



EUROPEAN COMMISSION  
Regulatory Scrutiny Board

Brussels,  
Ares(2019)

## Opinion

### **Title: Evaluation of the 7th Environment Action Programme**

(version of 20 December 2018)\*

### **Overall opinion: POSITIVE**

#### **(A) Context**

Environment Action Programmes (EAPs) guide the development of EU environmental policy, and have done so since the 1970s. The 7<sup>th</sup> EAP is a Decision that the Council and the European Parliament adopted to plan and manage action to improve the environment in Europe 2014-2020. It also projects EU environmental action up to 2050.

The 7<sup>th</sup> EAP sets nine objectives and lists new, on-going and planned EU actions to achieve them. The instrument aims to make actions smarter, faster and better co-ordinated.

This evaluation is legally required. It feeds into a future decision on whether to adopt an 8<sup>th</sup> EAP, and what a new framework would look like.

One challenge of this evaluation is to distinguish the merits of the 7<sup>th</sup> EAP as an instrument (including the deliberative process of its development) from progress in environment and climate policy more generally.

#### **(B) Main considerations**

**The Board recognises that this evaluation was difficult to carry out. The report is a good effort and is upfront about limitations of the analysis.**

**The Board gives a positive opinion, but considers that the report should be improved with respect to the following key aspects:**

- (1) The report does not examine whether the process of co-decision has achieved its objectives.**
- (2) The report is not sufficiently clear about the standards against which it evaluates the 7<sup>th</sup> EAP's performance. Some of the conclusions are not sufficiently supported by evidence.**

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\* Note that this opinion concerns a draft evaluation report which may differ from the final version.

**(3) The report does not sufficiently examine how the 7<sup>th</sup> EAP may have shifted the narrative and raised the prominence of environmental policy and sustainable development goals.**

**(C) Further considerations and recommendations**

(1) The 7<sup>th</sup> EAP was the first environmental action programme that the Lisbon Treaty required to be agreed in co-decision. To learn from this first round for the future, the evaluation should examine what went well under this regime and what did not.

(2) The evaluation should clarify its intervention logic, including with regard to the objectives of the 7<sup>th</sup> EAP. The logic should make clear the relationship between how the strategy has operated and the observed progress toward policy objectives. Some analysis of the performance of the 7<sup>th</sup> EAP as a strategy that is currently in Annex 3 should be better integrated in the intervention logic and the main report. A clearer comparison to the 6<sup>th</sup> EAP would also help the reader to understand what changes the 7<sup>th</sup> EAP brought, and whether those were successful.

(3) The report should draw more attention to the bigger picture, i.e., the role of the 7<sup>th</sup> EAP in reframing the narrative of environmental policy and bringing it to the fore in the general economic context. Internationally, this arguably includes anchoring negotiations on the Sustainable Development Goals. The report might elaborate on how the 7<sup>th</sup> EAP accommodated the Commission's priorities, helped develop positions for international negotiations, and generally guided environmental policymaking. While it may be difficult to establish causal links, it is useful to know the sequence of main activities and actions carried out in agreeing the 7<sup>th</sup> EAP or guided by it.

(4) The report's narrative should come out more strongly. In the current version, main messages are difficult to distil from the abundance of detail. The conclusion and executive summary might focus more on the main messages and reflect the overall picture rather than comprehensively summarise all analyses. The report should ensure that all of its conclusions are evidence-based. It should be transparent about what relevant information is not available, including with regard to stakeholder views.

*Some more technical comments have been transmitted directly to the author DG.*

**(D) RSB scrutiny process**

**The lead DG is advised to ensure that these recommendations are taken into account in the report prior to launching the interservice consultation.**

Full title	Evaluation of the 7th Environment Action Programme
Reference number	PLAN/2017/1389
Date of RSB meeting	30 January 2019