

THE IMPACT OF EVALUATING CLIMATE AND ENVIRONMENTAL POLICIES: A CSO PERSPECTIVE

Patrick ten Brink, EU Policy Director

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EEB

European
Environmental
Bureau



EEB: WHO WE ARE AND WHAT IS OUR ROLE

Europe's largest network of environmental citizens' organisations:

153 civil society organisations, from **30 European countries**, **all 28 EU MS**,
Representing over **30m EU citizens**

Working on **environmental policy**, **interfaces between policy areas**,
integration and implementation

EEB, its members, working groups and coalitions:

- **Input into evaluations**
- **Comment on evaluation inputs and methods**
- **Use the evaluation results**
- **Recommends ways forward**
- **Fund research and assessments where there are important gaps**

EVALUATION CULTURE AND PROCESS THAT PROVIDE POLICY MAKERS WITH EVIDENCE FOR DECISION MAKING

Global

IPCC, IPBES and international assessments

Cost of inaction / costs of non-compliance studies

Better Regulation and Ambitions Framing

REFITs: Assessments vs political pressure

EU

Impact Assessments (IAs)

EC auditor opinion

Evaluations

General

Impact Studies

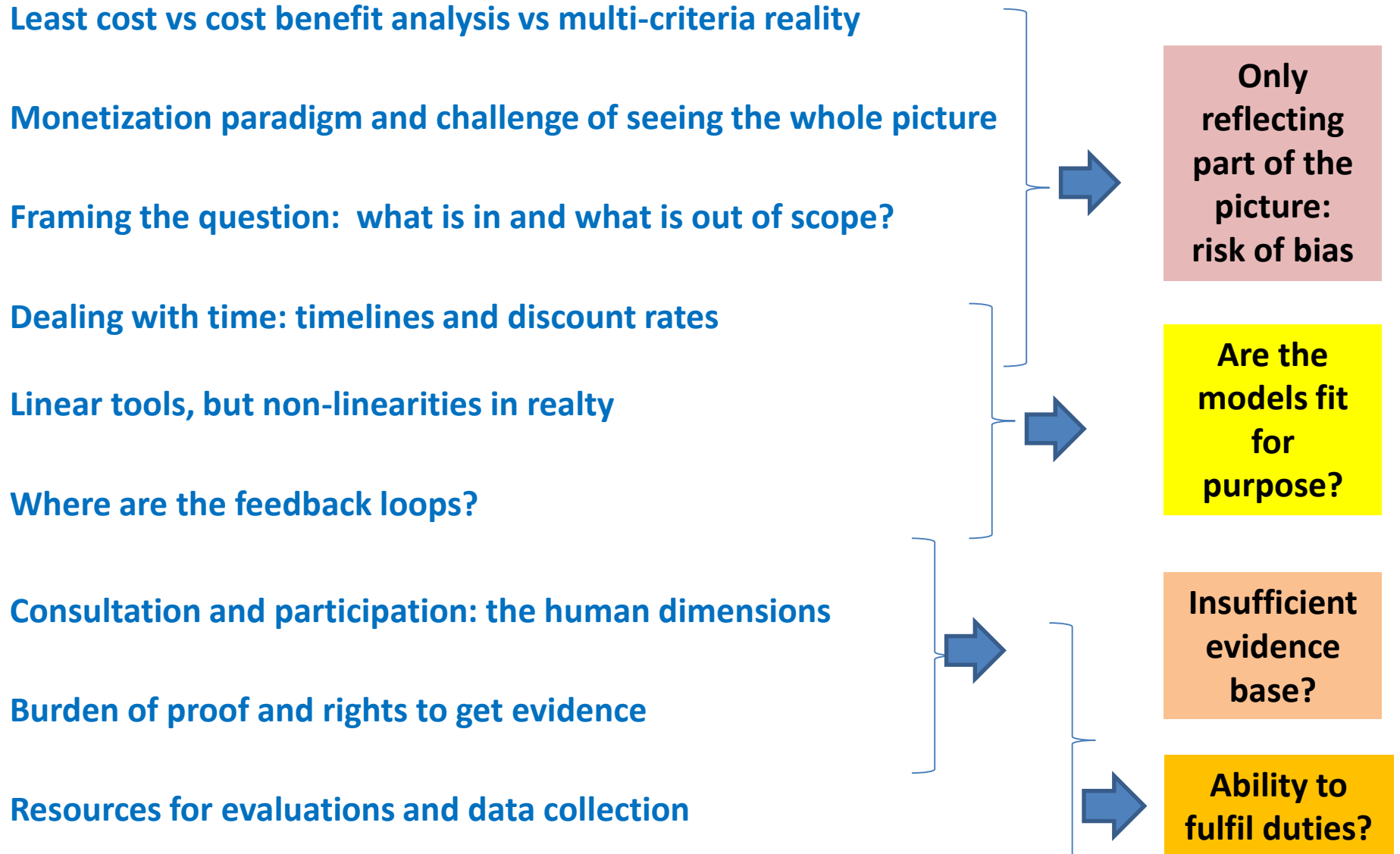
Other processes where CBA is used to inform policy decisions

