EUROPEAN RISK FORUM – COMMUNICATION 13

EUROPEAN COMMISSION PUBLIC CONSULTATION ON COMMISSION GUIDELINES FOR EVALUATION

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EXECUTIVE SUMMARY

This is a contribution by the European Risk Forum (ERF, www.riskforum.eu) to the public consultation launched by the European Commission on its Guidelines for Evaluation and the related Evaluation Standards (ES). The ERF considers that the draft guidelines contain several elements reflecting both the OECD core principle for high quality regulatory management system as well as international good practices. As such, the draft constitutes a valuable basis for establishing a well performing ex post evaluation system and it is to be welcomed. The ERF invites the Commission to consider a number of areas of improvements, including:

- Provide complementing guidance material on methodological aspects developed by an open process that encompasses public participation and consultation;
- Amend Evaluation Standards to explicitly affirm the principle that no new legislative initiative should be adopted by the Commission unless it is preceded by a retrospective analysis;
- Make the Secretariat-General of the Commission (SecGen) responsible for steering, planning and strategic functions of the ex post evaluation process;
- Issue criteria from the SecGen to the DGs to guide the selection and choice of regulations to review and to inform the DGs' screening and rolling plans;
- Equip the SecGen's to adequately undertake the new tasks;
- Revise the scope of the guidelines to encompass key implementation decisions;
- Establish quality standards related to the evaluation function in the Commission, requiring studies, information, and data to be based on widely-accepted, sound, and objective scientific practices ('the scientific method');
- Require evaluators to make widespread use of high quality scientific advice to evaluate the relevance and effectiveness of risk management measures;
- Consolidate all relevant guidance to support ex ante and ex post evaluation;
- Revise governance arrangements for individual evaluations to support earlier intervention by SecGen and stakeholders;
- Seek direct inputs and feedback from stakeholders and affected parties should be actively sought at every stage of the evaluation process;
- Consider opening up membership of the Steering Group to external experts
- Place adequate weight on the impacts of EU regulation upon the main trading partners and appropriate related guidance should be issued;
- Improve the quality of risk management measures prior to implementation, through the development of specific guidance for their ex ante assessment;
- Strengthen the role of the Commission's Impact Assessment Board to ensure proposed measures can be fully evaluated;
- Set out clearly the further actions arising as a result of a retrospective review;
- Make SecGen responsible for the cross-DG Quality Review Panel on a systematic, permanent basis, and publish annual reports;
- Submit to Parliament a representative summary of the retrospective analyses carried out in the previous year; and,
- Maintain a public library listing good practices from the services that reflect the various elements constituting evaluation reports.

1. INTRODUCTION

This is a contribution by the European Risk Forum (ERF, www.riskforum.eu) to the public consultation launched by the European Commission on its Guidelines for Evaluation and the related Evaluation Standards (ES). The draft document has been published for public comments from 12 November 2013 to 25 February 2014.

If well-designed and carried out systematically, high quality evaluations – notably including ex post (retrospective) assessments of regulatory decisions – facilitate the reform and improvement of existing regulations; enhance accountability and transparency; improve the quality of future regulatory decisions; and reduce the risk of regulatory failure.

The Commission has acknowledged the instrumental role that evaluation plays in the Smart Regulation agenda, most recently through its 2013 Communications on EU Regulatory Fitness and on Evaluation.[1] The "evaluating first principle" is a sound basis to rationalise regulatory interventions.

The ERF welcomes the opportunity to contribute to this exercise and express full support for the commitment that the Commission is demonstrating to upgrade the evaluation function in the EU decision-making. While considerable progress has already been achieved, continued efforts need to be made in the next months.

2. GENERAL COMMENTS

The ERF considers that the draft Guidelines (November 2013 version) contain several elements reflecting both the OECD core principle for high quality regulatory management system as well as international good practices. As such, the draft constitutes a valuable basis for establishing a well performing ex post evaluation system and it is to be welcomed.

