



Evaluating an advocacy agenda for a circular EU economy

Learning about Initiative Progress and Initiative Quality

September 2022

Contents

Executive Summary	5
Table 1 Summary of Rubric Rating	6
Section 1: Introduction and Methodology	10
1.1 Introduction	11
Figure 1 A timeline for the Advocacy Initiative grant, highlighting when this evaluation happened	12
1.2 Evaluation methodology	13
Figure 2 The evaluation’s sensemaking process	15
Section 2: Evidence on Initiative Progress	16
2.1 Sustainable Products and Materials Policy	17
2.1.1 Summary of progress	17
2.1.2 Distance travelled	17
Table 3 Key achievements and evidence of contribution for Sustainable Products and Materials Policy	18
2.1.3 System response	19
Table 4 Signals of resistance and change for Sustainable Products and Materials Policy	19
2.1.4 Rubrics assessment	21
Table 5 Rubrics assessment for Sustainable Products and Materials Policy	21
2.1.5 Future opportunities	21
2.2 Fiscal and economic instruments	22
2.2.1 Summary of progress	22
2.2.2 Distance travelled	22
Table 6 Key achievements and evidence of contribution for Fiscal and Economic instruments	23
2.2.3 System response	24
Table 7 Signals of resistance and change for Fiscal and Economics Instruments	24
Table 8 Rubrics assessment for Fiscal and Economic Instruments	26
2.2.5 Future opportunities	26
2.3 New consumption narratives	27
2.3.1 Summary of progress	27
2.3.2 Distance travelled	27
Table 9 Key achievements and evidence of contribution for New Consumption Narratives	29
3.3 System response	31
Table 10 Signals of resistance and change for New Consumption Narratives	32
2.3.4 Rubrics assessment	33
Table 11 Rubrics assessment for New Consumption Narratives	33
2.3.5 Future opportunities	33

2.4 Influencing EU Trade	34
2.4.1 Summary of progress	34
2.4.2 Distance travelled	34
Table 12 Key achievements and evidence of contribution for Influencing EU Trade	35
2.4.3 System response	35
Table 13 Signals of resistance and change for Influencing EU Trade	36
2.4.4 Rubrics assessment	36
Table 14 Rubrics assessment for Influencing EU Trade	37
2.4.5 Future opportunities	37
2.5 Reinforced Network	38
2.5.1 Summary of progress	38
Table 15 Key achievements and evidence of contribution to Reinforced Network	39
2.5.3 System response	40
Table 16 Signals of resistance and change for Reinforced Network	41
2.5.4 Rubrics assessment	41
Table 17 Rubrics assessment for Reinforced Network	41
2.5.5 Future opportunities	41
Section 3: Evidencing Initiative Quality	43
3.1 Design	43
3.1.1 Summary	44
Table 18 Rubric assessment for the Advocacy Initiative Design	44
3.1.2 Coherence of the Initiative Design	44
3.1.3 A blend of intensity and consistency to achieve intended impact	45
3.1.5 Strength of partner selection and diversity	46
3.2 Implementation	46
3.2.1 Summary	47
Table 19 Rubric assessment for Implementation	47
3.2.2 Focus and clarity of implementation path	47
3.2.3 Agility and responsiveness to opportunities	48
3.2.4 Feasibility of real-world tactics used	48
3.2.5 Capacity building of partners and individuals, including marginalised	49
3.3 Monitoring and adaptation	51
3.3.1 Summary	51
Table 20 Rubric assessment for monitoring and adaptation	51
3.3.3 Use of evidence for decision-making	51
3.3.4 Integration of contextual changes into decision-making	52
3.3.5 Quality of sensemaking practice	52
3.4 Communication and Learning	52
3.4.1 Summary	54

Table 21 Rubric assessment for communication and learning	54
3.4.2 Credibility of EEB as a campaign leader amongst key audiences	54
3.4.3 Well-aligned external messaging	54
3.4.4 Relevant audiences being encouraged to reflect on the solution and their role in supporting it	55
3.5 Organisation and network capacity	56
3.5.1 Summary	57
Table 22 Rubric assessment for organisation and network capacity	57
3.5.2 Strong person-job fit	57
3.5.3 Financial stability	57
3.5.4 Fundraising capacity	58
3.5.5 Inclusive learning culture	58
Section 4: Insights and Learning	58
4. Insights from the Advocacy Initiative’s Learning Session	60
Table 23 Key themes, insight and future opportunities emerging in the Advocacy Initiative Learning Session	61
Section 5: Final reflections for field building	64
5.1 The value of consistency	64
5.2 The integrated nature of policy advances	64
5.3 Where to direct future energy	65
5.3.1 Fiscal incentives	65
5.3.2 Harmonisation	65
5.3.3 Inclusion	66
Annexes	66
Annexe 1 - The process of co-developing the evaluative frameworks	68
Integrated framework for evidencing Initiative Progress	68
Figure 3 The relationship between EEB Strategic Pillar Outcomes and Laudes rubrics B1, B5 and B6	68
Integrated framework for evidencing Initiative Quality	68
Annexe 2 - Progress Pillars Data Collection Framework	69
Annexe 3 - Quality Pillars Data Collection Framework	72
Annexe 4 - Co-developed Laudes Rubrics Baseline for EEB Circular Economy Advocacy Initiative	74
Annexe 5 - Progress ratings table	77
Table 24 Progress rating scale	78
Table 25 Progress rating scale for Sustainable Products and Materials Policy Indicators (B1)	78
Table 26 Progress rating scale for Fiscal and Economic Instruments (B5.1)	79
Table 27 Progress rating scale for New Consumption Narratives (B5.2)	79
Table 28 Progress rating scale for Influencing EU Trade (B5.3)	80
Table 29 Progress rating scale for Reinforced Network (B6)	80
Annexe 6 - Laudes Rubric Assessment for B Rubrics with Rationale	80

Table 30 Rubrics assessment for Sustainable Products and Materials Policy	81
Table 31 Rubrics assessment for Fiscal and Economic Instruments	81
Table 32 Rubrics assessment for New Consumption Narratives	81
Table 33 Rubrics assessment for Influencing EU Trade	82
Table 34 Rubrics assessment for Reinforced Network	82
Annexe 7 - Insights and Learning	83
Figure 4 Post-it notes that capture the insights and learning from the final sensemaking session to look to the future	84
Annexe 8 - Stakeholders interviews	84
Annexe 9 - Documents Reviewed	86
Annexe 10 - Advocacy design and implementation references	91
Annexe 11 - Methodology	92
Table 35 The five Progress Pillars and five Quality Pillars of the evaluation design	93
Figure 5 Diagram representing the evaluation process and the stakeholders involved	94
Table 36 Key evaluation questions	94
Table 37 Evidence Analysis	94
Figure 6 The Laudes 5 point rating scale, used for all rubrics - A and B	95

Executive Summary

Advocacy work on the circular economy takes persistence and responsiveness. Policies generally move through the EU Commission, the EU Parliament and the EU Council, with each transition creating opportunities for delays to happen and gains to be won or lost. To create and sustain progress, the team has to advocate:

- **pre-EU Commission proposal phase**, working on preparatory steps, directions to improve, and first stakeholders consultations. Often this phase involves anticipating proposals and influencing decisions ahead of time.
- **policy development phase**, working to inform discussion of text by EU institutions to secure advances, increase ambition and sustain momentum.
- **implementation and evaluation phase**, working on post-adoption in the EU Official Journal through transposition, application and monitoring to critique, plug gaps and shape implementation...until the next review cycle.

Even where civil society does advance policy on circularity, it is difficult ahead of time to anticipate how the system will respond. Resistance in the form of disengagement, implementation delays, push-back, counter-lobbying, co-option of narrative and green washing is common.

Pausing to reflect on the progress that has been made by the Advocacy Initiative in the two years between 2020-2022, this evaluation has sought to combine examination of policy changes alongside assessment of change in the wider system.

Statement of Overall Progress

The Advocacy Initiative has been effective at advocating for policy reform in textiles and built environment sectors over the two year grant period, despite significant delays, resistance and counter lobbying.

The last six months have brought about significant policy shifts which are pushing an interest in circularity up the agenda. Some of this attention is positive, reflecting a change in mindsets and priorities; some is regressive because it seeks to sustain “business-as-usual” for as long as is possible.

If the Advocacy Initiative is to make effective use of the momentum it has contributed to, it needs to support a wider variety of organisations within member states to enact, enforce and refine hard-won policy gains.

Table 1 Summary of Rubric Rating

Rubric						
		Harmful	Unconductive	Partly Conductive	Conducive/Supportive	Thrivable
Initiative Progress (Early and Later Changes)						
B1	Stakeholder-informed policy - Sustainable Product and materials					
B5	Exposing and thwarting harm - Fiscal and economic instruments - New Consumption Narratives - Influencing EU trade					
B6	Multi-stakeholder movements pressure - Reinforced network					
Initiative Quality (Process)						
A1	Design					
A2	Implementation					
A3	Monitoring and Adaptation					
A4	Communication and Learning					
A5	Organisation and Network					

Summary of Initiative Progress (B rubrics)

The B1 Rubric on Stakeholder-informed policies has moved from Unconductive to Partly Conductive and continues to track in the right direction. Ecodesign policy and the EU Textile Strategy have both been recognised by external stakeholders as key achievements, with ramifications in the private sector as business organises around the new policy frameworks. For example, business was struck by the robust nature of the EU Textiles Strategy, with circularity increasing on CEO agendas and business supported higher usage of secondary materials in new buildings in line with the EU Circular Economy Action Plan following direct intervention by EEB.

Overall, the B5 rubric on Exposing and thwarting harm has progressed from Harmful to Unconductive based on a synthesis assessment of key work areas and systems signals. The Advocacy Initiative uses three of its strategic pillars to expose and thwart harm: fiscal and economic instruments, new consumption narratives and influencing EU trade. Within each of these

strategic pillars, the output and outcome areas where the Initiative had been most active were selected for evidence generation.

Fiscal and Economic Instruments - The evaluation is able to evidence how the Advocacy Initiative has contributed to progressing fiscal and economic incentives through the Textile Strategy and Taxonomy. While the fiscal landscape is moving in the right direction following advocacy on Extender Producer Responsibility for textile and construction products as well as the taxonomy definitions for building materials, it remains a long way off a fiscal architecture that promotes circularity. The combination of fiscal penalties and rewards have not reached a tipping point where it no longer makes economic sense to persist with 'business-as-usual'. This means that companies will not transform quick enough to meet decarbonisation targets.

New Consumption Narratives - It was clear from the data collected that the Advocacy Initiative has become more skilful in the use of narrative – both to anchor specific policy work on the circular economy and to place issues on the policy agenda. Signals for change include a maturation in the use of new consumption narratives, like the Wellbeing Economy, which open new doors for policy discussion. As a team which understands the big picture and the technicalities of the EU legislative process, the Initiative team plays an important translation role, and their contribution to shifting the circular economy narrative is evident at the EU level. However, the evaluation is not able to evidence that industry is moving away from an economic growth model.

Influencing EU Trade - The Initiative team and its partners have had some success in exposing harmful practices and in paving the way for holding others to account. But further efforts are needed both to hold the line on policy gains and to anticipate counter-lobbying in due diligence, Waste Shipment Regulation and other emerging policies. The pivot away from influencing EU trade directly to tackling due diligence regulation and waste shipment regulation has also been effective, with interviewees reflecting that environmental due diligence, especially on climate, was almost impossible two years ago. The Initiative's work on waste shipment contributed to ambitious detail and an outright ban on all waste exports to non-OECD countries and stricter obligations to monitor shipments to OECD countries. However, it feels too early in the legislative process to celebrate. Both due diligence and waste shipment regulation have been subject to heavy lobbying, delays and push back from industry and nation states. This signals something about the "readiness" of the system to accept more regulation around the way business conducts itself. It also highlights an opportunity for greater civil society capacity building and campaigning to make regulations more politically palatable.

The B6 rubric on Multi-stakeholder movements remains Partly Conducive in line with the baseline. This is not to negate the great strides that have been made by the Advocacy Initiative to build and strengthen network linkages and capacity in the preceding two years, including two highly functional task forces for textiles and buildings. The relational landscape remains Partly Conducive in recognition a lot more work is required to upend current power relations and hegemony. The civil society power base could be bolstered through the inclusion of less represented voices in the Circular Economy ecosystem, including the recycling and repair sectors, the secondary use sectors, Small Medium Enterprises, trade unions, women's movements, youth organisations, and social development NGOs. Intersectionality is an important part of this inclusion landscape, with scope for policy recommendations to more systematically incorporate the perspectives of different income groups, races, genders and religions as well as consideration of local socio-economic disparities (e.g. fuel poverty within EU member states) and global socio-economic disparities (e.g., the livelihoods of people in emerging economies). Strategising about where to prioritise the reinforcement of networks is an important next step, especially given current team capacity and the time investment required for effective relational work.

Summary Initiative Quality (A rubrics)

The Advocacy Initiative team is highly adept at technical policy work and relationship building.

The Initiative's policy achievements flow directly from their ability to work with flair and grasp, both to think outside the box and follow through on the details. While the texts may not reflect all that EEB has requested during the policy process, the ability to trace how specific articles in policy texts echo the Advocacy Initiatives and illustrate the effectiveness of their collaborations, technical work and political persuasion.

The Advocacy Initiative team are highly effective networkers, who have the relational skills and capacities to create rewarding personal relationships, steward effective collaborations and lean into contentious issues with multi-stakeholder groups. They are considered "the go-to" organisation in Brussels for an open and diplomatic dialogue on Circular Economy policy.

A key challenge resides in the team's capacity to respond to all the opportunities on policies, including with campaigns like the Doughnut Economics campaign which generated support for more technical policy conversations. One of the most difficult arenas of Initiative design to navigate is policy delays - knowing how to pivot and effectively deploy resources through parallel campaigning and other tactics - without burning out. With a group of actors as conscientious as the Initiative team, it is important to reflect that advocacy work is a marathon, not a sprint. It requires stamina. In this context, self-care is a political act.

Over the course of the evaluation team's engagement with stakeholders, Sophoi were struck by how passionate people are - both with the work of EEB and its goals. A couple were specifically interested in being part of this Learning session. They can see the value of multi-stakeholder sensemaking, especially for movement building. By investing time appreciating the wins and losses together, sensemaking allows collectives to appreciate the individual experience and distribute responsibilities more efficiently, according to where strengths and strategic relationships are in the network.

Summary of Insights and Learning

During sensemaking, there was greatest resonance to prioritise work around **just transition, building out the network** and **measuring impact**. EEB, Laudes and Sophoi discussed the possibilities and challenges around integration of social-economic issues into a circular economy transition, including the reality of working in an interdisciplinary way when different groups have only a surface-level understanding of the issues they each advocate for.

The conversation on building out the network focused on identifying whose voices are missing from the policy making process. There was a lot of energy to work more directly with trade unions, SMEs, the repair and reuse community as well as with civil society groups within each member state. EEB recognised the opportunity to leverage Laudes ecosystem of funded partners to begin some of this work. Linked to the relational way that the Advocacy Initiative works to deliver policy advancements, there was an interest in finding ways to capture anecdotal evidence of change more systematically - a conversation, an email exchange, a change in frame or discourse - so as to plot progress temporally.

Sensemaking led to more clarity about how the Advocacy Initiative team should work with rubrics so assessments situate the Initiative's progress within a contextual analysis of the state of the wider system to understand their contribution.

Final reflections for field building

There is a lot for civil society to learn from the consistent and integrated way in which EEB approaches policy transformation. Orienting an entire EU legislative body towards new consumption and production patterns is ambitious, but this Advocacy Initiative is exemplary at creating momentum through incremental, and cumulative, policy change.

