Service contract to support the evaluation of the Seventh Environment Action Programme (7th EAP)

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Service contract to support the evaluation of the 7th Environment Action Programme

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Date
Rotterdam, January 2019

In association with:
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<th>Description</th>
</tr>
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<tbody>
<tr>
<td>ACR+</td>
<td>Association of Cities and Regions for sustainable Resource management</td>
</tr>
<tr>
<td>BEUC</td>
<td>Bureau Européen des Unions de Consommateurs</td>
</tr>
<tr>
<td>CAP</td>
<td>Common Agriculture Policy</td>
</tr>
<tr>
<td>COMENVI</td>
<td>European Parliament’s Environmental Committee</td>
</tr>
<tr>
<td>CEFIC</td>
<td>European Chemical Industry Council</td>
</tr>
<tr>
<td>DG</td>
<td>Directorate-General</td>
</tr>
<tr>
<td>EAP</td>
<td>Environment Action Programme</td>
</tr>
<tr>
<td>EC</td>
<td>European Commission</td>
</tr>
<tr>
<td>ECHA</td>
<td>European Chemical Agency</td>
</tr>
<tr>
<td>EDC</td>
<td>Endocrine Disruptor Chemical</td>
</tr>
<tr>
<td>EEA</td>
<td>European Environment Agency</td>
</tr>
<tr>
<td>EIB</td>
<td>European Investment Bank</td>
</tr>
<tr>
<td>EIR</td>
<td>EU Environment Implementation Review</td>
</tr>
<tr>
<td>EP</td>
<td>European Parliament</td>
</tr>
<tr>
<td>ERDF</td>
<td>European Regional Development Fund</td>
</tr>
<tr>
<td>EREF</td>
<td>The European Renewable Energies federation</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>EuRIC</td>
<td>European Recycling Industries Confederation</td>
</tr>
<tr>
<td>GHG</td>
<td>Greenhouse Gas</td>
</tr>
<tr>
<td>GPCP2050</td>
<td>General Principles of Climate Policy 2050</td>
</tr>
<tr>
<td>HEAL</td>
<td>The Health and Environment Alliance</td>
</tr>
<tr>
<td>IMPEL</td>
<td>European Union Network for the Implementation and Enforcement of Environmental Law</td>
</tr>
<tr>
<td>IUCN</td>
<td>International Union for Conservation of Nature</td>
</tr>
<tr>
<td>LIFE</td>
<td>L’Instrument Financier pour l’Environnement</td>
</tr>
<tr>
<td>MFF</td>
<td>Multi-Annual Financial Framework</td>
</tr>
<tr>
<td>MS</td>
<td>Member State</td>
</tr>
<tr>
<td>NEC</td>
<td>National Emission Ceiling</td>
</tr>
<tr>
<td>SDG</td>
<td>Sustainable Development Goals</td>
</tr>
<tr>
<td>SEA</td>
<td>Sustainable Economy Association</td>
</tr>
<tr>
<td>SEP</td>
<td>State Environmental Policy</td>
</tr>
<tr>
<td>SME</td>
<td>Small and Medium-sized Enterprises</td>
</tr>
<tr>
<td>SOER</td>
<td>State Of the Environment Report</td>
</tr>
<tr>
<td>SVHC</td>
<td>The Candidate List of Substances of Very High Concern</td>
</tr>
<tr>
<td>ToR</td>
<td>Terms of Reference</td>
</tr>
<tr>
<td>UN</td>
<td>United Nations</td>
</tr>
<tr>
<td>UNECE</td>
<td>United Nations Economic Commission for Europe (UNECE)</td>
</tr>
<tr>
<td>UNFCCC</td>
<td>United Nations Framework Convention on Climate Change</td>
</tr>
<tr>
<td>WHO</td>
<td>World Health Organisation</td>
</tr>
</tbody>
</table>
Abstract

English
The Seventh Environment Action Programme (7th EAP) is the overarching strategy of the European Union (EU) and its Member States (MSs) for the environment and climate change. It was adopted under codecision for the seven-year time frame spanning from 2014-2020. This report covers assistance provided to the European Commission in the evaluation of the 7th EAP. This report focuses on the stakeholder consultations, including an Open Public Consultation, targeted consultations (with MSs and other stakeholders), and two workshops. The work included five specific issue papers.

The consultations found that the 7th EAP has been beneficial: as the only EU strategy that prioritises environmental issues, it has EU-added value. It is an effective tool for promoting high-level policy coherence, and promoted efficient policy making by helping to reduce contradictions between policies. The 7th EAP provides predictability and accountability for the environmental policy actions of the European Commission and Member States. It is coherent with other strategies including the Juncker priorities and the drive for growth and jobs. Possible areas for improvement include: engaging a wider variety of stakeholders, such as private citizens and businesses; a more focused and concise strategy to enable better communication; and, a clearer inclusion of the Sustainable Development Goals (SDGs).

Français
Le septième programme d'action pour l'environnement (7ème PAE) représente la stratégie générale de l'Union européenne (UE) et de ses États membres visant l’environnement et le changement climatique. Elle a été adoptée selon une procédure de codécision sur une période de sept ans de 2014 à 2020. Le rapport actuel a pour objet de décrire le soutien apportée à la Commission européenne dans le cadre de l’évaluation du 7ème PAE. Il présente les consultations des parties prenantes menées au cours de l’évaluation, ce qui inclut une consultation publique, des consultations auprès des parties prenantes ciblées (les États membres, ainsi que d’autres intervenants) et deux ateliers. Le travail a compris cinq documents de discussion.

Les consultations ont montré que le 7ème PAE a été bénéfique : étant la seule stratégie de l’UE qui privilégie les problèmes environnementales, elle possède de la valeur ajoutée communautaire. Elle a été considérée comme un outil efficace pour promouvoir la cohérence des politiques de haut niveau, ce qui a promu l’efficacité de la prise de décision politique en diminuant la contradiction des politiques. Le 7ème PAE apporte de la prévisibilité et responsabilité pour les actions de la Commission européenne et des États membres en matière de politique environnementale. Parmi les possibles améliorations de la stratégie, les intervenants ont cité le besoin d’engager une plus grande variété de parties prenantes telles que les particuliers et les entreprises. D’autres domaines qui pourraient être améliorés comprennent une stratégie de communication plus forte du 7ème PAE, une prise en compte plus claire des objectifs de développement durable (ODD), ainsi que le financement et l’amélioration des conseils sur les outils de mise en œuvre du programme.

Deutsch
Das Siebte Umweltaktionsprogramm (7. UAP) ist die allumfassende Umwelt- und Klimastrategie der Europäischen Union (EU) und ihrer Mitgliedstaaten (MS). Das Programm wurde mittels eines Mitentscheidungsverfahrens für die siebenjährige Zeitperiode von 2014-2020 festgelegt. Dieser Bericht detailliert die unterstützende Hintergrundarbeit (anhand allgemeiner und gezielter Befragung von
Interessengruppen, einer öffentlichen Konsultation, sowie zweier Workshops), die im Rahmen der Evaluierung des 7. UAP für die Europäische Kommission durchgeführt wurde. Fünf weitere Themenpapiere, die während des Evaluierungsprozesses erarbeitet wurden, sind dem Bericht ebenso beigefügt.

Executive Summary

Context

Problems related to environmental pressures need to be targeted in a structured way, not least because many of them are of a cross-border nature and need a Europe-wide response. Therefore, in the mid-1970s, the EU designed the Environmental Action Programme (EAP). The latest programme, the 7th EAP, was adopted under codecision in November 2013 and is titled ‘Living well, within the limits of our planet’. The programme lasts until the end of 2020. The scope of the 7th EAP is wide, as illustrated by its nine objectives, 36 sub-objectives and 60 actions. The first three key objectives are the core of the programme, while the rest are enablers and horizontal objectives that are intended to support the achievement of the key objectives. These are displayed below.

Figure i - Priority objectives of the 7th EAP

Article 4.2 of the Decision adopting the 7th EAP stipulates that the European Commission (EC) shall carry out an evaluation of the 7th EAP, based inter alia on the European Environment Agency (EEA)’s report on the state of the environment and on a consultation with interested stakeholders. Based on this evaluation, the EC shall submit a report to the European Parliament (EP) and to the Council before the end of the 7th EAP.

Objectives of the study

The overall objective of the study is to provide support for the EC’s evaluation of the progress of the 7th EAP. The objective of the assignment is not to conduct the evaluation itself (this is done by the EC), but to provide support to this process by conducting consultations and preparing issue-specific papers. The EC evaluation process includes some additional stakeholder consultation and took account of the EC’s own consideration and analysis of issues, which is not reported here but can be found in the EC’s published evaluation of the 7th EAP.
Approach

The assistance provided under this assignment included an Open Public Consultation, targeted consultations (Member State [MS] and non-MS), and two Workshops. The number of stakeholders engaged per consultation method is presented below. No total figure has been provided, as many of the stakeholders attended several of the consultation activities. It should be noted that despite extensive efforts to engage a diverse range of stakeholders, several organisations felt that they were unable to comment on the 7th EAP in the detail required. The groups of stakeholders that was hardest to engage were businesses and civil society, many of whom felt that they lacked practical experience and knowledge of the 7th EAP. This is arguably not surprising as the overarching nature of the 7th EAP means that it has much less direct impact on industry and individuals than other, more specific, areas of European policy. The stakeholders that have a deep knowledge of the 7th EAP are typically those engaged in strategic level environmental policy making, either at European or national level. The issues of lack of business and public engagement with the 7th EAP are picked up in the consultation and our analysis, and their relative lack of direct engagement with the consultations provides evidence of this.

Table i - Number of stakeholders consulted, per stakeholder activity

<table>
<thead>
<tr>
<th>Stakeholder consultation activity</th>
<th>Total number of participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Public Consultation (May to July 2018)</td>
<td>153</td>
</tr>
<tr>
<td>Targeted Member State Consultation (July to September 2018)</td>
<td>14</td>
</tr>
<tr>
<td>Targeted Non-Member State Consultation (August to September 2018)</td>
<td>18</td>
</tr>
<tr>
<td>Workshop 1 (21st June 2018)</td>
<td>33</td>
</tr>
<tr>
<td>Workshop 2 (13th November 2018)</td>
<td>58</td>
</tr>
</tbody>
</table>

Open Public Consultation

The Open Public Consultation was made available for all EU citizens in all official EU languages (except Irish) during the period of the 3rd of May 2018 until the 26th of July 2018. It was uploaded to the EU consultations tool and further disseminated via email and on the 7th EAP’s EUROPA website.

In total 153 respondents completed the questionnaire. Most respondents were private individuals (69 in total, or 45% of the 153). 39 respondents (26%) were from NGOs, 17 (11%) were business representatives, and 16 (10%) were from public authorities. There were also responses from two academics, a citizen association and an EU institution.

Figure ii - Open Public Consultation responses
**Targeted Consultation**

We targeted the most relevant stakeholders and allowed them to provide input and feedback on the issues closest to their experience and involvement. The stakeholders split into two main groups: MS representatives and non-MS stakeholders.

Interviews and focus groups were conducted via face-to-face meetings, teleconference, or written response.

MS responses were received from 14 of the 28 EU nations (see Figure iii). This gave a good balance in terms of geography, date of accession to the EU, and size of the country. Table ii (below) shows the nature of the 18 non-MS stakeholders. Six of these, (39%), were NGOs. There was only one private businesses/industrial stakeholder interviewed. This is believed to be because this group of stakeholders are less aware of and/or interested in, the programme.

<table>
<thead>
<tr>
<th>Table ii - Non-MS interviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business</td>
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<td>1</td>
</tr>
</tbody>
</table>

**Workshops**

Two workshops were held: one on the 21st June 2018, and the other on the 13th November 2018. The first workshop was designed to gather information and input while also presenting our work up to that time. The second workshop was used to validate the results of the consultation work.

The number of participants per stakeholder type, per workshop is shown below.

<table>
<thead>
<tr>
<th>Table iii - Workshop participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workshop 1</td>
</tr>
<tr>
<td>3</td>
</tr>
<tr>
<td>Workshop 2</td>
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<td>3</td>
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</tbody>
</table>

**Summary of findings**

The findings of the consultations carried under this study are summarised under the main evaluation headings below.

**Effectiveness**

The opinions collected during the consultations indicate that the 7th EAP is perceived to be an effective high-level strategy for promoting environmental issues at the EU level. The three main issues raised under this heading are presented below.
High-level Strategy
As a high-level strategy, it was felt that the 7th EAP effectively influences broad environmental EU trends. Resource-efficiency was the thematic goal where stakeholders believed this was most apparent, though positive influence was also apparent in the increased focus on natural capital and sustainable cities. Although it was difficult to directly link such a high-level strategy to progress in implementation, MSs such as Bulgaria, Italy, and Poland noted that their national strategies were influenced by the 7th EAP.

Accountability and predictability
Many stakeholders felt that the 7th EAP has been an effective tool for accountability and predictability. It provides a to-do-list for EU policy-makers (the EC), which provides signals to EU citizens and allows NGOs and/or the European Parliament (EP) to hold them to account. Accountability could be further enhanced if the programme included more concrete targets. Delivering stronger ownership of the document amongst EU policy-makers was also noted as a means to increase its effectiveness in this area.

Engage more stakeholders
The programme was perceived as less effective in engaging a diverse variety of EU citizens. Engagement of private citizens and businesses/industry was felt to be lacking. To facilitate their inclusion, it was suggested that they should be more directly targeted by the programme. A stronger communication strategy throughout the EAP’s lifespan was also suggested as a way to help increase its ability to engage.

Efficiency
This evaluation criteria typically focuses on costs and benefits. As a high-level strategy it is difficult to concretely quantify the benefits of the 7th EAP. Therefore, the evaluation focussed on the 7th EAPs influence on efficient policy making. The main conclusion here was that the programme saved costs, via policy-mainstreaming and improving the knowledge base; however, it could do more with regard to promoting / enabling efficient implementation.

Saved costs
Promoting the mainstreaming of environmental policy and improving our knowledge base were viewed as successes for the 7th EAP. The latter was considered a cost-saving mechanism, as knowledge can help identify the most innovative and efficient means to solve environmental challenges. It was suggested that this aspect of the EAP could be enhanced through a greater focus on common information sharing approaches. It was difficult to quantify the impact of the 7th EAP on environmental mainstreaming, however an increased focus on policy synergy was noted by stakeholders.

More implementation required
Some regarded the 7th EAP’s focus on implementation as insufficient. They noted that the EU environmental acquis continues to grow, but the efforts to implement it are lacking. They believed the 7th EAP should increase its focus on EU financial tools that are often key to implementation.
Coherence

The programme’s objectives were all perceived as internally coherent. Stakeholders felt that the issue of broader coherence should not be left for one priority objective, but should be more explicitly outlined in each objective. Three levels of coherence were discussed, as follows:

EU-level
Some EU policy was perceived to lack coherence with the 7th EAP. Examples included the Common Agricultural Policy (discussed during the workshops, see Annex H), Water Framework Directive and Renewable Energy Directive (some stakeholders felt that the two directives aren’t coherent with each other, which therefore contradicts the 7th EAP’s overarching objective of EU policy coherence, see Section 5.5.2), and EU funding tools. Furthermore, some stakeholders perceived that certain EU strategies (such as the Juncker Priorities and Europe2020) overshadow the 7th EAP, rather than complementing or utilising it. This can diminish the EAP’s effectiveness, which was viewed as strategy incoherence.

Member State level
Several MSs outlined synergies between the 7th EAP and national policy. Examples were provided by the Czech Republic, Estonia, Italy, and the UK, such as the coherent focus on sustainable cities. Nevertheless, broad difficulties with the coherent implementation of environmental policy at a national level were still perceived. Therefore, MSs still considered it necessary to have a continued push to ensure coherence at the EU level.

International level
The 7th EAP was regarded as coherent with the Sustainable Development Goals (SDGs) and the Paris agreement. It was suggested that the SDGs should be more succinctly incorporated in the 7th EAP. A focus on environmental cooperation with neighbouring and third countries was also deemed necessary.

Relevance

Overall, the objectives and approach of the 7th EAP was considered as still being relevant for tackling current environmental challenges. Some perceived the broad scope of the programme as facilitating its longevity. Some suggestions for improvement were made. These included an increased focus on funding instruments, incorporating a stronger systemic narrative into the programme, identifying better systems of implementation, and improved communication. Some stakeholders also suggested a greater focus on emerging issues (such as chemicals and plastics), although others considered that the programme already captures these issues sufficiently.

EU-added value

Almost all stakeholders agreed that the 7th EAP provides added value both for the EU and the MSs, which is relevant given their joint responsibility. It was described as the only EU strategy that prioritises the environment. It was also perceived to increase EU ambition, particularly via the long-term vision. MSs outlined how the programme adds value in setting their environmental ministries’ priorities. The main two areas where the 7th EAP provides EU-added value, were as a tool for communication, and in providing some EU coherence.
Tool for dialogue and communication
The programme was considered as an effective tool for communication, with some noting how they use the 7th EAP for engagement of stakeholders and for the common language it offers. MSs outlined how it generated further inter-MS dialogues. This was perceived as added-value only possible at an EU level. It was suggested that an improved communication strategy, to ensure broader stakeholder engagement (particularly for businesses and private citizens) could increase this value.

Coherence at EU level
Stakeholders regarded the coherence generated by the 7th EAP as added value that would be absent without such a pan-EU strategy. Such coordinated policy responses were regarded as ever more necessary at an international level. The 7th EAP can be viewed as a tool to express the agreed priorities across the EU.

A future EAP
Although beyond the scope of the study, several stakeholders reported their support for an 8th EAP. Several suggestions were offered on how the 7th EAP could be improved. These cut across the various evaluation criteria. The suggestions included, the explicit inclusion of the SDGs, a better engagement of stakeholders (via a strong communication strategy), and that at least part of the document should be made more concise (particularly by providing better prioritised actions and objectives, as well as concrete targets).
Synthèse du rapport

Le contexte

Les problèmes liés aux pressions sur l'environnement doivent être ciblés de manière structurée, notamment parce que beaucoup d'entre eux aient un caractère transfrontalier et nécessitent une réponse à l'échelle européenne. Ainsi, au milieu des années 1970, l’UE créa le programme d’action pour l’environnement (PAE). Le programme le plus récent, celui du 7ème PAE, a été adopté par une procédure de codécision en novembre 2013 portant le titre « Bien vivre, dans les limites de notre planète ». Le programme dure jusqu’à la fin de 2020. La portée du 7ème PAE est large, ce qui se remarque par les neuf objectifs, 36 sous-objectifs et 60 actions. Les premiers trois objectifs clés composent le noyau du programme, alors que les autres objectifs permettent la réalisation des objectifs clés. Les objectifs sont illustrés ci-dessous.

Figure i - Les objectifs prioritaires du 7ème PAE

L'article 4.2 de la décision portant l’adoption du 7ème PAE dispose que la Commission européenne procède à une évaluation du programme, sur la base du rapport sur l’état de l’environnement de l’Agence européenne pour l’environnement (AEE) et d’une consultation des parties prenantes intéressées, entre autres. Sur la base de cette évaluation, la Commission présentera un rapport au Parlement européen et au Conseil avant la fin du 7ème PAE.