For examples used to illustrate the points see the Annex



Using and improving these will lead to more and wiser investment in environment and climate policies, their integration, and implementation

EVALUATION TOOLS & CHALLENGES FOR PROVIDING ROBUST EVIDENCE TO POLICY MAKERS



BETTER REGULATION RISKS AND OPPORTUNITIES

Good to have a culture of assessment to understand the impacts of policies

Good to have an evolving toolkit and regularly checking that they are fit-for-purpose

However, current context and culture, framing, tool use and resources, create risks:

- **Overlooking parts of reality / stakeholders**
- **Imbalance between environmental, social and economic elements**
- **Weakening of regulation and weak implementation**
- **Regulatory chill**
- **Deregulation**



Risk of less attention to, and less and poorer targeted investment in, environment and climate policies

WAY FORWARD – PART 1: TOOLS AND APPROACHES

New tools for non-linearities and throw out tools that just don't work

Invest in new models that are fit for purpose

Use CBA and discounting with care and sensitivity

Multi-criteria assessment & multi-cause assessment tools for complex inter-connected reality

Greater use of risk assessment and future proofing and resilience assessment

Adopt metrics that can handle the holistic picture

Systems thinking and systems analysis

Fix the toolkit

Broaden the approach

WAY FORWARD – PART 2: GOVERNANCE

Integrate the likely influence of tools, data, framing, scope, methods on results

Taking risks, non-linearities, feedback loops etc into account requires new thinking

Ensure clear objectives and work out what is needed to reach them, rather than put politically acceptable options on the table and work out which is best

Ensure resources are adequate to address responsibilities and needs: e.g. for policy development, implementation, inspection, infringements, legal cases, enforcement

Engage auditors and ombudsman

Protecting EU citizen's health, rights and the environment: orientate regulation away from short term cost reduction focus towards well wellbeing.



More and wiser investment in environment and climate policies, their integration and implementation



EEB

European
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THANK YOU!

Patrick.tenBrink@eeb.org

www.eeb.org

@Green_Europe

@EuropeanEnvironmentalBureau



eeb@eeb.org

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Annex:

Slides with notes

EEB: WHO WE ARE AND WHAT IS OUR ROLE

Europe's largest network of environmental citizens' organisations:

153 civil society organisations, from **30 European countries**, **all 28 EU MS**,
Representing over **30m EU citizens**

EEB, its members, working groups and coalitions:

- **Input into evaluations:** bringing citizen perspective and expert insights: consultations, expert groups, analysis
- **Comment on evaluation inputs and methods:** e.g. identifying strengths and weaknesses of the system
- **Use the evaluation results** to promote public awareness and policy response and action
- **Recommends ways forward** for “fit-for-purpose” evaluation to address citizen and environmental concerns
- **Fund research and assessments where there are important gaps:** e.g. GHG emissions reductions options for CAP

EVALUATION CULTURE AND PROCESS CSO OBSERVATIONS

IPCC, IPBES and international assessments: warnings of global challenges

Cost of inaction / costs of non-compliance studies: e.g. on non compliance of / non-implementation with, EU law; e.g. UNEPs socio-economics of marine litter

