations. It establishes that the work of the European institutions must be transparent and in particular that their activities should be fully publicised:

“**TITLE II: PROVISIONS ON DEMOCRATIC PRINCIPLES**

**ARTICLE 8 B**

1. *The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action.*

2. *The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society.*

3. *The European Commission shall carry out broad consultations with parties concerned in order to ensure that the Union’s actions are coherent and transparent."

The *European Transparency Initiative*\(^7\) (2008) and the establishment of the *Transparency Register* (2011)\(^8\) further reinforced these principles.

**2.2. The Civil Society Dialogue**

The Commission recognises that global trade negotiations can have far reaching implications for wider society, including in relation to growth, employment, the environment and development. This reality drives the need for account to be taken in the evolution of trade policy. Yet the DG’s overarching goal is to ensure that trade policy is based on consultations with all parts of European civil society, and that this process is both transparent and accountable.

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\(^7\) COM(2008)323

DG Trade’s Civil Society Dialogue (CSD) process is intended to provide a regular and structured approach to discussing EU trade issues with civil society organisations. CSD discussions take place in face-to-face meetings where Commission officials from DG Trade and other DGs working in policy areas relevant to a particular policy negotiation.

DG Trade has set four main objectives for its Civil Society Dialogue (CSD):

1. **Consult widely in the framework of a confident working relationship**
2. **Address civil society concerns on trade policy**
3. **Improve EU trade policy-making through structured and qualitative dialogue**
4. **Improve transparency and accountability**

The figure below presents the desired intervention logic of the CSD process. The goal of this evaluation is to verify the extent to which the logic holds true in practice.

**Figure 1. DG TRADE’s Civil Society Dialogue – desired intervention logic**

- **Outputs**
  - Consultation and exchange of views with civil society on EU trade issues
  - Improved transparency and accountability on behalf of the Commission

- **Outcomes**
  - To promote a better understanding of EU trade positions among CSOs.
  - To promote a better understanding of civil society concerns on EU trade policy

- **Impacts**
  - To improve EU trade policy-making
  - To enhance public understanding of how EU trade policies work

- **Instruments**
  - Meetings: General meetings on trade policy issues, Meetings on bilateral and multilateral trade negotiations, Meetings with the General for Trade, Sustainability Impact Assessment meetings, Contact Group meetings
  - Other instruments: CSO position papers, Website and information provision on EU trade negotiations, CSO views and feedback to DG Trade, Meeting minutes and presentations
2.3. Civil Society Organisations (CSOs)

There is no commonly agreed or legal definition of the term “Civil Society Organisation”. The 2002 General principles and minimum standards for consultation of interested parties by the Commission\(^9\) emphasize the specific role of CSOs as in closely linked to the fundamental right of citizens to form associations in order to pursue a common purpose, as highlighted in Article 12 of the European Charter of Fundamental Rights\(^10\). It must be noted, however, that in its consultation policy the Commission does not make a distinction between CSOs or other types of interest groups. The Commission consults “interested parties”, which comprise all those who wish to participate in consultations run by the Commission.

Civil society organisations (CSOs) that wish to participate in DG Trade’s CSD must be trade-related, not-for-profit and based in the EU. They are required to enlist in the Transparency Register (TR), which has been set up and is operated by the Secretariat General of the European Commission and the European Parliament. The TR serves the purpose of registration and monitoring of organisations and self-employed individuals engaged in EU policy-making and policy implementation; it is a part of the commitment of EU institutions to the integrity and openness of their activities with civil society. In signing up to the register, organisations are asked to accept the Code of Conduct\(^11\) and to provide information about their activities (including mission, sources of funding and representation).

Examples of typical CSO organisations include:

- Social, development and environmental NGOs
- Research institutes and academia
- Trade unions, employers and associations
- Chambers of commerce
- Consumer, business and trade associations

DG Trade maintains a Civil Society Dialogue database of organisations that registered in the Transparency Register and attended any of the CSD meetings. As of mid-May 2014, 359 CSOs were registered in the Civil Society Dialogue database.

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\(^9\) COM(2002)704

\(^10\) “Everyone has the right to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters”

3. EVALUATION APPROACH AND METHODOLOGY

The evaluation provides feedback on how the CSD is working in practice and what could be done to further improve the process. There are four specific objectives for this evaluation:

- To evaluate the extent to which the civil society dialogue process addresses the objectives that have been set for it and delivers results.
- To evaluate the relevance of the process, and the effectiveness of the current implementation procedures.
- To assess the efficiency of its organisation, use of resources, and monitoring mechanisms.
- To make recommendations with a view to improving and renewing the approach and process.

The objectives set translate into 17 more specific evaluation questions, which are listed overleaf.

DG Trade’s Civil Society Dialogue is now in its 16th year of operation. This is the second evaluation of the dialogue process. The first evaluation reported back to the Commission in 2007. Some seven years on, this evaluation is intended to allow DG Trade both to take stock of the Dialogue process and to identify ways to improve the transparency and communication between its actors. With this in mind, the overall aim of the evaluation is to assess whether the Civil Society Dialogue’s strategy and purposes remain adequate.

Our assessment of the evaluation questions is that these focus for the most part of the ongoing and past performance of the CSD. The main task of this evaluation is to answer these questions. However, there is a keen interest to go beyond an assessment of what has happened in the past to the identification of viable ideas that could strengthen the CSD in the future. Indeed it is noted that the 1st evaluation of the CSD in 2007 already provided an initial assessment of some of the issues listed below.

Sections 3-6 of this report are structured around the evaluation question areas, as listed below.
### Table 1. Evaluation Questions

<table>
<thead>
<tr>
<th>Evaluation Questions</th>
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<tbody>
<tr>
<td><strong>I &amp; C</strong></td>
</tr>
<tr>
<td><strong>EQ1</strong>: How does the CSD fit into DG Trade’s overall commitment to transparency and good governance?</td>
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<tr>
<td><strong>EQ2</strong>: How does CSD fit in and contribute to DG Trade's information and communication on trade policy?</td>
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<tr>
<td><strong>EQ3</strong>: Do the objectives of the CSD remain relevant?</td>
</tr>
<tr>
<td><strong>EQ4</strong>: How is the process perceived within DG Trade and by the participants: number of meetings, topics, quality of information and exchange of views, involvement of Commission representatives?</td>
</tr>
<tr>
<td><strong>EQ5</strong>: In what ways do CSOs find the process useful? What are its strengths and weaknesses? Has it fulfilled stakeholders’ expectations?</td>
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<tr>
<td><strong>EQ6</strong>: In what ways is the CSD relevant for DG Trade?</td>
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<tr>
<td><strong>EQ7</strong>: Does the CSD play a role in raising public awareness on trade issues/policies and in encouraging CSOs &amp; their constituencies to participate in discussions with the EU institutions?</td>
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<tr>
<td><strong>Relevance</strong></td>
</tr>
<tr>
<td><strong>EQ8</strong>: Is the information provided by DG Trade at the CSD meetings perceived as new and useful in keeping CSOs informed about the development of policies, progress and state of play in trade negotiations?</td>
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<tr>
<td><strong>EQ9</strong>: Is the CSD reaching its target audience adequately? Are the tools &amp; channels used appropriate?</td>
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<tr>
<td><strong>EQ10</strong>: How do participants rate the feedback offered by DG Trade about how their views are taken into account?</td>
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<tr>
<td><strong>EQ11</strong>: How effective is the process in providing participants with a forum in which to present their ideas and position papers for influencing trade policy?</td>
</tr>
<tr>
<td><strong>Effectiveness</strong></td>
</tr>
<tr>
<td><strong>EQ12</strong>: How is the information provided by DG Trade through the CSD &amp; CG disseminated by the CSOs to their constituencies?</td>
</tr>
<tr>
<td><strong>EQ13</strong>: Are the resources allocated to the process commensurate with its objectives?</td>
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<tr>
<td><strong>EQ14</strong>: Do existing organisational &amp; administrative procedures result in an efficient consultation process?</td>
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<tr>
<td><strong>EQ15</strong>: Are there administrative aspects that act as a barrier to participation?</td>
</tr>
<tr>
<td><strong>EQ16</strong>: Is the way that DG Trade’s input and participants’ contributions are recorded adequate?</td>
</tr>
<tr>
<td><strong>EQ17</strong>: Is the information provided by existing monitoring tools useful? How can this information be fed into the process?</td>
</tr>
<tr>
<td><strong>Efficiency</strong></td>
</tr>
</tbody>
</table>
The following sections describe the main methods and tools that were used for the purpose of evaluating the CSD in DG Trade. These are presented in accordance with the three main phases of the project, namely:

- Inception,
- Data collection & analysis,
- Analysis, judgement and final reporting

The figure below summarises the stages and the tools and methods deployed in this evaluation. This is then followed by a detailed description of each phase in the subsequent paragraphs.

Figure 2. Evaluation methods and tools
3.1. Inception phase

This section presents the work carried out in the inception phase. This first phase of the evaluation was devoted to validating and refining the suggested evaluation questions and finalising the proposed methodology. It entailed the following main tasks:

<table>
<thead>
<tr>
<th>Task</th>
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<tbody>
<tr>
<td>Kick-off meeting</td>
</tr>
<tr>
<td>Initial desk research</td>
</tr>
<tr>
<td>Familiarisation interviews with DG TRADE officials</td>
</tr>
<tr>
<td>Methodology refinement</td>
</tr>
<tr>
<td>Inception report</td>
</tr>
</tbody>
</table>

The **kick-off meeting** took place on the 18 December 2013 and served primarily as a means to exchange views on the expectations and needs of DG TRADE and the evaluation team, and to clarify the team’s understanding of the work to be undertaken.

With a view to enriching the design of data collection tools, the evaluation team carried out an initial review of information available on the consultation pages of the **DG TRADE website**\(^\text{12}\). This included the following aspects:

- The overall content of the website (insofar as the site is critical to transparency of the process);
- Minutes of previous meetings held in 2012;
- CSD Annual Activity Reports for 2010 and 2011;
- The Transparency Register

In addition, the evaluators took account of the minutes of five recent Contact Group meetings held in 2012 and 2013\(^\text{13}\), as provided to the evaluators by DG TRADE. Furthermore, six **familiarisation interviews** were carried out with DG TRADE offices in December 2013 and January 2014.

With an enhanced understanding of DG TRADE’s objectives and priorities for the evaluation the evaluation team developed all data collection tools required for the ensuing data collection and analysis. All of the draft data collection tools were provided to DG Trade in earlier progress reports. The data collection tools drew directly from the **Evaluation Questions Matrix**, which was developed to show the types of issues that need to be addressed to answer the evaluation questions.

To mark the end of this initial phase of the evaluation, the results of the inception phase were summarised in a succinct Inception Report, which was submitted to the DG TRADE in January 2014.


3.2. Interim phase

The second phase of the evaluation was devoted to conducting the main bulk of the data gathering to provide evidence to allow the evaluation team to answer the evaluation questions set. The following data collection tools were used during this phase:

<table>
<thead>
<tr>
<th>Data Collection Tools</th>
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</thead>
<tbody>
<tr>
<td>CSD meetings assessment</td>
</tr>
<tr>
<td>On-line surveys</td>
</tr>
<tr>
<td>In-depth qualitative interviews</td>
</tr>
<tr>
<td>Review of other EC stakeholder processes</td>
</tr>
<tr>
<td>Benchmarking of external organisations</td>
</tr>
<tr>
<td>Interim Report</td>
</tr>
</tbody>
</table>

3.2.1. CSD meetings assessment

The assessment of CSD meetings took into account several sources of data, including the views of the Contact Group, staff members within DG Trade interviewed during the first phase of the evaluation and the survey of registered participants. In addition, a more specific focus on actual CSD meetings was carried out through:

a) Evaluators’ participation in CSD meetings

The evaluation team took an observer role in four CSD meetings. A meetings observation sheet was used by each member of the evaluation team, notes were taken and subsequent discussions were held with members of DG Trade staff responsible, to ascertain their perspectives on the meeting.

**Table 2. Meetings observed by the evaluators**

<table>
<thead>
<tr>
<th>No.</th>
<th>Date</th>
<th>Subject of the CSD meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>13/02/14</td>
<td>EU-China trade and investment relations: state of play</td>
</tr>
<tr>
<td>2.</td>
<td>20/02/14</td>
<td>Meeting of the CSD Contact Group</td>
</tr>
<tr>
<td>3.</td>
<td>07/04/14</td>
<td>EU integrated approach to a responsible trading strategy for minerals from conflict areas</td>
</tr>
<tr>
<td>4.</td>
<td>05/05/14</td>
<td>Trade Sustainability Impact Assessment (Trade SIA) on the Trade in Services Agreement (TiSA), Draft Inception Report</td>
</tr>
</tbody>
</table>

Whilst the content of each CSD meeting is highly specific and could not be assessed as such, our participation the meetings helped to give different members of the evaluation team a better understanding of how the CSD functions in practice. Given the high level of specificity of these meetings, it became clear that, with the exception of the Contact Group meeting, CSD meeting observation helped to confirm the existing approach rather than providing a source of inspiration for possible alternative approaches.
b) An updated meeting monitoring questionnaire, collection and analysis of results.

Questionnaires were collected following the meetings attended (with the exception of the Contact Group meeting) and responses were uploaded and integrated into our survey software to facilitate their analysis. 72 responses were received to the meeting questionnaire. The number of responses was lower than the number of attendees at the CSD meetings reflecting the reality that many were not willing to complete the survey, despite a specific request to do so by the European Commission. The results from the CSD meeting questionnaire were provided in a separate document to DG Trade.

