Monitoring and Reporting Obligations arising from EU Environmental Legislation

3rd Stakeholder Workshop on 26-27 September 2016 in Barcelona

26 and 27 September 2016

ICF

Institute for European Environmental Policy

40 YEARS OF VISIONARY RESEARCH

Session 1 – Overview of Monitoring and Reporting Obligations

26th September 2016

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

Institute for European Environmental Policy

40 YEARS OF VISIONARY RESEARCH

0/4/2016   2

Session 1 Agenda

Overview of Monitoring and Reporting Obligations

Presentations followed by questions/ comments

    1400 **Introduction and welcome**

    1410 **Update on the Fitness Check** – European Commission

    1430 **Overview of Reporting Obligations** arising from EU Environmental Legislation – Martin Nesbit, IEEP

    Questions and Discussion

    1510 **Costs and Benefits of Monitoring and Reporting ,** Matt Rayment, ICF

    Questions and Discussion

    1550 **Coffee/Tea break**

Monitoring and reporting obligations arising from EU environmental legislation

ICF proprietary and confidential. Do not copy, distribute, or disclose.

3

Overview of Reporting Obligations arising from EU Environmental Legislation

Martin Nesbit, IEEP

26th September 2016

Monitoring and reporting obligations arising from EU environmental legi
ICF proprietary and confidential. Do not copy, distribute, or disclose.

0/4/2016   4

Screening inventory for reporting obligations in EU environmental legislation

- **The inventory of reporting obligations covers 57 pieces of EU environmental legislation in total.**

  - Based on an initial list provided by the Commission of legislation under DG ENV responsibility;

  - Some were added to the list; others were identified as containing no relevant reporting obligations (e.g. Zoos Directive; Leghold Traps Regulation).

- Inventory covers **reporting obligations in EU legislation which place a legal requirement for an EU Member State (MS) or other party**, including for instance operators from the industry sector, **to transmit information to the European Commission** (including through EEA, JRC and ESTAT).

Figure 1: Information flows under reporting obligations
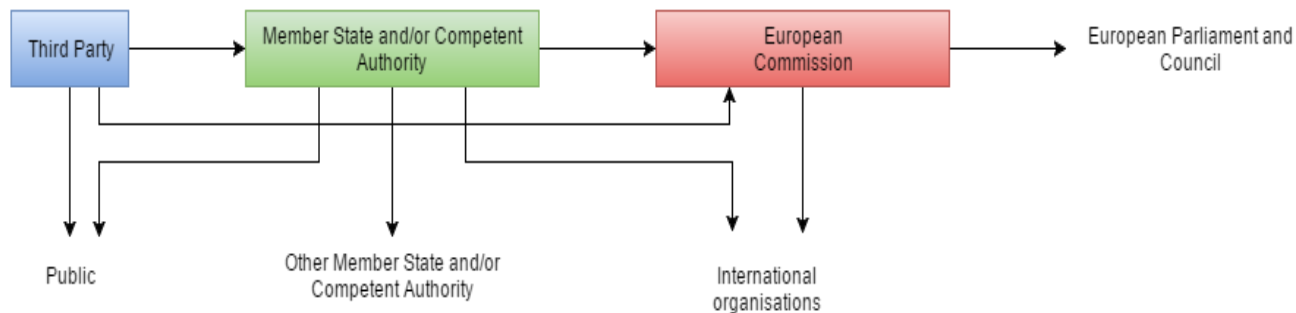
Screening inventory for reporting obligations in EU environmental legislation (continued)

- The following were **not in the scope** of the inventory:
  - Obligations for the European Commission to report, for example to the Council and Parliament (although an important issue for us is the link between reporting obligations for Member States, and subsequent Commission reporting);
  - When there is a reporting obligation (either for the European Commission or the Member States) to provide information to the public;
  - When a Member State is required to provide information to another Member State;
  - The transmission of information where this is part of the regulatory mechanism introduced by the legislation, for example in REACH; and
  - When a third party, including for instance from the industry sector, is required to report to the Member State but this information does not reach the European Commission.
- **In total, 178 reporting obligations were identified.**
  - The full list of the legislation, and the individual obligations identified, are set out in the Excel spreadsheet of the inventory.
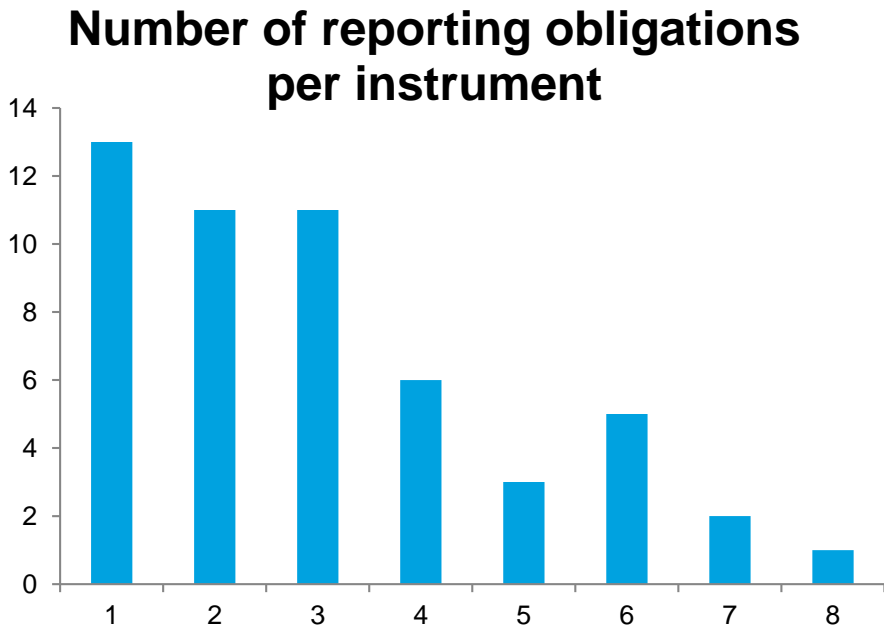
Content of the inventory

