

Chapter VI

Guidelines on evaluation (including fitness checks)

Key requirements

- Evaluations aim to inform policymaking by assessing existing interventions regularly and ensuring that relevant evidence is available to support the preparation of new initiatives ("evaluate first" principle). Specific guidance exists for evaluations undertaken in parallel with impact assessments ("back-to-back").
- All evaluations must have a planning entry in Decide and must be steered by an interservice steering group (ISG) including a member of the lead DG's evaluation function or unit. Representatives from relevant DGs and the Secretariat-General must be invited to the ISG.
- An evaluation roadmap summarising the context, purpose and scope of the upcoming evaluation and outlining the expected approach must be published for all evaluations. Stakeholders must be able to provide feedback on the roadmap, which the lead DG must assess.
- All evaluations must follow a clearly defined, robust methodology intended to produce objective findings.
- A consultation strategy must be published for all evaluations which includes a mandatory 12 week public consultation covering the main elements of the evaluation.
- As a minimum, evaluations must assess effectiveness, efficiency, relevance, coherence and EU added value or explain why this is not done. Assessment of efficiency should always aim to quantify regulatory costs and benefits and identify burdensome or complex aspects of legislation and its implementation.
- All evaluations must assess all significant economic, social and environmental impacts of EU interventions (with particular emphasis on those identified in a previous IA) or explain why an exception has been made.
- The evaluation process, evidence base, analysis and findings must be presented in a staff working document, using a specific template.
- Evaluation conclusions must pinpoint the lessons learned thereby providing input to future policy development.
- The following files related to the evaluation must be published centrally:
 - (1) The evaluation roadmap;
 - (2) (if applicable) Terms of reference, final deliverables from contractors;
 - (3) The staff working document and an executive summary (in French, German and English) where these are required;
 - (4) The Regulatory Scrutiny Board opinion (if applicable).
- At the end of an evaluation, appropriate follow-up actions must be identified and fed into the decision-making cycle.

1. INTRODUCTION

Who should read these Guidelines?

All officials involved in the preparation of an evaluation or a fitness check should read these guidelines⁷⁷ including officials and managers in the evaluation function of the lead DG.

These Guidelines apply to evaluations (i.e. fitness checks, final, ex-post and interim evaluations) of EU policies, programmes and legislation including those governed by the Financial Regulation and its Implementing Rules.

Certain activities will not generally require an evaluation according to the approach set out in these Guidelines. These activities include:

- Individual projects, groups of projects or sub-activities where their findings will feed into an overarching evaluation. This is particularly relevant for (spending) programmes where there may be many projects or sub-activities that require some degree of assessment that has a narrower scope than evaluation as defined here. It is also the case for external programmes where findings coming from evaluations of country programmes, specific delivery methods/tools or elements of certain themes feed into larger or overarching evaluations including legal instruments;
- Evaluating an agency where aspects of the agency's performance will be evaluated together with the associated programme (executive agencies) or policy;
- A limited set of actions within an EU intervention which are not expected to lead to changes to the wider intervention e.g. a Directive which contains a clause requesting the Commission to evaluate/review/assess the definition of XX after one year and decide if it is appropriate;
- Performance at an early point in the implementation of an intervention, when information on the longer term changes (results and impacts) is not yet available;
- The internal administrative policies of the Commission (translation, interpretation, human resources and security, the Publications Office and certain areas of Eurostat).

However, this chapter still provides useful information to guide a more proportionate assessment of such activities.

Practically, a separate Decide entry and staff working document would not be required. The consultation strategy and evaluation criteria would normally cover a narrower scope.

Where a Directorate-General has doubts about the degree of application and the steps which should be followed, they should discuss the approach with the Secretariat-General, preferably during the annual discussions establishing the evaluation plan.

⁷⁷ The Guidelines set out the key requirements and obligations for evaluation and replace the previous (2004) guidelines and (2007) standards.

What is evaluation?

Evaluation is an **evidence-based judgement** of the extent to which an existing intervention is:

- **Effective;**
- **Efficient;**
- **Relevant** given the current needs;
- **Coherent** both internally and with other EU interventions; and
- Has achieved **EU added value**.

Evaluation is a tool to help the Commission learn about the functioning of EU interventions and to assess their actual performance compared to initial expectations. By evaluating, the Commission takes a critical look at whether EU activities are fit for purpose and deliver their intended objectives at minimum cost (i.e. avoiding unnecessary costs or burdens). Evaluation also provides a key opportunity to engage stakeholders and the general public.