This work could be advanced with increasing focus on fiscal incentives, harmonisation and inclusion, all of which would support business to reimagine its purpose in society. To summarise, business in its current form requires financial incentives to act. It's also the case that there are many new and diverse economic forms which would better fit a circular economy, but which remain under-supported in current fiscal and economic frameworks.

In some arenas the Advocacy Initiative has been overpowered by the active push back from member states and industry, particularly on the socio-economics of a Just Transition. Given the global nature of supply chain systems, and the inherent inequities that have been designed into them, funding to diversify the civil society power base within and beyond actors in the EU has never been more urgent.

Section 1: Introduction and Methodology

1.1 Introduction

Circular economy overview

The circular economy is beginning to enter the mainstream and is increasingly understood as a concept within the EU Commission and the EU parliament. That said, it is a broad term, used with different meanings and co-opted for different purposes¹.

The circular economy that Laudes Foundation and EEB are seeking to transition to is one that is [inclusive and fair](#). It is one that asks countries and citizens within the EU to reflect on the harm they cause to people and the planet through high levels of resource use, consumption and waste. These behaviours have been designed into the everyday functioning of linear [supply chain systems](#), especially since the introduction of ‘value chains’ by Michael Porter in [1985](#), with environmental, social and economic consequences for most of the Earth’s inhabitants.

To shift to circularity a different set of policies and financial incentives are required, which embed production and consumption in the material reality of resource use and planetary boundaries. There is a need to integrate social considerations into technical discussions about how to make supply chains circular alongside the economic infrastructure to support market transition for all actors in formal and informal economies alike.

An Advocacy Agenda for a Circular EU economy

The European Environmental Bureau (EEB) consists of over 170 members from 36 countries working for a better future where people and nature thrive together. As part of its ambition to transition away from a resource intensive linear economy, EEB has designed an advocacy agenda for a circular EU economy. In 2020, the Laudes Foundation funded EEB to apply the advocacy agenda to the textile sector and built environment sectors.

The goals of the Laudes grant were to enable a systemic transformation of the EU economy able to progress Sustainable Development Goals (SDGs). In efforts to realise these goals EEB utilises a wide range of EU policy instruments to enable the circular economy transition, including product and material policy instruments, fiscal and economic instruments, waste and due diligence policy instruments, new consumption narratives and network building. As set out in EEB’s [Theory of Change](#), activities within these strategic work areas seek both to create immediate action and to prevent further harm.

The Advocacy Initiative is ambitious and unwavering, especially in its calls for EU policy that incentivises a *reduction* in how much is produced and consumed in the EU alongside designs for *sufficiency and circularity* to avoid the demand for energy, water, materials, land and other natural resources over the lifecycle of buildings and textiles.

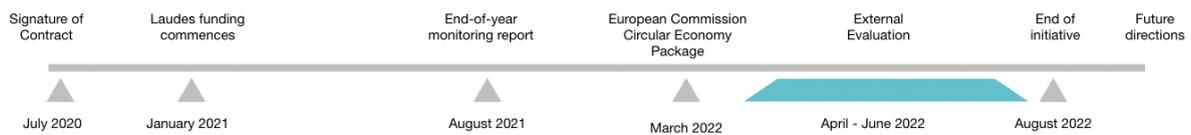
About this evaluation

In January 2022, the Laudes Foundation commissioned Sophoi to conduct an independent summative evaluation of the effectiveness of the “Delivering an advocacy agenda for a circular EU economy” Initiative (or the Advocacy Initiative) within textiles and built environment sectors.

The evaluation took place towards the end of the initial 2-year funding lifecycle as an opportunity to reflect and learn together about what’s working and why to inform future action (See Figure 1).

¹ Bauwens, Hekkert and Kirchherr (2020) Circular Futures: What Will They Look Like? Ecological Economics, 175. Retrieved from: <https://www.sciencedirect.com/science/article/pii/S092180091931972X>

Figure 1 A timeline for the Advocacy Initiative grant, highlighting when this evaluation happened



The evaluation combined appreciative interviews, document review and sensemaking with funders, implementers and independent evaluators to formulate an assessment of how the Advocacy Initiative is performing, how the system is responding and where energy is best deployed next.

About this report

The findings section of this report is structured in three parts. [The first part](#) presents the evidence Sophoi, the evaluation team, accumulated for each of **5 Progress Pillars**, which are the mechanisms by which the Advocacy Initiative seeks to enable the transition to a circular economy. They align with three of the Laudes B rubrics on Early and Later Changes: B1 Stakeholder-informed policies, B5 Exposing and thwarting harm, B6 Multi-stakeholder movements pressure.

- Sustainable Products and Material Policy (B1 Stakeholder-informed policies)
- Fiscal and Economic Instruments (B5 Exposing and thwarting harm)
- New Consumption Narratives (B5 Exposing and thwarting harm)
- Influencing EU Trade (B5 Exposing and thwarting harm)
- Reinforced Network (B6 Multi-stakeholder movements pressure)

The evidence Sophoi collected against each Progress Pillar informs Sophoi's observations and discussions on **distance travelled, systems response, a rubrics rating and future opportunities**.

[Section 2](#) of the report explores what Sophoi learned about Initiative Quality. It presents the evidence Sophoi collected across **5 Quality Pillars**, which were informed by Laudes A rubrics and best practice in advocacy. Sophoi's observations and discussion inform a **rubrics rating** for design, implementation, monitoring and adaptation, communication and learning, organisation and network capacity.

[Section 3](#) of the report summarises the discussions between EEB, Laudes and Sophoi in the final phase of Sophoi's Learning session. Sophoi report back on several insights alongside the opportunities Sophoi, EEB, and Laudes discussed for future action. EEB intend to use the learning to inform future priorities on:

- A Just Transition
- Building out the network
- Measuring their impact

Some of the reflections will be relevant to other funders and implementers keen to strengthen the ecosystem of actors advocating for a transformative circular economy.

1.2 Evaluation methodology

Objectives

The evaluation focuses on the effectiveness of the Advocacy Initiatives to pave the way to a transformative circular economy.

During the evaluation inception phase, EEB, Laudes and Sophoi jointly agreed three interrelated and sequenced objectives.

1. Evaluate Initiative Progress - What's working?
2. Evaluate Initiative Quality - Why is it working?
3. Facilitate Sensemaking and Learning - What to do now?

The goal was to generate, analyse and synthesise data for objective 1 and 2, and use this data to support sensemaking in a Learning Session between implementer (EEB), funder (Laudes) and external evaluator (Sophoi) in 'critical friend' mode.

Design

The evaluation design was unusual in the emphasis it gave to implementers, funders and evaluators learning together as a collective of individuals with unique experiences and perspectives.

The role of Sophoi as the evaluator was to create an independent and summative evidence base which could then be validated, deepened and strengthened with EEB and Laudes in a Learning Session. Through exploring the data that resonated with personal experience, Sophoi were able to negotiate meaning and shared understandings, to support alignment and follow-up action.

This evaluation design unfolded over a number of phases, which are summarised below.

- **Inception and orientation**

The evaluation design needed to respond to two user needs: EEB's eagerness to learn about the effectiveness of the Advocacy Initiative design and Laudes interest to translate this learning into their own internal system for grant monitoring - [the Laudes Foundation Evaluation Rubrics system](#).

To integrate these user needs, Sophoi facilitated the co-development of two integrated evaluative frameworks to assess Initiative Progress and Initiative Quality. The process for co-developing the evaluative frameworks is explained in [Annexe 1](#). [Table 35](#) in [Annexe 11](#) shows how Sophoi arrived at five Progress Pillars which aligned the Advocacy Initiative's strategy to 3 Laudes B rubrics for Early and Later Changes: Stakeholder-informed policies, Exposing and thwarting harm, Multi-stakeholder movements pressure. The rationale for each of the B rubrics rating can be found in [Annexe 5](#). While an illustrative rating is represented for each rubric throughout [Section 2](#).

Sophoi also carried out a [retrospective baselining](#) of these B Rubrics in consultation with Laudes and EEB to contextualise achievements within an understanding of the system status at the beginning of the grant period in 2020. Sophoi then set about looking to evidence 16 early outcomes within the five Progress Pillars (See [Annexe 2](#) below).

The Quality Pillars were structured by the Laudes A rubrics which focus on process-aspects of initiatives including design, implementation, monitoring, communication and learning and organisation and network effectiveness. For this evaluation the A rubrics are informed by Barkhorn,

Huttner and & Blau's Advocacy Assessment Framework to make them advocacy-specific. Sophoi had 20 process outcomes across the five Quality Pillars.

Once the evaluative frameworks and baselines were agreed, the process unfolded as illustrated in [Figure 5](#) in [Annexe 11](#) to collect data, analyse and synthesise, sensemake and learn.

- **Data collection**

Between March and June 2022, Sophoi conducted **semi-structured interviews** with a select group of 21 EEB staff, EEB partners, and other stakeholders to evidence progress and quality of implementation. A list of interviewees is provided in [Annexe 8](#). Two interviews were [bellwether interviews](#), who received little upfront information about the evaluation to gather fresh insights on the transition to a circular economy and how likely business is to act on the policies.

For all other interviewees, Sophoi used five [Key Evaluation Questions](#) to guide semi-structured interviews with internal and external stakeholders. The interviews were appreciative in that they began with asking interviewees to reflect on the Initiative's significant achievements for those who had worked with the Initiative or been affected by it.

The evaluation team evidenced 36 outcomes across Initiative Progress and Initiative Quality through interviewees and a document review. The evaluation team created a master list of outcome level questions used for custom-made interview templates for each interviewee, depending on their their expertise. The evaluation team also used follow-up emails to ask for additional documentation to provide further evidence around perceived achievement, contribution and subsequent change.

Interviews were supported by a **document review** of more than 130 data sources. A full list of documents reviewed is in [Annexe 9](#).

- **Data analysis**

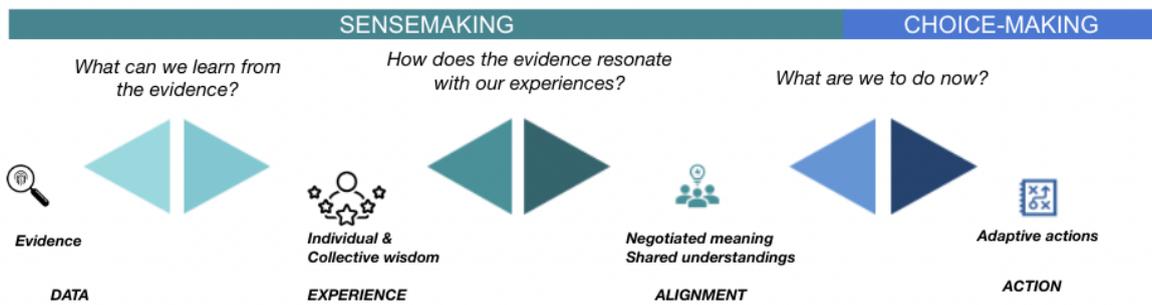
The Sophoi team used a Google Sheets 'data map' to track Progress pillars and associated results, and a tab for Quality Pillars and associated outcomes captured through interviews and the document reviewed. In total Sophoi coded approximately 560 pieces of information arising from the interviews and documents, and reviewed contextual data from more than 130 documents, articles, publications and podcasts. Once the data was coded Sophoi employed [several different analytical tools](#) to assess **Initiative Progress** (see Table [Annexe 11](#)):

To assess **Initiative Quality**, the evaluation team coded evidence against the framework and used the [Laudes 5 point rating scale](#) and combined these assessments with an assessment of what's required to move to Thrivable for design, implementation, monitoring, communication and learning, and organisation and network effectiveness (See [Section 3](#)).

- **Sensemaking**

The Sophoi team created an **evidence report** for a **Learning Session** with EEB, Laudes and Sophoi on 21st June 2022 to move through the sensemaking and choice-making process in the diagram below. Sophoi reviewed and reflected on the evidence of Initiative Progress and Initiative Quality, before negotiating what resonated within each of us into collectively-held knowledge about what to prioritise and adapt going forward.

Figure 2 The evaluation’s sensemaking process



The evaluation team were guided by the following broad questions:

1. What can the sensemaking team (EEB, Laudes, and Sophoi) learn from the evidence?
2. How does the evidence resonate with EEB's experience?
3. What are does the sensemaking team to do now?

The opportunity to discuss the evidence allowed understandings to be clarified, nuanced and deepened. The conversations between implementer, funder and independent evaluator shaped ideas about future directions. The Sophoi team documented the main discussion points in the final plenary session for this report (see [Section 5](#)).

Section 2: Evidence on Initiative Progress

2.1 Sustainable Products and Materials Policy

2.1.1 Summary of progress

The Advocacy Initiative has made significant progress influencing the European Commission on sustainable product and materials policy. The evaluation team have evidence that the team has worked collaboratively and effectively across key policy files over the past two years.

Focused technical work on EU policy strategies, proposals, regulations and directives have been supported by the team's relational and communications work across many scales of the system – regional, national and global – and between many different actors – EU policy makers, EU politicians, NGOs, academics, businesses, and consumers – to leverage civil society influence. Across stakeholders that Sophoi interviewed, the Advocacy Initiative is considered to ambitiously push the boundaries of what's possible within the EU circular economy system. Key achievements in Sustainable Products regulation, EU Textile strategy and Whole Life Carbon (see Table 3) have shifted the rubrics rating from “unconductive” to “partly conductive”.

A more advanced rubrics rating was not possible because internal and external stakeholders felt that the Advocacy Initiative's high ambitions are yet to be fully met, and the progress made does not comprehensively address the urgency of current environmental and social challenges. Even where the Advocacy Initiative has had clear policy wins, EEB and partners are anticipating resistance as they move from policy proposals and frameworks to implementation and legislation. This may result in weakened positions and socio-economic consequences not currently foreseen in the policy texts.

This raises concerns about whether the research and technical capacity within civil society can be grown at sufficient pace to provide evidence on product and materials circularity which i) grow capacity and technical knowledge within member state and at European Commission, ii) removes hesitancy to promote circularity as a viable business model, and iii) matures policies which stand up to greenwashing and counter lobbying.

2.1.2 Distance travelled

The baseline assessment of “unconductive” for Laudes rubric B1 ([Stakeholder-informed policies](#)) reflects that in 2020 the European Commission did not have a policy on sustainable textiles, its built environment policy was nearly exclusively focused on energy, and the Ecodesign policy only covered energy-using products.

Table 3 evidences the Advocacy Initiative's key achievements as identified by internal and external stakeholders the evaluation team spoke to. These gains on Sustainable Products Regulation, EU Textile Strategy and the Whole Life Carbon Campaign can be traced back to specific work undertaken by the Advocacy Initiative. Ground has been gained across sustainable products and textiles despite significant delays in the legislative process due to Covid and substantial lobbying.

Beyond these key achievements, it's also worth noting how the Advocacy Initiative has worked across silos to strengthen product policy. For example, the team has worked directly with EU staff members to make an evidence-based request (see [Discussion Starters](#) and [Traceability and Transparency About Chemicals in Products](#)) for a policy bridge between chemicals and product both to i) reduce harmful chemicals in products ii) consider how product functionality may remove the need for chemicals altogether. A clear example of how EEB's persistence and consistency in approach resulted in a meeting bringing product and chemical teams within the EU together.

