

Evaluating the European Environment Agency

Feedback from the Rethink Plastic Alliance to the evaluation of the European Environment Agency (EEA), with a focus on data relevant to tackling plastic pollution.

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About Rethink Plastic

The Rethink Plastic Alliance is a coalition of leading European NGOs advocating for ambitious EU policies to tackle the growing crisis of plastic pollution. It brings together the Center for International Environmental Law (CIEL), ClientEarth, the Environmental Investigation Agency (EIA), the European Environment Bureau (EEB), the European Environmental Citizen's Organisation for Standardisation (ECOS), Greenpeace, Seas At Risk, Surfrider Foundation Europe, and Zero Waste Europe. Together, these organisations represent thousands of active groups, supporters and citizens in every EU member State working towards a future free from plastic pollution.

Table of Contents

Summary.....	2
EEA's role in monitoring waste shipments and environmental impacts.....	3
• Independent analysis of waste shipment data.....	3
• Resourcing to evaluate increased waste shipment data.....	3
• Supporting the future evaluation of the WSR.....	4
EEA's role in monitoring packaging reuse and showcasing successes.....	4
• Independent collection of national data.....	4
• Showcasing success stories on packaging reuse.....	5
EEA's role in monitoring Member States' progress towards EU zero-pollution targets.....	5
• Key role of the Zero Pollution Monitoring and Outlook assessment.....	5
• Citizen science data: Marine LitterWatch.....	6

Summary

Strong and independent environmental assessment is essential to uphold transparent, democratic and evidence-based policymaking, particularly where implementation and regulatory changes are subject to competing political and industry interests.

EEA strategy over the next five years should not only focus on measuring Europe's environmental problems. The EEA should play a strong role in independently assessing whether major environmental legislation adopted as part of the European Green Deal is delivering its intended environmental outcomes as it moves through implementation, including the impact of subsequent omnibus and simplification packages on those outcomes. In this feedback, the Rethink Plastic Alliance outlines areas where independent EEA analysis could provide significant EU added value.

Ensuring that the EEA can fulfil this role requires an assessment of whether its resources and analytical capacity have kept pace with its expanding responsibilities. Efficiency should not be conflated with reducing analytical capacity. The EEA's responsibilities have expanded significantly as new environmental legislation has been adopted, including new monitoring functions under legislation such as the revised Waste Shipment Regulation. The evaluation should therefore assess whether sufficient capacity exists to undertake these new functions and independently assess the environmental outcomes of EU legislation as it moves through implementation.

Waste shipments provide a particularly clear example of the EEA's EU added value. Cross-border movements of waste and their environmental impacts cannot be fully understood through national data and assessments in isolation. The EEA is well placed to bring together information across Member States, identify EU-wide and extra-EU shipment trends, and provide independent analysis of whether implementation is contributing to the EU's waste and circular economy objectives. Similarly, the EEA will play a key role with the coordination of the European Reuse Observatory for Packaging, in support of the Packaging and Packaging Waste Regulation (PPWR) implementation.

Finally, the evaluation should recognise the EEA's key role in monitoring progress towards the Zero Pollution Action Plan targets and in providing robust evidence to inform policy development and implementation. It should also recognise the valuable contribution of citizen science initiatives such as Marine LitterWatch, both as a complement to official environmental monitoring and as a means of strengthening public awareness and engagement.

EEA's role in monitoring waste shipments and environmental impacts

Independent analysis of waste shipment data

The EEA has an important role in providing independent analysis of waste shipments and their environmental impacts, including assessing whether EU waste and circular economy policies are achieving their intended environmental outcomes. The EEA has already demonstrated the value of this work. The following are some examples of these assessments:

- Linking cross-border shipments of waste in the EU with the circular economy ([see here](#));
- Managing non-packaging plastics in European waste streams – the missing part of the plastic puzzle ([see here](#));
- Zero Pollution Monitoring Assessment – Waste signals ([see here](#));
- EU exports of used textiles in Europe's circular economy ([see here](#));
- The fate of EU plastic waste – European Topic Centre on Circular Economy and Resource Use (ETC/CE) ([see here](#));
- Management of used and waste textiles in Europe's circular economy ([see here](#));
- The role of plastics in Europe's circular economy ([see here](#));
- Circularity of the EU textiles value chain in numbers ([see here](#));

The EEA has already contributed analysis relevant to the development of EU waste shipment policy. The revised WSR provides an opportunity to strengthen this work. Article 73 explicitly provides that the EEA shall support the Commission in monitoring implementation of the Regulation, including, where appropriate, by producing reports analysing shipments of specific waste streams and their environmental impacts.

Resourcing to evaluate increased waste shipment data

The WSR's DIWASS provides the EEA with an opportunity to make use of improved shipment information to analyse trends, destinations, treatment routes and environmental impacts and to assess whether implementation of EU waste shipment policy is achieving its intended objectives. New WSR requirements for the publication of information on waste shipments provides an important opportunity to improve public understanding and independent scrutiny of waste movements and their environmental impacts, but the EEA requires sufficient resourcing to undertake such an endeavour.