Les objectifs de l’étude

L’étude a pour objet d’assister la Commission européenne à évaluer le progrès du 7ème PAE. L’objectif de la mission n’est pas de mener l’évaluation en soi (la Commission étant responsable de l’évaluation), mais de soutenir le processus d’évaluation. Cela se fait en menant des consultations et en préparant...
des documents de discussion sur des thèmes spécifiques. Le processus d’évaluation comprend une consultation supplémentaire des parties prenantes et a pris en compte la réflexion et l’analyse de la Commission. Celles-ci ne sont pas signalées dans ce rapport mais se trouvent dans l’évaluation du 7ème PAE publiée par la Commission.

La démarche

La mission faisant l’objet de cette étude est basée sur une consultation publique, une consultation auprès de parties prenantes ciblées (États membres et d’autres groupes d’intervenants), ainsi que deux ateliers. Le nombre d’intervenants ayant participé dans chaque type de consultation se trouve ci-dessous. Le chiffre total de participants n’a pas été figuré car beaucoup d’intervenants ont assisté à plusieurs consultations. Il faut noter que malgré le fait d’avoir essayé d’attirer des parties prenantes diverses, certaines organisations ne se sont pas senties capables de fournir leur avis sur le 7ème PAE avec le niveau de détail requis. Les groupes d’intervenants qui ont été les plus difficiles à engager ont été les entreprises et la société civile, la plupart d’entre eux ayant le sentiment de manquer de connaissances et d’expérience avec le 7ème PAE. Cette découverte n’est pas surprenante car le cadre général du 7ème PAE signifie moins d’impact direct sur l’industrie et sur les individus que sur d’autres domaines politiques plus spécifiques. Les parties prenantes qui ont des connaissances approfondies sur le 7ème PAE sont généralement celles qui s’impliquent au niveau stratégique dans l’élaboration des politiques environnementales - soit au niveau européen, soit au niveau national. Cette question de manque d’engagement de la part des entreprises et du publique a été prise en compte dans la consultation et dans notre analyse et a été prouvée par le manque d’engagement direct (et relatif) de ces intervenants dans les consultations.

Tableau i - Nombre de participants, selon chaque type d’activité de consultation

<table>
<thead>
<tr>
<th>Activité de consultation</th>
<th>Nombre total de participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation publique (de mai au juillet 2018)</td>
<td>153</td>
</tr>
<tr>
<td>Consultation visant les États membres (de juillet au septembre 2018)</td>
<td>14</td>
</tr>
<tr>
<td>Consultation auprès d’autres intervenants ciblés (de août au septembre 2018)</td>
<td>18</td>
</tr>
<tr>
<td>Premier atelier (le 21 juin 2018)</td>
<td>33</td>
</tr>
<tr>
<td>Duexième atelier (le 13 novembre 2018)</td>
<td>58</td>
</tr>
</tbody>
</table>

Consultation publique

La consultation publique a été mise à la disposition de tous les citoyens de l’UE dans toutes les langues officielles de l’UE (à part l’irlandais) sur la période du 3 mai 2018 jusqu’au 26 juillet 2018. Elle a été téléchargée sur l’outil de consultation de l’UE, diffusée par courrier électronique et mise sur le site EUROPA du 7ème PAE.

En tout, 153 personnes ont répondu au questionnaire. La plupart des répondants étaient des particuliers (soit 69 personnes ou 45% du total). 39 répondants (26%) provenaient des ONG, 17 (11%) étaient des représentants des entreprises et 16 (10%) provenaient des autorités publiques. Il y a eu encore 2 participants académiques, une association de citoyens and une institution de l’UE.
Consultation auprès des intervenants ciblés

Nous avons ciblé les parties prenantes les plus importantes et nous leur avons permis de fournir leurs opinions sur les problèmes les plus proches de leurs expériences et de leur engagement.

Des entretiens et des groupes de discussions ont été menés via des rencontres en personne, des téléconférences ou des réponses écrites.

14 des 18 États membres de l’UE ont répondu à cette consultation (voir figure iii). Cet échantillon a offert une répartition équilibrée du point de vue géographique, de la date d’adhésion à l’UE et de la dimension du pays. Le tableau ii (ci-dessous) montre les autres 18 intervenants ayant participé à la consultation. Parmi ces 18 intervenants, 6 (39%) étaient des ONG. Il n’y a eu qu’une entreprise/représentant industriel qui a été interviewé. Cela peut être expliqué par le fait que ce groupe d’intervenants soit moins conscient et/ou intéressé par le PAE.

Tableau ii - Entretiens avec les parties prenantes autres que les États membres

<table>
<thead>
<tr>
<th>Entreprise</th>
<th>UE / organisation institutionnelle</th>
<th>ONG</th>
<th>Autorité régionale</th>
<th>Association industrielle</th>
<th>Banque</th>
<th>Association de durabilité</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>4</td>
<td>6</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>17</td>
</tr>
</tbody>
</table>
Les ateliers
Deux ateliers ont été organisés au cours de ce contrat : le premier a eu lieu le 21 juin 2018 et le deuxième a eu lieu le 13 novembre 2018. Le premier atelier visait à recueillir des informations et contributions tout en présentant le travail fait jusqu’à cette date. Le deuxième atelier a été utilisé pour valider les résultats de la consultation.

Le nombre de participants dans chaque atelier et selon le groupe d’intervenant se trouve en bas.

Tableau iii - Les participants des ateliers

<table>
<thead>
<tr>
<th></th>
<th>Association Industrielle</th>
<th>État membre</th>
<th>Institution internationale ou de l’UE</th>
<th>ONG / Groupe de réflexion / Recherche</th>
<th>L’équipe de projet</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atelier 1</td>
<td>3</td>
<td>7</td>
<td>11</td>
<td>6</td>
<td>5</td>
<td>32</td>
</tr>
<tr>
<td>Atelier 2</td>
<td>3</td>
<td>22</td>
<td>16</td>
<td>10</td>
<td>7</td>
<td>58</td>
</tr>
</tbody>
</table>

Synthèse des résultats
Les conclusions des consultations menées dans le cadre de cette étude sont résumées selon les principales rubriques de l’évaluation ci-dessous.

Efficacité
Les opinions exprimées au cours des consultations indiquent une perception du 7ème PAE comme étant une stratégie de haut niveau efficace pour promouvoir les problèmes environnementales à l’échelle de l’UE. Les trois questions principales évoquées dans le cadre de cette rubrique sont présentées ci-dessous.

Une stratégie de haut niveau
En tant que stratégie de haut niveau, le 7ème PAE influence de façon efficace les grandes tendances environnementales de l’UE. Les parties prenantes ont pensé que cette influence s’est surtout ressentie au niveau de l’objectif thématique de l’utilisation rationnelle des ressources, bien que l’influence positive soit également visible dans l’accent mis sur le capital naturel et les villes durables. Alors qu’il a été difficile de mesurer le progrès de la mise en œuvre du programme, les États membres tels que la Bulgarie, l’Italie et la Pologne ont souligné l’influence du 7ème PAE sur leurs stratégies nationales.

Responsabilité et prévisibilité
De nombreux intervenants ont estimé que le 7ème PAE fut un outil efficace pour promouvoir la responsabilité et la prévisibilité. Le programme fournit une liste de tâches à faire aux décideurs politiques de l’UE (de la Commission européenne), ce qui fournit des signaux aux citoyens de l’UE et permet aux ONG et/ou au Parlement européen de leur demander des comptes. La responsabilité pourrait être améliorée davantage si le programme contenait des cibles plus concrètes. Une autre façon d’améliorer l’efficacité du PAE dans ce domaine serait le renforcement de l’appropriation du document du PAE au sein des décideurs politiques de l’UE.

Engager plus de parties prenantes
Le programme a été perçu comme étant moins efficace dans l’engagement d’une grande variété de citoyens UE. L’engagement des particuliers et des entreprises/de l’industrie manquait. Pour faciliter
l’inclusion de ces intervenants, il a été suggéré que le programme devrait cibler ces derniers de façon plus directe. Une stratégie de communication plus puissante au cours du cycle de vie du PAE a aussi été suggérée comme moyen d’augmenter la capacité d’engagement des intervenants.

Efficience

Ce critère d’évaluation se concentre d’habitude sur les coûts et les bénéfices. En tant que stratégie de haut niveau, il est difficile de mesurer les bénéfices du 7ième PAE. Alors, l’évaluation s’est axée sur l’influence du 7ième PAE sur l’efficacité de l’élaboration des politiques. Dans ce contexte, le programme a pu faire des économies par le biais de l’intégration des politiques et le renforcement de la base de connaissance. Cependant, le programme peut promouvoir davantage une mise en œuvre plus efficiente.

Coûts réduits

La promotion de l’intégration des politiques environnementales et le renforcement de la base de connaissance existante ont été perçus comme des réussites du 7ième PAE. L’accumulation de connaissances a été considérée comme un moyen de réduire les coûts car la connaissance peut aider à identifier les méthodes les plus innovatrices et efficientes de résoudre les problèmes environnementales. Il a été suggéré que cet aspect du PAE peut être renforcé en mettant davantage l’accent sur les approches communes de partage d’information. Il a été difficile de mesurer l’impact du 7ième PAE sur l’intégration des questions environnementales dans l’élaboration des politiques, mais les intervenants ont souligné un accent accru sur la complémentarité des politiques.

Besoin de plus de mise en œuvre

Certains ont perçu le niveau de mise en œuvre du 7ième PAE insuffisant. Il a été noté que l’acquis environnemental de l’UE continue à se développer, mais que les efforts pour le mettre en œuvre manquaient. Ils ont estimé que le 7ième PAE devrait accroître son accent sur les outils européens de financement qui servent d’habitude un rôle important de mise en œuvre.

Cohérence

Les objectifs du programme ont tous été perçus comme étant cohérents sur le plan interne. Les parties prenantes ont toutefois noté que la question de cohérence ne devrait pas se trouver que dans un seul objectif prioritaire, mais devrait être soulignée de façon plus explicite au sein de chaque objectif. Ainsi, trois niveaux de cohérence ont été mentionnés :

Au niveau de l’UE

Certaines politiques européennes ont été perçues comme n’étant pas cohérentes avec le 7ième PAE. Par exemple, la politique agricole commune (abordée dans le cadre des ateliers - voir l’annexe H), la directive-cadre sur l’eau et la directive sur les énergies renouvelables (certaines parties prenantes ont senti que les deux directives ne sont pas cohérentes entre elles, ce qui conteste l’objectif général du 7ième PAE sur la cohérence de la politique de l’UE - voir la section 5.5.2), ainsi que les outils de financement de l’Union. Par ailleurs, certaines parties prenantes ont considéré que certaines stratégies de l’UE (telles que les priorités de Juncker et l’Europe2020) éclipotent le 7ième PAE au lieu de le compléter. Cela peut diminuer l’efficacité du PAE, ce qui a été vu comme une incohérence stratégique.

Au niveau des États membres
Plusieurs États membres ont aperçu des synergies entre le 7ème PAE et leurs politiques nationales. Des exemples ont été évoqués par la République tchèque, l’Estonie, l’Italie et le Royaume Uni, notamment l’accent mis sur les villes durables. Néanmoins, de larges difficultés avec la mise en œuvre cohérente de la politique environnementale au niveau national ont été encore perçues. Par conséquent, les États membres ont toujours jugé nécessaire de continuer à faire pression pour assurer la cohérence au niveau de l’UE.

Au niveau international
Le 7ème PAE a été considéré comme étant cohérent avec les objectifs de développement durables (ODD) et l’Accord de Paris. Il a été suggéré que les ODD devraient être englobés de façon plus concise dans le 7ème PAE. Une attention plus importante devrait aussi être mise sur la coopération environnementale avec les pays voisins et les pays tiers.

Pertinence
Dans l’ensemble, les objectifs et l’approche du 7ème PAE ont été jugés pertinents pour relever les défis environnementaux actuels. Certains ont perçu la vaste portée du programme comme facilitant sa longévité. Quelques suggestions d’amélioration ont été faites. Parmi les suggestions se trouvent : une focalisation plus importante sur les instruments de financement, l’enracinement d’une narration systémique plus forte dans le programme, l’identification de meilleurs systèmes de mise en œuvre et une meilleure communication. Certaines parties prenantes ont également suggéré de mettre davantage l’accent sur les problèmes émergents (tels que les produits chimiques et les plastiques), bien que d’autres aient estimé que le programme prenait ces problèmes déjà suffisamment en compte.

Valeur ajoutée communautaire
Presque tous les intervenants se sont mis d’accord sur le fait que le PAE soit un document qui apporte de la valeur ajoutée à l’UE et aux États membres. Cela est important parce que l’UE et les États membres portent une responsabilité commune. Le programme a été décrit comme étant la seule stratégie de l’UE qui donne de la priorité à l’environnement. Le programme a aussi été perçu comme un élément ayant poussé l’ambition de l’UE, en particulier à travers sa vision à long-terme. Les États membres ont souligné que le PAE ait influencé de façon positive les priorités de leurs ministères d’environnement. Les domaines les plus importants où le 7ème PAE ait démontré une valeur ajoutée communautaire étaient en tant qu’outil de communication et en tant que source de cohérence au niveau de l’UE.

Un outil de dialogue et de communication
Le programme a été considéré comme un outil efficace de communication. Certains participants ont noté que le 7ème PAE leur offre un moyen d’engager les partie prenantes, ainsi qu’un langage commun. Les États membres ont souligné que le 7ème PAE ait généré du dialogue supplémentaire entre les États. Cela a été perçu comme ayant une valeur ajoutée seulement au niveau de l’UE. Il a été suggéré qu’une stratégie améliorée de communication pourrait augmenter cette valeur ajoutée, notamment en assurant un engagement plus important de parties prenantes plus diverses (en particulier les entreprises et les particuliers).

Cohérence au niveau de l’UE
Les parties prenantes ont estimé que la cohérence générée par le 7ième PAE constitue une valeur ajoutée qui serait absente sans une telle stratégie pan-UE. De telles réponses politiques coordonnées ont été davantage considérées comme nécessaires sur le plan international. Le 7ième PAE peut être regardé comme un outil qui exprime les priorités consenti dans toute l’UE.

**Un futur PAE**

Même si la question d’un futur PAE dépasse l’étendue du travail, plusieurs intervenants ont indiqué leur soutien pour un 8ième PAE. Plusieurs conseils ont été proposés pour améliorer le 7ième PAE. Ces conseils traversent les différents critères d’évaluation. Ils comprennent la prise en compte explicite des ODD et un meilleur engagement des parties prenantes (à travers une meilleure stratégie de communication). Il a aussi été noté qu’au moins une partie du PAE devrait être plus concis (notamment en fournissant des meilleures actions et objectifs prioritaires, ainsi que des cibles plus concrètes).
Zusammenfassung des Berichts

Kontext


Figur i - Prioritäre Ziele des 7. UAPs


Ziele dieser Untersuchung
Das Hauptziel dieser Studie ist die EK bei der Fortschrittevaluierung des 7. UAPs zu unterstützen. Damit ist es nicht das Ziel die Evaluierung selbst durchzuführen (dies ist Aufgabe der EK), sondern ihr durch das Ausführen von Befragungen und das Erarbeiten von Themenpapieren dabei zu helfen. Der hauseigene Evaluierungsprozess der EK enthält weitere Befragungen und Analysen, die in dem vorliegenden Bericht jedoch nicht behandelt werden.

**Vorgehensweise**


Tabelle iv - Anzahl der befragten Interessenvertreter per Konsultationsaktivität

<table>
<thead>
<tr>
<th>Konsultationsaktivität</th>
<th>Gesamtanzahl der Teilnehmer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Öffentliche Konsultation (Mai bis Juli 2018)</td>
<td>153</td>
</tr>
<tr>
<td>Gezielte Konsultation der Mitgliedsstaaten (Juli bis September 2018)</td>
<td>14</td>
</tr>
<tr>
<td>Gezielte Konsultation nichtstaatlicher Interessenvertreter (August bis September 2018)</td>
<td>18</td>
</tr>
<tr>
<td>Workshop 1 (21. Juni 2018)</td>
<td>33</td>
</tr>
<tr>
<td>Workshop 2 (13. November 2018)</td>
<td>58</td>
</tr>
</tbody>
</table>

**Öffentliche Konsultation**


Gezielte Befragung

Die gezielte Befragung richtete sich auf die wichtigsten Interessenvertreter, die dadurch ihre Probleme, Erfahrungen und Beteiligung am 7. UAP besser erläutern konnten. Zwei verschiedene Gruppierungen von Interessenvertretern wurden geschaffen: Repräsentanten der Mitgliedsstaaten und nichtstaatliche Interessenvertreter.

Interviews und Fokusgruppen wurden entweder persönlich, telefonisch oder schriftlich ausgeführt.

Staatliche Rückantwort wurde von 14 der 28 EU Nationen eingesammelt (siehe Figur iii). Somit wurde eine gute Balance bezüglich der verschiedenen Geographien, EU-Beitrittsdaten und Größe der Mitgliedsstaaten geschaffen. Tabelle ii (unten) zeigt die Charakteristiken der nichtstaatlichen Interessenvertreter auf. Hierbei waren sechs (39%) Befragungen mit NGOs und nur eine mit einem Industrievertreter. Der Grund hierfür beläuft sich wahrscheinlich auf mangelndes Interesse und/oder Kenntnis des 7. UAPs in jener Interessengruppe.

Tabelle v - Befragung nichtstaatlicher Interessenvertreter

<table>
<thead>
<tr>
<th>Unternehmen</th>
<th>EU/Internationale Organisation</th>
<th>NGO</th>
<th>Regionale Autorität</th>
<th>Industrievereinigung</th>
<th>Bank</th>
<th>Nachhaltigkeitsvereinigung</th>
<th>Gesamt</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4</td>
<td>6</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td>17</td>
</tr>
</tbody>
</table>

Workshops

Die Anzahl der Workshop-Teilnehmer per Interessenvertretertyp kann in Tabelle iii eingesehen werden.

Tabelle vi - Teilnehmer der Workshops

<table>
<thead>
<tr>
<th></th>
<th>Industrie-vereinigung</th>
<th>Mitgliedsstaat</th>
<th>EU/Internationale Organisation</th>
<th>NGO/Forschung</th>
<th>Team</th>
<th>Gesamt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workshop 1</td>
<td>3</td>
<td>7</td>
<td>11</td>
<td>6</td>
<td>5</td>
<td>32</td>
</tr>
<tr>
<td>Workshop 2</td>
<td>3</td>
<td>22</td>
<td>16</td>
<td>10</td>
<td>7</td>
<td>58</td>
</tr>
</tbody>
</table>

Zusammenfassung der Befunde

Die Befunde der Konsultation sind nun unter den zentralen Evaluierungsindikatoren der EU zusammengefasst (Effektivität, Effizienz, Kohärenz, Relevanz, EU Mehrwert).

