



Streamlining monitoring and reporting obligations in environment policy

Fields marked with * are mandatory.

1. Introduction

The Commission [1] is launching a broad review of reporting requirements under several of its policies, including in the environmental field. A Fitness Check will deliver this commitment in the environmental area, to which you will also have the opportunity to provide feedback.

What is a Fitness Check?

A Fitness Check is an evaluation of an individual measure, but that covers a group of measures which have some relationship with each other (such as the common issue of reporting). Fitness Checks can look at several pieces of legislation either in their entirety or a horizontal aspect common across a wide range of legislation and policy. Fitness checks are particularly well-suited to identify overlaps, inconsistencies, synergies and the cumulative impacts of regulation.

Fitness Checks are a tool used to implement the Commission's Regulatory Fitness and Performance programme (REFIT): a rolling programme to keep the entire stock of EU legislation under review and ensure that it is 'fit for purpose', that regulatory burdens are minimised and that all simplification options are identified and applied.

Monitoring and reporting is essential for the Commission to check that environmental policy is being implemented on the ground and to make sure that the EU institutions and the European citizens are informed about the quality of the environment and the action taken to maintain and improve it.

Monitoring refers to measurements, observations or other means to create data and information for the purpose of surveillance or control. A monitoring system helps:

- to identify whether a policy is being applied on the ground as expected;
- to address any implementation problems of an intervention; and/or
- to identify whether further action is required to ensure that it can achieve its intended objectives.

Environmental reporting is the provision of environmental information by businesses, public administrations, other organisations, and citizens. More specifically this can be information:

- to demonstrate compliance (eg Member State reporting to the Commission);
- to secure compliance (eg amounts of waste shipped, emission levels, etc);
- to rectify situations of non-compliance (e.g. action plan, planned investment in infrastructure, etc.);
- provided to statistical offices as input to local, national or European statistics;
- provided to the public, customers or other stakeholder groups in the interest of transparency;
- provided to obtain a permit to carry out an activity.

What do people report on?

- state of the environment (eg air limit values, water status, etc);
- emissions (eg under European Pollutant Release and Transfer Register);
- pressures (eg under Marine Strategy Framework Directive);
- individual measures (eg under Nitrates Directive);
- plans and programmes (eg air quality management plans, river basin management plans, etc);
- market surveillance (eg under REACH[2]);
- costs and benefits of the actions.

This Fitness Check aims at ensuring that environmental monitoring and reporting is fit for purpose: delivering the right information, at the right time and in an efficient way. It is likely to identify some additional information that is required, but also some existing reporting requirements that can be scaled back or met in a more efficient (less burdensome) manner.

Indeed, the Fitness Check will identify where requirements could be simplified in terms of scope, details, frequency and timing of the reporting. It will detect possible synergies across reporting obligations as well as modernisation of the reporting tools and solutions, lowering administrative burdens for Member States; benefits which can then be passed on to businesses and citizens.

The Fitness Check will require an understanding of:

- the **timing** (when reporting takes place): is it at the right time for policy needs? is the timing coherent across different pieces of legislation?
- the **process** (how reporting process is organised): is full use of e-reporting being made? is the process of validating data properly done?
- and the **content** (what is reported and why): is all the information that is asked for needed? is all the information needed asked for?

This Fitness Check takes the form of a **rolling programme**. There are already ongoing actions in many areas which will be pursued without delay, such as on the implementation of the [INSPIRE Directive](#)[3] on the basis of its' ongoing evaluation and a proposal for a repeal of the Standardised Reporting Directive[4]. Moreover, results and changes to reporting requirements might take place as and when they are identified, e.g. in the upcoming proposal on the Circular Economy and as a result of the follow up to this Fitness Check.

The results of the Fitness Check on monitoring and reporting should be ready for presentation in 2017, after which subsequent additional actions may be identified. In terms of scope it will:

- include monitoring as this is the way in which we generate the information that is then reported;
- cover the whole environmental acquis;

- also consider the impact of changes at the EU level on the organisation at local, regional and national level. As far as possible, good practices will be identified at all levels, to identify potential ways to improve the efficiency, effectiveness and coherence of reporting;
- consider reporting from the Commission to the other EU institutions and the way in which we use EU reporting as input to international fora and conventions.