- **Information was recorded for each reporting obligation on the following:**
  - Basic information, including short description, link to Eur-Lex text, theme, and identification of the lead unit in DG ENV;
  - Coverage of the DPSIR categories (Driver, Pressure, State, Impact and Response) according to the European Environmental Agency's framework;
  - Type of content;
  - Timing of reporting;
  - Format and process requirements; and
  - Links to third party and public reporting.
- **The inventory is a "living document" which can be subject to revision and amendment.**
  - Further development of the inventory will take place during an additional phase of the research project
  - The inventory will continue to require updating, as legislation changes (both adding or deleting obligations) and as cycles of reporting are completed.

Overview of inventory

- **178 reporting obligations were identified for the 57 pieces of legislation.**

**Number of reporting obligations
per instrument**

Inventory results: media/theme and DPSIR category

Media/theme

Legend:
- Air
- Governance
- Industrial emissions / accidents
- Nature
- Noise
- Products
- Soil
- Waste

Values: 22, 20, 10, 18, 6, 17, 1, 57, 27
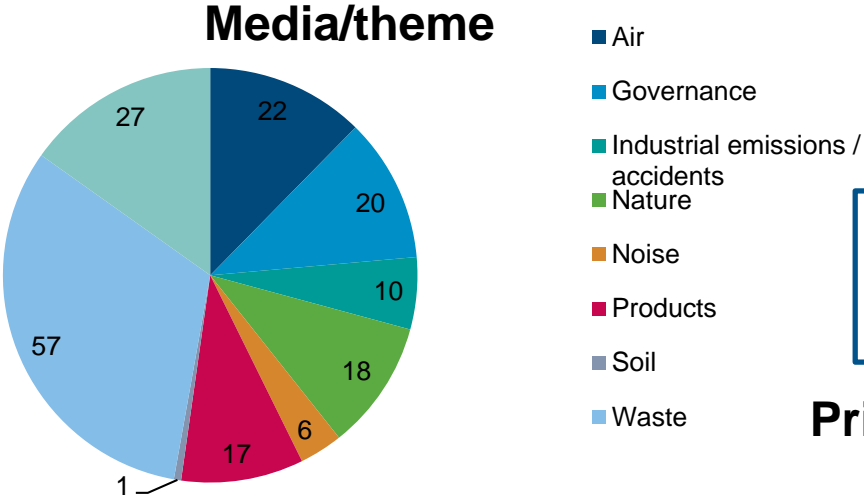
- **Note on media/theme:**
  - Largest category relates to waste, water is second.

Primary DPSIR category

Legend:
- Driver
- Pressure
- State
- Impact
- Response

Values: 0, 23, 30, 5, 119

- **Note on primary DPSIR category:**
  - EEA's DPSIR framework was used.
  - To simplify, for each RO we assigned a primary DPSIR category.
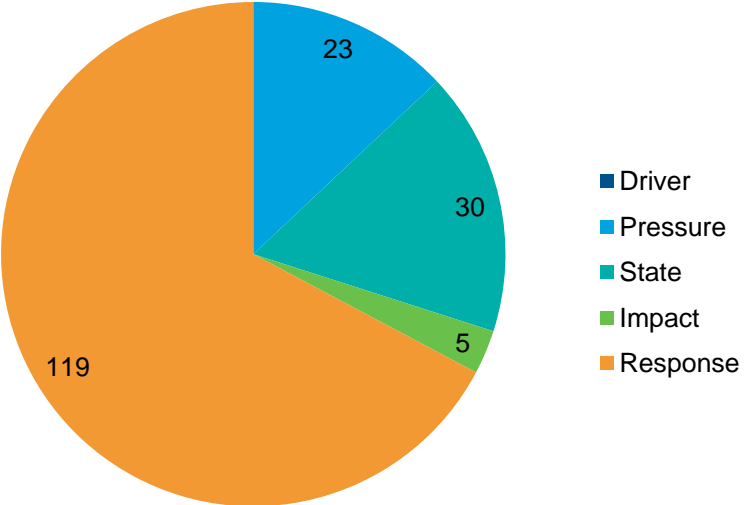
Inventory results: information type and format

Type of information

- Numerical
- Text
- Geospatial

Values shown: 26, 16, 136
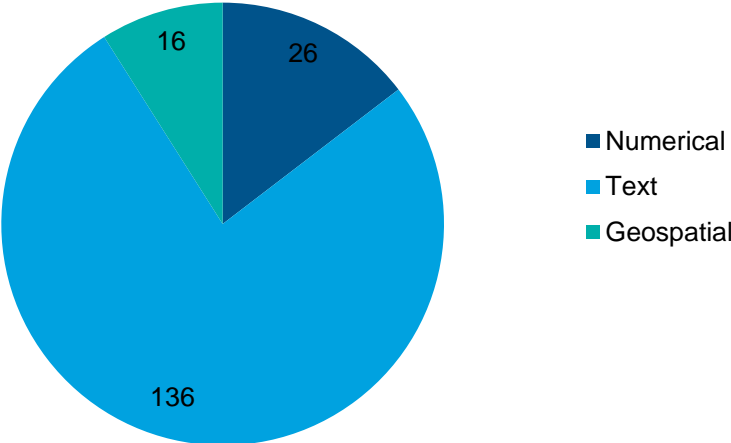
- **Note on type of information:**
  - Reporting in many cases is a mixture of textual, numerical and geospatial information.
  - The figure presents the primary type of information.