Effektivität

Die eingesammelten Meinungen während des Konsultationsprozesses zeigen auf, dass das 7. UAP als effektive Strategie zur Förderung von umweltspezifischen Angelegenheiten auf EU-Ebene empfunden wird.

Hochrangige Strategie


Verantwortung und Vorhersehbarkeit

Viele der Befragten nannten das 7. UAP ein effektives Werkzeug für Verantwortung und Vorhersehbarkeit. Das Programm liefert eine Erledigungsliste für EU Entscheidungsschläger (die EK), was wiederum Signale an EU Bürger sendet. Zusammen mit NGOs und/oder dem Europäischen Parlament kann somit wiederum Verantwortungsdruck für die EK aufgebaut werden. Das Verantwortungssystem könnte noch verbessert werden, falls konkretere Ziele gesetzt werden würden. Das Dokument sollte auch öfter als Grundlage für EU-Gesetzesvorschläge von relevanten Entscheidungsträgern genutzt werden.

Mehr Interessenvertreter einbinden

Effizienz


Gesparte Kosten


Mehr Implementierung notwendig

Viele der Befragten befanden den Fokus des 7. UAPs auf Implementierung als unzureichend. Obwohl vermerkt wurde, dass der EU Umweltacquis weiterhin wächst, wurden Implementierungsbemühungen als noch zu schwach eingestuft. Das 7. UAP sollte vermehrt von den vielfältigen Finanzmitteln der EU Gebrauch machen, die oftmals wichtige Katalysatoren für Implementierungsvorhaben sind.

Kohärenz

Alle Ziele des 7. UAPs wurden als kohärent eingestuft. Trotzdem wurde von den Befragten hervorgehoben, dass breitere Kohärenz bei allen prioritären Zielen eine Rolle spielen sollte.

EU-Ebene


Mitgliedsstaat-Ebene

Internationale Ebene

Das 7. UAP wurde als kohärent mit den Sustainable Development Goals (SDGs) und dem Pariser Abkommen eingestuft. Es wurde vorgeschlagen die SDGs noch besser in das 7. UAP einzuarbeiten. Außerdem wurde ein verstärkter Fokus auf internationale Umweltkooperation als wichtig empfunden.

Relevanz


EU Mehrwert


Werkzeug für Dialog und Kommunikation


Kohärenz auf EU-Ebene

Der Mehrwert der Kohärenz, die das 7. UAP erzeugt, würde komplett verloren gehen im Falle einer Beendigung des Programms. Koordinierte Politikgestaltung, sowie sie das 7. UAP repräsentiert, ist auf internationaler Ebene ein immer wichtigeres Element. Das 7. UAP zeigt die vereinbarten, ganzeuropäischen Prioritäten auf.

Die Zukunft des UAPs

Obwohl es kein Teil dieser Studie war, offenbarten einige Interessenvertreter ihre starke Unterstützung für ein 8. UAP. Verschiedenste Verbesserungsvorschläge wurden gemacht, die für das 7. UAP und seine mögliche Fortsetzung von Belang sein könnten. Konkrete Vorschläge waren, unter anderem: (i) eine explizite Einbindung der Sustainable Development Goals (SDGs); (ii) eine bessere Einbindung von Interessenvertretern anhand einer starken Kommunikationsstrategie; und (iii) Konkretisierung der prioritären Ziele und Aktionen.
1 Introduction

This is the final report for the project ‘service contract to support the evaluation of the 7th Environment Action Programme’. Our role has been to support the European Commission (EC) in the 7th Environmental Action Programme (EAP) evaluation process through running and summarising the results of the consultations (both open and targeted), alongside the preparation of issue specific papers (on themes requested by the client). As requested by the Terms of Reference (ToR) for this project, this final report provides:

- A short introduction with a description of the study: its purpose, context, objectives, the contractor’s team, and the work carried out;
- A presentation of the methodological approach of the service contract;
- A summary of the consultation results: for the Open Public Consultation, Member State (MS) consultation, and non-MS consultation;
- A summary of the conclusions – although the EC Staff Working Document contains the formal conclusions of the evaluation as a whole, as it draws from more sources than are reported here;
- The issue specific papers (see Annex C).

1.1 Context

The European Union (EU) has faced numerous environmental pressures over the last decades. Results have already been achieved in addressing at least partially, some of these problems such as air, water and soil pollution, yet several challenges persist: climate change, acidification, forest degradation, waste management, freshwater resource management and urban environmental stress, amongst others. These challenges are threatening EU citizens as they can cause negative impacts on their overall quality of life (e.g. health and living conditions) and the EU economy.

Problems related to environmental pressures need to be targeted in a structured way, not least because many of them are of a cross-border nature and need a Europe-wide response. Therefore, the EU designed an overarching environmental policy framework in the mid-1970s: the EAP. To guarantee continued environmental benefits for EU citizens and to meet long-term environmental targets, the EAP has been evaluated and modernised regularly. In November 2013, the 7th EAP was adopted via codecision. The document is titled a General Union Environment Action Programme to 2020, ‘Living well, within the limits of our planet’.

The scope of the 7th EAP is wide and it covers several areas, as illustrated by its nine objectives and 36 sub-objectives and 60 actions. The first three key objectives are the core of the programme, while the rest are enablers and horizontal objectives intended to support the achievement of the key objectives. These are displayed below.
The EC is required to carry out an evaluation of the programme. Article 4.2 of the Decision adopting the 7th EAP stipulates that the EC shall carry out an evaluation of the 7th EAP, based inter alia on the European Environment Agency (EEA)’s report on the state of the environment and on a consultation with interested stakeholders. Based on this evaluation, the EC shall submit a report to the European Parliament (EP) and to the Council in due course before the end of the 7th EAP.

The programme is now in its sixth year. There have been a number of studies/reviews to date which consider the programme’s progress. These included the EC’s Environmental implementation Review (EIR) (Feb. 2017), the EEA’s Annual Indicator report on the 7th EAP (Nov. 2018), the EEA’s wider State of the Environment report (SOER), and the EP’s implementation assessment of the 7th EAP (Nov. 2017). In broad terms these studies and reviews note that current environment and climate policy has been beneficial to nature, citizens and the economy. However, they also conclude that progress against the 7th EAP’s enabling objectives (legislative implementation, improved knowledge, better funding/investment, and more policy coherence) is lagging behind, which subsequently undermines the horizontal objectives (sustainable cities and addressing international challenges).

1.2 The objectives and scope of the project

1.2.1 The objectives of the study

The overall objective of the study is to provide support for the EC’s evaluation of the 7th EAP. We have provided assistance in delivering consultations and have also provided standalone subject-matter analysis and expertise where requested. The objective of the assignment was not to conduct the
evaluation itself (this is led by the EC), but to provide support to this process by conducting consultations and preparing issue-specific papers.

Our work includes the production of detailed summaries of stakeholder consultations, workshop papers and issue-specific papers. These outputs have contributed to the final evaluation report, prepared by the EC.

1.2.2 The scope of this study

The scope of the work is defined by the activities during the period December 2013 to December 2018, considering earlier policies and activities where relevant. In particular, the evaluation focuses on the structure of the programme and the strategic role that it has played, as per the Evaluation Roadmap. The focus has been on the following main characteristics of the 7th EAP:

- Its multi-layered approach with a long-term vision to 2050 combined with 2020 objectives, sub-objectives and actions to achieve these;
- Its dual focus i.e. key objectives complemented by an enabling framework and horizontal priorities; and
- The joint responsibility of MSs and relevant Union institutions to deliver the goals.

1.3 Presentation of the contractor’s team and the work done

The consortium carrying out the support to the evaluation consisted of Trinomics (lead), Technopolis Group, and Öko-Institut. The tasks were broadly split into two, the consultations and the issue papers. The former included the stakeholder consultation support (Task 2) and workshop organisation (Task 3), the latter involved the preparation of issue specific papers (Task 4). The work has also involved delivering a work plan for the study (Task 1) and the delivery of this final report (Task 5).

1.4 Structure of the report

This report is structured as follows:

- **Chapter 2 - Methodological approach**: Summarising the approach we followed;
- **Chapter 3 - Open Public Consultation Analysis**: summarising the responses received; grouped against the main evaluation questions (the full report is annexed);
- **Chapter 4 - Targeted Consultation Member State Analysis**: Summarising the key points from our consultations to date with MS representatives (the full notes are annexed);
- **Chapter 5 - Targeted Consultation Non-Member State Analysis**: Summarising the key points from our consultations with non-MS representatives (the full notes are annexed);
- **Chapter 6 - Conclusions**: Summarising the overall consultation results;
- **Annex A - Questionnaire Open Public Consultation**: The questions from the open survey;
- **Annex B - MS interview topic guide and other stakeholder topic guide**: The questions asked in the MS and non-MS interviews / consultations;
- **Annex C - Issue-Specific Papers**: The full reports in attached document;
- **Annex D - Evaluation Matrix**: The questions included in the ToR (and evaluation roadmap) that the evaluation as a whole seeks to answer;
- **Annex E - MS interview Minutes**: The full notes from the MS consultations are included in the attached document to provide further details). Also grouped by question, to help detailed review;
- **Annex F - Non-MS Interview Minutes**: In attached document;
- **Annex G - Open Public Consultation Synopsis Report**: Included in the attached Document;
- **Annex H - Workshop Reports**: The summary of both workshops (Attached Documents);
- **Annex I - Consultation Synopsis Report**: Overall summary of the results (Attached Documents).
2 Methodological approach

This chapter presents the overall approach taken for the five specific tasks in the study.

2.1 Overall approach

The ToR implied that we should not include certain methodological steps that are part of the required evaluation process - for example, consideration of the intervention logic and an evaluation framework. This is because the evaluation is largely undertaken by the EC, and this study only considers some aspects of the evaluation work.

There are several areas of overlap and interlinkages throughout this study. Figure 2-1 illustrates these, with a focus on outputs and deliverables. We started with Task 1 to agree on the approach to take during the study, after which work on all three following tasks was started more or less simultaneously. Task 5 is the culmination of all consultation activities in the previous tasks in the form of this report and additionally a final PowerPoint presentation.

Figure 2-1 Work flow and interlinkages

2.2 Task 2 - Stakeholder consultations

Table 2-1 Summary of Task 2

<table>
<thead>
<tr>
<th>Objective</th>
<th>Support to the EC on the stakeholder consultations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sub-tasks</td>
<td>2.1 Open Public consultation;</td>
</tr>
<tr>
<td></td>
<td>2.2 Targeted stakeholder consultation.</td>
</tr>
<tr>
<td>Deliverables</td>
<td>Targeted stakeholder consultation questionnaire;</td>
</tr>
<tr>
<td></td>
<td>Targeted stakeholder consultation report;</td>
</tr>
<tr>
<td></td>
<td>Summary of Open Public Consultation;</td>
</tr>
<tr>
<td></td>
<td>Synopsis of the consultation overall (in the final report).</td>
</tr>
</tbody>
</table>
2.2.1 Objective

The objective of this task was to support the EC with the public and targeted consultation. This task had two main stages: an Open Public Consultation and a targeted stakeholder consultation.

2.2.2 Updated summary of the planned activities and methodology

Sub-task 2.1 - Public consultation

The main objective of this sub-task was to consult with a broad number of stakeholders to gain as many views and opinions as possible about the 7th EAP. The online Open Public Consultation was open for 12 weeks, from the 3rd of May 2018 until the 26th of July 2018, and was widely publicised. Overall, it received 153 responses, from a variety of stakeholder types and MSs.

We have completed an analysis of the results, which is included in Annex G. Our analysis and summary of the responses obtained has as much as possible made use of graphs and tables, as well as a user-friendly Excel-sheet of the findings. Chapter 3 of this report contains a brief summary of the results. A factual summary of the report is published on the EC's website.1

Sub-task 2.2 - Targeted stakeholder consultation

To optimise the collection of feedback, we targeted the most relevant stakeholders and allowed them to provide input and feedback on the issues closest to their experience and involvement. The stakeholders contacted were split into two main groups: MS representatives and non-MS stakeholders.

The targeted consultation focused on contacting authorities from MSs, regions and cities, Environmental Protection Agencies, as well as on European organisations that closely follow environmental policy developments, such as international/European environmental NGOs and selected business/industry associations. Consultation methods included interviews and focus groups.

The approach to the targeted stakeholder consultation consisted of the four steps presented below:

1) Identification of key stakeholders (months two to three), including MSs, regional and local authorities, national Environmental Protection Agencies, and where relevant Environmental NGOs and EU business/industry associations;

2) Development of the interviews and focus group guides (months two to three) (interviews or focus groups);

3) Implementation of the consultation (months three to ten). Chapter 4 contains a list of the MS stakeholders contacted as part of this step. The full minutes of the interviews are included in Annex E. The non-MS consultees are listed in Chapter 5. Annexe F contains the full minutes of the non-MS interviews; and

4) Analysis and reporting of the consultation findings. The analysis involved a collation of minutes taken at all meetings with MS representatives (whether online or in person) categorised by key evaluation questions as per the Better Regulation Guidelines, as well as analysis of trends across MSs. The summary is included in Chapter 4 (MSs) and Chapter 5 (non-MSs).

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2.2.3 Outputs
The outputs from this task were:

- An analysis of the results of the Online Public Consultation (see Annex G);
- A report of the findings from the targeted consultations (see Chapters 4 & 5); and
- A synthesis analysis for sub-tasks 2.1 and 2.2, (see Chapter 6, and Annex I).

2.3 Task 3 - Workshops

<table>
<thead>
<tr>
<th>Table 2-2 Summary of Task 3</th>
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<tbody>
<tr>
<td><strong>Objective</strong></td>
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<td><strong>Sub-tasks</strong></td>
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<tr>
<td><strong>Deliverables</strong></td>
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2.3.1 Objective
The main objective of Task 3 was to organise two one-day workshops to discuss and validate findings of Tasks 1 and 2 and the ongoing work of Task 4. In agreement with the EC, the first workshop was held on 21st June 2018 and the second one took place on 13th November 2018.

2.3.2 Updated summary of the planned activities and methodology

Sub-task 3.1 Preparation of workshop papers
Although it was originally planned that each workshop would cover a specifically selected theme, during the Kick-off Meeting it was decided to focus the first workshop on gathering input and the second on validating results of other tasks. During the first workshop in June, the purpose was to gather information and input while also presenting our work completed to date. Prior to the second workshop, we completed the majority of stakeholder consultations and were therefore able to use this workshop to validate the results of this work.

Sub-task 3.2 Workshop organisation
It was agreed during the Kick-off Meeting that there would be two workshops instead of three. The first workshop was held back-to-back with a Committee of the Regions event in order to maximise participation, on Thursday 21st June. The workshop invitations were sent on 25th May 2018. The second workshop was held in the Renaissance Hotel, Brussels, on 13th November 2018. The workshop invitations were sent out on the 3rd of October.

2.3.3 Outputs of the task
The formal outputs from this task were the two workshop reports (Annex H), including minutes and feedback from breakout sessions.
In addition to this we produced several enabling outputs for the workshops themselves, such as invitee lists, invitations (with agenda and access details etc.), preparatory workshop papers summarising the work completed up to that point and PowerPoint presentations.

### 2.4 Task 4 - Issue-specific papers

**Table 2-3 Summary of Task 4**

| Objective | • To support the evaluation process of the EC by preparing around five papers on specific topics regarding the implementation of the 7th EAP. |
| Sub-tasks | • Sub-task 4.1 Develop issue paper template;  
| | • Sub-task 4.2 Data collection;  
| | • Sub-task 4.3 Analysis and reporting. |
| Deliverables | • Five issue papers. |

#### 2.4.1 Objective

The objective of this task was to develop issue specific papers for the EC, so they can be used as input for the evaluation of the 7th EAP.

#### 2.4.2 Summary of activities and methodology

The consortium developed an issue paper template for the EC to use to propose specific issue papers that they felt were relevant for their evaluation. This template, or work order form, has been used to propose five papers. Based on the presented issue papers the consortium has collected the relevant data via literature, or where appropriate via stakeholder interviews. These inputs were then analysed and used within the paper.

The five issue papers accompanying this study are:

- “Coherence between the 7th EAP, the Juncker priorities and the Sustainable Development Goals”;
- “The evolution of the EU environment and climate policy framework: from the 6th to the 7th EAP”;
- “The 7th EAP a sound environmental strategy?”;
- “The 7th EAP and its contribution to reaching the health, social and economic dimension of the Sustainable Development Goals”; and
- “Estimates of the environmental investment gap”.

A brief description of the objectives/background of each paper is presented below.

**Coherence between the 7th EAP, the Juncker priorities and the Sustainable Development Goals**

The first paper was completed by Öko-Institut and was submitted to Directorate-General (DG) Environment in late July. The complete paper is attached in Annex C.

The purpose of this paper was to assess the coherence of the 7th EAP with other EU strategies and international commitments, in particular the extent to which the 7th EAP’s nine priority objectives are aligned with the Juncker priorities and the 2030 Agenda’s Sustainable Development Goals (SDGs). This was analysed between the three policies in the form of ‘overlaps’ (full or partial overlap of different
policies’ objectives), ‘synergy’ (one policy promoting the achievement of another), ‘coherence’ (no negative interaction or even positive interaction objectives) and ‘incoherence’ (requiring trade-offs between objectives).

The evolution of the EU environment and climate policy framework: from the 6th to the 7th EAP
The second paper was completed by Trinomics and was submitted to DG Environment in early September. The complete paper is attached in Annex C.

The objective of this issue specific paper was to study and understand the development of the EU environment and climate policy framework, by looking in particular at the evolution from the 6th to the 7th EAP. The EAPs have been the cornerstone of environmental policy, providing an overarching framework for environmental action as well as allowing for continuity for over 40 years. In a rapidly evolving environmental and climate policy context, the programmes have reflected the thinking of the time, adapted according to new environmental threats and to the political and economic realities, and have been embedded in the broader framework of EU policy-making.

The 7th EAP: a sound environmental strategy?
The third paper was completed by Öko-Institut and was submitted to DG Environment in late September 2018. The complete paper is attached in Annex C.

This issue specific paper examines the 7th EAP from a theoretical perspective of what an environmental strategy can, and is supposed to, accomplish and examines if and to what extent the programme meets the criteria of a sound and well-designed strategy. It analyses the 7th EAP against the following criteria: a solid foundation (of evidence/policy); political commitment; adequate resources; vision, objectives and targets; monitoring, continuous learning and improvement; and broad participation.

The 7th EAP and its contribution to reaching the health, social and economic dimension of the Sustainable Development Goals
The fourth paper was completed in collaboration by Trinomics, Öko-Institut, and Technopolis-Group and was submitted to DG Environment in late November 2018. The complete paper is attached in Annex C.

