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LIFE Project Number  
**LIFE17 PRE BE 002**

**Final Report**  
Covering the project activities from 01/01/2018<sup>1</sup> to 30/07/2020

Reporting Date<sup>2</sup>  
**30/10/2020**

Implement for LIFE  
**Fostering Innovative Approaches to Strengthen  
Environmental Policy Implementation**

Data Project

<b>Project location:</b>	Brussels, Belgium
<b>Project start date:</b>	01/10/2020
<b>Project end date:</b>	30/04/2020 <b>Extension date:</b> 30/07/2020 <sup>3</sup>
<b>Total budget:</b>	€ 666,668
<b>EU contribution:</b>	€ 400,000
<b>(%) of eligible costs:</b>	60%

Data Beneficiary

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<sup>1</sup> Project start date

<sup>2</sup> Reporting date as foreseen in part C2 of Annex II of the Grant Agreement, as amended in April 2020

<sup>3</sup> As agreed in Article 1 of the Amendment No 1 of the Grant Agreement, signed April 2020

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**This table comprises an essential part of the report and should be filled in before submission**

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<b>Package completeness and correctness check</b>	
<b>Obligatory elements</b>	<b>✓ or N/A</b>
<b>Technical report</b>	
The correct latest template for the type of project (e.g. traditional) has been followed and all sections have been filled in, in English <i>In electronic version only</i>	✓
Index of deliverables with short description annexed, in English <i>In electronic version only</i>	✓
<u>Mid-term report</u> : Deliverables due in the reporting period (from project start) annexed <u>Final report</u> : Deliverables not already submitted with the MTR annexed including the Layman's report and after-LIFE plan Deliverables in language(s) other than English include a summary in English <i>In electronic version only</i>	✓
<b>Financial report</b>	
The reporting period in the financial report (consolidated financial statement <b>and</b> financial statement of each Individual Beneficiary) is the same as in the technical report with the exception of any terminated beneficiary for which the end period should be the date of the termination.	✓
Consolidated Financial Statement with all 5 forms duly filled in and signed and dated <i>On paper (signed and dated originals*) and in electronic version (pdfs of signed sheets + full Excel file)</i>	✓
Financial Statement(s) of the Coordinating Beneficiary, of each Associated Beneficiary and of each affiliate (if involved), with all forms duly filled in (signed and dated). The Financial Statement(s) of Beneficiaries with affiliate(s) include the total cost of each affiliate in 1 line per cost category. <i>In electronic version (pdfs of signed sheets + full Excel files) + in the case of the Final report the overall summary forms of each beneficiary on paper (signed and dated originals*)</i>	✓
Amounts, names and other data (e.g. bank account) are correct and consistent with the Grant Agreement / across the different forms (e.g. figures from the individual statements are the same as those reported in the consolidated statement)	✓
Mid-term report (for all projects except IPs): the threshold for the second pre-financing payment has been reached	N/A
Beneficiary's certificate for Durable Goods included (if required, i.e. beneficiaries claiming 100% cost for durable goods) <i>On paper (signed and dated originals*) and in electronic version (pdfs of signed sheets)</i>	N/A
Certificate on financial statements (if required, i.e. for beneficiaries with EU contribution ≥750,000 € in the budget) <i>On paper (signed original) and in electronic version (pdf)</i>	N/A
<b>Other checks</b>	
Additional information / clarifications and supporting documents requested in previous EASME letters (unless already submitted or not yet due) <i>In electronic version only</i>	✓
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*\*original signature by a legal or statutory representative of the beneficiary / affiliate concerned*

***Instructions:***

Please refer to the General Conditions annexed to your grant agreement for the contractual requirements concerning a Mid-term/Final Report.

Both Mid-term and Final Technical Reports shall report on progress from the project start-date. The Final Report must be submitted to the EASME no later than 3 months after the project end date.

Please follow the reporting instructions concerning your technical report, deliverables and financial report that are described in the document “Guidance on how to report on your LIFE 2014-2020 project”, available on the LIFE website at:

<https://ec.europa.eu/easme/sites/easme-site/files/report-your-life-project.pdf>. Please check if you have the latest version of the guidance as it is regularly updated. Additional guidance concerning deliverables, including the layman’s report and after-LIFE plan, are given at the end of this reporting template.

Regarding the length of your report, try to adhere to the suggested number of pages while providing all the required information as described in the guidance per section within this template.

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## 2. List of key-words and abbreviations

Aarhus MOP – Aarhus Convention Meeting of the Parties  
CIRCABC – EU Commission platform to share information  
Council WPIEI – Council of the EU Working Party on International Environment Issues  
CSO – Civil Society Organisation  
DEVCO – Directorate-General for International Cooperation and Development  
ECJ – European Court of Justice  
ECOSOC – the United Nations Economic and Social Council  
EDCs – Endocrine Disrupting Chemicals  
EEA – European Environment Agency  
EEAS – European External Action Service  
EEB – European Environmental Bureau  
EESC – European Economic and Social Committee  
EIR – Environmental Implementation Review  
IMPEL – European Union Network for the Implementation and Enforcement of Environmental Law  
INTERPOL – The International Criminal Police Organisation  
Law Working Group – group of EEB members that work on legal matters  
LTS – Long Term Strategy  
META – the EEB’s newsletter website  
NAT – Nature, Trade and Environment section in EESC  
NGO – Non-Governmental Organisation  
POPs – Persistent Organic Pollutants  
PRTR – Pollutant Release and Transfer Register  
SLAPP – Strategic Litigation Against Public Participation  
SVHCs – Substances of Very High Concern  
UNECE ECO Forum – the United Nations Economic Commission for Europe ad hoc coalition of environmental citizens’ organisations  
WGP-23 – 23rd Aarhus Working Group of the Parties  
WGP-24 – 24<sup>th</sup> Aarhus Working Group of the Parties

### 3. Executive Summary

The Implement for LIFE project was conceived to raise awareness on, and increase civil society engagement in, efforts to improve the implementation of EU environmental laws such as through the Environmental Implementation Review (EIR). The main project activities were on raising awareness among NGOs of the EIR to understand what the opportunities there are to influence the process constructively and to showcase good and bad examples of how laws are implemented nationally. A dedicated network of NGO legal experts, the EEB's Law Working Group, that would regularly exchange information on the barriers and opportunities that they face and see on the ground, was revived thanks to this project.

As well as galvanising the exchange of information within the network to analyse commonalities and varying practices in the Member States, this project sought to develop recommendations to policy makers on how to address poor implementation, highlighting good and bad practices. This was particularly important given that the EIR is primarily a process between the Commission and the Member States, without a uniform and clear structure for NGO engagement that would be able to reflect all of the experiences felt on the ground. In this regard, the advocacy actions aimed to enhance NGO engagement and collect relevant information that would reach policy makers, authorities and regulators. The pillars of the Aarhus Convention on environmental governance – access to information, public participation and access to justice in environmental matters – became obvious foundations for this work. A series of compliance reports, as well as reports focusing on environmental policy integration and rule of law, were published and widely disseminated.

Because the opportunity for a more varied and specific NGO engagement in the EIR is at national level, there were many dissemination and communication actions that accompanied the advocacy ones. Beyond the reports, featured articles, videos and podcasts were produced under this project, each exploring a specific issue to highlight the importance of NGO engagement in environmental policy. Each communication material was tailored, as far as possible, on single issues as it is challenging to attract the general public to procedural problems in environmental protection. In this sense, the project successfully integrated a number of work areas of the EEB, allowing for a concerted reflection on efforts to advocate for improved implementation. The project also allowed for a reflection on the EEB's internal organisational as a way to continuing to work on this issue which transcends environmental policy. While implementation is a slow and incremental process, this project was a success for the EEB to initiate and anchor its work on this issue. The EEB was able to raise awareness among its entire membership and incorporate work on improving implementation in its Long Term Strategy.

The project kicked-off later than planned, but all the milestones were eventually met and all the deliverables were produced. There are even some additional outputs and deliverables for the policy actions, given the opportunities to respond to policy developments during the project. The COVID-19 pandemic delayed the end date of the project by three months, due to the practical difficulties and necessary adjustments to working conditions that affected the last deliverables.

The evolving political landscape of the EU, in particular following the European Parliament elections and change in Commission, has indicated that issues of implementation and enforcement, as well as deeper integration of environmental policy, are now boosted in EU policy development. The Implement for LIFE project has equipped the EEB to be at the forefront of this development.

## 4. Introduction

The EU has a wealth of environmental legislation and is one of the world leaders in rules on environmental protection. However, implementation and enforcement of this legislation is sometimes poor and slow, and often does not result in the same level of protection across the EU. The environmental *acquis* is therefore an area of Union law that leads to most infringement proceedings, with the Commission also receiving numerous complaints directly from Union citizens. Failures to integrate environmental considerations into other policy areas, both at EU and national levels, has prevented effective environmental policy implementation.

The Environmental Implementation Review (EIR) process was set up with the intention of closing the implementation gap. Country specific reports are published in biennial cycles after dialogues between the Commission and the Member States. These reports are intended to identify significant implementation gaps that are both specific to Member States and those that they have in common so that they can be addressed at a horizontal level. The EIR process is not intended to replace enforcement efforts by the Commission, but rather to highlight problem areas or issues where Member States need to make more effort.

To understand the impact that poor implementation has on the ground, and the difficulties and successes of proper implementation, the EIR should be inclusive and participatory. This project sought to improve implementation practices on the ground by increasing the engagement of civil society. Based on their concrete experiences on good and bad practices in the Member States, they are able to identify root causes and difficulties from their practical perspective. By tackling implementation in a way that civil society believes is the best way forward helps bring the EU closer to its citizens. For this reason, it is paramount for environmental citizens' organisation to be able to play a constructive role in the EIR, to provide their own input into the process, share best practices in implementation and help ensure that effective remedial action is taken where necessary.

A strong input from civil society organisation can play a supportive role to the EIR and is an opportunity for both the EU and Member States to see how to further environmental integration so that policy incoherence does not prevent proper implementation of environmental rules. The engagement of civil society can pinpoint structural solutions to structural problems. Ultimately, more engagement and better implementation of rules increases both the certainty and acceptance of the law by all stakeholders, thus contributes to upholding the rule of law.

This project sought to liaise with NGOs, also beyond the EEB membership and environmental movement to enhance advocacy for environmental integration. This included the active involvement and collaboration with the Aarhus ECO Forum, liaising on issues of environment and human rights and environmental defenders, as well as joining a network of NGOs advocating for EU laws to protect journalists, activists and NGOs from so-called "SLAPPs". Engagement with a wide network of civil society shows how closely related and intertwined environmental issues are to social ones. The project looked at innovative ways that civil society can help improve implementation. But NGOs are not able to cooperate with authorities on the implementation of environmental laws if their role is threatened. Moreover, weaknesses in implementation often reflects a poor governance set-up, where procedures hinder the promotion of best practices on providing information to public or allowing decisions on the environment to be challenged.



The objective of this project was to raise awareness of the EIR process, trying to get civil society to actively engaging in the process and to help improve implementation at the national level. The increased engagement of organisations with direct experience on the ground, would inform the EIR process on ways to improve implementation and enforcement, including through better environmental policy integration. The revived EEB Law Working Group, which gathers environmental legal experts from across its membership, was the focal point for both gathering and sharing information about the different civil society perspectives and experiences across Europe. The Law Working Group met roughly every six months, and with the project extension managed to meet five times. The reports produced under this project have also been distributed to the network, supporters and stakeholders, and the recommendations and conclusions have been shared widely in public events and meetings.

Their attention on implementation and enforcement issues in environmental policy is now taking centre-stage at EU level. This is a demonstration that the discussions that first raised the need for an EIR process have now matured to recognising that implementation of environmental law and policy is now integral to cross-sectoral and high-level political discussions in the EU. This can be seen with the Commission's [European Green Deal](#) where each policy area stresses on the need for implementation, with particular attention to the EIR as a way to ensure that policies and legislation are enforced and deliver effectively. Since the 2020 European Semester cycle there are also reinforced interlinkages between the [Semester](#), the EIR process, and the [SGDs](#). Moreover, there is increased attention on the need to secure civil society space in the EU as a means to strengthen democratic processes, values and the rule of law. These affect all environmental advocacy efforts of the EEB and its members, therefore the actions of this project will continue to be highly relevant for the EEB's work beyond the project period.

## 5. Administrative part

The funding provided through the Implement for LIFE project enabled the EEB to hire two new fulltime staff at the EEB office at the beginning of the project. The new Legal Officer was hired as the project coordinator, supported by a new Communication Officer in charge of the extensive dissemination and communication actions of the project. In addition, for seven months two project assistants joined the core project team to further integrate policies on waste and biodiversity into the project, with the support of co-funding projects.

Over the course of the project, there was also a considerable general staff turnover. See annex C.1.1. for a full staff table. This also influenced the design of the training under action C2 (see details in section 6.1.). In October 2018 it was decided that agriculture (which is an area clearly linked to implementation of rules on biodiversity, water and climate change) and chemicals (e.g. EDCs, SVHCs, POPs and Mercury) would be added to the Implement for LIFE project. This addition was mentioned during the monitoring visit of 16 October 2018 and was included in the submission of the Progress Report.

The initial hiring process naturally led to a delay in the start of the project, but by the time the core project team was hired (Francesca Carlsson, Patrick ten Brink and Marie-Amelie Brun), the EEB was able to fully launch the project in the third quarter of 2018. The timeline of project activities was adjusted according to this delay and discussed with the Monitor in October 2018. The adjusted timeline was then approved after the Progress Report was submitted in January 2019 and activities were planned so that they could all be completed by 30 April 2020.

