



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
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Opinion*

Title

**DG ENV - An EU initiative on the Communication
"A Blueprint to Safeguard Europe's Water Resources"
(draft version of 20/06/2012)**

(A) Context

The "Blueprint" Impact Assessment (IA) brings together the output of the assessment of River Basin Management Plans (RBMP), the review of the Water Scarcity and Droughts (WSD) policy, the review of the vulnerability of water resources to climate change and other man-made pressures and the Fitness Check of EU freshwater policy, by conducting several cross-cutting strands of analysis and by making the link with other studies and research projects. It focuses on the identification of the key challenges for water resources management and the assessment of a set of policy options for action at EU level. The IA pays attention to the articulation with the current Common Implementation Strategy (CIS) of the Water Framework Directive.

(B) Overall assessment

The report should be improved in several aspects. Firstly, it should strengthen the problem definition by presenting up-front a comprehensive overview of the implementation gaps, market failures behind and legal problems of the current water policy framework, and by subsequently identifying clearly the concrete problems to be addressed by the blueprint. On that basis the report should develop a fully integrated baseline scenario showing the evolution of the problematic issues, and discuss the legal base for the elements of the toolkit that would require legislative action. Secondly, it should express the objectives in more specific terms and link them better to the refocused set of problems to provide greater clarity on what the blueprint in practice intends to achieve. The report should also explain the available policy measures and the construction of the options/alternative sets of measures in more detail. Finally, the report should better assess the impacts of the options, mainly with respect to Member State/regional effects, enterprises/SMEs, and the development (reduction) of administrative costs.

* Note that this opinion concerns a draft impact assessment report which may differ from the one adopted
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(C) Main recommendations for improvements

(1) Strengthen the problem definition and their drivers and reinforce the baseline scenario. The report should be more focussed in presenting the problems, by clearly showing the relevant deficiencies of the current water policy and by explaining its implementation gaps and unsolved legal problems. On the basis of a comprehensive overall problem presentation the report should clearly identify the concrete problems to be addressed by the blueprint. This can be achieved by better presenting and integrating the current 'level 1' and 'level 2' problems with the 12 specific problems currently presented in annex 3. The refocused set of problems should then be corroborated by concrete Member State data and examples, such as the actual status of the water bodies. Finally, the report should considerably reinforce the presentation of the baseline scenario by integrating the scattered analysis presented in annex 1 synthetically into the main text. In doing so it should become clear how the different implementation gaps in the Member States would evolve, in how far the discharge of pollutants is expected to remain a problem in the long run and, for instance, how on-going activities to improve the knowledge base will close information gaps. Finally, the report should discuss the legal basis for the elements of the toolkit that would require legislative action.

(2) Establish clearer objectives and better define the policy options. On the basis of the revised problem definition, the report should define "smarter" policy objectives, clearly indicating what the 'Blueprint' is trying to achieve in practice. To this end it should differentiate them in general, specific, and operational objectives avoiding general expressions like e. g. "more efficient water governance" which are difficult to translate into subsequent progress indicators for monitoring and evaluation purposes. Finally, the report should better explain the logic behind the identification of the different policy measures and their possible combination into option packages/alternative sets of measures. It should be clarified that they constitute a kind of toolkit where the Member States can choose from based on necessity.

(3) Better assess and compare impacts. The report should present a more complete assessment of the impacts across the three pillars, providing a more comprehensive qualitative assessment. This should include the quantification of expected costs and benefits for Member States, where feasible. In doing so, the report should better explain the assumptions underlying the analysis, for instance by moving relevant analytical information from annex 4 to the main text. The report should be clearer on expected Member State/regional impacts, given their different specific problems and implementation gaps of water related legislation. Moreover, the report should more explicitly assess impacts on business/SMEs, for instance by detailing how they would be affected due to stricter water pricing policies. This should include a deeper analysis of the development of administrative burden, by indicating how the Member States and enterprises (including farmers) would be affected by the proposed measures and by analysing explicitly and quantifying any reduction potential. Finally, the report should explicitly compare, on the basis of a revised set of specific objectives, the different policy option packages against a fully developed baseline scenario.

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 report should avoid the excessive use of abbreviations and include a glossary. It should better balance the distribution of relevant information between the annexes and the main text, by moving purely descriptive parts to the annex and by moving relevant analytical data to the respective sections in the main text. Different stakeholder views should be reflected more thoroughly throughout the report.

(E) IAB scrutiny process

Reference number	2012/ENV/005
External expertise used	No
Date of IAB meeting	18/07/2012