Input from stakeholders and the public will be central to this work. The objective of this consultation is to help the Commission to:

1. validate the principles such as proportionality, accessibility, relevance... that it should use for assessing environmental reporting requirements;
2. gather views regarding whether reporting requirements are in line with those principles – in this respect, examples will be particularly welcome;
3. gather evidence on current shortcomings, overlaps and potential improvements that should be examined during the process.

The responses gathered will be summarised, and they will feed into the process.

[1] [COM\(2015\)215](#).

[2] Registration, Evaluation, Authorisation and Restriction of Chemicals.

[3] (2007/2/EC).

[4] (91/692/EEC).

2. General information about respondents

★ 2.1 Who are you?

- | | |
|---|---|
| <input type="radio"/> As an individual / private person | <input type="radio"/> Academic/research institution |
| <input type="radio"/> Civil society organisation | <input type="radio"/> Private enterprise |
| <input checked="" type="radio"/> Public authority | <input type="radio"/> International organisation |
| <input type="radio"/> Professional organisation | <input type="radio"/> Other |

If you are a legal entity and you are not registered in the [Transparency Register](#), please do so before answering this questionnaire. If your entity responds without being registered, the Commission will consider its input as that of an individual/private person and as such, will publish it separately.

★ 2.2. Please give your country of residence/establishment

Netherlands



Other, please specify below

200 character(s) maximum

★ 2.3. Please indicate your preference for the publication of your response on the Commission's website:

- ☒ Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
- ☐ Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
- ☐ Not at all — please keep my contribution confidential (it will not be published, but will be used internally within the Commission). Note that in this case your contribution may still be subject to requests for 'access to documents' under Regulation 1049/2001[1]

[1] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

★ 2.4. Please give your name if replying as an individual/private person, otherwise give the name of your organisation

200 character(s) maximum

The Netherlands

2.5. Please provide your email address if you would like to be informed of the outcome of this consultation

200 character(s) maximum

3. General principles and objectives related to monitoring and reporting of the environmental acquis

Evaluation criteria

All evaluations and Fitness Checks consider five key criteria:

1. How relevant is the EU intervention – do the original objectives still correspond to current needs?
2. How efficient has the EU intervention been - are the costs proportionate to the benefits achieved?
3. How effective has the EU intervention been - have the objectives been achieved?
4. How coherent is the EU intervention internally and with other (EU) actions – are there synergies or inconsistencies between actions?
5. What is the EU added value of the intervention - compared to what could be achieved by Member States at national and/or regional levels?

Evaluation criterion: Relevance

When assessing any individual reporting requirement and the monitoring that reporting requirement triggers, it helps to have an agreed set of principles for their assessment and to understand why reporting is in place.

3.1 Overall impression

On the whole, are you satisfied, fairly satisfied, not very satisfied or not at all satisfied with environmental Monitoring and Reporting requirements?

- ☐ Satisfied
- ☐ Fairly satisfied
- ☒ Not very satisfied
- ☐ Not at all satisfied

If you are not satisfied, could you give the reason(s)?

1000 character(s) maximum

Noise: No room for small deviations in the reporting mechanisms. NL wants to report for all major roads because the threshold of >3 million vehicle passages/year is exceeded on 90% of these roads. However this is not allowed. Limited comparability of MS reports due to the fact that various national calculation methods may be used. The EU harmonised method CNOSSOS will be an improvement, nevertheless the quality of input data and its impact on the data reported to the Commission is a risk still not addressed/solved.

Air: Much of the requested info is not obligatory. Consequence: not usable info and lots of ballast.

Birds/Habitat: Currently a useful dialogue on what info the Commission can use, rather than what info the Commission would like to have.

Water: A comprehensive discussion on the formats took place. Including MSs in the discussion is positive, but there is still room for improvement. The discussion has been time consuming. The format should have been ready 1,5 year earlier.

3.2 Overall perception

Please choose the environmental policy area(s) for which you are familiar with the Monitoring and Reporting requirements.

- ☒ Air quality and pollution
- ☒ Biodiversity and nature
- ☒ Chemicals
- ☒ Natural resources
- ☒ Noise
- ☒ Soil
- ☒ Waste
- ☒ Water

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question

3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: AIR QUALITY AND POLLUTION. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☒ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

Also too little more is needed.
See Specific Comments under point 6.

