Opinion by the Scientific Committee on the "Evaluation of the European Environment Agency (EEA) and its European Environment Information and Observation Network (EIONET)" (SWD(2018) 470 final)

The Scientific Committee (SC) of the EEA appreciates being asked by the EEA Management Board (EEA/MB/2018/020) for its opinion on the SWD.

The SC has carefully considered the Commission Staff Working Document evaluation of the European Environment Agency (EEA) and the European Environment Information and Observation Network (hereafter referred to as SWD) as well as the consultancy study (hereafter referred to as COWI).

The SWD is very timely. Scientific knowledge of the sustainability crises facing the EU and the rest of the world call for clear action, informed by robust data and sound policy advice. With the new Commission presenting its work programme in 2019, now is a good opportunity for the EU to respond firmly to the sustainability crises, supported by the work of the EEA.

1. Supporting the positive conclusions of the SWD

The SC fully supports the positive conclusions of the SWD (p. 61), i.e. the "EEA and EIONET fulfilled the main objectives set by the Founding Regulation, which continue to be relevant, and provided EU value added by implementing the multi-annual work programmes in a largely effective, efficient and coherent way."

The SC finds, however, that the standing and positive contribution of the EEA has not been fully recognized by the SWD. The SWD focuses mainly on evaluating the role of the EEA in EU policy implementation. Had it focused on the full array of multiple actors and processes utilizing the EEA's knowledge, we are certain that its conclusions would have been even more positive.

2. Accounting for the full value of the EEA

The EEA's Multiannual Work Programme (MAWP) 2014-2020 identifies 4 strategic areas (SA). The SWD focuses mainly on *Informing policy implementation* (SA1) and *EEA management* (SA4), but does not fully recognize the importance of *Assessing systemic challenges* (SA2) and *Knowledge co-creation, sharing and use* (SA3). The SWD (p. 32) puts most emphasis on monitoring and data collection although it recognizes that *"Stakeholders' needs were not uniform in respect to how resources should be prioritised across the "MDIAK" (Monitoring, Data, Indicators, Assessments, Knowledge) chain. While Commission services tend to focus on the MDI-part, stakeholders from the member countries tend to emphasise the AK-part." The SC is pleased to observe that the EEA has made major contributions in assessing systemic challenges (SA2) and assisting in formulating coherent policy responses to them. The EEA has also worked closely with partners to co-create knowledge and facilitate its use (SA3). These aspects are hugely important for the whole of Europe's transition to sustainability.*

3. Appreciating the knowledge needs of multiple actors

Decisions that influence the European environment are made by multiple public and private actors. Many of these actors use the EEA as a trusted knowledge source when framing issues, forming options, implementing decisions and evaluating results. Among the EU institutions, the European Parliament and the European Court of Auditors also benefit from the EEA's work. Member state ministries and agencies draw on EEA knowledge, as do companies, NGOs and educational institutions. Some of these operate in member countries outside the EU 28. The general public and civil society form their views on environmental issues and responses based on knowledge that often originated in the EEA, and that was subsequently communicated through the media.

The SWD at times recognizes these actors and multiple channels, but is mainly focused on the knowledge demands of the Commission, and DG Environment in particular. *Having a perspective from a broader range of actors would offer a more realistic and more positive evaluation of the EEA*.

4. Ensuring sufficient resources for the EEA

It is clear that the knowledge provided by the EEA is needed now more than ever. It is thus surprising that this has not been reflected in the resources provided to the EEA: insuring sufficient means for the EEA to respond to the increasing demands by multiple stakeholders could have been more strongly stressed in the SWD section "lessons learnt". The SWD finds (p. 57) that it worked "effectively to deliver on its core objectives". It also (p. 58) concludes that "EEA/EIONET is very cost effective". But the direct consequence of every cut is to reduce the capacity of the EEA to deliver. There is thus limited or no scope for doing any additional work without additional resources.

In light of the findings of the SWD, and the urgent need for better knowledge on how to address the sustainability crises, a major inconsistency of the EEA's member countries is that they have not provided the EEA with sufficient resources. Based on the results presented in the SWD, the SC emphasizes that any further cuts in the budget of the EEA, as proposed in the EU Multiannual Financial Framework, should be reversed.

In addition to the main issues stressed above (1-4) we would like to raise two additional points.

5. The role of the SC in the SWD

Unlike the 2013 evaluation, when one out of five recommendations addressed our role, this evaluation does not provide any assessment of us. However, we are pleased that the COWI report notes that interviewees stated that "the interaction with the SC developed in a positive direction during the evaluation period" and that "the SC was very engaged and contributing in a positive way to the work of the EEA" (p. 325).

6. Improving future evaluations

The evaluation approach is in many ways based on standard evaluation thinking. The assessment is based on multiple criteria and many data sources are used in parallel. There are, however, also weaknesses that are a consequence *inter alia* of the use of Better Regulation Guidelines. It would be wise for the Commission to consider the value of these guidelines in their present form. We perceive that there are three shortcomings: the limited emphasis on how the EEA's products are actually used and how their use could be further promoted; the limited role of public participation in the evaluation; and the ambiguous role of the Commission, as both a key stakeholder and the actor writing the evaluation – it is by its name a Staff Working Document.

Adopted by the EEA Scientific Committee on 20 February 2019	Δ
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