Concurrently, the EEA should also assess the quality, completeness and usefulness of the information available for environmental monitoring. Where limitations in the granularity, completeness or accessibility of shipment information, including information withheld on confidentiality grounds, prevent effective assessment of waste movements or their environmental impacts, these limitations should be identified and reported.

Supporting the future evaluation of the WSR

The Regulation requires the Commission to assess whether publication of waste shipment information provides adequate transparency and specifically to examine whether and why destination facility names have been treated as confidential. The Commission is also required to take into account reports produced under Article 73. Analysis of the new shipment data would allow the EEA to demonstrate where access to detailed information supports effective environmental monitoring and, equally, where missing or withheld information prevents meaningful assessment of where waste is ultimately treated or its environmental impacts. This evidence should inform the Commission's future assessment of the WSR's transparency provisions.

The EEA has already demonstrated its added value in this area, including through analysis produced specifically to support the previous WSR review. The revised WSR now provides both a stronger legal mandate and improved data for the EEA to continue this work.

Recommendations:

- The evaluation recognises independent analysis of waste shipments and their environmental impacts as an important area of EU added value provided by the EEA.
- The EEA is adequately resourced to systematically analyse waste shipment information generated under the revised WSR, including trends in specific waste streams, destinations, treatment routes and environmental impacts.
- The EEA regularly assesses whether the quality, granularity, completeness and accessibility of WSR data are sufficient to effectively monitor waste shipments and identifies where information gaps or confidentiality restrictions prevent effective environmental monitoring.
- The EEA uses this analysis to demonstrate the public and environmental value of transparent waste shipment information and provide an independent evidence base for the Commission's future assessment of the WSR's transparency provisions.

EEA's role in monitoring packaging reuse and showcasing successes

Independent collection of national data

The EEA will play an essential role in collecting Member States' data on packaging reuse under the PPWR, in collaboration with leading experts across Europe. It will integrate different data streams from the early warning system and analyse them to support the assessment of the EU reusable packaging targets and track progress. This knowledge hub is important to support scaling up packaging reuse, in line with the PPWR ambition.

Showcasing success stories on packaging reuse

With the European Reuse Observatory on Packaging Reuse, the EEA will play a pivotal role in highlighting successful and innovative packaging reuse systems across Europe, exchanging knowledge and fostering peer collaboration through a community of national practitioners. This will help identify best practices for packaging reuse and inspire wider uptake.

Recommendations:

- The EEA ensures Civil Society participation in the Reuse Observatory.
- The EEA uses the Reuse Observatory to provide an independent evidence base for the Commission's future assessment of the PPWR's reuse provisions, including on interoperability of reuse systems across Member States.
- The EEA regularly assesses whether the quality, granularity, completeness and accessibility of packaging reuse data are sufficient to effectively monitor waste reduction and identifies where information gaps or confidentiality restrictions prevent effective environmental monitoring.

EEA's role in monitoring Member States' progress towards EU zero-pollution targets

Key role of the Zero Pollution Monitoring and Outlook assessment

Published jointly by the EEA and the European Commission's Joint Research Centre (JRC), the Zero Pollution Monitoring and Outlook assessment provides a regular assessment of progress towards the EU's zero-pollution targets. It brings together available EU-level data, including data reported by Member States, to assess current pollution trends and the likelihood of achieving the 2030 targets. The assessment therefore provides an important evidence base for identifying areas where further action may be needed and for informing the development and implementation of EU policies. The [latest assessment](#) shows that levels of microplastic pollution in the EU are increasing, highlighting the need for further action, both through strengthened policy measures and their effective implementation.

This EU-level monitoring is complemented by Member State reporting under specific pieces of environmental legislation, which provides more detailed and policy-specific information. Reporting under the Single-Use Plastics Directive (SUPD) contributes to the evidence base on the implementation and effectiveness of measures addressing single-use plastic pollution.

Citizen science data: Marine LitterWatch

The EEA also plays an important role in making citizen-generated environmental data available through its Marine LitterWatch (MLW) initiative. Launched in 2013, MLW is a citizen science initiative through which citizens, NGOs, schools, scientists and other communities collect and report structured data on beach litter across Europe and neighbouring countries. Using a harmonised methodology, the data contribute to the European knowledge base on marine litter and can support the monitoring of policy implementation and progress towards reducing pollution at source.

Beyond its contribution to environmental monitoring, MLW also has an important awareness-raising and educational dimension. By making the data collected by citizens part of a broader European dataset, the initiative allows participants to see how their local efforts contribute to a wider understanding of marine litter across Europe. This can help strengthen citizens' understanding of the scale and sources of marine litter, while providing a tangible link between local citizen engagement, environmental monitoring and European-level action.

Recommendations:

- The EEA's key role in providing robust, comparable and independent evidence to monitor progress towards EU environmental objectives is recognised and maintained.
- EEA monitoring and assessments effectively inform both the development of new policies and the implementation of existing measures.
- The evaluation recognises citizen science as a valuable complement to official environmental monitoring and reporting.
- The EEA continues to support initiatives such as Marine LitterWatch and ensure that citizen-generated data can contribute to EU-level environmental monitoring, while also strengthening public awareness and engagement.