The following positive provisions included in the draft are specifically worth highlighting:

- The reference to the "evaluation first principle";
- The acknowledgment of the fundamental importance that needs to be attached to planning;
- The attention given to the principle of transparency and publication;[2] and
- The encouragement to make use of first-hand evidence from end users and those affected by regulatory outcomes.

The ERF nonetheless understands from the online text accompanying the consultation documents that the set of Guidelines put on public consultation represents an initial document providing introductory elements to conceptualise evaluation and design the governance of the evaluation function within the Commission. In particular, the Commission informs that "[m]ore detailed supporting information will be provided over time on our internal websites and by evaluation specialists in the Directorates General."[3]

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[1] See COM(2012) 746 of 12 December 2012 and COM(2013) 686 of 2 October 2013, respectively.

[2] In particular, it is positive that the Commission commits to timely and centrally publish multi-annual evaluation plans; individual evaluation mandates; forthcoming initiatives; and the final reviews together with the related Quality Assessment reports.

[3] See http://ec.europa.eu/smart-regulation/evaluation/consultation/index_en.htm. The draft Guidelines refer to unpublished annexes at p.38.

Further critical issues related to evaluation are indeed excluded from the Guidelines under consultation – in particular the following are lacking:

- Rigorous and uniform definitions of key terminology;
- Detailed data collection methodologies;
- Explicit techniques to identify and analyse causal relations, as well as to evaluate and compare (cumulated) impacts;
- Recognition of the need to develop 'horizontal' requirements for risk management laws and rules; and,
- Possible adjustments in the methodologies associates to the type of regulatory act reviewed (e.g. directives or implementing or delegated acts).

The ERF believes that these components should be integral part of the overall guidance material that the Commission should standardise and enforce. The ERF takes note of the limited character of these Guidelines for the elaboration of the present submission and is available to contribute to future public consultation initiatives on the further supporting information.

RECOMMENDATION 1: The Draft Guidelines are one first, positive step but require complementing guidance material on methodological aspects developed by an open process that encompasses public participation and consultation.

3. SPECIFIC COMMENTS

With regard to the governance of the evaluation function in the Commission, the ERF believes that the current draft Guidelines would significantly benefit from a number of amendments, which would enhance the accountability and effectiveness of the overall evaluation system. The ERF invites the Commission to consider the following areas of improvements:

- Planning aspects (section 3.1.)
- Scope of the reviews (3.2.)
- Quality standards (3.3.)
- Involvement of stakeholders (3.4.)
- Multi-level arrangements (3.5.)
- Linkages with ex ante Impact Assessment (3.6.)
- Reporting and institutional learning (3.7.)

3.1. PLANNING ASPECTS

3.1.1. Evaluating First

Linking the ex-post evaluation process with the planning process is very important and the Commission has enshrined this in the "evaluate first principle". The draft Guidelines refer to this important good international practice without however fully and explicitly drawing the

conclusions. The revision of the Evaluation Standards offers the possibility to reaffirm the key principles.

RECOMMENDATION 2: Evaluation Standards should be amended to explicitly affirm the principle that no new legislative initiative should be adopted by the Commission unless it is preceded by a retrospective analysis. This requirement should help, in the short to mid-term, to re-allocate the services' resources according to priority axes, raising the relative importance of ex post evaluation.

- To that end, when appropriate the Secretariat General, possibly upon consultation with the Impact Assessment Board, should issue "prompt letters" so as to promote targeted, value-added regulatory evaluation.
- Whenever a regulatory initiative is taken based on an invocation of the Precautionary Principle, a binding review clause should be mandatorily inserted in the act.
- If a legislative initiative is adopted without an Impact Assessment, the resulting regulation must be the subject of a retrospective analysis within a two to five year period from implementation.

3.1.2. Central Steering and Oversight Function

International experience suggests that reviewing individual regulations is often difficult, resource-intensive (in terms of time, skills, and money), and sometime subject to opposition from interest groups. Recent research also suggests that regulators who create laws and rules may lack the incentive or inclination to revise them.[4]

In the light of this, further consideration should be given to the likely effectiveness and desirability of the use of a predominantly de-centralised approach for the governance of the ex post evaluation process.