- **Note on format requirements:**
  - For the majority there is no format requirement but for some ROs information was not available on this (see 'not indicated')

Format requirements

- None
- Template
- Data input
- Other
- Not indicated

Values shown: 82, 43, 24, 11, 9
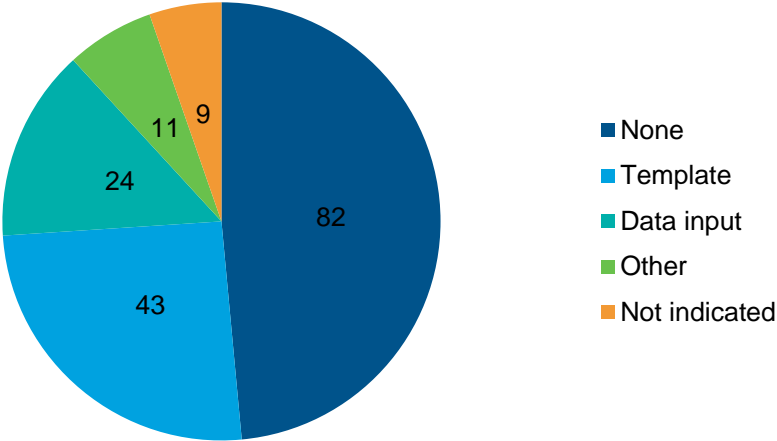
Inventory results: timing of reporting

- **81 ROs** required the Member States to **regularly** report to the Commission while **97** of the ROs were either **one-off or ad-hoc requirements.**

Frequency of reporting

Legend:
- Ad-hoc
- One-off
- Monthly
- Quaterly
- Annual
- Every 2yrs
- Every 3yrs
- Every 4yrs
- Every 5yrs
- Every 6yrs
- Every >6yrs

Values shown: 49, 48, 0, 1, 29, 9, 19, 3, 7, 13, 0
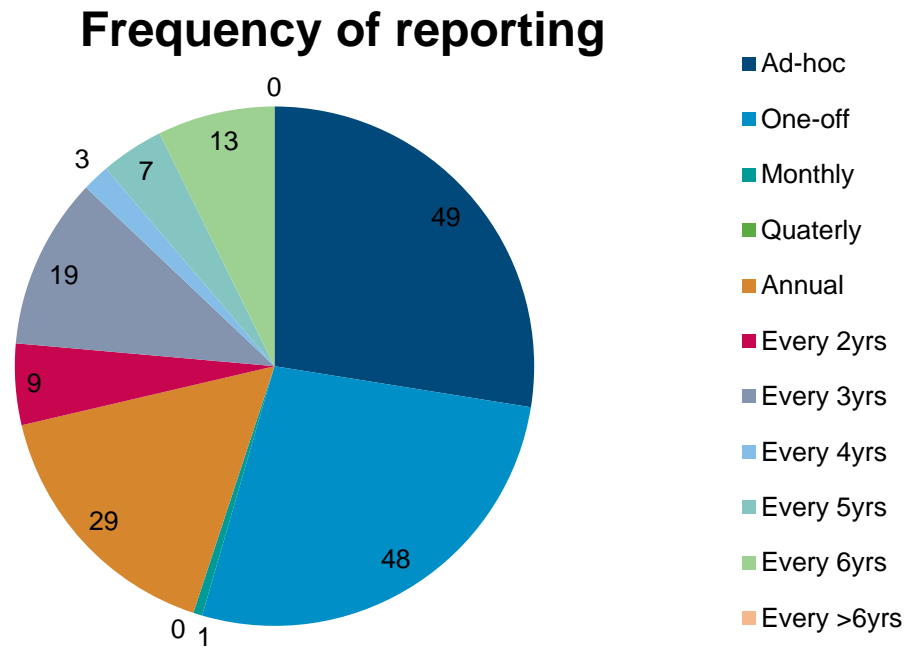
Initial results from the inventory: ROs linked to EC reporting

- In total, **80 ROs are linked to Commission reporting**, i.e. the information that is provided by the Member States are used in a Commission report

- These ROs are primarily linked to 'Response' (47), followed by and 'State' (17), and 'Pressure' (14) under the DPSIR category; and are primarily text-based.

- The largest group of ROs are linked to water, followed by waste issues.

Media/theme of ROs linked to COM reporting

Legend:
- Air
- Governance
- Industrial emissions / accidents
- Nature
- Noise
- Products
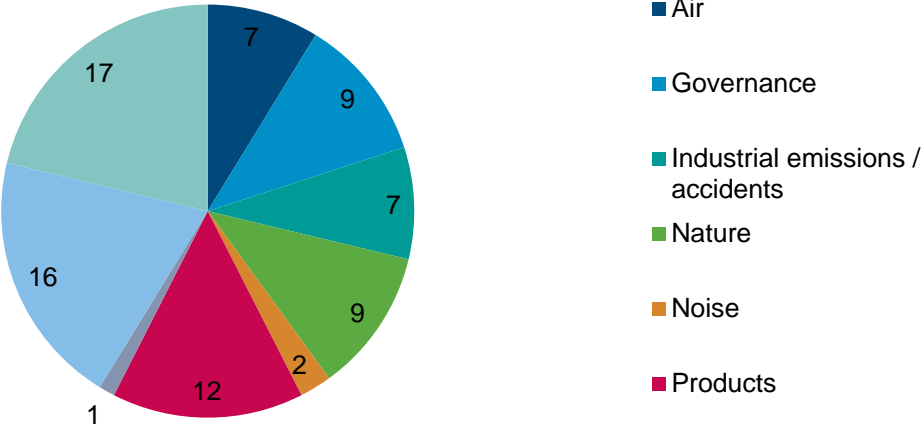
Initial results from the inventory: ROs linked to EC reporting (continued)

- A big difference relates to the frequency of the reporting: the majority of these (66/80) reporting obligations are regular ROs.