Evaluation goes beyond an assessment of *what* has happened; it considers *why* something has occurred (the role of the EU intervention) **and, if possible, *how much* has changed as a consequence. It should look at the wider perspective and provide an independent and objective judgement of the situation based on the evidence available.**

Evaluation *looks for evidence of causality* – i.e. did the intervention (help) bring about the expected changes or were there other unintended or unexpected changes? Beyond listing outputs and describing changes, evaluations should investigate any links between the observed changes and the EU intervention. Generally, evaluations should be carried out only after sufficient time has passed to allow for changes to be identified and/or measured.

An evaluation should also assess the strength of the evidence obtained, and the implications for the robustness of the conclusions reached. Although there are many useful activities which may cover some of the elements of an evaluation (e.g. reports, implementing reports, monitoring exercises, audits, and studies including cumulative cost assessments) it is unlikely that any of these sources will on their own address all of necessary issues in order to qualify as an evaluation.

What is a fitness check?

Traditionally, Commission evaluations have been conducted on individual interventions, but the increased focus on performance has led to the creation of a new type of evaluation - the *fitness check*⁷⁸.

A *fitness check* is an evaluation of a group of interventions which have some relationship with each other (normally a common set of objectives), justifying a joint analysis.

⁷⁸ The concept of a fitness check was introduced in COM (2010) 543 final – Smart Regulation in the European Union

A fitness check assesses whether the group of interventions⁷⁹ is fit for purpose by assessing the performance of the relevant framework with respect to its policy objectives. A fitness check should pay particular attention to identifying and trying to quantify any synergies (e.g. improved performance, simplification, lower costs, reduced burdens) or inefficiencies (e.g. excessive burdens, overlaps, gaps, inconsistencies, implementation problems and/or obsolete measures) within the group of interventions which may have appeared over time, and help to identify the cumulative impact of the interventions, covering both costs and benefits.

The evaluation of individual interventions and fitness checks of policy areas are complementary and mutually reinforcing tools. While evaluations of individual interventions can provide more details on particular elements, they do not always show the full picture and a more strategic and global view is often required. Fitness checks can group together into one exercise evaluations that would otherwise have been undertaken separately, and potentially less coherently. Their particular strength is in addressing the cumulative effects of the applicable framework - these are not addressed by evaluations of individual interventions and the cumulative effects do not necessarily correspond to the sum of effects identified through such individual evaluations. Fitness checks can provide economies of scale and place a greater focus on overall objectives and performance.

Why do we evaluate?

Evaluation at the Commission serves several purposes. Although the importance may differ, most evaluation results will contribute to:

- **Timely and relevant advice to decision-making and input to political priority-setting:** Evaluation supports decision-making, contributing to strategic planning and to the design of future interventions. The Commission applies the "**evaluate first**" principle to make sure any policy decisions take into due account the lessons from past EU action. Thus for instance, lessons learned from evaluation should be available and feed into impact assessment work from the outset.
- **Organisational learning:** The results of an evaluation can be used to improve the quality of an on-going intervention. Evaluations should identify not just areas for improvement but also encourage the sharing of (good and bad) practices and achievements. Evaluation also provides the opportunity to look for the unintended and/or unexpected effects of EU action.
- **Transparency and accountability:** All stakeholders and the general public have a right to know what the EU has done and achieved.
- **Efficient resource allocation:** Evaluation results contribute to a more efficient allocation of resources between interventions, the separate elements of a specific programme or activity, or between activities.

⁷⁹ Such a framework may be purely regulatory, but is often a mix of regulatory and non-regulatory actions and in some instances, it can be wholly non-regulatory e.g. consisting of EU level strategies, guidance documents etc.

What are the requirements to evaluate?

Evaluations are an essential step to manage and revise the existing body of EU legislation and policy and should, wherever possible, precede impact assessment⁸⁰.

The Commission is committed to evaluate in a proportionate way all EU spending and non-spending activities intended to have an impact on society or the economy⁸¹. A commitment to evaluation is included in Article 318 of the Treaty on the Functioning of the European Union (TFEU). Further sector-specific evaluation requirements are also explicitly included in the EU Treaties in the area of justice, freedom and security, common security and defence policy, research, technological development and space, industry, employment, social policy and public health. More specific requirements are often written into individual legal acts.

These commitments are all further enforced within the Commission's Internal Control Framework (principle 12)⁸².

