EUROPEAN RISK FORUM – COMMUNICATION 16

EUROPEAN COMMISSION PUBLIC CONSULTATION ON COMMISSION GUIDELINES FOR IMPACT ASSESSMENT

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EXECUTIVE SUMMARY

This is a contribution by the European Risk Forum (ERF, www.riskforum.eu) to the public consultation launched by the European Commission on its Guidelines for Impact Assessment. The ERF considers that, in overall terms, the proposed guidelines represent a step forward, and are to be welcomed. The ERF invites the Commission to consider a number of areas of possible improvement, including:

- Make the Commission's IA process, and supporting procedural requirements, legally binding;
- Establish clear quality principles and standards for data, its collection, and use;
- Require all draft impact assessments to be published and subject to public consultation, adhering to the Commission's minimum standards for stakeholder consultation;
- Expand the membership of the Impact Assessment Board to include the Chief Scientific Adviser;
- Amend the mandatory requirements to require IAs to be revised whenever regulatory proposals are substantially altered;
- Expand the guidelines to help officials develop high quality IAs when assessing proposals to implement secondary legislation;
- Ensure that all guidelines, used to support the Commission's IA process, are available for expert review and public scrutiny;
- Revise the scope of application of the IA process to include major agency decisions and substantive guidance used to implement secondary legislation;
- Require all IAs to quantify and monetise impacts, wherever this is possible and appropriate;
- Expand the guidelines to include a specific annex describing the best way to carry out IAs when assessing proposals to manage potential harms;
- Recognise within the guidance the increasing use of stigmatisation, blacklists, substitution and other 'soft' tools to manage risks, highlighting their strengths and weaknesses;
- Involve stakeholders extensively in the process of determining whether an IA should be carried out;
- Provide a more extensive definition of the criteria that must be fulfilled if an IA is to be carried out;
- Expand the guidelines to include supporting annexes for the 'Option Comparison' and 'Monitoring and Evaluation' stages of the decision-making framework;

- Require officials to explain why available, high quality evidence is not used to inform assessments of the problem facing citizens;

- Strengthen requirements to assess the scale of the problem facing citizens before developing proposals for government action;

- Strengthen the definition of the 'baseline' to include an extensive analysis of why existing rules are unable to resolve the problem facing citizens;

- Require the objectives of a proposal to be quantified and supported by performance measures that allow progress to be tracked;

- Require officials to assess the 'workability' and 'legitimacy' of policy options, as well as their effectiveness, efficiency and other characteristics;

- Highlight the need for policy-makers to identify the potential responses of businesses, citizens and other affected parties to proposed policy actions;

- Require officials to place greater emphasis on understanding more of the complex impacts of modern regulatory actions on businesses and citizens;

- Strengthen the requirements for officials to assess the potential benefits of regulatory options rigorously and comprehensively;

- Expand the explanation of the problem of "unintended consequences" of policy options that is included within the draft guidelines;

- Revise the description of the impact of regulations on innovation;

- Avoid stigmatising technologies in the guidelines;

- Require officials to identify proposals where benefits justify costs and to rank alternatives on the basis of maximising net benefits and minimising restrictions on market mechanisms and personal freedoms; and

- Include the "Innovation Principle" and Trans-Atlantic Trade in the list of horizontal priorities to be covered by all IAs.

1. INTRODUCTION

This is a contribution by the European Risk Forum (ERF, www.riskforum.eu) to the public consultation launched by the European Commission on its Guidelines for Impact Assessment. The draft document has been published for public comments from 30 June 2014 to 30 September 2014.

Impact Assessment (IA) is one of the most widely-used processes for improving the quality of regulatory decisions.[1] In a wide range of different legal and regulatory settings, it helps regulators improve the effectiveness of regulatory outcomes, whilst, at the same time, reducing the costs of regulatory decisions. IA reduces the risk of regulatory failure.

IA is used to support decisions made by regulators and politicians: it is not a substitute for political action. Nor is it a mechanistic process, basing decisions on simplistic comparisons of quantified costs and benefits. Instead, it encompasses a wide range of qualitative and quantitative methods aimed at systematically and openly assessing the negative and positive impacts of proposed and existing regulation. IA forms an essential part of a modern, transparent, accountable, and empirically-based regulatory system.