Frequency (ROs linked to COM reports)

Legend:
- Ad-hoc
- One-off
- Monthly
- Quaterly
- Annual
- Every 2yrs
- Every 3yrs
- Every 4yrs
- Every 5yrs
- Every 6yrs
- Every >6yrs

Values shown: 0, 5, 9, 0, 0, 20, 7, 19, 3, 6, 11
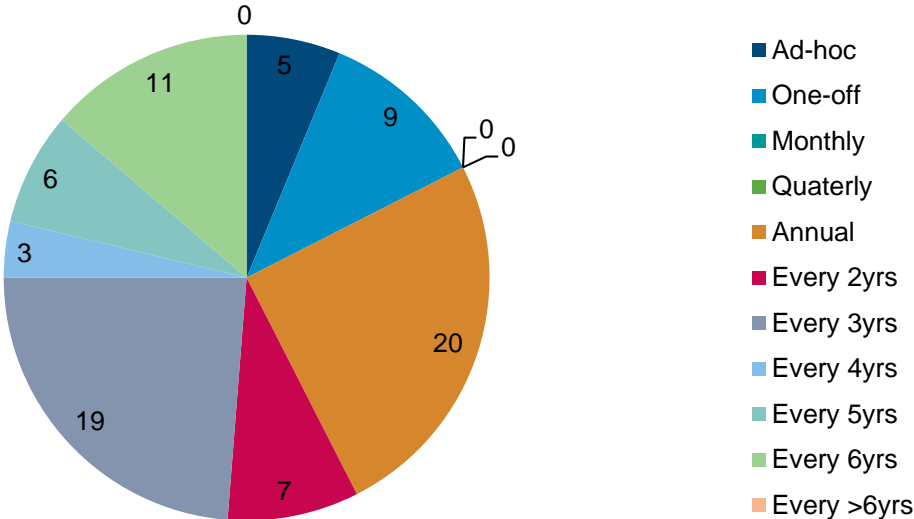
Inventory results: ROs linked to EC reporting (continued)

- For 33 ROs (out of the 78) information was available on the dates of the most recent Commission report and the deadlines of those Member State reports on which these Commission reports were based on. With these figures the number days that elapsed between these two dates were calculated.

- The **average time was 585 days**.

- Caveats: MS reports delayed, complexity of information, additional analysis by EC.

Number of days elapsed between COM report and deadline for MS report
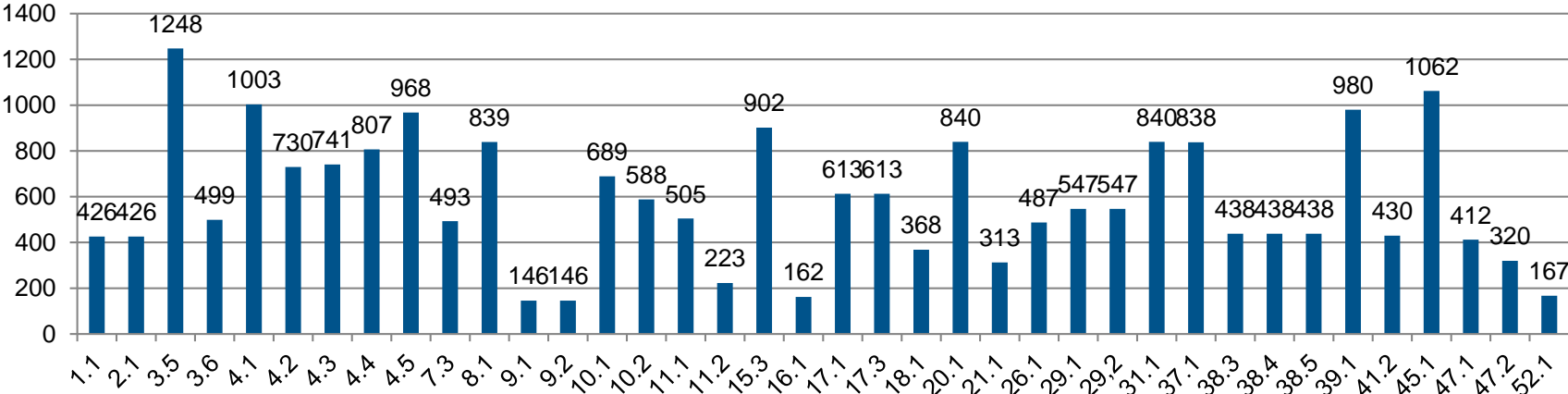
Some initial conclusions

- **Rationale for reporting obligations varies significantly**
  - Generation of information on the state of the environment
  - Assessment of whether the legislation is correctly implemented
  - Linked to specific issues, with review clauses in the legislation
  - Sharing of information, sharing of best practice.

- **Assessment of options for reporting obligations needs a clear understanding of the rationale, and an assessment of whether it still applies, and whether new needs have emerged**

- **Timeliness and value of reporting**
  - Significant delays in use of the information, where linked to Commission reporting
  - A range of reasons and causes for this
  - Regardless of the reasons, leads to reduced value for policymakers and legislators of the reporting which eventually emerges

Inventory development

- **Next steps will be to:**
  - look in more detail at reporting obligations which are set out in secondary legislation;
  - look at links between ROs in EU legislation and those in international agreements – synergies/duplication?
  - Identify additional themes for analysis.
- **In the meantime:**
  - Will continue to update the inventory in response to new information/identification of errors or omissions.