While it makes sense to keep relevant parts of the Commission directly involved in the review process, it is acknowledged that the majority of evaluations will be subcontracted to external consultants. Moreover, the Fitness Check and REFIT initiatives require the Commission to ensure coherence, synergies and economies of scale, which a centralised steering function is likely help maximise. The relevance of institutionalising the oversight function also in relation to the ex-post evaluation system is confirmed by the OECD 2012 Recommendation on Regulatory Policy.[5]

A central steering function will also ensure a more effective allocation of budgetary resources.

RECOMMENDATION 3: The Secretariat-General of the Commission (SecGen) should take over the steering, planning and strategic functions of the ex post evaluation process, including ensuring compliance with the strategic priorities and overarching goals of the Commission's President and responding to stakeholders' calls for reviews. This is similar to the role played by the SecGen in the IA process.

RECOMMENDATION 4: The SecGen should issue criteria to the DGs to guide the selection and choice of regulations to review and to inform the DGs' screening and

[4] See for example, McLaughlin P.A. and Williams R. 'The Consequences of Regulatory Accumulation and a Proposed Solution' (George Mason University, Mercatus Center Working Paper 14-03, 2014)

[5] See Statement #3 of the OECD 2012 Recommendation of the Council on Regulatory Policy and Governance, at http://www.oecd.org/gov/regulatory-policy/2012recommendation.htm.

rolling plans. This will be particularly relevant when it comes to "thematic or ad hoc" evaluations whose need emerges upon from "strategic decisions". In such cases, the number and types of additions to the evaluation plan and their prioritisation must be assisted by a central steering function.

RECOMMENDATION 5: The SecGen's in-house evaluation function should be adequately equipped to undertake the new tasks, partly by drawing from existing expertise within the services. An appropriate provision on the capacity and steering role of the SecGen should therefore be inserted in the Evaluation Standards.

3.2. SCOPE OF THE REVIEWS

3.2.1. Selection of Evaluation Criteria

The draft guidelines require each retrospective analysis to include by default all five main "evaluation criteria" – namely relevance, effectiveness, efficiency, coherence and EU added value – unless due justification is provided for omitting one or more of them. This holistic approach is to be welcomed.

However, resource constraints within the Commission constraints may lead to one or more of the above criteria being omitted from individual evaluations. Resource availability should not drive such decisions. Instead, the purpose of an evaluation should influence its scope.

RECOMMENDATION 6: The purpose of the evaluation exercise should be a key element in the initial choice as to whether to include any given regulation in the review programme or not. Moreover, SecGen should be closely involved in deciding not only which review should be carried out but also which purpose and scope they should have.

3.2.2. Implementing Decisions

The effectiveness of framework laws depends, almost entirely, upon a series of implementing decisions. These encompass formal rules and adjudications, standards, and guidance. For policies designed to manage risk, this is the legislative model used to meet social and economic goals. A well-governed ex post evaluation process should ensure that all government actions which implement laws are subject to retrospective analysis. If this is not done, then the effectiveness of laws is not adequately examined, and the "administrative state"[6] remains outside the scope of regulatory process management standards.

RECOMMENDATION 7: **Revise the scope of the guidelines to encompass major technical implementation decisions,** including guidelines drawn up by EU agencies; major decisions by EU agencies that embed risk management assumptions; comitology (or equivalent) decisions that affect multiple products, substances or processes; and comitology (or equivalent) decisions subject to regular and detailed scrutiny by the European Parliament.

[6] On the notion of "administrative state" see the ERF Policy Note 21 on "An EU Law on Administrative Procedure", of November 2012.

3.3. QUALITY STANDARDS

3.3.1. Sources of Evidence

The draft Guidelines do not establish clear requirements and standards for evaluators to use to appraise the quality of the evidence they collect and use. Although, the guidelines explicitly stress the need to base policy decisions on "the best available evidence", this is not defined. Indeed, other definitions included in the guidelines are less rigorous.