3.2.2. On-line surveys of registered CSOs and Senior and Middle Managers

In order to capture the viewpoints of CSOs and middle and senior managers in DG Trade, two surveys were designed and put on-line to facilitate their completion. The surveys were designed in liaison with DG Trade to ensure the appropriateness of questions. The surveys were put launched on 5 February and the CSO registered participant survey was closed on 22 April 2014. There were 162 responses to the survey of registered participants. The survey of senior and middle management yielded very limited number of responses (seven). It is understood that staff had been asked to complete a student’s survey on a similar topic at the same time as the launch of the evaluation survey. This may have caused confusion and resulted in staff responding to the unofficial survey and not the evaluation survey. Whilst several reminders were sent to staff within the DG, these did not manage to stimulate additional responses.

3.2.3. In-depth qualitative interviews

In-depth qualitative interviews were conducted to complement the findings from other sources of evidence, mainly the survey of registered CSO participants and the planned focus groups. Interviews were carried out using discussion guides to ensure comparability of responses. Three types of interviews were included in the programme:

a) Interviews with the Contact Group

Interviews with the Contact Group were intended to explore in more detail the dynamics of the Group, to allow a better understanding of how the group has been and is functioning with regards to content and organisational aspects, and what current members perceive to be the pros and cons of their involvement. In addition, Contact Group members were invited to give feedback on the wider CSD process.

Individual interviews were conducted with each member of the Contact Group. Interviews were carried out over the telephone over the period February to June. This staggered approach allowed us to take account of insights from other sources of evidence gathered during this period in the interviews.
Interviews were conducted using a semi-structured questionnaire. In each case, an interview report was written up. Findings were integrated into a contact group report for later integration with other evaluation findings.

b) Interviews with organisations that have stopped participating in the CSD.

Typically it is necessary and most relevant to collect evidence from individuals and organisations that are actively engaged with the subject of an evaluation (the CSD), because they are most likely to provide rich insights. However, this approach makes it difficult to detect issues which may reduce participation in the CSD. Therefore, we contacted a sample of organisations, which used to regularly attend CSD meetings and had stopped participating in the last 2-3 years.

Given the lack of current involvement in the CSD, it was likely to be difficult to engage potential interviewees in the evaluation. Circa 15 organisations were contacted by email to request an interview; reminder emails were sent out. Four organisations agreed to take part.

Due to the small sample size, the feedback given was understood as having the potential to flag possible issues or to provide further insights. It did not provide a substantial or comprehensive alternative viewpoint. However, the findings from these interviews are included, where relevant, in Sections 3-6 (Evaluation findings).

c) Interviews with organisations that are not members of the Contact Group

These interviews were conducted to provide an alternative view in recognition of the likely element of bias in the interviews with the Contact Group. Members have privileged insights in comparison to individuals whose experience is limited to participation in CSD meetings. In addition, as there have been limited changes in the membership of the Contact Group in recent years. The interviews suggested that a certain status quo has been reached and this increased the likelihood that members’ views have converged on certain points with regards to the assessment of the CSD.

3.2.4. Review of other EC stakeholder processes

The evaluation included an investigation into the consultation processes of other DGs: DG AGRI, DG ENV, DG EAC, and DG MARKT, which have either participated in the CSD or have their own stakeholder consultation processes. These interviews provided an overview of other EC processes typically used for engaging with stakeholders, including:

- On-line stakeholder consultation processes either as the main mechanism for stakeholder input or as one of the tools used
- Expert / advisory groups
- Stakeholder platforms
• Web-based dialogues

The on-line stakeholder consultation process: is a standard EC process, used across the European Commission, including by DG Trade. Consultations are highly transparent with all inputs made available on-line and the opportunity for organisations to provide substantial written input. Yet they are far less supple than DG Trade's current dialogue meetings' approach. CSD meetings allow organisations to come with their own questions, a bottom-up approach, and not to be bound to provide responses to questions posed by the DG. The meeting is the most direct opportunity to interact with the European Commission staff responsible for the policy area. Furthermore, the possibility to submit a position paper to DG Trade as part of the CSD allows for more substantial inputs to be provided.

The current approach to gathering feedback on the TTIP negotiations shows how DG Trade has made use of a packet of tools, including on-line consultation in different Member State languages, stakeholder meetings that provide the opportunity for discussion with EC staff and live web-streaming to allow the meeting to be viewed over the internet.

The expert/advisory group: is another tried and tested approach across the Commission. Many aspects of this approach have been defined by the Secretariat General of the European Commission and the DGs consulted take steps to define their own interpretation / implementation or guidelines concerning expert groups. DG AGRI for example has defined the rules in a Commission Decision, which ensures that the process is clear for all involved and limits the need for additional discussion. At the same time, DG AGRI's approach is supported by the significant budget that is available to pay per diems and travel. This approach also recognises the importance of bottom-up feedback and putting external experts in the driving seat when it comes to chairing meetings and drafting minutes. One key feature here may be that experts are included in their own individual capacity. Although the Terms of Reference for DG Trade’s Contact Group suggest that individuals are included in the Group on a ‘personal basis’, from the interviews with Contact Group members it appears as though members consider that the seat at the table is held by their organisations. This is reinforced by the fact that if a staff member leaves he or she is replaced by another individual from the same organisation.

The more formal ‘expert-group type process’ also provides a transparent route to civil society inputs to policy making. There has been some discussion with regards to DG Trades’ approach as to whether the meetings actually have any impact on policy making. There seems to be a general level of acceptance that any impacts are relatively loose and difficult to define, meaning that the CSD is less able to meet the objective of improving policy making. Meanwhile in DG AGRI expert groups are organised with the specific purpose of discussing policy and their discussions can lead to formal outputs to the DG and feedback from the DG about how inputs are handled.

Stakeholder platforms: can combine both formal and informal process aspects with a transparent procedure for establishing platforms. Experience of platforms within DG EAC highlighted the need for platforms to have clearly articulated objectives and outputs. Without this there is a risk that their outputs will be less useful. It was noted that there can be significant administrative burden to manage a stakeholder platform. This finding raises questions as to its appropriateness for DG Trade, given the limited manpower available within the DG. In addition, experience suggests that another potential challenge relates to the fact that platforms can over time feel somewhat closed with the same people making the same inputs. In the case examined, there was a significant budgetary requirement to be
taken into account. Yet, when **financial resources are made available then the Commission is better able to require specific outputs** from interactions with civil society. This raises the question as to what DG Trade really expects and wants from its civil society dialogue process.

**Web-based direct dialogue approach** can be used to facilitate informal interaction with both stakeholders and citizens. Elsewhere in the Commission there is some good experience of direct and live interactions with audiences over the internet. In the example discussed, a two-step process was used engaging stakeholders in the definition of topics for stakeholder dialogue. DG Trade is not necessarily looking to turn the CSD into an on-line dialogue, but it could copy the tools used elsewhere in the Commission, including on-line and video chats, either in an **on-going capacity or from time-to-time to supplement the face-to-face dialogue** via meetings. There is often a fear that direct interactions lay the Commission open to potential abuse. However, the DG MARKT experience shows that a frank and honest approach can make for a meaningful, real dialogue with interested groups. To make this work a degree of promotion is required to engage stakeholders. Consideration may be required of the possibilities for dialogue in languages other than English.

### 3.2.5. Benchmarking of external organisations

Investigating how other similar organisations approach the management of stakeholder consultations is an important element of this evaluation; it allows a view on alternative complete process approaches. The organisations selected for benchmarking were the **US Trade Department** (USTR), the **World Trade Organisation** (WTO), **Mind-Lab** (a think-tank associated with the Danish Government) and the **UK Cabinet Office**.

The analysis of benchmarking organisations has been conducted using the following methods:

- Desk-based review of available documentation and data, including:
  - Strategic CSD material (CSD strategies and/or plans);
  - Organisations’ websites (structure of CSD sections, navigation, content, look & feel);
  - On-line libraries (newsletters, press releases, speeches, reports / publications, photos);
  - Use of interactive features (feedback forms, forums,)
  - Available information on meetings and events (past and upcoming);
  - Any additional documentation and data obtained from the benchmarking institutions / interviewed officials; and
  - In-depth interviews with key managers responsible for the process.

The key findings from the benchmarking exercise, grouped per theme are presented below.

#### CSD strategy and objectives

- **USTR’s CSD strategy is very strongly focused on target groupings.** The USTR establishes where its stakeholders are at a given point in time or geography and **takes the argument to them, rather than waiting for the stakeholders to**
approach the institution. Additionally, positive value judgements (e.g. "benefits of trade" bookmark on the main website) are built into the strategic language used by the USTR right from the outset.

- It may seem that whereas in DG Trade the rationale for conducting CSD at all is one of obligation: we talk to civil society because we should do so; it is the right thing to do. MindLab would ask, “What are the changes in behaviour expected among stakeholders as a result of the CSD dialogue and how will their experience of the European Commission be changed afterwards?”

- The CSD objectives of the UK government are much wider than those of DG Trade, but what is noticeable is that they have a clear outcome in mind from the outset. There is a specific policy or project under consideration and the aim is that when the time comes for implementation the CSOs consulted not only feel a sense of ownership, but recognise the policy as having been designed with their needs or concerns very much in mind.

**Target groups and methodology for dialogue**

- There is a conscious effort being made in WTO to connect with parliamentarians, private business and the general public. The Public Forums have been running for many years now and have become one of the most important platforms for dialogue amongst the stakeholders of the multilateral trading system. They are a significant feature of the international calendar.

- What distinguishes USTR is a constant desire to broaden the domain within which they are making contact. The stakeholder universe is never seen as being static. First, the strong links developed with other, overlapping departments within the U.S. administration and second the degree to which existing stakeholders are used as conduits to reach out to new ones. In the case of USTR the degree to which stakeholders can influence other stakeholders is it is afforded great significance.

- For MindLab, the target groups are derived from the subject. They do not start by asking what is the universe of stakeholders, but rather which are the stakeholders whose engagement is crucial to the desired outcome of this project. This is not to exclude stakeholders, but to prioritise them. Two key methodologies are deployed as a core of the MindLab process: the “problem tree” analytical tool; and “personas” which is a way of analysing the characteristics of particular stakeholder groups. These are not just methodologies for dialogue. They are methodologies for identifying changes needed in the real world, using dialogue among other means.

**CSD inputs to policy-making**

- The key figure in the feedback process within the WTO is clearly the Director General. It is his personal commitment to civil society dialogue which gives the CSD team their self-confidence to engage both externally and internally.

- There can be little doubt that the closeness of USTR operations to U.S. Government policy making is a function of the character of the Representative himself. Ambassador Froman is both visible and vocal. He plays a very personal role in
stakeholder engagement and uses every opportunity to link together public appearances and CSD objectives.

- It is what we might describe as MindLab’s “after-sales service”, which contributes most to the transfer between collaborative work and change in the real world. There are reviews after three or six months of whether implementation has actually taken place, and whether it is effective. This is not just a process of holding meetings every six months and asking stakeholders if all is well. It is an objective examination of how end-users experience of the product or service has been changed. Apart from the benefits in terms of modifying or improving delivery where needed, it also creates a strong sense among stakeholders that the provider does actually understand their experience as well as valuing their opinions.

- For the UK government, the dialogue with civil society stakeholders is very much integrated into the policy making process.

**Challenges**

- For the WTO, the challenge is to build on what it has recently started to achieve. A diverse stakeholder population means that a one-size-fits-all approach is not desirable. Perhaps the main lesson for DG TRADE is not to be afraid of attempting experimentation. “If it works, that’s fine. If it doesn’t, then move on.” To that might be added the advice to treat failure as a learning experience.

- America is a big country, and it is clear that even an institution with the resources of USTR will have difficulty processing the sheer volume of information and position-taking emanating from its stakeholder universe. We could note that standard Customer Relationship Management (CRM) software is increasingly being used in the commercial sector for stakeholder management as well. Such systems allow for tracking of existing opinions, shifts in opinion and well as the ability to group stakeholders by areas of interest rather than simply by location or sector of activity.

- MindLab has a particular approach to managing confrontation. MindLab’s approach to confrontational stakeholders is sometimes to engage with them separately before bringing them together.

- The public consultations managed by OCS in the UK are very visible. The consultation documents are published online, the responses of the various CSOs are usually posted on their respective websites and the office provides regular progress updates online, setting out what has been discussed and what has been put into practice.

**Key success factors and possible best practice transfer**

- For WTO, the need for an overarching communications strategy within which civil society dialogue can operate was stressed more than once. It does seem that there is a danger here of the “silo mentality”. The press office, the CSD team and the negotiators are all engaging in activity which, directly or indirectly, involves the passing of messages to stakeholders. But how much do they feel part of the same process and how much does each feel that the other is trespassing on its terrain?
• Of all the factors contributing to the vigour of the USTR civil society dialogue process, the strong and direct involvement of the Ambassador seems the most significant. It seems worth asking the question, as we move from one Commission to another, of how much the DG wants to identify the whole CSO dialogue, with the personality of the incoming Commissioner. If the key policy maker is already intimately involved in the process, the question of how inputs are transmitted becomes irrelevant.