While this was in large part feasible, a 3-month extension of the project was granted in April 2020 due to the unforeseeable working conditions during the COVID-19 pandemic which delayed the last deliverables. The project was therefore duly completed on 30 July 2020, according to the amended Grant Agreement. Within the amendment request, a formal request to change address was made as the EEB's office moved in September 2018 to Rue des Deux Eglises 14-16, Brussels.

Despite the slow start of the project and the unforeseen and adapted working conditions at the end of the project, all activities were carried out successfully and all deliverables have been completed as foreseen.

## 6. Technical part

### 6.1. Technical progress, per Action

<b><i>A.1. Establishing network of EEB members and partners to engage in EIR</i></b>
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Foreseen start date:	Q1 2018	Actual start date:	Q2 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

#### Description of activities conducted and resulting outputs

The EEB engages with members and decides on actions through its Working Groups, of which there are 20. The Implement for LIFE core network is the EEB's Law Working Group. On 22 June 2018, the EEB organised its first Law Working Group remotely with 10 participants from 4 organisations, including the EEB (see minutes Annex A.1.1). There was good participation to the second Working Group with 24 prominent environmental legal experts from 14 organisations on 22-23 October 2018 (see Annex A.1.2 for the registration list). This meeting focused on access to justice which was the topic for the first compliance report under Action A2 and was an opportunity for members to complement and give feedback on the background report (see annex A.2.2). To prompt input from the wider EEB membership, other EEB working groups in the autumn 2018 were presented with the Implement for LIFE project (See Annexes A.1.2a-A.1.2d and annex A.1.3-A.1.9 for presentations and agendas respectively). In total, roughly 125 environmental experts were directly reached out to in the other working groups (Clean Air, Industry Coal, Agriculture, Circular Economy & Waste, Biodiversity and Water working groups).

The Law Working Group on 14 May 2019 (see Annexes A.1.10 and A.1.11), where issues of access to environmental information were discussed and presented, coincided with the EU Green Week, which theme was 'implementation'. The EEB organised an event during the [Green Week](#) and participated in others. This was an opportunity to bring together other NGOs and stakeholders that are engaged in implementation issues but outside the EEB membership. A biodiversity legal workshop was organised on 15 May 2019 that allowed experts from the Law Working Group and experts in the field of biodiversity to exchange experiences and learn from each other (see Annex A.1.12 for agenda).

The Law Working Group 8-10 October 2019 focused on environmental crime and due diligence, featured in the fourth compliance report of Action A2. The Working Group was followed by an [event on the European Green Deal](#) that was open to a wider group of stakeholders and presented 'Priorities for the European Green Deal and 8th Environmental Action Programme' report under Action A3. A fifth Working Group was held virtually on 30 March 2020, inviting officials from DG Environment to discuss with EEB Law Group members the developments on access to justice at national level (see Annex A.1.15 for list of participants extracted from zoom).

The project also sought to reach out to other NGO networks and cooperated on matters that were pertinent to the topics that were covered in the reports under Actions A2 and A3. The project therefore allowed for a deeper engagement in the UNECE ECO Forum, where the EEB had a key coordinating role for NGOs, at 2 Task Forces and 2 Working Groups of the Parties (see Annex A.1.16 for a list of events and key meetings). On top of this, the EEB participated in and presented in a number of events and meetings, to maximise the outreach of our work on improving implementation of environmental law. For this reason, several staff members were involved in this action through their participation in different meetings and events. The topics

covered in these events also informed some of the content relevant for implementing Action A3 (see below).

*Planned output and timeline, deviations and impacts on other actions*

The only output that had been planned for this action were 4 Law Working Groups. In the end, 5 Law WG took place, 2 remote (the last one due to the COVID-19 pandemic restrictions) and three in person in Brussels, coupled with other events. There was a deviation in the original timeline, but this was adjusted with the approval of a new timeline in the Progress Report. Therefore, the adjusted timeline of the Progress Report was followed. It was hoped that with the extension of the project by three months, in accordance with the Amendment to the Grant Agreement, it would have been possible to organise a sixth Law working group meeting in person in Brussels before July 2020. However, given the continued difficult circumstance of remote working during the project extension, this was not possible.

The topics covered in the Law Working Group meetings helped inform the content and focus for the Compliance Reports under Action A2. Other meetings and gatherings, such as the Aarhus Task Forces on Access to Justice and Access to Information and the Aarhus WGs in 2019 and 2020 were opportunities to gather information from other NGOs who are not formally EEB members, and were also platforms to present some of the case studies and analyses that were carried out for actions A2 and A3.

*Constraints and problems incurred:*

The initial constraint in delivering the action was due to the time it took to recruit the main people involved in steering the project (See Action C1) and that the project Grant Agreement was signed only in April 2018. The first Working Group only took place a couple of months after the signature, so in the end, this did not have an overall impact on the action or outputs. The last Working Group meeting on 30 March 2020 was originally intended to be held in person in Brussels, but due to the measures in place during the pandemic, this meeting was held virtually. While this was a missed opportunity for the members to gather and meet, we ended up spending less for organising five working group meetings than had been foreseen for four.

*Complementary action outside LIFE:*

This action was implemented deliberately in a very broad way, to maximise its impact and outreach. Implement for LIFE was presented in 5 different working groups that were not funded under the project (see annexes A.1.4 - A.1.9) and was advertised to the entire EEB membership in its activity reporting. In that sense, all EEB thematic working group meetings that took place during the time of the project complemented Implement for LIFE either directly or indirectly, given that implementation problems and NGO engagement with authorities to uphold environmental laws in the Member States is a cross-cutting issue.

*Perspective for action continuity:*

Thanks to the Implement for LIFE project, the Law Group at the EEB was revived, with additional members joining the working group meetings. The regularity of working group sessions, with the next one planned in November 2020, and the regular email exchanges on the dedicated mailing list, demonstrates that it is now a well-functioning and active working group in the EEB. Moreover, the possibility to engage with and coordinate the ECO Forum at UNECE led to the EEB updating an outdated external mailing list with NGOs who are involved in the ECO Forum. The updated mailing list, moderated by the EEB, is now comprised of more than 80 active civil society members and experts that have ECOSOC observer status from the EU and beyond.

With online meetings in 2020, we foresee that there will be reduced travel costs in the future. In fact, reorganising meetings online allows for more frequent and shorter meetings to take place. Because this requires a very low budget, the key factor for maintaining the the Law Working Group in its current form is to continue to promote engagement and exchange of knowledge via the mailing list and regular online meetings. (See continuation of the action in the After LIFE Report, Annex C.4.1.).

***A.2. Six-monthly compliance reviews with focus on nature, air, water, climate change, waste and circular economy policy and legislation***

Foreseen start date:	Q2 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

*Description of activities conducted and resulting outputs:*

As for many of the actions, there was a slight delay in delivering the first compliance report under this action. A lot of preparatory work was necessary before the series could be launched. This work was carried out by EEB policy staff and included to gather information from members active in their areas. This preparatory work is collected in a background document (annex A.2.1) which was used to consult the revived Law Group for designing the sequence of the four compliance reports.

Given that there were seven areas that needed to be covered in the compliance reports, with chemicals and agriculture added to the original five themes, the four reports were designed to each focus on a horizontal issue that impacted NGO engagement in the implementation of environmental laws of these themes. The first report, “*Challenge Accepted?*” (see annex A.2.2), was published in November 2018 and explored barriers and good practices that NGOs face when trying to challenge environmental decisions in different Member States. The second report, “*Power for the People*” (see Annex A.2.3) looked at the second pillar of the Aarhus Convention, public participation, and was published ahead of the European Parliament elections in May 2019. The third report, “*For Your Information*” (Annex A.2.4), was published in December 2019 and explored barriers and new opportunities for NGOs to access environmental information, based on the first pillar of the Aarhus Convention. The fourth compliance report, “*Crime and Punishment*” (Annex A.2.5) looked at how compliance and enforcement impacts implementation. A final summary report (Annex A.2.6) was published before the end of the project in July 2020.

The reports were widely shared with the membership and EU officials through the main EEB communication tools (see action B.2.), including at external workshops and events. The first report was shared directly with the Director General of DG Environment on 9<sup>th</sup> January 2019 during a meeting (see annex A.1.16 on significant meetings with officials for the project) and the EEB cooperated with the EESC’s NAT Committee for three expert opinions during the course of the project (see further in Section 6.3).

The second report was presented at the Green Week in 2019 and at the EESC, just ahead of the European Parliament elections. The reports were also presented at the Council WPIEI meeting ahead of the June Aarhus 23-WGP in 2019, where issues of public participation in international fora was on the agenda. Indeed, also the Aarhus Task Force on Access to Information 3-4 October 2019 proved very useful to both present some of the issues that were being explored for the third report, as well as to gather information on best practices and developments to fine-

tune the content of the third report. The fourth report on environmental crime was published in the context of the Environmental Crimes Directive REFIT. It proved very helpful to couple the research for that report with the REFIT process as we were engaging and coordinating with NGOs also outside the EEB network, so we were able to introduce them to the Implement for LIFE project. The report was also shared in meetings with officials in DG Justice and was a good basis to highlight issues with the Environmental Crimes Directive in discussions.

*Planned output and timeline, deviations and impacts on other actions:*

Despite the initial delay in publication of the first report, the extensive background document helped prepare and collect the necessary content for it. To catch-up on the delay of the publication, to make sure that the following reports would be published on time within the project duration, it was decided and communicated to the project monitor that the compliance reports would be planned every five months instead of six. See further section 6.2. describing the reorganised timeline and explanation of the choice of topics explored for each compliance reports.

The publication of each report was preceded by a Law working group meeting (Action A1) where the topic for that session was the same as the topic of the upcoming report. This helped the drafters complement some information with the direct input and analyses of the members during those working group sessions.

Co-funding for Implement for LIFE enabled us to integrate Laura Hildt and Darko Bizjak into the staff involved in the project (see annexed C.1.1.1). While supporting the project with, Ms Hildt focused her research on the implementation of biodiversity laws, resulting in a report on the compliance of Member States with CJEU rulings on biodiversity, published outside the scope of the Implement for LIFE project (see Annex A.2.10). Mr Bizjak supported research on waste and environmental crimes, and a series of fact sheets on EU waste law transposition were published in Q1 and Q2 of 2020 (see annexes A.2.7-A.2.9) co-financed by the MAVA foundation.

*Constraints and problems incurred:*

The delay of the publication of the first report was mitigated by replanning the publication of all the subsequent ones every 5 months instead of 6. With this new time plan, which was notified in the Progress Report, the four compliance reports were published before the end of the project. The final summary report, however, was published during the project extension period, in July 2020. See Section 6.2. and further details on deviations and corrective actions. Other than that, there were no other constraints or problems with this action.

*Complementary action outside LIFE*

In general, the research and drafting of the reports were an opportunity for EEB staff to identify commonalities and interlinkages with different work areas. While the research for the report ‘*Implementation of rulings for nature conservation: Court of Justice of the European Union case studies*’ was supported through this project, its publication falls outside the scope of Implement for LIFE as it came out in September 2020. And the waste law transposition fact sheets were presented at an NGO event in, Poland in August 2020; this event also falls outside the scope of the project.

There were two compliance reports published by the time the European Parliament elections happened. These were widely used and linked to the EEB’s work during the May 2019 elections (annex B.4.6), especially “*Power for the People*” as it featured more in-depth analysis of the importance of public participation in democracies.

Perspective for action continuity:

The publication of the four planned compliance reports and the summary report, were designed and thought in a way that they could continue to be relevant and be referred to in the EEB's work beyond the project period. All the reports are accompanied by recommendations that the EEB will continue to refer to. Moreover, they can also be used as reference documents that highlight some characteristics in the four topics that they cover. Also, the additional reports on the transposition of waste laws and the compliance by Member States with ECJ caselaw are extremely valuable reference documents for the EEB and its members to assess the situation of implementation in these areas in the future. During the research and collection of information and case studies that were the building bloc of the compliance reports, some information was gathered that could not be included in the publications, but which require further research and analysis to be published.

***A.3. Develop proposals for amending existing or developing new horizontal instruments to strengthen rule of law and improve environmental integration***

Foreseen start date:	Q3 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

Description of activities conducted and resulting outputs

A report on the gap analysis of existing legal instruments, focusing in particular on strengthening governance and the rule of law as a means to achieve environmental policy integration, was planned to be published mid-2019. In the end, two reports were published under this action: “*Priorities for the European Green Deal and 8th Environmental Action Programme*” (Annex A.3.1) in November 2019 and “*Reprotecting Europe: The EU Green Deal v The War on Regulations*” (Annex A.3.2) in January 2020. These reports gathered input from EEB staff and members, as well as the wider civil society who had the opportunity to provide input and contribute to the reports with their insights during events. See Annexes on information about the events organised around these reports.

As well as the reports, which are the deliverables for this action, EEB staff, in particular the EU Policy Director and the Legal Officer, had a series of meetings and participated in events to support the output of this action, and to maximise its impact. (See Annex A.1.16) for list of meetings and events).

To strengthen the message of the paramount importance to protect environmental defenders in a rule of law, this action supported the publication of a third report which was a research study conducted by EEB member Justice & Environment, “*The harassment of environmental defenders in the EU – a case study report*” (Annex A.3.3), published in December 2019. This report was not foreseen as a deliverable for this project and no extra expenses were included for the EEB supporting its publication and distribution. While it is outside the Implement for LIFE project, this report supports the horizontal policies that this action focuses on. (See further Action B8).

Planned output and timeline, deviations and impacts on other actions:

Due, in part, to the late start of the project, but also due to the unforeseen political developments, two reports were published under this action instead of one, just as the new Commission came into office. The monitor was informed of the need to adapt this action to the political windows of opportunity, but as it was clear that work and activities under this action were taking place

as planned, the delay in publication did not require a formal approval. Indeed, the preparatory work of two reports and their publication at that political moment made them very topical.

