

Scrutiny of recent Inception Impact Assessments: adaptation to climate change, organic pollutants in waste, pesticides

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The Impact Assessment Institute has scrutinised three European Commission Inception Impact Assessments (IIAs), published in May 2020, on the European Green Deal strategy for adaptation to climate change, concentration limit values of persistent organic pollutants in waste and revision of the sustainable use of pesticides Directive.

Our analysis according to Better Regulation principles (below) has identified good practice alongside a number of concerns to be addressed in the upcoming Impact Assessment drafting.

Key: **Xx** = no material issues identified; **Yy** = issues identified; **Zz** = significant issues identified

IIA title	<u>European Green Deal Strategy for Adaptation to Climate Change</u>	<u>Update of concentration limit values of persistent organic pollutants in waste</u>	<u>Revision of the sustainable use of pesticides Directive</u>
<i>Context and problem definition</i>	Rationale for amending the 2013 strategy not fully explained; some assertions not backed up by references	Seems to provide a comprehensive overview of current situation and underlying problems	Generally balanced, comprehensive and correctly referring to possible new inputs from evaluation findings
<i>Objective(s) and policy options</i>	Unclear presentation but appears to provide a full overview of the broad objectives and the options under consideration	Presentation of policy options seems appropriate, given the nature of the act, but objectives are not fully specified	Appears to cover full range of measures, with appropriate level of detail for pre-evaluation stage
<i>Assessment of expected impacts</i>	Generally thorough presentation of benefits but no reference to potential costs; impacts on employment not addressed; incoherent reasoning on administrative burdens	Preliminary assessment of impacts appears mostly balanced and relevant, but economic impacts not fully coherent and potential for economic benefits not explored	Generally balanced analysis with suitable level of detail for this stage, but more details on environmental impacts would have been appropriate

<i>Background data and sources</i>	Apparently comprehensive and well-referenced	Apparently comprehensive and well-referenced	Apparently comprehensive, well-referenced and clear
<i>Alignment with Better Regulation guidelines (timeline and procedures)</i>	Narrow time to final act and public consultation held in parallel with IIA feedback period: not aligned with Better Regulation guidelines	Time to legislation (8-10 months) aligned. Absence of dedicated 12-week public consultation, notwithstanding the justification provided, does not comply with guidelines.	Aligned in all aspects