RECOMMENDATION 8: The SecGen should establish quality standards related to the evaluation function in the Commission, requiring studies, information, and data to be based on widely-accepted, sound, and objective scientific practices ('the scientific method'), including peer-reviewed science. Such standards should be uniform for all type of data collection, validation and use by the Commission, including for IA. Recourse to "the best available evidence" should be set as a general, compulsory rule for any kind of evaluation. Evaluation Standards should be amended accordingly.

RECOMMENDATION 9: Require evaluators to make widespread use of high quality scientific advice to evaluate the relevance and effectiveness of risk management measures. This should be supported by the introduction, as referred to above, of wider evidential and process standards for the use of scientific evidence in decision-making.

3.3.2. Interpretation of Evidence and Uncertainty

The current draft is silent as to how evaluators should address uncertainty. It correctly recommends the use of "triangulation" as a possible method to validate evidence.

However, when considering the regulation of risk, it is important to stress the role that uncertainty plays in ascertaining the effectiveness of regulatory measures.[7] Moreover, uncertainty is central to the scientific method and will, therefore, have played a part in the ex ante analysis of a proposed measure, if the "problem definition" was based on a scientific risk assessment. Evaluators will need to engage with this in a systematic way, recognising the "horizontal" nature of evaluations of measures based on scientific evidence.

Finally, the draft remains silent on the techniques to estimate the contribution of different factors, and the Commission refers for the time being to the development of further internal guidance.

RECOMMENDATION 10: The SecGen should coherently consolidate and publish under a single framework all relevant guidance developed to support the ex ante and ex post evaluation activities of the Commission, not least including how to handle uncertainty. In doing so, it should

- Revise the Commission's technical guidance for assessing the costs and benefits of risk management decisions, stressing the importance of risk acceptance, basing intervention on the findings of a peer-reviewed risk assessment, highlighting the difference between hazard and risk, and recognising the limitations of different regulatory options;

[7] The example of evaluating air quality control measures has been brought to illustrate this challenge. See Lutter, R. (2013), "Regulatory Policy: What Role for Retrospective Analysis and Review?", in *Journal of Benefit-Cost Analysis*, Vol.4/1, pp.17-38.

- Develop new technical guidance for the assessment of "non-market" and complex regulatory costs and benefits, helping officials understand the impact of technical regulatory decisions as well as secondary legislation on investment and innovation processes, the diffusion of new technologies, and levels of sales and margins, and benefit-risk trade-offs; and
- Develop a comprehensive understanding of "horizontal" (multi-sectoral) unintended consequences of risk management rules, and develop related guidance. Issues to consider include impacts on innovation, dissemination of new technologies, loss of existing technologies, demand stigmatisation, and risk-risk.

3.3.3. Steering Group – Quality Oversight

With regard to oversight of the quality of evaluations, the draft guidelines correctly require a Steering Group be set up and be entrusted with a crucial task in the Quality Assessment (QA) process.

The draft nonetheless appears vague with respect to avoiding excessively *ad hoc* interpretations by the Groups of the (already quite general) QA form set out in the guidance. As things stand, this makes it difficult for the SecGen to monitor the performance of Steering Groups. Whilst the transparency measures (most notably publication of the QA) in themselves constitute a critical success factor, they occur at a late stage and do not appear adequate to trigger effective intervention when the evaluation is still on-going. A further area of concern is the missing specification of the status (binding character or not) of the opinions issued by the Steering Group.

RECOMMENDATION 11: The governance arrangements for the Steering Groups for individual evaluations need to be revised to support more and earlier intervention by SecGen and stakeholders.

3.4 INVOLVEMENT OF STAKEHOLDERS

The draft guidelines encourage evaluators to inform stakeholders and to gather and use evidence from those affected by the policy and regulatory decision under review. Examples are provided in relation to the general transparency and involvement requirements.

Whilst, this clearly reflects good practice, a more institutionalised *interaction with* stakeholders and those affected by regulation – rather encouraging the provision of *information to* them – would be desirable at all stages of the evaluation process, including in the evaluation planning and design.[8] Indeed, the publication requirements set out in the guidelines appear to be meant for mere information purposes.