Regulators employ IA tools and processes because, if designed well and implemented effectively, they deliver a wide range of benefits for decision-makers, citizens, and businesses. Specifically, high quality IA processes:

- Enhance the rigour, transparency, and accountability of regulatory decision-making processes, including strengthening consultation;
- Provide a formal mechanism for better structuring of the decision-making process, helping to ensure that the "need" for government action is justified fully and based on a credible understanding of cause and effect;
- Help decision-makers assess alternative policy interventions (including no action by government) explicitly;
- Highlight "true" impacts of regulatory decisions, including qualitative benefits, complex costs,[2] and unintended consequences; and
- Promote regulatory strategies that maximise net benefits of government action.

Since 2002, the Commission has made substantial progress in establishing one of the largest and most comprehensive IA programmes in the world. In that year, the Commission introduced an integrated impact assessment system (IA), covering economic, social, and environmental factors, and supported by detailed technical guidelines. These changes

[1] Throughout this note, the use of the term 'regulations' refers to primary law-making decisions as well as implementing or regulatory decisions. At EU-level, and respecting the distinctions made in the Treaty, this corresponds to secondary legislation, such as EU Directives or Regulations, and technical implementing decisions made through processes such as Delegated and Implementing Acts (sometimes described as 'new' comitology).

[2] Most impact assessments only measure the direct costs of complying with new or revised rules. Increasingly, these are of only limited importance. Of much greater importance to citizens are the ancillary benefits and wider, complex costs created by regulatory activity. Such costs include the response of companies and citizens to government intervention, including impacts on location of economic activity, nature and price of products, level of employment, and extent and nature of innovation. Complex costs also occur when regulatory activity triggers complex market mechanisms, such as demand stigmatisation, leading to losses of sales and margins.

formed part of wider series of initiatives designed to both improve governance and instil a "new regulatory culture" at EU-level. Subsequent reforms and policies, including the Smart Regulation agenda, have confirmed this commitment.

IA requirements, processes and guidelines were up-graded further in 2005, 2006 and 2009, reflecting lessons learned from the operation of the new system. The Commission's approach encompasses mandatory requirements, supported by operational and technical guidance and overseen by a cross-cutting institution.

As part of this strategy, IAs are mandatory for all new proposals for secondary legislation and for some other major policy initiatives, and they are based on the principles of "proportionate analysis". And, the scope of mandatory IAs has been expanded recently to encompass Delegated and Implementing Acts with significant impacts, recognising the conclusions of the Commission's REFIT exercise. Mandatory procedural rules for the policy-making process have also been established, including cross-sectoral consultation within the Commission, the final publication of the IAs, and the requirement to use a formal six-step framework for policy-making (problem identification; definition of objectives; development of options; analysis of impacts of options; comparison of options; and ideas for monitoring and evaluation).

Extensive policy guidelines, expanded significantly in 2009, support the process and structure procedural requirements. These encourage officials to understand and identify indirect impacts of proposed rules; to make use of outside expertise; to consult with external stakeholders and to review alternatives rigorously. A small number of key technical assumptions are also included in the guidelines, along with ideas about possible quantification techniques for costs and benefits, including on administrative burden.

A high-level, cross-cutting institution located at the heart of the Commission, the Impact Assessment Board (IAB), oversees the quality of IAs drawn. Set up in 2006, this small group of high-level officials examines draft assessments and issues opinions. It reports to the President of the Commission and works through informal, collegial processes rather than using formal powers, such as "letters of return".

The ERF welcomes the opportunity to comment on the draft guidelines and expresses full support for the efforts made by the Commission to upgrade regulatory process standards in general and impact assessment in particular.

Three types of comments are included in this note: general reflections on the Commission's impact assessment strategy, including recommended reforms; comments on the strengths of the draft guidelines; and ideas for improving the guidelines.

2. IMPACT ASSESSMENT STRATEGY

Between 2002 and 2014, the Commission has taken major steps to develop a widely respected impact assessment strategy. Major reforms include the introduction of mandatory requirements for the use of IA in 2002; the creation of the IAB in 2006; an enhancement of the quality and utility of the supporting guidance in 2009; and, an expansion of the scope of

the mandatory requirements to include delegated and implementing acts with significant impacts.