Table 3 Key achievements and evidence of contribution for Sustainable Products and Materials Policy

Key achievement	Evidence of contribution
<p>Sustainable Products Policy Initiative and subsequent Regulation Both internal and external stakeholders recognised how much the Sustainable Products Regulation (including the Ecodesign policy framework) released on 30/03/22 reflects EEB’s ideas.</p> <p>Specifically article 1 & 5 & 6 & 7 and Annexe 1 list the criteria that could be addressed through the Ecodesign policy, reflecting the asks of the Advocacy Initiative on circularity, footprinting, recycled contents, microplastics, and substances of concern. Articles 8 to 13 describe the Digital product passport. Article 17 represents proposals for securing a cross-stakeholder Ecodesign Forum. Article 20 signposts a possible ban of the destruction of unsold goods.</p>	<p>The Regulation proposals apply the Ecodesign policy requirements to a very broad range of products and special mention is made in the introduction of the proposal that “the package includes targeted sectoral initiatives on textiles and construction products”.</p> <p><i>“They [the EEB] have been working on this for a long time with a combination of persistence and technical expertise, following through and bringing the regulation to a place where they have seen a positive result. That is a major outcome.”</i> - External Stakeholder</p>
<p>The EU Textile Strategy EEB priorities are reflected in the annexed action plan to the Strategy.</p> <p>Provisions for reparability and durability within the Textiles Strategy were highlighted as a particular advocacy win for the Advocacy Initiative.</p> <p>The distinction between textile waste and low grade second hand clothes is also significant given that retailers in receiving countries only make a profit on 20% of bales received, increasing debt and waste.</p>	<p><i>“It’s unlikely that we would’ve reached that message [on reparability and durability] in that strategy without the EEB”</i> - External stakeholder</p> <p>Persistent dialogue and engagements with policy officers and rapporteurs, strategic campaigns (e.g Wardrobe Change), shadow strategies, studies on Extended Producer Responsibility for Textiles, the formation of the Textiles Taskforce and position papers issued during the product period on the Ecodesign policy, Product Passport, Extender Producer Responsibility and targets for reuse and recycling contributed.</p> <p><i>“There was one or two pieces of legislation that were in place before the Textiles Strategy – now there is a clear vision with focus on exactly where the issues are”</i> - Internal stakeholder</p>
<p>Increasing ambition with the Whole Life Carbon Campaign for the Energy Performance Buildings Directive</p> <p>The Advocacy Initiative uses the EEBs platform to disseminate local level experiences under the Whole Life Carbon roadmap which may influence the buildings sector materials policy.</p>	<p>The EEB, with close partners Environmental Coalition on Standards and Buildings Performance Institute Europe, have produced a campaign designed to influence the Energy Performance Buildings Directives' net zero regulations. This includes publishing and disseminating reports (on policies for climate ambition, the EU zero emissions strategy, and decarbonising the EU building stock) on the built environment through Meta (EEBs key communications channel and social media) as well as contributing to key events, forums and workshops.</p> <p>The EC (DG ENV) have since commissioned a roadmap introducing EU Whole Life Carbon (ongoing).</p> <p>The EEB, with close partners Environmental Coalition on Standards and Buildings Performance Institute Europe, have produced a campaign designed to influence the Energy Performance Buildings Directives net zero regulations. This includes publishing and disseminating reports (on policies for climate ambition, the EU zero emissions strategy, and decarbonising the EU building stock) on the built environment through Meta (EEBs key</p>

communications channel and social media) as well as contributing to key [events](#), [forums](#) and workshops.

The EC (DG ENV) have since commissioned a [roadmap](#) introducing EU Whole Life Carbon (ongoing).

While the Energy Performance Buildings Directive (article 7) directs public new buildings to be zero by 2027 the directive does not mandate that Whole Life Carbon be taken into account. Considering Whole Life Carbon in the Extended Producer Responsibility was a key goal of the Advocacy Initiative and while the EEBs contribution is evident in [position papers](#) and [publications](#), more work is required.

2.1.3 System response

Many stakeholders felt that the relationship between the policy gains and positive change resides in follow-up action and implementation. For example, there is work to be done to plug gaps in the Textile Strategy (for example by working on social criteria into Due Diligence policy) and in raising awareness among civil society actors of the socio-economic implications of the Energy Performance Buildings Directive (for example through provision of social safeguards so energy performance improvements to not result in higher rental costs or “renovictions”).

Table 4 Signals of resistance and change for Sustainable Products and Materials Policy

Signals of resistance	Signals of change
<p>Exclusions in Textile Strategy:</p> <ul style="list-style-type: none"> - A resource reduction approach including resource reduction targets - Integrating due diligence and foreign policy - Social issues <p>Exclusions in product circularity:</p> <p>Decomposition is a missing link in most circular models and new product technologies are required. Work is still to be done progressing the use of natural-based vs fossil fuel-based materials like viscose.</p> <p>Increased activity in industry - potential push-back:</p> <p>Brands are hiring Public Affairs staff for the first time - to track legislative processes. Sustainability is entering core business functions, like legal departments.</p> <p>Expected counter-lobbying by industry:</p> <p>There is a concern that horizontal policies in the Sustainable Products Regulation are broader and lighter-touch, creating space for industry to dilute product-specific requirements.</p>	<p>Increased activity in industry:</p> <p>Sustainability is becoming a C Suite concern:</p> <p><i>“What is shocking them is the robust nature of the EU package and so much has to be addressed at once ... So now sustainability is being taken seriously because it has a legislative component and this is a very big shift” - External Stakeholder.</i></p> <p>And in trade press like Vogue Business:</p> <p><i>The European Union, for example, is set to introduce draft legislation covering due diligence, eco design and product labelling this year, which would affect all companies doing business in the EU. “There is a massive amount of movement and I do think that we will start to see the impact of this year,” Claire Bergkamp, chief operating officer at global non-profit Textile Exchange, says.</i></p> <p>Increased activity in traceability of waste exports:</p> <p>Following the Textile Strategy a EU Invitation to Tender to improve traceability of exports of used textiles / textiles waste and improving recycling textile waste within the EU is an important signal of change for countries outside the</p>

EU who are on [the frontline of the fashion system's waste crisis](#).

And the potential impact of this is being felt by businesses:

"Transparency and traceability - a key element of a lot of these legislative packages - is now rocketing to the top of agendas. It was simply something they were playing with and now they have to implement it" - External Stakeholder.

Excluded voices in Energy Performance Buildings Directive:

Voices from the Energy Efficiency lobby are centred in the policy debate, at the exclusion of the manufacturing and recycling sector, hampering progress on product design and circularity.

"This limits the EEB's entry into the discussion. A change in approach in how the industry and policymakers see the Energy Performance Buildings Directive beyond energy efficiency is required ... this is a change of mindset, and that is not easy to achieve" - Internal Stakeholder

Expected counter-lobbying:

The feedback from industry is that they are not ready for Whole Life Carbon disclosures as soon as 2027 or 2030, where Civil Society sees these targets as too late.

Expected push back by EU parliament Council and European Parliamentary Committee on Industry, Research and Energy (ITRE):

EEB aims to get Whole Life Carbon obligations through the EU Parliament but anticipate conservative reactions by the Council and ITRE.

People talking more about Whole Life Carbon:

The Directorate-General for Energy is increasingly talking about the need to consider embodied carbon at public events.

The Building Life campaign has resulted in an increase in the number of high-level meetings and invitations to speak at events.

Article 7 in the EED proposal from July 2021 refers to Whole Life Cycle emissions when extending obligations to public authority-owned buildings.

Integrating Whole Life Carbon and sufficiency:

Strong alignment among NGOs and the Built Environment Task Force on the need for Whole Life Carbon, and increasingly sufficiency rules being integrated into Whole Life Carbon positions - e.g., [energy consumption per person vs per metre sq.](#)

2.1.4 Rubrics assessment

Based on evidence of distance travelled and system response, the rubrics assessment shows change from “unconductive” to “partly conductive” for Rubric B1 which focuses on building the right processes to create strong, stakeholder-informed policy reforms. A rationale is provided in [Annexe 6](#).

Table 5 Rubrics assessment for Sustainable Products and Materials Policy

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022
B1 Stakeholder -informed policies	Framework policy includes EEB priority points on products and sustainable performance criteria	Unconductive	Partly conductive

2.1.5 Future opportunities

To explore future opportunities related to each achievement the evaluation team pose questions which reflect the issues that energised interviewees internal and external to EEB during conversations.

On the process of influencing policy:

- How might we (the EEB) achieve horizontal provisions for eco-design without opening up the possibility for industry to dilute product specific requirements?
- How might we strengthen the policy influencing power of the reuse, reduce, repair on top of recycling industries?
- Can we conduct socio-economic impact assessments on policy files within or outside the EU (most pressingly the Textile Strategy and the Energy Performance Buildings Directive) to inform our understanding of the socio-economic provisions that need to be integrated into decarbonisation goals?
- When faced with policy delays beyond our control, what are we to do - to anticipate and respond?

On the process of policy implementation:

- How do we create space to innovate on the practical solutions which will translate the policy frameworks into action plans?
- What does the next phase of member country focussed support look like? How do we cascade policy successes across member states without diluting/delaying ambition?

On influencing upcoming policy files:

- More on EPR, Ecodesign to extend beyond existing product groups, notably textiles?
- On Green Claims, making it a real ‘force’ against greenwashing?

2.2 Fiscal and economic instruments

2.2.1 Summary of progress

Progress on fiscal and economic instruments has been made over the grant period but there was alignment among interviewees that the pace and scale of change is not sufficient to make the transition to a circular economy an economic interest of industry.

The Advocacy Initiative works with other coalitions focusing on fiscal issues, and the growing linkages between the team and various de-growth and post-growth economists lend credibility to the Initiative and strengthens partnerships and collaborations.

However, the ability to anticipate market responses to fiscal and economic policies may require interdisciplinary work with i) classically-trained economists who can model narrow financial implications for industry and ii) complexity-based economists like [the international research network exploring Emergent Political Economies](#) who are using complexity-based approaches to explore money, power, governance, and justice. The Advocacy Initiative would also benefit from increased linkages into the new economics space, including practical initiatives that are enabling commons-based infrastructures to flourish.

2.2.2 Distance travelled

The baseline assessment of “unconducive” for Laudes rubric B5.1 ([Accelerated mobilisation of fiscal and economic instruments at EU and national levels to address resource use in fashion and built environment sectors](#)) reflects that in 2020 the EU did not have any economic instruments to incentivise circular fashion, nor circularity in the construction of the built environment, except landfill waste charges. This is despite [recent reviews](#) showing that market and financial factors, such as low virgin material prices and lack of fiscal incentives, pose some of the largest barriers to a circular transition.

The Advocacy Initiative influenced policies and financial incentives to reduce use of virgin resources, promote business models that save on resource use and extend the geographical reach of Extended Producer Responsibility schemes for textiles and construction products. In an annexed action plan for the Textile Strategy the document states that Extended Producer Responsibility requirements will come into effect in 2023, including fees and measures to promote the [waste hierarchy](#) in the Waste Framework Directive: prevention, preparing for reuse, recycling, recovery and disposal. While there is only one EPR scheme in the EU so far (France) there are no other mandatory EPR schemes in the EU for building materials or textiles yet, Sweden, Netherlands and Belgium are in discussions to develop various EPR schemes.

Within the built environment, efforts have been focused on the development of circularity criteria for buildings for the EU sustainable finance taxonomy and an evidence report on how financial and economic instruments promote a decarbonising environment for the EU (incomplete but reflected in a [recently released TOR](#)). The Advocacy Initiative's engagement with the taxonomy sought to influence what is classified as green investment in the building sector. These decisions will in turn shape what products and business models it's possible to incentivise and discourage.

When the evaluation team combined the countries actively discussing and implementing virgin resource reduction targets - the Netherlands, Finland, Belgium, with those countries that have plans on taxation like Sweden, more than six member states are currently progressing fiscal and economic incentives. The Advocacy Initiative may have influenced this movement, but EEB is one of many stakeholders and institutions calling for a tax shift, making contributions difficult to discern.

Mandatory requirements regarding Green Public Procurement will come into force in 2024 through the Textile Strategy alongside member state incentives. Article 7 from the Energy Efficiency Directive proposal from July 2021 places Green Public Procurement obligations on public authority-owned buildings and makes reference to the calculation of embodied emissions. The policy landscape for new buildings owned by public authorities is not as ambitious. The Energy Performance of Buildings Directive is yet to include Whole Life Carbon as part of its plan for new public buildings to qualify as zero emissions by 2027.

Table 6 evidences discrete areas of fiscal and economic policy where the Advocacy Initiative’s contribution was significant and clear.

Table 6 Key achievements and evidence of contribution for Fiscal and Economic instruments

Key achievement	Evidence of contribution
<p>Inclusion of Extended Producer Responsibility in the Textile Strategy</p> <p>The Strategy states that the Commission will propose harmonised EU Extended Producer Responsibility rules for textiles with eco-modulation of fees, as part of the forthcoming revision of the Waste Framework Directive in 2023. This reflects the call by EEB on Extended Producer Responsibility schemes and modulation of fees - with the aim of creating an economy for collection sorting, reuse, preparation for reuse and recycling, as well as incentivising product design for circularity.</p>	<p>EEB and Changing Markets weren't sure if the Extended Producer Responsibility would be included in the Textiles Strategy and began a concerted campaign to include the Extended Producer Responsibility using EC connections and several publications and social media messaging.</p> <p>A tangible output was a commissioned report on textiles and Extended Producer Responsibility schemes and supporting measures that would present clear recommendations around the type of policy instruments that should be implemented in EU States.</p>
<p>Contributing to the EU Sustainable Finance Taxonomy definitions for building materials in new buildings</p> <p>The Advocacy Initiative was engaged in providing evidence and data to inform definitions for the EU Taxonomy specifically on building materials and aimed to increase targets for the use of secondary materials in buildings in line with the Circular Economy Action Plan from a consensus around 30% to an ambitious 50%.</p> <p>This may be considered a ‘win’ in the context of the entire circular economy landscape, but the discussion took place as part of the Platform on Sustainable finance: Technical Working Group platform that hosted a wide variety of stakeholders, including a strong construction industry group. It signifies the way EEB is able to take advantage of opportunities that arise and propose policies that are reasonable to dissenters and allies alike.</p>	<p>The team was central to driving up ambition in policy dialogue. There are many construction companies who are resistant to ambitious targets on use of secondary materials. There was agreement to double use of secondary materials from 15% to 30% by 2030 in line with the current circular economy action plan targets.</p> <p>However, the Advocacy Initiative pushed to elevate use of secondary materials in new buildings from 30% to 50%. The team suggested that existing and new buildings shouldn’t be treated as one and the same. Existing buildings already contain secondary materials.</p> <p><i>"The asset comprises at least 50% (either by weight or by surface area of building elements including facades, roofs and internal walls and floors) from a combination of re-used components, recycled content, or responsibly-sourced renewable materials."</i> Platform on Sustainable Finance: Technical Working Group Part B Annex: Technical Screening Criteria March 2022</p>

2.2.3 System response

Despite being able to evidence some of the key fiscal and economic changes set out in the Advocacy Initiative grant proposal, there is consensus that the combination of fiscal penalties and rewards have not reached a tipping point where it no longer makes economic sense to persist with 'business-as-usual'. This means that companies will not transform quick enough to meet decarbonisation targets.

The general concern is that the policy progress on fiscal and economic instruments (see above) will not have an effect on the system in any significant way if, for example, the fees associated with Extender Producer Responsibility in Textiles don't shift behaviour or further exclude vulnerable groups in the supply chain. Another perceived risk or unintended consequence is also concern that the built environment sector will find ways to pass on energy efficiency costs to those with least resilience in the ecosystem with implications for reduced investment in social housing, for example, compared to luxury housing and for tenants in private rental sectors, especially once new energy efficiency requirements are added to profit-loss calculations.

Markets move quickly, requiring that advocacy moves just as quickly to seize opportunities.

"The EEB is this large organisation (an elephant, a dinosaur - in a good way!) with value and importance but with this size comes an in-agility and in-flexibility. If you are trying to influence markets you need to be agile and lead from opportunities rather than having an established work programme" - External Stakeholders

"From the Spanish point of view EU directives tend to be something that fly over you, so social actors and civil society have to be aware to exploit it as much as they can. To pressure local and regional governments to give more financial incentives to renovate homes" - External Stakeholder

Reflecting strategically, internal and external stakeholders noted that more innovation is required to design fiscal instruments that befit a circular business model which can deliver environmental regeneration and social justice. Policy on circularity and sustainability will also need to find new ways of value capture and creation.