The high-level and horizontal topic of this action has meant that it has been an integral support to actions A1 and A2. Conversely, the multiple meetings and events and the revived Law Group (Action A1), as well as the research and reports under Action A2, have also been instrumental to the success and content of this action.

*Constraints and problems incurred:*

Due to the delay in the project it was not possible to publish the report before the European Parliament elections in May 2019. However, this was mitigated successfully by responding to the political outcome of the elections, see further section 6.2. There were no other constraints or problems with this action.

*Complementary action outside LIFE:*

The Legal Officer joined a network of NGOs, academics and activists advocating for legislation against a specific form of harassment: vexatious lawsuits against people and organisations with the intention to gag public discourse and information. These lawsuits are known as Strategic Litigation Against Public Participation, “SLAPPs”. This affiliation helped gather information of harassment within the EEB’s own membership and informed the EEB of the types of threats that environmental activists and organisations increasingly face in Europe. The EEB provided input to a research paper led by Greenpeace on SLAPPs (see Annex A.3.4) and was part of a Green10 delegation during an online meeting with Vice President Jourova’s cabinet on 29 July 2020.

In general, this project has complemented the policy efforts in all of the EEB’s work precisely because it spanned across different areas and because the implementation of EU environmental laws is an overarching issue in environmental protection and is raised in high-level discussions in the EU institutions. See further details on action C2 on how the training actions have helped to integrate implementation issues in the EEB’s Long Term Strategy and organisational development.

*Perspective for action continuity:*

This action was successful in linking the high-level issues of Rule of Law and good governance with the more technical problems of poor implementation of environmental laws. Since the new Commission came into office, integration of environmental policy is a more prominent issue than before as can be seen in the [European Semester](#), but also by the fact that the [European Green Deal](#) was at the top of the Commission’s [political guidelines](#) for the next few years. This is also the case for the need to strengthen the rule of law in the EU, with more examples of ways that civil society is sidelined in the Member States. Good governance and the principles that should underpin that, including the pillars in the Aarhus Convention for environmental governance, is paramount for tackling issues of rule of law and poor implementation of rules. With DG Justice’s yearly Rule of Law reports and the collaboration in the network of journalist, academics and NGOs on SLAPP, the EEB will continue to work on integrating environmental policy with issues of Rule of Law and governance.

Additionally, implementation and enforcement are key elements in each of the areas of the European Green Deal, which the Commission has to now put into action. The announcement of the 8<sup>th</sup> Environment Action Programme highlights many of the aspects that the EEB included in its reports under this action, so we will continue to make sure the 8EAP becomes a reality.



## **B. Communication actions**

### ***B.1. Support preparation of the five reports under Action A2 to support national level NGO communication on implementation of EU environmental regulation.***

Foreseen start date:	Q1 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

#### Description of activities conducted and possible resulting outputs:

The Communications Officer supported the preparation of the reports published under the project in November 2018 (A.2.2 “[Challenge Accepted?](#)”), May 2019 (A.2.3 “[Power to the People](#)”), December 2019 (A.2.4 “[For your Information](#)”), March 2020 (A.2.1.5 “[Crime and Punishment](#)”). The tasks under this action included: laying out of the reports, supporting the gathering of cases from member states, participating in meetings about content, writing case studies and interviewing NGOs.

The reports covered many EEB’s thematic areas, including nature, air, water, climate change, waste, circular economy, agriculture, chemicals. The EEB used its resources and network to gather cases from members and benefited from the expertise of other colleagues from the Policy Unit. The Law working groups organised in the EEB were privileged moments to gather these stories and experiences. The reports are published on the EEB website under [the Implement for LIFE category](#) created for the project and the project page. Their length exceeded 10 pages as we featured as many examples from our membership and other NGOs working on the ground as we could and from a great variety of member states. The reports remain accessible to a general audience on the project webpage, which will be maintained and updated for as long as implementation will be an issue we work on, as well as in the EEB library.

#### Progress made and deliverables:

**Distribution of the report** – The reports were distributed through two main channels: our membership and our newsletter (Annex B.1.1). We shared the reports with our membership through e-mail lists that the EEB uses to stay in contact with its members. We also shared the report through the EEB newsletter, that is sent to environmental NGO leaders, staff, EU officials, members and supporters across the EU. Articles were also published to support the spread of the report on META. [META](#) is the EEB’s dedicated news channel, where regular news is published on all the topics relating to the work of the EEB. As the project progressed, we also identified the need to send the reports to a more targeted audience and elaborated lists of key actors working on the implementation of environmental laws. This helped us to maximise the reach of the reports and make sure that it was sent to relevant actors of implementation. Thanks to that, we received direct reaction to the reports that served us in the redaction of the next ones and enriched public dialogue.

The first report was distributed to 4,700 people via EEB’s newsletter. The second report was distributed to 5,271 people via EEB’s newsletter. The third report was distributed to 5,796 people via EEB’s newsletter. The fourth report was distributed to 6,031 people via EEB’s newsletter. The two-year synthesis report was sent to 8,345 people via EEB’s newsletter. The previous figures show that the readership of our newsletter increased a lot since 2018. Articles written on META about the reports also gathered readership. The article about the first report was read 167 times, the article about the second report was read 228 times, the articles about the third articles was read 218 times and the article about the fourth report was read 207 times. (Annex B.4.1)

### **Impact of the reports –**

The four reports published under this project looked at core barriers to implementation at member state level. Our members and other NGOs' experiences reflected these difficulties and we provided cases and best practice to help them in their work. Our aim was to increase awareness of citizens and NGOs environmental rights to improve the implementation of environmental laws. We believe that the space of NGOs and citizens is crucial to ensure that laws are implemented and so that our environment is protected. The reports cover the three Aarhus Convention's pillars, namely access to justice, public participation and access to information and the fourth focuses on environmental crimes and their impacts on the EU. The reports aimed to increase awareness of implementation barriers and opportunities for NGOs to engage in implementation of environmental law at national and local level. The reports were one step of the process that opened up the discussion and helped us make concrete demands for a better implementation of the Aarhus Convention and of environmental laws. This step was broadened by the work done during the working groups and the frequent exchange in the Law mailing list.

The reports were designed with the participation of the Law Working Group and with the intention to reach NGOs and to be as helpful for them as possible. We heard positive feedbacks from many NGOs. Some reached out to the EEB with cases ([featured on META](#) and in the reports, e.g.: Annex A.2.3 Power for the people - April 2019, page 7) which enabled better exchange on the subject. (for all META articles see annex B.4.1)

#### *Constraints and mitigating actions:*

The first report was planned for June 2018 but could only be published in November 2018. The organisation for the publication for the next issues were moved forward accordingly (see Action A.2 and the timeline in section 5.2. below).

In July 2020, the two-year synthesis report (Annex A.2.6) was published by the EEB. It gathered the most important findings and recommendations of the EEB regarding the implementation of EU environmental laws and more specifically the implementation of the Aarhus convention in the EU. Due to the publishing date of the report, mid-summer, we decided to postpone the communications actions surrounding it. Our members and most of the EU bubble were already on holidays at this moment, so we waited for the 'reentrée' to send the report to our membership and to publish and share a META article summarizing the project. The article was then shared through our newsletter – that does not run in August. A video compiling the main information of the project was released early summer to shed lights on the project and its action. It invited viewers to read our reports and work.

#### *Complementary action outside LIFE*

Under the project we helped Justice & Environment, one of EEB's member, in the lay-out and writing for the foreword in one of their reports (Annex A.3.3).

#### *Perspectives for continuing the action after the end of the project*

The reports are great resources for our work on the Aarhus convention and we will continue to link back to them in other publications or articles published on META.

During the preparation of the second report on public participation, the EEB started to develop a database on the different online platforms in the Member States that are used for citizen and NGO participation, for instance through EIA or SEA procedures. The EEB membership was asked to help verify the information first gathered by the communications officer. The

development of this database is foreseen be continue after the end of the project and could feature as a continuation of an A2 action (See After LIFE plan Annex C.4.1).

***B.2. Prepare and distribute communications tools for national level NGOs to use to support their work on the implementation gap reports***

Foreseen start date: Q1 2018      Actual start date: Q4 2018  
Foreseen end date: Q4 2019      Actual end date: July 2020

*Description of activities conducted and possible resulting outputs:*

The action B2 has been completed for the four reports published under the project. The Communications Officer prepared four toolkits to support the publication of the compliance reports and its dissemination.

*Progress made and deliverables:*

**Preparation of toolkits** - The preparation of the four toolkits was done in accordance with the members' needs. To determine these needs, a survey was sent to all the members in the Law Working Group so that the toolkit met their expectations and capacity. The Law Working Group held on 22-23 October 2018 was also a way for members to explain what they expected from the report (format, length...).

According to the results of these exchange, the communication officer prepared press releases to support the six-monthly reports. The toolkit sent to the members included six visuals each, one video and one press release that could be adapted and translated by the members. This preparatory work was sent to the membership to engage them with the publication of the report (Annexes B.2.1 to B.2.15). We got informal positive feedbacks from our partners about the reports, that were interesting and instructive.

**Distribution of the toolkit** - The toolkits created to help the dissemination of the reports were distributed to the members of the Law Group and to the communications teams of these organisation. They were encouraged to use the material shared (Annexes B.2.4, B.2.7, B.2.10 and B.2.13) as was done by some members that published [our press release on their website](#) and another one that [wrote articles on our reports](#) (more example in Annex B.2.16).

*Constraints and mitigating actions:*

**Distribution of the report –**

The reports were distributed to our lists of journalists. The Communications Officer in agreement with the Communications Manager decided to send the reports to a smaller number of journalists than foreseen in the proposal. Relationships with journalists are key for the EEB and we decided to target the journalists we would send the reports to rather than send it to the complete lists.

The first report was distributed to 636 journalists or press specialists. The second report was distributed to 259 journalists or press specialists, this diminution was a choice made by the Communications Officer that decided to target the journalists. The third report was distributed to 562 journalists or press specialists and the fourth report was distributed to 626 journalists or press specialists. The number of journalists contacted via our mailing lists was lower than expected in the proposal, but it should be noted that journalists are also subscribed to our newsletter where all the reports were featured.

**Impact of the report –** The reports were featured in several news outlets (B.2.16). The report distribution via our newsletter (B.2.16) was the occasion to reach a large part of Civil Society,

the EEB's network is subscribed to the newsletter and we encourage them to share it with their own network.

Constraints and mitigating actions emerge from the action B2. First, engaging members was unsuccessful. After the survey's results and the discussion during the working groups, we decided not to translate the toolkits envisaged in the proposal. This choice was also motivated by the lack of budget to dedicate to this activity. And despite the prior screening of their needs the members didn't use the reports as communications materials. We noted a great interest for the reports as resources and interesting overview of EU's situation, but there was no real use of the communications tools provided.

The topic of the reports and their expert nature was not favourable to media engagement. For this kind of project, the EEB should aim in the future to focus its communications and objectives towards decision makers rather than the general public. The EEB tried to make the subject as interesting as possible for citizens but it was only a mid success, as it was mostly relevant to policy makers, regulators and stakeholders. One thing that can be noted is the interest of people for articles that [talked about basic concepts in an explanatory way](#). The development of a library of articles where concepts will be explained in simple terms is necessary for the EEB as a whole to be able to talk about more complicated subjects, as well as more social media activism that would break down the subject and make topics more accessible and easier to disseminate.

However, this also reflects the nature and structure of the EEB with its size and diversity of member organisations. This means that the EEB is not comparable to other large environmental organisations who do not have a membership or whose membership is more uniform and work on the same issues.

Second, we could not reach the foreseen media hits. Reaching to the 15 media markets per report expected in the proposal was not possible, but despite the low interest of the press for our issues, we are certain that our work helped and supported many NGOs around Europe. Through our exchange during the law working group, individual emails or social media, we did reach a lot of citizens and environmental groups and contributed to highlight the implementation problems in the public debate.

#### Complementary action outside LIFE

The communications officer carried out a social media training for the law working group, in the objective to strengthen their role on social media and encourage exchange with the EEB. The training was well attended and we received several emails thanking us for this initiative that was useful for organisations that don't have the possibility or the resources to dedicate a lot of time and energy to social media. The EEB's aim is to develop more trainings for its members to encourage interaction with them and empower the membership, see further in the After LIFE plan (Annex C.4.1).

***B.3. Develop a section of our news website dedicated to highlighting implementation gaps in environmental regulation, as well as innovative and best practice solutions.***

Foreseen start date:	Q1 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

#### Description of activities conducted and possible resulting outputs:

The Communications Officer developed [a section on the META website](#) (Annex B.3.1) gathering the different pieces of news written during the duration of the project. The blog posts, videos and audio were published on the META website, as well as in other platforms: YouTube,

iTunes, Spotify, social media. A sidebar on the META page indicates details about the project and funders and has a link to the project webpage. This sidebar is also displayed on every article and features the project’s logo, LIFE logo and disclaimer.

*Progress made and deliverables:*

The META website has been the heart of the content in terms of general communications. Accessible to all and simple to read, the articles were shared on the website and newsletter and were a very public facing tool to reach a broad audience of concerned citizens and NGOs. The actions created under B4 can be found on this page (Annex B.4.1).

*Constraints and mitigating actions:*

The page did not attract as many visitors as expected, as it was a library of articles. As most of our views come from our newsletter, social media, press release, or other articles, the links lead to the articles and not to the general page. The articles were successful in engaging and making the issues accessible to a larger number (Annex B.4.1). Considering that META was launched in 2017 and the capacity of dissemination of the newsletter, the numbers achieved during the project are coherent and show an increase as well as some tendencies in our readership, we note more engagement towards positive stories. This is a lesson learnt for the EEB and one of the direction that emerged from our new strategies, we now follow always try to adopt a positive attitude toward news, not downplaying what is at stake but showing the opportunities for improvement.