4.2. Efficiency

You declared you are familiar with the following policy area: AIR QUALITY AND POLLUTION. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☒ Reporting process is inefficient, significant improvements are needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

See Specific Comments under point 6

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

Perhaps at a later stage.

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: BIODIVERSITY AND NATURE. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☐ Too much, less is needed
- ☒ About right
- ☐ Too little, more is needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

For some policies there is no reporting obligation (yet): for example on seals, zoos and leghold traps. The reporting on Invasive Alien Species is in development and seems to become very extended.

For example derogation reporting for Birds Directive (art.6) and Habitats Directive (art. 9) is very detailed and it is not clear how the information is used. On the other hand for the national reports for Birds Directive (art.12) and Habitats Directive (art. 17) there is now a very constructive discussion on the need and form of the reports, aiming at detail and type of information needed and used.

4.2. Efficiency

You declared you are familiar with the following policy area: BIODIVERSITY AND NATURE. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☒ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

Some information is hard to gather, for example for the derogation reporting under Habitats Directive and Birds Directive. It is expected that the burden for the Invasive Alien Species will be high as well.

For national reports under Birds Directive and Habitats Directive in the Netherlands information on migrating fish, marine mammals and marine habitat types is shared with the reporting under the Marine Strategy Framework Directive.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

Perhaps at a later stage.

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: CHEMICALS. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☐ Too much, less is needed
- ☒ About right
- ☐ Too little, more is needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

4.2. Efficiency

You declared you are familiar with the following policy area: CHEMICALS. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☒ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

Every five years there is an investigation.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: NATURAL RESOURCES. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☐ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

Not clear monitoring and reporting under which EU legislation is meant.

4.2. Efficiency

You declared you are familiar with the following policy area: NATURAL RESOURCES. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

Not clear monitoring and reporting under which EU legislation is meant.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: NOISE. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☒ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

The END does not imply norms, each MS sets a threshold 'norm' above which problems have to be addressed. Nevertheless the END requires extensive and detailed reports

Benefits of these detailed reports are questionable. EU-wide insight on state of play and approach could be of use if further EU noise (source) policy is to be developed. At this point in time the data are not suitable and effects on the noise emissions EU legislation is lacking (another DG). Limited comparability of MS reports due to allowing various national calculation methods. The EU harmonised method CNOSSOS will be an improvement, nevertheless the quality of input data and its impact on the data reported to the Commission is a risk still not addressed/solved

Hard to motivate local authorities to implement noise policy/noise abatement programmes because most cost-effective measures are at noise sources which are the competence of EU (e.g. noise emission limits for cars) and extra measures suffer from budget cuts

4.2. Efficiency

You declared you are familiar with the following policy area: NOISE. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☒ Reporting process is inefficient, significant improvements are needed

☐ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

No room for small deviations in the reporting mechanisms. NL wants to report for all major roads because the threshold of >3 million vehicle passages/year is exceeded on 90% of these roads. However the Cion doesn't allow this. Method differences and inevitable variations in accuracy and levels of detail of the input data lead to incomparable results between competent authorities (such as national road authority and municipalities). CNOSSOS might decrease the differences in method, but not the differences in the quality of the input data.

Streamlining with reporting on air quality (because of correlation with traffic) seems logic, but at this point in time this is not possible because of different time schedules and reporting frequencies.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

Perhaps at a later stage.

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: SOIL. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☐ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

No EU soil legislation

4.2. Efficiency

You declared you are familiar with the following policy area: SOIL. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

No EU soil legislation

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: WASTE. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☐ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

Amendments of the EU waste legislation is currently being negotiated. The Netherlands will react to the Monitoring and Reporting obligations in the waste package in the context of the negotiations.

4.2. Efficiency

You declared you are familiar with the following policy area: WASTE. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☐ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☒ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

Amendments of the EU waste legislation is currently being negotiated. The Netherlands will react to the Monitoring and Reporting obligations in the waste package in the context of the negotiations.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

We are interested in getting more information about your perceptions as regards the policy area(s) you are familiar with. See below the two questions related to section 4. Current perceptions of environmental reporting (after these questions, please continue with question 3.3).

4.1 Effectiveness

You declared you are familiar with the following policy area: WATER. Which of these statements do you consider as appropriate about the amount of information that is collected?

- ☒ Too much, less is needed
- ☐ About right
- ☐ Too little, more is needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific evidence that could underpin your response?