Evaluation is required where:

- The legal basis of the relevant intervention so requires (e.g. a "review" clause where sufficient operational/implementation experience has accumulated to permit evaluation and/or specific evaluation requirements);
- Indicated by the Financial Regulation and Rules of Application (i.e. for all programmes and activities entailing significant overall spending (over €5 million);
- Indicated by Council Regulation (EU) 2015/323 on the financial regulation applicable to the 11th European Development Fund.

Where a DG has doubts about the degree of application, they should contact the Secretariat-General.

What are the procedural steps?

The time needed to prepare an evaluation will vary from case to case. Sufficient time needs to be allocated to ensure that the evaluation can be conducted according to these Guidelines and, where necessary, the Commission can report to the European Parliament and Council by the date set in the legal base. Where an evaluation is linked to a (review) clause that invites the Commission to present new proposals by a certain date, care must be taken to ensure that the planning allocates sufficient time for the evaluation and the impact assessment.

⁸⁰ See section *Applying Smart Regulation instruments*, Instructions of the Secretary-General implementing the European Commission 2014-2019 Working Methods available at: <https://myintracomm.ec.europa.eu/sg/comcab/pages/methods.aspx>.

⁸¹ SEC (2007)213 *Responding to Strategic Needs: Reinforcing the use of evaluation*.

⁸² The internal control framework C(2017) 2373: http://ec.europa.eu/budget/library/biblio/documents/control/C_2017_2373_Revision_ICF_en.pdf.

The key steps in an evaluation are⁸³:

1. **Political validation:** generally evaluations to be conducted by a Directorate-General are confirmed during the management plan process. At an appropriate point in time, each individual evaluation is introduced and validated in *Decide*;
2. Drafting of the **evaluation roadmap** by the lead DG, for agreement with the Secretariat-General. This roadmap provides a first description of the evaluation design, communicating the context, purpose and scope of the evaluation and outlining the proposed approach. The roadmap is published as early as possible by the Secretariat-General on the Commission's website⁸⁴. Publication of the roadmap will provide greater transparency and enable stakeholders to provide their feedback;
3. Establish an interservice group (ISG) to steer the evaluation. The ISG must be involved in all the key steps of the evaluation after the publication of the roadmap up until the launch of the interservice consultation on the staff working document (design and conduct). The ISG may also be consulted on any associated report/communication to the European Parliament and Council. The ISG must include a representative from the lead DG's evaluation function and a representative of the Secretariat-General;
4. Agree a **consultation strategy with the ISG**, complying with the requirements set out in Chapter VII, **including a 12 week internet-based public consultation**⁸⁵;
5. Prepare the **staff working document which responds to the issues in the roadmap, presents the analysis and answers the evaluation questions**. A short **executive summary** presenting the findings of the evaluation process may also be written. For those **evaluations selected for scrutiny by the Regulatory Scrutiny Board (RSB)**, the draft evaluation staff working document (SWD) must be submitted to the **RSB** and the Board's comments incorporated into the SWD;
6. Launch the **interservice consultation** for the SWD;
7. **Publish** the staff working document and any supporting contractors' (final) study report with associated terms of reference (or technical specifications) centrally. **Where required by the basic legal act**, transmit the staff working document to

⁸³ Further more detailed information on each individual step is provided in the Toolbox Chapter 6 *Evaluation and fitness checks*.

⁸⁴ <http://ec.europa.eu/info/law/better-regulation/initiatives>

⁸⁵ Without prejudice to the cases identified in Box 1 and the general rules set out in COM(2002) 704, the consultation strategy should include a 12 week internet-based public consultation at some point over the lifetime of the evaluation. Where the evaluation and IA are undertaken in parallel ("back to back") only one public consultation is needed as long as relevant stakeholders are consulted on all the main elements of the IA. Where the evaluation is of an activity conducted outside the EU or where the internet is not a practical support tool, including for duly justified confidentiality reasons, this mandatory public consultation may be waived as long as the consultation strategy envisages appropriate tools to reach the relevant stakeholders. See also Tool #1 on *Principles, procedures and exceptions*.

the Parliament and the Council together with a short Commission report/communication;

8. **Disseminate the evaluation findings** and encourage active discussion and debate on the findings with stakeholders;
9. Identify any **appropriate follow-up actions** to put into practice the lessons learned and feed the evaluation findings into the next step of the decision-making cycle. Some of this information may already be included in the report to the legislator where this is necessary.

2. KEY PRINCIPLES AND CONCEPTS

What are the principles?

All evaluations should be of high quality and respect certain principles:

Comprehensive: The definition of evaluation deliberately targets five criteria – effectiveness, efficiency, relevance, coherence and EU added value⁸⁶. Other criteria may also be added as appropriate.