Although the Commission's approach to impact assessment is, in general, of high quality and meets many of the good practices for effective regulation identified by the OECD and others, there are a number of areas where improvements could be made. Specific ideas for improvement include:

- **Make the Commission's IA process, and supporting procedural requirements, legally binding**, creating enforceable rights for affected parties and creating powerful incentives for regulators to comply with agreed requirements. One way in which this could be done is to include a legal requirement to demonstrate, using evidence, a need for government action and an understanding of costs and benefits within an EU-level Law of Administrative Procedures, recognising such requirements as supporting the principles of good administration.
- **Establish clear quality principles and standards for data, its collection, and use**, most notably for scientific evidence supporting public risk management decisions. With regard to scientific evidence, the principles and standards should have a presumption favouring peer reviewed data and results and require sufficient transparency to facilitate reproducibility. They should require studies, information, and data to be based on widely accepted and objective practices (the "scientific method"). They should require legislative and regulatory decisions to be based on the best available science and should emphasise the paramount importance of 'excellence'. They should define tests of objectivity that encompass both 'bias' and conflict-of-interest', recognising the need to gain access to all sources of expertise, including that funded by the private sector; and they should require studies and data to be assessed solely on the basis of scientific quality. Finally, they should provide a comprehensive set of key concepts and definitions used in the provision of scientific advice, including definitions of 'best available science', the 'scientific method', 'uncertainty', 'hazard' and 'risk'.
- **Require all draft impact assessments to be published and subject to public consultation, adhering to the Commission's minimum standards for stakeholder consultation.** Special emphasis should be placed on ensuring that officials account publicly and specifically for the use of inputs received through the consultation process, including explaining why criticisms and recommendations provided by stakeholders have been rejected.
- **Expand the membership of the Impact Assessment Board to include the Chief Scientific Adviser**, with specific responsibility for assessing the quality of scientific evidence used to justify policy action and for reviewing all risk management decisions that make use of the Precautionary Principle.
- **Amend the mandatory requirements to require IAs to be revised whenever regulatory proposals are substantially altered**, ensuring that decision-makers are fully informed of the costs and benefits of new ideas throughout the policy-making cycle.

3. GUIDELINES – IMPROVEMENTS

In overall terms, the proposed guidelines represent a step forward, and are to be welcomed. Major improvements in the IA process set out in the draft include:

- **Principles** – the draft guidelines require IAs to take account of eight principles. These apply to all IAs. They require each IA to be comprehensive, proportionate, evidence-based, open to stakeholders' views, unbiased, conducted in co-operation with other services, embedded in the policy cycle, and transparent. The definition of these requirements is a major advance. Appropriate application should enable officials to react flexibly to different forms of government action, whilst ensuring that IAs of high quality. Principles, which must be followed in all circumstances, will also provide the IAB with an additional means of scrutinising IAs, strengthening oversight of the process.
- **Evidence** – the draft principles require IAs to be based on the best available evidence and scientific advice. This requirement builds on earlier commitments made by the Commission to make use of evidence-based decision-making. If this is achieved, then it should raise the quality of regulations, reduce uncertainty, and support innovation. For this to occur, however, further reform is necessary. Institutional structures need to be enhanced, such that the Chief Scientific Adviser's position is made permanent and the post-holder is given responsibility for overseeing the use of science in decision-making throughout the Commission and its agencies. Policy changes are needed too. A new policy is required for the collection and use of science in decision-making. Recent changes made in the Rules of Procedure of the Commission's independent scientific committees provide a starting point for the development of such a policy.
- **Evaluation** – the draft guidelines build on the Commission's new ex post evaluation process, emphasising the need to make use of retrospective analyses when drawing up IAs. This helps to strengthen the policy-making cycle, using feedback and real world experience to enhance the quality of ex ante analyses and new policy actions. It demonstrates the increasing sophistication and maturity of the Commission's regulatory process management.
- **Scope** – throughout the draft guidelines it is made clear that they apply to implementing and delegated acts, where these have significant impacts. This confirms a commitment, made by the Commission as a conclusion to the REFIT exercise, to include such implementing measures within the mandatory scope of the IA process. This recognises a re-balancing of forms of policy action at EU-level away from Directives (and their decentralised implementation by Member States) and towards centralised law-making (through Regulations) implemented by the 'Administrative State' using implementing and delegated acts, agencies, and substantive technical and scientific guidance.
- **Decision-Making Model** – the draft guidelines propose to expand the Commissions decision-making model, moving away from the six-stage approach set out in 2009. The revised model adds to stages to the existing approach: an explicit assessment of subsidiarity; and a review of the final IA to ensure that it has taken account horizontal policy concerns and quality tests. These are useful changes and should enhance the effectiveness and legitimacy of the process.