RECOMMENDATION 12: Direct inputs and feedback from stakeholders and affected parties should be actively sought at the stage both of compiling the evaluation plan, designing the evaluation mandate, obtaining evidence, and drawing up conclusions. This is critical to ensure not only that the evaluation addresses the right questions and these

[8] See Statements #2 and #3 of the OECD 2012 Recommendation of the Council on Regulatory Policy and Governance (v. supra). US President Obama's Executive Order 13610 is an example of implementation of the principle of "public participation in retrospective analysis". See US Executive Order 13610 on Identifying and reducing regulatory burdens of 10 May 2012, at:

http://www.whitehouse.gov/sites/default/files/docs/microsites/omb/eo_13610_identifying_and_reducing_regulatory_burdens.pdf

are well drafted, but also that the evaluation follows an appropriate approach. The opening to interactive consultation is hence a corollary of the commitment by the Commission to consider "constructive criticism", as stated in the draft Guidelines.

RECOMMENDATION 13: The Commission should consider opening up membership of the Steering Group to external experts, including representatives of stakeholders, most notably end-users and those directly affected by the measure under review.

3.5. MULTI-LEVEL ARRANGEMENTS

Inter-institutional cooperation and multi-level collaboration arrangements are an integral part of the EU's Smart Regulation strategy. The Commission has announced that pilot joint evaluations with interested Member States are planned to be launched at the outset of the new evaluation regime.[9] This is to be welcomed. Such a multi-level framework is of outmost importance given the diversity and complexity of implementation conditions as well as the lack of institutional equivalence across jurisdictions.

However, the draft guidelines do not give sufficient attention to the design of an organisational and procedural framework to institutionalise the interface with national or sub-national (where appropriate) authorities. Nor do they adequately address trans-jurisdictional (i.e. extra-EU) effects of EU regulation.

RECOMMENDATION 14: The Commission, jointly with the Member States, should consider upgrading existing monitoring mechanisms for implementation of and compliance with EU policy and regulatory decisions, including using multi-stakeholder public-private platforms; relying on networks of authorities; and organising "composite meetings" throughout the life-cycle of the measures.

RECOMMENDATION 15: Each service should be required to liaise with relevant enforcing authorities at the relevant levels as well as representative stakeholders at those levels in order to facilitate the design and organisation of the data collection, validation and harmonisation phases.

RECOMMENDATION 16: Each retrospective evaluation should place adequate weight to the impacts of EU regulation upon the main trading partners and appropriate related guidance should be issued.

[9] European Commission, COM(2012) 746. The same Communication stresses the "Inputs from Member States' administrations and institutions are of critical importance for the design and evaluation of EU legislation." (p.11)

3.6. LINKAGES WITH IMPACT ASSESSMENT

3.6.1. Risk Management Measures

In order to be effective, retrospective analysis requires clarity of the intended policy objectives, impact and outcome. These objectives provide a framework by which the law can be scrutinised and judged after it is implemented. Ex ante IA is central to this process. The subject areas and assessments set out in IAs can be used to determine the questions around which *ex post* evaluation is conducted. The draft Guidelines acknowledge this but do not appear to outline the operational implications of this important step.

Indeed, risk management measures are unlikely to be evaluated effectively unless they are based on strong, widely-accepted scientific evidence; a clear, causal link between risk, government action, and outcome; and quantified costs and benefits.

Indeed, the route to useful evaluation begins with the policy objective, and continues through the design of the legislative or regulatory proposal and its ex ante appraisal. Any weaknesses in this process will limit the evaluation process. This needs to be recognised in the guidance. Risk management measures, because of their complexity and importance, exemplify this.