Proportionate: The scope and analysis conducted must be tailored to the particular intervention, its maturity and the data available⁸⁷. For some criteria, new data will need to be collected, analysed and compared with other findings. For others, a short summary can be presented based on existing reports and information or providing a standard explanation (e.g. in areas where the EU has exclusive competence).

Independent and Objective: Robust and reliable results can be delivered only by independent and objective evaluations. An evaluation can be considered as independent when evaluators: (i) carry out their tasks without influence or pressure from the organisation; (ii) are given full access to all relevant information required; and (iii) have full autonomy in conducting and reporting their findings.

Transparent Judgement⁸⁸: Evaluators must make judgements based on the evidence (good or bad) and analysis available. These judgements should be as specific as possible and judgement criteria for each evaluation question (success factors, related indicators, required evidence and information) should be clearly identified during the design of the evaluation.

Evidence-based: Evaluations are based on the best available evidence (factual, opinion based etc.) which should be drawn from a diverse and appropriate range of methods and sources (**triangulation**). Not all sources of evidence are equally robust and consideration must be given as to when and how the evidence was collected and whether there is any bias or uncertainty in it. Where possible, sensitivity and/or scenario analysis should be

⁸⁶ See Tool #47 on *Evaluation criteria and questions*.

⁸⁷ In general, it is recommended to evaluate only once sufficient time has elapsed from the implementation of the intervention to allow at least 3 years of reasonably full data to be collected. See Tool #45 on *How to undertake a proportionate evaluation*.

⁸⁸ The requirement to provide judgements can be a critical factor distinguishing an evaluation from a study.

conducted to help test robustness of the analysis⁸⁹. Any limitations to the evidence used and the methodology applied, particularly in terms of their ability to support the conclusions, must be clearly explained.

What are the concepts?

Deciding when and how to evaluate requires careful consideration. There is no one-size-fits-all rule, reflecting the Commission's decision to decentralise evaluation and the different intervention life-cycles that exist. All interventions follow their own cycle and timeline for the desired results to manifest themselves. Often trade-offs need to be made between when and how to conduct the evaluation (in order to feed the decision-making process) and the amount of reliable data which is available.

The starting point for an evaluation is to consider how the intervention was expected to work. This requires identification of the different steps and actors involved in the intervention which in turn allows identification of the expected cause and effect relationships. There are many different ways to do this and Figure 1 illustrates one (traditional) way to describe how the different components of evaluation can be linked together⁹⁰. The intervention logic is an important tool for both communication and analysis. The following considerations are linked to the intervention logic:

- Evaluations should try to establish to what extent the intervention is responsible for the observed changes.
- Cause and effect relationships are challenging to prove, particularly when evaluating EU policies which operate in a complex environment influenced by a wide range of factors falling both within and outside the scope of the EU intervention.
- When evaluating EU legislation, it is particularly difficult to identify a robust counter-factual situation (i.e. what the situation would be if EU laws had not been adopted).
- When causal evaluation is not possible, or only at disproportionate effort, EU evaluations have to rely on qualitative, reasoned arguments (backed by the appropriate quantitative and qualitative evidence) about the likely role/contribution of an EU intervention to the changes observed.

Evaluations compare critically what has actually happened to what was expected to happen:

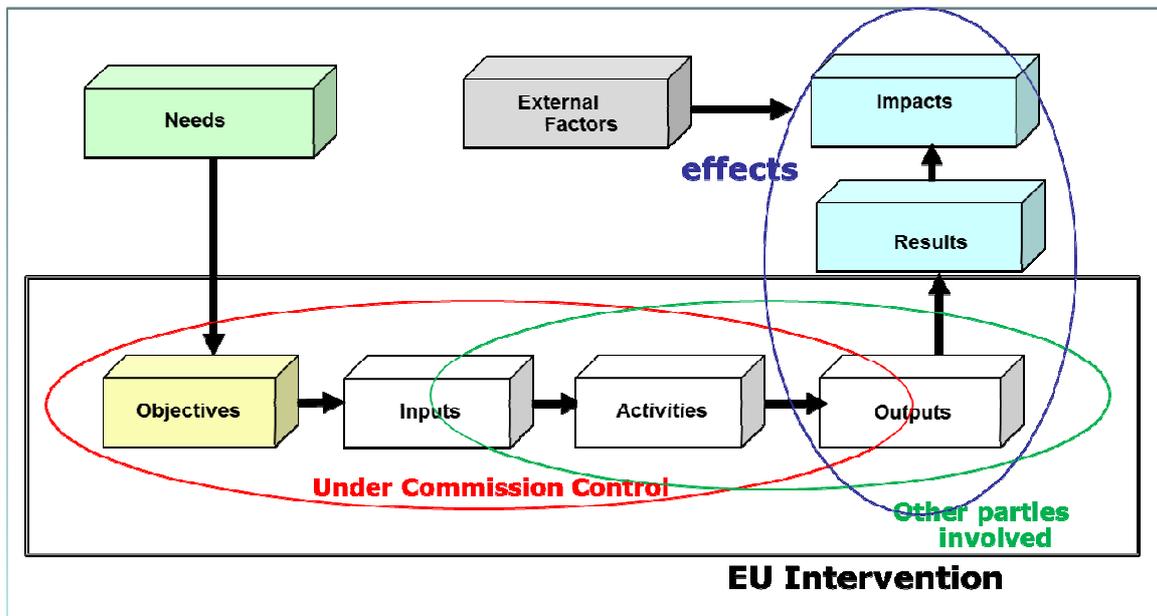
- Usually this is done by devising a set of evaluation questions related to the five standard evaluation criteria.
- There may also be additional considerations for judging performance depending on the timing and purpose of the evaluation and the questions being asked (e.g. the baseline and other points of comparison).

⁸⁹ See Tool #57 on *Analytical methods to compare options or assess performance*.

⁹⁰ Further guidance on how to create an intervention logic is provided in the Tool #46 on *Designing the evaluation*.

- The evaluation must be informed by earlier impact assessments covering the same intervention.
- Where the impact assessment has paid particular attention to certain stakeholder groups, or categories of impacts (e.g. economic, social, environmental), the subsequent evaluation must perform the corresponding complementary retrospective analysis or explain why this has not been possible⁹¹.

Figure 1: The different components of the intervention logic



3. KEY QUESTIONS AN EVALUATION MUST ANSWER

The questions an evaluation must answer ⁹²	
1.	<i>What is the current situation?</i>
2.	<i>How effective has the EU intervention been?</i>
3.	<i>How efficient has the EU intervention been?</i>
4.	<i>How relevant is the EU intervention?</i>
5.	<i>How coherent is the EU intervention internally and with other (EU) actions?</i>

⁹¹ Care needs to be taken to consider how expected impacts may have altered as a result of changes to the proposal introduced during the adoption process, which may have been assessed in impact assessment work conducted by the legislator.

⁹² These questions should not be used as direct questions in consultation activities. Questions in consultations should be formulated in a way that the replies provide insights which enable the evaluation officer to respond to the evaluation questions.

The questions an evaluation must answer⁹²

6. *What is the EU added value of the intervention?*

All evaluations must answer the above listed questions⁹³, following a process which complies with the principles identified in the previous section. Depending on the subject being evaluated, further evaluation criteria may be added e.g. sustainability, utility etc.⁹⁴

3.1. *Question 1: What is the current situation?*

An evaluation starts by finding out how the situation has evolved since the intervention began, how the intervention has been implemented and/or applied, what has happened/is happening to different stakeholders.

The answer to this question should give all readers an overview of the current situation and explain key issues or external factors that may be referred to later when answering the remaining questions.

The first step of an evaluation is to understand the background, context and current situation of an intervention. Developing a clear understanding of the current situation and its underlying factors involves answering the following set of questions:

- What is the origin of the intervention and what were its objectives?
- What are the appropriate points of comparison against which to judge changes?
- Where things are – what progress has been made over time? Have there been problems related to the implementation and application of the intervention (perhaps evidenced by infringement procedures)?
- What is the current situation for different stakeholders and how are they affected by the intervention? This should include consideration of how different elements of the intervention or different options have worked in practice.

Addressing these questions will ensure that the evaluation stays concrete and focussed, remaining close to stakeholders' concerns.

3.2. *Question 2: How effective has the EU intervention been?*

The evaluation should analyse the progress made towards achieving the objectives of the intervention, looking for evidence of **why**, **whether** or **how** these changes are linked to the EU intervention.

⁹³ The evaluation of a single intervention may, on an exceptional basis, omit one or two of the five evaluation criteria subject to agreement of the Secretariat-General. Clear justification for such omission must then be provided in the evaluation roadmap and repeated in the final evaluation staff working document. Fitness checks always consider the five criteria.

⁹⁴ Further information is provided in Tool #47 on *Evaluation criteria and questions*.

