



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 type="radio"/> Public authority | <input type="radio"/> International organisation |
| <input type="radio"/> Professional organisation | <input checked="" 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

Austria
▼

Other, please specify below

200 character(s) maximum

Austrian Federal Economic Chamber - mandatory Membership of almost 500,000 companies of Industry, Trade, Small Manufacturing, Tourism, Services, Banking and Transport

* 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

Axel Steinsberg, Austrian Federal Economic Chamber, A-1045 Vienna Austria:
Interest Representation Register No 10405322962-08

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

200 character(s) maximum

axel.steinsberg@wko.at

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

Monitoring and reporting could be more coherent (f.e. PRTR vs. Industrial Emissions Directive) and targeted (relevant emissions covered only by a small number of companies; monitoring not necessary for the big majority of SMEs). This would also improve political conclusions drawn out of reports.

It is important to raise level of harmonised implementation of monitoring and reporting requirements in Member States. On the one hand, to receive better and more comparable data, on the other hand, to avoid competitive distortion by different levels of red tape in EU Member States. The priority for harmonisation should preferably result in better implementation rather than new legislation.

Monitoring obligations and costs for both public authorities and companies are in general substantial and therefore to be monitored attentively towards their optimization potential. Monitoring by random samples should be rather used than full assessment & registers.

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

The question of effectiveness needs to be considered very differentiated for the subject of air quality and pollution. F.e., concerning air quality, local circumstances are very relevant to limit values as well as reporting frequency and accuracy. Too much information is to be collected for Industry Emissions Directive installations as well according to PRTR. More harmonisation of measuring obligations is to be supported.

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

National air monitoring instruments (in Austria: OLI) are not fully compatible with EU instruments such as the scenarios used by IIASA for the NEC directive proposal by using conflicting definitions for polluters in the field of industry and transport.

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

There is no reliable data from Statistics Austria with regard to the costs of monitoring and reporting in the field of air quality and pollution for authorities or businesses.

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

The nomination of new Natura 2000 designated areas is to be based on solid scientific facts - something often being missed in the procedure of such nominations.
The post-monitoring of sites should be better targeted, enabling species which are not to be protected anymore to get deleted from the list of a designated Natura 2000 area.

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

Article 17 reports of the Habitats Directive 92/43/EEC require the Member State to execute a full assessment of protected species - whether inside or outside of current Natura 2000 areas - on a regular basis (every six years). The interval between these reports is too short and should therefore be extended. Affected parties are in urgent need of investment and planning security by substantially longer and extended reporting intervals. 12 or 15 years could be a proper interval offering this kind of security. The same proposal applies for Article 12 of the Birds Directive 79/409/EEC (about every 12 years instead of every 3 years).

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: 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

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

The Austrian Resource Efficiency Action Plan (REAP) is being considered as a best practice example.

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

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

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

The EU system of noise maps is working fairly efficiently and is transparent to the public.

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: 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

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

Legal requirements regarding the baseline report on the state of soil and groundwater contamination based on Article 22 IED include too many monitoring & reporting obligations. Especially for Member States with a high level of precaution such an enormous level of effort is not proportionate to the output. The Austrian report to be established by IED installations is called "Ausgangszustandsbericht - AZB". Effort and complexity of this report which is being accompanied by Austrian guidelines are substantial and not proportionate to the output.

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

On the average an Austrian "AZB" (state of soil and groundwater contamination based on Article 22 IED) costs 50,000 to 100,000 euro per industrial site lacking the respective proportionate added value.

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

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

There is a general discrepancy between reporting requirements of Eurostat on the one hand and of the EU waste legislation (especially the EWC) on the other hand. In Austria, a separate waste catalogue differs from the EWC, another discrepancy. Those discrepancies are to be eliminated.

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

Double regulation for businesses and therefore ineffective and inefficient red tape are being seen in monitoring and reporting obligations on water in both the PRTR Regulation and the Water Framework Directive.

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

One parameter should be reported only once, also to avoid incoherent data stemming from different system boundaries (referring to certain pollutants such as heavy metals).

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

Business costs of national monitoring emissions of priority substances according to EQS Directive per year: 1.9 million euro in total without considering the costs of surveillance and evaluation by federal authorities:

- Average costs of 3,333 euro x 229 businesses obliged to report = 763,000 euro p.a.
- Average costs of 1,755 euro x 634 municipal sewage plants = 1.113 million euro p.a.

--- Reference: Final Report: Evaluation EMREG-OW, Federal Ministry for Agriculture, Forestry, Environment and Water Management (BMLFUW); Vienna 2014.

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>						

Monitoring and reporting should allow stakeholders to understand the state of the environment and the actions taken to maintain and improve it	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>				
Monitoring and reporting should indicate how well the legislation is working (i.e. costs and benefits)	<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"/>
Monitoring and reporting should generate reliable environmental information and ensure access to environmental information for citizens so they understand what EU legislation achieves	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>				
Monitoring and reporting should allow comparison between Member States as regards their performance when implementing EU environment law	<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"/>

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

<p>Comprehensive: Monitoring and reporting should provide a very detailed picture</p>	<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"/>
<p>Efficiency: Monitoring and reporting should cover the information on the costs and benefits of the action</p>	<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 type="radio"/>	<input checked="" type="radio"/>
<p>Coherence: Information should be collected once, and shared where possible for many purposes (minimise overlap)</p>	<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 type="radio"/>	<input checked="" type="radio"/>
<p>Proportionality: A balance should be struck between asking for more information, and the cost of that provision</p>	<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 type="radio"/>	<input checked="" type="radio"/>
<p>Accessibility: 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</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>						

Timeliness: Monitoring and reporting information should be timely and up to date	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>					
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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 checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Member State (including national Competent Authority)	<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 type="radio"/>	<input checked="" type="radio"/>
Regional and local	<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"/>

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

Comment on 3.3., 3.4. and 4.3.:

- Harmonisation of monitoring and reporting requirements is first priority.
- The interpretation of statistical material is the next delicate step which has to be executed very carefully.
- Voluntary schemes such as EMAS are to be preferred to monitoring and reporting obligation for businesses.
- Monitoring obligations are too high in general regarding environmental issues.
- Monitoring by random samples should be rather used than full assessment & registers.
- Miss-use of data is to be excluded as far as possible when designing monitoring and reporting requirements.
- The EU level is the primary level to avoid disproportionate red tape - more regulations instead of directives could support both harmonisation and avoiding red tape in the origin. But of course, the national level also offers a very high streamlining potential for monitoring and reporting requirements - even if the EU level would already be optimised.

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 ensured through collaboration	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting requirements do not need to be laid down in legislation but should be agreed informally on a	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

case-by-case basis between the EU Commission and the Member States					
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Do you have specific comments or concrete suggestions?

1000 character(s) maximum

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

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.

Contact

✉ ENV-D04@ec.europa.eu