RECOMMENDATION 17: Improve the quality of risk management measures prior to implementation, through the development of specific guidance for the ex ante assessment of such proposals. Guidance should require the "problem definition" to be based solely on high-quality science, supported by peer review of relevant risk assessments. It should ensure that the proposed risk management rules have tangible, measurable objectives. The use of cost effectiveness tools should be strongly encouraged along with the quantification of costs and benefits. Finally, regulators should be required to seek the least onerous risk management measures, to ensure that options target the causes of the problem directly, to select only those options based on proven effectiveness and workability, to act proportionately, and to consider unintended consequences.

RECOMMENDATION 18: Strengthen the role of the Commission's Impact Assessment Board to ensure proposed measures can be fully evaluated. The IAB should be required to ensure that, for risk management measures there are measurable outcomes, quantified metrics of costs and benefits, and a clear link between problem definition and risk management option. Though these reviews, the Board should be able to verify that effective retrospective analysis of a proposed measure is feasible.

RECOMMENDATION 19: Ex ante IAs should systematically outline a more extensive plan for the subsequent retrospective evaluation of the proposed rule. This will require:

- Elaboration of more detailed guidance, than is currently presented in the IA Guidelines, by the SecGen. This should include the inclusion of monitoring arrangements which, where appropriate reflect the decision-making cycles and anticipated behavioural changes of affected entities; and
- Greater oversight by the IAB of the services' compliance with this requirement.

3.6.2. "Re-starting" the Assessment Cycle

After the completion of retrospective analysis, the policy cycle is likely to commence again, particularly if the original problem remains unresolved. This needs to be recognised in the guidance.

RECOMMENDATION 20: Retrospective analyses should clearly set out the further actions arising as a result of the review. This will require:

- The services' responses to the conclusions and recommendations of the evaluation reports should be made public.
- Recommendations from retrospective analysis should be included in any consultation exercise associated with the policy formulation phase.
- Where findings from the retrospective analysis substantially differ from the benefits and costs that were expected prior to the rule's implementation, the Commission should automatically carry out an IA to determine whether to confirm, amend or repeal the regulation reviewed.

3.7. REPORTING AND INSTITUTIONAL LEARNING

3.7.1. Evaluation Reviews

Wider experience suggests that two of the success factors which determine the overall performance of the evaluation process and ensure institutional learning are: first, regularly collecting information on the status of progress of the evaluation system and on the application of the guidelines; and second, making adjustments when necessary so as to resolve shortcomings.

The draft Guidelines acknowledge this indirectly. However, the nature, role and powers of the proposed "cross-DG Quality Review Panel" appear to be inadequate in this respect. This Panel is, moreover, not foreseen to be a standing body. These are procedural and institutional weaknesses.

In contrast, the experience that the Commission has acquired in the past few years with the oversight and reporting functions granted to the Impact Assessment Board (IAB) suggests that a different approach would be more appropriate and effective.

RECOMMENDATION 21: The SecGen should take over the role and responsibilities currently envisaged for the cross-DG Quality Review Panel on a systematic, permanent basis, and publish annual reports – as required by Art.318 TFEU, and announced in the Communication on Regulatory Fitness[10]. Such reports should include "horizontal" impacts and unintended consequences. For risk management measures, negative, horizontal impacts, based on the experience of the ERF, are likely to include risk-risk, defensive R&D, demand stigmatisation, loss of existing technologies, increases in time, cost, and uncertainty of innovation projects, and delocalisation of innovation and R&D.

RECOMMENDATION 22: The Commission shall submit to Parliament a representative summary of the retrospective analyses carried out in the previous year, critically assessing the (marginal and cumulated) benefits and costs; the effectiveness and the efficiency (for instance in relation to the initial IAs) of those EU regulatory interventions, per economic sector, affected group, regions and other criteria.

[10] European Commisison, COM(2012) 746.

3.7.2. Good Practices Library

The current Guidelines do not foresee the public dissemination of examples of good practices in retrospective analysis, despite the fact that the tool has proven its merits already in the context of the IA system.

RECOMMENDATION 23: The SecGen should introduce and maintain a public library listing good practices from the services that reflect the various elements constituting evaluation reports.

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

European Risk Forum

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

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

The Forum believes that:

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

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

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

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

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

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

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

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