The answer to this question should go further than showing if the intervention is on track. It should seek to identify the factors driving or hindering progress and how they are linked (or not) to the EU intervention.

Effectiveness analysis considers how successful EU action has been in achieving or progressing towards its objectives, using appropriate points of comparison (including from a prior impact assessment). The evaluation should form an opinion on the progress made to date and the role of the EU action in delivering the observed changes. If the objectives (general, specific, operational) have not been achieved or things are not on track, an assessment should be made of the *extent* to which progress has fallen short of the target and what factors have influenced *why* something was unsuccessful or *why* it has not yet been achieved. Consideration should also be given to whether the objectives can still be achieved on time or with what delay. The analysis should also try to identify if any *unexpected* or *unintended* effects have occurred.

Typical examples of effectiveness questions

- What have been the (quantitative and qualitative) effects of the intervention?
- To what extent do the observed effects link to the intervention?
- To what extent can these changes/effects be credited to the intervention?
- To what extent can factors influencing the observed achievements be linked to the EU intervention?
- For spending programmes, did the associated EU anti-fraud measures allow for the prevention and timely detection of fraud?

3.3. Question 3: How efficient has the EU intervention been?

The evaluation should always look closely at both the costs *and* benefits of the EU intervention as they accrue to different stakeholders, identifying what factors are driving these costs/benefits and how these factors relate to the EU intervention.

The answer to this question should provide evidence on the actual costs and benefits, making it clear what can be linked to the EU intervention and what cannot. Efficiency analysis is a key input to policymaking, helping both policy-makers and stakeholders to draw conclusions on whether the costs of the EU intervention are proportionate to the benefits.

Efficiency considers the relationship between the resources used by an intervention and the changes generated by the intervention (which may be positive or negative). Differences in the way an intervention is approached and conducted can have a significant influence on the effects, making it interesting to consider whether other choices (e.g. as demonstrated via different Member States) achieved the same benefits at less cost (or greater benefits at the same cost).

Efficiency analysis can differ depending on the type of intervention being evaluated. Typical efficiency analysis will include an examination of administrative and regulatory costs and look at aspects of simplification – these are important for *all* evaluations. Evaluations and fitness checks should aim to quantify regulatory costs and benefits and

to identify burdensome and complex aspects of EU legislation and its implementation in the Member States as well as any subsequent implementing or delegated act adopted by the Commission. **Where appropriate, evaluation findings should pin-point areas where there is potential to reduce inefficiencies (particularly unnecessary regulatory costs) and simplify the intervention.** This may require a series of different points of comparison or benchmarks to be identified, depending on the questions asked/answers sought.

The full efforts to support and perform an intervention can be broken into different categories such as: staff, purchases made, time and/or money spent, fixed costs, running costs, etc. These costs can be associated to different aspects of an intervention and judged against the benefits achieved.⁹⁵

Good evaluations should make strong efforts to go beyond a qualitative description of the different costs and benefits of the EU intervention and seek to quantify them. While assessing costs and benefits may be (methodologically) easier for spending programmes, such assessment in policy areas may be a challenge since obtaining robust, good quality data is difficult, particularly across all Member States which may have implemented legislation in a variety of different manners.

Typical examples of efficiency questions

- To what extent has the intervention been cost-effective?
- To what extent are the costs of the intervention justified, given the changes/effects it has achieved?
- To what extent are the costs associated with the intervention proportionate to the benefits it has generated? What factors are influencing any particular discrepancies? How do these factors link to the intervention?
- To what extent do factors linked to the intervention influence the efficiency with which the observed achievements were attained? What other factors influence the costs and benefits?
- How proportionate were the costs of the intervention borne by different stakeholder groups taking into account the distribution of the associated benefits?
- Are there opportunities to simplify the legislation or reduce unnecessary regulatory costs without undermining the intended objectives of the intervention?
- If there are significant differences in costs (or benefits) between Member States, what is causing them? How do these differences link to the intervention?
- How timely and efficient is the intervention's process for reporting and monitoring?

⁹⁵ Further information is provided in Tool #58 on the *Typology of costs and benefits*.

3.4. **Question 4: How relevant is the EU intervention?**

The evaluation must look at the objectives of the EU intervention being evaluated and see how well they (still) match the (current) needs and problems.

The answer to this question should identify if there is any mismatch between the objectives of the intervention and the (current) needs or problems. This is key information that will assist policymakers in deciding whether to continue, change or stop an intervention.