The fourth issue specific paper examines how the policies defined in the 7th EAP help reaching the SDGs and in particular the health, social and the economic dimension. The research was split into two stages: the scoping and the detailed research. The scoping was based on the mapping provided in the first issue paper under this contract, and was split into three stages. The first aimed to complete the mapping from the first paper, putting the focus on how the 7th EAP objectives and policies support the implementation of non-environmental SDGs. The second step provided a list of recent key scientific studies about the interconnections identified. The third phase provided an agreed selection of interconnections which are of particular political relevance and/or on which the EC needs further evidence.

The detailed research then took the form of written summaries of the main findings in recent literature for each of these interconnections. The focus is on the interlinkages between environmental policies and social SDGs as well as those economic SDGs for which there is recent new evidence on how they are impacted by environmental policies. The detailed research is the final output of the issue specific paper.
Estimates of the environmental investment gap
The fifth paper was completed by Trinomics and was submitted to DG Environment in mid-December 2018. The complete paper is attached in Annex C.

This paper provides an overview of the different estimates on the investment gap in the EU, their sources, underlying assumptions, and degrees of robustness. It identifies what the different estimates of the environmental investment gap are, who made them, what their main assumptions are, if there are overlaps with different estimates, how they compare with current investment spending, and gaps in our knowledge. The focus is on environmental policies excluding climate but some of the key estimates for climate funding are also explained to allow for comparison and to put the topic in context.
3 Open Public Consultation: Analysis

3.1 Approach

The EC launched the Open Public Consultation for the period from the 3rd of May 2018 until the 26th of July 2018. The survey (as shown in Annex A) was responded to by 153 stakeholders from a variety of backgrounds (see Figure 3-1). A broad range of stakeholders was invited to partake in the survey, including representatives from international/EU/national bodies, from various industrial and business sectors (agricultural, energy, transportation, forestry etc.), NGOs, and think-tanks and academia. However, not all of the stakeholders that were contacted responded to the survey. Subsequently we drafted the Open Public Consultation Synopsis Report (see Annex G). Our approach for the summary report was a systematic question-by-question analysis, with a final section for any additional inputs/documents that the stakeholders wished to input. The results in the report were split into five parts: background information on the stakeholders, general questions on the 7th EAP, in-depth questions on the 7th EAP, success and improvement areas of the programme, and summaries of the attached documents provided. In the following sections the report has been further analysed to relate to the five evaluation criteria of the study: effectiveness, efficiency, relevance, coherence, and added-value. The questions from the survey were coded with ‘PC’ codes (Public Consultation), referring to the questions number, e.g. PC1 = Public Consultation question number one, to make referral across documents easier (see Annex A for reference).

In total 153 respondents completed the questionnaire. The respondents covered 22 of the 28 EU MSs. The majority of respondents were from Italy (16%), Belgium (14%), Germany (12%), and France (12%). Countries that did not respond were Cyprus, Latvia, Lithuania, Malta, Poland, and Slovakia. The high proportion from Belgium is due to several of the respondents being EU NGOs with their headquarters in Brussels. Most respondents were private individuals (69 in total, or 45% of the 153). 39 respondents (26%) were from NGOs, 17 (11%) were business representatives, and 16 (10%) were from public authorities. There were also responses from two academics, a citizen association and an EU institution.

Figure 3-1 - Open Public Consultation responses

Note that the views expressed below were made by different stakeholders, but do not necessarily reflect the views of the authors or the EC.
3.2 Effectiveness

The majority of the stakeholders largely agreed that the 7th EAP was an effective tool for allowing predictable and coordinated EU environmental and climate policy. The two effects in PC17 that most stakeholders either strongly agreed or agreed with were that the programme provides more environmental and climate policy predictability and facilitates MS policy coordination (69% and 67% respectively). In addition, this was described in the open answers (PC20), by eight of the stakeholders as a key success factor of the programme for providing more predictability (but also accountability) to the future of environmental policy on an EU level. It also allows such stakeholders to more actively participate in the policy-making process.

The Open Public Consultation further noted that the 7th EAP has engaged a broad variety of stakeholders, however its most engaged stakeholders were NGOs and public authorities. When responding to PC9, most participants from all backgrounds had heard of the 7th EAP on some level. NGOs were the group of respondents that were most engaged with the programme, with 48% of their respondents having a close familiarity (and only 5% not having heard of the programme at all). This was followed by Public authorities, of whom 37% had close familiarity with the programme. The group with the least awareness of the programme were private individuals, with 16 stating no awareness (80% of I do not know answers). Regarding the tangible effects of the 7th EAP in PC17, the effect that was least noticed (relatively) was of the 7th EAP leading to civil society participation for new environmental/climate policy. However, it is important to note that 44% of all participants believed the 7th EAP facilitates civil society participation.

With regards to the respondent’s belief in the programme contributing towards the achievement of its nine priority objectives, there was some degree of action noted in all nine objective areas. Objective two, particularly with regard to waste-prevention and the low-carbon economy were noted as the areas with most actions having been acted upon following the creation of the programme. From PC13 most stakeholders (22%) noted many actions for climate protection. Public authorities were most aware of climate protection, reduction of air pollution, and waste-prevention measures being implemented. Beyond this, for the same question, over 50% of respondents noted at least some action for the conservation of plant and animal life (objective one) and increased eco-friendliness of consumer products (objective two). For objective eight, a majority perceived action taking place within cities across Europe (PC15). From the 11 responses that stated they noticed many sustainable changes in cities, 36% were from businesses and 45% were from public authorities. This seems logical, as the groups most likely to implement sustainable changes in cities are from such stakeholder groups. Private individuals made up the largest group that perceived no change (65% of the 43 responses). The stakeholders noted that the objectives that required most improvement were objectives four (improved implementation of policy), five (an improved knowledge-base), and nine (addressing international challenges).

3.3 Efficiency

The stakeholders noted that the streamlining/mainstreaming of environmental protection concerns was one of the more positive aspects of the programme, although it was not mentioned if this provides cost saving benefits. In the open answers (PC20), seven of the respondents stated environmental and climate mainstreaming was one of the key successes of the 7th EAP. This was described by one of the respondents: as providing EU decision-makers with the possibility of identifying inter-linkages between
the different policy areas. Reducing overlapping policy was also viewed as a necessity for such strategies and can therefore be considered as a success of the overall programme. It was said to guide the EU’s climate, energy, transport, chemicals, food, resource and product policies. Several of these respondents noted that they were particularly glad to see the mainstreaming of human health implications with environmental issues.

With regard to how the 7th EAP addressed information gaps to better address efficient policy, the stakeholders noted this was an area of the programme where improvements could be made. 12 of the respondents in the open answers (PC20) noted that addressing such knowledge gaps would further facilitate transparency for the public and key stakeholders, allowing more actors (particularly civil society) to play a more decisive role in policy-making, implementation, and enforcement. The stakeholders agreed that the knowledge base should be based on a foundation of scientific data (as outlined in paragraph 73 of the 7th EAP).

### 3.4 Relevance

On the whole, most respondents thought the 7th EAP had a relevant focus and addressed the most pressing issues. The vision of the 7th EAP was particularly praised (PC11) with 55% agreeing that it had the right focus, and 33% strongly agreeing. This was similar with the confidence expressed in the three thematic objectives, where 50% agreed they had the right focus, and 33% strongly agreed. Overall it demonstrates that respondents are positive about the current breadth, longevity, and focus of the 7th EAP, and particularly so for the long-term vision. NGOs were more likely to strongly agree, and private individuals made up the largest representation of those who disagreed.

The areas that respondents believed required a stronger focus are outlined below:

- A deeper focus on citizen participation and environmental education as a driver for normative steering of future generations. One respondent discussed this as creating a strong “ecoculture” in schools;
- Digital transformation/Digital eco-systems;
- Indoor air quality;
- A focus on how to tackle overpopulation;
- A stronger focus on sustainable agriculture, forestry and land-use practices (particularly decreased land-usage). There are several aspects of deforestation and EU’s biomass lack of sustainability not addressed by the 7th EAP. Furthermore, food safety and sustainable consumption (i.e. dietary) practices were perceived as key areas of focus to achieve this;
- Tackling plastic pollution, micro-plastics, and plastic-substitutions;
- Closer links to other high-level environment/climate/energy strategies and policies, i.e. environmental mainstreaming;
- Recovery actions for biodiversity losses; and
- Mainstreaming of health issues. Although health is discussed a lot in the 7th EAP, many respondents stated that it could be more succinctly integrated with all policy areas: particularly energy, mobility, food, noise and water pollution, circular economy etc. One stakeholder added electromagnetic radiation as an additional health field to focus on.
3.5 Coherence

For coherence, it was noted in PC20 by seven of the respondents that environmental and climate mainstreaming with other EU policies was one of the key successes of the 7th EAP. In PC18, 60% of respondents believed that the programme was in part influential towards the achievement of the 2020 strategy. A very small percentage (7%) felt it did not have an influence on the 2020 strategy. The only respondents which submitted a negative answer were from NGOs (three) and private individuals (eight). Four survey participants noted that the programme was not included in (and was therefore not coherent with) the European Semester, this was felt to be an issue that should be resolved.

For the coherence with international commitments, 40% and 42% respectively stated that the 7th EAP was coherent with the SDGs and Paris Agreement. A small minority (4% and 7%) did not consider these coherent with the 7th EAP. However, several respondents noted that the 7th EAP requires more explicit links to international commitments, such as the SDGs. Furthermore, a few stakeholders suggested the need for closer cooperation and alignment with neighbouring third countries, i.e. promoting the 7th EAP objectives with these states was an important addition in order to achieve/promote social and climate equality.

3.6 EU-added value

It was clear from respondents that they believed the 7th EAP provided added value beyond what could be achieved without such a high-level strategy. In PC11, most of the respondents (84%) strongly agreed that a long-term vision to steer environmental and climate policy was necessary. Only one person disagreed with this statement. In the open answers (PC20), 17 of the respondents stated its added-value being that it steers towards more ambitious legislation, which further aligns the objectives of all EU MSs and facilitates pan-EU co-ordination. This was described by one stakeholder as further distributing the responsibilities between the EU and the MSs. It provides a conscious reminder to all that the Union requires environmental protection. This was possibly due to its clearly outlined objectives and strategic agenda.
4 Targeted Consultation: Member State Analysis

4.1 Approach

During the course of the study, the consortium spoke with representatives from 15 different MSs, all representing the environment (or equivalent) ministries of their respective MS. The consortium emailed 19 MSs, for which the EC provided the contacts. Nine MSs had no contact. All the contacts were emailed 2-3 times to ensure that they had received the consultation request. From these, 4 MSs did not respond to the targeted consultation. Our approach to the final targeted MS consultations was mixed, and in some cases defined by the nature of our interaction. For example, some MSs were in close proximity to our offices in the Netherlands and Belgium, so we met them face-to-face, for focus groups. In other cases, we used video or telephone conferences, with multiple people on the line. In other cases, MSs wished to respond in writing via email. The complete minutes are included in Annex E, and the table below shows a summary of the MSs interviewed and our approaches.

Table 4-1 - Member State Interviews

<table>
<thead>
<tr>
<th>Member State</th>
<th>Format</th>
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<tbody>
<tr>
<td>Austria</td>
<td>Teleconference</td>
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<tr>
<td>Belgium</td>
<td>Face-to-face focus group</td>
</tr>
<tr>
<td>Bulgaria</td>
<td>Face-to-face focus group</td>
</tr>
<tr>
<td>Cyprus</td>
<td>Written input</td>
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<tr>
<td>Czech Republic</td>
<td>Written input</td>
</tr>
<tr>
<td>Estonia</td>
<td>Written input</td>
</tr>
<tr>
<td>Finland</td>
<td>Teleconference</td>
</tr>
<tr>
<td>France</td>
<td>Teleconference</td>
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<tr>
<td>Germany</td>
<td>Teleconference focus group</td>
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<tr>
<td>Ireland</td>
<td>Written input</td>
</tr>
<tr>
<td>Italy</td>
<td>Written input</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>Teleconference</td>
</tr>
<tr>
<td>Netherlands</td>
<td>Face-to-face focus group</td>
</tr>
<tr>
<td>Poland</td>
<td>Written inputs and video conference</td>
</tr>
<tr>
<td>United Kingdom (UK)</td>
<td>Teleconference focus group</td>
</tr>
</tbody>
</table>

The remainder of this chapter summarises the key results of our interactions with MSs grouped per evaluation question.

4.2 Effectiveness

4.2.1 At which governance level(s) (EU, national, regional, local, none) has the 7th EAP been useful in helping to address environmental concerns?

The main message resulting from the interviews conducted with MS representatives was that the 7th EAP was useful for providing an overarching strategy at the EU level that can be used or referred to at all levels of governance if desired. This was suggested by Austria, the Czech Republic, Estonia (who also...
viewed the 7th EAP as a package with other documents such as Europe2020 and the SDGs). Many other MSs highlighted the importance of the 7th EAP’s long-term vision e.g. Finland. Others highlighted the importance of the 7th EAP in setting a framework and priorities for actions in the environmental sector to all MSs, while serving as a collective database of environment-related initiatives, including environmental legislation (Germany, UK and France). All this serves to underline the importance of the document for high-level strategic guidance. Scotland (UK) underlined that it is important to have a sense of overview and consensus about what the challenges are, even if implementation and detailed policy are devolved.

Bulgaria suggested that the 7th EAP was more accessible than documentation on Directives, making environmental policy as a whole more understandable and easier to follow than specific legislation, resulting in its use in several national discussions, legislation, goals and policy (although there are indeed some policies that make no reference to the 7th EAP). However, Bulgaria also highlighted that perhaps it is true that no policy has been specifically adopted just because of the 7th EAP. Some MSs also suggested that national level action comes more from specific legislation rather than from the 7th EAP (e.g. Bulgaria, Germany, Luxembourg, the UK and France).

Many interviewees suggested that the 7th EAP provided a useful reference document, whereas others had referred to it infrequently. As an example, from the personal experience of one of the interviewed experts that worked for the EP in the past, the 7th EAP can serve as guidance to help understanding about the principles behind environmental policy-making in the EU and stimulate action. For her, the 7th EAP was on her desk and she used it in memos and documents to hold others accountable for action.

Finland suggested that the EP and NGOs attach more importance to the 7th EAP than the EC does. On this note, it was pointed out that the EP uses the 7th EAP in letters to highlight failures and that it offers an easy reference document for the EP since it collates all environmental policy in one place (Germany). It was also pointed out that the 7th EAP is “politically useful,” having been debated and approved by the Council and the EP, which gives it political credibility (Austria, Cyprus, Finland). Austria made the point that the current iteration of the 7th EAP was politically-speaking, more effectively binding than previous documents, since it had been agreed by the EP and the Council. According to Austria, national environmental policy is closely based on EU policy and the more that is done at an EU level, the more that will be done at the country level. Austria also suggested that the implementation focus of the 7th EAP was effective at pushing stronger consideration at the national-level and (for Austria) at the provincial level.

Some MSs suggested that the 7th EAP was too complex for regular use (Germany). Others also suggested that the current EC does not appear to have much ownership of the 7th EAP.

There was a comment which provided a less positive perception of the 7th EAP. The Netherlands reported that they were unsure of the need for a 7th EAP. Their argument was that EAPs take a long time to develop and there is little room for getting their input into strategies. Nevertheless, they felt in the minority on this issue in the EU, so they therefore supported the 7th EAP. Their reason for support was to make the strategy as useful as possible, by focusing its design on effective implementation and integration of environmental legislation.
On the political use made of the 7th EAP, Finland stated that they feel the European Council refers to the 7th EAP in its work (as a justification for action). Germany raised the point that the MSs referred to the 7th EAP in a letter to Juncker, when he became EC president, in order to keep continuity on environmental policy from one EC mandate to the next.

4.2.2 How has the 7th EAP influenced national environment and climate policy-making?

Overall, and as specifically mentioned by the UK and Poland, none of the national strategies “directly quote” the EAP. However, many MSs described the 7th EAP as being there in the background, as a means of reflecting the policy framework at the EU level.

In some MSs, the 7th EAP has been taken into consideration for the development of national climate policies (e.g. Cyprus, the Czech Republic and Finland). For example, Cyprus stated that they have explicitly taken the 7th EAP into account in the development of its national strategy on climate change mitigation and adaptation. In other MSs, the 6th EAP was also significantly (or even, in some cases, more) impactful in this area. For example, Estonia referred more to the 6th EAP than the 7th EAP for setting up its environmental policy framework. On the other hand, other MSs had no memory of the 7th EAP being used directly in policy (e.g. Luxembourg). In other cases, the EAP is not referenced explicitly in climate policy, although the general principles are reflected – this was the case for example in the UK and Poland.

Most MS-level environmental legislation is based on specific Directives taken from the EU, rather than being based explicitly on the 7th EAP – this feedback was received from Austria and Finland for example. Italy provided a very specific example of its environmental policy having been influenced by the 7th EAP but more specifically determined by a specific legislative detail, i.e. Article 68 of Law 221/2015 environmental measures for promoting green economy and limiting the excessive use of natural resources (so-called “Collegato Ambientale.”) Other MSs, such as Poland, suggested that other European initiatives were important to the decision-making process, such as the European Semester, National Reform Programs and EIR.

4.2.3 Specific national policy/strategy influenced by the 7th EAP

The diversity of regulation influenced by different parts of the 7th EAP highlights its effectiveness in guiding policy in different MSs. Some MSs suggested that through EU law, the 7th EAP has influenced all environmental legislation/policy in the country (e.g. Austria). On the other hand, Luxembourg claimed that government representatives quoted the 7th EAP in policy discussions but felt that they were constrained from quoting it in legal documents because of the lack of legally binding power from the 7th EAP.

Other MSs suggested that although EU law (i.e. Directives and their transposition) have been more pertinent to defining national policy, some specific policies have been directly influenced by the 7th EAP, for example:

- Bulgaria’s 2020 National Development Programme and Waste Strategy refer to the 7th EAP;
- Cyprus suggested that several national developments were influenced by the 7th EAP: the SDG Report for Cyprus (2017), the Biodiversity Strategy, the Action Plan for Soil Sealing, the Climate Change Adaptation Strategy, the Waste Management Strategy, and the amendment of various existing pieces of legislation to ensure their environmental coherence and efficiency;
• In Finland, the 7th EAP has indirectly influenced the Finnish Ministry of the Environment’s strategy and its revision. There is also a link to 7th EAP in the National Waste Plan to 2022 (from recycling to a circular economy), Air Pollution Control Programme and National Water Protection Policy, which all stem from various directives. The national air pollution control programme required by the National Emission Ceilings (NEC) Directive is currently under preparation in Finland. It is likely that the 7th EAP will be addressed in this programme in some way, for example by referring to the significant improvement of outdoor air quality and the need to move closer to WHO recommended levels;
• In Italy, both the Collegato Ambientale2 (focusing on natural capital) and Made Green in Italy3 (focusing on resource efficiency) have been influenced by the 7th EAP;
• The 7th EAP’s natural capital approach is the underpinning element of England’s 25-year Environment plan, whereas in Scotland and Wales the resource efficiency approach of the 7th EAP has been particularly influential. Scotland suggested that the 7th EAP was helpful in obtaining cohesion policy support for green infrastructure projects in cities. Furthermore, the 7th EAP was taken into consideration during the development of the Environment Act, in particular with reference to discussions on resource efficiency (circular economy) and the resilience of biodiversity (where a combination of 7th EAP and the EU Biodiversity Strategy was used). Nevertheless, the 7th EAP is not specifically mentioned in any documentation;
• In the Czech Republic, the State Environmental Policy (SEP) and the Strategy on Adaptation to Climate Change have been influenced by the 7th EAP;
• In 2017, Estonia adopted two strategic documents, which were influenced by, among other international policies, the 7th EAP - long-term low greenhouse gas emission strategy for 2050 “General Principles of Climate Policy 2050” (GPCP2050) and the Estonian Energy Sector Development Plan 2030+. Furthermore, by 2020 Estonia will have a Circular Economy Action Plan in place to take over the concept of the circular economy and resource efficiency as per the 7th EAP; and,
• Poland recently prepared a draft of the National Environmental Policy 2030 (one of nine integrated strategies, that covers the environmental sector in Poland), which is fully in line with the 7th EAP. Adoption of the document is foreseen in early 2019 and the Ministry of the Environment has recently initiated public consultations.