• Even though there are a number of specific processes and methodologies which could usefully be transferred to DG Trade from MindLab, it is probably the attitude of mind which is most important. The approach of starting with the intended change in the real world and working backwards from there is a very different one. It would be interesting and instructive for the DG to select a project, or part of a project, and pilot a MindLab-type approach.

• The key lesson from the UK Cabinet Office is to engage with CSOs from as early as possible in the policy-making process. But in fact, looking at their operations objectively, it may well be that the involvement of officials all the way through the process to implementation is just as significant. On this model, civil society dialogue runs alongside the whole development, evolution and implementation of policy in an open and transparent manner. If that is too much to hope for as an objective, it may at least become a guiding principle.

3.2.6. Interim Report

Toward the end of the data collection phase, the evaluators drafted the Interim Report. The report was intended to show the progress of the evaluation team in gathering evidence from the variety of prescribed sources.

3.3. Analysis, Judgement and Final Reporting

The purpose of the final phase of the evaluation was to compile all the findings and results from the different sources of qualitative and quantitative evidence gathered by the team. This phase was completed with the drafting of final reporting deliverable, i.e. this report to the European Commission.
3.4. **Risks and challenges of the evaluation**

When it came to collecting and analysing data, the evaluation faced a number of practical challenges that led to certain limitations in the evidence base. These should be taken into account when using and interpreting the results. Issues were predominantly linked to the difficulties in generating an interest to participate in the evaluation, in the following areas:

- DG Trade staff engagement: the very limited response to the staff survey (7), despite repeated reminders, the limited resource allocated to this process and no ongoing promotion to increase involvement;
- Collaboration of the CSOs: low response rate for online survey despite repeated reminders, low levels of willingness to participate in the in-depth interviews, low return of the feedback surveys after the meetings the evaluators attended as observers.

These data limitations meant that certain analyses could not be carried out quite to the extent hoped for. Nonetheless, following the triangulation of data from different sources and methods, overall the evidence base was sufficient to answer all the pertinent evaluation questions and enable us to draw robust conclusions to the extent possible.
4. EVALUATION RESULTS: INTRODUCTION

The subsequent chapters form the main content of this report and respond to the evaluation questions, as listed in Table 1, and detailed in the Evaluation Questions Matrix developed by the evaluation team.

The chapters provide our assessment of the Civil Society Dialogue process in DG Trade, and are structured following the four evaluation areas:

- Chapter 5: Information and Communication (Evaluation Questions 1 and 2)
- Chapter 6: Relevance (Evaluation Questions 3–7)
- Chapter 7: Effectiveness (Evaluation Questions 8–11)
- Chapter 8: Efficiency (Evaluation Questions 12–17)

Each chapter reiterates the respective Evaluation Questions, followed by a short description of the evaluators’ approach and methods used for answering a given question and a concise table outlining the key issues, succinct findings and evidence, and the data sources of the evidence. The detailed evidences, grouped by research method, were presented separately to DG Trade. Each evaluation questions’ section closes with a distinct conclusion that provides an answer to the evaluation question, and justification drawing on key findings presented previously.
5. EVALUATION RESULTS: INFORMATION AND COMMUNICATION

This section presents the key findings from the evaluation regarding the first two evaluation questions, which deal with the fit of the CSD process with DG Trade’s overall objectives (3.1) and the process’ contribution to DG Trade’s I&C policy (3.2). Evidence to answer these questions is drawn primarily from the desk research and the interviews with the sample of CSOs’ representatives.

5.1. Conformity with commitment to transparency and good governance

To answer this question it is necessary to have clear definitions of what is meant by transparency and good governance. For transparency, we took the definitions included within the formal objectives of the Civil Society Dialogue. The objectives make three specific references to transparency in relation to the way policy is developed, consultation with all parts of society and the fact that CSO participants are listed in the Transparency Register. These elements were used as the benchmark for transparency against which evidence collected in the evaluation is considered.

There is no specific reference to the term ‘good governance’ in the description of the Civil Society Dialogue. Therefore, we referred to the criteria defined in the Commission’s White Paper on Governance¹⁴ and considered the way that the management of the CSD reflects these criteria. Findings relating to transparency and governance are presented in the below table.

<table>
<thead>
<tr>
<th>Transparency</th>
<th>Fit with transparency goal</th>
<th>Source of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commitment to improving transparency in the way policy developed</td>
<td>It is not possible to identify the CSD inputs into policy making. There is no internal / transparent process to show if and how this is done, but there is likely to be some feed through as and when staff identify added value. Expectations need to be set. There are diverse views: for some the CSD is a contribution to transparent policy making, where valid points maybe taken into account / others say no impact.</td>
<td>Interviews with DG Trade staff</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interviews with Contact Group / Interviews with CSOs which have reduced participation /</td>
</tr>
</tbody>
</table>

¹⁴ COM(2001)428
### Transparent and accountable policy based on consultation with all parts of civil society

<table>
<thead>
<tr>
<th>Problem</th>
<th>Solution</th>
<th>Evidence</th>
</tr>
</thead>
</table>
| Some NGOs are less interested in participating because of scarce resources and a sense that inputs are not taken into account.  
The dialogue mechanism may not be fully inclusive. Recognition of a need to increase participation in meetings.  
There are mixed views on extent of representation of different sectors in CSD discussions (45.5% of NGOs adequately represented, 65% of business was adequately represented)  
Limited involvement of organisations outside Brussels. | Participant CSOs are invited to CSD meetings on the basis of their registration in the Transparency Register  
Other bilateral meetings take place outside CSD where more in-depth discussions are held – these are not transparent.  
There are mixed views as to whether these should be transparent (43.5% Yes, 32.4% No). The approach to bilateral meetings is not in-line with transparency required of the CSD.  
USTR publishes meetings for the week ahead. | CSO survey  
Interviews with DG Trade staff  
Interviews with Contact Group  
CSO survey  
Data on participation and CSO survey. |

15 'DG Trade regards this as a briefing exercise, not a consultation,’ quote from interview with CSO that has stopped coming to CSD meetings.

16 CSD Objective 4 on improving transparency and accountability
<table>
<thead>
<tr>
<th>Governance criteria</th>
<th>Evidence</th>
<th>Source of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Openness (transparency)</strong></td>
<td>Issues raised above also came up. Criticism that the occasional publication of negotiated texts suggests transparency is not uniformly applied. Transparency issues around the Contact Group. Lack of awareness of Group 66%. Meeting minutes not on-line, unclear management processes.</td>
<td>Contact Group interviews, CSO survey, CSD website, Observation at CG meeting</td>
</tr>
<tr>
<td><strong>Participation (citizens must be more systematically involved in the drafting and implementation of policies)</strong></td>
<td>Partial relevance as CSD does not relate to drafting and implementation of policies. Need for more inclusive participation and feedback that limited promotion of opportunity at the moment, but need to keep costs to a minimum. More participation may require bigger budgets, which raises questions about us of EU budget.</td>
<td>Objectives of CSD, Interviews with DG Trade staff, Contact Group and some survey evidence, Communication Strategy, USTR &amp; UK Gov benchmarks</td>
</tr>
<tr>
<td><strong>Accountability (clear roles in decision-making process / actors assume roles)</strong></td>
<td>Partial accountability. List of registered participants and EC staff published in advance. Lack of information on what taken into account in decision-making / call for more transparency and more open discussion on trade developments/ call for greater clarification of scope. Yet need to retain confidentiality.</td>
<td>Evidence from CSD website, Interviews with Contact Group, DG Trade staff, Mindlab (Danish benchmark), Contact Group</td>
</tr>
<tr>
<td><strong>Effectiveness (decisions taken at appropriate level and time / deliver what needed)</strong></td>
<td>There is satisfaction with the timing and frequency of meetings (67% of survey respondents). DG staff doubt whether CSD input captures questions most critical to debate. Low response to management</td>
<td>CSO survey, Interviews with DG Trade staff, Survey of DG Trade managers, Interviews with Contact Group / Non-members of</td>
</tr>
</tbody>
</table>
survey also suggests lower prioritisation of CSD.

Calls for more in-depth discussion / discussion too general / DG positions already decided.

Coherence (approach coherent with other policies)

Other DGs invited to participate in relevant meetings

Anecdotal evidence from CSD team

Evidence from website.

Conclusion:

The CSD reflects a commitment to transparency, but does not contribute to transparency on the way that policy is developed, which relates to the CSD objective on improving transparency and accountability\(^\text{17}\). The CSD process is to a great extent aligned with principles of good governance, but there is no clear channel for CSD outputs to feed into the work of the DG. Also, there is a lack of clarity concerning membership of the Contact Group and transparency with regards to what the Group does. The Civil Society Dialogue process shows a commitment to a higher level of transparency with regards to information on the trade policy activities of the DG. The dialogue is a unique process within the European Commission, which allows regular face-to-face opportunities for CSOs to hear about what the DG is doing and to ask questions. Highly relevant inputs from CSOs will undoubtedly be taken into account in the policy making process and DG Trade staff and CSOs see the potential and sometimes intangible value of these regular meetings. However, it is difficult to conclude whether or not the CSD represents a real commitment to transparency in the way policy is made because there are no internal channels in place to ensure that insights are systematically taken into account. Many CSOs report that there is a lack of information with regards to how and why certain negotiating positions have been adopted. This leads to the conclusion that the commitment to greater transparency on how policy is made is a political statement to describe the aspirations of the CSD process, but is not reflected in the reality.

The fact that participation in the CSD is conditioned on the organisations concerned being in the EU’s Transparency Register reflects compliance with Commission procedures rather than a particular policy commitment on the part of DG Trade. Outside the CSD, there are many bilateral meetings with external organisations, for which a similar requirement is not a condition. These meetings are reported to yield more fruitful levels of discussion.

Furthermore, there are several aspects of the CSD Contact Group, a critical element in the CSD process, which seem out of step with a political commitment to transparency. Low awareness among CSOs of what the Contact Group does, does not necessarily equate to poor transparency. An informal approach has its virtues with regards to supple and efficient meetings and having the same faces round the table also helps things to run smoothly.

\(^\text{17}\) See description of the objective of improving transparency and accountability http://trade.ec.europa.eu/civilsoc/csd_proc.cfm
lack of information following to and from the group from the CSO community, continuous membership and increased potential to influence / connect\textsuperscript{18} raise questions of transparency. This situation has continued over many years. This group reflects an ad hoc structure and does not fit the model for an advisory or expert group, as defined by the Secretariat General.

Concerning the other governance criteria of participation, accountability and effectiveness: the CSD does not really fit the governance criteria of participation to the extent that this is expressed as relating to the drafting and implementation of policies, which goes beyond the remit of the CSD. Yet there is a need to retain a focus on participation and how to ensure that diverse groups are represented particularly with the inclusion of the Sustainability Chapters in trade negotiations and the fact that NGO CSOs feel that their sectors are not adequately represented. With regards to process aspects of CSD meetings, governance criteria for accountability, coherence and effectiveness can be considered to be met. There is complete transparency with regards to DG and CSO participants in meetings and the way that meetings are run, opportunities are taken to involve other DGs where this is considered to be relevant and the timing of CSD meetings is considered to be appropriate although there are small aspects that may improve their operational effectiveness. The same assessment cannot be made with regards to content. The type of information on the table does not facilitate debate. This limits the added value both to the Commission and to the CSOs.

5.2. Conformity and contribution to DG Trade’s I&C

Evaluation Question 2:

How does CSD fit in and contribute to DG Trade's information and communication on trade policy?

For the purposes of answering this question the term 'fit in' is defined as the extent that the CSD is aligned and compatible with the DG’s Communication policy. Meanwhile the CSD ‘contribution’, is defined as the extent that the CSD adds value to the DG’s information policy. Evidence for the answer is drawn from segmentation of the key features of DG Trade’s 2014 Communication Strategy and analysis of the extent of fit and contribution of features of the CSD to the communication strategy. This information is presented overleaf in a table, which describes the extent of fit and contribution and the source of evidence.

<table>
<thead>
<tr>
<th>Key features of strategy</th>
<th>CSD fit and contribution to strategy</th>
<th>Source of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target audiences</td>
<td>CSD fits with focus on specialised</td>
<td>Transparency</td>
</tr>
</tbody>
</table>

\textsuperscript{18} This group is not discussing policy with DG Trade. It makes suggestions for future agenda items for CSD meetings and this is effective reflected by the high rating of the survey on the quality of topics discussed. There is no formal link between this group and participation in the WTO Ministerials, but the group may be used by DG Trade for alternative purposes if needed.
## Broader approach involving outreach to the broader public
- Multipliers
- Specialised audiences

Audiences and multipliers, but not pro-actively the broader public. Information concerning meetings is made available on the internet for those who seek it out, including press releases by other organisations.

No additional contribution to strategy re. target audiences: attempts have been made to take CSD to the Member States, but these have been found to be rather inefficient / not necessarily broaden the appeal of the exercise.

### Target audience needs
- Focus on meeting demand for transparency re. the negotiating agenda and main bilateral negotiations

The CSD can be considered to fit with the goal of meeting demand for transparency. One of the main reasons for attending CSD meetings is to find out about DG Trade initiatives (>80% of survey respondents). The opportunity to provide a position paper is highly valued (87% say very important and somewhat important), although it is not often taken up.

There is a more mixed picture with regards to the contribution to this goal. CSOs appear to be less satisfied with what the DG does with CSD inputs and the feedback it provides to meeting participants. 60% of survey participants are not aware of the role of the Contact Group.