We also noted special interest in articles explaining the system and the rights that we all have to make sure the environment is protected. The readership of META increased a lot during the past two years (from 8,000 people subscribed to the META newsletter to more than 15,000 at the end of the project) and issues of implementation are a recurrent topic in the articles published on the website, under this project and also under other projects. We believe that the EEB has a special role in holding into account governments and shed lights on the implementation gaps that are often close to people’s daily lives and impact greatly their environment.

The META section on the website is a library of all the content hosted on the website. This section does not require more work than feeding the section with new articles or content.

*Perspectives for continuing the action after the end of the project*

The section on the META website will stay open and active. The library of articles is accessible to all and thanks to the general articles that were written during the project we can link back to some of the content developed under the Implement for LIFE and so allow for a continued dissemination of the work. The META website is one of the flagship products of the EEB and we intend to continue creating content on the channel in the next years.

***B.4. Creation of regular digital content to inform NGO leader, staff, members and the public, on innovative ways to solve and highlight environmental regulation***

Foreseen start date:	Q1 2018	Actual start date:	Q1 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

*Description of activities conducted and possible resulting outputs:*

Before the Communications Officer for the EIR project started, the creation of articles was shared among other staff until June 2018. The Communication Officer continued to create

regular content to shed light on implementation gaps or successes. Blog posts (Annex B.4.1), videos, and podcasts (Annex B.4.2) were created with the aim of informing NGO members as well as the public on the issues surrounding environmental regulation.

The Communication Officer wrote articles and both positive and negative examples were featured on the website. The aim of the action B4 was to show that implementation is an issue that can be overcome, and that good practices can be found in the EU. The EEB Working Groups were very effective to interview members on their experiences, to collect data and stories that are relevant to the Implement for Life project. The EEB showcased member examples and make sure to bring a variety of subjects in the articles. We also developed more general articles that explain the different rights under the Aarhus convention and the implications they have on once daily life, as well as some articles made to showcase the reports. Aside from the META website, articles were also published in the printed version of META magazine distributed both virtually and in print to all members of the EEB and decision-makers (Annexes B.4.5 to B.4.10). The META issued in Spring 2019, was covered by the Implement for LIFE project as it was directly linked to the election and the implementation issue (Annex B.4.6). The printed version of META goes to around 350 people each time to EEB members, partners, decision-makers, EU officials.

#### *Progress made and deliverables:*

Articles have been published regularly on META to inform the public and the NGO community on the cases that illustrate the importance of engaging civil society on how to implement legislation. The articles attract a regular number of readers (Annex B.4.1). More than 50 blog posts were published under the category on META over the course of the project. As well as 17 videos and 7 podcasts (Annex B.4.2). In order to promote our work, we also created visuals for the podcasts (Annex B.4.3).

Moreover, a poster on the potential for NGO engagement throughout the policy cycle was printed and used during the Law Working Group (Annex B.4.4). This poster proved to be useful to EU officials and was re-used in a Commission presentation during the stakeholder meeting on Environmental Compliance Assurance (See slide 3 in Annex C.3.1.) on 30<sup>th</sup> November 2018.

#### *Constraints and mitigating actions:*

During the first meeting of EASME, we identified that the point 1 and 2 of ‘expected results’ were similar and describing what appeared to be the same elements. We agreed that a total of 25 blog posts would be published each year of the project on the META website.

Because of the COVID-19 restrictions the podcast programme could not be continued. Instead of making the 10 podcasts initially envisaged, in agreement with the external monitor we shifted to more videos that were easier to organise as we didn’t have to meet in person to make the videos. Therefore 7 podcasts were published in total and 17 videos.

The blog posts, videos and podcasts were less regular than foreseen in the proposal, as we focused on the news and the different current stories that we were aware of, we timed our publications with the release of the reports, cases from members and other exterior factors.

#### *Perspectives for continuing the action after the end of the project*

The podcasts, videos and blog posts will be maintained live on the META website. After the project’s end, we continue to publish related items and add them to the project category in META. Implementation issues are still very current and we will keep writing about them.

*Podcast changes* - To maintain the podcast online, the EEB subscribed to a platform called Buzzsprout. Because of the Covid-19 crisis, the recording of podcast was halted. We planned

to make a series of podcast about energy transition and more specifically on the transition out of coal. This series will still be made and appear in Spring 2021.

Another series of podcasts is in the making and is about the cities of tomorrow, as mentioned in the After LIFE plan. We are talking with experts from policies and the health sector about air quality, energy transition and economic transition in the cities. In this series that will be available this autumn on our network, we want to link the EU and local level and show bottom up initiatives that influence decision-making.

### ***B.5. Distribution of the online content through email newsletters and social media***

Foreseen start date:	Q1 2018	Actual start date:	Q2 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

#### *Description of activities conducted and possible resulting outputs:*

Content created under the project was distributed through the META weekly newsletter that goes out to citizens, NGO leaders, staff, members, journalists every week. The newsletter is composed of articles published by the Communications team of the EEB and a section dedicated to members. Articles were also featured in the META magazine, that is sent digitally and in paper format to members, MEPs and Member State politicians and distributed digitally to all our network.

#### *Progress made and deliverables:*

The work published on our channels helped to grow our audience a lot and we notice a great large increase in numbers of followers in all of them. We registered 17,000 followers on twitter in 2018 when we now have more than 31,000 followers. And the newsletter counts now more than 8,000 subscribers, compared to the beginning of the project where we had 4,700 subscribers.

**NEWSLETTER** – The newsletter has had an opening rate of around 20% during the course of the project. The objective was to reach 25%, and despite the steady growth of the opening rates since the development of the news website, the objective was not reached (Annex B.5.2). The newsletter openings are continuously monitored by the EEB and we continue to gather the data on our audience growth and reach after the project.

**TWITTER** – (Annex B.5.3) The project proposal stated that tweets about the content of the project were supposed to reach in excess 30k monthly. This rate has not been reached every month of the project but our twitter presence has improved in accordance with the social media strategy put in place by the EEB and aiming to develop the voice of the EEB (Annex B.5.4). On average 50 tweets were published each year about the project and its deliverables. The Twitter channel of the EEB is followed by MEPs, national experts, institutions, NGOs, journalists etc. And one of the articles written for the project was retweeted by Natalie Bennett, a green MEP (Annex B.5.4).

**FACEBOOK** – (B.5.1) The Facebook posts published during the project have reached on average more than 1K which is on target with the foreseen outreach, and we observed that our Facebook following base grew during the project, reaching more than 10,000 followers by the end of the project.

#### *Constraints and mitigating actions:*

The EEB communications team developed different strategies in 2019 to improve our communication, including a social media strategy. We investigated our functioning and look

for solutions to make sure that we were developing a coherent voice for the EEB on social media. During this process we changed our use of twitter and tried to limit tweets. Thanks to that our communications on social media is more sleek and coordinated although this was not sufficient to help us reach the twitter count expected in the proposal. As an organisation we published fewer tweets in the last year and we deliberately decided to be very precise and concise to make our messages clear and engaging. This strategy paid off as we can see on the statistics that the engagement on each tweet increased.

While we were closed and reached **26K** the target set to have 30K reach on average each month was not met. However, the strategy as a whole allowed for a much better communication and will beneficiate the EEB's impact in the long term including future work on implementation.

*Perspectives for continuing the action after the end of the project*

The EEB will continue working on the implementation issue and we will keep communicating about it.

***B.6. Notice board for the project***

Foreseen start date:	Q1 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	Q4 2018

*Description of activities conducted and possible resulting outputs:*

The action B6 started in October 2018 and was completed the same month. Two roll-ups (Annexes B.6.1 and B.6.2) were designed, printed and they are on display in the EEB office. A project logo was developed to make the project more recognisable (Annex B.6.3).

*Progress made and deliverables:*

The roll-ups are present in the EEB offices and are used during events. They have appeared during all the Working Groups and events taking place in the EEB office since October 2018. As the role ups can be carried to meetings and events, they also featured during two EEB's Annual Conference in November 2018 and November 2019 in Berlin.

*Constraints and mitigating actions:*

No constraints or mitigation actions.

*Perspectives for continuing the action after the end of the project*

The roll-ups can continue to be used during meetings and events, and will be kept in the EEB office.

***B. 7. Webpage for the project***

Foreseen start date:	Q1 2018	Actual start date:	Q2 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

*Description of activities conducted and possible resulting outputs:*



The action B.7. started in June 2018 and ended in July 2020. [The webpage of the project](#) was designed and put online in August 2018 and is hosted on the main EEB website. This page contains information on the Implement for Life project and contact details. All major publications under Actions A.2. and A.3. are published there as well as links to find all the contents developed under the action B4. The [META webpage](#) is used to feature stories from our members across the EU about implementation issues while the page on eeb.org is there to explain the project. The sites are therefore complementary to each other and are equally important for the project.

*Progress made and deliverables:*

The project webpage is running, and we refer anyone who wants more information on the project to the webpage. When needed the page is updated by the Communications Officer.

*Constraints and mitigating actions:*

The Implement for Life page did not attract a lot of viewers (Annex B.7.1) as most of the traffic is directed to the META website where an explanation of the project is always displayed on the side of the articles. However, we can note that most traffic was directed to the actual products delivered during the project: reports, videos, articles, our social media posts.

*Perspectives for continuing the action after the end of the project*

The page will remain online indefinitely and feature the work accomplished during the last two years. If needed, we will update it with any new information about implementation issues.

<b><i>B.8. Networking with other projects</i></b>
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Foreseen start date:	Q1 2018	Actual start date:	Q4 2018
Foreseen end date:	Q4 2019	Actual end date:	July 2020

*Description of activities conducted and possible resulting outputs:*

The EEB was able to network with other LIFE projects during the course of Implement for LIFE. In particular, there were synergies with the LIFE EARL project (LIFE16 GIE/CZ/000791), and there was particular coordination between our projects on the issue of access to justice. We also networked with the LIFE13 ENV/UK/000549 and attended their [event](#) with Interpol in Brussels, 12-13 November 2019. This was especially useful for our research on environmental crime. Moreover, within the context of supporting the publication of “[The harassment of environmental defenders in the EU – a case study report](#)” (Action A3), we networked with their LIFE core grant.

*Progress made and deliverables:*

Our networking with the EARL project resulted in coordinated efforts to advocate for increased access to justice for NGOs at Member State level, as well as at EU level. Networking through the SMART LIFE project provided valuable insight into the implementation of different environmental legislation and how various difficulties in enforcement are an obstacle. Both these projects helped with input for Action A2.

The EEB’s presence and organisation in the 2019 Green Week was also an opportunity to meet other people in LIFE projects. For instance, during a [session organised by the EECS](#) on the role of civil society in implementing laws, there was a good exchange with the LIFE Rich Waters, an IP project in Sweden, and we were able to share objectives of our projects.

In order to engage with the LIFE constituency, we shared our reports and social media work with the LIFE communications team.

Perspectives for continuing the action after the end of the project

The EEB will keep working on implementation issues and the work done with our members and other NGOs is essential to have an impact and contribute to significant changes. The relations build during the project will be of great help for the following projects that we will be part of.

**B.9. Layperson’s report for the project**

Foreseen start date: Q1 2018      Actual start date: Q2 2020  
Foreseen end date: Q4 2019      Actual end date: July 2020

Description of activities conducted and possible resulting outputs:

The action B9 started in April 2020 and ended in July 2020. A layperson’s report was prepared to outline the key lessons of the project and an overview of the work done during the two precedent years (Annex B.9.1). It is a short and very visual document that can be read easily and reflect the EEB’s work.

Progress made and deliverables:

The report was published in June 2020 alongside a video to illustrate our work (Annex B.9.2). We published the report on the EEB website and promoted it on social media as well as the video. The report was shared with the LIFE communications team so that they could publish it on their channel.

Constraints and mitigating actions:

The report was not shared with the membership as planned within the project duration, because of the summertime during which hardly anyone would read it. In order to mitigate this, an article was published on the META website in September 2020 – a moment in the year with more affluence to our websites – and the law working group members were informed about both publications.

The newsletter featuring the report was sent to 8,345 citizens, NGO leaders, staff, members and supporters.

Perspectives for continuing the action after the end of the project

The layperson’s report is a really nice document that the EEB will use to showcase its work for other fundraising and public events. We tried to make it as accessible as possible to make sure that it could be read by anyone interested in our work and wanting to discover more about the core values of work of the EEB.

**C. Project management and monitoring of the project progress**

**C.1. Project Management**

Foreseen start date: Q1 2018      Actual start date: Q1 2018  
Foreseen end date: Q4 2019      Actual end date: July 2020

### Description of activities conducted and resulting outputs

To ensure effective management of this project, the recruitment of a fulltime position for a legal expert for the project management was necessary. The Policy Director was project manager during this recruitment period, with the support of the Secretary General, the Financial Director, Communications Director and Events Manager. The Legal Officer started to work at the EEB part-time in September and then fulltime in October and was able to coordinate the project as soon as she joined. A Communication Officer working specifically on the Implement for Life project was hired full-time in June 2018 to carry out the communications action. Two project assistants joined the core team in the latter part of the project, to focus on issues of biodiversity and waste, thereby also helping to integrate other EEB work into the project. See annex C.1.1 for a full staff list.

Weekly meetings between the Legal Officer and the Communication Officer were held to monitor the project actions. These meetings included the project assistants for the time that they were engaged in the project. Given the transversal nature of the project, relevant actions were coordinated with the advice and oversight of the Secretary General, the Policy Director, and when necessary required the involvement of other policy experts.