1000 character(s) maximum

- Reporting to get a general insight of progress towards objectives of a Directive is useful. However reporting is more detailed than necessary for a compliance check, especially for the WFD. E.g. the questions on the gap in reaching objectives and the percentage of the gap that is filled by this or

that measure go too far for anything outside of a controlled laboratory situation. In reality this gap analysis isn't possible in a multi-pressure situation and reporting about it doesn't make sense

- Money spend on monitoring, assessment and reporting can't be spend on measures. Monitoring of marine ecosystems is expensive. Therefore monitoring/reporting needs to be as efficient as possible. Reporting similar information under different directives, differences in tech. aspects of reporting (e.g. enumeration lists), late reporting guidances and lack of clarity on how reported data/information will be used causes inefficiency and make the reporting a too large administrative burden for MS

4.2. Efficiency

You declared you are familiar with the following policy area: WATER. Which of the following statements do you consider appropriate when assessing the cost and administrative burden of the reporting process?

- ☐ Reporting process is efficient (good practice example)
- ☒ Reporting process is neither efficient nor inefficient, some specific improvements could be made
- ☐ Reporting process is inefficient, significant improvements are needed
- ☐ No opinion

Do you have specific comments, concrete examples or specific suggestions?

1000 character(s) maximum

Some information is hard to gather, for example for the derogation reporting under Habitats Directive and Birds Directive. It is expected that the burden for the Invasive Alien Species will be high as well.

For national reports under Birds Directive and Habitats Directive in the Netherlands information on migrating fish, marine mammals and marine habitat types is shared with the reporting under the Marine Strategy Framework Directive.

Are you able to provide any quantitative evidence or references relating to the costs of monitoring and reporting for authorities, regulators, sectors or businesses?

1000 character(s) maximum

Perhaps at a later stage.

3.3. Objectives

How important do you rate these different **objectives** (which relate to relevance and coherence) for setting environmental Monitoring and Reporting requirements?

Please use a scale from 1 to 10 where '1' would mean that the objective is not important and '10' would mean that is extremely important.



	1	2	3	4	5	6	7	8	9	10
Monitoring and reporting should allow for an assessment of whether EU legal obligations are being met										
Monitoring and reporting should allow stakeholders to understand the state of the environment and the actions taken to maintain and improve it										
Monitoring and reporting should indicate how well the legislation is working (i.e. costs and benefits)										
Monitoring and reporting should generate reliable environmental information and ensure access to environmental information for citizens so they understand what EU legislation achieves										
Monitoring and reporting should allow comparison between Member States as regards their performance when implementing EU environment law										

3.4. Principles

How important do you rate these different **criteria** for setting environmental Monitoring and Reporting requirements and delivering EU value added?

Please use a scale from 1 to 10 where '1' would mean that the criterion is not important and '10' would mean that is extremely important.

	1	2	3	4	5	6	7	8	9	10
Comprehensive: Monitoring and reporting should provide a very detailed picture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Efficiency: Monitoring and reporting should cover the information on the costs and benefits of the action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Coherence: Information should be collected once, and shared where possible for many purposes (minimise overlap)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Proportionality: A balance should be struck between asking for more information, and the cost of that provision	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Accessibility: Reported information should be fully available to the general public, after due consideration of	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

the appropriate level of aggregation and subject to appropriate confidentiality constraints										
Timeliness: Monitoring and reporting information should be timely and up to date	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Current perceptions of environmental reporting

Questions 4.1 and 4.2 are only answered for the policy area(s) you are familiar with, and that you chose when responding to question 3.1.

4.3. Different governance levels

As well as environmental reporting obligations towards DG Environment, there are a number of international obligations, for example, to European marine conventions, OECD, UN, and UNECE. Attention needs to be made to ensuring that synergies are exploited between these commitments, and that inconsistencies are avoided.

What are the levels of governance where there is the biggest potential to combine or streamline reporting requirements in order to reduce costs and administrative burdens?

Please use a scale from 1 to 10 where '1' would mean that the level of governance is not relevant and '10' would mean that is extremely relevant.

	1	2	3	4	5	6	7	8	9	10
International (wider than Europe)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member State (including national Competent Authority)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Regional and local	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Do you have specific comments, concrete suggestions or specific evidence that could underpin your response?