A number of MSs mentioned concepts that are included in the 7th EAP, that are in their national approaches, but they felt that it would be difficult to make a direct causal link. Examples of this were:
• Concepts mentioned in German policy (but not a concept unique to EAP);
• Cross sectoral approach used in national policy structure (Italy);
• More data collected (for EEA), partially as a result of 7th EAP (Luxembourg);
• Used in applications for EU money (e.g. Horizon 2020, and LIFE [L’Instrument Financier pour l’Environnement]) - (UK and Germany);
• Financial instruments are present in a number of environmental programmes, as suggested in EAP, but the causality is not known (Finland); and
• Of the other cross cutting objectives in the 7th EAP the objectives relating to improving evidence and the knowledge base is one that Wales feel they have pursued, with the focus on the availability and robustness of natural resources being central in Welsh environmental

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policy making, and this requires a strong evidence base. The origin of this approach in Wales is linked to the United Nation (UN)’s SDGs, rather than the 7th EAP though (UK - Wales).

4.2.4 The nature of this influence?

Interviews with different MS representatives suggested that the influence of the 7th EAP has been different in different MSs. In some MSs the influence is more direct (as with Bulgaria, Cyprus, Poland), while in others it is indirect (as with Finland and the Netherlands). Another distinction can be drawn from the different areas of influence of the 7th EAP. For example, in some MSs the 7th EAP’s natural capital approach and the resource efficiency approach were both mentioned as influential, whereas in others only one or neither of these was mentioned. Italy highlighted that the 7th EAP had enabled an increased focus on natural capital in recent years. In other cases, the importance of the 7th EAP approach to well-being was highlighted, for example in Finland’s air pollution control programme. The UK highlighted the importance of a specific methodology stemming (in part) from the 7th EAP, that is the EIR, the results of which have facilitated internal discussions across ministries, facilitating work on some of the challenges presented by the devolved structure in the UK. (NB: during interviews it was suggested that the ban on plastic microbeads emerged from discussions stimulated as a result of the 7th EAP.)

In England (UK), the 7th EAP has been particularly influential with regard to the Natural Capital approach, which is an underpinning element of England’s 25 Year Environment Plan. The EAP is useful in giving the EU context and linking this to international priorities, like SDGs, which are important along with national priorities. In Scotland (UK) the 7th EAP is regarded as a significant influence and relevant when defining policy. For Scotland, the circular economy concepts mentioned in the 7th EAP are a policy area that Scotland has taken up and developed extensively.

Other MSs have highlighted the 7th EAP’s ability to influence through setting an overarching framework for environmental issues, as well as raising awareness. Once again, this serves to underline the perceived importance of the 7th EAP as a strategic document. Germany underlined the indirect local and regional influence of the 7th EAP, claiming that the 7th EAP has been important in inspiring specific directives, whereas Estonia suggested that the 7th EAP’s importance was in additionally stimulating regionally and locally important programs such as the Covenant of Mayors.

Some MSs perceived the 7th EAP as directly influential on national-level policy. Bulgaria suggested that the 7th EAP had a direct influence and that without the 7th EAP, specific actions at the national level would not have occurred. Bulgaria also stated that the 7th EAP was mentioned in the strategy of their Ministry of finance. Estonia on the other hand suggested that the main influence of the 7th EAP was to set the framework and raised awareness of environmental issues, for example developing national strategies to set national long-term goals for different environmental and climate issues.

4.2.5 Have there been any specific actions that have derived from the 7th EAP and/or did the 7th EAP help to implement EU environmental and climate law?

The response from MSs to this question suggests that it is challenging to assign direct causality between the 7th EAP and specific actions. Some MSs suggested that since most national policy is defined by EU policy, and EU policy is based on 7th EAP priorities, then the 7th EAP indirectly impacts national policy. Other MSs give more specific examples, such as Austria suggesting that since the Habitats Directive was mentioned in the 7th EAP, its implementation in Austria received stronger support.
In terms of implementation, the EIR appears to have had substantial influence in some MSs, for example pushing more action at the national level in Austria. Italy suggested that their Ministry of Environment was now supporting studies on alternatives to per- and polyfluoroalkyl substances (PFAS) under their chemicals activities (possibly driven by the 7th EAP). Luxembourg and the Netherlands also suggested that actions relating to chemicals were closely linked to the 7th EAP. The UK emphasised the effectiveness of the 7th EAP in improving the comparability of environmental information across the EU, which is then useful to set national-level action (e.g. the UK referenced EU data in the evidence annex of its 25 Year Environment Plan).

The framework of the 7th EAP for the protection of natural capital is considered as a key reference for the approach to the protection of environment in Italy. Within the lines traced by the 7th EAP, actions put in place at the national level stimulate the adoption by local authorities of environmental accounting systems and the drafting of environmental budgets. The aim of these is to monitor and track the implementation, effectiveness and efficiency of policies and actions in order to protect the environment. This example from Italy highlights 7th EAP-related monitoring and the need for Italy to define actions in this regard.

4.2.6 Has the EAP made the decision-making process for environmental and climate-legislation more effective?

The overwhelming response to this question was “yes.” Austria suggested that the 7th EAP stimulated the emergence of legislative proposals at the level of the European Council, suggesting that the 7th EAP assigned increased legitimacy to the topics it covered. Other MSs suggested that the 7th EAP has helped to integrate climate and environmental concerns into other policy areas (e.g. Bulgaria and Estonia). Other MSs simply highlighted the importance of the 7th EAP as a strategic tool to set out clear objectives and drive policy at MS level (e.g. Cyprus and France). Poland suggested that the 7th EAP had an indirect impact on the decision-making process, while other European initiatives are also important to the process.

The UK mentioned that the process of the EIR itself was very useful, particularly as a vehicle for discussion across Ministries within Government and the opportunity for debate between Ministers and senior officials at the EU level (e.g. Environment Council, Informal Environment Council, meetings of the various EC DGs). As such, the process had quite high political visibility.

4.3 Efficiency

4.3.1 Was the 7th EAP useful in achieving the following: synergies between policy/initiatives/actions (in terms of the cost/efficiency of implementing them) and streamlining between these actions?

There was a mixed range of responses to this question. Some MSs suggested that the 7th EAP was definitely useful in achieving synergies and streamlining actions, including Austria, Poland and Cyprus. Most other MSs expressed some doubt, for example Bulgaria and Italy suggested that the 7th EAP was not really useful in this regard or at least not in a specific way, whereas the Czech Republic suggested that the 7th EAP was partially useful. Other MSs suggested that there are so many other factors at play that the extent of synergy/interaction between policies is not defined by the 7th EAP (UK). The UK also

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raised an interesting example of Catchment Sensitive Farming\(^5\) projects, which successfully link different policy areas. Luxembourg also mentioned several policy initiatives with concrete actions linking to the 7th EAP, providing the example of its organic farming target.\(^6\)

### 4.4 Coherence

Throughout the interviews conducted as part of this study, MSs suggested that there were several synergies between the 7th EAP and other policies, whether at the cross-national level or at the national level. Poland for example was positive about the ability of the 7th EAP to ensure linkages, suggesting that the 7th EAP indicates interlinkages among policies and hence that those interlinkages are being transferred to the national level. Austria also highlighted the ability of the 7th EAP to foster the integration of policies, albeit in collaboration with these other policies rather than as a steering force. Some MSs suggested that other EU strategies are higher profile, such as Europe2020 and that the 7th EAP was just one of many such strategies “fighting for attention” (Bulgaria, Finland).

Other MSs (the Czech Republic, Estonia and Italy) suggested that the 7th EAP had stimulated interaction between different national policies, as well as stimulating the development of processes at the local level (i.e. through the Covenant of Mayors). The Czech Republic, however, suggested that the 7th EAP was used as a thematic document, in conjunction with other crucial documents such as the Paris Protocol. Italy and Poland also suggested that the 7th EAP was useful in facilitating the translation of a coherent picture from the EU level to the sub-national and local level, while enhancing the understanding of positive synergies across environmental policies and ensuring coherence and complementarities of national and local actions. Poland suggested that the 7th EAP tends to act more as a justification for implemented actions rather than their trigger, since the 7th EAP is perceived as a guideline or a reference document for national strategies and programmes ensuring the predictability of environmental policy.

Estonia suggested that the 7th EAP should have been more useful in achieving synergies between different policies and/or initiatives, for example by influencing the European Semester, the MFF 2014-2020 (Multiannual Financial Framework), circular economy package, etc. Italy also suggested a synergistic improvement, in that synergy between the 7th EAP and Horizon 2020 could be better.

Some MSs such as France acknowledged the difficulties in integrating the environment more fully into all public policies, and the inherent challenge therefore present for overarching programmes such as the 7th EAP. The UK also acknowledged such challenges, indicating that it is difficult for DG Environment to “force” other DGs to integrate environmental policies and as a consequence taking a softer approach which can make the language vague while removing obligations. The UK also suggested that it is challenging to achieve policy synergy but that it is important for the EU to continue to push for this through initiatives such as the 7th EAP (e.g. agriculture remains an important area for this).

Suggesting thorough and well-thought-out change, Finland suggested that the integration of climate and other environmental concerns, including biodiversity, in all economic and social activities still requires

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further attention, and therefore drafting and agreeing on a comprehensive new environment programme for the next 7-10 years would seem appropriate.

4.5 Relevance

4.5.1 Has the 7th EAP been useful as a strategic document to you/your institution?

Most MSs suggested that the 7th EAP has been useful as a strategic document, providing a wide-ranging vision for consistent and long-term policy making at the MS level. MSs that emphasised how useful the 7th EAP has been in offering this longer-term perspective include Bulgaria, Cyprus and the Czech Republic. Others highlighted the importance of the 7th EAP in providing an evidence base - a legal reference point (e.g. Germany) - to ‘defend’ national policy-making, guiding intermediate steps. One MS suggested that the document was “indispensable” and “fundamental” (France). Estonia and Poland highlighted the importance of the 7th EAP in providing an integrated approach useful for overall strategy setting and structuring, while providing a combined EU/MS approach.

Although the 7th EAP is a relevant document, Austria highlighted that it is one of many EU documents that is useful as a basis for policy and therefore is relevant only within that context. Austria claimed that the 7th EAP was not redundant, and should be considered complementary/additional to other policy documentation. Finland and the UK also highlighted that the 7th EAP was not unique but remained useful particularly for setting priorities, and for specific issues such as helping the UK formulate a long-term environmental policy for itself in a post-Brexit position. This lack of uniqueness was further highlighted by comparison to other policy areas, such as the SDGs which are also used to provide a long-term vision. It was regularly suggested that for continued relevance, the 7th EAP should further align with these other policy aspects (UK). The next iteration of the EAP should also contain increased reference to emerging environmental challenges (as was done to a certain extent in the current iteration) for example to “future-proof” issues such as chemicals.

On the political side, France emphasised the continued usefulness of having tool such as the 7th EAP to express agreed priorities for harmonised action across the EU and MSs. This politically agreed aspect also helps to ensure the continued relevance of the document, since it covers broad goals (Germany).

Luxembourg and the UK suggested that although some EU-led actions on environmental policy have been stimulated (e.g. chemicals), these are generally still lacking and should be further stimulated through the EAP agenda. This is to ensure coordination of policy approaches where needed, since by definition MSs are able to make their own national policies in a more practical way. Luxembourg suggested that having more quantifiable objectives and steps to 7th EAP target achievement would help in this regard.

4.6 EU-added value

4.6.1 Was it beneficial to have the 7th EAP, as opposed to just MS-based objectives?

The overarching response to this question was yes. Bulgaria suggested that the EAP process should be kept since it provided an effective policy approach. Cyprus praised the overarching nature and direction for implementation. The Czech Republic and France stated that the priorities for action were essential while Estonia and France also picked out that the 7th EAP was essential for stimulating actions that require transnational responses. Germany suggested that the 7th EAP would remain essential as a
reference point to provide long-term goals for policy coherence and to hold legislators accountable at the EU level. The UK pointed out that the 7th EAP had proved useful in the past as a way of helping to justify applications for specific EU project funding.

Some MSs suggested that the added value of the 7th EAP was to generate dialogue and raise awareness. Others highlighted the importance of the 7th EAP for specific policy areas, such as chemicals policy, which is referred to within the 7th EAP (Netherlands). Some MSs suggested that this area could be improved in the next iteration (Luxembourg). Some MSs also suggested that the added value of the 7th EAP was unclear since it was difficult to separate from specific EU policy initiatives (Finland), whereas others suggested that they had not conducted an evaluation themselves and therefore could not be sure (Germany).

Most interviewees from the consulted MSs were positive about the continuing importance of an EAP, offering suggestions for important aspects to include in a possible 8th EAP. One of the overarching aspects suggested by interviewees referred to the need for any next iteration to be shorter (Germany suggested a three-page document) and simpler (Germany), while ensuring continuity with the 7th EAP (Bulgaria). Germany and Luxembourg (among others) also highlighted the importance of monitoring, while underlining the need for a balance between flexibility and policy strength e.g., “if you do not make a concrete proposal, you will also never get it.” (Germany). Some specific pointers were provided regarding an 8th EAP, which are useful to stimulate reflection on what might have been essential in or missing from the 7th EAP, including:

- Increase attention to integration across policy areas (Netherlands);
- Include SDGs (Netherlands, Germany) such that the 8th EAP and the SDGs are mutually reinforcing (UK);
- Translate the EAP into a business case (Netherlands) and improve the link between business and industries (Bulgaria);
- Align with the 2030 agenda (Netherlands, Bulgaria) and particularly with the Strategic Plan for Biodiversity 2030 (Bulgaria);
- Develop a strategic masterplan structure, focusing more on integration and less on detail (Netherlands);
- Obtain signatures from more commissioners to increase political support and/or credibility (Netherlands);
- Allow increased flexibility for the integration of future developments (Netherlands);
- Ensure shared responsibility across MS and EU institutions (Estonia);
- Continue to set broad and common environmental goals at the EU level (Estonia, Germany) focusing on coherence with existing policy efforts (Germany);
- Implement a more focused approach (Finland);
- Strengthen the link to political decision-making to ensure that the document does not lose its strategic angle (Finland);
- Implement more quantifiable objectives and steps to achieve targets (Luxembourg);
- Include an official mid-term evaluation and a monitoring system (Germany, Luxembourg, Bulgaria);
- Include an improved and more logical structure and numbering (Germany);
- Create a to-do list, with more precision on how to achieve coherence and integration (Germany);
- Re-work the scope, for example: strengthen the linkage between environment and health, improve coverage of air pollution and domestic heating, and consider Smart Cities (Bulgaria);
Integrate behavioural aspects (Bulgaria);
Improve communication aspects, in particular at the regional level (Bulgaria);
Strengthen action plan elements while providing concrete guidance (Bulgaria);
Continue respect for subsidiarity (UK);
Include strategic guidance in the environmental sector (Poland) and continue the overall action-orientated strategic framework of the EAP (Bulgaria);
Include some more specific targets (the Czech Republic);
Provide a long-term and broad strategy towards 2030 (i.e. covering all environmental goals and actions).

Poland mentioned a specific example in response to the question on EU added value suggesting that while the 7th EAP was influential in setting the new National Ecological Strategy, the 2030 Agenda and its SDGs that cover all policies, including environmental ones, have recently become more recognisable - both in Poland and globally - as a universal framework document.

4.6.2 Has the EAP helped to develop a shared understanding about environmental and climate-policy-challenges between MSs and the EU Institutions?

Generally, the response was yes, including from Austria, Bulgaria, the Czech Republic, Cyprus, Estonia, Italy and Poland. MSs also highlighted that their involvement during the development of the 7th EAP was an important process to remind the EC of sub-national variations in approach (e.g. the variance of the provinces in Austria). Germany also had a positive view of their informal and formal involvement in the development of the 7th EAP. Bulgaria commented that the involvement also helped with integration, for example by engaging ministries other than those with an environmental remit. The 7th EAP has helped to demonstrate where EU-level (or multiple/cross-MS) action was needed (the Czech Republic).

The EAP in relation to the EIR (at the MS level) has provided a level of understanding between environmental and climate policy challenges between Cyprus and the EU that has helped to identify strengths, weaknesses and gaps. For Finland, the 7th EAP has helped present global and European environment challenges and a bigger picture, providing predictability regarding future policy developments and increased ownership and mobilisation for action on environmental policy among key stakeholders. Finland also mentioned that some environment and/or climate issues obtained more attention at the European Council level or other fora. Some environmental issues may have less weight in the public discussion and in such cases an 8th EAP might be useful by making the EC and the MSs define a way forward.

Interviews with French representatives offered a hopeful perspective for the future of the EAP. The shared nature of the document between the MSs and the institutions of the Union, but also with civil society involved in drawing up this action programme, guarantees the importance and legitimacy of the 7th EAP (and any subsequent EAPs) as these factors indicate full alignment with the co-construction of an ambitious European environmental policy. The UK echoed this judgement, highlighting that the EU is seen as a global leader in environment and an important voice for global agreements. Unifying programmes such as the 7th EAP (and other long-term commitments and priorities) have helped to achieve this global positioning through ensuring political buy-in and support from citizens and businesses (given that long-term planning is in their interest).
5 Targeted Consultation: Non-Member State Analysis

5.1 Approach

We contacted a large and diverse pool of stakeholders, identified by the project team in collaboration with DG Environment. We spoke with representatives from 18 different non-MS stakeholders. These were based on the responses from the originally contacted pool (from the Open Public Consultation and Workshops), and their interest and knowledge of the programme. There were some occasions where stakeholders did not feel they possessed sufficient knowledge of the programme to be interviewed. The responses ranged from industry and political associations, international environmental agencies, NGOs, and private businesses. All interviewees were provided the background for the study and the outline of the questions (see Annex F) prior to any meeting. Our approach to the interviews was adjusted in line with the knowledge of the interviewee on the 7th EAP. A few of the interviewees noted during the interview that they were inexperienced/unaware of the strategy and therefore had limited input to provide. In these cases we kept the interviews short and tried to identify key areas where their input could be valuable (i.e. aspects the 7th EAP that could improve so as to make it of more use to them).