### Planned output and timeline, deviations and impacts on other actions

There was a natural slow kick-off of the project during the initial phase of hiring new staff. However, highly competent and motivated staff was hired and able to implement the project so that all actions were successfully fulfilled.

Experience of the project management, in particular the hiring of new staff and expansion of the office in general, informed the choice of training under Action C2.

### Constraints and problems incurred

Apart from the natural delays in hiring new staff, there have been no particular constraints. The planning of the project and the coordination with staff to manage everyone's time and workload efficiently, has been possible by adapting the timeline of the project during the time of the Progress Report and when making the project amendment request. As a result, all the actions were carried out as planned by the amended project end. The inclusion of extra themes to the project has also led to managing a larger group of staff than originally foreseen. The scope of this project, its horizontal reach and the number of staff involved prompted the need for a training that took into account broader organisational development issues (Action C2).

### Complementary action outside LIFE

As part of the overall organisational development adjustments necessary with the increased number of staff in a relatively short period of time (see Action C2), we have secured funding for the development of a new administrative tool for the organisation that is expected to be implemented soon.

### Perspective of action continuity

The project management for this project will not continue after the project end.

## ***C.2. Training of EEB policy staff and member organisations in understanding and supporting innovative methods of implementation***

Foreseen start date:	Q3 2018	Actual start date:	Q2 2019
Foreseen end date:	Q4 2019	Actual end date:	July 2020

### Description of activities conducted and resulting outputs

In 2019, the EEB (including staff, board and members), developed a 10-year Long Term Strategy (LTS). Staff engaged the members directly during the spring Working Groups in Q2 of 2019 and brought together all the input from the members during Q3 of 2019. In Q4 of 2019 the EEB's LTS was approved during the Berlin Annual General Meeting (19-20 November 2019).

Efforts to improve the implementation of environmental laws was identified as a horizontal issue. (See Annex C.2.1. on the Theory of Change chapter of the LTS developed for the horizontal issue of Environmental Justice and Law). Multiple reasons were behind the choice for an organisational training following the approval of the LTS. Firstly, the clear political signal from the Commission in its European Green Deal that implementation and enforcement were key horizontal priorities in environmental policy, thereby confirming the importance to organise our efforts accordingly. Secondly, the rapid growth of the EEB, with a growing membership and growing number of staff, necessitates additional tools and processes for enhanced coordination. Thirdly, with the need to develop shorter term priorities to reach the long-term goals in the LTS, and the cross-cutting pressures and needs for improved implementation across all thematic areas, it became clear that an organisational development training was necessary. The Brussels-based consultancy, ODS Support, specialised in organisational trainings for NGOs was selected after interviewing and receiving quotes from three candidates. The selection process was organised by the Legal Officer and Membership Manager (See annex C.2.2 for request for quotes and C.2.3 for offer). The consultants did preparatory work for the training in the form of interviews with supervisory staff in Q1 of 2020. The basis of these interviews helped the consultants to conduct a training in July 2020 which was tailored to our needs and a report with recommendations and next steps was provided

*Planned output and timeline, deviations and impacts on other actions:*

Two trainings were planned for this project, one for EEB staff and the other for the Law Group. The trainings for this project were integrated to the wider organisational exercise to develop a Long Term Strategy (LTS), envisaging actions and priority areas for the EEB in the next 10 years. This was developed through the engagement of members in each Working Group in Q2 of 2019 and also among EEB staff, with a special brainstorming workshop in July 2019 during the staff retreat. The LTS was then approved by the Board during the Annual General Meeting in Berlin on 19-20 November 2019. The organisational development training that was planned to take place in Q1 of 2020 had to be postponed due to the COVID-19 pandemic restrictions, and therefore an extension of the project was sought to ensure the training could take place. The idea was to equip EEB staff with organisational development tools that could also be applied during their Working Groups to help set priorities and help with developing yearly workplans with the members, in coordination with EEB staff. While the staff training took place in July 2020, in accordance with the Amendment to the Grant Agreement, the follow-up training with the Law working group was not possible before the project end. See further in section 6.2. on how that deviation was handled.

*Constraints and problems incurred:*

A special organisational development training had been planned for EEB staff in April 2020 but which had to be shifted to July 2020, and which did eventually take place. This was one of the main problems that led us to request an extension of the project by three months. It was hoped that a training with the Law Working Group could follow after the staff training, but this was still not possible due to travel restrictions. See further Section 6.2. explaining the impact this had on Action A1 and the corrective measures taken.

### Complementary action outside LIFE

As part of the overall organisational development adjustments necessary with the increased number of staff in a relatively short period of time (see Action C1), we have secured funding for the development of a new administrative tool for the organisation.

### Perspective of action continuity

For 2021, it is foreseen that all staff who oversee an EEB working group will receive training on monitoring and evaluation of the EEB's Long Term Strategy.

## **C.3. Impact Monitoring (including socio-economic impacts)**

Foreseen start date:	Q1 2019	Actual start date:	Q1 2019
Foreseen end date:	April 2020	Actual end date:	October 2020

### Description of activities conducted and resulting outputs

After the first monitoring visit in 16 October 2018 with Christy Duijvelaar from Neemo, the KPIs for the project were included in the webtool for verification in January 2019, before the submission of the Progress Report. The final values for the KPIs were then updated at the end of the project in July 2020 and are reported on in Section 7.

The socio-economic impact of the project is more qualitative than quantitative, with tangible results that could be felt in the future (see further section 6.3 on policy impacts). Indicators of positive socio-economic impacts have been identified early on in the project. On 30 November 2018, officials in the Commission used the diagram of our project poster (action B.4.) to illustrate the key entry points for NGOs to influence implementation (see Annex C.3.1 extracted from CIRCABC). The Implement for LIFE project reaches out to the whole of the EEB membership, which now represents 161 organisations and around 30 million people. The actions are targeted to EU officials, Member State officials and authorities, inspectorates and wider institutions (i.e. the EEA, IMPEL, EESC – see also events listed in annex A.1.16), NGOs and legal experts. The EEB publications and communication on the project has the potential to reach out to all the 30 million people it represents. See Annex B.8.1 the considerations to realise this potential and the lessons learned from this project.

### Planned output and timeline, deviations and impacts on other actions:

The planned reports, including this one, were duly submitted on time. The date to submit this Final Report was revised to reflect the three months after the actual end date of the project according to the amended Grant Agreement, so three months after 30 July 2020. The monitor, Christy Duijvelaar, was kept informed of the project developments and gave helpful instructions and advice in each stage of the project.

### Constraints and problems incurred:

There have been no constraints in carrying out this action.

### Complementary action outside LIFE

There have been no complementary actions outside of this project for this action.

### Perspective of action continuity

While the EEB always monitors and evaluates its activities, and will continue to do so, there is no action continuity after the project end.

#### **C.4. After LIFE Plan**

Foreseen start date:	Q3 2019	Actual start date:	Q2 2019
Foreseen end date:	Q4 2019	Actual end date:	July 2020

##### Description of activities conducted and resulting outputs

As part of this final report, the After-LIFE Plan (Annex C.4.1) describes the EEB's plan to continue work to work on the issue of enhancing implementation after the ending of this project, including how we anticipate to financing this.

The development of the LTS (Action C2) has helped tailor an After-LIFE Plan for this project, so that it is framed within the long term vision for the EEB's work.

##### Planned output and timeline, deviations and impacts on other actions:

The development of the LTS among EEB staff and members in 2019 took place as planned, as did the exploration of funding opportunities to continue to build on and deepen the work that was initiated during the Implement for LIFE project. The growth of the organisation, which was addressed at the organisational training (Action C2) also had to be taken into account. All these elements helped shape the After-LIFE plan, which was finalised during the extension period of the project, as agreed in the Amendment of the Grant Agreement.

##### Constraints and problems incurred

No constraints or problems were incurred in this action, except for the need to conclude this action during the 3-month extension of the project. This was approved in the Grant Amendment.

##### Complementary action outside LIFE

In general, the After-LIFE Plan has been developed taking into account the strategic opportunities within the EEB's overall work plan and Long Term Strategy. Other than that, there have been no other direct complementary actions to the After-LIFE Plan.

##### Perspective of action continuity

Other than the content in the After-LIFE Plan, there is no perspective of continuity for this specific action.

## 6.2. Main deviations, problems and corrective actions implemented

### **Action A1**

The delay in the project launch did not cause problems overall. In fact, four Law Working Groups were planned to take place, whereas five actually occurred. Because three out of five Working Groups were meetings held in-person, whereas four in-person Working Groups were budgeted for under this project, there was underspending for this action despite there being one additional meeting.

The first Working Group was held online in June 2018, whereas the subsequent three were physical meetings held in Brussels. The fifth Working Group was planned to take place in the EEB's premises in Brussels in March 2020, but due to the COVID-19 pandemic, this meeting was reduced to a two-hour online meeting.

It was hoped that a final live training for the Law Group members could take place before the end of the project (under Action C2), but this was still not feasible despite the approved 3-month extension of the project given the unchanged COVID restrictions. An online Working Group is planned to take place for mid-December 2020 (date tbc) where online tools are being explored for a reduced organisational development exercise with the members.

The original scope of this action, which was the development and revival of the Law Group, was fully met and was also extended with enhanced collaboration with NGOs and civil society more widely. Therefore, overall, this action was successful and fully achieved. See further under Section 6.3.

### **Action A2**

Delay in the project launch led to the delay in the publication of the first report. The initial time it would take to collect information and get the relevant people involved in the project was also delayed by the fact that new staff had to be hired at the beginning of the project. A detailed 72-page background document was developed during the first 8 months of the project, which then proved useful to design and structure the series of compliance reports that were published under this action. The timeline for the publication of the four compliance reports was adapted so that there would be a five-month interval instead of six. All four compliance reports were published in the adapted timeline. Given the sudden changes to working conditions in March 2020, the summary report was published in July 2020 after the extension of project was granted.

The project proposal did not provide specific details on the content of the compliance reports, other than the need to cover issues in five areas (with an additional two) and that they should cover issues in as many Member States as possible to include a wide reach and have a comparative scope. Thanks to the background document, and after consultation with the EEB Law Group, it became clear that there were common implementation issues across environmental themes and that the compliance reports would therefore focus on those commonalities, to serve the interest of all the environmental themes that are covered by the project. This proved to be necessary also in light of the environmental themes that were added to the scope of the project in late 2018, namely chemicals and industrial emissions. Because of the breadth of the environmental themes and the need to cover experienced from across the EU's Member States, it only seemed logical that each report would explore implementation issues that are common to all areas and to all Member States. The focus on the three Aarhus pillars (access to information, public participation and access to justice) were particularly fitting in that regard. The choice was made to start with access to justice as a lot of information was already collected in the background document. And it related to the experience of most of the EEB members. The fourth report explored compliance and enforcement as another measure to assess implementation of EU environmental laws in the Member States.

The additional factsheets on the transposition of waste laws were a deviation from the planned activities under this action, and this was possible thanks to the co-funding of a MAVA project and did not require any mitigating measure. Also, the research and drafting of the report on the compliance of Member States with CJEU rulings on biodiversity was also possible thanks to another MAVA-funded project.

So, this action was fully and successfully implemented, including one additional report and three additional fact sheets.

### **Action A3**

This action was initially delayed due to the late start of the project. It became apparent that the publication of a report before the European Parliament elections that would have the effect of being picked up by the incoming commission in 2019 would not be achievable. Therefore, while the deliverable of this action was the publication of just one report, the desired outcome (that the incoming Commission could incorporate our demands on integration and rule of law) had to guide the activities under this action, resulting in the publication of two reports and supporting the publication of a third.

The development of an 8<sup>th</sup> Environment Action Programme was a clear point of influence, where the Implement for LIFE project could help with drawing up a civil society vision of what an 8EAP should look like to promote environmental integration and strengthen the rule of law. However, the changing political landscape after the European Parliament elections, with the so-called ‘green wave’ that resulted, meant that we also had to time our actions to moments where we would have greatest opportunity to influence. The civil society vision was therefore adapted to respond to the incoming Commission’s announcement that a European Green Deal communication would be developed before the 8<sup>th</sup>EAP. As a result, the report ‘*Priorities for the European Green Deal and 8th Environmental Action Programme*’ was published in November 2019. This report conveyed the message of the importance of implementation and enforcement of the environmental laws, as well as the need for horizontal enabling policies, thus it fully supported the A3 action of Implement for LIFE.

Because the Better Regulation/Reprotection project with the New Economics Foundation – which co-financed this project – also broadly explored issues of environmental integration and policy coherence ahead of the European Parliament elections, the report ‘*Reprotecting Europe: The EU Green Deal v The War on Regulations*’ (published in January 2020) complemented the first report (*Priorities for the European Green Deal and 8th Environmental Action Programme*) as it went in greater depth on Better Regulation and the effect that has on environmental integration and the rule of law. Therefore, this report is considered an additional deliverable for Implement for LIFE.

A third report, a research study carried out by Justice & Environment, also supported the activities under this action. The report ‘*The harassment of environmental defenders in the EU – a case study report*’ illustrates the instances of harassment and intimidation that environmental activists faced in a short period of time in different Member States. This report is an important study to illustrate the often unspoken of intolerance and hostility towards environmental defenders in Europe and the need to protect civil society space: a fundamental condition for a pluralistic democratic society which respects the rule of law. EEB supported this report by writing a foreword, publishing it in our EEB library and distributing it via our usual media channels. The report itself supports the Implement for LIFE project’s message.

While this action evolved over time to adapt to the political reality and the need to react strategically to maximise its desired impact, we delivered more than the foreseen deliverables and were able to have successful outcomes (see section 6.3).

