The Impact Assessment Board of the European Commission

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First some background
What is Impact Assessment?

- A set of logical steps to structure preparation of a proposal
  - problem -> objectives -> options -> economic, social and environmental impacts -> comparison of options

- Prepares evidence for political decision-makers of the potential impacts of a proposal in a balanced and proportionate way, and identifies possible trade-offs / synergies

- Not a substitute for political judgement!

Overall objectives for the IA system

- Improving quality of proposals
- Providing and effective aid in decision-making
- Enhancing transparency
Background (2)

Why do we do IA?

- Good Governance (mandate for RIA)
  - Promote early coordination and efficiency
  - Opportunities for stakeholder input and enhanced transparency
  - Can simplify and justify EU intervention

- Sustainable Development Strategy (mandate for SIA)
  - Consider impacts of actions on environment, economy, society in a balanced manner
  - Promote policy coherence

- Lisbon Strategy (IA)
  - Simplify and improve the regulatory environment
  - Minimise costs to business of regulation
Evolution of the IA system

- More than 300 IAs during 2003-2007 (102 in 2007)
- IA Board set up Nov. 2006
- External evaluation of IA system completed in May 2007
- Adopted by other institutions
The IA Process

- Roadmaps
- Inter-service Group
- Studies, consultations
- Report submitted to IAB
- IAB Opinion
- Inter Service Consultation (IA + proposal)
- Adoption by Commission (proposal)
- Transmission to Council and Parliament (IA + proposal) and posting on website
The Board
Impact Assessment Board

- Launched by President Baroso on 14 November 2006
- **Independent body** to ensure good quality of the Commission impact assessments
- Main tasks:
  - Assess the IA reports before the Commission adopts proposals they accompany
  - Give quality support for horizontal and methodological aspects
  - Advise if a Commission proposal should be accompanied by an impact assessment
Quality support

- Advice at early stages on individual IAs (roadmaps)
  - Approach
  - Methodology

- In general
  - Input for further development of IA system
Quality control

- ‘End of pipe’ opinion
  - Scrutiny by IAB and discussion at meeting or written procedure
  - Check that the Guidelines have been properly applied
  - Opinion presented to author service and other services
  - Possibility of resubmission request
  - Normally oral examination in front of high-level, well briefed panel
The IAB’s record

- **Number of Board meetings**: 22
- **Total number of IAB opinions**: 112 in 2007 (including resubmissions)
  - *Written procedures*: 51
  - *Oral procedures*: 61
  - *Resubmissions*: 10
  - *Voluntary Resubmissions*: 9
    - So 1 in 5 resubmitted
- **In about 25% of the cases of non environmental proposals, opinions included recommendation to better analyse environmental impacts**
Main fields of recommendations in Board opinions

Board recommendations

Fields of recommendations
What problems keep coming up?

- *Legal base / Subsidiarity / Proportionality*
- Are all sensible options analysed?
- Thread of the analysis, are the options related to the problem (clarity of story)?
- *Depth of analysis in general*
- *Social and environmental impacts in particular*
Conclusion (1)

- Serious assessment of each Impact Assessment
- Incremental ratcheting up of quality of assessment, leading to better proposals
- Has not second guessed policy decisions
- Should help us sell Commission proposals to outside stakeholders
### Conclusion (2)

As regards contribution of IA System to sustainability

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<td>Foster greater policy integration</td>
<td>Still a piecemeal approach</td>
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<td>More rational, evidence based policy making</td>
<td>Limitations of CBA</td>
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<td>Greater inter-departmental collaboration</td>
<td>Short term vs. long term</td>
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<td>Costs and benefits better assessed/quantified</td>
<td>Thinking outside the box?</td>
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<td>Consultation, transparency, accountability</td>
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<td>Has helped adoption of controversial proposals (e.g. REACH, Air Quality Strategy)</td>
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Conclusion (3)

Lessons for those designing their systems

If you want it to work:

- cannot be voluntary, must be a requirement
- must be policed, to check they do it
- police must be authoritative, with high-level backing
- must have help to do it (resources, Guidelines)
- must build on / develop with a culture of analysis
- cannot be seen as biased but integrated, so separate SIA and RIA won't work
- must ultimately help deskofficers (changes 2/3 of our proposals)
Conclusion (4)

A useful tool…

…to be complemented by other instruments (evaluations, consultations, foresight, …)
For further information:

Impact Assessment Board:  
http://ec.europa.eu/governance/impact/iab_en.htm

IA Guidelines:  

Improving Assessment of the Environment in IA:  
http://ec.europa.eu/environment/enveco/others/index.htm#impactassess