Although outside the CSD process, there is a mixed view on the need for the DG to publicise bilateral meetings on the website (43.5% Yes, 34.5% No, 24% Don’t know).

### Key messages
- The EU’s common trade policy is effective in trade negotiations;
- How the policy benefits the EU economy and directly affects Europe's citizens

- Particularly in contrast to USTR, this message is not overtly communicated.
- The CSD communicates this message partially. Press releases provided as meeting background

| register and profile of participants at meetings | Evidence available on DG Trade’s website | Feedback from CSD team at DG Trade and from interviews with Contact group. | CSO participant survey |
| Desk research on CSD meeting documentation re. meetings held in 2014 | Comparison with | Interviews with members of the contact group |
### Key messages

- Clear and reasonable definitions of real potential strategic benefits of TTIP
- Descriptions of the reality of what is under discussion and the expected economic gains

<table>
<thead>
<tr>
<th>Specific communication actions</th>
<th>Documents highlight this message, but do not necessarily show benefits to citizens.</th>
<th>External benchmark organisations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increased synergies between media relations, stakeholder outreach, web-based and social media</td>
<td>The CSD has helped to ensure reasonable definitions of the strategic benefits of TTIP, including via press releases, Q&amp;As, etc. and efforts to arrange additional opportunities to enhance discussion on TTIP suggest added value here.</td>
<td></td>
</tr>
<tr>
<td>A dedicated TTIP communication operation</td>
<td>The final key message is broadly communicated, but economic gains may not being sufficiently used to promote the work of the DG.</td>
<td></td>
</tr>
<tr>
<td>Transparency in stakeholder communication because negotiators have a greater need for stakeholder input</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow up of Deloitte report, inc. enhanced: focus on social media; communication capabilities in EU Member States</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Specific communication actions

- Linkages between media information (press releases, website information and information to stakeholders) evident on website.
- No additional outreach to stakeholders. The CSD is not open to the media.
- A dedicated TTIP communication operation is in place.
- The need for greater stakeholder input does not flow down to meeting participants: 25% report that the DG is not effective or not very effective at all at handling their inputs. Interviews with DG Trade staff suggest CSO inputs via the CSD are interesting, but not vital.
- Between 2008 and 2010 annual CSD meetings were organised in a Member States (MS), no current actions to increase participation of CSOs located in MS. One way of facilitating this could be provision of interpretation facilities at meetings, but evidence from elsewhere in the Commission is this is costly.

<table>
<thead>
<tr>
<th>Evidence on CSD website</th>
<th>Feedback from CSD team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interviews with CG members</td>
<td>Feedback from CSD team / CSD website</td>
</tr>
<tr>
<td>CSO survey</td>
<td>Interviews with DG staff</td>
</tr>
<tr>
<td>CSD team</td>
<td>Interviews with other DGs</td>
</tr>
</tbody>
</table>
Evaluation of DG TRADE’s Civil Society Dialogue: Final Report

Question if CSD discussion could take place on a protected, on-line space in addition to face-to-face.

Interviews with CG

Budgetary implications
- Budget neutral

The CSD approach fits with strategy and contributes to a streamlined budget. Budget is kept to a minimum.

Feedback from CSD team.

Limited use of the travel facility. 72% of CSO survey respondents do not use travel budget, circa 10% did not know or were unsure it is available.

CSO survey

Conclusion:
There is some fit between the CSD and the DG’s approach to information and communication (I&C), but it is concluded that the CSD does not make a strong contribution to meeting information and communication goals expressed in the Strategy. Not all target groups are covered and their needs are not well met. Key messages are partially communicated. Communication on TTIP shows greatest alignment to the overall I&C approach. It is noted that, for the moment, the CSD whilst being a communication channel is not intended as an instrument to meet specific I&C goals.

The CSD is targeted towards one of the three target audience groups defined in the Communication Strategy: specialised audiences. There are no proactive actions taken to reach the general public and aside from press releases published alongside materials for each meeting. It was decided not to allow the media to attend CSD meetings because the Contact Group had advised that the CSD should remain as a privileged moment for contact between CSOs and DG Trade. There are differences of opinion on whether the media should be able to participate within the DG. The CSD has potential to meet its target audience (CSOs’) needs / interests in the EU negotiating agenda\(^{19}\), but this potential is currently not fully met because of limits set by the DG on the depth of information that it is willing to relay to civil society, in-line with the perceived need for confidentiality in international negotiations. As a result, there is an underlying sense that the information needs that CSOs really demand, more technical detail / negotiating texts, are not being met.

In theory, the CSD could be a vehicle for conveying the four key messages defined in the Communication Strategy. There may be some communication of the economic benefits of trade it is difficult to see a clear link being made to impacts on citizens. The significance of TTIP, in citizens’ eyes, seems to have been well understood by DG Trade and significant efforts have been made to step up communication in this area. The CSD process has not been opened up to deeper debates on the real winners and losers of EU deals. The sense that DG Trade needs stakeholder input does not translate through to the CSD and the CSD is one of several possible mechanisms in place and this is felt keenly by DG staff and reflected

\(^{19}\) This need is defined in the Communication Strategy
in the types of discussions held, which tend to be question and answer sessions around DG presentations of information rather than real debates. The CSD does not address the need for actions to increase communication capabilities in the Member States, yet this communication strategy goal is not fully relevant to the purpose of the CSD. The CSD has no specific actions to step up stakeholder outreach, which is expressed in the Communication Strategy, but additional outreach could have resource implications at odds with the current budget neutral approach.
6. EVALUATION RESULTS: RELEVANCE

This section presents the key results of the evaluation regarding Evaluation Questions 3 to 7, which aim to shed light on the relevance of CSD objectives (4.1), perception of the process and its usefulness by both DG Trade and the process participants (4.2 and 4.3), relevance of the process for DG Trade (4.4) and CSD’s potential role in raising public awareness on trade issues (4.5). Evidence to answer these questions is drawn from the desk research complemented with in-depth interviews and online surveys with CSOs and the staff of DG Trade.

6.1. Relevance of the CSD objectives

Evaluation Question 3:

Do the objectives of the CSD remain relevant?

The Civil Society Dialogue website states that the CSD has four objectives. Each objective is listed and an explanation of what is intended is provided. Consideration of objectives takes into account the intent behind each objective in addition to the wording of objectives. Findings on the relevance of CSD objectives are presented in the below table. Conclusions on the extent that the CSD objectives remain relevant are drawn below.

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<td>This objective is relevant to the process.</td>
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</tr>
<tr>
<td></td>
<td>CSD meetings provide an opportunity to hear CSO views on trade issues.</td>
<td>Observations at meetings</td>
</tr>
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<td>2. To address civil society’s concerns on trade issues</td>
<td>The CSD can be considered to provide a forum to address civil society concerns.</td>
<td>Observations at meetings / Interviews with DG staff and Contact Group.</td>
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<tr>
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<td>&gt;75% of survey participants attend meetings to get answers to their questions</td>
<td>CSO survey</td>
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<tr>
<td>3. To improve policy-making</td>
<td>There are mixed views on this point, with some suggesting that this is rather artificial and others considering that the fact that the CSD process is relevant to this objective is sufficient.</td>
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</tr>
<tr>
<td></td>
<td>It is not possible to clearly detect how CSD inputs improve policy-making / there are other important routes to sourcing external views / experiences.</td>
<td>Interviews with DG staff</td>
</tr>
<tr>
<td></td>
<td>It is unclear how /why the DG needs to improve policy making.</td>
<td></td>
</tr>
<tr>
<td>4. To improve transparency and accountability.</td>
<td>&gt;70% or participants attend CSD meetings to find out about DG Trade initiatives. This suggests alignment between the CSD and this process.</td>
<td>CSO survey</td>
</tr>
<tr>
<td></td>
<td>The process is open to any CSO registered in the CSD and in the EU Transparency Register – all are welcome to attend.</td>
<td>Information on CSD website</td>
</tr>
<tr>
<td></td>
<td>However, there are mixed views on transparency. A frequent criticism is that the level of information is too general and could be sourced elsewhere. Others are more satisfied with the goal of greater transparency and the openness of the process.</td>
<td>Interviews with CSOs in CG and outside CG, open questions in CSO survey.</td>
</tr>
<tr>
<td></td>
<td>There is a lack of transparency surrounding the Contact Group circa 75% of CSO survey participants do not know what the CG does / minutes are not posted on-line. Significant dissatisfaction with the way CG members are chosen and the lack of transparency on this. The Group is presented as a sounding board, but members have privileged access to information, for example additional briefings / inputs to assist the Commission.</td>
<td>CSO survey and observations at CG meetings</td>
</tr>
</tbody>
</table>
Conclusion:

The CSD does not have specific objectives. It has goals. Goals are broad general intentions that cannot be validated. Objectives are narrow and precise. Good practice states that objectives should be SMART (Specific, Measureable, Accurate, Realistic and Time-bound). We suggest that some of the problems with the CSD could actually be resolved if the process had a set of clear objectives to provide a steer both to staff and to CSOs. However this evaluation question requires an assessment of the stated ‘objectives’ and we conclude that these remain partially relevant today.

The objective of hearing civil society’s views remains relevant to the CSD and is reflected by the current process. There are no steps currently being taken to encourage broader participation. With regards to encouraging active participation in meetings, CSOs are given the opportunity to pose questions. There may be additional steps that the DG could take to further stimulate participation in meetings. Mindlab, the Danish benchmark example, provides examples of how more innovative techniques can be used to facilitate discussions.

The statement/objective: ‘We want to address civil society’s concerns on trade issues’ is not really relevant to the CSD. This is a question of phrasing and intent. Meetings are a forum to answer CSO questions, but not to address their concerns. The DG has no obligation to address CSO concerns in its trade activities. The intent behind the objective/statement suggests that the DG wants to debate issues and discuss possible courses of action on topical issues. CSD meetings concern topical issues, but are not forums for debate. Issues are selected through discussion with an informal Contact Group, but information does not consistently flow to members of these organisations as intended.

The statement/objective: ‘We want to improve how we make policy’ is the most tenuous of the objectives. This suggests that the policy-making process is deficient in some way. This is a valid political goal, but the debate that it is suggested to be required to do this, is not happening. There may be some influence of CSD discussions felt within the DG, but the DG has many other ways to inform policy-making. There is a sense that the CSD is important, so that the DG maintains good relationships with potentially critical stakeholders, but not an important source of evidence. There seem to be many reasons for this, including the general nature of information provided and confidentiality issues, the lack of debate and depth of discussion, and possible expertise gaps on the side of CSOs. Also, whilst it is refreshing to have a bottom-up process with topics suggested by CSO representatives, this may actually be counterproductive because the demand for insight is not always driven by the DG policy units. Despite this, the DG uses the CSD to discuss particular topics, such as SIAs, and the recent debate on trade and sustainable development.

With regards to the fourth objective on transparency and accountability, this objective remains relevant. The CSD process is fully transparent, going far beyond the approach taken by many other DGs. The CSD score is lower in the assessment of the transparency of what is discussed and this is the crux of the whole initiative. Is there a way to harvest the fruits of real debate without compromising confidentiality?

6.2. Perception of the process within DG Trade and by the participants
How is the process perceived within DG Trade and by the participants (number of meetings, topics, quality of information and exchange of views, involvement of Commission representatives)?

The table below presents findings from the evaluation perceptions of the process among DG Trade staff by CSO participants in the process. The sources of evidence used to answer this question are the survey of CSO participants, survey of DG Trade Senior and Middle managers, interviews with DG Trade and interviews with members and non-members of the Contact Group, and interviews with the CSOs that have reduced or stopped their participation in the CSD process.