- **Consultation** – a theme of the draft guidelines is the need for officials to consult extensively with stakeholders throughout the process of developing an IA. If implemented fully, this should enhance the quality of IAs, providing access to 'real world' experience and challenging assumptions, analyses and conclusions

4. GUIDELINES – FURTHER IMPROVEMENTS

The new guidelines are to be welcomed. Despite these improvements, more needs to be done if the EU's institutions are to maximise the effectiveness of the new IA process. This could include possible improvements to the draft IA guidelines in the following areas:

- General Requirements (see paragraph 4.1.)
- Problem Definition (4.2.)
- Objectives (4.3.)
- Option Identification (4.4.)
- Assessment of Impacts (4.5.)
- Comparison of Options (4.6.)
- Overall Review (4.7.).

4.1. GENERAL REQUIREMENTS

- **Expand the guidelines to help officials develop high quality IAs when assessing proposals to implement secondary legislation,** recognising the increasing importance of the EU's 'administrative state' as a means of meeting the expectations of citizens. As currently structured, the guidance is primarily focused upon the preparation of Directives that will, in turn, be implemented by the Member States on a decentralised basis. Whilst this form of state action remains important at EU-level, it is increasingly complemented by Regulations implemented by central institutions, including agencies, using a range of mechanisms including implementing and delegated acts and substantive guidance.
- **Ensure that all guidelines, used to support the Commission's IA process, are available for expert review and public scrutiny.** Whilst the draft guidelines made available for public consultation constitute a rich body of information for officials, other, technical, tailored guidelines are posted on the Commission intranet only. This additional guidance should be subject to external review and public consultation.
- **Revise the scope of application of the IA process to include major agency decisions and substantive guidance used to implement secondary legislation**.
- **Require all IAs to quantify and monetise impacts, wherever this is possible and appropriate.** Quantification is a global good practice, encouraging officials to rigorously assess the scale of the problem facing citizens and the costs and benefits of government action. It should become the 'default standard' for IAs carried out by the Commission.

- **Expand the guidelines to include a specific annex describing the best way to carry out IAs when assessing proposals to manage potential harms,** recognising that the Precautionary Principle is only applicable in a very limited number of cases. Further ideas, describing the possible contents of such an annex, are included in Section 5.0.
- **Recognise within the guidance the increasing use of stigmatisation, blacklists, substitution and other 'soft' tools to manage risks, highlighting their strengths and weaknesses.** Any guidance should recognise that these risk management measures seek to influence product market decisions on an extensive scale, with potentially significant unintended consequences.
- **Involve stakeholders extensively in the process of determining whether an IA should be carried out,** ensuring that the IAB oversees the outcome of this process. Moving from the Commission's Roadmap to an IA must be a transparent process informed by the views of those likely to be affected by government measures.
- **Provide a more extensive definition of the criteria that must be fulfilled if an IA is to be carried out,** enhancing the predictability and transparency of the initial phase of the IA process.
- **Expand the guidelines to include supporting annexes for the 'Option Comparison' and 'Monitoring and Evaluation' stages of the decision-making framework.**

4.2. PROBLEM DEFINITION

- **Require officials to explain why available, high quality evidence is not used to inform assessments of the problem facing citizens**, recognising that IAs must demonstrate that they are objective and unbiased, if they are be credible and legitimate.
- **Strengthen requirements to assess the scale of the problem facing citizens before developing proposals for government action**, using quantified measures, where appropriate. This should strengthen accountability and trust by highlighting measures that are targeted at major problems.
- **Strengthen the definition of the 'baseline' to include an extensive analysis of why existing rules are unable to resolve the problem facing citizens**, demonstrating an awareness of the maturity of much of the EU's regulatory framework.

4.3. OBJECTIVES

- **Require the objectives of a proposal to be quantified and supported by performance measures that allow progress to be tracked**, establishing a clear standard for government action that requires the power of the state to be used only to target specific problems. This should strengthen the effectiveness of proposed measures, strengthening trust and legitimacy over time.

4.4. OPTION IDENTIFICATION

- **Require officials to assess the 'workability' and 'legitimacy' of policy options, as well as their effectiveness, efficiency and other characteristics.** Analyses of 'legitimacy' should consider, for instance, the acceptability of proposed actions to citizens (including highlighting clashes with deeply-held values or attitudes), and the potential for policy choices to increase criminalisation or criminality. Reviews of 'workability' should assess the potential for poorly designed proposals to increase the need "administrative discretion" by officials, for instance. They should also recognise the 'novelty' of certain regulatory measures, highlighting a lack of evidence of effectiveness or the potential for unintended consequences. Examples of such measures include the use of the substitution principle to manage harms or reliance upon public blacklists to shift product market behaviours.

