

# ***“Methodology and Feasibility of Sustainability Impact Assessment. Case: Federal policy-making Processes”***

## SUMMARY OF THE FINAL REPORT

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The research project “*Methodology and Feasibility of Sustainability Impact Assessment. Case: Federal policy-making Processes*” aimed at contributing scientific insights to be taken into account when elaborating a methodological and institutional framework for the implementation of SIA in the Belgian federal context. The project duration was July 2004 till February 2006 and the research was done by a team of researchers from different institutions and with different backgrounds: Centrum voor Duurzame Ontwikkeling (CDO, UGent), Centre d’Etudes du Développement Durable (CEDD, ULB), Institut pour un Développement Durable (IDD), Association Universitaire de Recherche sur l’Action Publique (AURAP, UCL), Centrum voor Milieurecht (UGent), Service de Mathématiques de Gestion (SMG, ULB).

### **1. The value added of SIA**

Sustainable development policies have the ambition of integrating economic, environmental and social concerns. To get an early indication of whether policy proposals meet sustainable development criteria, governments and scientists are developing forms of Sustainability Impact Assessment (SIA). SIA has developed out of sectoral or

project-level assessments such as Environmental Impact Assessment (EIA), Strategic Environmental Assessment (SEA) and policy assessments such as Regulatory Impact Assessment (RIA). SIA is still in an early, developing phase and a commonly accepted definition of SIA does not exist, but the main characteristics which are usually attributed to SIA include:

- An *ex ante* assessment: SIA is undertaken during the early stages of policy formulation, before a final decision on the policy concerned has been taken
- An integrated assessment: the traditional sectoral analysis is expanded by considering the broad social, environmental and economic impact of policies and weighing them against each other
- A participative assessment: input into policy-making is broadened from politicians and civil servants to stakeholders and civil society

The common ground between SIA and other forms of impact assessment is their objective or function: they aim at the evaluation of a policy proposal or project at a more or less early stage in the decision-making process, by considering different policy options (or alternatives) in order to strengthen the positive outcomes of the proposed policy, diminish the

negative (side-)impacts of the policy and determine the necessary mitigation or compensation mechanisms that will allow rendering a positive overall impact of the policy. A distinctive characteristic of SIA is that it does not take a policy goal as given, but assesses whether the policy contributes to sustainable development. This characteristic distinguishes SIA from e.g. RIA, where the policy goal as such is not discussed. The main objectives of SIA can then be described as follows:

- SIA assesses whether a proposed policy contributes to sustainable development...: SIA does not just evaluate a proposed policy against its own goals but assesses whether it contributes to sustainable development.
- ...by informing about impacts and policy options...: SIA moves beyond simple identification of potential negative consequences of particular policies and instead promotes the articulation and development of policy alternatives and supportive accompanying measures, which seek to emphasize and promote policy benefits while mitigating potential negative impacts.
- ... in a systemic and reflexive way: SIA follows well-defined methodologies and institutional procedures in order to make the process transparent and create a learning environment.

SIA is part of a learning process during which information is fed back into the political decision-making system in a procedurally anchored way. The value added of SIA for decision-making is often caught under terms such as: coordination of policies towards sustainable development, better governance, evidence-based decision-making, enhancement of the quality of the decision-making process, creation of public support for sustainable development policies. However, while SIA is theoretically desirable, operationalising SIA demands seeking answers to numerous problems. A typical problem with which SIA is confronted, is how to assess whether a policy proposal contributes to sustainable development. Other problems which have to be solved include the methodological framework chosen for SIA and the institutional structure within which SIA has to function.

Thus, the way SIA is shaped and implemented, will depend on the overall

characteristics of the policymaking process in which it has to take place. Basically, one can distinguish two competing conceptions of policy-making:

- Policymaking as rational problem solving: policy-making is seen as a kind of problem-solving where clearly defined and agreed upon objectives can be optimized with respect to budgetary and informational constraints. In this perspective SIA is a new kind of *tool*, a package of concepts, methods and techniques that help in dealing with long-term and global impacts, uncertainties, multi-disciplinarity, etc. What makes this tool specific is its emphasis on integration: integration of concepts, methods and models.
- Policymaking as discursive practices: policy-making is seen as a struggle between social discourses and practices and as the construction, through deliberation, of a common discourse on values, ends and means. In the discursive perspective, SIA is a framework for a collective deliberative *process* in which all actors learn to integrate sustainable development in the way they consider and frame problems, solutions, decisions and actions.