<table>
<thead>
<tr>
<th>Features of CSD process</th>
<th>Evidence of satisfaction / appropriateness among CSOs</th>
<th>Evidence of satisfaction / appropriateness felt in DG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of meetings</td>
<td>For circa 69% of CSO survey respondents the number of meetings is adequate</td>
<td>For 4 out of 7 of DG Trade survey respondents the number of meetings is adequate</td>
</tr>
<tr>
<td>Management of the meetings</td>
<td>The management of meetings was rated as the “most effective” aspect of CSD meetings process by over 73% of CSOs; 62% of the CSOs considered the duration of the meetings to be effective or very effective; 53% of the CSO respondents found the format of the meetings very effective or effective</td>
<td>All of the DG Trade representatives who took part in the survey considered the management of meetings to be “effective”; The duration of the meetings and their current format are considered to be effective by 4 out of 7 of the DG Trade respondents</td>
</tr>
<tr>
<td>Topics</td>
<td>72% of CSOs consider topics are effective or very effective elements of the CSD organisational features; Yet CSOs that reduced their participation did so because of their interest in a specific topic, which ceased to be covered;</td>
<td>One interviewee (a DG Trade panelist at the meeting) admitted that he was on the “receiving end” of the agenda, but nonetheless seemed entirely satisfied.</td>
</tr>
<tr>
<td>Quality of information</td>
<td>Only 45% of CSO survey respondents believed the quality of information is effective or very effective</td>
<td>The quality of CSOs contributions was rated as “good” only by one of the seven respondents to DG Trade survey;</td>
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</tr>
<tr>
<td><strong>Exchange of views</strong></td>
<td>The interviewed DG Trade representatives see a danger that some CSOs may use the meetings as a platform for their own position rather than as an opportunity to dialogue;</td>
<td>Half of the respondents to DG survey attend the meetings to exchange views with CSOs; at the same time only 2 of 7 respondents believed CSD to be an effective mechanism for the exchange of views.</td>
</tr>
<tr>
<td></td>
<td>Less than half of the CSOs found the contributions of other CSOs to be effective or very effective;</td>
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<tr>
<td></td>
<td>A sense that DG may not take all inputs into account was believed to be a factor limiting CSOs participation to an extent by 50% of the survey respondents;</td>
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<tr>
<td></td>
<td>Exchange of views was quoted as one of the best features of the CSD in the meeting assessment feedback form;</td>
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<tr>
<td></td>
<td>At the same time, the interviewed CSOs mostly consider the meetings as the EC’s platform for sharing information, not participating in an exchange of views;</td>
<td></td>
</tr>
<tr>
<td><strong>Involvement of EC reps</strong></td>
<td>52% of the CSO respondents considered the quality of speakers (mostly Commission staff) at the meetings to be effective or very effective;</td>
<td>6 of 7 respondents confirmed that they provide inputs for the CSD meetings;</td>
</tr>
<tr>
<td><strong>Functioning of the Contact Group</strong></td>
<td>Over 75% of the CSO respondents were not aware of the role of the CG;</td>
<td>Two of the DG Trade survey respondents have no opinion or are not aware of the role of the contact group;</td>
</tr>
<tr>
<td></td>
<td>The business-sector CSOs expressed greater levels satisfaction (over 35%) than the NGOs (29%); none of the NGOs was “very satisfied” with the CG’s operations.</td>
<td>Equal proportion of the respondents considered the CG functioning to be effective.</td>
</tr>
<tr>
<td></td>
<td>Many interviewed CSOs were very much dissatisfied with the perceived lack of transparency in how the CG</td>
<td></td>
</tr>
</tbody>
</table>
Conclusion:

There are mixed views on the CSD within DG Trade and within Civil Society. This is a timely, well organised opportunity for the two sides to meet on a regular basis in an open format. Meetings involve providing information, and questions and answers on that information. This is appreciated on both sides. Business organisations are most strongly in favour of the process, but there seems to be a lack of commitment on the side of the DG and also NGOs because of the general nature of the exchange that takes place. This leads to several key questions. Can the dialogue process be turned into a useful debating forum which achieves maximum added value for the Commission and a real sense of contribution by CSOs? Is this desirable within the EU institutional framework?

CSO participants consider that many aspects of the CSD process are effective. Responses to the survey and feedback gained through the evaluation process allow us to conclude that the number and frequency of meetings is about right, using the Contact Group to put forward ideas for topics means from a CSO perspective the topics are well rated. Meetings are considered to be well chaired and to be of an appropriate duration. There are mixed views on the quality of information provided both by the DG and by CSOs. We can conclude that generally CSOs representing business organisations tend to be more positive in their assessment of the CSD than those representing NGOs, but none-the-less the content of meetings does not match the quality of organisation / chairing in the minds of CSOs. Meeting formats and presentations are relatively standard and speakers seem to be good enough. There are mixed views on the Contact Group. Many CSOs do know what the Contact Group does. There is concern about the lack of information about this group. The high level of interest in being involved suggests a need to review membership in order to take this demand into account.

The CSD has become embedded to a certain extent within DG Trade. It is generally considered to be a worthwhile exercise important to keep in touch with views of CSOs on the ground and provide information in an inclusive format. Aside from this kind of outreach role, which is deemed to be important, it is difficult to detect the extent that the need for the CSD is clearly felt within the DG beyond the expression of political will. The approach to TTIP represents a change. However, for the most part, the policy units are not driving the need to discuss or debate. This may relate to the decision to have a bottom-up process and / or a sense that the CSD is not part of the democratic process, but whatever the reason it infers that the CSD is not critical. The very limited response to the staff survey (7), despite repeated reminders, the limited resource allocated to this process and no on-going promotion to increase involvement, seem to be in-line with this conclusion. Evidence from other DGs suggests the push from senior hierarchy is what makes the difference within a DG.
It is recognised that the CSD is one of many channels to receive feedback and that feedback via the CSD can be quite general/there are more in-depth discussions held elsewhere. There are differing views on the practical usefulness of the exercise. Within the evaluation process, we were unable to detect the extent that the speaker and the way he or she structures the presentation to CSOs have an impact on the quality of inputs received. We detected some caution within the house with regards to how to manage potential conflictual situations, for example because of the involvement of diverse interest groups in CSD meetings.

6.3. Perceived usefulness of the process for the CSOs

Evaluation Question 5:
In what ways do CSOs find the process useful? What are its strengths and weaknesses? Has it fulfilled stakeholders' expectations?

The question was answered based on the data collected through in-depth interviews with the sample CSOs (members and non-members of the Contact Group and CSOs no longer participating in the process), the on-line survey of CSOs. Based on these findings a conclusion is drawn below on the question of usefulness, including aspects that could be considered to increase the usefulness to CSOs.

<table>
<thead>
<tr>
<th>Criteria to assess usefulness of CSO process</th>
<th>Evidence that supports or contradicts criteria</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>How the CSD adds value to CSOs</td>
<td>The following are the most valuable aspects of the CSD for CSOs: face-to-face interaction with DG Trade; opportunities to ask questions and get instant responses; clarifications on progress of trade negotiations; opportunities to listen to positions of other CSOs; networking.</td>
<td>CSO survey open questions</td>
</tr>
</tbody>
</table>
| Perceptions of strengths and weaknesses²⁰ | **Strengths:** <ul><li>Management of meetings and relevance of topics (>70% rated very effective / quite effective)</li><li>Open door to DG Trade = good practice</li><li>Forum for discussion with all interest groups</li><li>Access to chief negotiator /</li></ul> | Interviews with Contact Group / non-members of the CG  
CSO survey  
Observation at CSD meetings |

²⁰ A shortlist of issues is presented here, as strengths and weaknesses are highlighted throughout the answers to the evaluation questions.
It is recognised that the CSD is one of many channels to receive feedback and that feedback via the CSD can be quite general/there are more in-depth discussions held elsewhere. There are differing views on the practical usefulness of the exercise. Within the evaluation process, we were unable to detect the extent that the speaker and the way he or she structures the presentation to CSOs have an impact on the quality of inputs received. We detected some caution within the house with regards to how to manage potential conflictual situations, for example because of the involvement of diverse interest groups in CSD meetings.

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#### Criteria to assess usefulness of CSO process

<table>
<thead>
<tr>
<th>Evidence that supports or contradicts criteria</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>How the CSD adds value to CSOs</td>
<td></td>
</tr>
</tbody>
</table>

**The following are the most valuable aspects of the CSD for CSOs:**

- Face-to-face interaction with DG Trade
- Opportunities to ask questions and get instant responses
- Clarifications on progress of trade negotiations
- Opportunities to listen to positions of other CSOs
- Networking

#### Extent that stakeholder expectations are met

Mixed picture on stakeholder expectations: business associations expectations are met (67.7% very or quite satisfied). NGOs are less so (50% very or quite satisfied). Circa 20% are neutral and 20% are dissatisfied with the Contact Group.

A similar mixed picture from interviews

#### Suggestions for possible options for improvements

- Use of electronic media for inputs from CSOs outside Brussels identified as existing idea within DG, largely considered to be relevant provided that limited participation / evidence of how on-line participation can be well managed elsewhere in EC.

- Flagship events / debates/ workshops to invigorate process 1 or 2 x year.

- Provision of information on negotiated

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21 For the sake of readability, this is not an exhaustive list. It captures the main points expressed from several sources.
Conclusion:

The evaluation provides evidence to confirm how CSOs find the CSD process useful and their perceptions of strengths and weaknesses. Stakeholder expectations are partially met, and those who engage in the process see its value, but there are underlying frustrations. When asked what might reduce the appeal of the process, the mismatch between the desire to contribute and the perceived lack of influence comes to the fore as do the resource implications for some CSOs. This raises questions as to what if anything can be done to allow expectations to be better met.

CSOs appreciate many aspects of the process. Key elements include the opportunity for: face-to-face interactions with DG Trade; to ask questions and get instant responses; clarifications on progress of trade negotiations and to listen to the positions of other CSOs, including those with opposing viewpoints, which might not otherwise be heard. Main strengths relate to the potential access to the relevant people at the DG, the open forum provided for cross-sector discussion and the regular and timely updates on trade negotiations. Main weaknesses relate to the lack of real debate, the general nature of information from the DG and from CSOs and expectations not being well met by the process, for example to be able have a real input / influence into the way that the DG conducts its trade activities. Lack of transparency around the Contact Group is an area that did not come up spontaneously in interviews, possibly due to low awareness, but its inclusion in the survey showed differing perceptions among members and non-members.

A suggestion was also made that if the EC would expect more valuable inputs from the CSOs it should explicitly state in the invitation to the event that it would expect the CSOs to prepare certain types of inputs.

With their differing agendas, organisations representing business are more likely to believe that their expectations have been met than those representing NGOs. This outcome is somewhat predictable given the focus on Trade, yet with the inclusion of a Sustainability Chapter in negotiations, this outcome becomes less acceptable.

6.4. Relevance of CSD for DG Trade

Evaluation Question 6:
In what ways is the CSD relevant for DG Trade?

The evaluators explored how the CSD contributes to the work of DG Trade and could / should this contribution be strengthened in any way. The opinions of the DG were collected by means of in-depth interviews and online questionnaire for DG Trade staff, which only received some 7 responses out of a potential of circa 25 (senior and middle managers).

<table>
<thead>
<tr>
<th>Criteria to assess relevance</th>
<th>Evidence to support or contradict the criteria being met</th>
<th>Source of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevance / usefulness of the CSD for DG Trade</td>
<td>Helps to increase awareness of CSO perceptions, inside the DG this has grown over the last few years.</td>
<td>DG Trade interviews</td>
</tr>
<tr>
<td></td>
<td>Mixed views: for some this is an exercise in information provision and trying to increase transparency, but the real discussions happen elsewhere including in bilateral meetings, for others this is an opportunity for new ideas and a useful way of channelling non-governmental comments.</td>
<td>DG Trade interviews</td>
</tr>
<tr>
<td></td>
<td>The agenda of topics for discussion in the CSD is not driven by the policy units</td>
<td>Observation / CSD team</td>
</tr>
<tr>
<td></td>
<td>Structured processes for interaction with Civil Society are in place in equivalent organisations (USTR, WTO, etc.) and there is often a strong link between civil society dialogue and public relations/ communication</td>
<td>Benchmark interviews with external organisations</td>
</tr>
<tr>
<td></td>
<td>Negative media attention / blogs re DG handling of TTIP despite significant additional efforts being made.</td>
<td>Desk research</td>
</tr>
<tr>
<td>Fit with overarching goals of the DG:</td>
<td>Accepted staff view that important to listen/hear Civil Society</td>
<td>Interviews with staff</td>
</tr>
<tr>
<td>• Creating global system for fair /open trade</td>
<td>CSD communication = broad alignment with goals</td>
<td>Desk research</td>
</tr>
<tr>
<td>• Opening up markets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Ensuring trade a force for sustainable development</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ways to increase relevance / usefulness to DG</td>
<td>Question marks over the evolution of a more structured internal process on integration of inputs.</td>
<td>Interviews with staff / CSD team</td>
</tr>
<tr>
<td></td>
<td>Different approaches have been tried,</td>
<td></td>
</tr>
</tbody>
</table>
Conclusion:
The Civil Society Dialogue is relevant for DG Trade, but its usefulness could be increased. Managers believe in the political and operational importance of listening and being seen to listen to civil society, but the current process does not sufficiently harness their interest. Consequently they do not drive the process forward. Perhaps this relates to a keen awareness of the shortcomings of the process or it reflects a focus on how to manage CSD discussions, but not how to maximise the usefulness of this interaction for the DG. The CSD allows the DG to have a structured and managed interface with civil society. This is an important outreach activity, which can also provide practical benefits to help staff members to better understand specific concerns / issues that arise and, when relevant, to take this into account in the way that they develop their work.

The CSD is broadly in-line with DG Trade’s Strategic Goals. At an operational level, the CSD provides an opportunity to hear different viewpoints first hand in a mixed-sector forum. For some, this is interesting, but not vital, but others seem to attach more importance to their interactions with civil society via the dialogue. There is a sense that the CSD could be more useful, for example if there was greater diversity of CSOs attending, which it is inferred may result in access to deeper expertise / insights on particular topics. There are question marks as to whether the really critical issues are captured by the current process because many of the attendees are representatives of representative organisations that may be far from the organisations / individuals directly involved in the issues at stake. Many of the same faces tend to sit at the table. Yet, the CSD represents one of many channels used by the DG to interact with specialist and semi-specialist audiences, including dedicated conferences and public consultations.

From an operational management perspective, it seems reasonable to conclude that there are likely to be efficiency gains in key staff members presenting their work first hand in relatively short sessions to interested parties. This seems to be more efficient and transparent than bilateral meetings with all of these groups, even if the DG has an open door policy. Also, the on-going dialogue may be a way to better understand and engage with criticism / inaccurate assessments of the DG’s work.

Other equivalent organisations (USTR, WTO) pay significant attention to processes to manage their relations with civil society, which gives further ground to the need for DG activities in this area.
6.5. Raising public awareness on trade issues

Evaluation Question 7:

Does the CSD process play a role in raising public awareness on trade issues and policies and in encouraging CSOs and their constituencies to participate in discussions with the European institutions?