4.5. ASSESSMENT OF IMPACTS

- **Highlight the need for policy-makers to identify the potential responses of businesses, citizens and other affected parties to proposed policy actions.** More use should be made of "impact-response" models, for instance. These emphasise the need for policy-makers to understand changes in behaviour (intended and unintended) triggered by government interventions, leading to a more informed and rigorous analysis of costs and benefits. At present, many analyses of costs and benefits are restricted to assessments of projected compliance costs.
- **Require officials to place greater emphasis on understanding more of the complex impacts of modern regulatory actions on businesses and citizens.** Such impacts include problems of demand stigmatisation, barriers to dissemination of new "general purpose technologies", and the impact on innovation of regulatory options that increase the time, cost, or risk of developing new ideas.
- **Strengthen the requirements for officials to assess the potential benefits of regulatory options rigorously and comprehensively.** Benefits should be expressed quantitatively, wherever this is possible.
- **Expand the explanation of the problem of "unintended consequences" of policy options that is included within the draft guidelines.** As currently set out, the examples of unintended outcomes are limited and incomplete. A more extensive list of examples, supported by a more complete text, may help officials to become more aware of this important issue. The potential for ancillary benefits should also be considered.
- **Revise the description of the impact of regulations on innovation,** recognising the importance of strengthening risk acceptance, minimising increases in the time and cost needed to develop new products, limiting losses of well-established materials (due to defensive R&D), and minimising distortions of product market activity.
- **Avoid stigmatising technologies in the guidelines**, ensuring that guidance reflects law.

4.6. COMPARISONS OF OPTIONS

- **Require officials to identify proposals where benefits justify costs and to rank alternatives on the basis of maximising net benefits and minimising restrictions on market mechanisms and personal freedoms.** OECD recommendations in 2012, accepted by the Commission and the Member States, require regulators to try and ensure that the benefits of regulatory proposals justify costs.

4.7. OVERALL ASSESSMENT

- **Include the "Innovation Principle" and Trans-Atlantic Trade in the list of horizontal priorities to be covered by all IAs**, demonstrating a commitment to focus the efforts of the Commission on increasing the economic performance of the EU economy.

5. GUIDELINES – RISK MANAGEMENT

Public risk management is one of the fundamental ways in which governments solve problems and meet the expectations of citizens. Today, it is most readily associated with government actions to protect people at work and to protect citizens and the environment from harm. But as a core function of government, risk management has been a potent and pervasive form of public policy for more than 200 years. In that period it has been used to support a range of varied policy objectives, most notably creating the conditions for economic prosperity by managing risks to trade and investment; protecting industrial workers from the impacts of economic activity; and protecting citizens and the environment from ruinous risks.

Public risk management can be broadly defined as any government action designed to prevent, reduce, or re-allocate risk. It includes actions to manage risks posed by technologies, economic activity, and lifestyle choices.

The EU's institutions, along with governments in most other modern economies, have progressively expanded their risk management responsibilities. These now encompass issues such as product safety, food safety, pharmaceuticals, chemicals, environmental protection, public health, occupational health and safety, and consumer protection.

Despite this, the new guidelines provide only limited advice about how to make the most effective use of impact assessment, when seeking to manage harms posed by technology or lifestyle choices. Within the guidelines more emphasis needs to be placed on the distinctive nature and importance of this 'horizontal' theme of EU-level policy-making.

Specifically, the following improvements could be made to the Commission's draft IA guidelines:

PROBLEM DEFINITION

- **Require all legislative, regulatory, and guidance proposals designed to manage lifestyle or technological risks to human health, public safety, or the**

environment to be accompanied by the findings of formal scientific risk assessment, designed to support analyses of problem definition and regulatory options, and meeting internationally accepted standards;

- **Recognise the characteristics of different types of threats (including lifestyle and technological risks)**, define them on the basis of scientific knowledge, and take account of this in assessing problems, identifying risk management options, and assessing the costs and benefits of policy action;
- **Base all scientific risk assessments on the best available scientific and technical information**, and ensure that conclusions about a problem's potential risks to human health, public safety, and the environment assessments take full account of the weight of scientific evidence. Assessments should, moreover, distinguish clearly between 'hazard' and 'risk', identify realistic exposures to hazards; and highlight scientific uncertainties (using well-established typologies of different types of uncertainty);
- **Require risk assessments to be subject to peer review** if they are to be used to support major legislative or regulatory decisions.