Most interviews were held online, however one stakeholder had a face-to-face meeting in the office of Trinomics. The interview minutes are included in Annex F and Table 5-1 lists the non-MS interviewed.

Table 5-1 - Non-MS Interviews

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Date of Interview</th>
</tr>
</thead>
<tbody>
<tr>
<td>European Recycling Industries Confederation (EuRIC)</td>
<td>28/08/2018</td>
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<tr>
<td>Association of Cities and Regions for sustainable Resource management (ACR+)</td>
<td>30/08/2018</td>
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<tr>
<td>Sustainable Economy Association (SEA)</td>
<td>31/08/2018</td>
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<tr>
<td>Piraeus Bank</td>
<td>31/08/2018</td>
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<tr>
<td>European Environment Agency (EEA)</td>
<td>04/09/2018</td>
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<tr>
<td>Birdlife Europe</td>
<td>07/09/2018</td>
</tr>
<tr>
<td>Municipal Waste Europe</td>
<td>10/09/2018</td>
</tr>
<tr>
<td>European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL)</td>
<td>06/09/2018</td>
</tr>
<tr>
<td>European Chemical Agency (ECHA)</td>
<td>04/09/2018</td>
</tr>
<tr>
<td>BELLONA (Environmental NGO)</td>
<td>05/09/2018</td>
</tr>
<tr>
<td>Environmental Law Centre - representing The International Union for Conservation of Nature (IUCN)</td>
<td>06/09/2018</td>
</tr>
<tr>
<td>Bureau Européen des Unions de Consommateurs (BEUC)</td>
<td>07/09/2018</td>
</tr>
<tr>
<td>The Health and Environment Alliance (HEAL)</td>
<td>10/09/2018</td>
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<tr>
<td>United Nations Economic Commission for Europe (UNECE)</td>
<td>11/09/2018</td>
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<tr>
<td>MVO Nederland - de groene zaak (leader on Biodiversity Business Platform)</td>
<td>12/09/2018</td>
</tr>
<tr>
<td>European Chemical Industry Council (CEFIC)</td>
<td>13/09/2018</td>
</tr>
<tr>
<td>The European Renewable Energies federation (EREF)</td>
<td>13/09/2018</td>
</tr>
<tr>
<td>Ecoacsa (Biodiversity markets NGO)</td>
<td>14/09/2018</td>
</tr>
</tbody>
</table>
5.2 Effectiveness

5.2.1 To what extent has the 7th EAP enabled more predictable, faster and better coordinated actions by the EU and the Member States?

Two of the respondents noted the effectiveness of the 7th EAP in creating predictability of environmental legislation. One suggested that it is a good planning tool, giving policy makers a to-do list and outlining how to reach objectives. Some stakeholders stated that it provided continuity spanning across the EC that created the programme to the current EC. This was a very positive aspect of the programme, as according to them it aligned the EC’s priorities beyond a five-year period. The other stated that the predictability is only effective in the first half of the EC’s term, as they are looking forward on what legislation to initiate. Towards the end of the EC’s period, the legislative actions stop and therefore the 7th EAP is less helpful in predicting what is coming. However, three stakeholders noted it was more important in its use as an accountability measure, particularly for NGOs.

According to several respondents, there was a positive assessment of the EC actions in the area of green and circular economy and climate change mitigation (objective two). However, the progress related to public health and chemicals (objective three) has been perceived as very poor. One NGO argued that this lack of progress was due to a lack of political will.

As regards the coordination of actions by the EU and MSs, three stakeholders noted that there are large differences in legislative implementation across the MSs, and this needs to be addressed. This was particularly the case for waste shipment and circular economy legislation, which was described by another stakeholder as poorly implemented. It was perceived to be caused by:

- The lack of MS staff capacity to deal with technical implementation; and
- The level of interpretation of the MSs in the transposition of EU policy.

Another stakeholder noted that for MS environmental/climate/energy ministries the 7th EAP was playing a role in coordinating their actions, particularly in regard to the circular economy and assisting with knowledge gaps. A MS network association noted that the 7th EAP was considered to be a driving force in their focus on the better coordination of actions and environmental policy implementation amongst MSs. This was particularly outlined by DG Environment, which encouraged the NGO to launch a survey of its members in 2014 (which was repeated in 2017). The survey was designed to identify the barriers in the members’ daily practice for environmental legislative implementation.

Another NGO noted that while there was little progress under objective three at the EU level, some MSs have moved ahead with their local policy agenda building, addressing health and chemicals challenges without waiting for guidance from the EC. An industrial expert was more critical, saying that overall improvement in policy is not driven by the 7th EAP, but by political guidelines of the EC and the Better Regulation process, which comes from other initiatives (consultation etc.)

5.2.2 To what extent has the 7th EAP been useful in engaging different stakeholders?

All of the stakeholders interviewed were, to some degree, aware of the programme. However, from the interviews it was notable that members of NGOs and public agencies were more aware of the specifics of the programme and were more engaged with it. Two stakeholders noted the 7th EAP had been best at engaging stakeholders during its development phase (due to the participatory policy-making process). However, one of the stakeholders from an association stated that beyond setting the goal-posts in the
development phase, they were not effectively engaged by the programme. Another stated they were not overly engaged by the programme, but rather focused on the resource efficiency roadmap and the Circular Economy Action Plan, as these related more explicitly to their daily practices.

In regard to its engagement of other stakeholders the 7th EAP was noted by several different interviewees to be relatively good at engaging with a large variety of stakeholders (however one noted there is no specific measure to achieve this). Most of the stakeholders from NGOs (large scale EU/international NGOs) reported having been actively involved in the 7th EAP’s preparation, which they appreciated. The same stakeholders said they were also involved in policy discussions related to the low carbon topic during the 7th EAP implementation. It was felt that the language and vision provides a basis for all to be involved in the discussion on the future of environmental issues. Furthermore, it was stated by one of the interviewees that the 7th EAP had been useful as a tool for their agency for attracting interest and engagement into particular topic areas in the field of the environment. It was noted as not necessarily needing to be business friendly as that is not the objective of the document, it should merely outline the clear societal, economic, and environmental priorities for all actors to follow.

An international organisation interviewee (while being positive about the overall effort of the EU in environmental policy) noted that the EC did not consult them in the elaboration of the 7th EAP. Subsequently the stakeholder felt that it did not strongly relate to their work. According to this stakeholder, the 7th EAP lacked coordination and did not attempt to look at what already existed in their programme.

Stakeholders from the business and agriculture sectors (associations), as well as from cities networks contacted for the interview had little or no information on 7th EAP, which could be taken as an indication of failing to engage this group of stakeholders. However, these stakeholders are familiar with the specific pieces of legislation referred to under the 7th EAP. This is a recurrent theme, where stakeholders focus on the issue of most relevance to them.

An industrial organisation suggested that the EC should involve cities more in their activities, given that cities can be useful allies for DG Environment and DG Climate Action, and are easier to work with than national governments (especially those MSs that are delaying process, because they are not like-minded and pose obstacles to the EC). They also felt that the EC should involve stakeholders down to the local level. Citizen initiatives & cities are much faster in implementing environmental policies than national governments, therefore the EC involving such local-level stakeholders should mean more success in regard to the implementation of EU initiatives. This approach was felt to have the potential to generate strong added value. Local-level involvement would not only help the implementation of the EAP but would help the EU project at a larger scale.

5.2.3 How has the 7th EAP structure contributed towards achieving its nine priority objectives?

The two stakeholders who answered this question stated the structure suited the purpose of achieving the objectives. One was less positive, noting that the objectives/themes were the most important aspect and the EAP can be structured in a variety of ways without losing impact. However, the other stakeholder noted the structure of the programme was very useful for their purposes, such as the listing of action areas (for example Paragraph 28, for objective one). However, overall the most important factor in impact is the political will to drive the objectives forward.
On the level of granularity in the 7th EAP opinions diverge: some consider the programme to be a rather generic high-level guiding tool for policy making, others think it is sufficiently detailed on actions and planning. E.g. an NGO dealing with public health suggested that the advantage of the 7th EAP is in its sufficient level of details on actions (“it gives policy makers a to-do list, outlines how to reach objectives, and is therefore a good planning tool”). This makes it more practical to follow up and monitor, as well as “use as a reminder to the EC to do their job, an opportunity for the public, society to check if they’ve completed it, and keep it accountable”. Such divergence might stem from the higher level of details in actions under objective three (namely on actions in area of chemicals and health), in comparison to the less detailed presentation of actions under objectives one and two.

5.3 Efficiency

5.3.1 To what extent has the 7th EAP created synergies or opportunities for streamlining, and cost saving at various levels?
Efficiency was noted as being a key principle that runs through the 7th EAP. It was stated by one interviewee as being perceived as the driver behind the circular economy package (first and second), particularly via its policy direction for waste and the circular economy. Another noted the synergy between the circular economy and climate policy was an efficient measure for their work. Nevertheless, they noted more work is still required in this area.

An industrial expert (who works with DG Environment; DG Internal Market, Industry, Entrepreneurship and SMEs; and DG Employment, Social Affairs & Inclusion) sees more attempts from the EC to improve synergies, and consider how legislation affects other sectors. However, they could not say this was as a result of the 7th EAP. “As an organisation we also have to look at regulations in a more comprehensive way. E.g. the Water Framework Directive: is not just about water, it forces us to look at things not from a pure water/environmental point of view. Even if it does not create savings or additional costs we are still moving towards it”.

5.3.2 To what extent has the 7th EAP been useful in identifying and addressing information needs and thus supporting efficient and effective policies?
The stakeholders felt that an updated knowledge base via monitoring, and particularly a focus on scientific studies/data is crucial for environmental policy-making. However, as two stakeholders noted the EC was likely to have used all relevant information at the time of drafting the 7th EAP. However, it is harder to state whether the EAP has assisted in the collection of new information. At the time of the creation of the programme, the contemporary (then new) information was likely to have supported efficient policies. A third interviewee noted that objective five (improving the EU’s knowledge-base) could be more targeted to have a common approach at the EU level of sharing information. This stakeholder also noted that objective five is a major influence on their work, which revolves around pushing for further development in the three thematic areas via the provision of data and updated scientific information. They noted their involvement in the European Knowledge Community and the Knowledge Innovation Partnership.

One NGO raised a point about the data collection related to the Ambient Air Quality Directive implementation: They felt that there were overly complex criteria for data collection devised by the

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7 Beyond what is written in Paragraph 73.
EC, and as a result, very little data was released on time. Therefore, they felt there was a need to enable quicker and more effective results and to strengthen the ability to report. Numerous positive local actions - be it from individual citizens or NGOs who gather data - are gaining popularity and momentum but there is a need for EU action to ensure that such actions develop homogeneously across Europe.

5.4 Relevance

5.4.1 To what extent does the 7th EAP address the challenges of EU environmental policy in a proportionate way?

It was largely considered that the 7th EAP did address the relevant challenges faced by EU environmental policy. However, the stakeholders disagreed on whether they were dealt with in a proportionate manner. One of the interviewees noted that some priorities now get more attention (as the policy debate evolves). For example, the topics of plastics and chemicals were not as ‘hot’ when the 7th EAP was drafted as they are now - but they are nevertheless still addressed within the programme. The potential improvements suggested by stakeholders are listed here:

- **Funding/investment tools**: although covered partly by objective six, some stakeholders noted a larger focus on environmental funding was crucial. For example, the LIFE funding tool was not deemed sufficient by two stakeholders for the substantial funding required to achieve all of the EU’s environmental policy objectives. One stakeholder also noted that it would not facilitate achieving the EU’s objectives in the transition to the circular economy. The same stakeholder also noted that other sources of funding, such as the European Investment Bank (EIB), should be more accountable in order to assess if the funding available from them is large enough to significantly contribute to achieving the required objectives (environmental protection). The other stakeholder stated that the 40% co-funding required under LIFE can be an obstacle for environmental NGOs whose available funds (which often come from other EU and national sources) cannot cover these amounts. They suggested increasing the EU funding rate to 100%, as this would allow more stakeholders to benefit from environmental funding. Stakeholders called for a greater use by MSs of the cohesion policy funds, EIB, and the European Regional Development Fund (ERDF). Another stakeholder noted the need for a greater focus on internalising negative externalities (even though the references in the programme to this was deemed positive). It was stated the current investment is high and the risk is significant in plastic recycling, which is why there is a relatively low percentage recycling rate. This is mainly due to the fact that virgin polymers are still extremely price competitive compared to recycled plastics.

- **Addressing policy interface issues**: Although addressed in objective seven, it was noted that many policy interfaces issues persist, in waste, chemical and product design legislation. Chemical legislation takes into account good scientific knowledge, which is also required in eco-design legislation, especially as new techniques for gluing/welding products becomes more widespread (particularly for electronic products). Chemical and waste policy does not align to allow the transition to a circular economy. If we end up reclassifying waste streams from hazardous to non-hazardous, it will have a huge impact on recyclability and end users using recycled materials. There is a need to distinguish between the properties of waste and the outputs of the materials. This should be addressed by the EAP process.
• **Implementation**: This aspect was regarded by one stakeholder as the key objective of the EAP, however it should therefore be reflected in the EAP. Legislation is going in the right direction; however, we now need to see those impacts with action on the ground.

• **Highlight negative outcomes**: Another stakeholder stated that the document should - without becoming alarmist - outline the negative trends that we currently (and objectively) see taking place. It should highlight the severity of the situation to ensure action.

### 5.4.2 How flexible is the 7th EAP approach to allow new and emerging issues to be taken into account?

The majority of the stakeholders felt that the 7th EAP does not completely address new and emerging issues, however they felt that this was not something it needed to do.

- They noted that the EC used the relevant information it had at its disposal at the time of drafting the document, which is positive; however, over time there is a need for more information in the strategy.

- They also noted that although emerging issues are mentioned in objective five, addressing emerging issues is most effectively achieved in the horizon scanning exercise before any such future initiative (i.e. for an 8th EAP). It was stated that such umbrella documents are not the only means for policy to evolve - other mechanisms are in place to allow this.

- It was also noted that any updates to the 7th EAP should not occur during the cycle of this strategy but should inform any future programme. The document was written at a certain moment and at the time, it was perceived as being well done and covered all challenges.

- Some stakeholders felt that it was sufficient to accommodate the rapid policy development in the area of circular economy, and strategies promoted under it (plastics, product design, etc.).

- Its overarching framework allows the linking up of various policy domains in an easy manner. An NGO gave an example from their experience with the Energy Performance and Buildings Directive (EPBD). Here, policy makers who were traditionally involved in mobility, were suddenly asked to address building issues. Though this may not be immediately obvious, buildings are crucial in charging vehicles and these seemingly unrelated policy domains had to be looked at jointly.

- It was suggested that the next EAP should take into consideration (or makes space for addressing) new emerging issues/challenges posed by digitisation, the sharing economy, and rebound effects from these developments.

### 5.5 Coherence

### 5.5.1 How consistent with each other are the nine priority objectives and their actions?

Most of the interviewees did not perceive any major inconsistencies between the nine priority objectives and their actions. However, there were some comments related to a need for improved coherence in policy.

- **Going beyond objective seven**: Improved coherence between the main three thematic objectives was noted as crucial. Each objective area should relate explicitly to one another and cannot depend solely upon objective seven. If it is clearly outlined how the issues are interrelated and can be tackled, then it will make implementation of the actions easier. Stakeholders also expressed the view that it should more explicitly relate to the two other EU pillars (energy and climate), this should encourage the involvement of other DGs and result in more coherence with environmental policy.

- **Addressing externalities**: A stakeholder noted the need to provide market incentives to internalise negative environmental externalities. An example being resource and energy saving
and associated emission reduction targets, into primary resource costs (particularly for virgin polymers).

5.5.2 To what extent is the 7th EAP integrated and coherent with other EU policies and strategies, including the Juncker priorities and the Europe 2020 Strategy?

For this sub-question a limited number of the stakeholders offered (a variety) of opinions on the interlinkages between various EU policies and the 7th EAP. On the whole, most of those who had an opinion outlined areas where they felt coherence needed to be improved. These areas included:

- **EC coherence**: Environmental targets need not only be coherent with each other and with current broad targets, but the EAP should also guide what other DGs achieve, e.g. linking energy policy with material resource policy.
- **Agriculture clash**: The food system puts a very significant pressure on the environment (and climate). It contributes to biodiversity loss and climate change on multiple fronts. At the same time, food production is increasingly suffering from poor ecosystems and climate change. The next Common Agricultural Policy (CAP) needs to take this into account in a fundamental way.
- **Circular economy and climate change synergy**: this was positively received by one of the stakeholders; however, they further noted more synergies are required here.
- **Juncker Priorities**: One NGO interviewee perceived the change in EC officials as a challenge for realising the 7th EAP. The role of the programme is currently under that of the priorities, but according to the stakeholder, it should be the other way around. However, to some degree this was deemed more effective than potentially having adopted it within the same political cycle, as otherwise the objectives may not have been as strong and usable for NGOs.
- **Circular economy drives through everything**: it was noted that the bio economy is often ignored, even though it directly links to the managing and reprocessing of bio waste, which links to food waste/agricultural waste, which links to water management, which links to chemical-use (pesticide) in agriculture.
- **The European Semester**: one NGO noted that the EC did not include 7th EAP actions in the scope of the European Semester, despite the knowledge and experience the EC has in steering the achievement of economic goals at the EU level.

A MS network highlighted how the 7th EAP’s coherence is loosely visible from their focus as an association. They used the programme to align their Strategic Programme for 2016-2020. The 7th EAP therefore directly relates to their key areas of work (for example from their expert teams):

- Industry and Air;
- Waste and Trans-frontier Shipment of Waste (TFS);
- Water and Land (agriculture, over-extraction of water, pesticides);
- Nature protection (habitats, the illegal killing of birds etc.); and
- Cross-cutting approaches (innovative tools, guidance materials, trainings, and “peer review” initiative).

All of these points link to objective four of the 7th EAP (better implementation), but also relate to a variety of the other key thematic and enabling objectives.

One general point was raised by some interviewees concerning silo thinking in some DGs of the EC, and this being apparent in different goals for DG Environment and other DGs. They felt that there are many
examples of DG Environment doing good work but lacking the political power to push it through other DGs and have a lasting significant impact on policies. The same stakeholders also noted that there are lots of very good initiatives from DG Environment (e.g. the green capital and green leaf awards) that look at renewable energy, but DG Energy do not appear to look at these for good practice examples, and they thus fail to take inspiration from them. As a result, DG Energy can appear to be trying to reinvent the wheel. Some stakeholders had the impression that DG Environment have been side-lined. These stakeholders pointed to budget reduction, their lack of impact on industrial policy and agricultural as evidence that DG Environment is finding it difficult to be heard and to be taken heed of. They got the impression that DG Environment are no longer invited to some internal meetings at other DGs. They felt that the political will needs to change, especially in the next EC. DG Environment must be more heard by other DGs, in order to make them more coherent with the overall aims and to go beyond silos to create a sustainable society covering many issues (biodiversity, circular economy, low carbon industry, etc.).