### **Action B1**



Delay in the scheduled release of the reports caused the first report to be published in November 2018 instead of June 2018, also delaying the B1 action. The organisation for the publication for the next issues were moved forward accordingly.

The last report published under the project (the synthesis report) was released in July 2020. Due to the publishing date of the report, end July, the Communications Officer decided to postpone the communications actions surrounding it. Our members and most of the EU bubble were already on holidays at this moment, therefore we decided not to distribute the report to our list of journalists. However, in autumn 2020, we sent the report to our membership and to publish and share a META article summarizing the project. The article was then shared through our newsletter of September.

### **Action B2**

Contrary to the proposal, the Communications Officer in agreement with the Communications Manager decided to send the reports to a smaller number of journalists than foreseen in the proposal and to publish additional META articles about the reports. Despite the smaller number of journalists contacted via our mailing lists it should be noted that journalists are also subscribed to our newsletter where the reports were featured.

The project did not foresee a budget for the 17 translations of the toolkits, because the members did not express interest in these translations, the Communications Officer decided to focus on English communication material.

### **Action B4**

The release of articles, videos and podcasts was less regular than anticipated. We timed the release according to the news and the exchange we got with members. Also, because of the Covid-19 restrictions, the podcast timeline got delayed and instead of making the 10 podcast initially envisaged we only published 7 of them and shifted to more videos that were easier to organise as we didn't have to meet in person to create them.

### **Action B5**

The social media reach foreseen in the proposal were ambitious and not all the targets were met under the action B5. First, the newsletter did not reach a 25% opening rate, this can be explained by the fact that the newsletter format was restructured shortly before the project started and the audience was still in a growing phase. At the end of the project two mailing lists were merged, which explained the lower results obtained in the last two months of the newsletter. Second, the twitter posts did not meet the expected results each month, but did reach the targets in December 2018, March 2019, April 2019, July 2019, October 2019, November 2019 and April 2020. The EEB went into a strategy building process for its social media accounts and this was very beneficial for the organisation. One of the decisions that emerged was to tweet less frequently but in a way that would increase the engagement per post.

### **Action B7**

The Implement for Life page did not attract as many readers as expected but the traffic was directed to the META content. Most traffic was directed to the actual products we did during the project: reports, videos, articles, our social media posts. The figures are recorded under KPIs 11 in section 7 below.

### **Action B9**

Because the report was finished in July 2020, we decided to share it in the autumn as there would be more interest in it after the summer season when many staff and members were on vacation. However, we did release a video at the same time the report was published which

we could share more widely and put on our social media. We then only distributed the report via our usual channels in autumn 2020.

### **Action C1**

With relation to the project management, additional staff was involved in the project compared to what was originally foreseen. Some staff were replaced by incoming new staff who needed to be familiarised with the project (see staff list in Annex C.1.1.1). This did not pose any major problem for the project, but it did highlight some of the organisational needs for future work. This was addressed during the training under Action C2.

### **Action C2**

The main deviation in this action from what was originally intended in the proposal, was the integration of the training under this project with the wider exercise of the EEB to develop its Long Term Strategy. With the development of the LTS, the EEB put implementation and enforcement at the heart of its advocacy work as a cross cutting topic, which was not the case explicitly before the Implement for LIFE project. Effectively, the project framework and objectives were turned into a horizontal programme within EEB, so that the project's sustainability is enhanced and the chances for its continuation are high. This was therefore a very welcomed and logical deviation which will ultimately lead to mutual benefits: both in relation to the implementation of the LTS, as well as organisational well-being while enhancing the effectiveness of policy advocacy.

The COVID-19 pandemic meant that the organisational training with EEB staff that had been planned for April 2020 could only take place in July 2020. As a result, the follow-up training with the Law working group also had to shift in time, but it did not take place within the project duration, despite the extension. This is because the project end was during the summer which, on top of the special circumstances of the pandemic, meant that a low participation of members in July would not have resulted in an effective training. Therefore, thanks to the extension of the project by three months, 22 EEB staff were able to take part in a workshop in July which has already led to concrete actions and improvements in integrating horizontal policy actions in the different policy focus areas. A strategy workshop, taking into account some of the lessons learned from the staff training, will be held online for the Law Group members in mid-December 2020.

### **Action C3**

There were no particular difficulties or issues with the project monitoring. Whenever there were questions about procedure and timeline, the monitor for this project was always very available to clarify the reporting requirements. The monitor was particularly helpful during the first monitoring visit in October 2018 to guide the project coordinator who had just been hired to manage the project so that actions could be completed successfully, despite the late start of the project, and to do the Progress Report in time. The monitor was always very responsive with clear and helpful communication whenever there were issues, especially when there were uncertainties around the KPI values that needed to be inserted in the webtool and the request for project extension.

### **Action C4**

The deviation under this project action was the timing of the final After-LIFE plan, which could only be completed with the completion of the major deliverables and outputs of the project. The approved extension of the project by three months ensured that this was successfully addressed.

### 6.3.Evaluation of Project Implementation

#### **Methodology and replication efforts:**

The structure to implement the project actions was based on the existing membership structures within the EEB, the working groups. The revival of the Law working group was intended to be the main working group through which this project would be implemented. Information was distributed primarily through the Law Group members, but also a significant amount of information was gathered through it. The project coordinator, (Legal Officer), is the EEB staff responsible for convening the members in the Law Group.

As part of the EEB's EU Policy Team, the project coordinator, (Legal Officer), informed and coordinated some relevant actions with other policy staff. Similarly, the Communication Officer informed and coordinates with other staff in the Communications Team about the dissemination actions that were relevant to other communication efforts.

The dedicated Legal Officer and the Communication Officer had weekly meetings monitoring the implementation of the project and managing the day-to-day tasks.

This set up was largely successful, in particular the close collaboration between the project coordinator and the Communication Officer. The distribution of project material from members was at times more challenging as their interest in the project topic did not necessarily always translate in a commitment to disseminate the information. Most EEB members work on specific issues at national level that will likely be linked to the EIR and broader horizontal implementation issues. So even though there was interest in the project and we were able to receive a lot of valuable information from them, this was not always sufficient to make them commit to planning their work and communication strategy in a way which would have optimised the project's outreach. The involvement of the EU Policy Team and wider Communication Team sometimes helped to overcome these difficulties. The Organisational Development training (Action C2) was organised partly as a response to the need for more strategic collective action and to help with prioritisation. Future work to improve implementation would benefit from an identification of a core group of members who consistently take on the responsibility to contribute and advise on specific issues, based on a wider consensus within the working groups of specific priorities. This could be done, for instance, by enhancing a more regular engagement with the other working groups on their specific topics based on common priorities. Dedicated funding for translation may also have facilitated the members with their efforts to disseminate material and replicate some actions.

Action	Foreseen in the revised proposal	Achieved	Evaluation
A1	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- revival of the EEB Law Group and increase engagement on horizontal issues affecting implementation.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- By mid-2018 an active group of approximately 10-15 people has been formed with a further 10-15 people taking a more passive role, meeting twice per year</li> </ul>	Fully	The results for this action were immediately visible with the participation of members in the 5 Law Working Groups that were organised during the project. The regularity with which some Members (10-15 people) partake in the meetings and interact in the mailing list of the network, as well as their involvement in the development of the Long Term Strategy, demonstrates that the objective of creating this network was met. The possibility to give some members ownership of the content

			discussed ensures that they are committed to the group.
A2	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- action taken to address cases of non-compliance highlighted in the reports.</li> <li>- a deterrent effect to other future possible cases of non-compliance/poor implementation</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Publication of 5 reports (4 plus a summary report)</li> <li>- increased focus in national media and debate on national governments' role in implementing and enforcing EU environmental rules</li> <li>- increase already high level of support among citizens for EU action to protect the environment.</li> <li>- Broad recognition among policy makers of key enabling factors for successful implementation.</li> </ul>	Mostly	The publication and uptake of the reports in national media could be measured immediately. However, because the reports are intended to continue to be distributed also in the future, the total uptake is difficult to quantify at project end. The project extension ensured that a summary report could be delivered, which will also prove useful to highlight the main recommendations of the compliance reports. Yet, the broad recognition of key enabling factors for successful implementation by policy makers is already felt (see below under Policy Impact). Therefore, it is expected that the objective will be reached if all cases of non-compliance are to be addressed. While all policy developments and legislative developments take their time, reports that are more focused in their scope are easier to communicate about and therefore may have an impact that is easier to monitor and objectives that are quicker to reach.
A3	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- New European Commission coming into office after 2019 EP elections includes our proposals in the political priorities and work programme</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- 1 report to be presented at a public event in early 2019</li> </ul>	Fully	The project overdelivered in this action with the publication of the two reports, an immediately measurable result. Both reports were accompanied by public events <a href="https://eeb.org/european-green-deal-and-the-8eap/">https://eeb.org/european-green-deal-and-the-8eap/</a> (see also Annexes A.3.6.) The incoming European Commission was receptive to meeting with the EEB early on (see key meetings in Annex A.1.16) and included issues of integration and enforcement and implementation in the European Green Deal. Access to justice in the Member States was also mentioned. Moreover, the 8 <sup>th</sup> EAP announced on 14 October 2020 mirrors many of the ideas and concepts included in one of our reports under this action. For these

			reasons, the objective is considered fully met.
B1	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Government or local authorities engage in environmental work to close implementation gap.</li> <li>- NGO member state advocacy using innovative examples from other EU countries.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Reports distributed to 2,500 environmental NGO leaders, staff, members and supporters across the EU.</li> <li>- Increased knowledge amongst national level NGOs of the EIR process and how their issues relate to the process.</li> <li>- Better knowledge amongst national level NGOs of innovative approaches to solving the problems of environmental regulation implementation gaps around the EU.</li> <li>- Enriched public dialogue around the EU in relation to how to solve environmental problems.</li> </ul>	Fully	<p>Closing the implementation gap is a long process. We believe that the reports shed light on structural issues that are detrimental for NGOs and for authorities. The results and recommendations contained in the reports are a support for these authorities.</p> <p>NGO members reached out to the EEB with cases and these were discussed in the Law Working Group and included in the reports. The exchange of experience allowed for NGOs to compare country situation and to take examples on other countries.</p> <p>The four compliance reports were distributed to 2,500 environmental NGO leaders, staff, members and supporters across the EU. Their publication added to the Law Working Group work helped us discussed crucial implementation issues with NGOs victim of this implementation injustice. We brought the EIR discussion at the heart of the Law Working Group and thanks to the many meetings and networking we believe that we enriched the public dialogue around these questions.</p> <p>With the Grant Agreement amendment, the publication of the summary report was in July, therefore it was not distributed in the same way as the others given that it was a month with low activity. Communication actions around this report were therefore delayed to September.</p>
B2	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Increasing media engagement for each report</li> </ul>	Mostly	<p>The media engagement around each report increased with each publication, reaching its maximum with the last report. The video released alongside the reports helped</p>

	<ul style="list-style-type: none"> <li>- Increasing social media engagement with the online materials</li> <li>- Spin off media as others engage in the issues.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Media hits in 15 media markets across the EU in relation to environmental regulation implementation issues for every report release.</li> <li>- Press releases and reports distributed to 1,400 national level journalists across all EU Member States.</li> <li>- A better understanding of the work of the EU in upholding citizens' fundamental right to a clean environment amongst the public and NGO community.</li> </ul>		<p>us get more engagement and reach out to a broader audience.</p> <p>The reports were featured in fewer media markets than foreseen. Engaging the membership and involving the press in the topic revealed to be more difficult than expected, despite our large audience. Reflection on this included under paragraph below under "Effectiveness of the dissemination activities".</p>
B3	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Increasing unique visitors month on month for the webpage/content.</li> <li>- 160,000 unique visitors reached within the lifetime of the project.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- A dedicated page within the Meta online news site.</li> <li>- The content/webpage reaches 5,000 unique visitors per months in the first six months. (this was not achieved, see below in section 7 on KPIs)</li> </ul>	Partly	<p>The EIR page on the META online news website was launched in June 2018 and remains online indefinitely, and at least until five years after project implementation, as per the Grant Agreement. It is a page where all the articles written under the Implement for LIFE project are listed. The page in itself didn't attract many visitors but the articles did reach a very broad audience (see Annex B.4.1).</p>
B4	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Increasing numbers of unique visitors to the content month on month.</li> <li>- Use of our content by Member State NGOs in their advocacy work.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Content posted on the Meta website and project webpage once a week for 20 weeks of the year.</li> </ul>	Mostly	<p>We combined the first two 'expected results' to '25 articles will be published on META each year'.</p> <p>The content produced attracted a broad audience (Annex B.4.1 and B.4.2) and depending on the subject the articles got more or less views (Annex B.4.1). One thing to note is that articles depicting positive</p>