Costs and Benefits of Environmental Monitoring and Reporting

Matt Rayment, ICF

26th September 2016

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   17

Assessing the costs of monitoring and reporting

- **Aim** - to provide an assessment of the costs of administrative burdens from reporting obligations across the full suite of EU environmental legislation

- Screening of the 57 items of legislation in the inventory to provide an overall assessment of their costs

- Build on previous cost estimates in IAs and studies, extrapolating from these where necessary, and gathering further evidence from Commission, EEA and MS

- Assessment uses a common framework, based on Standard Cost Model (SCM) and Better Regulation Guidelines

- The approach needs to be clear and transparent to aid future development and application

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   18

Scope of the assessment

- Standard Cost Model defines 12 types of information obligations (including notifications, labelling, permitting, certification, inspection etc.)

- Focus here is on reporting and related monitoring obligations

- Assessment needs to exclude costs of information required for purposes other than reporting (e.g. permitting, environmental compliance)

- In many cases information reported has been collected for other reasons (e.g. to define the need for action, achieve compliance)

- Key question is whether the information would need to be collected, processed, shared if there was no EU reporting obligation

- We need to understand the added cost of the reporting obligation, i.e. the administrative burden of reporting

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   19

Elements of the cost assessment

Costs of monitoring and reporting comprise:

- Administrative costs incurred by reporting entities (businesses, MS, EC)
- Systems costs (e.g. equipment and IT)
- Outsourcing costs/ fees

Standard Cost Model: Administrative costs = Σ P x Q

Where:

P (for Price) = Tariff x Time

Q (for Quantity) = Number of entities x Frequency

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   20

Approach to cost assessment

1. Analysis of individual items of legislation
   - Build on Task 1 inventory and understand ROs, processes, obliged entities
   - Review existing evidence
   - Define cost equations and parameters as far as possible
   - Assess overall magnitude of costs, quantifying as far as possible
   - Identify purpose and benefits of the RO
   - Identify any steps taken to reduce burdens of reporting
2. Preliminary analysis across legislation
   - Semi quantitative assessment of overall magnitude of burdens, grouping and categorising different items of legislation
   - First assessment of overall scale, and relative burdens of different legislation
3. Targeted, more detailed assessment
   - Targeted, prioritised research to fill data gaps
   - Focusing on four themes: air and noise, industrial emissions, waste, water

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   21

Initial findings on costs

- Costs of reporting are small as a proportion of overall administrative burden of environmental legislation

- Costs vary widely – many items of legislation have small or zero costs, while a few have significant costs

- Most reporting obligations place burdens on MS and the Commission only, limiting burdens involved. Those placing obligations on business have larger costs by increasing numbers of reporting entities (Packaging Waste, WEEE)

- Investment in IT and systems development (e.g. for air quality) can result in significant short term costs but reduce administrative burdens in long term

- For some legislation (e.g. WFD), overall (voluntary) costs of reporting greatly exceed burdens placed by legal obligations

- In some cases, a large proportion of burdens result from international rather than EU obligations (e.g EPRTR)

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   22

Type	Approximate annual administrative burden attributable to Ros	Incidence of burden	Items of legislation falling into this category
Regular reporting with direct obligation for large numbers of businesses/ operators as well as MS authorities	Large More than EUR 1 million p.a.	Business, MS, EC	Packaging Waste Directive (31), WEEE Directive (34)
Regular reporting by MS of very detailed and extensive information that should already be available but require significant time to compile	Fairly large EUR 100,000 to 1 million p.a.	MS, EC	Ambient Air Quality Directive (1)**; Arsenic, cadmium, mercury, nickel and PAH in ambient air (2)**; Environmental Noise Directive (3), Water Framework Directive (4)*, MSFD (7), Drinking Water Directive (8), Habitats Directive (10), Birds Directive (11), EPRTR Regulation (13), Industrial Emissions Directive (14); National Emissions Ceilings Directive (16), Urban WW Treatment Directive (17), Nitrates Directive (18), EMAS Regulation (19), Landfill Directive (20), Mining Waste Directive (21), Waste Framework Directive (27), Waste Shipments Regulation (29), Batteries and Accumulators Directive (30), End of Life Vehicles Directive (33), REACH Regulation (39), INSPIRE Directive (45), Regulation on Trade in Wild Fauna and Flora (47), FLEGT Regulation (51), Timber Market Regulation (52)
Reporting by MS of detailed information that should already be available	Moderate EUR 30,000 – 100,000 p.a.	MS, EC	EQS Directive (5), Floods Directive (6), Bathing Water Directive (9), Habitats Directive (9), IAS Regulation (12), Sulphur content of liquid fuels Directive (15), VOC emissions Directive (22), Fracking Recommendation (25), Sewage Sludge Directive (26), Mercury Regulation (36), VOCs Directive (37), CLP regulation (40), EIA Directive (43), SEA Directive (44), Access and Benefits Sharing Regulation (50), Ship Recycling Regulation (53), Medium Combustion Plant Directive (54), Asbestos Directive (56)

Regular or ad hoc reporting by MS of a limited amount of available information; or more detailed information by EC only	Small Zero – 30,000 p.a.	MS, EC	Petrol vapour recovery Directive (23), Seveso Directive (24), Ecolabelling Regulation (28), RoHS Directive (35), POPs Regulation (38), Regulation on Export and Import of Hazardous Chemicals (41), Regulation on Trade in Seal Products (55), EEA/ EIONET Regulation (57)
No further reporting required	Zero	-	PCBs Directive (32), Environmental Liability Directive (42), Directive on Public Access to Environmental Information (46), Regulation on Imports of Whale Products (48), Regulation on Trade in Seal Skins (49)

Caveats and next steps

- Estimates are sensitive to methodology and assumptions:
  - Definition of reporting obligations
  - Estimates of time required
  - Tariff rate applied per day
- Assessment provides first, rough order of magnitude estimates
- Costs need to be considered alongside benefits of reporting
- We will refine the approach based on further discussions with EC, EEA and stakeholders
- We would welcome your comments on the methodology and preliminary findings