Better Regulation and Ambitions Framing: The focus on reducing burdens on industry and administration is a policy decision that can influence analysis framing, focus and results

REFITs: Assessments vs political pressure: Nature directives; Water F.D.; but no REFIT on CAP

Impact Assessments (IAs): e.g. IAs on Cars and CO₂, CO₂ standards for heavy-duty vehicles, Energy Efficiency Directive; IAs not always proportional (e.g. weak IAs on CAP)

EC auditor opinion: e.g. on CAP to check intervention logic, whether means address objectives

Evaluations: e.g. ongoing 7EAP evaluation; EEA's State of the Environment Reports

Impact Studies: e.g. Health impacts / risks from air pollution, from chemicals – often single factor single impact assessment when “cocktail effect” a reality

Other processes where CBA is used to inform policy decisions: e.g. on authorisations and derogations for harmful substances

EVALUATION TOOLS & ISSUES

Least cost vs cost benefit analysis vs multi-criteria reality

Monetization paradigm and challenge of seeing the whole picture

Framing the question: what is in and what is out of scope?
(e.g. geographic impacts beyond borders)

Dealing with time: timelines and discount rates

Linear tools, but non-linearities in realty

Where are the feedback loops?

Consultation and participation: the human dimensions

Burden of proof and rights to get evidence

Resources for evaluations and data collection

(e.g. authorisations for chemicals designated as harmful under REACH)
(e.g. inspections re potential non compliance)

Only reflecting part of the picture: risk of bias

Are the models fit for purpose?

Insufficient evidence base?

Ability to fulfil duties?

BETTER REGULATION RISKS AND OPPORTUNITIES

Good to have a culture of assessment to understand the impacts of policies

Good to have an evolving toolkit and regularly checking that they are fit-for-purpose

However, current context and culture, framing, tool use and resources, create risks:

- **Overlooking parts of reality / stakeholders:** e.g. future generations, future business, overseas, minorities
- **Imbalance between environmental, social and economic elements:** prioritizing short term econ. costs to business over sustainability: e.g. transport, climate, agriculture, fisheries
- **Weakening of regulation and weak implementation:** e.g. REACH
- **Regulatory chill:** e.g. time taken for reg. action (only now going for HGV CO2); En Tax D
- **Deregulation:** e.g. risks to WFD; risks of one-in-two-out and similar policies

WAY FORWARD – PART 1: TOOLS AND APPROACHES

New tools for non-linearities and throw out tools that just don't work: if a calculator gives you the wrong answer, you wouldn't use it

Invest in new models that are fit for purpose or don't use models that give biased answers + be transparent about any biases

Use CBA and discounting with care and sensitivity: else we ignore too much for conclusions to be valid or just

Multi-criteria assessment & multi-cause assessment tools for complex inter-connected reality

Greater use of risk assessment and future proofing and resilience assessment: if we don't prepare for the future...

Adopt metrics that can handle the holistic picture: e.g. Raworth's "doughnut" of social and planetary boundaries

Systems thinking and systems analysis: if we don't overcome lock-ins, have a just transition to a one-planet economy, we will face ecological, social & econ cataclysms

Fix the toolkit

Broaden the approach

WAY FORWARD – PART 2: GOVERNANCE

Integrate the likely influence of tools, data, framing, scope, methods on results and only use if fit-for-purpose and present results in context

Taking risks, non-linearities, feedback loops etc into account requires new thinking: need not only new tools but a greater use of precautionary principle and future proofing

Ensure clear objectives and work out what is needed to reach them, rather than put politically acceptable options on the table and work out which is best: otherwise we cannot meet global challenges: climate change, biodiversity loss – or even local ones: air pollution

Ensure resources are adequate to address responsibilities and needs: e.g. for policy development, implementation, inspection, infringements, legal cases, enforcement: otherwise we cannot believe in our institutions and the rule of law

Engage auditors and ombudsman to ensure added value and reduce risks of political capture

Protecting EU citizen's health, rights and the environment: orientate regulation away from short term cost reduction focus towards well wellbeing.