	<ul style="list-style-type: none"> <li>- Blog posts appearing three times a month for 10 months of the year.</li> <li>- Video posts bimonthly (every second month) for 10 months of the year.</li> <li>- Podcasts bimonthly (every second month) for 10 months of the year.</li> <li>- Better understanding of the EIR process and regulation gaps amongst the public and NGO community.</li> </ul>		<p>examples attracted usually more readers than others.</p> <p>The frequency of publication was not always met. The publications were rather timed on news, current events and heads-up from members.</p> <p>In total, 57 articles were published on the META website, as well as 17 videos and 7 podcasts. The request for amendment was made at the end of the project in order to reach the targets for the publication of videos and podcasts which had been compromised by the abrupt change in working conditions.</p>
B5	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Growing open rate on weekly campaigns month on month.</li> <li>- Growing twitter impressions month on month.</li> <li>- Growing Facebook reach month on month.</li> <li>- Use of content by NGOs in their advocacy on environmental regulation implementation.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Increased knowledge of environmental regulation implementation gaps as well as innovative solutions to address them among the NGO community.</li> <li>- An open rate of 25% on the weekly email campaign.</li> <li>- In excess of 30k monthly twitter impressions on content from the project.</li> <li>- Facebook reach on average of more than 1K per share.</li> </ul>	Fully	<p>The newsletter open rates grew during the project. They remained steady at the beginning of the project, at around 20% opening and reached up to 30% opening at the end. The months of June and July 2020 show a decline in opens and clicks on the newsletter. This is due to the merge of the META list with ‘the Switch list’ (another newsletter run by the Global Policy Unit of the EEB).</p> <p>The twitter impressions for each post grew during the project, thanks to the implementation of a new social media strategy developed by the EEB. There were fewer posts, but they gathered more impressions each (Annex B.5.3). The target set in the grant was reached seven months over the course of the project.</p> <p>The Facebook statistics show to be quite steady. Facebook is the channel that grew the list for the EEB in the last two years and a strategy is still to be implemented for this social medium which will hopefully bring more engagement. On average the target set for Facebook was reached (Annex B.5.1).</p>
B6	<i>Objectives:</i>	Fully	The roll ups were seen by members of all EEB working groups organised in

	<p>- Increased questions and interest in the project at the events at which they appear.</p> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Signs seen by members of all EEB working groups over the lifetime of the project.</li> <li>- Appeared at 4 EEB conferences.</li> </ul>		<p>the EEB office. One of the roll-ups was displayed in the entrance of the EEB office and the other one in one of our meeting rooms, therefore any visitors saw the roll-up.</p> <p>The roll-ups were displayed during EEB events (including its annual conference in Berlin 2019).</p>
B7	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Increasing traffic to the webpage month on month.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Increased knowledge of the elements of the project amongst the public and the wider NGO community.</li> </ul>	Partially	<p>The page described the project and we directed anyone interested in our work to consult that page. The traffic on this page did not show real progression as the content developed during the project: reports, letters, articles, podcasts, videos etc have their own pages and so it was not necessary to go to the project page to find them.</p> <p>However, the deliverables were also uploaded on the META website through the dedicated news channel. Because META includes all our news, it attracts more traffic than a specific project page, so helped increase the views on the articles and other communication material under the project. Some project articles also featured on other META news channels when they related to another specific topic, thereby increased the chances of attracting new audiences who may not follow implementation issues.</p>
B8	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Better implementation of communication actions.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Being part of cutting-edge discussions on implementation challenges and solutions</li> <li>- Develop a number of key lessons that can help improve the impact of our project.</li> </ul>	Fully	<p>The action B8 was more beneficial to the policy content of the project than to expanding the reach of the communication actions. However, it did positively impact on the quality of the reports and therefore may have, in that sense, helped with the outreach. The EEB was invited to a lot of events to discuss the project (see Annex A.1.16) and was able to network and share knowledge with other like-minded NGOs</p> <p>An internal document with considerations on some lessons learned on the communication</p>



			actions was developed (Annex B.8.1).
B9	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Positive feedback from members relating to advocacy on environmental regulation implementation gaps.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Distributed digitally to 2,500 NGO leaders, staff, members and supporters.</li> </ul>	Fully	<p>The layperson's report was shared with our membership and audience in autumn as it was finalised during the project extension after the amendment to the Grant Agreement.</p> <p>The project received a lot of positive feedback from other NGOs working on the field. We shared our work with our audience to keep them aware of EEB's experience and members' experience. Subject to the amendment of the Grant Agreement, the layperson's report was distributed with our audience on social media through a video in June and was then distributed to our membership in autumn via our Law mailing lists. The newsletter featuring the article about the report was sent to 8,345 subscribers.</p>
C1	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- recruitment and retention of a highly qualified project manager, successful integration into the EEB's team and broader work</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- Project deliverables coming out as planned with minimal delays</li> </ul>	Fully	<p>All project deliverables came out with minimal delays and within the project duration. The project manager was recruited in September 2018 with the position of Legal Officer and has been successfully integrated in the EU Policy team and the EEB as a whole.</p>
C2	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- Members and staff able to effectively provide input and participate into EIR process and identify opportunities to improve implementation of legislation in their area of work.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- 2 trainings organised for staff. All EEB working groups for the prioritised themes will have had sessions on the EIR, their input sought and their members briefed on how to engage.</li> </ul>	Mostly	<p>Trainings on the Long Term Strategy development process were organised in 2019, preceding the Organisational development training in 2020. The LTS involved both EEB staff and EEB members through the working groups and the board, whereas the organisation training was conducted only with staff for the time being, due to travel restrictions during the pandemic. The organisational training was only possible after the amendment to the Grant Agreement. Members and staff have been able to provide their input and share expert knowledge during the project, identifying common priorities and</p>

			processes during the LTS, which has opened up opportunities for deeper integration of efforts to improve implementation of legislation in different work areas, mainstreaming implementation and enforcement throughout EEBs 20 working groups.
C3	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- delivery of the reports</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- clear, concise and relevant information on the project implementation provided in the project reporting.</li> </ul>	Fully	The project reports have been submitted as planned, with a revised deadline for the Final Report to reflect the actual end date of the project.
C4	<p><i>Objectives:</i></p> <ul style="list-style-type: none"> <li>- continuation of the newly assembled network of NGOs beyond the duration of this project and its engagement in the EIR process.</li> </ul> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> <li>- continuity of actions after project end.</li> </ul>	Fully	With the established EEB Law Working Group, (as well as with a more active and updated ECO Forum network of NGOs involved in Aarhus Convention issues), there is now a collective interest and ownership of the discussions and advocacy actions that will last beyond the duration of the project.

### **Effectiveness of the dissemination activities:**

The EEB's focus on implementation issues has coincided with a growth of the EEB audience overall. Indeed, even the EEB membership grew during the project period, now gathering 161 members across the European continent. In particular, there has been a marked increase in newsletter subscriptions and the EEB has increased its audience on social media.

As explained above and in Section 6.2. the compliance reports and uptake of national media was not as easy as originally envisaged. The broad description of the action, with the publication of four reports that needed to address seven different environmental areas as well as draw on examples from several Member States, meant that it was challenging to address all these elements and also hook national media to implementation issues. The solution to focus on four broader governance aspects that affect the role of NGOs in implementation, not only made sense from a policy point of view, but allowed each report to explore a dedicated concept, while also complying with the specific project requirement. The horizontal nature of the project, which made it relevant to every Member State, may not have attracted enough media attention at national level because it was not designed to single out any particular issue or practice. The experiences in the Member States that were collected in the reports informed the overarching messages, yet broad implementation and governance issues were difficult to communicate to citizens. The attention of national media outlets could maybe also have benefited from translation, had there been additional resources for this for the EEB or its members.

### **Policy Impact:**

The policy impacts of this project were visible more prominently in the latter half and at the end of the project. Indeed, some policy impacts will be seen in the next year or beyond. However, there are some specific impacts that have led to both changes in legislation as well as to policy developments:

#### *The impacts experienced during the project:*

- The EEB was in close contact with Arnaud Schwartz, the rapporteur of three EESC NAT committee opinions and reports, thereby influenced their outcomes: The [EESC NAT/744 exploratory opinion](#) on Implementation of EU environmental legislation in the areas of air quality, water and waste. This was highlighted some of the issues that we had already started documenting in our background document under Action A2 (see Annex A.2.1). We also contributed to the development of the [NAT/759 exploratory opinion](#) on a more constructive role for civil society in implementing environmental law, highlighting in particular the issues that were covered in the project's first two compliance reports on access to justice and public participation. Lastly, through the project we were able to advise the EESC NAT committee during their fact-finding missions in five Member States for their evaluation of the Environmental Crimes Directive. In this instance, we were able to put the EESC in direct contact with EEB members in these countries. The outcome of this evaluation is presented in the [NAT/767 information report](#) on the Evaluation on the Environmental Crime Directive.
- The evolution of the European Semester with the Country Specific Reports and with more environmental considerations integrated has been pushed for by the EEB under this project. The need [to integrate SDGs](#) and monitoring their implementation at national level, good governance and implementation of environmental laws in the European Semester are key advocacy points promoted under the Implement for LIFE project.
- Arguably, the meetings, events and materials produced under this project and that were disseminated to and exposed to officials in the EU institutions, may have positively influenced some of the content in the Commission Communication on the European Green Deal. In particular, the need for greater emphasis on implementation and enforcement of environmental law and policy.

#### *Current impacts:*

- The [Commission proposal to amend the Aarhus Regulation](#) and the [Communication on Access to Justice in the Member States](#) of 14 October 2020: the EEB has been involved in all the [stakeholder meetings](#) organised by the Commission and its consultants on the revision of the Aarhus Convention, and also participated in the stakeholder workshops on Governance Assurance and Compliance. We have been able to inform the Commission about our position on access to justice in environmental matters on a regular basis and our opinions have been taken into [consideration](#), albeit not fully, in the outcome.
- The proposal for the 8thEAP which came out on 14 October 2020: the priority objectives identified by the Commission reflect the ones contained in the report “*Priorities for the European Green Deal and 8th Environmental Action Programme*” which was published under Action A3 of this project. See further under section 6.4 Analysis of benefits.

#### *Expected future impacts:*

- Future work on access to information at the EU level as well as at the [UNECE](#) is expected to take into account ways of integrating environmental information and expand on product information, issues that were raised in the compliance report '*For Your Information*'. A consultation on the ePRTR is now underway in the EU and the Aarhus MOP in 2021 should agree on the updated recommendations on Electronic Information Tools that we contributed to under this project. (See the After LIFE plan, annex C.4.1).

## 6.4. Analysis of benefits

### 1. Environmental benefits

This project did not foresee to measure quantitative and qualitative environmental benefits, although they should be felt in the long run. This project had the aim of improving the implementation of the rules that protect the environment and to propose measures to strengthen them. For this reason, benefits cannot be measured for this project, although the intention is that they will be felt indirectly in the long term.

### 2. Economic and social benefits

Similarly, this project did not foresee to measure the economic or social impacts, although the indirect benefits of improving and strengthening the implementation of environmental rules will benefit society as a whole, [collective well-being and the economic viability and sustainability of businesses](#). Two additional full-time qualified staff were employed at the EEB for this project and two other temporary staff were also employed for the duration of 7 months to support the advocacy actions.

### 3. Replicability, transferability, cooperation:

This project does not relate to any technical or commercial application, nor to any conservation methodology which can in the technical sense be replicated or transferred. However, the outcomes and lessons learned will shape how the EEB continues to advocate for better implementation of environmental rules. The network of NGOs and experts in the Law Working Group will remain so that cooperation between members and partners will continue.

### 4. Best Practice lessons:

The dissemination actions that were most targeted were those that were closely planned in coordination with individual members in advance (see Section 6.3 above and annex B.8.1). When the stories brought to us by the members were at the centrepiece, there was more chance of enhanced dissemination of the article, video or podcast to audiences at member state level as it helped members take ownership of the content of the publication. On the other hand, those stories that related to more high-level and horizontal issues, typically involving processes at EU or Aarhus level, received more attention from the members themselves and the traditional audience of the EEB, which normally follows EU affairs more closely (ref. KPI 1.6). In the long run, communication on high-level and horizontal matters can be more easily linked to other environmental topics, including specific issues in the member states. The lesson learned from this is that there need to be different formats and levels of engagement when communicating on implementation issues, depending also on the audience that should be reached.

### 5. Innovation and demonstration value:

As this project did not involve any test-case or prototype, there is no clear innovation or demonstration value to it. It could be said that there is, however, some level of innovation for the EEB, in the creation of the Law Working Group and structuring its work on implementation.

#### 6. Policy implications:

The project was designed to have lasting and systemic impact on environmental policy, namely, to increase NGO engagement in the Environmental Implementation Review and other actions to enhance better implementation and enforcement of environmental laws.

The EEB has been present and engaged at a high level with the Commission during the ['Greening the European Semester' expert group](#), that take place twice per year with experts from the Member States. Similarly, the EEB has participated and presented at committee meetings in the EESC on the European Semester (see list of events in annex A.1.16). The project looked in implementation gaps in different areas, and analysed the commonalities between these in the compliance reports (Action A2). These reports highlighted the crucial role of robust environmental governance for proper environmental implementation. The EEB also actively participated in stakeholder meetings under the [Environmental Governance and Compliance Assurance](#), which allowed for networking with environment agencies and inspectorates (IMPEL). In the stakeholder meeting of 30 November 2018 the Commission referred to the EEB's poster for civil society engagement (Annex C.3.1). The second cycle of the EIR country reports took into consideration the governance aspects of environmental implementation more prominently than in the first cycle, including issues of access to information, public participation and access to justice. The [Commission's proposal for an 8<sup>th</sup> Environment Action Programme](#) seems to squarely address some of the key elements in the report "*Priorities for the European Green Deal and 8th Environmental Action Programme*" (Annex A.3.1.), with the inclusion of enabling objectives (Article 3) that refer to strengthening implementation and compliance, and "effectively applying high standards for transparency, public participation and access to justice", among other things.

Moreover, the work that the EEB has done on securing civil society space together with a [wide network](#) of NGOs, journalists and academics on SLAPPs, has sparked a [reaction](#) from Dunja Mijatović, Commissioner for Human Rights of the Council of Europe.

## 7. Key Project-level Indicators

The following values are the updated and approved ones that were completed just before the end of the project in July 2020. They have been extracted from the KPI webtool.

### **KPI 1.5 – project area/length**

Unit: m2

At the beginning: 0

At the end: 1

*Comment: this indicator is not relevant for this project.*

### **KPI 1.6 – humans to be influenced by the project**

Persons who changed their behaviour or practices due to the project actions. Unit: Number of non-resident persons regularly present within or near the project area (e.g. employees).