In other words whilst SIA in a rational decision-making perspective is above all outcome oriented (what matters is the outcome for the improvement of the policy proposal), in a discursive perspective, it is the process itself that matters (the emphasis is on policy-learning and long term capacity-building). Of course, the choice is not between an idealistic pushed-too-far deliberative SIA and an idealistic pushed-too-far scientific-rational one. It is between a realistic well-balanced deliberative model and a well-balanced scientific-rational one.

## 2. Methodological considerations

Although a universal form of SIA does not exist, SIAs follow a general procedural structure adapted from existing assessments such as RIA, EIA and SEA, following the mechanics of institutional and political policy-making cycles.

The first step is a *screening* exercise that helps to decide whether a policy proposal

should undergo SIA. Second is the *scoping* phase, which is meant to decide how the assessment will be done. Third, the policy proposals which are selected, undergo an *assessment*, comprising several stages:

- A description of the *problem* the policy wants to address, the causes of the problem, the people or policy domains affected (which will rely heavily on the screening stage).
- An explicit qualitative and quantitative formulation of the *objectives* of the policy.
- A formulation of *policy options* which would allow to reach the defined objectives (this stage is of crucial importance since it is these different policy options that will be assessed and weighted against each other).
- An *analysis* of the impacts of the identified policy options: this step is at the heart of SIA. It usually follows a structure in which the important environmental, economic and social impacts of the different policy options are identified or predicted, and then qualitatively and/or quantitatively assessed. Who is affected and in what way is also described.
- A *comparison* of the different policy options on the basis of the impact analysis: positive and negative impacts of the options are listed and compared, and in rare cases can be ranked.

Fourth, after the assessment, an *evaluation report* explains the results of the different steps as well as the processes followed (e.g. the way in which information was gathered, stakeholders participated etc.) and enters the decision-making process, where the *follow-up* to the assessment is decided. In most settings of Impact Assessment, the evaluation reports are accessible to the wider public.

Except for scoping and reporting, each stage of the process calls for decisions about the methods and techniques that will be used. As for screening, for example, except if it is done on a purely prescriptive basis, one will have to choose between simple checklist or more precise but more demanding methods such as cross-impact matrices, with or without weighting, etc. The options are even more numerous for impact prediction, ranging from “quick- and-dirty” qualitative methods to “several-hundred-equations” models. The situation is a bit simpler with evaluation methods, where one has to choose between aggregative and non-aggregative (Multi-

criteria or deliberative) models and – in case aggregative methods are chosen – between monetary (Cost-Benefit Analysis) and non-monetary ones (Analytical Hierarchy Process, Multi-Attribute Value Theory, outranking multi-criteria methods).

Normally, a process-oriented vision of SIA will put more emphasis on values than on facts. Therefore, more will have to be invested in participative mechanisms and/or on methods focusing mainly on non-monetary aggregated values such as the AHP. Conversely, a more outcome-oriented conception of SIA will probably focus more on facts and therefore on quantitative modelling.

	SIA	
	<i>Process-oriented</i>	<i>Outcome oriented</i>
FACTS	Soft, qualitative methods	Quantitative modelling
VALUES	Non-monetary multi-criteria methods, deliberative democracy	Cost-Benefit Analysis

Table 1. Methodologies for different conceptions of SIA

### 3. The institutional and participatory context of SIA

The utility and effectiveness of SIA will be enhanced or weakened by the policy context within which SIA has to function. SIA will get more chances in a context where e.g. policies are framed within a sustainable development discourse, where experience exists with integration of policies over policy domains, where policy evaluation is an institutionalized practice, where involvement of stakeholders in policy preparation is an established practice etcetera.

#### 3.1. The institutional context at federal level

An analysis of the Belgian federal policy level at this point presents a mixed picture. On the one hand, Belgium has institutionalized a structure for sustainable development policies which compares favourable to other countries. Since 1997 already, it has a federal law on the

coordination of federal sustainable development policy. Through this law and other legislation, it has introduced amongst others a four year Federal Plan and a two year Federal Report on sustainable development, a Programmatic Public Service on sustainable development, an Interdepartmental Commission, Cells for Sustainable Development within each federal administration, a Task Force with experts in the Federal Planning Bureau, and an Advisory Council composed of the most important stakeholders. These institutions can serve as point of departure for the newly to be developed SIA.