Table 7 Signals of resistance and change for Fiscal and Economics Instruments

Signals of resistance	Signals of change
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Limitations to the implementation of CE taxes in member states

While the European Commission and Parliament can shape system-wide policies, taxation and fiscal instruments are dictated by member states and European Commission can only encourage the use of specific tax rules and would need to add substantially more pressure on resource to shift the uptake of these tax regimes. National CSOs, therefore, require the capacity to apply pressure on national governments, while the EC could apply more pressure on domestic tax regimes aligned with EU policies and targets.

For example, while some member states like [Sweden](#), the [Netherlands and Croatia](#) have progressive CE taxes in place (implemented before the Advocacy Initiative), others such as Italy, Portugal and Austria have very low taxes on resources and pollution.

Limited legislative and investment activity to support Small Medium Enterprises in the transition.

Financial investment instruments and investments are specifically effective in Europe and not available to catalyse innovation across supply chain systems, and are less effective outside the continent.

While the EU taxonomy and complementary policy instruments support innovation for European supply chains, there are too few policies incentivising [the level of investment capital investment for required to resource the innovation required in supply chain systems to meet climate targets](#) the innovation of supply chain systems outside Europe to meet climate targets.

Limited legislative activity to support new and diverse economic forms and structures.

Different ways of organising the economy - e.g., the commons, cooperatives, budget transparency, exit to the community - [are still having to hack existing fiscal and legal frameworks to find ways to operate legitimately.](#)

Industry in the textile industry are open to harmonised and incentivised legislation.

In line with [Alice Bah Juhnke of the European Parliament's Intergroup on the Green New Deal](#), forward-looking business wants harmonised legislation, so they don't have increased costs associated with changing how they do business across EU member states.

Also, the business community is looking for the legislation to be impact-oriented, otherwise, it creates frustrations for companies paying for a "tick-box" exercise and for the NGOs who have to do all the monitoring:

"What the industry says is... the legislation shouldn't be administrative. It'll cost us to report on stuff and we don't find this interesting" - External Stakeholder.

Companies are beginning to consider investor Environmental Social Governance requirements.

To avoid being considered a "stranded asset" in the context of climate change and society's attitudes towards social justice issues, companies are increasingly trying to make sense of ESG requirements from a business operations perspective.

2.2.4 Rubrics assessment

To reflect what the evaluation team were able to evidence from distance travelled and system response, the rubrics assessment shows no change from “unconductive”. Even though good work has been done to progress policy, it has yet to catalyse changes to markets at the pace and scale required to support the transition to a circular economy. A rationale is provided in [Annexe 6](#).

Table 8 Rubrics assessment for Fiscal and Economic Instruments

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022
B5. Exposure of harmful practices and thwarting of counter-lobby	B5.1 Accelerated mobilisation of fiscal and economic instruments at EU and national levels to address resource use in fashion and built environment sectors	Unconductive	Unconductive

2.2.5 Future opportunities

While instruments like VAT and tax work for linear models, the reality is that redistribution of power and wealth will be the fuel that circularity will run on. The redistribution of power and wealth will likely entail creative use of existing fiscal and legal instruments to repurpose business and industry in service of people and the planet.

Key questions that emerged to guide future-oriented thinking included:

- What is the tipping point by which it no longer makes economic sense to stay with “business-as-usual”?
- What other fiscal frameworks can the EEB leverage - e.g., financial disclosure frameworks, Environmental Social Governance investing, venture capital?
- What does an economic incentive for embodied emissions look like?
- How are Small Medium Enterprise motivations, concerns and realities (e.g., poverty entrepreneurship) brought into the policy picture?
- How do EPR/Waste fees follow products shipped for reuse, so they are used to redress the harm caused by waste streams?
- How can high emission/material consumption alongside common practice in business to set ambitious growth targets to be fiscally disincentivised?
- The EU Commission has referred to social criteria as 'belonging' to the due diligence of companies. What are the implications of a company perspective for regulating entire supply chain systems?

2.3 New consumption narratives

2.3.1 Summary of progress

Translating new consumption narratives into specific policy requests that build new economic forms, and enable us to transition to them in socially and environmentally just ways, requires innovation. Orienting an entire legislative body like the European Union and its regulated market is ambitious. It's a longer-term strategy, echoing the 'near and far' time horizons EEB straddles with the Advocacy Initiative. This evaluation has also found that the inclusion of new consumption narratives within the Advocacy Initiative adds 'here-and-now' value too.

Policy narratives are important for integrating circular economy activities and for building political will. This is evident in the Advocacy Initiative, for example, where values-based approaches like the [Wellbeing Economy](#) and [Growth Without Economic Growth](#) help diverse stakeholders reach a consensus about what's important. The frames these narratives provide opportunities to bring different perspectives and issues into direct policy asks, where there is no precedent, including the product environmental footprint framework and the product labelling scheme.

"The maturity of messaging showcases examples of circular economy practices and direct policy asks, which have been worked through honest conversations about what's possible ... innovation is trying to navigate the nuances rather than duplicate messages that are already out there." - Internal Stakeholder

Interweaving direct policy asks into new narratives and scientific advances is an important value point for the Advocacy Initiative because policy makers are looking for quality information, which extends their current understanding:

Coming back to the quality of information, it's difficult to distinguish what is quality information, what is adding value, what is complementary and what is repetitive. This is an important factor for EEA and for DG Environment". - External Stakeholder

In Sophoi's experience, the value of the Advocacy Initiative acting as a translator between overall narrative and granular policy cannot be underestimated when paving new paths towards a circular economy transition. The human tolerance for dealing with uncertainty is low. It is through being able to visualise solutions and the opportunities they present that momentum is created and sustained..

2.3.2 Distance travelled

The baseline assessment of "unconducive" for Laudes rubric B5.2 (Policy decisions in fashion and built environment sectors are increasingly supported by post growth and need for new consumption narratives) reflects that in 2020, 73% of textiles ended up in landfill or incineration while demolition remains the norm for construction materials, which represent 33% of [EU waste](#).

Progress has been more evident with the broad adoption of new economic narratives (e.g., overconsumption and sufficiency) than with shifting business norms within the textile and built environment sectors). This sequencing of progress might be expected: new behaviours often flow from the stories we tell each other and the stories we tell ourselves.

Over the past two years, the Advocacy Initiative has been evolving its communication of new

consumption narratives through probing, sensing and responding. The team are pragmatic – carefully selecting their narrative according to their audience, tailoring and personalising their approach:

“EEB is working a lot in fostering conversations around degrowth and wellbeing, not just the circular economy ... my sense is that it is resonating” - External Stakeholder

“EEB are very strong on campaigning, they’re strong on communication. They do it in a different way where the messages are repeated and with a different level of depth depending on the audience” - External Stakeholder

“EEB relies on its credibility and reputation of being able to move from high level political messaging to the “nitty gritty” details of the legislations and being able to communicate with experts at multiple levels. From policy officers to policymakers” - Internal stakeholder.

The Advocacy Initiative team is delicate with messaging. They are rarely talking about “de-growth” because it doesn’t land well enough politically:

“The post-growth and de-growth narrative is a whole academic framework - a lot of things fall under it, while doughnut economics is a set of specific targets to visualise the social and environmental and the wellbeing economy is broader again but I'd say it is less confronting. It is a lower barrier for politicians to engage with. They feel uncomfortable to engage with de-growth and post-growth and the academics choose it because they know these terms will not be used and co-opted by politicians. We sit in the middle and we use what works where we feel it is applicable. We are not here to claim moral high ground, we are here to change society for the better”. - Internal Stakeholder

The Advocacy Initiative has created momentum for lowering production and consumption levels in the textile sector. Within the built environment sector, the Advocacy Initiative has tabled the idea of sufficiency in EU building sector policy forums (including industry, policymakers, and civil society) as well as within the IPCC. Sufficiency is gaining ground as a concept that policy instruments can help to realise. Beyond the key achievements, the team has extended its reach into other policy files that could serve the Advocacy Initiative’s goals. For example, they have [supported the Industry team](#) to secure provisions on the Circular Economy in articles 11 and 14 and 15 of the revised text of the Industrial Emissions Directive.

The key achievements in Table 9 describe how the diversity in EEB’s approach has had successes at different levels of the system.

Table 9 Key achievements and evidence of contribution for New Consumption Narratives

Key achievement	Evidence of contribution
<p>European Environment Agency report Growth without Economic Growth reference the work of the Advocacy Initiative</p> <p>EEB uses the references to start a collaboration with the European Environment Agency which culminates in leading Green MEPs Timmermans cabinet and 500 people joining a debate on what it means for the EU.</p>	<p>EEB’s evidence and thinking informed an EU report. And then the team proactively reached out to the authors of the Growth Without Economic Growth report to help them promote its findings in a public event. The success of this event built trust and EEB continued to collaborate with the European Environment Agency – commenting on early drafts of reports. Recently the EEB team were invited to help shortlist the key reports the European Environment Agency should publicise, which is an opportunity to influence content strategy. EEB was also a keynote speaker, together with Club de Rome, in an EC moderated event around an EEA report on narratives for change</p>
<p>EEB lobbying influences the 10-year environmental action plan</p> <p>The EEB’s lobby work at the highest levels of the European Council secured a positive change in wording within the 10-year environmental action plan of the 3 EU institutions that became law in spring 2022. The 10-year environmental action plan of three EU institutions (Commission, Parliament and Council) that became law in spring 2022 have clear language around accelerating the transition to a circular and wellbeing economy. This is wider in scope than the 'economy of wellbeing'. This new opportunity is the result of years of work on the wellbeing economy as well as targeted lobby efforts on specifics of the narrative used in the 8EAP.</p>	<p>The EEB has nurtured and built a relationship with senior leadership at the European Commission to get references to the wellbeing economy recommendations included in Council conclusions. The Advocacy Initiative was able to change the wording.</p> <p>The EEB has hosted events and published papers where this wording is evident.</p>
<p>European Environment Agency report on circular business models for textiles and fashion</p> <p>Published in February 2022, this report was described as a waypoint to indicate how far the EU has moved in the past half-decade to embrace the Circular Economy as a key objective.</p>	<p>Since 2015 – when the Ecodesign policy was under threat, EEB and key partners have contributed to a fundamental change in the wider narrative encompassing environmental policies and regulations. It has moved from being a narrow concept (e.g., materials and technological innovation) to being more broadly considered as a framework for re-thinking business models and the economy.</p>
<p>The Wellbeing Wardrobe report calls for a new way forward – the Wellbeing Economy.</p> <p>The report is well-argued and practical in its suggestions on ways forward for the textile sector. It is good to see the big idea of a growth-alternative economy in tangible steps policy makers can take.</p> <p><i>“The report is a first attempt to bring together the policy framework with the degrowth community and the circular fashion community, with academia – and knit all these different perspectives and experiences together” - Internal Stakeholder</i></p>	<p>The team commissioned the report and convened a new group of stakeholders from outside the circular economy landscape in its development.</p> <p><i>“In the wellbeing wardrobe work we did, I felt strong connections between narrative work, reinforced networks (both academic and NGO) and a focus on a product (textiles)” - Internal Stakeholder.</i></p> <p><i>“Through conversations, we have had we see that the report has been received warmly. Its very existence is seen as valuable to those working for deep change, that the work has changed the landscape by the very act of it being commissioned” - External Stakeholder.</i></p>

Introducing sufficiency and familiarising the concept among civil society and policy makers.

Sufficiency is not yet in the Energy Performance Buildings Directive but sufficiency is in the [2021 IPCC report](#) and in the [June 2022 ITRE Committee draft report](#) within the EU parliament on Energy Performance Buildings Directive, including important amendments on empty buildings.

EEB submitted a response to the IPCC report, providing evidence to argue for it being a topic in need of discussion. The team then set about disseminating the evidence and the findings through different [webinars](#) with EIS and Environmental Coalition on Standards and during sustainability week.

EEB launched two reports on sufficiency and circularity in the building sector, providing evidence of the need to elaborate sufficiency policies. In the next months, another report on sufficiency and financial incentives to promote a decarbonised built environment will be launched

"A key achievement of the taskforce is the inclusion of circularity and sufficiency - compared to other organisations working on these topics. From the Spanish perspective, sufficiency is something we hadn't heard before EEB brought it to discussions about 8 months ago. For example, this Saturday, there were some sessions face to face and online focused on degrowth organised by one of the main left political parties in the country and they did speak a lot about sufficiency which is something I honestly hadn't heard in the whole country before." - External Stakeholder

EEB also responded to the shifting narrative on energy during the Ukraine crisis in Jan-Feb 2022 to emphasise the importance of sufficiency. Following [letters](#) to the European Commission in March 2022 and an opinion piece and a statement [in April 2022](#) the evaluation team can see sufficiency is now partially reflected in the [RE Power EU plan](#), which is the post-Ukraine energy strategy.

The EEB also joined ADEME to organise a dedicated workshop on sufficiency in buildings in the ECEEE summer study.

The stunt was EEB's idea, facilitated by committed colleagues operating with constrained communications resources.

In an example of "planting seeds for action to come", EEB spoke to the Doughnut Economics Lab and learned from them how to present the doughnut economy as non-divisive and a-political.

The policy asks for the replacement of GDP indicators with wellbeing indicators, material footprint reduction targets and Greenhouse Gas reduction targets.

The Doughnut Economics intervention (May 2022) resulted in new and varied support

Placards, tasty vegan doughnuts and menus for a future economy that respects planetary boundaries and a minimum level of wellbeing for all providing a playful way into new consumption narratives. They have new relationships with Kate Raworth, new relationships with the Deputy Chief Economist of the EU Commission and new contacts within the EU parliament. These relationships often culminate in invitations to speak at events and on discussion panels.

2.3.3 System response

Ten years ago, people didn't know what was meant by the Circular Economy. Today it has become a buzzword. In fields adjacent to the built environment and textiles – for example, the field of mobility and cars – “what seemed completely unrealistic four or five years ago now seems widely accepted” (External Stakeholder). But as the evidence has been amassing, it has become clear that “we can't just recycle ourselves out of this mess” (External Stakeholder).

The evaluation team have collected evidence that the narrative surrounding policies have been important both for holding on to the integrated nature of circular economy work and for building political will. It is the policy and the way it is talked about that work in combination to bring about change.

Maintaining the integrated nature of circular policy work is not easy:

“In textiles when you're working on one area, it quickly becomes about everything. You cannot work on toxic chemicals without working on fairness. It's hard to work on microplastics without talking about labelling, you end up getting into every discussion through every sort of avenue so it's quite hard to contain the work, which is so which is good that we have a policy framework because then the idea of a framework is that it's essentially like the whole vision rather than just one aspect” - Internal Stakeholder.

It is a similar experience in the built environment sector, where the ability to go wider and see the big picture makes more focused policy advocacy more effective.

“If you are advocating for total phase out from one tech to another what are the consequences geo-politically, economically? You don't think about these bigger issues in day-to-day advocacy work but there are organisations that do work a lot on principles and ideas and it brings information, which when discussing with businesses and policy makers, we can use.” - External Stakeholder

New consumption narratives anchor specific policy developments. They can also be used to call out misalignments, for example in fiscal growth expectations, greenwashing or industry co-option of the term “circular economy” within a business-as-usual approach. As the team has been learning about the new consumption narratives that gain the greatest traction with politicians, policy makers and the wider public, they are also able to use strategic communication events to open doors into conversations about policy change:

“From one comes the other. It's a playful stunt, you get a bit of media and you get people together and then you get invitations to explore the actual content [of doughnut economics] as part of a political process” - Internal Stakeholder

Table 10 illustrates how the evaluation team can evidence some signals of positive change flowing from the attention given to new consumption narratives in the Advocacy Initiative. However, the particular interests of dominant groups – big brands in textiles, the energy and manufacturing lobbies in the built environment – still means their interests are accepted by EU level policy makers

as the “common interest”. For example, the ease with which industry can assert unsustainable growth projections in both sectors shows how disconnected current consumption models remain from the material reality of resource use on the planet.