OBJECTIVES

- **Require objectives for new or revised EU-level risk management rules to recognise the importance of risk-taking** for innovation, economic prosperity and long-term improvements in the quality of life; and, to accept that zero risk is neither achievable nor desirable in modern societies and that legislation cannot achieve this;
- **Base objectives on quantified improvements in health or the environment**, requiring officials to demonstrate a clear and credible link between problem, action, and result.

POLICY OPTIONS

- **Highlight precaution as one of a number of legitimate and distinctive approaches to risk management decision-making but recognise its weaknesses** and require its use to be cost-effective, based on scientific evidence, proportionate, limited in scope, non-discriminatory, consistent with international agreements, and provisional. The IA guidelines should, for instance, highlight the limited and specific circumstances in which the precautionary principle should be considered as a potential option for managing risks at EU-level.

ASSESSMENT OF IMPACTS

- **Require officials to make extensive use of quantitative analyses when assessing the costs and benefits of different risk management options.** These should include, wherever appropriate, monetary analyses and the use of modern cost effectiveness analyses. Assessments of potential benefits and costs should, moreover, recognise potential unintended negative consequences, and the loss of existing benefits, of specific policy options.

COMPARISON OF OPTIONS

- **Recognise that risk management decisions can, under certain circumstances, create negative unintended consequences**, and require risk managers to take this into account when assessing options (the "risk-risk" problem);
- **Examine the 'workability', 'effectiveness' and 'legitimacy' of new risk management tools and mechanisms, including substance-based substitution, precaution, and direct restrictions on lifestyle activities.** The IA guidelines should include, for instance, a comprehensive description of the problems associated with using hazard-based strategies, such as the Precautionary Principle, to manage risks;
- **Consider issues of social acceptance of risk openly and rigorously during the process of comparing different risk management options**, using scientific evidence to distinguish between threats of harm and perceptions of risk. IA guidelines should require officials to provide an assessment of likely risk acceptance and to highlight relevant evidence used to support such analyses.

European Risk Forum
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Richard Meads and Lorenzo Allio, the Rapporteur and a Senior Policy Analyst respectively at the European Risk Forum, wrote this Communication. However, the views and opinions expressed in this paper do not necessarily reflect or state those of the European Risk Forum or its members.

European Risk Forum

The European Risk Forum (ERF) is an expert-led and not-for-profit think tank with the aim of promoting high quality risk assessment and risk management decisions by the EU institutions, and raising the awareness of the risk management issues at EU-level.

In order to achieve this, the Forum applies the expertise of a well-established network of experts to 'horizontal', cross-sectoral issues. In particular, it addresses regulatory decision-making structures, tools and processes, as well as the risks and benefits of new and emerging technologies, of climate change, and of lifestyle choices.

The Forum believes that:

- High quality risk management decisions should take place within a structured framework that emphasises a rigorous and comprehensive understanding of the need for public policy action (risk assessment), and a transparent assessment of the workability, effectiveness, cost, benefits, and legitimacy of different policy options (risk management);

- Risk management decision-making processes should ensure that outcomes are capable of meeting agreed social objectives in a proportionate manner;

- Risk management decisions should minimise negative, unintended consequences (such as new, unintended risks, economic losses, reduced personal freedoms, or restrictions on consumer choice); and

- The way in which risk management decisions are made should be structured, consistent, non-discriminatory, predictable, open, transparent, evidence-based, legitimate, accountable, and, over time, subject to review.

Achieving these goals is likely to require extensive use of evidence (especially science); rigorous definition of policy objectives; clear and comprehensive description and assessment of problems and their underlying causes; realistic understanding of the costs and benefits of policy options; and, extensive consultation.

The Forum works with all of the EU's institutions to promote ideas and debate. Original research is produced and is made widely available to opinion-formers and policy-makers at EU-level. As an expert group, the Forum brings together multiple sources of evidence (such as the experience of practitioners and policy-makers; non-EU good practices; and academic research) to assess issues and to identify new ideas. Indeed, direct engagement with opinion-formers and policy-makers, using an extensive programme of conferences, lunches, and roundtables, is a feature of the Forum's work.

The ERF is supported principally by the private sector. The ERF does not seek to promote any specific set of values, ideologies, or interests. Instead it considers high quality risk assessment and risk management decisions as being in the public interest. An advisory group of leading academics supports the ERF's work.

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