



OPINION OF THE SCIENTIFIC COMMITTEE ON THE EEA SINGLE PROGRAMMING DOCUMENT 2025-2027

Article 8, paragraph 4-5 of the Regulation (EC) No 401/2009 of the European Parliament and of the Council of 23 April 2009 on the European Environment Agency (EEA), requires the Agency's Scientific Committee (SC) to be consulted on the Multi Annual Work Programme (MAWP) and on the Annual Work Programme (AWP), respectively, before their submission by the Executive Director to the Management Board for adoption.

In the 87th Scientific Committee (SC) meeting on 28 February 2024 (Doc. EEA/SC/87/3.3), the SC was invited to provide its opinion on the draft Single Programming Document (SPD) for the multi-annual period 2025-2027, which includes the 2025 AWP.

Following discussions at the 88th SC meeting on 11 June 2024, we agreed the following:

General comments

We welcome the draft Single Programming Document (SPD) 2025-27 and the extensive and structured feedback received on the Committee's Opinion on the SPD 2024-26 (Doc. EEA/SC/86/09). Overall, the SPD 2025-27 has a clear structure, covering the EEA's mission, the dynamic context in which the Agency operates, new tasks in 2024 and onwards, and how service level and contribution agreements are developing. The Programming Document describes the strategic objectives and concrete activities, including the annual work programme, structured around the five work areas of the EEA-Eionet Strategy 2021-2030. At the same time, the big picture of the EEA's many tasks, partnerships and plans is understandably complicated to capture in a single document. Using more high-level descriptions and moving Tables into Appendices could improve clarity. The Committee would like to submit the following comments and recommendations.

1. **A context of urgency** – A central point of concern is how the EEA addresses in the SPD the context of urgency linked with the triple environmental crisis and their interlinkages combined with severe but transient geopolitical, social and economic crises. This challenge is not really addressed. It could be reflected under, for example, section 2.1. There are many questions involved, e.g., on the resilience of key policies and frameworks, on the need for different knowledge or knowledge provision to underpin EU and national government's responses, as well as responses from societal stakeholders. What will urgency mean for the whole ecosystem of evidence-informed policymaking with regard to the environment and sustainability transitions? What is the impact of the new context for collaboration with other knowledge providers and brokers? What does it imply for synergies or trade-offs across all comprehensive policy challenges? We recommend more explicit consideration of the matter.
2. **International turbulence** – Related to the point of urgency, the 'Strategy for cooperation with third countries and international organisations' (Annex 12) seems to be almost



unchanged compared to the SPD 2024-26. This is somewhat surprising, as the EEA operates in a turbulent international environment in which international cooperation is strained under different national and geopolitical tensions. We recommend that the potential impact of such tensions on the EEA's work be considered in the SPD.

3. **Comprehensive Quality management** – The risk of not delivering due to under-resourced strategic objectives (SOs) was one of the points raised by the SC in its Opinion on the SPD 2024-26. This is part of the broader issue of quality management at the EEA, and could be addressed in Section 1, where Environmental Management is discussed as a part of EEA's overarching processes. In the current draft, Annex 10 is the only place where quality aspects are addressed, focusing on a few risks. At the 87th SC meeting on 28 February 2024, concern was raised about the apparent lack of a comprehensive quality management system at the EEA. One important aspect of such a system is how to ensure scientific soundness of EEA publications in a time where fake news is abundant and political populism could lead to attempts to undermine EEA's credibility. What level of scientific quality and stakeholder interaction should be ensured, when responding to urgent knowledge needs, that ensures robust and informative knowledge that responds to needs? The SC recommends that the EEA takes steps to implement such a quality management system (QMS) as soon as possible.¹
4. **Integrated work** – Section 4.3 of the SDP mentions integration across work areas. The SC welcomes this development but suggests that information on what kind of activities would be taken up to improve integration be outlined. In Table 11, integration across knowledge investment priorities and relevant integration dimensions that are not yet identified should be considered under "Emerging". Overcoming silo-thinking can be done through joint projects, and in the budgeting process, but is also a matter of mindset. The SPD does not really reflect this yet. Even in section 4.3.2 (Communicating for impact), outreach activities are still focused on the environment community when EEA should work with other sectors to promote policies where environmental considerations should also be a main driver (e.g. health, since environment is an important determinant of health). Therefore, it is important to communicate actively with other stakeholders from other regulatory contexts making use of the knowledge produced as a bridge to connect and to support policies in other sectors.
5. **Adequacy of budgetary allocation by the EU institutions** – The SC reiterates its concerns that the Agency's capacity to engage and deliver on the European Green Deal (EGD) continues to suffer from uncertainties in long-term resources, among others with respect to taking into account staff costs increase, inflation increases and other cost increases. The SC recommends that the EEA pursues a dialogue on the format of the Contribution Agreements (section 2.2.3), depending on whether they are time-limited akin to Service Level Agreements, or permanent enough to be included in the Grant.

¹ Peer learning could accelerate this; there are at least two good practice examples: The EU Common Assessment framework (CAF) adopted recently by the [EU-LISA agency](#) in Tallinn, and the ISO 9001:2015 QMS as adopted by the [EU ECHA agency](#) in Helsinki and by the [Austrian Federal Environment Agency](#) in Vienna. If EEA decides taking such a step, we recommend that this should be reflected in Annex 10 of the SPD 2025-27 – or even in the main text of the SPD, as quality management is usually an executive management priority.



Specific comments

1) Annual performance objectives and indicators

6. The performance objectives (Table 3) should also recognize the Environmental Management performance alongside financial and human resources use etc. In Table 4, it would seem to be relevant to update the Baseline (now 2021) for a better understanding of the forward-looking targets. The Baseline and Targets, where missing (- or TBC) would be relevant to provide. In this context, the SC would also like to suggest the EEA to assess and secure the efficacy of its carbon-offsetting scheme (Annex 6) which is part of the EEA's Environmental management, given the many criticisms on these schemes during recent times.
7. For clarity, the yet-to-be decided resources (funding, FTEs) in Tables 9-10 could be flagged (as in Appendices) for a clearer view on what is known and expected of resource development and to support the following discussion on "Agency Request".

2) Funding and critical objectives

8. We appreciate that the EEA has foreseen an annex on ETC activities, but this annex is still empty (Annex 13). The SC will welcome this important information that corresponds to almost half of the operational expenditure of the EEA.
9. In its reaction to the SC Opinion on the SPD 2024-26, the EEA announced integration of the Copernicus Action Plan, but this has not yet happened in the draft SPD 2025-27. If the activity is still foreseen, it is important to include this in the SPD.

Overall, we recognize the continued and evolving efforts, challenges and ambition of the EEA, as reflected in the SPD2025-2027 with AWP2025, and look forward to supporting the EEA during its implementation.

Copenhagen, 11 June 2024

[Signed]

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Chair of the Scientific Committee