Table 10 Signals of resistance and change for New Consumption Narratives

Signals of resistance	Signals of change
<p>Fiscal growth expectations continue post-COVID in the textile sector.</p> <p><i>"It is ... not unusual for companies in the apparel and textile sector to have annual growth targets of more than 10%, and in some cases 20% or more. Growing at these rates presents an overwhelming challenge when combined with absolute emissions reduction targets." - External Stakeholder</i></p> <p>For 20% the growth emissions need to fall by 94% to stay in the budget for 2030</p> <p>Housing is a commodity before it is a right.</p> <p><i>"When housing is seen less as a right and more something you can invest in, you can see how it affects the whole supply chain and construction process. Land prices are going up because people are trying to get richer through the process of building homes. On the supply chain side, we have a lack of construction materials and of labour, because the profit motive is constricting the pay construction workers are receiving. Because the profit makers need to remain competitive in a saturated market. It ends up affecting the whole housing ecosystem". - External Stakeholder</i></p>	<p>Increased connections between post-growth community and EU policy experts.</p> <p>Following the publication of the Wellbeing Wardrobe, the Advocacy Initiative has received interest from a whole new network of stakeholders – degrowth group, sustainable fashion, academia and researchers – who are now talking with people like EEB who are experts in EU policy.</p> <p>Increased media coverage of overproduction and overconsumption narratives.</p> <p>Overconsumption is not mainstream yet, but it is being picked up more frequently in the media. Careful use of imagery in both sufficiency campaigns and the Wellbeing Wardrobe is helping to reach a broader audience.</p> <p><i>"Seeing our messages taken up by the press and other stakeholders is always an indicator that something is getting through". - Internal Stakeholder</i></p> <p>Increased national activity on the Wellbeing Economy.</p> <p>Wales, Finland and Canada joined the Wellbeing Economies Government alliance (WEGo), Portugal has started a one-year process on the Wellbeing Economy and through EEB's work with them, Bhutan is now showing an interest in this coalition too.</p> <p>ADEME, the French agency on energy, is including the sufficiency approach in their scenarios and is willing to elaborate policies on this.</p>

2.3.4 Rubrics assessment

To reflect what the evaluation team were able to evidence from distance travelled and system response, the rubrics assessment shows the change from “harmful” to “unconductive” for Rubric B5.2 which focuses on the development of new consumption narratives. A rationale is provided in [Annexe 6](#).

Table 11 Rubrics assessment for New Consumption Narratives

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022
B5 Exposure of harmful practices and thwarting of counter-lobby	B5.2 Policy decisions in fashion and built environment sectors are increasingly supported by post-growth and need for new consumption narratives	Harmful	Unconductive

2.3.5 Future opportunities

During conversations questions emerged, reflecting the issues that energised interviewees internal and external to the EEB.

On using new consumption narratives:

- How might the Advocacy Initiative respond to the co-opting of narrative and increased greenwashing?
- How might the Advocacy Initiative frame sufficiency in a way that does not tap into people’s fears that something will be taken away from them?
- How might the Advocacy Initiative generate more civil-society derived evidence for new consumption models and build capacity for counter-lobbying?
- How might the Advocacy Initiative become increasingly agile, modern and able to respond to the attention span of citizens, which is becoming shorter?
- How might the Advocacy Initiative get a more proactive narrative and communication work funded?

On building alliances / key audiences to learn from each other and reinforce mutual perspectives:

- How can the Advocacy Initiative engage unions and industry more?
- How can the Advocacy Initiative broaden messaging out to social development partners – e.g, women’s rights groups?
- How can the Advocacy Initiative engage young people in new consumption narratives?

2.4 Influencing EU Trade

2.4.1 Summary of progress

The pivot that the Advocacy Initiative made away from influencing EU trade directly to working on waste shipment and mechanisms that enforce the EEB's sustainable product policy ambitions was useful and timely. It is to the team's credit that they appraised the situation correctly and acted accordingly, even when this meant shifting focus from the initial grant agreement. With the benefit of hindsight, these sorts of pivots can look obvious, but in the moment of making the decision, it's typical for things to feel less certain.

The evidence reflects the Initiative's ability to identify inconsistencies across policies and experiment with integrating them to form a new legal instrument which can help with enforcement. This has shifted the rubric rating from "harmful" to "unconducive".

The inclusion of the Access to Justice provisions in the Due Diligence proposal could mark a turning point for consideration of the socio-economic impact of specific policy files. That said, there are few positive signals of change in the wider landscape. Partly this is because it is too early in the policy process to tell whether the distance travelled will be sustained. And partly this is because member states and industry remain reluctant to get on board with ambitious policy leaps forward.

2.4.2 Distance travelled

During the Initiative period the team pivoted to focus more deliberately on Due Diligence, waste shipment regulation and mechanisms including consumer empowerment, corporate responsibility and due diligence to uphold sustainability principles in product policy and push for a just transition to a circular economy. This course correction did not create a setback for the Advocacy Initiative (see RAG rating in [Table 31](#) in Annex 5). In a show of pragmatism, the team moved with confidence to work with the policy files where leverage and influence was possible.

The team have substantially progressed the Waste Shipment regulation, demonstrating technical expertise in the way they read across different policy files for inconsistencies. For example, their work identifying weaknesses in the revised waste regulations which resulted in misalignment and inconsistencies between proposals and the EU waste hierarchy was specifically appreciated.

Since November 2021, advocacy work has resulted in more ambitious inclusions in some key trade policies. For example, EEB worked with ECOS to target production processes that were the most harmful, polluting and hazardous for workers. The challenge is to ensure they become an integral part of the EU trade toolbox.

The team also worked well with partners like the Bureau Européen des Unions de Consommateurs (BEUC) to meet many times with the department working on policies within the European Commission to discuss the benefits to consumers of an ambitious Sustainable Products Policy Initiative. This collaboration put forward a compelling argument for policymakers on consumer rights.

Key achievements where the team's contribution is well evidenced - either through direct contributions or through effective partnerships to combine knowledge and expertise - are summarised in Table 12.

Table 12 Key achievements and evidence of contribution for Influencing EU Trade

Key achievement	Evidence of contribution
<p>The Waste Shipment Regulation is more ambitious than anticipated. The specifically ambitious detail in the policy is the outright ban of all waste exports to non-OECD countries and stricter obligations to monitor shipments to OECD countries.</p> <p>Strong alignment between three different parliamentary groups helped secure the more ambitious recommendations on waste shipment bans.</p>	<p>The EEB published several texts pushing for more ambitious regulations from Nov 2021 to May 2022. <i>“EEB’s specific contribution has been broadening out the waste shipment policy to other material waste streams by providing specific recommendations or amendments around specific safeguards that applied to all waste streams” - External Stakeholder</i></p> <p>Strong partnership work with organisations like ZWE, Reuse and ECOS, including the Rethink Plastic Alliance, has resulted in amendments in waste shipment policy that reflect EEB’s priorities.</p> <p>EEB worked with ECOS to target production processes that were the most harmful, polluting and hazardous for workers.</p>
<p>“Access to Justice” provisions are included in the Due Diligence proposal.</p> <p>While Due Diligence is still not as ambitious as EEB would like, it was critical to get social issues integrated into the proposal - and the wider EU trade toolbox - because they were omitted from product specific files like the EU Textile Strategy.</p>	<p><i>The “access to justice” provisions that are evident in the due diligence proposal can be linked to the work of the EEB who have pushed for environmental justice and liability for harms, and opportunities for redress. This is seen as a key success of the DD regulation and EEB is focusing on ensuring these don’t get diluted - External Stakeholder</i></p>
<p>Successful leverage of Consumer Empowerment to achieve Circular Economy goals in the Consumer Rights Directive and the Ecodesign policy.</p> <p>Strengthened consumer empowerment narratives on consumers being able to make fact-based sustainable product decisions helped the Sustainable Products Initiative achieve its goals. And the asks were ambitious, including labelling to signal longevity of a product and more rules on greenwashing. .</p>	<p><i>“EEB were close to the process and understood how the rules could be more ambitious.” - Internal Stakeholder</i></p> <p>EEB and BEUC were particularly strategic in highlighting the benefits to households (in terms of costs, quality products, better information to make budgetary decisions) to make the policy revisions more politically feasible and attractive:</p> <p><i>“The EEB/BEUC provided the right kind of information about the cost benefits for consumers, as well as advocating for the expansion of products covered by the regulation. ” - External Stakeholder</i></p>

2.4.3 System response

The progress made by the Advocacy Initiative is important, especially in the context of interviewees reflecting that environmental due diligence, especially on climate, was “almost impossible two years ago”. But it feels too early in the legislative process to expect much change to be evidenced (see Table 13 below). For example, achievements in the Waste Shipment Regulation are still tentative, even though the proposed amendments are rightly considered progress for this stage of the policy process:

“This could all still be lost during the negotiating phase, but at least it’s on the table to be discussed, because if it’s not on the table, there’s nothing that can be done.” - External Stakeholder

Overall it is evident that the team and its partners have been overpowered by the active push back from member states and industry. This tells us something about the “readiness” of the system to accept more regulation around the way business conducts itself. It also highlights an opportunity for greater civil society capacity building and campaigning to make regulations more politically palatable.

Table 13 Signals of resistance and change for Influencing EU Trade

Signals of resistance	Signals of change
<p>Delays in the Waste Shipment Regulation and Due Diligence Regulations.</p> <p>The delays in the policy files are considered to be the intentional consequences of intense lobbying. There have been imbalances between civil society power and industry power and tensions between horizontal rules and provisions which let member states set their own parameters.</p> <p>Member state push back on Due Diligence.</p> <p>Due Diligence measures can conflict with jurisdictional rights. There is another barrier in that 7 member states already have their own Due Diligence rules and are resistant to the EU having stronger regulations.</p> <p>Industry is pushing back.</p> <p>The sense is that industry does not actively say they are against Due Diligence as a complete package, but they focus efforts on diluting the strongest elements in the proposals.</p>	<p>Activity of national level NGOs.</p> <p>The team does have national NGOs to work with, who may have clearer ideas on why pushback is happening and from where it originates. Capacity building to work with Waste Shipment Regulation is happening.</p>

2.4.4 Rubrics assessment

Sophoi retrospectively conducted a baseline assessment for Laudes rubric B5 ([Exposure of harmful practices and thwarting of counter-lobby](#)) for Influencing EU trade. The evaluation team classified Influencing EU trade as “harmful” to reflect the absence of waste shipment regulations except for hazardous waste in both textiles and built environment alongside lack of due diligence legislation and EU rules on sustainability labelling. On the basis of the progress and systems response we’ve been able to source evidence for, the rubric has been reclassified as “unconductive”. A rationale is provided in [Annexe 6](#).

Table 14 Rubrics assessment for Influencing EU Trade

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022
B5 Exposure of harmful practices and thwarting of counter-lobby	B5.3 Influencing EU Trade by reflecting circular economy and sustainability principles, notably for textiles and materials used in construction sectors	Harmful	Unconductive

2.4.5 Future opportunities

Given that the Advocacy Initiative has progressed a lot of what it set out to do to influence EU trade, it is Sophoi’s assessment that this is a good juncture to review next steps, especially given the power of vested interests. The evidence suggests there is good reason to have confidence in the team’s ability to identify and unleash untapped potential in the interrelationships between policy files and between actors to make ambitious leaps forward.

These questions emerged through conversation and analysis.

- How can the Advocacy Initiative further apply the team’s unique skills and value-add to influence EU trade policy?
- What other mechanisms exist (e.g., the Generalised Scheme of Preferences, multilateralism, standards, targets, surveillance authorities in low-income countries) to insert social and environmental considerations into the trade of products?
- What opportunities exist to identify and leverage allies within the industry to support the crafting of politically palatable counter-arguments used by those with vested interests in maintaining the status quo?

2.5 Reinforced Network

2.5.1 Summary of progress

There is little doubt that the Advocacy Initiative has engaged with an effective network of partners across scales and across the environmental, social, and political landscape. Evidence of the team's effectiveness in networking is incredibly strong, including two highly functional task forces for textiles and buildings.

The team's strength in identifying and convening key players and technical experts to produce evidence-based policy decisions and compelling narratives is evident in comments from almost all stakeholders interviewed. As a result, the Advocacy Initiative has grown its network, evolved the network's capacity on policy and legislative process and diversified its structure.

The civil society power base could be bolstered through the inclusion of less represented voices in the Circular Economy ecosystem, including the recycling sector, the secondary materials sector, Small Medium Enterprises, trade unions, women's movements, youth organisations, and social development NGOs.

Strategising about where to prioritise the reinforcement of networks is an important next step, especially given current team capacity and the time investment required for effective relational work. work and elaboration of related shared projects (campaigns, advocacy, and research etc.)

2.5.2 Distance travelled

EEB's Rubrics Baseline assessment of "partially conducive" for Laudes rubric B6 ([Multi-stakeholder movement pressure](#)) reflects that in 2020 the team were already part of multi-stakeholder initiatives with industry on fashion and buildings, including the Textiles and Construction leadership groups, the EU Product Environmental Footprint group and World Green Building Council's Whole Life Carbon Campaign.

The evaluation team found more evidence on knowledge products than on projects at the global level. While links have been made with the African Circular Economy Network and the Indian Circular Economy network, the engagement has not evolved to the project implementation phase with secure capacity.

The indicators established at the Initiative inception in 2019 do not capture the achievements that have strengthened and broadened the Initiative network over the past two years (See Table 15 below). The creation of two task forces has also taken significant relational work and are reported to be rewarding spaces.

The team are highly effective networkers, who have the relational skills and capacities to create rewarding personal relationships, steward effective collaborations and lean into contentious issues with multi-stakeholder groups. They are considered "the go-to" organisation in Brussels for an open and diplomatic dialogue.

"I know The CE team is good at keeping an open dialogue with the industry side because sometimes it can be a bit "you're with us or against us" and if you are not with us you are part of the baddies and this is not at all the approach. We know we need to engage in a meaningful dialogue and find joint solutions and ultimately if we get certain industry players to make even instrumental changes this might have a bigger impact than targeting a smaller fish." - Internal Stakeholder

The team is also effective at knitting together policy departments within the EU commission. The evaluation team has seen evidence of email conversations pushing for more than one department to meet to evolve policy:

"The EEB sometimes provides a bridge between the different services" - Internal Stakeholder.

Examples include the integration of products into chemicals policy, the integration of the circular economy into EU Industrial Emissions Directive revisions, and the integration of the Circular Economy approach into agriculture policy with MAVA.

Table 15 Key achievements and evidence of contribution to Reinforced Network

Key achievement	Evidence of contribution
<p>The existing advocacy network has been successfully strengthened.</p> <p>The Advocacy Initiative has been successful in</p> <ul style="list-style-type: none"> - Strong working relationships with the World Green Building Council, Environmental Coalition on Standards, ECOS, BPIE, and Rethink Plastic Alliance. - Developing trusting relationships with counterparts in the European Commission, with MEPs in the European Parliament and DG FISMA (Financial Stability, Financial Services and Capital Markets Union) - Evolving the civil society networks and collaborations they are part of. 	<p>The team has a pragmatic diplomatic approach to their engagements – <i>"so long as we can have a useful conversation on some aspects of the landscape we're working on, we're in the conversation"</i>. - Internal Stakeholder</p> <p><i>"EEB is critical in bringing together key stakeholders as an 'endorsement base' inviting them to comment as well as providing the base with the relevant evidence to inform their decision making and positions"</i>- External Stakeholder</p>
<p>The creation of two well-functioning task forces in textiles and the built environment.</p> <p>The task forces have created multi-organisational teams, which catalyse action. For example, the built environment task force meets once a month. They work around common thematic documents</p> <p><i>"balancing what's operational and what's feasible for the independent organisations working in the group"</i> - External Stakeholder.</p>	<p><i>"There is a co-creation process where the EEB writes and develops policy briefs and position papers with countries and key experts"</i>. - Internal Stakeholder</p> <p>In the textiles working group, trusting relationships allow each organisation to be more efficient, because they can represent each other in meetings, they can echo each other when points need repeating, and they can problem-solve together</p> <p><i>"and also in terms of trust in terms of you can duplicate each other but also that we can discuss together when I'm really stuck on something. So, what do you think of, you know, how should we answer this? and we work it out together. I think that's been really, really, useful"</i>- Internal Stakeholder</p>

The existing advocacy network has been broadened.