Relevance looks at the relationship between the needs and problems in society and the objectives of the intervention and hence touches on aspects of design. Things change over time. Certain objectives may be met or superseded; needs and problems change and new ones arise. Relevance analysis is very important because if an intervention does not help to address current needs or problems then it does not matter how effective, efficient or coherent it is no longer appropriate. This is why there is a strong link between relevance analysis and the criteria of EU added value which assesses whether action continues to be justified at the EU level. Often the starting (comparison) point when answering relevance questions is the current situation, although there may be other key points in the past or (near) future which should also be considered.

Typical examples of relevance questions

- To what extent is the intervention still relevant?
- To what extent have the (original) objectives proven to have been appropriate for the intervention in question?
- How well do the (original) objectives of the intervention (still) correspond to the needs within the EU?
- How well adapted is the intervention to subsequent technological or scientific advances?
- How relevant is the EU intervention to EU citizens?

3.5 **Question 5: How coherent is the EU intervention internally and with other (EU) actions?**

The evaluation should look at how well the intervention works: i) internally and ii) with other EU interventions.

The answer to this question should provide evidence of where and how EU interventions are working well together (e.g. to achieve common objectives or as complementary actions) or point to areas where there are tensions (e.g. objectives which are potentially contradictory, or approaches which are causing inefficiencies).

No policy exists in a vacuum. There are many different actors involved in many different interventions, both inside and outside the EU. Even small changes in how one intervention is designed or implemented can trigger improvements or inconsistencies with other ongoing actions. The evaluation of coherence involves looking at how well or not different actions work together. The comparison points for coherence may vary according both to time, and to the level of coherence being considered.

Checking internal coherence means looking at how the various components of the same EU intervention operate together to achieve its objectives. Similar issues can arise externally at different levels: for example, between interventions within the same policy field (e.g. a specific intervention on drinking water and wider EU water policy) or in areas which may have to work together (e.g. water policy and chemicals policy, or chemicals and health and safety). At its widest, external coherence can look at compliance with international agreements/declarations (for example EU labour market initiatives might be looking into coherence with ILO conventions) or EU interventions in developing countries.

The focus on coherence may vary depending on the type of evaluation and is particularly important in fitness checks, where coherence analysis will look for evidence of synergies or inconsistencies between actions in a related field which are expected to work together. Even when evaluating an individual intervention, it can be important to check coherence with (a limited number of) other interventions.

Typical examples of coherence questions

- To what extent is this intervention coherent with other interventions which have similar objectives?
- To what extent is the intervention coherent internally?
- To what extent is the intervention coherent with wider EU policy?
- To what extent is the intervention coherent with international obligations?

3.6. Question 6: What is the EU added value of the intervention?

The evaluation should consider arguments about the value resulting from EU interventions that is additional to the value that would have resulted from interventions initiated at regional or national levels by both public authorities and the private sector.

The answer to this question should, where applicable, respond to the subsidiarity analysis conducted in any related IA. For spending programmes, EU added value may result from different factors e.g. co-ordination gains, improved legal certainty, greater effectiveness or complementarity. The analysis of EU added value is often limited to the qualitative, given the stated difficulties to identify a counterfactual.

EU added value⁹⁶ looks for changes which it can reasonably be argued are due to the EU intervention over and above what could reasonably have been expected from national actions by Member States. In many ways, the evaluation of EU added value brings together the findings of the other criteria, presenting the arguments on causality and drawing conclusions, based on the evidence to hand, about the performance of the EU intervention and whether it is still justified. EU added value analysis should, where applicable, be done with reference to the subsidiarity analysis conducted in any related IA.

⁹⁶ For further information see SEC(2011) 867 final *The added value of the EU budget*. Also see Tool #5 on *Legal basis, subsidiarity and proportionality*.

The sources and nature of this additional value vary from intervention to intervention. It is, in particular, useful to distinguish the EU added value of a policy measure in general (such as an EU regulation to foster the single market) and that of an EU spending programme per se. In both cases, EU added value may be the results of different factors: coordination gains, legal certainty, greater effectiveness or efficiency, complementarities etc. In all cases, concluding on the continued need for the intervention at EU level may be difficult as measuring EU added value is challenging.

In areas where the EU has exclusive competence, the answer to the question of EU added value may simply involve restating the reasons why the EU has exclusive competence or by referring to the efficiency and effectiveness analysis. In such instances, the evaluation may focus more strongly on consideration of the relevance and efficiency of the intervention.

Where there is little evidence of the EU added value of an intervention, consideration should be given to its repeal.