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   25

Benefits of Reporting Obligations

- Regulatory monitoring and reporting provide vital information that supports implementation, monitoring and review of environmental legislation

- Benefits and costs both need to be considered in assessing potential options for change

- Costs can be relatively easily quantified, using standard cost model, but benefits of reporting are difficult to quantify:
  - Reporting delivers benefits indirectly, by enhancing implementation of legislation over time
  - Benefits are realised through enhanced environmental effects, which are hard to value

- The scoping analysis and fiches examine benefits as well as costs:
  - All ROs were introduced with a clear purpose, and most deliver the benefits intended
  - Benefits vary between ROs – some provide vital administrative details, others give detailed information to guide implementation and review, or inform the public
  - Some ROs have been less beneficial than envisaged, e.g. due to incomplete reporting, data gaps and inconsistencies, quality issues
  - Steps have been taken to repeal or update ROs found to be less beneficial

Monitoring and reporting obligations arising from EU environmental legislation

ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   26

Session 2 – Discussion on the Current System of Monitoring and Reporting

26th September 2016

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   27

Session 2 Agenda

Discussion on the Current System of Monitoring and Reporting

Structured discussion session, chaired by consultants with short presentations to introduce topic and discussion questions.

1610: Improving the system of Monitoring and Reporting – Principles, Objectives and Evaluation Criteria. Rupert Haines, ICF

1620: Relevance of current monitoring and reporting arrangements

1650: Effectiveness of current monitoring and reporting arrangements

1720: Efficiency of current monitoring and reporting arrangements

Member State Perspective - Wim van der Maas, RIVM, Netherlands

1800: Close

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   28

Improving the system of Monitoring and Reporting – Principles, Objectives and Evaluation Criteria

- **Purpose of the fitness check:**
  - Are reporting obligations fit for purpose?
  - What actions can be taken to improve?

- **To respond to this, five evaluation criteria are used to explore the system from different angles:**
  - Relevance
  - Effectiveness
  - Efficiency
  - Coherence
  - EU added value

- **The objectives and principles of monitoring and reporting provide the context that enable application and interpretation of these criteria.**

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   29

Objectives of reporting

A. Demonstrate compliance with legal obligations

B. Determine if the objectives of legislation are being achieved effectively and efficiently, including, where appropriate, ensuring a level playing field of the internal market

C. Inform the other EU institutions as well as the public and stakeholders at EU level on the progress of implementation and the identification of gaps:

D. Help inform the understanding of an environmental issue and so help to improve decision making, e.g. policy evaluations or impact assessments:

E. Identify and spread good practices amongst Member States

Source: Based on Better Regulation Guidelines

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   30

Objectives of reporting: stakeholder viewpoints

A: It should allow for an assessment of whether EU legal obligations are being met

D: It should allow stakeholders to understand the state of the environment and the actions taken to maintain and improve it

C: It should generate reliable environmental information and ensure access to environmental information for citizens

E: It should allow comparison between Member States as regards their performance when implementing EU environment law

B: It should indicate how well the legislation is working (i.e. costs and benefits)

■ Mean score (10 = high; 0 = low)

Source: Environmental Monitoring and Reporting Fitness Chec Public Consultation

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   31

Principles of reporting

A. Comprehensive:

    i. Provide data that is sufficiently detailed to inform monitoring, evaluation and decision making.

    ii. Provide data that cover the objectives of the intervention and should provide evidence on both the costs and benefits of the legislation.

    iii. Can include objective (e.g. factual, quantitative) and subjective (e.g. opinion, qualitative) evidence.

B. Proportionate:

    i. A balance between the extent of information requested and cost of its provision.

    ii. Weight of evidence reflects the importance placed on different aspects of the intervention.

C. Minimise overlap:

    i. Does not duplicate requirements already in place. New reporting obligations focus on gaps.

    ii. Information collected once and shared for many purposes.

D. Timeliness:

    i. Timing of reporting aligns with when evidence will be used.

    ii. Provide data that is up-to-date at the point of use.
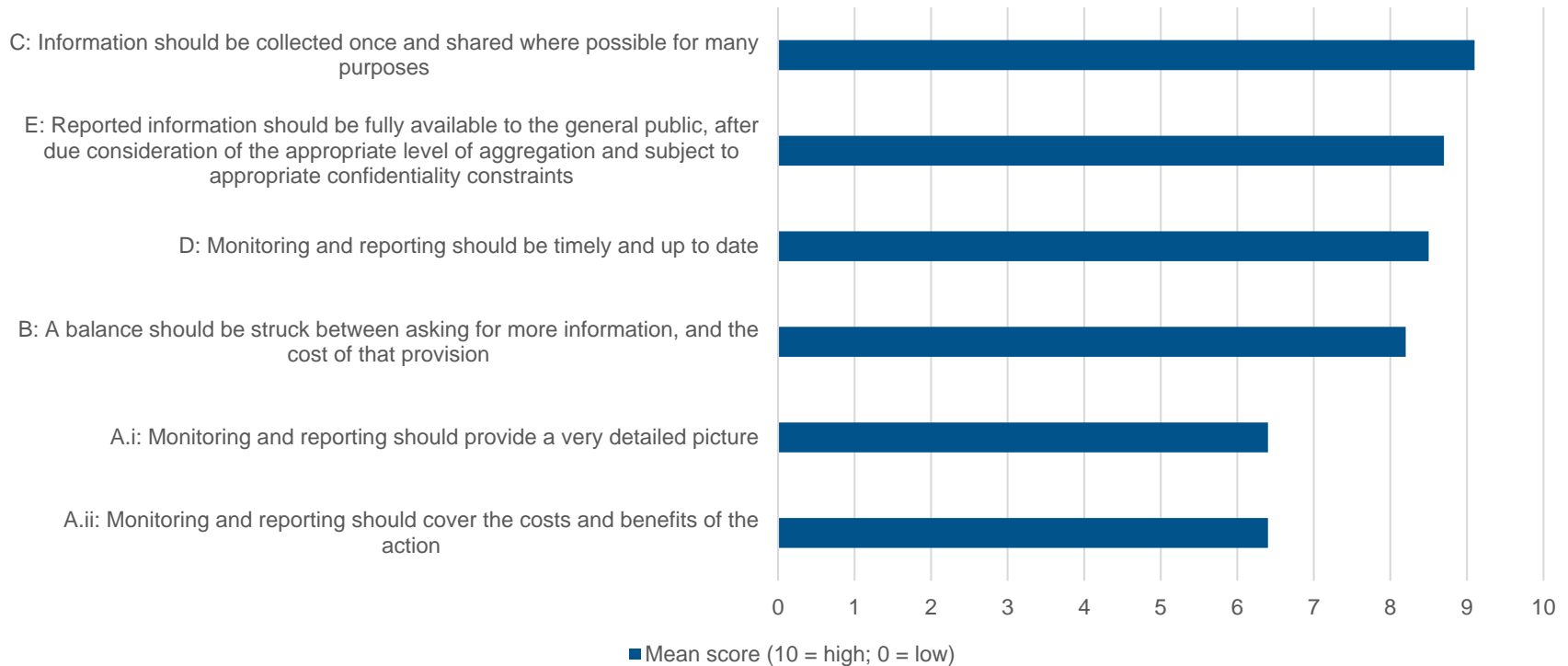
E. Accessibility:

    i. All evidence gathered made available to the general public (subject to appropriate aggregation and confidentiality constraints).

Source: Based on Better Regulation Guidelines

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   32

Principles of reporting: stakeholder viewpoints

C: Information should be collected once and shared where possible for many purposes

E: Reported information should be fully available to the general public, after due consideration of the appropriate level of aggregation and subject to appropriate confidentiality constraints

D: Monitoring and reporting should be timely and up to date

B: A balance should be struck between asking for more information, and the cost of that provision

A.i: Monitoring and reporting should provide a very detailed picture

A.ii: Monitoring and reporting should cover the costs and benefits of the action

■ Mean score (10 = high; 0 = low)

Source: Environmental Monitoring and Reporting Fitness Check Public Consultation

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   33

Relevance of current monitoring and reporting arrangements

- Relevance is concerned with whether:
  - the **objectives** of the reporting system remain **relevant to the needs** they are trying to address.
  - the **overall system** remains **relevant to the current situation**.

- The evaluation questions:
  - Are environmental reporting requirements relevant for assessing progress with **Key Performance Indicators** (building on the indicators system introduced by the Better Regulation Guidelines)?
  - Has the process of reporting taken advantage of **technology**: including advances in IT, increasing provision of data through Copernicus, etc?
  - Does the process of reporting remain relevant compared to **alternative methods** of sharing information i.e. harvesting of data?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   34

Relevance of current monitoring and reporting arrangements

- Relevance of KPIs
  - Do environmental reporting obligations provide the data necessary for constructing KPIs? Could KPIs reduce reporting data needs?
  - In which specific legislation / groups of legislation might adoption of KPIs be relevant?

- Taking advantage of technology
  - Any examples of technology-solutions and the benefits they have brought for reporting?
  - What technologies could be more widely used and in which areas? What costs and challenges might this bring?

- Alternative methods
  - Is data harvesting already occurring? What are the costs, challenges and benefits?
  - Are their ideas for areas of legislation / specific reporting obligations where data harvesting be appropriate?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   35

Effectiveness of current monitoring and reporting arrangements

- **Effectiveness** concerns the system of monitoring and reporting's **performance against its objectives**

- **The evaluation questions**
  - Does environmental reporting provide sufficient **information on the state and the effectiveness of implementation**? i.e. does it satisfy the objectives of reporting?
  - **Are reporting obligations satisfied**? Is the quality and timeliness of data good?
  - Does environmental reporting **allow for evidence based decision making** including evaluations of regulatory fitness and impact assessments?
  - Does environmental monitoring and reporting **allow for the public to be properly informed** about the state of the environment? Is the information received publically accessible?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   36

Effectiveness of current monitoring and reporting arrangements

- **Are there examples where the available reported information is insufficient (or at least suboptimal) to enable a satisfactory evaluation of implementation or impact?**
  - Are there examples of ROs informing impact assessment and evaluations? Was the information sufficient? If not, why not?

- **Why is reported information insufficient?**
  - Are there examples of legislation / ROs where data submission is: regularly delayed, has an excessively long timeframe, doesn't meet end user needs, produces inconsistent data or data errors? What were/are the causes?
  - Are there examples of where timeliness / quality has been improved? How? Could such improvements be made elsewhere?

- **Is sufficient information on the state of the environment made available to the public? Is the information accessible, comprehensible and meaningful to the public**

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   37

Efficiency of current monitoring and reporting arrangements

- **Efficiency** is concerned with the achievement of monitoring and reporting objectives at **minimum cost** and whether the **benefits outweigh the costs** of achieving them

- **Evaluation questions**
  - What are the **costs** of reporting? **Are they justified and proportionate** compared to the benefits?
  - What **factors influence the costs** of reporting and the efficiency of reporting processes?
  - Are there national or regional **best practices examples** that can reduce costs?
  - Could **improvements** be made to the reporting process that reduce costs?
  - Could the timing of reporting be **better synchronized** to reduce costs?
  - Could the costs of reporting be reduced through promotion of **active dissemination** of information (in the context of Directives 2003/4/EC and 2007/2/EC), whilst improving access for public authorities, businesses and citizens?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   38

Efficiency of current monitoring and reporting arrangements

- **Are there examples of where the costs are thought to be disproportionate to the benefits?**
  - Why is this? What key factors drive costs / inefficiencies?