The Advocacy Initiative has been successful in

- Growing and diversifying EEB membership, to include the first member from outside the EU
- Creating new relationships with policy makers and influences within the EU – e.g., the European Environmental Agency
- Joining new multi-stakeholder groups – e.g., the Sustainable Finance Taxonomy, the New Bauhaus, ENOUGH network, and the textiles leadership group on the circular economy platform
- Establishing new relationships with academia – especially post-growth and the [UK Manufacturing Symbiosis Network](#) +
- Working pragmatically with industry Extended Producer Responsibility representatives like the Policy Hub and FIEC
- Branching into civil society networks outside of the environmental movement (e.g., on social justice) through the due diligence advocacy, and doughnut economics campaign.

The team specifically seeks out organisations that can complement their own skill set, especially where robust technical knowledge is required or where voices outside the environmental NGO network are needed – e.g., human rights watch.

“The team are good at working internationally and this diversifies our membership so we can become an even more comprehensive umbrella network” - Internal Stakeholder

The team works intentionally to build 1:1 personal relationships with people in positions of influence. For example, the team got in contact with a staff group within the EU commission on Doughnut Economics via Kate Raworth. Over dinner, they got to know each other and now the team drafts emails for the working group to send out to 300 staff members. It works much better than if the message was to come directly from the EEB.

2.5.3 System response

Despite sound work on reinforced networks by the Advocacy Initiative these past two years, existing power structures are proving difficult to reorganise. Beyond the progress the Advocacy Initiative has made to strengthen and broaden its networks, there were not many clear signals that the networks are sufficiently reinforced so as to counteract current attempts to block and reverse policies favouring the transition to a circular economy.

A lot more work is required to upend current power relations and hegemony. For example, stakeholders felt that some players like the second-hand market – have a deep understanding of how Extended Producer Responsibility schemes for textiles could work but they are often overwhelmed by larger industry bodies when the rules and schemes are being decided upon.

In recognition that there are individuals within the industry and powerful institutions who are eager to buck the trend and be part of the solution, it was felt that network reinforcement has to be achieved through diplomatic channels, which centre on humanity, professional understanding and dignity.

Table 16 Signals of resistance and change for Reinforced Network

Signals of resistance	Signals of change
<p>Lack of legislative understanding limiting business and civil society momentum. There is a sense that businesses are talking the talk about moving toward circular business models, but the movement is slow because they are trying to educate themselves on legislation. This was also reported for civil society organisations – especially national-based organisations who aren’t yet aware of the implications of sufficiency legislation, for example.</p> <p>Limited funding for interdisciplinary projects. To echo how growth-based models are contingent on producing inequality between people – most notably according to race and gender – EEB’s funding models for research and policy also differentiate issues rather than connect them.</p> <p>Dominance of big brands and industry in discussions with the European Commission. Big brands and industry lobbies more broadly have the capacity to have permanent representation in Brussels and the capacity, resources and time to invest in discussions. Actors who have circular economy solutions – like the re-use and secondary markets – could be better represented.</p>	<p>Integrating wider perspectives in the EU policy process. The African Circular Economy Network is the first non-EU member of EEB, signalling that the implications of EU policy extend globally through supply chain systems.</p>

2.5.4 Rubrics assessment

To reflect what the evaluation team was able to evidence from distance travelled and system response, the rubrics assessment shows no change. Despite significant evidence that the Advocacy Initiative is evolving networks, the nature of multi-stakeholder movements is still only partially conducive to creating the pressure required to facilitate a Circular Economy transition. A rationale is provided in [Annexe 6](#).

Table 17 Rubrics assessment for Reinforced Network

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022
B6 Unstoppable multi-stakeholder movements creating pressure	Reinforced network with implementing partners on Circular Economy	Partly conducive	Partly conducive

2.5.5 Future opportunities

Stakeholders in this evaluation were clear that some forward momentum could be gained through capacity building on the legislation, funding for interdisciplinary projects and further investment in the diversification of the network.

It’s Sophoi’s observation that the relational work the team undertakes is highly effective and time-consuming. It feels like a useful juncture to take stock and reflect on where priorities for future network reinforcement should be.

Most of the issues and concerns that energised interviewees were around increasing the diversity of the network to hone policy messaging and exert pressure:

- How might the Advocacy Initiative allow forward-thinking businesses to be part of the policy solution?
- How might the Advocacy Initiative engage the voices on the periphery of circular economy policy development? These voices include the recycling sector, the secondary materials sector, Small Medium Enterprises, trade unions, women's movements, youth organisations, and social development NGOs.
- How might the Advocacy Initiative go about securing funding for intersectional projects when the funding landscape for holistic, interdisciplinary work that combines environment, social justice and the economy is not strong?

Section 3: Evidencing Initiative Quality

3.1 Design

3.1.1 Summary

The design of the Advocacy Initiative is considered **conductive and supportive** (see Table 18) because it has been well conceptualised, developed, adapted and refined over time. There is also evidence of needing to tweak the design when necessary, for example, on EU trade. The design is struggling to reach the most vulnerable especially young people, women, low income (i.e. housing insecure), and marginalised actors in supply chain systems in the global south.

Despite increasing resourcing within the team to deal with new policy directions, the Advocacy Initiative design is rightly (for a transformative agenda) systemic and complex, covering a lot of interrelated policy and communication touchpoints. This makes the design hungry for additional capacity, but as evaluators, the team cannot see that one element is more critical than the other. Rather, each element reinforces the other.

Table 18 Rubric assessment for the Advocacy Initiative Design

Rubric	Quality pillar	Quality Outcomes	June 2022
A1	Design Design addresses the important issues / needs.	<ol style="list-style-type: none"> 1. Coherence of the ToC / five-pillar strategy for intended impact. 2. A blend of intensity and consistency to achieve the intended impact. 3. The functionality of institutions and external events / trends visible in design. 4. Strength of partner selection & diversity 	Conductive and supportive

The evaluation team looked at the evidence the evaluation team collated against each of the quality outcomes under design below.

3.1.2 Coherence of the Initiative Design

The intention to bring the sustainable products, fiscal, narrative, trade and network pillars together is coherent and reflects EEB's appreciation of the limits of a single piece of legislation to shift behaviour without coordinating efforts. For example, the transition to end-of-life management is going to be easier with products that are designed to be dismantled, reused and recycled more easily.

The integrated nature of the Advocacy Initiative design was valued by internal and external stakeholders alike. It aligns well with Laudes' system-wide theory of change. And it provides reassurance to staff and partners because it allows them to see how their work is fitting together with other strategic interventions:

“The EEB is calling for complementary actions around the product standard, so it is situated within an ecosystem of other supportive action. Their strategy is about making sure there's enough support to propel the policy and create an enabling environment”. - External Stakeholder

The evaluation team saw positive feedback loops between different elements of the Advocacy Initiative design. For example, Sustainable Products and Materials are bolstered by New Consumption Narratives. The evaluation team traced a causal link between investing in narratives

and building relationships with people who become allies, and a positive feedback loop between investing in narratives and policy adoption:

"The way politics are done: people need a story. Politicians need to have a story to explain why they are doing what they are doing and we need to give them that easy story. And it takes a lot of effort. There is still room to grow from churning out complicated policy positions into making something light, playful and engaging - so the politicians are engaged and feel they have something to say on Twitter or Tik Tok. And this is just the entry point. We then need to give them the policy briefs and the details of what they need to be doing" - Internal Stakeholder.

The challenge resides in the team's capacity to respond to all the opportunities on policies and design campaigns. The quote also implicitly points to a group that is not so often reached by the Advocacy Initiative - young people. They get less of their news through broadcast but they are a power base with vested interests in the circular economy - and where most [changes to consumption habits](#) in fashion and [interior design](#) are happening.

3.1.3 A blend of intensity and consistency to achieve intended impact

Interviewees conveyed an awareness of the team's ability to lean in when required and retreat when the policy process is proving sticky. For example, one external stakeholder reflected that EEB is "an efficient organisation", knowing "when to drop a subject that does not have traction".

Tangible examples include the realisation that de-growth is not politically palatable yet. The interviewee was keen to point out that this hadn't prevented progress. EEB found other ways - either utilising other narrative tools (e.g. the Wellbeing Economy), opportunities that presented themselves (e.g. the crisis in Ukraine) or other initiatives (e.g. urban planning and the renovation wave).

Balancing ambition with pragmatism was also highlighted as a strong area which enables the team to keep forward momentum:

"EEB balance being pragmatic and promoting an ambitious vision to work towards. They tend to set a broad framework to push in a specific direction." - External Stakeholder.

One of the most difficult arenas of Initiative design to navigate is policy delays - knowing how to pivot and effectively deploy resources is sometimes a challenge. For example, on files on products and textiles the team used the time during delay periods to drum up support for agreement within the European Commission given the diverging opinions across the different 'services' about the final text. However, with Corporate Sustainability Due Diligence, a question was posed about whether more could have been achieved in the policy delay through parallel campaigning and other tactics.

3.1.4 The functionality of institutions and external events / trends visible in design

The team were agile during COVID-19, notably reinforcing links with national partners and MEPs. This resulted in greater collaboration with partners to commission studies and to share intelligence on policy strategy.

To a great extent, the Advocacy Initiative is beholden to the legislative processes of the European Commission, the Parliament and the Council. At each stage, advocacy gains could be weakened, affecting the network and relationships the Advocacy Initiative has to build. These realities require a dynamic relationship to the Initiative Design, so the team can use different tactics depending on the

stage of the policy process.

"They have to be [changeable] because you cannot replicate the same formula. We're about affecting change and influencing policy, but sometimes you are better not targeting the policy people directly because there is so much noise around them you might not get through... but if you can find some power levers - for example, at the national level, using constituents on the ground, go through journalists, have a press bang, rally support of other Civil Society Organisations so we command the necessary respect to be heard and our concerns are taken into consideration. And the tactic you choose depends on who we're talking with, what kind of stakeholders we already have, what sort of network we have to mobilise". - Internal Stakeholder.

The EEB process of rating the Parliament after it has ended keeps the functionality of the institutional environment front-and-centre.

3.1.5 Strength of partner selection and diversity

The team is good at selecting partners and building relationships with them, especially to drive efficiencies through evidence generation and policy work. They are good at identifying allies within the EU Commission and Parliament, who they foster strong relationships with, often so that they become the internal spokesperson for issues the Initiative is advocating for (e.g. sufficiency or doughnut economics). There are similar possibilities for technical specialists to identify allies within the industry to help foresee market implications of specific policy files.

The team is sensitive to whose voices are and are not centred in the policy dialogues, and there was concern among interviewees internal and external to EEB that more could be done to diversify the current profile of partners, including the recycling sector, the secondary materials sector, Small Medium Enterprises, trade unions, women's movements, youth organisations, and social development NGOs.

New connections will require that reciprocal relationships are built and it's Sophoi's interpretation that there is not enough capacity in the team to do this when they're already overstretched while also keeping existing collaborations rewarding and functional.

3.2 Implementation

3.2.1 Summary

The implementation of the Advocacy Initiative is considered **conductive and supportive** (see Table 19) because it has been implemented with good efficiency, thoroughness, professionalism, and consistency with relevant legal and professional standards. It uses effective strategies and is experimenting to navigate constraints and resistance where required.

There are opportunities to strengthen the capacity of stakeholders - especially national NGOs and civil society organisations who work on social issues but remain disconnected from policy developments.

Table 19 Rubric assessment for Implementation

Rubric	Quality pillar	Quality Outcome	June 2022
A2	Implementation Implementation is inclusive, enabling, empowering, and capacity-enhancing.	<ol style="list-style-type: none"> 1. Focus and clarity of implementation path 2. Agility and responsiveness to opportunities 3. Feasibility of real-world tactics used 4. Capacity building of partners and individuals, including marginalised 	Conductive and supportive

3.2.2 Focus and clarity of implementation path

There were different levels of strategic clarity about focus and implementation. It was encouraging to hear partners, for example in task forces, that they are clear on the implementation path. For example, ECOS and ECODES were very clear on the approach that is being taken to drive awareness, understanding and adoption of sufficiency:

1. Provide the Evidence
2. Create the Framework for discussions
3. Disseminate - in webinars, discussions etc

Equally, members of the building's task force were clear about the process for raising awareness and ambition for the Energy Performance Buildings Directive. An open letter on ministerial changes is to be followed by an infographic that introduces the Directive and how it can be achieved, followed by a sequence of meetings with members of the EU parliament and work on a list of amendments to be discussed with political groups in different committees.

In textiles, where there was no starting policy framework, the process has been more emergent. The writing of the Wellbeing Wardrobe report enabled EEB and partners to map out the whole system - and now they are working on priority areas in more detail. Stakeholders reported they are hungry for "what's next" to interpret and implement the findings, reflecting their engagement in the work.

What comes through strongly, and is often overlooked by some activist NGOs in their approach, is clarity about the nature of engagement for transformative change. It is a [continual living process](#) - a sequence of conversations that evolve through time and different arenas, including the informal "[shadow spaces](#)" of 1:1 conversations over dinner.

3.2.3 Agility and responsiveness to opportunities

As an organisation, EEB was affectionately described as "a dinosaur" given its vast scope of work, being long established in the policy landscape, but also the pace at which it moves. It's not agile enough to influence fast-moving parts of the ecosystem like financial markets. However, it is able to move around and between services within the commission much quicker:

"EEB are able to produce and source data more rapidly, flexibly and creatively, without the same bureaucracy." - External Stakeholder

Part of the Advocacy Initiative's agility comes from its active member base. As one external stakeholder pointed out:

"EEB is very good at doing this [applying high pressure in Brussels] because they have such an activated member base and when things need to happen it's really clear that they can relay all the information upwards and downwards". - External Stakeholder

The evaluation team were able to evidence examples where the Advocacy Initiative was very agile, anticipating and creating opportunities and responding to them when they arose. One example of responding to an opportunity on the geopolitical landscape was the crisis in Ukraine. The team put out early statements and took advantage of the energy transition rhetoric that followed.

Compared to textiles and fast fashion, circularity and sufficiency was less of a "hot topic" in the social consciousness of the EU public. The European energy crisis surrounding the situation in Ukraine has created an opportunity for the narrative of sufficiency. EEB had to move fast. They first published an [article](#) about Ukraine and Energy on 24th February 2022, with [another](#) on 4th March 2022 and [another](#) on 18th March 2022. The Green's [campaign](#) was published on 26th March 2022 and EEB posted another [official statement](#) on 5th May 2022. An external stakeholder reported it like this:

"EEB have taken advantage of the energy independence debate since war has broken out, broadening out the frame of conversation to material independence, circularity, energy efficiency and climate objectives, latching on to the narrative around [energy] self-reliance." - External Stakeholder

The team also responded to opportunities to integrate their work into other policy files - for example, the integration of sustainable products into chemicals policy, the integration of circular economy into EU Industrial Emissions Directive revisions, and integration of Circular Economy approach into agriculture policy with MAVA.

Overall, there was an awareness of the need to balance overall strategy with the flexibility to respond to shifting contexts. In particular, the team appeared fast to respond to statements or when information was leaked about amendments or the direction of travel of a policy.

