



provide clearer information about the demand for projects and the major beneficiaries of funding. On that basis the report should better demonstrate the effectiveness of the LIFE programme in delivering the targeted environmental benefits, particularly when compared to the alternative of regulatory measures.

**(2) Be more explicit on the policy areas that would require intervention at the EU level and better situate the LIFE programme among other funding programmes.**

The report should better explain the role the LIFE programme should play in the new programming period, and should provide illustrative examples of the types of projects that it could finance and that would be impossible to finance under other programmes (e.g. green component of Common Agricultural Policy, Cohesion and structural funds, or funds available under Horizon 2020). Additionally, the report should be clearer about the role of the LIFE instrument in mobilising and co-ordinating environmental expenditure from these programmes, and how it would contribute to maximising synergies/avoiding overlaps. In a similar vein, the role of the LIFE programme in addressing challenges, stemming either from market conditions (e.g. promotion of eco-innovation) or from the regulatory framework (e.g. supporting the implementation of new legislation) should be outlined more clearly.

**(3) Better justify the proposed changes and assess their impact.** The IA report should clarify which new elements are proposed under each option and how they address the recommendations of evaluations. When doing so, the report should analyse alternative options related to the sectoral allocation of Integrated Projects, as well as to the allocation of resources between different sub-components in the environment and climate specific programmes. Policy options should be then compared against the fully developed baseline (i.e. business as usual) scenario, including all the improvements already done or planned. Particularly, the report should discuss in more depth how the proposed change options would affect the current distribution of projects – both geographical and per action area (e.g. water, air, etc). The report should also discuss the impact of the LIFE programme on the implementation of the environmental legislation in the Member States.

**(4) Better analyse administrative cost impacts.** The report should include a more detailed analysis of the administrative costs (currently estimated at 6%), including an overview of the programme strands/types of project where these tend to be particularly high, and of how these compare with similar programmes. On that basis it should consider a more rigorous assessment of simplification options. This should include issues such as the externalisation of management of the programme, multiannual programming/prioritisation, and administrative costs for the beneficiaries.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

**(D) Procedure and presentation**

The different opinions of stakeholders on the specific measures, where relevant, should be added. The IA report should also be clearer whether the opinions belong to the beneficiaries of the funding or to the implementing bodies. Limitations of the applied methodology, in particular for the assessment of environmental benefits, need to be acknowledged upfront and in a more transparent manner.

**(E) IAB scrutiny process**

Reference number	2011/ENV+/005 ENV and CLIMA
External expertise used	No
Date of IAB meeting	Written procedure