Some stakeholders commented that they perceived examples of incoherence, for example subsidies in energy and agriculture, which do not help address various environmental challenges. For the former, this was exemplified by the €55 billion fossil fuel subsidies present in Europe in 2016, as noted in the Commission Report “Energy prices and costs in Europe”. For agriculture, the NGO Birdlife Europe has expressed their concerns over the CAP’s lack of subsidies to protect nature and biodiversity. In a press release from February 2019, they announced their support of the EP’s Environmental Committee’s (COMENVI) vote to ensure all agricultural subsidies are conditional on protecting nature and water in the Commission’s new CAP proposal. Birdlife Europe noted that COMENVI’s announcement is a step in the right direction against the controversial proposal which they believe “as it stands now is a dramatic threat to nature and biodiversity in Europe”. Stakeholders for this study noted that such policies need to be aligned at a higher level, to ensure an end to such environmentally damaging subsidies. It should be noted that these are not seen as an example of incoherence by all or by the European Commission, but perhaps as reflecting multiple objectives.

An NGO was also concerned that there is no reference to an 8th EAP in the LIFE programme that is now being drafted. They feel that the coherence of LIFE with the objectives of the EAP is paramount, as it should ensure that priority environmental topics and challenges are addressed in LIFE, and that a sufficient and allocated budget is secured.

5.5.3 To what extent is the 7th EAP coherent with international commitments, including the 2030 Agenda and SDGs?

The stakeholders all regarded the 7th EAP and the SDGs to be coherent with one another. Nevertheless, there were some comments concerning their relationship.

- **7th EAP did not drive SDGs:** it was perceived that the EU’s involvement in the SDGs was not driven forward by the 7th EAP, but more but the high political profile they enjoyed, which engaged all the MSs in political discussions.
- **7th EAP and SDG coherence:** Some areas that stakeholders noted as being well aligned between the SDGs and EU policy were SDG 12 (responsible consumption and production) and the circular economy package.
- **EU maintains leadership:** Beyond the coherence of the two policies, several stakeholders noted that the 7th EAP outlines a more ambitious environmental policy than that envisaged by the SDGs. One stakeholder noted this was true for EU practice in general: i.e. in a United
Nations Environment Programme Finance Initiative (UNEP FI) the EU banks were noticeably much more advanced in taking the environment into consideration.

- **Explicitly use SDGs more:** It was noted that the SDGs are more high-profile with regard to the engagement of stakeholders (both within and outside the EU). It was noted as the only global policy process that one stakeholder noted people “wear on their vests”. It was suggested that the EU and any future EAP should therefore more explicitly link itself to them to utilise the strong symbolic resonance they currently hold, while maintaining EU ambition.

- There was a criticism from one stakeholder relating to biodiversity. The stakeholder argued that coherence with, and commitment to, international agreements does not guarantee results and impact. E.g., an industrial association noted that the 7th EAP is in line with the International Convention on Biodiversity and SDGs, and there is a commitment in the EU to this, but there is a lack of success in stopping biodiversity loss. This, according to the stakeholder, is because conservation issues have a lower priority in the policy agenda in comparison to economic development issues.

### 5.6 EU-added value

#### 5.6.1 What is the additional value resulting from the 7th EAP compared to what could be achieved by EU environmental policy without such a framework?

A clear majority of the stakeholders noted that "without doubt" the 7th EAP adds value beyond the normal EU environmental framework.

- **Environmental priority:** It is a rare instance where environmental protection is the priority. They felt there is a need for more of this, as immediate environmental impacts are often harder to spot than energy impacts.

- **Overall framework document:** Many agree that it provides a clear message and understanding to other stakeholders at all levels (EU, regional, local) and to other sectors within the EC and Europe. It also helps to influence international organisations and policy decisions by suggesting a framework, a coherent discourse especially for future goals to be integrated. An overarching framework is necessary in order to embody and ensure overlapping objectives such as those of mobility, energy and building. It serves both as a reminder and an enabler of the adoption of a new political mind-set tending towards adaptability and flexibility. Its overarching nature is helpful in improving coherence between different pieces and areas of legislation.

- **Coherence is pressing:** Having a coherent environmental policy, covering all sectors was deemed useful. Environmental and climate change issues are affecting business and our lives. Therefore coordinating policy via a high-level strategy such as the 7th EAP, is key. It was noted by one stakeholder as being a buffer against the complete fragmentation of environmental policy. Its acceptance by the EP and the Council provides further credibility, ownership and accountability. The 7th EAP would have added value if it also had MS ownership and accountability.

- **Coherence in implementation:** Another stakeholder noted that implementation across the EU varies in quality. Therefore, countries and politicians require guidance with documents such as this to become more harmonised.

- **Long-term vision:** The long-term vision aids in seeing where the Union should put its focus and makes the preparation of more concrete actions like the Resource Efficiency roadmap or the Circular Economy Action Plan easier. It also provides continuity in the guidance for implementation. Lastly, it provides an additional focus on transition, as to achieve such a radical
long-term vision requires radical transition. The 7th EAP should ideally be supplemented with stepping-stone objectives (2020/2030) to truly add value. One stakeholder pointed out that otherwise you end up with failures, such as with the biodiversity goals8 with the original target to stop loss by 2010 failing, and the subsequent moving of this target to 2020 also looking likely to fail.

- **Communication:** it was noted by one stakeholder that it could add additional value if the 7th EAP was communicated better so that more stakeholders were engaged with the strategy. It would also allow their deeper investment into environmental issues.

- **Common Language:** the 7th EAP was regarded as having created a common language amongst EU stakeholders which makes tackling the issues presented in the document easier to manage.

One contrary opinion was expressed. This questioned the value added of such umbrella programmes: “overall improvement in policy is not driven by the 7th EAP but by the political guidelines of the EC and the Better Regulation Guidelines. It comes from other initiatives (consultation etc.). If one looks back on proposals for waste, it was driven by the circular economy concept, not by the 7th EAP (or very minor references to it), 15-20 years ago there was a need for such an overall action programme approach. Today, it has become obsolete: its overall ideas do not follow changing political priorities. The 7th EAP as such is not driving change. It might manage to keep some concepts on the agenda, but this is usually because these concepts have become obvious (safeguarding environment and human health)”.

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8 By 2010, biodiversity loss was meant to be stopped. Now the goal is 2020, however the EEA is sceptical that this will be accomplished.
6 Conclusion (Consultation Synopsis)

6.1 Approach

The Consultation Synopsis report (see Annex I), was prepared for the EC in order to provide a summary of the consultations. This includes the results of the Open Public Consultation, targeted MS and non-MS consultations, and the two workshops. This Chapter provides a brief summary of the full consultation synopsis, as a conclusion to this report.

Stakeholder representation

The numbers of all stakeholders consulted throughout the study, per consultation activity, is presented below. No total figure has been provided, as many of the stakeholders attended several of the consultation activities. However, the figure is somewhere in the range of 153 and 276. For an in depth breakdown of consulted stakeholders please see Chapters 3-5, and Annexes G-I.

<table>
<thead>
<tr>
<th>Stakeholder consultation activity</th>
<th>Total number of participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Public Consultation (May to July 2018)</td>
<td>153</td>
</tr>
<tr>
<td>Targeted Member State Consultation (July to September 2018)</td>
<td>14</td>
</tr>
<tr>
<td>Targeted Non-Member State Consultation (August to September 2018)</td>
<td>18</td>
</tr>
<tr>
<td>Workshop 1 (21st June 2018)</td>
<td>33</td>
</tr>
<tr>
<td>Workshop 2 (13th November 2018)</td>
<td>58</td>
</tr>
</tbody>
</table>

It should be noted that despite efforts to engage a full and diverse range of stakeholders, certain groups, particularly business and civil society, did not respond to the extent that they typically do to other EC consultations. In the Open Public Consultation business and industry stakeholders accounted for 11% of the 153 stakeholders. Of the 18 targeted non-MS consultations, only one stakeholder categorised themselves as a “business representative”. However, there were two “industry associations”, and a “bank”, which can be considered private sector feedback. This trend was also apparent at the second workshop, where participants were asked if they represented industry/business and only one stakeholder raised their hand. The main reason for this is that the 7th EAP has less of a direct influence on the work of businesses and industry stakeholders than other more specific environmental legislation. This aligns with the finding that the 7th EAP is more effective at generating action from public authorities and providing NGOs and interest groups with a means of holding the EC to account for its actions, than in directly inspiring business action.

6.2 Effectiveness

Overall, the consultation process identified that the 7th EAP is perceived to be an effective high-level strategy for promoting environmental issues at an EU level. There were three main points of discussion touched upon by stakeholders. The first was the 7th EAP as a high-level strategy for environmental EU

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9 Public authorities similarly made up only 10% of stakeholder for the Open Public Consultation. Nevertheless, they made up a greater share of the other stakeholder consultation activities, with 14 out of 28 being directly consulted during the Member State interviews and focus groups. Furthermore, the consulted public authorities had a closer affiliation with the programme than business/industry representatives.
guidance; the second was the programme as a tool for EU accountability and predictability; and thirdly that not all stakeholders are equally engaged by the programme.

High-level Strategy
As a high-level strategy, it was noted that the 7th EAP influences broad environmental EU trends (such as the drive towards the circular economy). It was also noted that its difficult to attribute such a high-level strategy to effective on the ground action at a MS level, or even citations of the 7th EAP manifest in national strategies. MS stakeholders outlined examples of the programme influencing national strategies. Examples included Bulgaria’s 2020 National Development Programme, Italy’s Collegato Ambientale, Poland’s National Ecological Policy 2030. One stakeholder outlined that the programme did not necessarily align EU environmental policy. However, it did seem to be contributing towards the alignment of MS national environment ministries and their objectives. The thematic area where the 7th EAP was perceived as most effective as a high-level strategy was in resource efficiency. This was followed by a focus on natural capital and on sustainability in cities.

Accountability and predictability
Arguably, the area which stakeholders perceived the 7th EAP to be most effective was as a tool for accountability and predictability. It provides a ‘to-do-list’ for EU policy-makers, particularly the EC, on their future objectives. Stakeholders noted that this predictability is most often utilised by (and is effective for) NGOs and the EP as an accountability tool. It was stated that effectiveness could be increased if more roadmaps and/or targets were provided for a variety of EU actors. Stronger ownership across the different policy-makers (i.e. EC, EP, Council) was also suggested as a potential improvement. Both of these would ensure that there are more actions and policy-makers accountable for a prolonged period, which would ensure a more effective environmental policy-cycle in line with the objectives of the EAP.

Engage more stakeholders
An area of the 7th EAP that stakeholders noted as less effective was in engaging a broad variety of stakeholders. In theory the 7th EAP should provide all stakeholders with a “predictable framework for action”. Nevertheless, it is clear that individual citizens, businesses and local authorities are not as engaged by the 7th EAP as EU, MS, or NGO actors. This reflects the fact that these latter groups were the initial target for the 7th EAP. It was believed that in order to improve engagement with the programme, such stakeholders need to be more explicitly targeted by it. This could be achieved by reformatting the document to make it more accessible, and/or by introducing a more effective communication strategy to better engage these stakeholders with the 7th EAPs objectives. Local authorities noted that they interact more with the national level, which being connected with the 7th EAP framework, provides some local engagement indirectly with the programme. However, there is little evidence of this.

6.3 Efficiency

The question of efficiency was more difficult to cover than the other questions in this evaluation. This evaluation criteria typically focuses on costs and benefits. As a high-level strategy it is difficult to quantify the benefits of the 7th EAP. Therefore, the evaluation focused on the 7th EAP’s influence on efficient policy making. This is of most relevance to the 7th EAP’s priority objectives of providing better
information (objective five) and ensuring environmental mainstreaming/integration of policy (objective seven) as positive focuses for cost saving.

**Saved costs**

Improving our knowledge of the environment and the better mainstreaming of environmental issues into all policy were viewed as efficiency benefits promoted by the 7th EAP. The former provides a better foundation in order to build more accurate and effective policies for environmental action, therefore saving costs on ineffective alternatives. It also facilitates transparency on environmental issues, allowing the public to be a more effective actor for environmentally positive actions. One stakeholder noted that objective five could be improved if it better targeted a common sharing approach to information. Mainstreaming more directly ensures that fewer policies have to be implemented solely for environmental concerns. Stakeholders broadly perceived the EU to be aiming for improved policy synergy, however they noted it was difficult to quantify how much of an effect the 7th EAP has had on this. Some MS stakeholders had a mixed reaction on the extent to which the programme has led to synergies and cost savings.

**More implementation required**

There were some stakeholders that regarded the 7th EAP’s focus on implementation (objective four) as not doing enough to promote efficient policy implementation. They noted that there is an ever growing acquis related to addressing environmental challenges, however some of it is not being fully or efficiently implemented. Therefore, they believed the 7th EAP should increase its focus on EU financial tools as these can help facilitate more implementation of the environmental acquis.

### 6.4 Coherence

The stakeholders considered the 7th EAP to be internally coherent. It was stated that this could be improved. For example, it should not be left to objective seven (integration and coherence) to ensure coherence; it could be more explicit within the thematic priority objectives (objectives one to three). The perceived coherence of the 7th EAP was discussed on three levels: EU policy/strategy coherence, inter-MS coherence, and international coherence.

**EU level**

It was noted that there are areas where there are potential trade-offs within the EU policy landscape. The Water Framework Directive, and the Renewable Energy Directive were both provided as examples. Stakeholders called for improved coherence via a greater explicit inclusion of the 7th EAP and environmental issues in EU financial documents’ targets and funding criteria (e.g. MFF, European Semester). They also stated that all financing across the EU should follow clear environmental criteria, adhering to good governance and a scientific basis. A study\(^\text{10}\) from COWI and Milieu has highlighted how environmental concerns have been more coherently integrated into Cohesion Policy Funds. The funds have grown from €41 billion in the 2000-2006 period to €82 billion in the 2014-2020 period. The study also showed that environmental allocations have increased as a total percentage of Cohesion Fund resources (from 25% to almost 32% in the same period). Beyond this, a MS network association used the 7th EAP to create their Strategic Programme for 2016-2020. They felt that this provided a clear example of the programme generating environmental coherence related to implementation. Stakeholders noted

that there was discussion of some EU strategies (Juncker Priorities and Europe2020) as taking the spotlight from the 7th EAP. This can overshadow the EAP and diminish its effectiveness.

**Member State level**

There were a mixture of reactions at MS level, however several outlined synergies between the 7th EAP and other policies. The Czech Republic, Estonia, and Italy perceived the programme as stimulating interaction between different national policies. The UK identified the 7th EAP as stimulating coherence at a local level (cities) through its influence on local (but EU inspired) action, such as the Covenant of Mayors. There was some difficulties reported by some MSs in integrating environmental issues more coherently into national policy. This was suggested as showing that the focus on coherence still remains pertinent at a MS level, and should still be pushed by the EU.

**International level**

The 7th EAP’s coherence with international initiatives, such as the SDGs and the Paris Agreement, was brought up. No major incoherence was noted between the programme and EU international agreements. It was emphasised that the SDGs (as the more recognised strategy) could be better incorporated within the 7th EAP. Some noted that SDG12 (responsible consumption and production) in particular, should be clearly supported by EU strategy. A small number of stakeholders felt that the programme could be more coherent on issues of cooperation with neighbouring and third countries. This was deemed pivotal for driving social and climate equality internationally.

### 6.5 Relevance

A clear majority of stakeholders agreed that the 7th EAP is a relevant document for the environmental challenges currently faced by Europe. The main thematic objectives were still thought to be relevant areas that need action. This was partly due to the broad nature of the programme which allows it to address long-term issues. There were suggestions on increasing the relevance of the programme. This included focusing more on funding instruments such as the cohesion policy funds, EIB, and ERDF in the EAP. Moving beyond objective seven’s focus on integration to addressing policy-interface issues with systemic logic (particularly for chemical, waste, and health policy). A better system of implementation was considered more important than it appears in the 7th EAP. Stakeholders outlined that legislation is heading in a positive direction, but an increase in action on the ground is necessary. It was even regarded by one stakeholder as being the most relevant objective in the programme and should be clearly expressed as such. It was also stated that the programmes relevance could be increased via a better internal and external communication of the programme. Internally this means communicating more effectively within the programme to better engage and mobilise all stakeholders (especially private citizens and businesses). Externally this would include a better communication strategy to keep the programme in the public eye throughout its lifespan. This would ensure that it retains its relevance for guiding EU environment policy for longer. This may also be achieved by aligning it with the SDGs. Finally, stakeholders outlined that some emerging issues should possibly change the priorities. For example, chemicals and plastics, are now more politically relevant than they were in 2014. However, some believed the broad overarching nature of the programme captured these issues sufficiently well.
6.6 EU-added value

Almost all stakeholders agreed that the 7th EAP provides a degree of EU-added value. It was outlined as the only EU strategy that priorities the environment. This provides much value in regard to environmental issues and was regarded as increasing the EU’s level of ambition. This was particularly the case with the long-term vision, which is regarded as effectively capturing the hearts and minds of EU actors to push for more environmental reform. MSs outlined how the programme adds value in setting their environmental ministries’ priorities. The two main areas where the 7th EAP was felt to provide EU-added value, were as a tool for communication, and in providing some EU coherence.

**Tool for dialogue and communication**

The 7th EAP was seen as adding value through its use as a tool for dialogue and communication. For many it provides a common language to allow all EU actors tackle environmental challenges cooperatively. One public institution highlighted that the 7th EAP was used as their tool for engaging the interest of stakeholders on environmental stakeholders. MSs outlined that it generated more dialogue between EU nations and generally raised awareness. It was noted that this could be improved with a stronger communication strategy to increase the lifespan of the programme, and by engaging more EU actors (i.e. citizens and businesses).

**Coherence at an EU level**

Stakeholders regarded the coherence generated by the 7th EAP as added value that would be absent without such a pan-EU strategy. Such coordinated policy responses were regarded as ever more necessary at an international level. The 7th EAP can therefore be viewed as a tool to express the agreed priorities across the EU. It was regarded as having assisted the promotion of implementation through its drive for the EIR, and the influence this had on MSs sharing best practices.

6.7 A future EAP

Although it is beyond the scope of an evaluation several stakeholders reported their support for an 8th EAP, which reflects the added value provided by the 7th EAP. Several suggestions were made as to how the 7th EAP could be improved. Suggestions cut across the various evaluation criteria. The first was the explicit inclusion of the SDGs within a future EAP to make the document more internationally accessible. Secondly, a better engagement of all stakeholders (including private citizens and businesses) should be sought. This could be achieved via making the EAP more readable for those audiences, or through promoting the programme more effectively in all EU communications. Thirdly, the document could be made more concise to improve accessibility. It was suggested that a three page document would work well. Finally, it was recommended by some that the strategy should incorporate more elements of actions, objectives, and concrete targets. This would provide added value for the evaluation and monitoring of the programme’s impact. Some believed the broad overarching nature of the document provides more added-value.