3.2.4 Feasibility of real-world tactics used

EEB are very highly regarded for how they go about their work. One stakeholder praised the utility of EEB's policy solutions, saying, "The best lobbyists are those that give you something to use". They went on to explain that:

"the EEB combine strong knowledge and deep relationships with officials. They are particularly good at sharing data and have a great capacity to align with better or more relevant expertise when it is necessary" - External Stakeholder.

Diplomacy is part of their DNA. As individuals, they are also passionate and inspirational. Accustomed to leaning into complexity and misalignments, they value relationships and relational processes and are rewarded with people's trust and commitment.

"It's about providing the right arguments, providing the right tools, expertise to allow policymakers to make decisions and come up with concrete proposals with ammunition for them. And this is something that I feel EEB is doing because each time I speak with them, they have a lot of ideas. They put themselves in the shoes of the people who have to write the law. That's the best influence when you to speak to [a policymaker]." - External Stakeholder

In large part, the Advocacy Initiative's opportunities to deploy tactics cluster around key stages of the policy making process. Policies generally move through the Commission, the Parliament and the Council, with each transition creating opportunities for delays to happen and gains to be won or lost. To win, the team has to advocate:

- **pre-EU Commission proposal phase**, working on preparatory steps, directions to improve, and first stakeholders consultations. Often this phase involves anticipating proposals and influencing decisions ahead of time.
- **policy development phase**, working to inform discussion of text by EU institutions to secure advances, increase ambition and sustain momentum.
- **implementation and evaluation phase**, working on post-adoption in the EU Official Journal through transposition, application and monitoring to critique, plug gaps and shape implementation...until the next review cycle.

In the pre-EU Commission proposal phase the Initiative is experimenting with different leverage points, for example through communications stunts which encourage policy makers into a discussion. If this is a sustained direction of travel, then more resources will be required (eg., actors, interviewers, website designers, website builders, press officers, coordinators) to pull off high quality events that capture the attention of influencers within the Commission and Parliament. In the 'policy development phase' stage the team often switches between the formal and the informal. When rumours circle about backsliding, it's not possible to release a formal statement. Instead, they use their networks and relationships to influence. Implementation and evaluation phase, like with the Textile Strategy, work gets underway to translate goals in proposals into specific actions stakeholders can take.

3.2.5 Capacity building of partners and individuals, including marginalised

We found less evidence on the capacity building outcome area. There were examples of the team supporting national-level NGOs' understanding and advocating for more ambition in policy files. And examples of capacity building around media toolkits to extend reach.

The Advocacy Initiative seems to be particularly skilled at holding the negotiation processes together, enabling different groups to learn from each other's priorities and find common ground. This is an important element of capacity building for collective action, which is not always strong in civil society. The usual tendency is to gather together on a defined goal everyone can agree on (e.g.,

removing Trump from power) but then movements fragment into the priorities of different groups again. The details of different agendas never get discussed, and the opportunities for social alignment are missed.

3.3 Monitoring and adaptation

3.3.1 Summary

The monitoring and adaptation of the Advocacy Initiative are considered **partially conducive** (see Table 20) because the support grant is well monitored, and some tools are being implemented to monitor communications. The evaluation team identified some opportunities to strengthen monitoring and review what evidence and learning practices would be useful to the Initiative.

Table 20 Rubric assessment for monitoring and adaptation

Rubric	Quality pillar	Quality Outcome	June 2022
A3	Monitoring and adaptation Monitoring informs sound adaptive management	1. Quality of reporting 2. Use of evidence for decision-making (mix, triangulation, theory-building) 3. Integration of contextual changes into decision-making 4. Quality of sensemaking practice	Partly conducive

3.3.2 Quality of reporting

On the whole, it the evaluation team's sense that the Initiative's reporting does the job of conveying what has happened in the grant period. There is scope for the reporting to capture:

- Moments of change - many of the significant moments of change happen in dialogue with people and in shared moments, which build on each other to create pathways towards objectives. These moments are often confidential in nature, so it is tricky to capture, but some assessment of how many meetings moved stakeholders in the room and how, might be useful - e.g. did the interaction raise levels of awareness? deepen understanding? create alignment? and build individual and collective agency to act?
- Link communication monitoring to strategic goals - for the moment, the team tracks when EEB and policymakers are referred to in media, but the monitoring does not link back to project objectives. It would be a small but significant improvement to link communication hits directly back to objectives so progress on communications can more meaningfully inform strategy.

An area identified by EEB for capacity building is in measuring narrative uptake and change, and this will require a significant time investment to learn about emergent practice in the field and adapt it to the Initiative.

3.3.3 Use of evidence for decision-making

The evaluation team didn't surface many examples of the Initiative using evidence for decision-making. For example, there is no practice of regularly reviewing the theory of change, bringing lots of evidence to bear on the progress that has been made and the steps that should be taken yet.

That said, the use of evidence for decision-making was implicit in the conversations the evaluation team had, suggesting it's fairly fundamental to how the team works. For example, so much of the

EEB's work is reactive and strategically optimistic, requiring that decisions are continually made about where to invest energy and resources. The Advocacy Initiative also uses evidence-based decision-making in its advocacy. Interviewees mentioned how EEB brings stakeholders together to inform positions on policy files. This often involves reviewing evidence to decide on the best way forward:

"EEB relies on scientific evidence to drive change as well as translating the evidence in the right way. The way to think about creating a viable political narrative takes technical skill, in contextualising data and crafting a narrative around it" - Internal Stakeholder.

Other key junctures include policy reviews, where the team reviews files and their implications, which go on to inform strategy.

There are some examples of regular (vs ad-hoc) reviews. Communications have begun quarterly meetings where the communications and policy colleagues take stock and prioritise the communication landscape for the weeks ahead. Also, the EEB has an established practice of reviewing and rating outgoing presidencies according to how well they have performed across 10 strategic areas. This creates the opportunity to use evidence to inform the next steps.

3.3.4 Integration of contextual changes into decision-making

There is evidence in the grant reports that COVID-19 affected the way EEB could approach their work. They boosted their skills to organise remote meetings. This was easier in later stages of policy development than before proposals were reported and debate at national levels had begun.

More fundamentally, the pandemic did not trigger the 'reset' in thinking EEB had hoped for and the restrictions made it harder to catch the attention of decision-makers beyond what confirmed their previously held positions. The use of more playful communication stunts to draw key influencers and messengers into issues is possibly an innovation borne out of this frustration and limitation.

Other challenges are on the horizon which may affect how the Advocacy Initiative works. The Sustainable Product Initiative is moving to a new Directorate General in the EU which is significant because it will mean different stakeholder communities, who may be reluctant to listen to or understand the language in which things are communicated. It's not clear how much this will affect the work of the Advocacy Initiative.

3.3.5 Quality of sensemaking practice

The "emerging lessons learned" section of the grant monitoring reports is an opportunity for the team to integrate their experience with their goals to consider what they do next. There is a high degree of self-reflexivity in the way lessons learned are reported, although the evaluation team cannot be sure how collaborative and inclusive the process is to arrive at these insights.

Over the course of the evaluation team's engagement with stakeholders, Sophoi were struck by how passionate people are - both with the work of EEB and its goals. A couple were specifically interested in being part of this Learning session. They can see the value of multi-stakeholder sensemaking, especially for movement building. By investing time appreciating the wins and losses together, sensemaking allows collectives to appreciate the individual experience and distribute responsibilities more efficiently, according to where strengths and strategic relationships are in the network.

3.4 Communication and Learning

3.4.1 Summary

The Communication and Learning of the Advocacy Initiative is considered **conductive and supportive** (see Table 21) because EEB is very open and keen to learn to take their work to the next level. Communication with external audiences - partners, the Commission, civil society, and industry - is excellent and the team work hard to align external messaging in complex and contested spaces.

Table 21 Rubric assessment for communication and learning

Rubric	Quality pillar	Quality Outcome	June 2022
A4	Communication and learning Communication promotes internal and external collective learning	<ol style="list-style-type: none"> 1. The credibility of EEB as a campaign leader amongst key audiences 2. Well-aligned external messaging 3. Relevant audiences are encouraged to reflect on the solution and their role in supporting it 4. Decision-makers who can overcome the opposition are encouraged to reflect 	Conductive and supportive

3.4.2 Credibility of EEB as a campaign leader amongst key audiences

EEB have credibility with a diverse group of stakeholders and key audiences. The team’s technical expertise and persistence within and beyond the specific parameters of the funded Advocacy Initiative are considered a valuable contribution to the ecosystem of actors working towards a circular EU economy.

The Initiative’s work is referenced by the European Environment Agency, they have the trust of key influencers and academics, and they are thought of as experts that actors in the ecosystem can rely on:

"I have heard people within the commission that they trust the EEB a lot for what they represent and what they bring to the table." - External Stakeholder

The evaluation team have seen confidential email exchanges which show the value members the team brings to colleagues and staff within the commission. They are consistently excellent when it comes to policy work, and this helps build credibility.

There is scope to refine campaign approaches to reach young people and other marginalised groups - exploring both modes and channels of communication.

3.4.3 Well-aligned external messaging

The Advocacy Initiative team work hard to align external messaging with partners - even if this involves a series of discussions to find common ground.

"There is an echoing of messaging between EEB and their partners in meetings and webinars. They talk before big engagements and align positions and decide who will push which agenda item and when to echo each other." - External Stakeholder

The EEB also has an important role to play in the ecosystem of staking a claim for an ambitious future, and this is not something all their partners are at liberty to do.

"EEB is unique in that they're not pushing a specific category, they haven't picked a specific topic like SMEs or urbanism, EEB is looking broadly and holistically at the whole CE spectrum. They're also pushier than other organisations on the 'green' file. They are the loudest and push the furthest. Given the nature of EEB as an independent organisation, they have more licence to push the boundaries and can be quite radical." - External Stakeholder

Overall, it is Sophoi's impression that the team wields its credibility carefully – typically knowing when to push and when to listen. This, in part, comes down to knowing their goals and which lines are non-negotiable, alongside where they need partners to complement their own knowledge and technical skills.

3.4.4 Relevant audiences being encouraged to reflect on the solution and their role in supporting it

It's the evaluation team's observation that EEB welcomes with open arms anyone who has the energy to work on the goals the Advocacy Initiative prioritises. The building's task force encourages distributed responsibility for tasks, reinforcing the idea that all actors have a role in supporting the solution. It was described as a network rather than an "umbrella" with EEB carrying the umbrella.

The place where the Advocacy Initiative could add the great value to the whole policy-making process is the integration of social issues into the transition to a circular economy. For example, there is a broad suite of tools that are available to encourage actors to reflect on the social and environmental case for policies and investments, including

- [Equality impact assessments](#), which allow advocates to look at all the potential socio-economic risks of an environmental policy including mitigating steps by different stakeholders. This would add nuance to policies, integrating the social into the environmental more explicitly.
- [Social Return on Investment tools](#) that make the fiscal case for a policy designed to accrue a lot of environmental and social value. There is a precedent of these tools being used in the commissioning of the built environment - so the value is created, and investment is inwardly irrigated into communities locally through the building process.
- [Natural Capital Protocols and Social and Human Capital Protocols](#) enable organisations to explore their interdependencies with nature, people and society. It could be applied to the EU commission and its legislative frameworks.

3.4.5 Decision-makers who can overcome the opposition being encouraged to reflect

The Advocacy Initiative does a good job at moving around the relational system as policies through the Commission, Parliament and the Council.

Bilateral meetings work well within the European Commission. When regulation moves to the Parliament and Council, the EEB shifts focus towards rapporteurs, engaging in discussion prior to the launch of specific proposals. They find that MEPs are often overwhelmed with demands from civil society and industrial lobbies, so it can be more effective to focus on MEP advisors who then translate or communicate a position to the MEPs.

The Council level is much more challenging. There is little transparency, and documents are often published after decisions are made, and there is a higher chance that policies are further diluted or rejected outright. EEB is trying to influence the process by ensuring holistic support through national members. For example, the building's task force is working on 'base documents' which identify the strategic goals and then look at how to impact those goals at different scales of governance, including what tools are necessary - e.g., good practices for local governments to advocate at the town hall level.

3.5 Organisation and network capacity

3.5.1 Summary

The communication and learning of the Advocacy Initiative is considered **conductive and supportive** (see Table 22) because the Advocacy Initiative has a clear strategy, excellent leadership, a wonderful team culture, and an excellent collection of staff with the great job-role fit. The main challenge areas are capacity - both human and financial.

Table 22 Rubric assessment for organisation and network capacity

Rubric	Quality pillar	Quality Outcome	June 2022
A5	Organisation and network capacity Capability and capacity to deliver on outcomes	1. Strong person-job fit 2. Financial stability 3. Fundraising capacity 4. Inclusive learning culture	Conductive and supportive

3.5.2 Strong person-job fit

The team is incredibly strong technically. Their ability to navigate the intricacies of policy and think outside the box is highly sought after across a lot of different policy files. And this is because the evaluation team see they add value to almost every process and workstream they touch.

"The team is doing great work on policy integration - looking at how the different policy topics we work on are interconnected throughout the EEB thereby amplifying our work and making the links clearer to the membership - It's a great example of how we should work." - Internal Stakeholder

The membership is attracted to the work of the team, and the hiring of campaigning expertise into the team has worked well to coordinate messaging across the network.

The team also has the right mindset for working with resistance. They are positive and determined and it seems as though diplomacy is part of their DNA. They approach relationships very pragmatically and constructively, especially with those who don't share the same policy positions. A team member reflects:

"I think we manage it by being constructive. And you know, in the case of textiles, we need the industry on board. We have to you know, get the buy-in and everything but also be frank about what we don't want to be - for example, used by anyone to give them some sort of NGO or green credentials, which is a form of greenwashing." - Internal Stakeholder

The concern from the outside looking in is that the team is overstretched. If this continues, the risk is that individuals will [end up exhausted and burnt out](#). Organisations that follow a Good Jobs Strategy [operate with slack](#) by staffing their teams with more hours of labour than the expected workload in order to meet unexpected demands. In the NGO world, operating with slack is often considered a luxury but it drives performance on initiatives that require persistent effort and space for reflection

to pivot and course correct. Advocacy work is a marathon, not a sprint. It requires stamina. In this context, [self-care is a political act](#) which needs resources.

3.5.3 Financial stability

The team requires flexibility in its use of budgets because of the changeable intensity of the policy work - and the ability to foresee where capacity will be required. For example, they hired more technical support for the Due Diligence work and have bolstered communications support for policy officers. The EEB is also efficient in sharing resources across different organisations where pragmatic, as is common in the NGO community.

In terms of future funding, the concerns are real. Funders of NGOs tend to be less interested in technocratic work, and the EU tend to fund less of the work to shift consumption narratives and current economic paradigms,

"We can sometimes use project funding to work on other economic models, but it is a bit of a stretch" - Internal Stakeholder

MAVA will stop granting soon. If the team were to lose Laudes funding it would likely prevent the work on circular economy from continuing, at least in its current ambitious form.

It's the evaluation team's assessment that the next phase of work the team is embarking on builds on years of effort to advocate for concrete and significant circular economy policies in Europe. The last six months have seen significant policy shifts which will change the energy in the economic system, and has the potential to now truly make a transition. If the EEB are to continue their momentum, they need to be able to support a wider variety of organisations within member states to enact and enforce new hard-won policy gains.

3.5.4 Fundraising capacity

The team works closely with memberships and communications on fundraising strategy. They strategise and review proposals for new project ideas. Also, the team is in the habit of thinking about its members and seeing opportunities how to involve them in proposals.

The team has demonstrated its ability to get funding from other sources over the course of the grant, though this amounts to less than half of the funding provided by the Laudes Foundation.

The team is particularly good at appealing to the interests of EEB's members and bringing new members into the network.