Besides, the idea of introducing SIA in the federal policy context has been on the political agenda for some years, rendering Belgium also a forerunner in this debate. SIA was explicitly mentioned for the first time in the Federal Coalition Agreement of 1999. The development of a SIA methodology has also been extensively referred to in the first Federal Plan on Sustainable Development (2000 – 2004), including an action plan with strategic objectives for introducing SIA and the measures needed for its implementation. The second Federal Plan on Sustainable Development has rephrased this issue and the need for a SIA-practice has been repeated in the Federal Coalition Agreement of July 2003. The Royal Decree of 22 September 2004 creating Cells for Sustainable Development in all federal administrations, is the most concrete document showing the political willingness to introduce some form of Sustainability Impact Assessment, since one of the tasks of the Cells is the execution and/or coordination of SIAs.

However, while these building blocks exist for SIA, it is equally true that the *general* policy context at federal level is not in all aspects favourable for SIA. Notwithstanding the existence of an elaborated institutional framework for sustainable development policy in which vertical and horizontal integration is aimed at, it remains far from mainstream to take sustainability issues into account in other federal policy fields. Sustainable development policy represents in fact a minor 'branch' within the general policy context, largely unconnected to other policy fields. Besides, what is true for most modern states is also true for the Belgian federal level: policy-making structures are developed along the lines of policy domains and function largely

independent from each other. Horizontal integration of policies is the exception rather than the rule. Also vertical integration with other levels of competence (local, regional, federal, European, international) is often lacking. An additional problem is the fact that systematic and recurrent evaluations of policies and in particular *ex ante* evaluation practices such as SIA, are lacking in the current policy-making procedures. The limited experience which exists does not follow a strict methodological framework, nor can it rely on a formal evaluation process.

In general, the federal policy preparation process is characterised by complexity and lack of clarity, notwithstanding the intentions of the Copernicus Reforms. It is impossible to draw up a clear flow chart of policy making, since policy preparation is mainly managed by pragmatism. This clearly hinders the need for openness and the willingness to formulate, compare and weigh policy alternatives during policy preparation, which are essential in an SIA process. While stakeholder involvement, in particular for the traditional social partners (employers, trade unions), is not unusual at federal level, involvement of other actors during policy preparation, as well as generating the necessary transparency about the results of consultations, is not the rule.

To summarise, it seems as if in many ways SIA implies a rupture with the customary way of policy formulation at federal level. However, moving towards sustainability is often interpreted as a learning-process. Taking account of the different institutions that have been created for the development and coordination of federal sustainable development policies, SIA can thus also be interpreted as a next complementary step in this process. Albeit a step that is not unproblematic and that will demand a lot of new capacity building, sufficient resources, suited institutions and a clear will to orient policies towards integration and sustainable development.

The research project identified and extensively discussed several of the main questions which need to find an answer before SIA can become operational at Belgian federal level. The most important questions are:

- How to select policy proposals to be subjected to SIA and who should be commissioned to do so? Points to be solved include the use of a screening

instrument, the degree of transparency of the selection procedure, and the role of the Cells and the Council of Ministers.

- Who does what in executing SIA? Points to be solved include whether execution will be kept internal to the administration or whether it will be outsourced, which expertise building is necessary and which form of coordination.
- How to interpret the public nature of SIA? Points to be solved include how participation will be organized at the meta-level (determination of institutional conditions and procedures for SIA) and at the process level (the execution of SIA in its different stages).
- How will the quality of SIA be ensured? Points to be solved include the resources needed for capacity building, quality control of evaluations performed and the openness and controllability of results.
- Which relation between SIA and other evaluation initiatives? Points to be solved include the role of SIA versus other methodologies, and the role of SIA at federal level versus other policy levels.
- How will SIA be phased in? Points to be solved include which general direction SIA should take (see also paragraph 4) and whether a trial period shall be introduced.

### 3.2. *The problem of participation*

Contrary to the theoretical importance attached to participation in SIA processes (and in sustainable development in general), most existing frameworks for integrated impact assessments lack a clearly defined framework for involving stakeholders or the public. General guidelines and options for participation methods are often mentioned, but the decisions on the actual implementation of participation and the modalities of the participation procedure are left to the initiators of the assessment process. Existing practices show that participation is often restricted to informing and controlled consultation. A further elaborated participation process can have significant benefits, but also involves costs from the side of the initiator as well as from the side of participants. Therefore, a further elaborated participation process should only be initiated when taken seriously, with the decision-maker being prepared to involve the stakeholders in the decision-making process

and take their remarks into account. This requires the engagement of sufficient resources and institutional capital.

