



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels,  
D(2011)

## Opinion

**Title**                      **DG ENV - Impact Assessment on: Eco-innovation action plan  
(Resubmitted draft: version of 25 May 2011)**

### **(A) Context**

In January 2004, the Commission adopted an Environmental Technologies Action Plan (ETAP) to improve the development and wider use of environmental technologies in Europe. This impact assessment accompanies a policy initiative building on the ETAP, which intends to step up efforts in support of eco-innovation as a useful means to address the challenges of environmental protection, competitiveness and job creation. The eco-innovation action plan builds on the Europe 2020 flagship initiative "Innovation Union", which announced it was being developed.

### **(B) Overall assessment**

**While the report has been improved along the lines of most of the recommendations issued by the Board in its first opinion, several aspects should be further strengthened to better justify the need for and EU value added of an eco-innovation action plan. Firstly, the report should provide some illustrative sector-specific examples to substantiate the problem drivers. It should then better explain why these drivers are expected to be more important in respect of eco-innovation as compared to innovation in general and why they cannot be addressed sufficiently by the general innovation policy instruments. Secondly, the report should further improve the definition and comparison of options. Finally, the views of stakeholders should be transparently reflected throughout the IA report.**

### **(C) Main recommendations for improvements**

**(1) Further clarify some of the aspects of the problem definition.** While the revised report indicates whether the problem drivers are specific to eco-innovation or innovation in general, there is still a need to substantiate the existence of these drivers with adequate evidence. This could for instance be done by providing some sector-specific examples.

Such examples would also better illustrate why the problem drivers cannot be addressed sufficiently by the general innovation policy instruments, even if most of the problem drivers are not eco-innovation specific. It would also strengthen the argument regarding the need for and value added of the EU action in the area of eco-innovation. The report should also be more explicit about the "problems related to environmental acquis" (section 3.5) and should analyse them in greater detail. Finally, the table summarising how the objectives are related to removing the identified problem drivers should be moved from Annex XIII to the main text.

**(2) Further improve the definition and comparison of options.** The report should better explain why the objective of increasing eco-innovation results in an option focusing on SME-targeted actions (option 3), by corroborating the underlying reasoning that SMEs have relatively large eco-innovation potential and that actions can effectively be targeted at existing SMEs. The report should explain how the scores in the overall comparison table (section 7.2.1) were assigned and how they relate to the detailed scores in Annex XII. The intervention logic could also be further strengthened, by providing greater clarity on which actions are going to achieve the defined objectives. This should be done by moving some of the information from Annex XII into the main text. Finally, the claim that options 3 and 4 combine well and that there are no negative trade-offs between them could be further substantiated with appropriate additional combination options.

**(3) Reflect the stakeholders' views throughout the report.** In addition to the main conclusions of consultations provided in section 2.1, the views of stakeholders should be transparently reflected throughout the IA report (for instance in the section describing different actions), in particular where they diverge significantly.

#### **(D) Procedure and presentation**

The executive summary should be provided as a separate document and should respect the standards of the IA guidelines (Annex 4). The section explaining how the recommendations of the IAB have been taken into account should be more detailed, as significant changes have been made to the IA report. The report still needs to clarify whether stakeholders provided input after the 'Innovation Union' initiative was adopted. References to the relevant annexes should be provided systematically throughout the report.

#### **(E) IAB scrutiny process**

Reference number	2009/ENV+/003
External expertise used	No
Date of Board Meeting	Written procedure The present opinion concerns a resubmitted draft IA report. The first opinion was issued on 17 December 2010.