The evaluation methodology focussed on gathering evidence from desk research and feedback from informed individuals working inside DG Trade and a sample of those working from CSOs currently or formerly engaged in the CSD process. Key findings are presented in the table overleaf.

<table>
<thead>
<tr>
<th>Criteria confirming the role played by the CSD</th>
<th>Evidence to support or contradict criteria</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actions taken by DG Trade to raise public awareness</td>
<td>Aside from press releases, the on-going use of social media (over 5000 followers) and the availability of information on DG Trade’s website there are no targeted actions to raise public awareness of the CSD. This goal is not aligned with the CSD objectives which focus on CSOs not the public.</td>
<td>CSD team; CSD website</td>
</tr>
<tr>
<td>Perceptions of need for increased focus on raising public awareness</td>
<td>Full spectrum of views among the contact group from the need to increase visibility and showcase the CSD as an example of the EC willingness to meet with CSOs in an open format, to those who believe that there is sufficient information available on the website or that there is always scope to do more.</td>
<td>Feedback from Contact Group</td>
</tr>
<tr>
<td>Evidence that the CSD encourages CSOs and their constituents to participate in discussions with the Commission</td>
<td>Advance notice of CSD meetings is posted on-line and registered CSOs are free to participate in discussions at their will. The main reason for attending CSD meetings is to discuss trade initiatives with the DG (76% of CSOs surveyed). 84% always or sometimes disseminate information to their constituencies. Participation in discussions remains</td>
<td>CSD website; CSO survey</td>
</tr>
</tbody>
</table>
The CSD does not play a role in raising public, as opposed to CSO, awareness on trade issues and policies. The dialogue facilitates the participation of CSOs in discussions with the European Commission, but not other European institutions, but there are not actions to encourage new CSOs / constituents to take part.

The CSD does not currently engage with the media. This decision was made, upon the advice of the Contact Group, to keep the CSD as a privileged space for interaction between CSOs and the DG. The main means to spread information about CSD events to the public sphere is via the website and through possible mentions\(^{22}\) on the DG Trade Twitter feed. There is a lot of information on the DG Trade website, but this is unlikely to be found by citizens who are

\(^{22}\) Twitter has been used extensively to highlight the TTIP process.
not in some way connected to or following trade issues. The CSD process facilitates CSO participation in discussions with the European Commission, which is their main reason for attending meetings.

There is currently no active promotion of the process to encourage more CSOs to take part or any mechanisms to try to draw in more sector specific actors on specific topic areas. Meetings are held in English and documentation is also only available in English, usually but not always this acts as a barrier to individuals operating at national level. CSO representatives tend to disseminate information to their members so there is some amplification of information to wider circles. Making electronic versions of documents available on-line, helps to facilitate this transfer of information from participant CSOs to other organisations in their network. Contact Group members are encouraged to disseminate information that they are party to, but information relay is at members’ discretion and the evidence suggests that members have different approaches to dissemination.
7. **EVALUATION RESULTS: EFFECTIVENESS**

This section outlines the main results of the evaluation with regards to Evaluation Questions 8 to 11. It explores the perceived usefulness of the information provided to participants at CSD meetings (5.1) and whether the target groups are reached in an adequate manner (5.2). It also presents the perceptions on the quality of feedback given to the CSOs by DG Trade (5.3) and examines the effectiveness of CSOs' influence on trade policy (5.4). The data collection tools used for answering the Evaluation Questions included in this section encompass in-depth interviews with EC staff and CSOs, on-line survey of CSOs, case studies and participation of the evaluators in a sample of CSD meetings.

7.1. **Perceived usefulness of information provided**

**Evaluation Question 8:**

**To what extent is the information provided by DG Trade at the CSD meetings perceived as new and useful in keeping CSOs informed about the development of policies, progress and state of play in trade negotiations?**

Key findings identified on this point relate to CSOs and to some extent DG Trade staff perceptions of the newness and usefulness of information provided.

<table>
<thead>
<tr>
<th>Criteria considered in the assessment of this point</th>
<th>Evidence that supports or contradicts criteria</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perceptions of newness of information.</td>
<td>&quot;We know what they'll say, they expect us to say what we say...&quot; &quot;There’ll be another round... I don’t think we’ll go, it's getting repetitive... the meetings are getting less and less useful.&quot;</td>
<td>CSO non-members of CG</td>
</tr>
<tr>
<td></td>
<td>Due to ‘leaks’ for example in the TTIP process it is possible to find information presented from other sources.</td>
<td>Interviews with Members and non-Members of the Contact Group.</td>
</tr>
<tr>
<td></td>
<td>Evidence of on-going significant differences between numbers of CSOs registering and attending suggests maybe reflective of the rolling nature of dialogue, but also suggests high priority not attached to content (between 27 and 58% of registered participants did not turn up).</td>
<td>Observations at CSD meetings</td>
</tr>
<tr>
<td>Perceptions of usefulness of CSD in keeping CSOs informed.</td>
<td>Survey respondents were asked to rate 11 aspects of CSD meetings. The quality of information provided at meetings achieved the lowest score,</td>
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</table>
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Criteria considered in the assessment of this point

<table>
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<tr>
<th>Evidence that supports or contradicts criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sources of evidence</td>
</tr>
<tr>
<td>Perceptions of newness of information.</td>
</tr>
<tr>
<td>“We know what they’ll say, they expect us to say what we say…”</td>
</tr>
<tr>
<td>“There’ll be another round… I don’t think we’ll go, it’s getting repetitive…”</td>
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</tr>
</tbody>
</table>

Perceptions of usefulness of CSD in keeping CSOs informed.

Survey respondents were asked to rate 11 aspects of CSD meetings. The quality of information provided at meetings achieved the lowest score, less than half (45%) indicated it was very or quite effective. Only 54.8% are very or quite satisfied with the CSD process.

There seems to be consensus that the right topics are being discussed. >70% reported topics very and quite effective.

There is an underlying desire for a more technical level of discussion / discussion on more different perspectives.

Conclusion:
The answer to this question has been covered by Evaluation Questions 4 and 5, which also concern the quality of information and the usefulness of CSD process. The survey indicates a lower level of satisfaction with the content of CSD meetings and feedback from those who attend meetings is that it is often possible to find the information elsewhere or that the information is already to some extent known because it is of a very general nature. DG Trade’s negotiating partners do not always have the same attitudes towards confidentiality as the DG.

7.2. Reaching target audience

Evaluation Question 9:
Is the CSD reaching its target audience adequately? Are the tools and channels used appropriate?

This question concerns levels of involvement of CSD target audiences and ways that they are engaged in the CSD process. There is no further explanation provided in the Terms of Reference to the evaluation with regards to criteria to define adequacy of reach and the objectives of the CSD do not provide an indication of target levels of reach / participation. Reach is considered on two axes: direct reach relating to participation in meetings and indirect reach relating to the relay of information via the website and or other CSO meeting participants.

Criteria used to assess the evidence | Evidence which supports or contradicts the criteria | Sources of evidence |
-------------------------------------|-----------------------------------------------|---------------------|
It is possible to define target audiences | Civil society organisations (CSOs), including NGOs, employers’ organisations, trade union organisations, | Evaluation Terms of Reference |
<table>
<thead>
<tr>
<th>Terms of Reference</th>
<th>Channels and tools used to reach these audiences</th>
<th>Numbers of CSOs reached and characteristics of this reach</th>
</tr>
</thead>
</table>
| environmental and consumer associations, business associations, faith-based groups as well as EESC reps, which are:  
  - Based in the EU;  
  - Not-for-profit;  
  - Listed in the EU Transparency Register.  
There is no definition of the total target universe for the CSD, although 330 CSOs are registered in the CSD database. Between 2007 and 2013, the total number of participants in CSD meetings per year ranged between 855 and 624. There were 436 participants in the 11 meetings held over the last year. | CSD website and information on the website, including advance warning of meetings, background documentation and minutes. There is a Twitter feed, which has been used extensively to communicate about TTIP, but there seem to be limited references to CSD.  
Face-to-face meetings with chief negotiators (between 21 and 37 per year) including yearly meetings with the Commissioner and Director General. | Circa 6600 registrations in the Transparency Register, 378 are included in the CSD database;  
Survey data suggest that 46% of CSOs reached are based in Belgium;  
There were no responses recorded for Bulgaria, Croatia, Czech Republic, Estonia, Greece, Lithuania, Luxembourg and Slovakia;  
Business associations / confederations and NGOs combined represent over 75% of respondents; |

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The highest proportion of survey respondents belong to the "Trade (export-import)" sector (30%), "Agribusiness / Food & drink" (27%) and "Manufacturing / Industry" (25%).

<table>
<thead>
<tr>
<th>Evidence to suggest adequacy of reach.</th>
<th>There may be an optimal number of participants in CSD meetings to facilitate discussion / a monster process could make the CSD unwieldy.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>There is a sense that CSOs tend to be Brussels-based and there may be a need for a push for more national level input / there are question marks over the representativeness of CSOs.</td>
</tr>
<tr>
<td></td>
<td>Awareness of the CSD is ok (&gt;60% to a great extent and to some extent), but levels of awareness are lower among NGO communities. Circa 45% of NGOs felt their sectors are not adequately represented.</td>
</tr>
</tbody>
</table>

| Interviews with DG Trade staff | Interviews with DG Trade staff | CSO survey |

**Conclusion:**

The DG’s current approach to reaching its target audience is adequate for the CSD’s information update sessions. The DG does not take proactive steps to increase participation in the CSD. Those who are interested in keeping up-to-date with DG Trade negotiations and policies know where to look for information on upcoming meetings. NGOs are reported not to be adequately represented, yet it seems that some are disaffected because their expectations cannot be met. Current tools and channels are appropriate to the scope of the CSD. The meeting format is appreciated as an opportunity for face-to-face interaction with EC officials. The website provides an accessible information repository for meeting data, even if this is not always up to date. However, if the DG wants a more useful and informative debate then this approach is not adequate to reach the more specialised target audience required. This is the key question to be answered before deciding on alternative channels and tools, which should be selected to suit the purpose of the exercise. There is some talk of taking discussions on-line / web-streaming, which current participants find interesting, yet they do not feel that location is an issue. It seems likely, but it is not possible to confirm, that this alternative approach would not lead to a significant increase in participation, because it is the content of the CSD that is its biggest limitation not the format.
There are two possible target audiences: those who already fulfil the three participation criteria and those who could fulfil the participation criteria. Whilst there may be aspirations for a wide, more inclusive reach of civil society organisations, in reality the current target audience for the CSD is the list of organisations that fulfil the criteria of being: not for profit, based in the EU, and registered in the Transparency Register. The evidence suggests that the Transparency Register is not in itself a limiting factor.

If the Transparency Register is the maximum possible target group, then the CSD population (those who have registered for a meeting) is a small percentage (circa 7.6% of possible relevant organisations in this target population\(^24\)). It is not possible to assess whether there is more scope to draw in additional CSOs from the already existing list of organisations in the Transparency Register.

The 2006/7 evaluation found that the number of participants from the newer eastern Member States was low and the suggestion was made to consider taking the dialogue to these countries to facilitate their participation. This was found to be not particularly successful and highlights the difficulties in investing in new and uncertain approaches.

Today, most of the CSOs which take part in CSD meetings are based in Brussels. This is to some extent logical given that Brussels is the seat of numerous organisations whose main purpose is to represent the interests of their member organisations to the European Institutions. Given the rolling nature of the dialogue and the relatively short notice of meetings it is difficult to plan for meetings far in advance, unless attendance is part of an individual’s monthly activities, for example. Many of the organisations that participate in CSD meetings attend very regularly, particularly business CSOs\(^25\), which leads to a sense of the same faces round the table, their more general level of expertise and may explain the doubts expressed over CSO contributions by some CSOs and DG staff.

The second possible target audience are those who are not registered in the Transparency Register, but that could make valuable contributions to the discussion. For the time being, there is no additional or targeted promotion of the CSD, for example in relation to specific issues. This type of activity could be useful, for example, if the DG wanted to enhance the expertise / insights around the table.

### 7.3. Quality of feedback to the CSOs

#### Evaluation Question 10:

**How do participants rate the feedback offered by DG Trade about the ways in which their views are taken into account?**

In order to be able to fully answer the question, the evaluators took into account the following aspects:

\(^{24}\) Excluding consultancies and local and regional authorities, the CSD database is circa 7.5% of total membership of the Transparency Register.

\(^{25}\) Survey respondents indicated that >40% participate in all or most meetings.
The evaluators collected this feedback using the on-line survey of the CSOs and the in-depth interviews with a sample of CSOs that reduced their participation in the process. Some of the findings were also triangulated by the findings from the on-line survey with DG Trade middle and senior managers, the observations made at the CSD meetings and the interviews with the panellists after the meetings.