When analysing the SIA process from a participatory perspective, a distinction can be made between the meta level and the process level of SIA. The meta-level includes deciding on a scenario for SIA (see also paragraph 4), formulating procedures, determining capacity and supporting material needed and once SIA is established, evaluating the SIA process and results at regular intervals. Stakeholder participation at this level is important, because the what, how and why of a federal SIA-process are crucial for its credibility, and stakeholder agreement over – or at least knowledge of – these fundamentals will further the assimilation of SIA.

At the process level, participation issues will have to be considered for each step of SIA (screening, scoping, impact analysis, impact evaluation, reporting). The form and the extent of participation will partly be determined by the kind SIA scenario which is preferred (see 4), partly it will have to be determined on a case by case basis.

The final report discusses several proposals for participation during the meta level and process stage.

## 4. **Introducing SIA at Belgian federal level**

While an important part of the research was dedicated to analysing the different building blocks which make up SIA (methodology, institutional aspects, participation ...), part of the research effort also went into developing and discussing scenarios and procedures for introducing SIA at federal level.

### 4.1. *Scenarios for SIA at Belgian federal level*

In line with the observation that choosing an SIA scheme is a matter of interpreting which objectives SIA should pursue – from a more process-oriented to a more substantive form of SIA – it becomes possible to construct a range of different schemes for SIA. The research team defined five potential forms of SIA in terms of their *principal maximisation objective*, i.e. in terms of the most important objective to achieve with the specific form of SIA.

The first scenario is a *Maximisation of Transparency* scenario. Here, SIA is interpreted as an open-ended process, implying the consultation of multiple stakeholders (and citizens) on the policy orientations to pursue. It is the most discursive form of SIA, based on the principles of deliberative democracy and calling for a full-scale participation to the different phases of the decision-making process, including the policy formulation process. Tools to be deployed include citizens' juries, participative cognitive mappings etcetera.

A second scenario is called *Maximisation of Institutional Integration*. This SIA scheme puts emphasis on the integrative (horizontal and vertical) character of SD, by largely favouring inter-departmental and inter-institutional collaborations. The aim is to achieve in the mid-term an integration of SD-perspectives into everyday policy-making processes, much the same as is currently pursued in many countries with 'environmental policy integration'. Mostly internal to administration and stressing interaction with and between different institutions (e.g. Parliament, Federal SD Council, ICSD...), the SIA-scheme will be kept sufficiently transparent as to allow a soft form of control of the administrations by stakeholders. Mechanisms to be installed include network facilitation, informal collaborations, ...

The third scenario is a *Maximisation of Adaptability* scenario. Under this scenario, SIA is an entirely flexible mechanism, where each evaluation exercise is adapted by a central controlling process (or unit) according to the challenges, threads, opportunities raised by each specific policy proposal. It meanders on a case-by-case basis between, for instance, a stakeholder-participation process or a closed expert-driven cost-benefit study. Representing a perfectly procedural SIA, it limits itself to a series of meta-procedures on issues such as: who and how to decide on the individual form which SIA takes in front of a specific policy decision.

The fourth scenario is labelled *Maximisation of Impact Objectivation*. Here, SIA is a tool which allows to compare in an objectified manner a series of policy alternatives, predict their positive and negative impacts, foresee their indirect and multi-dimensional impacts, test a series of mitigation measures. The limited openness of the

evaluation process is used to gather non-technical knowledge and source-knowledge from different stakeholders, and to inform the interpretation of evaluation results. Tools rely mostly on modelling and expert-knowledge becomes of crucial importance.

The fifth scenario is a *Maximisation of Regulatory Performance* scenario, where SIA is largely an administrative and internal exercise. The aim is to enhance the performance of regulation by insuring the best possible 'return' on public decisions, as well as the highest possible degree of coherence between policies and policy levels, while minimizing negative, unwanted impacts. In the age of scarce public budgets, keywords include efficiency, effectiveness and productivity. Tools to be used are enhanced cost-benefit and cost-effectiveness analyses.