At the beginning: 0

At the end: 30

Beyond 3 years: 50

*Comment: the people in this category refer to those in civil society organisations. After 3 years, it is expected that more people will be influenced by the project through the Law Working Group through its activities and projects.*

Persons with improved capacity or knowledge due to project actions. Unit: Number of non-resident persons regularly present within or near the project area (e.g. employees).

At the beginning: 0

At the end: 50

Beyond 3 years: 100

*Comment: this figure refers to policy officials in EU institutions. These are not only those directly involved in the EIR, but also those in other units but who were informed of this project. These will mostly be those in DG Environment, as well as a few in DG Justice, although also include officials in the Council, the EESC and MEPs. Even with the uncertainty of the COVID pandemic, it is likely that beyond 3 years 1000 persons will have improved capacity.*

Persons who may have been influenced via dissemination or awareness raising project-actions. Unit: Number of other persons influenced /impacted independently of the project area.

At the beginning: 120

At the end: 3000

Beyond 3 years :5000

*Comment: there was no precise tool to calculate every single person who became aware of the project through the awareness raising actions. However, we expect that 3000 persons were influenced at the end of the project based on a combination of factors: the number of downloads of the project reports as well as readers on the META articles.*

#### **KPI 10.1.2 – supervisory/enforcement bodies involved**

National authorities. Unit: Number of supervisory / enforcement bodies involved

At the beginning: 0

At the end: 10

Beyond 3 years: 22

*Comment: through the events and workshops attended, there have been ample opportunities to engage with national authorities and this target has been reached.*

Inspectorates/Agencies. Unit: Number of supervisory / enforcement bodies involved

At the beginning: 0

At the end: 7

Beyond 3 years: 10

*Comment: through the events and workshops attended, there have been some opportunities to engage with national agencies and this target has been reached.*

#### **KPI 10.2 – involvement of NGOs and other stakeholders**

Other civil society organisations. Unit: number of stakeholders involved due to the project

At the beginning: 0

At the end: 84

Beyond 3 years: 94

*Comment: this number includes the same as the value below as well as other civil society organisations in the UNECE ECO Forum and those that were involved in the project through the A3 actions. This target has been reached.*

NGOs. Unit: number of stakeholders involved due to the project

At the beginning: 3

At the end: 64

Beyond 3 years: 70

*Comment: through the involvement of the EEB members in the Law Working Group in meetings and regular email exchange, as well as with some engagement through other EEB working groups, this target has been reached.*

Individuals. Unit: number of individuals

At the beginning: 0

At the end: 40

Beyond 3 years: 50

*Comment: These are the individuals that are more closely involved in the project, belonging to either the EEB membership or have been involved through the ECO Forum or are part of a wider civil society stakeholder. Individuals in this category are nearly all part of one of the two above, with the exception of only a couple of independent legal experts. This target has been reached.*

### **KPI 11.1 – Website**

Number of individuals. Unit: number

At the beginning: 0

At the end: 200

Beyond 3 years: 300

*Comment: this target was closely reached, with 154 individuals, however we also had separate views on the press releases, therefore adding those figures we have reached the target. See google analytics in annex B.7.1.*

Average visit duration (minutes). Unit: number

At the beginning: 0

At the end: 2

Beyond 3 years: 2

*Comment: this target has been reached.*

No. of unique visits. Unit: number

At the beginning: 0

At the end: 200

Beyond 3 years: 300

*Comment: this target was closely reached with 130 unique visits, calculated through google analytics. See again annex B.7.1.*

No. of downloads. Unit: number

At the beginning: 0

At the end: 1500

Beyond 3 years: 4000

*Comment: The number of downloads is higher than the number of visits on the project page because all the reports are in the EEB library and are cross-referenced in other EEB web pages and on social media. We have no reason to believe that the actual number is any different at the end of the project than what we foresaw. However, the EEB library plugin changed in March 2020 and since then the figures have re-set. See further explanation in section 6.2 under action B1.*

## **KPI 11.2 – other tools for reaching/raising awareness of the general public**

Print media. Unit: number

At the beginning: 0

At the end: 0

Beyond 3 years: 0

*Comment: printed material was not foreseen in this project. We do not foresee to print any in the next 3 years, reports will be published electronically.*

Publications/reports. Unit: number

At the beginning: 0

At the end: 400

Beyond 3 years: 600

*Comment: this number refers to META articles and the target has been reached, see annex B.4.1.*

Other media (video/broadcast). Unit: number

At the beginning: 0

At the end: 6000

Beyond 3 years: 8000

*Comment: this is based on social media, see Annex B.4.2.*

Events/exhibitions. Unit: number

At the beginning: 0

At the end: 200

Beyond 3 years: 350

*Comment: this relates to people who have participated at EEB events where this project has been presented or at least its recommendations been referred to. This target has been reached and considering that the recommendations and finding will continue to be relevant 350 people are expected to have been reached.*

Displayed information (poster, information boards). Unit: number

At the beginning: 0

At the end: 325

Beyond 3 years: 600

*Comment: this relates to people who have seen the roll-ups for the project. This target has been reached. The roll-ups will continue to be displayed at EEB events therefore beyond 3 years 600 people will have seen them.*

Hotline/information centre. Unit: number

At the beginning: 0

At the end: 100

Beyond 3 years: 200

*Comment: there was no dedicated hotline for this project, but the contact details of the project coordinator, Francesca Carlsson, were indicated on the webpage. The figure after 2 years is a conservative estimate.*

## **KPI 12.1 - Networking**

Professionals. Unit: number of individuals



At the beginning: 0

At the end: 30

Beyond 3 years: 30

*Comment: the primary place to network was first within the Law Working Group. This target has been reached.*

Members of interest groups. Unit: number of individuals

At the beginning: 0

At the end: 45

Beyond 3 years: 45

*Comment: this figure refers to individual in other NGOs not part of the Law Working Group. These are both from other EEB Working Groups, the ECO Forum and from wider civil society. This target has been reached.*

Other. Unit: number of individuals

At the beginning: 0

At the end: 5

Beyond 3 years: 10

*Comment: this figure refers to EU officials otherwise not involved or targeted through the project. Occasions to network are at events and this target has been reached. If events will continue to be exclusively online, in 3 years it might be a challenge to network informally in this way.*

### **KPI 12.2 – Professional training or education**

Members of interest groups. Unit: number of individuals

At the beginning: 0

At the end: 60

Beyond 3 years: 100

*Comment: between EEB staff and at least the EEB board members, this target has been reached.*

### **KPI 13 – Jobs**

Unit: number of FTE

At the beginning: 0

At the end: 2

Beyond 3 years: 2

*Comment: this project secured 2 FTE of permanent staff at the project. Thanks to co-funding and finding the advocacy opportunities to link the project with specific activities on waste and biodiversity, two additional staff were hired for the project for the period of 7 months.*

### **KPI 14.1 – Running costs/operating costs during the project and expected in case of continuation/replication/transfer after the project period**

Unit: €

At the beginning: 0

At the end: 666,668 EUR

Beyond 3 years: 1000002 EUR

### **KPI 14.3 – Future funding**

Grants, subsidies. Unit: €

Beyond 3 years: 600,002

Beneficiaries' own contribution. Unit:

Beyond 3 years: 400,000

*Comment: this is a breakdown of the costs under KPI 14.1*

#### **KPI 14.4.1 – Entry into new entities/projects**

*The tool expected all three – transfer, continuation and replication – sections to be filled in, although “continuation” is more appropriate one for this project.*

Transfer: with the increased engagement and knowledge-sharing among EEB members in the Member States over the two years of the project, the members are better positioned and equipped to continue to work on implementation issues of EU environmental law and policy at the national levels. This is not a transfer to another sector in society or other target audience or region, so this may be more appropriately described as “continuation”.

Continuation: The capacity-building with EEB members and partners, as well as the regular meetings in the law working group, have formed the basis for continued dialogue and cooperation on efforts that members are working on to improve environmental implementation. Implementation is an issue which touches on all areas that the EEB works on and will be highlighted during the course of the project, so the project will allow for more in-depth work on implementation beyond the funding period.

Replication: After the project ends, the EEB will continue to raise awareness on implementation problems to EU officials, thanks to the network built, also through the structures of the Law Working Group and the other working groups in the course of this project. So we should fill here 'continuation', but the database does not allow us to do so.

## **8. Comments on the financial report**

### **8.1. Summary of Costs Incurred**

Because all our Law Working Groups were organised in Brussels, therefore there was no expenditure for the venue of the meetings as they took place at the EEB office, and because of the COVID-19 pandemic, which meant that there were no costs associated to the last online working group, we underspend in that category (other costs). However, underspending in other costs was balanced out with a slight overspending on personnel costs and the training. Extra costs in personnel were due to the project extension by three months, although this was not a huge over expenditure (€ 8035,95). As for the training (external assistance), there was an excess in spending by € 5079,93. In total we saved nearly € 6,000.

Statement of EXPENDITURES	Total costs with non-recoverable VAT (in I)	Total ELIGIBLE costs with non-recoverable VAT (in I)	Statement of INCOME (to cover the total cost)	I	% of eligible costs
<b>PERSONNEL</b>	561.889,95	561.889,95	Requested Union contribution	396.097,30	0,60
			Beneficiary's own contribution	35.194,02	0,05
			Co-financer's contribution	228.870,85	0,35
<b>TRAVEL</b>	9.384,48	9.384,48	Direct income of the project	0,00	0,00
<b>EXTERNAL ASSISTANCE</b>	25.079,93	25.079,93			
Durable goods - <b>INFRASTRUCT</b>	0,00	0,00			
Durable goods - <b>EQUIPMENT</b>	0,00	0,00			
Durable goods - <b>PROTOTYPES</b>	0,00	0,00			
<b>CONSUMABLES</b>	12.880,84	12.880,84			
<b>OTHER direct costs</b>	7.738,97	7.738,97			
<b>OVERHEADS</b>	43.188,00	43.188,00			
<b>TOTAL</b>	<b>660.162,17</b>	<b>660.162,17</b>	<b>TOTAL</b>	<b>660.162,17</b>	

\*) If the EASME has officially approved a budget modification through an amendment, indicate the breakdown of the revised budget. Otherwise this should be the budget in the original grant agreement.

\*\*\*) Calculate the percentages by budget lines: e.g. the % of the budgeted personnel costs that were actually incurred

## 8.2. Accounting system

### Brief presentation of the accounting system(s) employed and the code(s) identifying the project costs in the analytical accounting system

EEB are using Winbooks as accounting software. Every time we have a new project our accounting creates a new code "analytical 1" according the year and the budget line

- G18/010 EIR\_EC LIFE Prep
- G18/020 EIR.A1.Travels IMPEL-5.000.F2
- G18/025 EIR.A1.Travels Country dialogue-5.000.F2
- G18/030 EIR.C2.Ex.AssTraining S1-10.000.F3
- G18/050 EIR.B3.Cons.Studies/Websites-5.320.F5
- G18/051 EIR.B4.Equipment-9.680.F5
- G18/061 EIR.A1.WG2/Publ.Ev-7.100..F6.Law 10/18
- G18/062 EIR.A1.WG3-5.000.F6.Law 05/19
- G18/063 EIR.A1.WG4-7.100.F6 LAW 10/2019

### Brief presentation of the procedure of approving costs

All expenses must be approved by the coordinator of the project, the Financial Director and the Secretary General before they are paid. Each expense is assigned to a project with a specific code, then it is integrated into the system.

### Type of time recording system used, i.e. electronic or manually completed timesheets

We register the timesheets with an excel system, these are checked at the end of each month by hr officer who records absences and holidays.

### Brief presentation of the registration, submission and approval procedure/routines of the time registration system

We register the timesheets with an excel system, these are checked at the end of each month

by the HR officer who records absences and holidays. At the end of the month, each employee signs his or her own timesheet in agreement with the supervisor.

**Brief explanation on how it is ensured that invoices contain a clear reference to the LIFE project showing how invoices are marked in order to show the link to the LIFE project**

Each time an expense is recorded, it is assigned to a project with the corresponding "analytical 1" code, if there are any changes, these are in any case inserted first in the winbooks system.

8.3.Partnership arrangements (if relevant)

N/A

8.4.Certificate on the financial statement

N/A

8.5.Estimation of person-days used per action

Original % FTE	Who	Daily rate in EUR	Working days
30%	Sergiy Moroz – Water and Biodiversity Senior Policy Officer Laura Hildt	227.54	307.50
	Stephan Piskol – Project Officer Biodiversity, Agriculture and Climate	216	6.8
30%	Roland Joebstl – Senior Policy Officer Energy and Climate	350.68	38.16
75%	Francesca Carlsson – Legal Officer	281.74	424.74
30%	Margherita Tolotto – Policy Officer Air and Noise	293,82	137.50
30%	Piotr Barczak – Senior Policy officer Waste / Stephane Arditi – Project Manager Circular Economy - Darko Bizjak	233.32	117.03

100%	Marie-Amelie Brun – Communications Officer	243.46	471.18
	Ian Carrey – Communications Director Anton Gemma Emma	328.28	76.32
10%	Jeremy Wates – Secretary General	649.84	51.32
19%	Patrick ten Brink – EU Policy Director	522.44	116.32
10%	Abraham Lombrana – Seminar Coordinator  Alessia Biasoli – Coordinator Assistant	168.62	52.50
10%	Isabel De Jesus – Finance Director	467.66	47.76
	Tatiana Santos – Chemicals Project Manager Elise Vitali	293.89	99.84
	Bérénice Dupeux – Agriculture Policy Officer	272.07	3.16
	Laura Hildt – external expert	115.00	33.50