



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
D(2012)

Opinion

Title **DG ENV - Impact Assessment on a new EU Environment Action Programme**
(draft version of 14 June 2012)*

(A) Context

Environment Action Programmes have guided the development of the EU environment policy since the early seventies. The 6th Environment Action Programme (EAP) expires in July 2012. A new EAP is requested by stakeholders, including the Council and the European Parliament.

The new EAP aims to establish the overarching environment policy objectives that should drive environment policy development to contribute to further environmental improvements as well as to the EU's broader objectives of smart, sustainable and inclusive growth. Three policy objectives are identified: (1) To protect, conserve and enhance the EU's natural capital; (2) To turn the EU into a resource efficient and more competitive low-carbon economy; (3) To safeguard EU citizens from environment-related pressure and risks to health and wellbeing.

(B) Overall assessment

The report should be improved in a number of respects. Firstly, it should better explain the purpose of the initiative and describe the value-added of the 7th EAP in relation to existing strategies in addressing the major environmental problems the EU is facing. Secondly, the report should strengthen the baseline by concretely describing the evolution of the current situation with no new EAP. Thirdly, the report should define specific objectives that better correspond to the identified problem drivers and clarify the corresponding monitoring and evaluation arrangements. Fourthly, the report should better define the policy options and show how the options differ from the status quo by clarifying which measures are already being implemented or planned, and which are complementary measures. In addition, the report should clearly flag for which measures follow-up impact assessments are envisaged. Fifthly, the report should compare the options against a set of criteria that measure effectiveness, efficiency and coherence. Moreover, the report should analyse the impacts before the preferred option is chosen.

In their written communication with the Board DG ENV accepted to amend the report along the lines of these recommendations.

* Note that this opinion concerns a draft impact assessment report which may differ from the one adopted

(C) Main recommendations for improvements

(1) Better explain the purpose and value added of the 7th EAP. The report should clearly explain the purpose and value-added of this initiative compared to existing strategic documents such as the Roadmap for a Resource-Efficient Europe, the EU Biodiversity Strategy to 2020, or the Roadmap for moving to a competitive low carbon economy in 2050, which already set the strategic objectives in various areas for 2020 and beyond. The report should clarify what gaps the 7th EAP is intended to address. In addition, the report should make more extensive use of the results of the evaluation of the 6th EAP to demonstrate how the shortcomings of the 6th EAP will be addressed in the new EAP.

(2) Strengthen the baseline scenario. The report should present a more robust and detailed baseline scenario describing how the situation would evolve without a new EAP and without any change in respect of policy content. This should include developments in the main areas identified: natural capital, sustainable, low-carbon growth, human health and well-being. In addition, the report should better explain why "smarter implementation" and better coherence will not be achieved as part of the baseline scenario. Furthermore, the report should establish a better link between the individual elements of the baseline scenario in the Annex and the analysis of what would happen in the absence of a new EAP.

(3) Better define the objectives and clarify the corresponding monitoring and evaluation arrangements. The report should define more specific objectives that better correspond to the five identified problem drivers. The report should also clarify how the big categories of the priority objectives identified in the Annex relate to the general and specific objectives. The report should present clearer monitoring and evaluation arrangements. In particular, the report should link the monitoring indicators more closely to the objectives while clarifying whether they will measure the success of specific or priority objectives identified in the Annex. The report should distinguish between existing indicators and the ones that still need to be developed to monitor the progress of this initiative. The report should present a clearer timetable for future evaluation work.

(4) Clarify the content of the policy options. The report should better explain the content of the options for 'policy content' and 'delivery mechanism'. It should clearly show how the options differ from the status quo and from one another. In doing so, the report should clearly identify, which measures are already planned (hence should already be covered by option 1 status quo), and the new initiatives. As currently described, the options presented for policy content do not seem to be real alternatives since they could be considered more as goals rather than options (e.g. smarter implementation). The report should therefore reformulate the options in a way that it makes clear what choices need to be made for future environmental policy through the 7th EAP. This can be done, for instance, by explaining why the objectives presented in the Annex were chosen as priority objectives. In addition, the report should also clearly flag for which of these elements follow-up impact assessments are planned.

(5) Improve the analysis and comparison of impacts. The report should provide more detail on expected economic and social impacts of the different options where applicable. The analysis of impacts should be done before the preferred option is chosen. The report should compare the options based on criteria of effectiveness, efficiency and coherence. It should base this comparison on the analysis of impacts for different economic actors (sectors, regions) where possible, distinguishing between benefits and costs. In comparing the options, the report should clearly identify any trade-offs between

environmental, social and economic impacts where possible.

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 text should be made more accessible to the reader. The report should provide a reference list of the studies used in this impact assessment. A glossary of technical terms and abbreviations should be provided. In addition, missing footnotes in the Annex should be inserted. The executive summary should be presented following the requirements of the IA guidelines.

(E) IAB scrutiny process

Reference number	2012/ENV/013
External expertise used	No
Date of IAB meeting	18 July 2012 (Written Procedure)