While all 5 SIA-scenarios presented are desirable in terms of SIA-principles, not all of them are plausible given the constraints and configuration of policy-making at the federal level. In effect, two of the presented scenarios ("Transparency" and "Regulatory Performance") would hurt either given conventions, or would pose serious challenge to public authorities' traditions in decision-making, or would not correspond to the authorities current interpretation of SIA. Given the need to stick primarily to plausible scenarios, neither of these two scenarios has been further developed. All the same, but for a slightly different reason, was the "Adaptability" scenario excluded from an in-depth analysis. Maximizing "Adaptability" of each SIA-process to the policy proposal's specificities would necessitate for public authorities to have already a serious experience with SIA, notably in order to be able to decide on a case-by-case basis which form of SIA is best.

Consequently, two scenarios were developed in detail, i.e. the Institutional Integration Scenario and the Impact Objectivation Scenario. They were also scored regarding their "performance" in terms of credibility (perception of the actors – civil servants, stakeholders, civil society, politicians – of the overall potential of the SIA-scheme to achieve a sufficient level of technical and scientific quality), salience (the degree of relevance the different actors attach to the SIA), legitimacy (the perceived potential of fairness of the evaluation process) and

efficiency (the potential of the SIA-scheme to render useable evaluation results within a given resource framework). The scores are summarized in table 2 and 3 below.

#### *4.2. Proposing an institutional approach for SIA at Belgian federal level*

While the scenarios above could be labelled “end scenarios” in the sense that they define what SIA should finally look like, the research team also developed several (simplified) procedures or flow charts of how SIA can be introduced and executed. These are included in the final report, but are tentative in the sense that they depend on several institutional decisions which still have to be taken (see also 3.1.).

Again, a distinction is made between the meta-level and the process level. The meta-level concerns the introduction of SIA as a new procedure in the federal decision-making process. Meta-level decisions include the overall orientation of SIA, determining its different components and the responsibilities of different actors and institutions, formulating procedures and criteria for evaluation. A possible procedure here is the elaboration of a draft proposal (e.g. by an interdepartmental working group or at cabinet level), which then follows a process of political approval and preferably also approval in a participatory process with consultation of stakeholders.

The process level concerns the execution of concrete SIA. A first procedure which has to be developed is the screening procedure, an essential step to identify policy proposals that have to be subjected to SIA. Policy proposals developed at the level of Ministerial Cabinets and at administrative level can be screened using a prescriptive filter and an impact matrix. Different actors might be involved, such as the departmental Cells for Sustainable Development, members of the ministerial cabinet in charge of the proposal, civil servants charged with the proposal, a central support unit. It will have to be decided how interested stakeholders and public can follow the procedure (e.g. through an SIA website that gives an overview of initial policy proposals and selected ones).

A second procedure at process level is needed to clarify what happens once a policy proposal is selected for undergoing SIA. The research team developed tentative proposals

for the scoping and impact assessment phase of SIA for the Institutional Integration Scenario and the Impact Objectivation Scenario (see also 4.1.). While in the Institutional Scenario, the concrete SIAs are initiated at departmental level, in the Objectivation Scenario, these are initiated by a centrally created expert group. Involvement of departments, experts and stakeholders differ across scenarios, but in both cases, the development of an SIA website is deemed a suitable vehicle for transparency.

#### *4.3. Proposing an integrative methodological framework for SIA at Belgian federal level*

The research into methodologies for SIA during the project taught that numerous methodologies exist for impact prediction and impact evaluation (see also paragraph 2 above). As a general model for analysing federal policy proposals and describing their impacts, the research team introduced an Actions-Consequences-Objectives framework.

In first instance, the ACO model is meant as a description of the policy, as objective and neutral as possible. As such, it still goes further than most policy formulations insofar that it makes explicit the underlying logic of action, the assumptions concerning the causal links between the planned actions and measures, the expected changes in the state of the targets systems (i.e. consequences) and the subsequent achievement of its objectives.

Secondly, the ACO model can be used to assess the policy proposal not only on its own merits, but also in terms of sustainable development objectives. Consequences can for example be classified as economic, environmental or social. Furthermore, the objectives of the policy proposal can be tested on their consistency with commitments already taken, e.g. in the first and second Federal Plan for Sustainable Development.