<table>
<thead>
<tr>
<th>Criteria to assess the quality of the feedback</th>
<th>Supporting evidence</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Format of feedback/ how this is taken into account</strong></td>
<td>Information provided in meetings tends to be general and can usually be found elsewhere. It is not necessary to go through the information that has already been posed on the CSD site – it can be assumed that participants have read this information.</td>
<td>Interviews with CSOs.</td>
</tr>
<tr>
<td></td>
<td>Answers to questions in CSD meetings</td>
<td>Observations at CSD meetings</td>
</tr>
<tr>
<td></td>
<td>The opinions of CSOs on trade negotiations are sometimes taken into account and used during next negotiation rounds, after which the outcomes of those rounds may be reported back to the CSOs.</td>
<td>Interview with Trade staff</td>
</tr>
<tr>
<td></td>
<td>Report from a CSO that after pressure on a specific issue via the CSD this was taken into account by the DG.</td>
<td>Interviews with CSOs</td>
</tr>
<tr>
<td><strong>CSOs’ levels of satisfaction</strong></td>
<td>Only 47% of the respondents to the CSO survey indicated any positive levels of satisfaction with the feedback they receive; 23% of the CSOs are dissatisfied with the feedback quality; 25% of the CSOs are dissatisfied with the way their inputs are being handled by DG Trade</td>
<td>CSO survey</td>
</tr>
<tr>
<td></td>
<td>Most meeting participants listen, but do not pose questions, it is unclear whether they have no questions to ask.</td>
<td>Observations</td>
</tr>
<tr>
<td></td>
<td>Reports that NGOs are not as involved as they could be because of stretched resources and a sense that the time spent in CSD meetings is ineffectual. On the other</td>
<td>Interviews with CSOs</td>
</tr>
</tbody>
</table>
Conclusion:

From the evidence, there are very mixed levels of satisfaction with feedback received from DG Trade. A sizeable proportion of participants seem to be dissatisfied with this element. It is difficult to quantify the level of feedback on how CSO views are taken into account, because for the most part there seems to be an acceptance that views are not really taken into account. Some exceptions to this were identified and positive examples provided. Those representing NGOs suggest a level of dissatisfaction from the process because of a belief / experience that inputs will not really be taken into account. CSD meetings are standalone events. Questions posed in a particular session are answered in that session because the next meeting will be on a different topic, involving different EC staff and possibly different CSO participants.

7.4. Influence on trade policy

Evaluation Question 11:

How effective is the process in providing participants with a forum in which to present their ideas and position papers for influencing trade policy?

This question can be answered by looking in depth at three aspects:

- How meetings function and the different roles played by the Commission and CSO participants
- Perceptions of possibilities for CSOs to influence trade policy
- Usefulness of the CSD for CSOs influencing trade policy
- Attitudes and use of the opportunity to present position papers

The methods used to gather data needed to answer this question included in-depth interviews with EC staff and sample of CSOs; on-line surveys of CSOs and DG Trade staff; observation of meetings; and desk research.

The findings and evidence used to answer this question are presented in the table below.

<table>
<thead>
<tr>
<th>Criteria to assess effectiveness of the forum and position papers</th>
<th>Findings/evidence</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSOs present their ideas at</td>
<td>From the meetings attended by the evaluation team, few CSOs present</td>
<td>Observation</td>
</tr>
</tbody>
</table>
| meetings | ideas. Also, ideas tend to be presented in the format of questions based on the presentation given by the Commission / other experts invited by the Commission. These are information giving sessions rather than discussions.  

The DG does not pose questions to the audience or describe the issues taken into account in the EC stance, thus there is little for the audience to actually take note of.  

There is no exchange of ideas between CSO participants as questions are directed at the EC representative. Also there is limited networking between participants before, during and after meetings. Levels of proactive engagement are low in meetings, with most CSOs listening rather than asking questions.  

Discussions are structured with, for example three questions asked by different CSOs and these being answered by the European Commission. There is no more organic discussion as such where one idea leads to another. To the outsider it appears that ideas / positions are likely prepared in advance.  

Meeting dynamics work relatively well. They are long enough and individuals who have questions have sufficient time to ask them.  

However, there is some repetition of information provided on-line at the start of meetings. It was suggested that could be collected in advance to make the meeting more efficient. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Perceived importance of influencing trade policy</td>
<td>Influencing trade policy is an important reason for participating (&gt; 50%) but CSOs are very sceptical</td>
</tr>
</tbody>
</table>
### Timing of the meetings in the policy-making process

<table>
<thead>
<tr>
<th>CSOs’ view</th>
<th>Staff view</th>
</tr>
</thead>
<tbody>
<tr>
<td>About 51% think that meetings are most useful before EU trade initiatives start on a particular topic, 46% during, and only 3% after;</td>
<td>Some staff consider meetings best during a DG Trade initiative;</td>
</tr>
</tbody>
</table>

### Position papers

<table>
<thead>
<tr>
<th>CSOs’ view</th>
<th>Staff view</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSOs can submit position papers, but do not take the opportunity to do so: only 5 submitted in 2013;</td>
<td>From limited input to the staff survey, DG staff members were less convinced of the value of position papers, but some think guidelines could help CSOs, as could scheduling internal discussions on CSO position papers and a position paper template.</td>
</tr>
<tr>
<td>Yet CSOs think this is important (88%) and many would welcome guidelines (78%) and a schedule of calls for position papers (80%) and more importance attached to these by the DG (72%).</td>
<td></td>
</tr>
</tbody>
</table>

### Conclusion:

The CSD is not a very effective process to allow CSOs to present their ideas, this assertion is confirmed by the fact that there is no real discussion in meetings and most participants do not speak. These are information giving sessions where participants can ask questions on the presentation made. It could be assumed that

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26 http://trade.ec.europa.eu/civilsoc/positionpapers.cfm
an effective forum would result in a lot of discussion between the Commission and different CSOs. As highlighted in other conclusions, the type of information provided by the Commission is considered by CSOs to be quite general.

The types of participants (not all but many) are considered by DG staff to have a general type of knowledge; they are not necessarily specialists on the topic area. These two aspects do not naturally lead to much discussion, aside from requests for clarifications and explanations of experiences from within different sectors to the DG.

The way that meetings are conceived is not necessarily supportive of CSOs presenting their ideas because the Commission presents information not the other way round. Although members of the Contact Group have an input into the topics discussed in meetings, CSD meetings are somewhat top-down with the starting point for discussions being the Commission’s own presentation of information. There are no CSO presentations.

With regards to position papers, the very low number of papers submitted suggests that there is something wrong. From the interviews, it was suggested to sometimes be difficult for EU-level representative organisations to put forward positions because of diverse positions among members. Some within the DG were not convinced of the quality of position papers. However, the results of the survey suggest a strong interest in keeping the position paper option alive. The survey explored whether more guidance from the DG would be useful to enhance the information provided by CSOs and other results suggest that if greater emphasis was placed on this aspect by the DG then CSOs would most likely be responsive. The question here is whether the DG needs such position papers. There is already a consultation process, by which external individuals and organisations, including many of the CSD participants, are able to put forward their response to new initiatives in a transparent, structured way. The consultation process is a formal part of the DG process / way of working. Meanwhile position papers are not part of any formal process and, therefore, they are not actively sought by the DG. As a result there is a sense that no action will be taken and correspondingly CSOs show limited action in this area.
8. EVALUATION RESULTS: EFFICIENCY

This section presents the key results of the evaluation regarding the five evaluation questions in the area of efficiency. It offers evidence of the means and quality of dissemination of information from the CSD meetings (section 7.1), comments on the adequacy of the resources allocated to the process (7.2). The section also explores the organisational and administrative procedures in place in the process and discusses whether any of those can act as barriers to participation in the CSD (7.3 and 7.4). The subsequent sub-section (7.5) considers whether the way that participants’ contributions are recorded in an adequate way. The final point (7.6) comments on the features of the monitoring system currently in place as well as discusses the usefulness of this system.

Evidence used to answer these questions is drawn mostly from desk research, including in-depth analysis of the information available on DG Trade’s CSD website, discussions with the DG Trade CSD Team and the Contact Group members, as well as the two on-line surveys and review of similar CSD processes in other DGs.

8.1. Dissemination of information

Evaluation Question 12:

How is the information provided by DG Trade through the CSD and CG disseminated by the CSOs to their constituencies?

Finding out what happens to information communicated through the CSD process is one of the key areas for exploration, which has been identified by DG Trade. The data necessary to answer this question were collected through the online survey of CSOs and in-depth interviews with a sample of CSOs and the members of the Contact Group. The evaluators explored how the CSD contributes to the work of DG Trade and could / should this contribution be strengthened in any way. The opinions of the DG were collected by means of in-depth interviews and online questionnaires for DG Trade staff.

<table>
<thead>
<tr>
<th>Evidence of dissemination and mechanisms</th>
<th>Evidence that supports or contradicts</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information dissemination from CSOs</td>
<td>Information spreads beyond the meetings reflecting the benefits of having multiplier organisations involved.</td>
<td>CSO survey, interviews with CSOs</td>
</tr>
<tr>
<td></td>
<td>58% disseminate the information from CSD meetings to their members and constituencies “always”, 27% disseminate sometimes, 15% disseminate rarely or never</td>
<td></td>
</tr>
<tr>
<td>Channels</td>
<td>38%: emails to member organisations, 33%: discussions / meetings, 18%: newsletter,</td>
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Evidence of dissemination and mechanisms

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</tr>
<tr>
<td>Channels</td>
</tr>
<tr>
<td>38%: emails to member organisations, 33%: discussions/meetings, 18%: newsletter, CSO survey, interviews with CSOs</td>
</tr>
<tr>
<td>10%: posting on the COS’s website; 1%: social media (Twitter)</td>
</tr>
<tr>
<td>Consistent findings through the CSO interviews;</td>
</tr>
<tr>
<td>Contact Group - CSOs</td>
</tr>
<tr>
<td>[The Contact Group’s] task is to help with the wide circulation to the wider group of their constituencies.’</td>
</tr>
<tr>
<td>Most Contract Group members are disseminating information to their members. However, there are differences in the perception of the need to disseminate information and the practice of doing so.</td>
</tr>
<tr>
<td>32% of CSOs have received information on the CSD from the Contract Group. Circa one third (34%) disagree that the Contact Group helps to ensure wide circulation of CSD information.</td>
</tr>
<tr>
<td>Contact Group terms of reference</td>
</tr>
<tr>
<td>Interviews with the CG members</td>
</tr>
<tr>
<td>CSO survey</td>
</tr>
</tbody>
</table>

Conclusion:

Most information dissemination on the CSD takes place electronically. This supports the need for information to be made available on-line and in electronic versions; not just as paper hand-outs in meetings. Most participants at CSD meetings are forwarding some information to their constituencies, at least some of the time. This is one of the benefits of the typical profile of a CSD meeting attendee, who is a representative of a wider group of interests/organisations; a type of multiplier.

Contact Group members also forward information to their member organisations, according to its perceived relevance. There are differences of approach to this with some being more systematic than others in their dissemination actions. There are also differences in opinion on the need to do so, with a few members seeing their role as providing information to the Commission and not the other way around, despite this being part of the remit of the Contact Group. Despite information on the CSD web that every CSO is able to choose one Contact Group member as their contact group, for the most part this does not seem to be happening, unless a CSO is automatically represented by the Contact Group member because its organisation belongs to that member’s network.
8.2. Allocation of resources

Evaluation Question 13:

*Are the resources allocated to the process commensurate with its objectives?*

To answer this question evidence was collected with regards to financial and human resource allocated to the CSD process, which is currently run from DG Trade's Information, Communication and Civil Society unit.

The starting point for answering this question relates closely to the conclusions presented earlier for Evaluation Question 3, that the CSD process does not have objectives, but rather goals. Objectives are narrow and focused as opposed to goals which are broad statements of intent. When taking this into account it is not possible to answer the evaluation question as posed above. However, through interviews with DG Trade staff and the review of CSD processes in other Directorates-General the evaluators are able to offer certain findings and conclusions relating the resources allocated for CSD in DG Trade.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Findings</th>
<th>Sources of evidence</th>
</tr>
</thead>
</table>
| Appropriate levels of human resource   | Tight resourcing (until recently only 1 person; at present 1.5.)  
4 out of 7 DG Trade survey respondents reported that their existing workload and commitments prevent /hinder their engagement with the CSD to good extent;  
At the same time, 4 of 7 DG Trade survey respondents found that "insufficient support to prepare CSD meetings" hinders their engagement very little or "not at all", suggesting the support offered is sufficient. | CSD team                          |
|                                         |                                                                                                                                          | DG Trade survey                   |
| Sufficient budget                       | Travel is financed from a dedicated line, while meeting rooms is part of a general budget.  
There is a need for a streamlined, resource efficient approach | CSD team                          |
|                                         |                                                                                                                                          | DG Trade Communication Strategy 2014; |
| Travel allowance to match demand        | The use of the facility is limited, most likely due to the fact that almost 50% of CSOs are Brussels-based (see EQ 9).  
68% had never made use of the travel budget – only 17% had.  
Just over half satisfied with resources allocated to the CSD (56%) | CSO survey                         |
|                                         |                                                                                                                                          | CSO survey                         |
Conclusion:

It is concluded that the resources are sufficient for what the CSD is, but probably not to what it might aspire to be. The current process is focussed on relaying information to mainly Brussels-based CSOs who are not dependent on DG Trade for resources to enable them to attend. There is no real promotion of the CSD or efforts to attract additional CSOs with more specialist insights to the process. Given the tiny team working on the CSD, it seems that additional actions would most likely require additional human resource. This is a low cost model which fits with the call for budget streamlined communications described in the Communication Strategy. It also reflects the current budgetary reality in Brussels, where there is a reduction of staff in all Commission departments and a corresponding reduction in operational and administrative budgets.

Yet there is clear evidence both inside and outside the house that participants are very satisfied with the number, frequency and management of CSD meetings. However, there is also evidence that different types of CSOs have different resource needs. Some NGOs may find themselves too resource strapped to allocate time to participate in the CSD, particularly given the fact that the information tends to be general and there is no real debate. Funds are available to cover travel, but not a per diem. However, it would be incongruous to support the costs of attending a meeting without requiring their input.