1000 character(s) maximum

The biggest potential is expected on the international en EU-level. But for biodiversity and Marine Strategy on the level between EU and MS, in resp. bio geographical regions and appointed areas (river basin areas).
E.g. for Kyoto (UNFCCC) and LRTAP (NEC) and on EU level EU-MM and NEC, for all separate reporting needed. EU itself has to report based on MS reports. Often great time pressure. EU often wants slightly different information.
Harmonisation needed.

For noise the scores are. Question 1: 2, Q 2: 4, Q 3: 6 and Q. 4: 8. Because there are no EU or international norms, streamlining on these levels will not lead to less burden.
Depending on the constitutional organisation of the administration (federal state, autonomous regions etc) streamlining on national or regional level might lead to a more efficient implementation. But this should be left to the MSs (subsidiarity).

4.4 The Standardised Reporting Directive

This Directive was agreed in 1991 to provide a single harmonised approach. Many specific reporting decisions in different policy areas (e.g. water, waste, etc) have been agreed. Over time, however, most reporting requirements have been included in specific pieces of legislation so that they can be better tailored to the needs of those specific pieces of legislation. The Commission is now considering the repeal of the Standardised Reporting Directive including all its specific reporting questionnaires most of them being obsolete already. However, the question in relation to the Fitness Check on monitoring and reporting is whether such a legally binding, horizontal approach should be developed again in the future.

In this context, do you agree or disagree with each of the following statements?

	I totally agree	Tend to agree	Tend to disagree	Totally disagree	No opinion
The reporting obligations should be laid down specifically in individual pieces of legislation and coordination and streamlining should be	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

ensured through collaboration					
Reporting requirements do not need to be laid down in legislation but should be agreed informally on a case-by-case basis between the EU Commission and the Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have specific comments or concrete suggestions?

1000 character(s) maximum

Question 1 is 2 questions in one. Both questions have different answers: agree/disagree.

Question 2: in general not much gain is expected here.

However for Water: 'totally agree'. There are informal EU working groups that have drawn up reporting guidance. Although not yet 100% contentment, there is the impression that the arrangements for water are relatively good. The informal cooperation and common adoption of reporting guidance contributes because MSs are allowed to join in the conversation.

Non legal reporting requirements allow for flexibility in taking in improvements after a first reporting cycle.

Beware of high expectations: coordination and streamlining of reporting obligations through collaboration sounds easier than it is in reality.

4.5 The process for reporting

As well as the content of what is reported, the process for reporting is important for ensuring that the right information is collected, processed and disseminated at lowest possible cost. IT technologies could be one of the answers.

In this context, do you agree or disagree with each of the following statements?

	I totally agree	Tend to agree	Tend to disagree	Totally disagree	No opinion
IT technology is already adequately used and no further major improvements of the reporting process are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The INSPIRE directive can provide a common approach and process for reporting,					

reducing administrative burden and facilitating reuse of the reporting process and information across different levels of government					
The business process and quality assurance procedures (outside the rules laid down by the INSPIRE Directive) in place for reporting are still causing significant administrative burden and need to be improved					
More help is needed for the Member States in preparing reports including the development of common tools					

5. Areas for further consideration

We would welcome specific suggestions as to what we should look at during this Fitness Check of the environmental acquis in relation to monitoring and reporting. Please suggest any issues you wish.

1000 character(s) maximum

The Netherlands noticed that the main aim of reporting according to the introduction is compliance checking. No reference is made to e.g. policy effectiveness.

In the introduction information “need” is mentioned, but there is no reference to the “use” of information.

The consultation seems to be about the whole environmental acquis. But reporting on horizontal directives and on for instance the Seveso directive (DG ENV competence) climate and energy legislation, environmental legislation (and reporting obligations) made in DG MOVE and DGSANCO are missing. Also the air and noise emissions EU legislation is missing.

The relationships of M&R with obligations under the Aarhus directive need to be clarified.

There is no possibility to answer the questions 4.1 and 4.2 for INSPIRE. See additional comments under 6.

6. Providing additional evidence

If you have prepared a dedicated position paper or want to share any other related material with the Commission, please use the upload function.

• bc9e14eb-915a-463c-b49c-6082cb8225db/Streamlining monitoring and reporting obligations in environment policy position paper and additional comments NL.docx

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