Typical examples of EU added value questions

- What is the additional value resulting from the EU intervention(s), compared to what could reasonably have been expected from Member States acting at national and/or regional levels?
- What would be the most likely consequences of stopping or withdrawing the existing EU intervention?

4. SUMMING IT ALL UP: THE EVALUATION STAFF WORKING DOCUMENT

The evaluation staff working document (SWD) summarises and presents the final results of the evaluation process. It draws on work conducted:

- Exclusively by external contractors (via one or more study reports)
- And/or the Commission services.

The lead DG must take a position on the robustness of the process and findings, stating if necessary, where there are any disagreements and why.

The evaluation SWD will communicate the results and conclusions of the evaluation: (i) to policymakers, helping to inform their decision-making and (ii) to stakeholders, sharing the method, evidence base and analysis used for the evaluation. It will draw together all the different steps of the evaluation process – answering the commitments made in the evaluation roadmap or explaining why this has not been possible, summarising and critiquing the method applied, the evidence collected and the analysis conducted, drawn from a wide range of sources. The evaluation SWD should be transparent, objective and balanced. Non-expert readers should be able to follow the arguments. A template for the format of the evaluation SWD can be found on the evaluation pages of GoPro.

The SWD presents in a self-standing and non-technical manner the process, evidence and analysis, and is likely to be around 50-60 pages (excluding annexes but including tables and figures). The process followed for the evaluation may influence the length of the evaluation SWD, but even where the full body of work described in the evaluation roadmap has been outsourced to contractors, who have written up their process and

findings as a separate document, the evaluation SWD must provide sufficient detail to enable the reader to follow the evidence and logic and to understand the answers and conclusions without having to read any supporting materials.

In all instances, stakeholder views and how these have been considered should be transparently referred to throughout the evaluation SWD (and any supporting contractor's study) as well as summarised in the synopsis report⁹⁷, to be added as an annex to the SWD. All external material used (reports, scientific findings etc.) should also be systematically referenced. Where there is no requirement to report to the European Parliament and Council, a short executive summary (maximum length two pages) must also be prepared and translated into English, French and German, providing an easily accessible overview of the headline findings from the evaluation.

The Regulatory Scrutiny Board will scrutinise the evaluation SWD of the major evaluations and fitness checks it selects, and the related interservice consultation cannot be launched before the RSB has issued its opinion. The package sent to the RSB should include the draft evaluation SWD and associated executive summary (if relevant), the minutes of the last ISG meeting and where applicable the relevant contractors' study and associated quality assessment.

5. USING THE EVALUATION RESULTS

Evaluation results should be assessed and, where relevant, be complemented by follow up actions to ensure maximum use of the results. Active discussion and debate on these findings should be encouraged.

5.1. Disseminating the evaluation findings

Evaluation is an opportunity to assess the performance of an EU intervention and feed any lessons learned into the next round of decision-making in a timely manner. By conducting evaluations in a transparent manner the Commission is providing an account of its actions to all interested stakeholders and EU citizens. To maximise transparency and ease access, the final evaluation staff working document must be published centrally alongside the final evaluation roadmap, consultation strategy and related consultation documents, terms of reference (or technical specifications) and the associated contractor's final study (if applicable) and the opinion of the Regulatory Scrutiny Board (if applicable).

Further dissemination activities tailored to the needs of the different audiences who may wish to know about the evaluation and what it has concluded should also be considered⁹⁸. It is best practice to solicit feedback from stakeholders which can then feed into follow-up activities.

5.2. Identifying the follow-up actions

Evaluation is not the end of the process. Completing the evaluation Staff Working Document and disseminating the evaluation findings should stimulate discussion and help with the identification of appropriate follow-up actions to put into practice the

⁹⁷ See Chapter VII

⁹⁸ Further information on dissemination can be found in Tool #50 on *Disseminating the evaluation findings*.

lessons learned and feed the evaluation findings into the next cycle of decision-making. The evaluation results must feed into the annual activity reports and related follow-up actions must be identified in the annual management plans of the Commission services.

Follow-up can take many forms, such as an impact assessment or improving guidance or further monitoring. Identifying and sharing the planned follow-up actions is part of accepting responsibility and accountability for EU actions and ensures transparency.

In many instances, the immediate dissemination/follow-up to an evaluation is identified in the legal base of the intervention and takes the form of a Commission Report to the European Parliament and the Council on the findings of the evaluation. In this instance, the Commission Report should be a short document, presenting the headline findings of the evaluation and presenting next steps (in varying detail depending on what is appropriate).