The low cost model, therefore, seems to favour certain types of CSO, including those who are located in Brussels, have funds available and are able to operate in English, given that no translation services made available at meetings. Achieving a more level playing field might require a different prioritisation of resources within the DG.

8.3. Organisational and administrative procedures; administrative barriers to participation

Evaluation Questions 14 and 15:

To what extent do the existing organisational and administrative arrangements lead to an efficient consultation process?

Are there administrative aspects that act as a barrier to participation?

These two questions have been integrated as similar evidence is required to answer these points. To answer the questions, we took into account desk research on available documentation on the DG Trade website and Europa, interviews with the DG and CSOs and the surveys undertaken. For this question, we did not consider human and financial resources, as these aspects are covered in an earlier question.
Administrative barriers are difficult to detect because they frequently relate to the intangible aspects of the way that an organisation works. This challenge has been somewhat exacerbated by the very low response rate to the DG staff survey. The available evidence is not sufficiently substantial to allow deep insights into the way that the DG works.

Nonetheless, a number of aspects were detected which provide insights into possible administrative barriers although it is not possible to quantify the extent of their impact.

Three criteria are used to assess administrative and organisation aspects of the CSD as follows:

- Management
- Staff attitudes and perceptions
- Internal structures and processes

<table>
<thead>
<tr>
<th>Criteria to identify internal limitations</th>
<th>Evidence and comments</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management</td>
<td>The Information, Communications and Civil Society unit is responsible for the CSD and tends to propose themes for CSD meetings to policy units. Policy units do not tend to ask for meetings. The 2012 change of location of the CSD team is not perceived to have had impact on arrangements. There is evidence from benchmarking organisations that civil society dialogue type activities are typically closely linked with/part of public relations. There are no targets / specific objectives to stimulate staff to create benefits from CSD involvement.</td>
<td>Terms of Reference / CSD team</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact Group interviews</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Benchmark interviews</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Observations</td>
</tr>
<tr>
<td>Staff attitudes and perceptions</td>
<td>Administrative barriers to participating in the CSD are not foremost in the minds of DG managers. Since the previous evaluation there is a much stronger sense of the potential value of engaging in the CSD within the DG. This makes it easier for the CSD unit to engage staff in the process. The approach and levels of involvement of the Commissioner can influence perceptions of the dialogue. Evidence from other DGs suggests the</td>
<td>Interviews with DG staff</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interviews with DG staff / CSD team</td>
</tr>
<tr>
<td></td>
<td></td>
<td>DG Trade staff interviews</td>
</tr>
</tbody>
</table>
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Three criteria are used to assess administrative and organisation aspects of the CSD as follows:

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<td>Desk research</td>
</tr>
<tr>
<td>Internal structures / systems</td>
<td>Each CSD meeting is an ad hoc event, which is not required by any of the DGs formal processes, for example for the development of policy / the negotiation of trade agreements. There is no central guidance inside the DG with regards to what to do with CSD inputs; this is left to staff discretion. There are doubts as to the feasibility / desirability of requiring staff to report formally on how they have addressed issues raised in meetings. CSOs also provide inputs via other routes, including bilateral meetings and public consultation exercises. Staff members are not dependent on the CSD for insights into the area that they are working on. It is considered to be one of several sources of information.</td>
<td>Desk research, DG Trade interviews, Surveys and interviews, DG Trade interviews</td>
</tr>
<tr>
<td>Experience of informed independents</td>
<td>The management and chairing of meetings are considered to be their most effective features (73% of respondents). The number and timing of meetings is adequate 69%</td>
<td>CSO survey</td>
</tr>
<tr>
<td>Evidence from benchmark organisations</td>
<td>Civil society dialogue and external communication are part and parcel of the same operation, the former providing content for the latter. Effective discussions require well thought through strategies to stimulate and facilitate interactions between different individuals / groups</td>
<td>USTR, Mindlab Denmark</td>
</tr>
</tbody>
</table>

**Conclusion:**

Based on internal and external views, it can be concluded that existing organisational arrangements are efficient with regards to ensuring that an appropriate and timely number of meetings are held and that these are well organised and chaired. However, there are several features of the way that the CSD is handled inside the DG that are likely to restrict or limit its impact.
As highlighted elsewhere, there are no specific objectives for the CSD either for the process as a whole or for how the CSD should be managed internally. The CSD is a dialogue not a formal consultation and as such it falls outside internal procedures with regards to how information flowing to the Commission via the CSD is handled. There are no rules or guidelines on this aspect and it is left to the discretion of DG Trade managers, who report that they mostly take inputs into account in their own work, but are not obliged to escalate the information or report on how it has been taken into account. Doubts expressed on the relevance of introducing an internal procedure for this seem to relate to concerns over additional administrative burden, the fact that the quality of information received does not necessarily warrant further action, and that there are many other routes to receiving useful inputs that may shape policy.

As CSD information is not required to allow the Commission to complete a formal procedure, the impetus for collecting information from the dialogue is much reduced. Also, staff report that bilateral meetings can offer much more in-depth discussion than is currently taking place via the CSD. These meetings are not transparent. There seems to be a contradiction between the emphasis placed on a transparent dialogue process, which is mainly concerned with providing general updates and answering questions on these updates, but which is presented as providing opportunities for debate, and the open door policy of the DG whereby CSO and other organisations engage in more detailed bilateral discussions take place behind closed doors. The fact that the CSD is organised within the Information, Communication and Civil Society unit is in-line with the understanding of other similar organisations, such as the USTR, that civil society dialogue is part of the approach to managing public relations. However, this together with the fact that policy units do not require CSD inputs to enable them to do their work can be considered to provide a barrier to a more efficient process. Whilst meetings are considered to be well managed, a real debate requires a more proactive approach that would need to be driven by a perceived internal need/requirement. Debates involving stakeholders do not just happen. As evidence from the Danish benchmark suggests, they need to be designed and facilitated with skill to allow outputs to be generated. Debates need to be well prepared, ensure that the right people are around the table, there may be a need for an exchange of views in advance and/or confirmation of the key issues where the Commission wants input and expectations from participants. Current resources are unlikely to be sufficient to allow a more dynamic approach.

8.4. Adequacy of recording participants’ inputs

Evaluation Question 16:

To what extent is the way DG Trade’s input and participants’ contributions are recorded adequate?

The evaluators set to assess the extent to which the EC staff and participants involved in the CSD process perceived the record of inputs to be accurate, useful and serving the intended purpose. The evidence for answering this question and their sources are presented in the
As highlighted elsewhere, there are no specific objectives for the CSD either for the process as a whole or for how the CSD should be managed internally. The CSD is a dialogue not a formal consultation and as such it falls outside internal procedures with regards to how information flowing to the Commission via the CSD is handled. There are no rules or guidelines on this aspect and it is left to the discretion of DG Trade managers, who report that they mostly take inputs into account in their own work, but are not obliged to escalate the information or report on how it has been taken into account. Doubts expressed on the relevance of introducing an internal procedure for this seem to relate to concerns over additional administrative burden, the fact that the quality of information received does not necessarily warrant further action, and that there are many other routes to receiving useful inputs that may shape policy.

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Whilst meetings are considered to be well managed, a real debate requires a more proactive approach that would need to be driven by a perceived internal need/requirement. Debates involving stakeholders do not just happen. As evidence from the Danish benchmark suggests, they need to be designed and facilitated with skill to allow outputs to be generated. Debates need to be well prepared, ensure that the right people are around the table, there may be a need for an exchange of views in advance and/or confirmation of the key issues where the Commission wants input and expectations from participants. Current resources are unlikely to be sufficient to allow a more dynamic approach.

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<table>
<thead>
<tr>
<th>Criteria to define recording inputs</th>
<th>Evidence</th>
<th>Sources of evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minutes from the meetings</td>
<td>Minutes are taken at each CSD meeting to provide a record of inputs made by the Commission and by meeting participants. Minutes are also taken at Contact Group meetings. There was a correspondence between notes taken by evaluators and minutes taken in CSD meetings observed (where minutes were made available). Recording of the participant’s inputs and contributions was not brought up as an issue, but one of the interviews, where the interviewees suggested dissatisfaction with the CSOs inputs are not translated to policy change</td>
<td>Observation of the CSD meetings by the evaluators; Observation In-depth interviews with CSOs</td>
</tr>
<tr>
<td>Information available online</td>
<td>An agenda is published in advance of each meeting, listing participants and registered CSOs. Minutes are also provided on-line. Minutes from Contact Group meetings are not provided online.</td>
<td>Desk research: DG Trade website</td>
</tr>
<tr>
<td>CSO position papers</td>
<td>13 position papers have been provided by CSOs since 2010 to date signifying a low take up by CSOs. It was not possible to detect whether or not feedback was provided on these papers, but it is assumed (to be checked) that these were simply posted online.</td>
<td>CSD website[^27]</td>
</tr>
</tbody>
</table>

**Conclusion:**

The way that DG Trade’s input and participants’ contributions are recorded appears to be adequate. There may be differences of opinion on this point among CSOs, but the fact that there was only one unsubstantiated voice of criticism, suggests it is not an area of significant concern. This is also confirmed by our observations at CSD meetings. Minutes from the Contact Group are not posted on-line, which does not support transparency.

The one area that seems to need to be addressed relates to the fact that the minutes of Contact Group meetings are not posted on-line. This is likely to contribute to the low levels of awareness of the Contact Group and what it does. The fact that most CSOs have not selected a Contact Group member as their contact point for information unless they are part of an association’s network, means that any flow of information to and from the contact Group is opaque.

Recording the inputs seems not to be the key problem perceived by the CSOs, it is more of how the recorded inputs are being handled afterwards, i.e. whether or not the EC acts upon them. The evidence available through the DG Trade staff survey (see EQs 5, 14 and 15) and the feedback gained from the CSOs through the survey and the interviews suggests that the EC is reluctant to take up CSOs inputs in a meaningful way, or, at best, fails to communicate to the CSOs that it has done so.

**8.5. Usefulness of the existing monitoring tools**

**Evaluation Question 17:**

Is the information provided by existing monitoring tools useful? How can this information be fed into the process?

In order to answer this question the evaluators reviewed the features of the monitoring system currently in place and considered evidence to confirm the usefulness of the system. The evaluators based the answer to this question on extensive desk research (mainly using the existing DG Trade’s CSD website and the links to documents and statistics it provides), in-depth interviews with EC staff and the evaluators’ assessments based on their evaluation experience. Our own experience as evaluators also came to the fore here.

<table>
<thead>
<tr>
<th>Criteria to assess the monitoring system</th>
<th>Findings / comments</th>
<th>Evidence source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring tools in existence</td>
<td>Meeting participant questionnaire comprised of relevant questions, but used for each meeting.</td>
<td>Observation</td>
</tr>
<tr>
<td>Participation in monitoring system</td>
<td>Low numbers of meeting participants complete the questionnaire.  ‘The questions never change; I’ve stopped filling it in...’ Many of the same people are asked to complete a form at each meeting (circa 25% attend all or most CSD meetings).</td>
<td>Observation  Example quote from CSO participant  CSO survey</td>
</tr>
<tr>
<td>Evidence of year-on-year data compilation</td>
<td>There are inconsistencies in that way that CSD meeting data is collected and reported. Contact Group meetings are not public and, therefore, do not appear in the database statistics, causing discrepancies between the data from different sources</td>
<td>Desk research  CSD Team</td>
</tr>
<tr>
<td>Categories of CSOs used in the internal monitoring spread sheet</td>
<td>The categories used to collect data are not mutually exclusive (e.g. &quot;Non-governmental organisations, platforms and networks and similar&quot; and &quot;Pan European NGOs&quot;)</td>
<td>CSD Team: internal monitoring spread sheet</td>
</tr>
</tbody>
</table>

**Conclusion:**

The information provided by existing monitoring tools has limited usefulness. The main mechanism to collect data relates to meeting questionnaires which are used at every meeting and give very limited insights. An annual review / discussion with participants at a CSD meeting maybe a better way of collecting insights into the process and engaging with CSOs on how to improve the process / the extent that they are satisfied.

The current situation is one of survey fatigue. There is little benefit and interest in completing the monitoring form. From our evaluation experience, the questions posed in the monitoring questionnaire seem to be appropriate, but the fact that the same questionnaire is used for each meeting and that many participants attend several meetings a year means that the usefulness in filling in the questionnaire has become limited for many participants. The fact that low numbers of meeting participants fill in the form confirms that this approach is not optimal. The information is collected on paper and then fed into a database. The questionnaire is mainly comprised of closed questions and one open question. This format, when used as a stand-alone tool, is not very insightful if there is no other available evidence and the number of respondents is low.
Although perhaps not formally considered to be part of the monitoring process, it is noted that Contact Group members are asked to provide general feedback on meetings. This is a good contribution to the task of gathering feedback on the process as Contact Group members can provide more detail than the questionnaire currently used.

There seem to be significant discrepancies in the data on the volumes and types of participants in CSO meetings between what is presented on the DG Trade website (bookmark "Statistics), the CSD (Annual) Reports of activities and spreadsheets used internally by DG Trade for monitoring purposes. Some of these relate to the continued use of an IT system that has not been brought up to date with current data harvesting and analysis requirements.
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