

To: The European Commission

Concerning: Comments on Green Paper on Services of General Interest

1. Since the responsibilities of the undersigned concern mainly issues of social services, the scope of our comments relate to social services especially.
2. We welcome the green paper because it provides an additional opportunity to conduct discussions on national and EU level on the matter of services of general interest. One main issue is the degree to which services of general interest can contribute to the social quality in the memberstates of the EU.
3. The greenpaper is insufficiently accessible as a text and the questions are not sufficiently focussed. We regret that this opportunity to bring the EU closer to its citizens by a transparant text, a more convenient timeframe for consultation and an active consultation approach has not been seized. We recommend that a further consultation procedure be set up, with an interactive approach. Some of the issues for analysis and debate are indicated below.
4. The distinction between services of economic and non-economic interest does not correspond to the reality of social services. Most social services can be well regulated under the internal market rules and we look forward to the positive effects that progressive implementation of the internal market in the field of social services may have on access, on efficiency and on responsiveness to the needs of patients, clients and consumers. However, a number of social services may have such characteristics that the local, regional and national authorities must be in the position to define additional service delivery conditions and quality criteria. Scale of the market and scale of service provision thereby are important elements to consider. It is a matter of further debate and analysis as to which services this applies. Equally, further debate should clarify if any social services can be considered as non-economic or should be exempt from the market rules.
5. Another matter of further analysis in the memberstates is the supposed added value of non profit service providers of various kinds: the added value and the characteristics of such organisations should be described and the need, if any, for specific protection or other measures clarified.
6. As a contribution to the international debate we intend to undertake an inventory of social services and service providers in the Netherlands for which we suggest that special conditions may need to apply. This inventory will be done in the form of a consultation process among authorities and civil organisations in the Netherlands.

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The European Commssion is authorised to publish this reaction on the website of the EC.

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