- **What possible improvements could be made that reduce costs?**
  - Any known best practices examples that can reduce costs? What did they influence? Are they transferable?
  - Any specific suggestions for improvements? How would these affect costs?
  - Are there opportunities for better synchronization of reporting within or across legislation to reduce costs?
  - Could the costs of reporting be reduced through promotion of active dissemination?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   39

INSPIRE and EU-reporting

The long and winding road to map your reporting obligations

A member state perspective from the Netherlands

National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

Contents

1. **Avoidable burden in EU reporting obligations**

2. **2020: your data mapped to the INSPIRE data-model?**

3. **Way forward**

Avoidable burden in EU reporting obligations:

1. Inconsistencies in definitions and categorisations

2. Double reporting

3. Request of already available information

4. Different Tooling

5. Non mandatory items

6. Inconsistent timing

Can INSPIRE hand us solutions?

Mapping of data to a new datamodel

❌ **the new UNFCCC CRF-reporter**

- **80.000 datalinks mapped into a 10 dimensional cube**
- **For every country resource intensive (including the EEA)**
- **All Kyoto, EU-MM reporting postponed for more than 7 months**

❌→✅ **the Air Quality Directive**

- **Life feed mapped to the INSPIRE datamodel**
- **Despite centralized approach and help form the EEA a big effort.**
- **Only a marginal part of the INSPIRE data model is used**

✅ **Integration of reporting on facility level (E-PRTR, LCP, IED)**

- **Only the administrative part of the facilities**
- **Not enough ambition**

Way forward

- **INSPIRE ICT community and reporting community: two worlds**

- **They meet each other in the data-model**

- **Worst scenario: every country does its own mapping**

- **Map all the data to the INSPIRE model and harmonize the categorizations**

- **Tooling of the EEA: a possibility to bring the worlds together**

- **This result can be easily implemented in the MS**

- **Have always INSPIRE on he agenda in the technical committees**

- **Have more back to back meetings with the different EU obligations** *E-PRTR/UWWTP/ETS/IED Waste EU/EUROSTAT EU-MM/NEC*

Map all EU-reporting obligations to the INSPIRE data model

Session 3 – Discussion on the Current System of Monitoring and Reporting

27th September 2016

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   45

Session 3 Agenda

Discussion on the Current System of Monitoring and Reporting

Structured discussion session, chaired by consultants with short presentations to introduce topic and discussion questions.

0900: Coherence of current monitoring and reporting arrangements

0930: EU added value of current monitoring and reporting arrangements

0950: Possible options for change - How can the content, timing and process of reporting be improved?

1020: Next steps and concluding remarks – European Commission

1030: End of Workshop

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   46

Coherence of current monitoring and reporting arrangements

- **Coherence** examines the **consistency** of reporting obligations with each other and with wider requirements, including international commitments, and the degree to which there may be **overlapping or possibly conflicting** requirements within the system

- **Evaluation questions**
  - Is some data reported multiple times, when it could be reported once and then used for multiple purposes?
  - Is data reported (including to other parts of the Commission) but then full use not made of it?
  - Is there coherence between reporting to the EU level and to other international levels?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   47

Coherence of current monitoring and reporting arrangements

- **Are there examples where the same data is reported multiple times? What changes would be required to avoid these overlaps?**

- **Are there examples where data could have use beyond its immediate purpose / EU unit/department, but this is not occurring? What are the reasons why full use may not be being made of reported data across organisations / departments?**

- **Are there examples of incoherence between EU and international reporting? In what ways does this occur? Would it be beneficial to improve coherence in such situations?**

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   48

EU added value of current monitoring and reporting arrangements

- **EU added value** examines the **benefits of reporting at EU level** rather than at Member State level, and considers the **consequences of removing EU level** reporting obligations

- **Evaluation questions**
  - What are the benefits of reporting at the EU level, compared to local or national levels?
  - What would be the consequence of a cessation of EU level reporting and replacing them by increased transparency and active dissemination?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   49

EU added value of current monitoring and reporting arrangements

- What is the benefit of defining and administering reporting obligations at an EU level?

- Are there specific situations where EU level reporting does or does not provide clear benefit?

- What advantages and disadvantages would cessation of EU level reporting and replacement with increased transparency and active dissemination bring?

- In what situations might this occur? Are there any real examples of these at present?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   50

Possible options for change

- The system for regulatory monitoring and reporting is changing over time
- Implementation of existing ROs has improved through changes in reporting processes (including new technologies), format, content, timing
- Policy developments have led to proposals to amend, reform or repeal ROs:
  - Circular Economy package
  - REFITs (e.g. EPRTR, INSPIRE)
  - Proposed repeal of Standardised Reporting Directive
- Fitness Check of monitoring and reporting is considering opportunities to go beyond current proposals, to improve current system in terms of content, process and timing

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.

10/4/2016   51

Options for change – Questions for discussion

- What changes could be implemented to improve the implementation of existing reporting obligations?

- What are the most promising opportunities for current policy reviews to enhance the effectiveness and efficiency of monitoring and reporting?

- Is there scope to harmonise and streamline existing reporting obligations, and/or to reduce overlaps, without reducing the effectiveness of reporting?

- What further changes could be considered to the timing, content and process of reporting?

- How would the above changes enhance the benefits, and/or reduce the costs of reporting?

Monitoring and reporting obligations arising from EU environmental legislation
ICF proprietary and confidential. Do not copy, distribute, or disclose.
10/4/2016   52

Thank you for participating!