6.8 Key Conclusions

Based on the synopsis of the consultations provided in this section, the following specific key conclusions can be drawn:

- Stakeholders strongly support having an EAP. They see the 7th EAP as helping to provide more predictable, faster and better co-ordinated actions and so also improving the efficiency of
policies. However, predictability may have been reduced after the change of a European Commission, with new political priorities;

- There was broad buy-in from stakeholders on the structure and content of the 7th EAP, whilst it was also felt that the actions were too detailed / complex;
- Value added would have been increased by a better mechanism for ensuring ownership and full delivery of commitments.
Annex A: Questionnaire Open Public Consultation

Public Consultation on the Evaluation of the 7th Environment Action Programme (7th EAP)

Fields marked with * are mandatory.

Living well, within the limits of our planet
7th Environment Action Programme

Introduction

Environment Action Programmes have guided the development of EU environment policy since the 1970s, and each programme has been assessed to see if the objectives were met. The 7th Environment Action Programme (7th EAP) is a framework for EU environmental policy-making to guide action up to and beyond 2020. It was adopted by the European Parliament and the Council of the EU at the end of 2013, taking into account the views of civil society and citizens. Its general objective is to improve the state of the EU’s environment and citizens’ wellbeing, whilst contributing to the EU’s broader objectives of smart, sustainable and inclusive growth.

The 7th EAP identifies three key thematic objectives:

- to protect, conserve and enhance the Union’s natural capital – from fertile soil, productive land and seas to fresh water and clean air – as well as the biodiversity that supports it.
- to turn the Union into a resource-efficient, green, and competitive low-carbon economy – from delivering of the 2020 climate targets to improving the environmental compatibility to reducing the environmental impact of consumption.
- to safeguard the Union’s citizens from environment-related pressures and risks to health and wellbeing like air and water pollution, excessive noise, and toxic chemicals.
Four so-called "enablers" will help Europe deliver on these goals:

- better implementation of legislation
- better information by improving the knowledge base
- more and wiser investment for environment and climate policy
- full integration of environmental requirements and considerations into other policies

Two additional horizontal priority objectives complete the programme:

- to make the Union’s cities more sustainable
- to help the Union address international environmental and climate challenges more effectively.

The programme entered into force in January 2014.

If you are looking for more information on the 7th EAP, click here for a summary and for the Evaluation Roadmap.

I. Background information about the respondent

* 

1. Are you replying to this questionnaire as/on behalf of:
   - a private individual
   - an association of citizens
   - a non-governmental organisation
   - a business or business representative
   - a public authority
   - an European Institution or Agency
   - an academic/research institute
   - other

   Please specify
   50 character(s) maximum

* 

Are you representing
   - a business association
   - a microenterprise (under 10 employees)
a small enterprise (10-50 employees)
a SME (50-250 employees)
a large company (250 or more employees)

Are you representing
- an association representing public authorities
- National authority
- National parliament
- Regional authority
- Local authority

2. Please provide us with your full name if replying as an individual, otherwise give the name of your organisation

50 character(s) maximum

3. Please provide us with your email address

4.1. If your organisation is registered in the Transparency Register, please provide your Register ID number:

4.2. If your organisation is not registered, you have the opportunity to register now.
In the interests of transparency, organisations, networks, platforms or self-employed individuals engaged in activities aimed at influencing the EU decision making process have been invited to provide the public with relevant information about themselves, by registering in Transparency Register and subscribing to its Code of Conduct.
Please note: If the organisation is not registered, the submission will be published separately from the registered organisations. During the analysis of replies to a consultation, contributions from respondents who choose not to register will be treated as individual contributions (unless the contributors are recognised as representative stakeholders through Treaty provisions, European Social Dialogue, Art. 154-155 TFEU).

5. What is the main subject of your work?
- Nature and biodiversity
- Water
- Waste
- Soil
- Chemicals
Service contract to support the evaluation of the 7th Environment Action Programme - Final Report

- Management of natural resources
- Energy efficiency
- Climate change
- Air quality
- Noise
- Health
- Environmental governance
- Sustainability
- Other

* Please specify

50 character(s) maximum

* 6. In which country is your organisation (are you) located?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
* 7. Please indicate below if you want your contribution to remain anonymous

Please find on the homepage of this survey the specific privacy statement regarding how your personal data is protected. Please note that regardless of the option chosen your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication.

I give permission for my contribution to be published with my personal information: I consent the publication of all information in my contribution in whole or in part including my name or my organisation’s name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

My contribution can be published provided that I remain anonymous: I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

6. How do you rate your knowledge about environmental and climate policy?

<table>
<thead>
<tr>
<th></th>
<th>Comprehensive</th>
<th>High</th>
<th>Limited</th>
<th>Very limited</th>
<th>No knowledge</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>In your region</td>
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<td>In your country</td>
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<tr>
<td>In the European Union</td>
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<tr>
<td>Worldwide</td>
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9. How familiar are you with the 7th Environment Action Programme (EAP)?

- I do not know about the 7th EAP
- I have heard about the 7th EAP in general
- I am familiar with the main aspects of the 7th EAP
- I am very familiar with the 7th EAP

10. Did you or your organisation contribute to the development of the 7th EAP (for example, as part of the public consultation or discussion)?

- Yes
- No

II. General Questions
In this part of the questionnaire we ask some general questions aimed at the wider public. We would like to know if in your opinion the general aims of the 7th EAP have been met, if its focus was set correctly and if the decision-making process was adequate.

11. The 7th EAP provides three key thematic objectives (see Introduction) and was guided by a long-term vision: “In 2050, we live well, within the planet’s ecological limits. Our prosperity and healthy environment stem from an innovative, circular economy where nothing is wasted and where natural resources are managed sustainably, and biodiversity is protected, valued and restored in ways that enhance our society’s resilience. Our low-carbon growth has long been decoupled from resource use, setting the pace for a safe and sustainable global society.”

To what extent do you agree with the following statements:

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>A long-term vision is important to steer environment and climate policy</td>
<td></td>
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<tr>
<td>The vision of the 7th EAP has the right focus</td>
<td></td>
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<tr>
<td>The three thematic objectives address the right challenges for the environment and climate policy</td>
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</table>

12. In your opinion, are there important environment and climate challenges that have not been addressed by the 7th EAP?

- Yes
- No

Please specify

300 character(s) maximum

13. Have you seen new actions on the following subjects related to environment protection in your country, region or city since the 7th EAP entered into force in 2014?

<table>
<thead>
<tr>
<th>Yes, many</th>
<th>Yes, some</th>
<th>No</th>
<th>Do not know</th>
</tr>
</thead>
</table>
### Climate protection
- Conservation of the variety of plant and animal life
- Soil protection
- Reducing the pollution of waters
- Reducing the pollution of the air
- Combating noise pollution
- Improving protection against toxic chemicals
- Waste prevention
- Increasing the eco-friendliness of consumer products

### 14. In your opinion, which of the following aspects of the 7th EAP are important success factors:

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Very important</th>
<th>Important</th>
<th>More or less important</th>
<th>Not very important</th>
<th>Not important</th>
<th>I do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The specific objectives</td>
<td>☒</td>
<td>☒</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The specific actions</td>
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<tr>
<td>The 7th EAP was developed in consultation with stakeholders</td>
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<tr>
<td>The 7th EAP was agreed with the European Parliament</td>
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<tr>
<td>The 7th EAP was agreed with Member States</td>
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<tr>
<td>The 7th EAP envisages a shared responsibility between the EU and Member States</td>
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### 15. One objective of the 7th EAP was to help cities become more sustainable. In your opinion, has your city taken further actions to become more sustainable?

- Yes, many
- Yes, a few
- No
- I don't know
16. Overall, do you consider that it is useful to have the 7th EAP?

- Very useful
- Useful
- More or less useful
- Not very useful
- Not useful
- I don’t know

III. In-depth questions

In this section we ask you to share a more in-depth view of the 7th EAP. To answer the questions properly it would be useful that you are familiar with the 7th EAP. You are invited to answer every question. In case you are not familiar with some aspects, please choose “I do not know”.

17. Do you agree with the following statements?

<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know</th>
</tr>
</thead>
<tbody>
<tr>
<td>The 7th EAP makes EU environmental and climate policy more predictable</td>
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<tr>
<td>The 7th EAP helps to make the environmental and climate actions of the EU and its Member States better coordinated</td>
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<tr>
<td>The 7th EAP contributes to better implementation of EU environmental and climate legislation</td>
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<tr>
<td>The 7th EAP improves the conditions for investments into eco-friendly products</td>
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<tr>
<td>The 7th EAP promotes eco-innovation</td>
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<tr>
<td>The 7th EAP helps integrate environment and climate concerns into other policy areas</td>
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<td>The 7th EAP leads to participation of civil society in the subsequent development and</td>
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</table>
18. In 2010 the EU adopted a long-term strategy to advance the economy of the European Union, the Europe 2020 strategy aiming to turn the EU into a smart, sustainable and inclusive economy. In your view, did the 7th EAP contribute to achieving the objectives of Europe 2020?

- Yes
- Partly
- No
- I do not know

19. The international community agreed on the Sustainable Development Goals and the Paris Agreement on climate protection in 2015. In your opinion, is the 7th EAP coherent with these?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>More or Less</th>
<th>No</th>
<th>I do not know</th>
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</thead>
<tbody>
<tr>
<td>Sustainable Development Goals</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Paris Agreement</td>
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20. In your opinion, what features of the 7th EAP have proved to be the most successful and what could have provided more added value?

1000 characters maximum

Do you also want to send us a written statement related to the 7th EAP Evaluation? Please upload it here.

The maximum file size is 1 MB.
Annex B: MS interview topic guide and other stakeholder topic guide

Targeted Stakeholder Consultation - Member State Questionnaire

Questions to Member State Representatives for the Evaluation of the 7th EAP
Please either contact Trinomics to schedule an interview date to go through these questions or reply in writing by the end of July 2018.

Section A: Background information
1. Please provide us with your full name, address, country, organisation.
2. Please indicate if you want your contribution to remain anonymous.

Section B: Effectiveness
3. In your opinion, at which governance level(s) (EU, national, regional, local, none) has the 7th EAP been useful in helping to address environmental concerns?
4. How has the 7th EAP influenced your national environment and climate policy-making?
5. Can you name any specific national policy/strategy that was influenced by the 7th EAP?
6. Can you describe the nature of this influence? For example:
   • Direct influence - without the 7th EAP actions would not have occurred;
   • 7th EAP was mentioned (during the formulation of the strategy / policy) as containing specific or general requirements on this issue;
   • 7th EAP related monitoring (e.g. EEA reporting or the ENV MS reports) highlighted a need to act.
7. Have there been any specific actions that have derived from the 7th EAP?
8. Has the EAP helped to better implement EU env and climate-law?
9. Has the EAP made the decision-making-process for environmental and climate-legislation more effective?

Section C: Efficiency:
10. Was the 7th EAP useful in achieving the following: Synergies between policy/initiatives/actions (in terms of the cost / efficiency of implementing them). Streamlining between these actions?

Section D: Relevance
11. Do you think that the 7th EAP has been useful for me/ my institution as a strategic document?

Section F: Added value
12. Do you think it has been beneficial to have the 7th EAP? (as opposed to just having your own MS objectives).
13. Has the EAP helped to develop a shared understanding about environmental and climate-policy-challenges between your Member State and the EU Institutions?
Overall progress and observations:

- Have you seen new initiatives/actions in your organisations, company, community/civil society, industrial sector since the 7th EAP entered into force in 2014? If yes, provide examples.
- Do you have an example of actions where you believe that the 7th EAP gave an extra push and helped to achieve results on the ground?
- Do you have any organisational, industrial, strategic documents that explicitly refers to the 7th EAP or its objectives. Please give a full reference and link to it.
- How did these actions help in progressing towards the thematic and horizontal objectives of the 7th EAP (Conservation, Green Economy, Environmental Health, Sustainable cities, International environmental challenges)?
- What worked and what did not?
- In your opinion, are we on track for 2050 (given the long terms objectives quoted in the 7th EAP)?

<table>
<thead>
<tr>
<th>1. Effectiveness</th>
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<tbody>
<tr>
<td><strong>Evaluation questions:</strong></td>
</tr>
<tr>
<td>1.1. To what extent has the 7th EAP enabled more predictable, faster and better coordinated actions by the EU and the Member States?</td>
</tr>
<tr>
<td>1.2. To what extent has the 7th EAP been useful in engaging different stakeholders?</td>
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<tr>
<td>1.3. How has the 7th EAP structure contributed towards achieving its nine priority objectives?</td>
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<table>
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<tr>
<th>2. Efficiency:</th>
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<tbody>
<tr>
<td><strong>Evaluation questions:</strong></td>
</tr>
<tr>
<td>2.1. To what extent has the 7th EAP created synergies or opportunities for streamlining, and cost saving at various levels?</td>
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<tr>
<td>2.2. To what extent has the 7th EAP been useful in identifying and addressing information needs and thus supporting efficient and effective policies?</td>
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<tr>
<th>3. Relevance:</th>
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<tbody>
<tr>
<td><strong>Evaluation questions:</strong></td>
</tr>
<tr>
<td>3.1. To what extent does the 7th EAP address the challenges of EU environmental policy in a proportionate way?</td>
</tr>
<tr>
<td>3.2. How flexible is the 7th EAP approach to allow new and emerging issues to be taken into account?</td>
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<thead>
<tr>
<th>4. Coherence:</th>
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<tbody>
<tr>
<td><strong>Evaluation questions:</strong></td>
</tr>
<tr>
<td>4.1. How consistent with each other are the nine priority objectives and their actions?</td>
</tr>
<tr>
<td>4.2. To what extent is the 7th EAP integrated and coherent with other EU policies and strategies, including the Juncker priorities and the Europe 2020 Strategy?</td>
</tr>
<tr>
<td>4.3. To what extent is the 7th EAP coherent with international commitments, including the 2030 Agenda and SDGs?</td>
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<th>5. Added value:</th>
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<tr>
<td><strong>Evaluation questions:</strong></td>
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<tr>
<td>5.1. What is the additional value resulting from the 7th EAP compared to what could be achieved by EU environmental policy without such a framework?</td>
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Annex C: Issue-Specific Papers (*Attached Document*)

The five issue-specific papers are provided in the attached document.
Annex D: Evaluation Matrix

Basic evaluation matrix

<table>
<thead>
<tr>
<th>Evaluation questions</th>
<th>Examples specific (sub)questions</th>
<th>Methods</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effectiveness</strong></td>
<td></td>
<td></td>
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</tbody>
</table>
| To what extent has the 7th EAP enabled more predictable, faster and better co-ordinated actions by the EU and the Member States? | • How strongly does the 7th EAP influence environmental and climate policy-making at EU and MS level?  
• Does the 7th EAP represent a sufficiently clear long-term vision for the development of policies in the field of environment and climate change?  
• Has the 7th EAP triggered actions at EU and MS level which would have not been taken otherwise and would the EU institutions and MSs have achieved better results without the strategic guidance of the 7th EAP? | • MS survey  
• Stakeholder interviews  
• MS interviews |
| To what extent has the 7th EAP been useful in engaging different stakeholders? | • As an overarching strategy for EU and MS environmental/climate policy, what functions has the 7th EAP played for the involved actors? | • MS survey  
• Stakeholder interviews  
• Public consultation |
| How has the 7th EAP structure contributed towards achieving its nine priority objectives? | • Is the current structure of three thematic, four horizontal objectives, one place-based objective and one targeted at international interventions suitable and clear?  
• Is some major objective of any type missing? | • MS survey  
• Public consultation |
| **Efficiency**        |                                  |         |
| To what extent has the 7th EAP created synergies or opportunities for streamlining, and cost saving at various levels? | • Could the results achieved so far under this objective be achieved with less costs/resources?  
• Has the objective on integrating environmental concerns into other policy areas led to cost savings? | Survey with MSs  
• MS focus Groups  
• MS survey  
• Interviews with authorities e.g. European Commission, European Parliament and EEA |
| To what extent has the 7th EAP been useful in identifying and addressing information needs and thus supporting efficient and effective policies? | • Has the 7th EAP led to better understanding of the themes and sub-themes within the different objectives?  
• Is there an area within the 7th EAP which has been understudied and where evidence is missing? | Interviews with authorities e.g. European Commission, European Parliament and EEA |
| **Relevance**         |                                  |         |
| To what extent does the 7th EAP address the challenges of EU environmental policy in a proportionate way? | • Do the objectives and sub objectives of the 7th EAP remain relevant to real needs of environmental policy?  
• Is there an (sub-)objective which is present in a | Stakeholder interviews  
• MS survey  
• MS interviews  
• MS focus groups |
<table>
<thead>
<tr>
<th>Evaluation questions</th>
<th>Examples specific (sub)questions</th>
<th>Methods</th>
</tr>
</thead>
</table>
| How flexible is the 7th EAP approach to allow new and emerging issues to be taken into account? | • Do you think that new emerging issues can be easily incorporated in the current structure of the 7th EAP or some change is needed?  
• Politically, would it be easy to incorporate new emerging issues in the 7th EAP? | • MS survey  
• MS interviews  
• MS focus groups |

**Coherence**

| How consistent with each other are the nine priority objectives and their actions? | • Do the nine priority objectives and actions complement each other?  
• Are there any sub-objective or action which contradicts others? | • Targeted interviews  
• Issue papers |
| To what extent is the 7th EAP integrated and coherent with other EU policies and strategies, including the Juncker priorities and the Europe 2020 Strategy? | • Do you think that sectorial policies at EU and Member State level have been developed and implemented in a way that supports (or are coherent with) the nine priority objectives? | • Targeted interviews  
• Issue papers |
| To what extent is the 7th EAP coherent with international commitments, including the 2030 Agenda and SDGs? | • Which (sub-)objectives need to be aligned with the SDGs? (non-existent at the time of 7th EAP drafting) | • Targeted interviews  
• Issue papers |

**Added value**

| What is the additional value resulting from the 7th EAP compared to what could be achieved by EU environmental policy without such a framework? | • What is the added value of a ‘grand strategy’ environmental policy, such as the 7th EAP?  
• Has the 7th EAP stimulated countries lagging behind in terms of environmental policy? | • MS survey  
• MS Focus Groups  
• Interviews  
• Public Consultation |
Annex E: Member State Interview Minutes (Attached Document)

The minutes from all interviews / focus groups with Member State representatives can be found in PDF format in the attached documents. The document also contains the notes structured against the evaluation criteria and questions.
Annex F: Non-Member State Interview Minutes (Attached Document)

The minutes from all interviews

The synopsis of the Open Public Consultation results can be found in PDF format in the attached documents.
Annex H: Workshop Reports *(Attached Documents)*

The completed workshop summary reports for both workshops can be found in PDF format in the attached documents.
Annex I: Consultation Synopsis Report (Attached Documents)

The Consultation Synopsis report, which outlines all of the views presented from the various consultation strategies, can be found in PDF format in the attached documents.