Through these characteristics, the ACO framework can be used as a guiding tool when executing the first SIAs at federal level. The framework integrates in the same visual frame social, environmental and economic consequences (effects and impacts) of policies; checks for consistency of these consequences with higher-levels objectives or commitments on sustainable development; makes apparent the uncertainties surrounding some relations between actions and consequences, and consequences and objectives; helps in

identifying unwanted impacts and possible mitigating actions in order to control them; and compares alternative policies with respect to a common set of overarching objectives.

## **5. Future research and study questions**

This 18-month research project was meant as an exploratory research project, touching upon many research issues raised within the field of “Science for Sustainable Development”. Projects working on the operationalisation of sustainable development evaluation mechanisms, and in a wider sense of decision-aiding tools, inherit a considerable amount of research questions from the upstream research fields, ranging from the handling of multi-scale uncertainties to the efficiency of reflexive governance as a general blueprint for public management. Research questions which merit further exploration include the conception of sustainable development and sustainable development criteria underlying SIA processes, the methodologies and tools useful for policy support through SIA, the realisation of participation in SIA processes, the links between *ex ante* and *ex post* evaluations, the link between *ex ante* evaluation and the use of indicators as tools for decision-making.

For (immediate) implementation of SIA at Belgian federal level, more concrete and operational questions are still open. These

include the question of conducting a series of “real-time” case studies, with active support and a mandate from policy-makers, in order to shed more light on procedural, methodological and institutional questions. These also include organisational matters needed to support the development of SIA, e.g. development of handbooks, training courses, internal and external websites. More essentially, choices have to be made as to the fundamental orientation public authorities want to attribute to SIA at federal level (see the scenarios under 4.). These choices (partially) determine choices in screening and scoping, participation and transparency, inter-institutional and intra-institutional organisation, and methodological requirements such as centralisation of data processes, development of frameworks to assess consistency of policies and the operationalisation of impact evaluation instruments (e.g. the ACO framework). The extent and nature of these kind of questions (methodological, procedural, organisational) is such that they call for the implementation of a study programme (i.e. a pool of financial means to be invested in the development of the needed expertise). The implementation of such an accompanying research programmes has been identified in other contexts as being crucial during the initial implementation of SIA (e.g. at EU-level).

<b>Scenario 1 : Maximization of Institutional Integration</b>		
<i>Credibility</i> (perceived technical, scientific quality)	-/+	Low in the beginning (considering the state of existing SD-evaluation culture), but steadily raising with gained experience.
<i>Saliency</i> (perceived relevance of the assessment)	+	Potentially high, but restricted to internal integration and promotion of SD into policy-making
<i>Legitimacy</i> (perceived fairness of the evaluation)	-	Potentially low, as SIA will be perceived essentially as an internal mechanism. Stakeholders might accuse SIA to pursue mainly a goal of <i>ad hoc</i> legitimization of already appointed policy choices. Hence, strong pressure to develop active communication and transparency, as well as participation on the level of screening and/or scoping.
<i>Efficiency</i>	++	Potentially very high. Costly and time-consuming external participation is restricted to the minimum. In the beginning however, the needed external expertise might use considerable financial and coordination resources.

Table 2. Scores of the Institutional Integration Scenario on different criteria

<b>Scenario 2 : Maximization of “Impact Objectivation”</b>		
<i>Credibility</i> (perceived technical, scientific quality)	++	Potentially very high. Careful consideration should be given to the inherent difficulties, which are raised if SD is used as the evaluative referent. Credibility might suffer a lot if the impact objectivation is pushed beyond the limits of what is deemed acceptable with SD-evaluations (e.g. monetizing non-marketable goods and services).
<i>Saliency</i> (perceived relevance of the assessment)	?	Potential polarization. Depending on the perspective of the observer. For some stakeholders and actors, SD calls also for a revolution of evaluation methodologies, not only for the improvement of existing ones.
<i>Legitimacy</i> (perceived fairness of the evaluation)	?	Potential polarization. Depending on the perspective of the observer. The strong technicality and complexity of the evaluation will not necessarily be accessible to many stakeholders.
<i>Efficiency</i>	--/+	In the beginning very low, notably because of the necessary resources to finance the improvement of impact prediction and -evaluation tools. However, in the mid-term, the fine-tuning of regulation and the mitigation of negative, unwanted effects of policy proposals will help to render regulation much more efficient, hence saving public investments, hence allowing a positive return on initial R&D investments.

Table 3. Scores of the Impact Objectivation Scenario on different criteria