3.5.5 Inclusive learning culture

The team works very well together. They are supportive, encouraging and good friends. They are encouraged to experiment and learn in an open way. The team values the stewardship it receives from its leaders, as well as the autonomy individuals, get to lead their own work areas.

The team is supported by an organisation that is reflexive. Currently, they are actively working on their governance structures to be more nimble and attract the younger generation of civil society actors, they are refining their equality and diversity policies and running training with the German consultancy [Joyn-Coop](#) to support senior managers with the organisation's rapid growth and leadership approach for hybrid working.

Section 4: Insights and Learning

4. Insights from the Advocacy Initiative's Learning Session

On 21st June 2022, EEB gathered with Laudes and Sophoi for the day. Together, implementer, funder and evaluator worked through the evidence in this report, reflecting on their own experiences and expertise, to collectively analyse the findings and their implications for adaptive management.

The main insights and learning are detailed in Table 23. Through plenary discussion the group examined the implications of the insights and learning for future opportunities.

The Initiative team were keen to use action points in future funding proposals and Laudes Foundation were interested to see how they could strengthen their support of EEB and the ecosystem more broadly. The main take-away points are summarised below:

- 1. Just transition** - The evaluation confirmed what was already known by Initiative staff: socio-economic issues are difficult to integrate into the circular economy transition. This is worrying and urgent for individuals within EEB, requiring capacity and alignment between civil society actors and diversification of voices in the Initiative Advocacy. One key aspect of the Just Transition which is a priority area for the Laudes Foundation is the socio-economic consequences of reduced consumption in Europe, while many interviewees talked about the ramifications of energy performance directives on those who rent their homes as well as the cost of sustainably procured clothing for people not earning enough.

It is Sophoi's assessment that an intersectional agenda needs to be developed collaboratively and groups who have not traditionally had a voice in policy fora will need financial support to invest their time and expertise. Funding multi-sector civil society engagement processes could be a priority action for Laudes foundation.

- 2. Building out the network** - The evaluation highlighted the skillful relationship building and diplomacy of the Initiative team alongside the potential that resides in diversifying the power base. The Initiative team is interested to work with SME's, trade unions, the repair and reuse communities, and national-level civil society groups. Through conversation the group began to identify networks they could link directly to, including into trade unions and national-level grantees funded by the Laudes foundation.

If the Laudes foundation were able to leverage some of their relational capital to broker relationships between the Advocacy Initiative team and other grantees, this may accelerate the network building process.

- 3. Measuring impact** - The evaluation identified how more could be done to explain how the Initiative responds to delays and systematically collect data on the outcomes it has created. There was an in-depth conversation about the use and value of anecdotal evidence, when systematically collected across time, especially to identify critical tipping points, intervention points and pressure points as well as challenges and delays. The conversation also promoted social alignment on the use of rubrics and the need for rubrics assessments to combine progress made with information about how the system has responded, in order to accurately make sense of what 'good' looks like.

It is Sophoi's assessment that Laudes foundation could share with grantees how data from different grants is combined to create an overall picture of progress towards a circular economy. This would make it easier for individual organisations to make sense of rubrics and use them well.

Table 23 Key themes, insight and future opportunities emerging in the Advocacy Initiative Learning Session

Theme	Insight and learning	Future opportunities
1. Just Transition	<p>1.1 Social dimensions. The evaluation confirmed what was already known among the Initiative’s staff – the integration of socio-economic issues into the circular economy transition has been a challenge.</p> <p>1.2 Practical limitations on embedding social criteria in EC policy discussions. The legislative context on environmental policies is not well set up to receive advocacy on social issues. For example, the circular economy policy file is now under DG Environment, which may be less adept at integrating the social implications of environmental issues, given their mandate on the environment specifically.</p> <p>1.3 Need for capacity and alignment. It is difficult for civil society to work in an interdisciplinary way because the different groups have a limited understanding of the issues they each advocate for. For example, civil society working on social issues has a surface level understanding of the circular economy and civil society working on environmental issues has a surface level understanding of the issues affecting female entrepreneurs in India or Bangladesh.</p> <p>1.4 Diversifying the voices of the Initiative Advocacy The intersectional implications are not considered in a lot of circular economy policy, at the expense of social justice and social factors being integrated across policies. This encompasses the inclusion of different income groups, races, genders and religions as well as consideration of local socio-economic disparities (e.g. fuel poverty within EU member states) and global socio-economic disparities (e.g., the livelihoods of people in emerging economies).</p>	<ul style="list-style-type: none"> ● An engagement and advocacy plan which works more intentionally with interdisciplinarity and intersectionality. This plan could consider how EEB and their partner dialogue will need to be structured through five key stages: <ul style="list-style-type: none"> a) Trust building b) Awareness raising c) Deepening understanding d) Developing capacities to act e) Collective action <p>Any intersectional agenda would need to be collaboratively developed with groups who have not traditionally have a voice or positions of power in policy fora.</p> <ul style="list-style-type: none"> ● A side-discussion explored the possibility of a literature review to identify policy suggestions on how to deal with the socio-economic consequences of reduced consumption in Europe.
2. Building out the network	<p>2.1 Prioritising efforts across the Initiative network. We had a very useful exploration of a critical tension that exists in movement building between widening the power base and diluting the policy ask. At times it is better to be able to advocate from a strong and diverse network, because it creates political will. At other times, an ambitious policy ask that is less well aligned across different actors in the ecosystem is useful to widen the Overton Window. It is about being clear about the objective and generating an approach, which focuses on when different stakeholders come together to achieve the goals.</p> <p>2.2 Creating alliances with trade unions.</p>	<ul style="list-style-type: none"> ● Being aware of this critical tension should allow the Advocacy Initiative to work more intentionally to connect its objectives to its approach and inform reporting against future grants. ● The EEB work with a variety of the stakeholder groups that have not yet been engaged in the Initiative and could leverage existing contacts in other files to diversify the network engaged in circular economy work. ● Working directly with national housing networks on sufficiency and social impact of buildings legislation.

	<p>In previous attempts to engage with trade unions, EEB has not felt “legitimate” with this group. This is hindering circular economy policies that integrate a just transition. In textiles, there is interest in working with global trade unions within the industry. On new consumption narratives, there is interest in engaging with trade unions about a beyond-growth paradigm.</p> <p>2.3 Broadening in-country support and capacity Member states are critical actors in achieving a circular economy, both in terms of their capacity to counter-lobby EU policy and in its implementation. For the next phase of advocacy, people could see the value of working with civil society networks working within countries to influence the national-level adoption of EU policies.</p> <p>2.4 Working with SMEs. It has always been hard for EEB to feel legitimate in their engagement with SMEs. They are mostly concerned with policy not making things harder for them to do business, and few opportunities currently exist to explore the transition through their eyes and the benefits it may bring.</p> <p>2.5 Going beyond recycling to consider the repair and reuse community. The evaluation team identified a need to uplift the power and influence of the recycling community in policy debates on textiles and the built environment. Evaluation discussions revealed that a higher leverage point for change is to reinforce the repair and reuse community in the policy process because the recycling lobby is not necessarily supportive of lower consumption in the same way.</p>	<ul style="list-style-type: none"> • Laudes fund trade unions, so the foundation could leverage its political capital with both groups of stakeholders to open a process of dialogue and engagement. • Laudes also grant to national NGOs working on the built environment and textiles. This network could be leveraged by EEB to consider fundraising for networks as a legitimate activity of the Advocacy Initiative. • The Advocacy Initiative could leverage EEB’s ongoing work with the Economy for Common Good network to engage with SMEs. • Identify civil society and business partners higher up the waste hierarchy to engage in the policy process.
3. Measuring impact	<p>3.1 Responding to policy delays. The Initiative team reflected that more could be done to explain how the Initiative responds to delays and the outcomes it created.</p> <p>3.2 Using anecdotal evidence. Change pathways can be influenced by new relationships and new conversations. Sometimes a single interaction can shift the system and it would be interesting to include anecdotal evidence more systematically in how the Initiative captures outcomes and impact.</p> <p>3.3 Developing sensemaking practice and use of rubrics. The Initiative team had a lot more clarity at the end of the Learning session about rubrics – what they seek to capture, how to report against them and track distance travelled. Sophoi had a lengthy discussion about how to situate results and progress within context without conducting a rapid review of the wider system each time. Laudes are interested in EEB’s interpretation of how the system is responding and changing. The Initiative team felt they could have a go</p>	<ul style="list-style-type: none"> • It could be useful to create a template to reflect on policy days and the action they prompt. For example: <i>What did we do? What did that enable? Who is acting differently as a result? How does this lead to progress against the pillars and rubrics?</i> • A simple template can be used to capture stories and anecdotes. This can feed an excel spreadsheet where they are collated. Producing stories frequently will enable regular sensemaking about what’s working and why. These points of reflection can be used to course correct and gain clarity on future strategy. • In the final report, Sophoi will write a narrative synthesis across the pillars which combines the progress made with the response of the system for each rubric. If helpful, this approach can be used in future reporting against rubrics.

	<p>at doing this, with the caveat that their interpretation would be largely based on their lived experience, rather than a formal context analysis.</p>	<ul style="list-style-type: none">• A side discussion explored the value of detailing and understanding the progress of policy development along a <i>timeline</i>, including critical tipping points, intervention points and pressure points, as well as challenges and delays. Seeing the Initiative temporally will help identify effective pathways and tactics.
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Section 5: Final reflections for field building

EEB's Advocacy Initiative for a transformative circular economy is getting results in the textiles and built environment sectors. The opportunity created by Laudes foundation to reflect on the nature of the team's expertise and the advances they are making can teach the wider advocacy field about the value of consistency and the integrated nature of policy advances. This section also highlights what this evaluation learned about under-utilised leverage points for future investment in the circular economy transition.

5.1 The value of consistency

There are indications that policy wins are beginning to shift attention and priorities. For example, sustainability is becoming a part of the CEO's agenda in the textile industry. This shift in attention creates friction and flow in the wider ecosystem. Sometimes new priorities reflect positive outcomes. Sometimes a shift in attention is a signal of resistance. This resistance is expressed in two key ways: (a) decreased activity and exclusion of an issue in policy and (b) increased activity in the form of explicit push back and counter-lobbying.

It is often assumed that advocacy needs to primarily be reactive and opportunistic, just as the Advocacy Initiative seized the energy crisis prompted by events in Ukraine to push the narrative of sufficiency. However, in complex systems agility is not enough. Change happens suddenly *and* slowly. This evaluation supports the idea that system "readiness" tends to emerge through distributed and consistent pressure requiring steadfastness and diplomacy among civil society actors, especially on EU-level policy work. The Circular economy movement would be a lot further behind without organisations like EEB working proactively with resistance to moving incrementally, but cumulatively, towards a transition.

5.2 The integrated nature of policy advances

Orienting an entire legislative body like the European Union and its regulated market is ambitious. It's a longer-term strategy, echoing the 'near and far' time horizons EEB straddles with the Advocacy Initiative.

Policy advances are rarely made piecemeal, making a holistic and systemic approach integral to gaining ground. Policies evolve through frameworks, external communications, evidence-based reports, letters, policy briefs, personal interactions and legislative files. Relationships strengthen through a process of engagement which requires actors to convene, and then convene again, and again, to negotiate meanings, shared values and social alignment.

From a design perspective, the Advocacy Initiative, which includes a combined focus on product and materials, new consumption narratives, trade, fiscal instruments and networks is well conceptualised. Each element reinforces the other. For example, new consumption narratives are not just about the long-term. They create different framings and opportunities for technical policy conversations, especially when they reveal how current policy realities rest on assumptions working against long-held EU values as well as the latest scientific advances in human knowledge and understanding. Similarly, work on trade and fiscal instruments support product policy aspirations by grounding technical requirements in an appreciation of the incentive structures business needs to make the transition.

The challenge from a funding perspective is that the advocacy landscape is large, and this evaluation only serves to identify how the Initiative could go wider and deeper, especially to enact, enforce and refine hard-won policy gains with the pace required to alleviate social and environmental pressure.

5.3 Where to direct future energy

This evaluation identified three main priority areas for future advocacy on the Circular Economy transition: fiscal incentives, harmonisation and inclusion. Sophoi considers these as under-utilised leverage points in the ecosystem.

5.3.1 Fiscal incentives

The most under-developed leverage points in the circular economy landscape are fiscal incentives. This is tricky territory for EU policy makers precisely because fiscal and economic instruments are national competencies. This jurisdictional dilemma does not escape the reality that instruments like VAT and taxes which work for linear models will not suffice for the Circular Economy transition. Here are some suggestions about how to move forward:

Embed fiscal incentives in material realities

The integrated nature of the Advocacy Initiative opens up the possibility space to consider fiscal reforms that are entwined in EU wide transparency and performance criteria. For example a product passport in combination with Due Diligence policy can justify the mobilisation of fiscal incentives at the national level, even if the incentives remain the prerogative of national governments. This way, the fiscal becomes embedded in the material reality of the Earth's finite resources and company-level investment in climate action, biodiversity and labour issues.

Invest in new economic forms

There is also scope to invest more directly in different ways of organising the economy. New and diverse economic forms currently exist (e.g., the commons, cooperatives, alliance contracting, conservation basic income, timebanks, libraries of things) alongside the underlying governance processes that support them (e.g., collective governance, budget transparency, participatory budgeting, exit to the community) but they go under-supported in current legal and fiscal frameworks.

Incentivise movement within the investor landscape

Within current legal and fiscal structures much more could be done to incentivise movement within the investor landscape toward Environmental Social Governance requirements and to incentivise company-level investment in climate action, biodiversity and labour issues. Investment markets also need to be mobilised to outlay capital for product and manufacturing innovations across supply chain systems.

Use real-time market data and complexity-based economic modelling to inform fiscal policy work

It's worth noting how interviewees informing this evaluation reflected how interactions between policy and market response are rarely predictable. It is Sophoi's sense that something more reactive and agile on fiscal and economic instruments could be built, either within or adjacent to EEB. This would need to be interdisciplinary work, combining technical EU policy experts with allies within the business, classically-trained economists and complexity-based economists to model narrow financial implications for industry in combination with a broader political economy analysis to observe shifts in power, and governance and justice.

5.3.2 Harmonisation

By looking at how all the pieces of the Advocacy Initiative influence one another, the evaluation did identify one area where the Advocacy Initiative and allies within industry may be more aligned than is explicitly recognised by the wider field: harmonised EU legislation. EEB advocates for harmonised legislation vs a patchwork of national policies and uncertainties surrounding national interpretations precisely because a level playing field reduces operational costs for business.

Industry also accepts that legislation which results in voluntary and administrative responses increases operating costs without providing the economic incentives, visibility and certainty for business to make positive changes. It's possible that more could be done to leverage this convergence of needs through civil society-industry campaign partnerships which grant policy makers permission to advance harmonised legislation.

5.3.3 Inclusion

Finally, there is urgent work to be done to include different income groups, races, genders and religions as well as consideration of local socio-economic disparities (e.g. fuel poverty within EU member states) and global socio-economic disparities (e.g., the livelihoods of people in emerging economies) in policy recommendations.

EEB's development of the Reinforced Network pillar in the Advocacy Initiative design creates a clear expectation that more diverse relationships should infuse technical policy work with new perspectives. The challenge for advocacy on the circular economy is to relationship-build at the pace required to upend existing power and hegemony in the EU policy making process.

Relationship building at intersectionalities involves creating the time and capacity to deeply understand and incorporate diverse perspectives. It is relational work that requires funding streams that permit individuals and groups to participate in an engagement process that lasts months, if not years.

Annexes

Annexe 1 - The process of co-developing the evaluative frameworks

To design an evaluation that could help both EEB learn about the effectiveness of the Advocacy Initiative design and Laudes translate this learning into their own internal system for grant monitoring, Sophoi designed two frameworks for evidence generation:

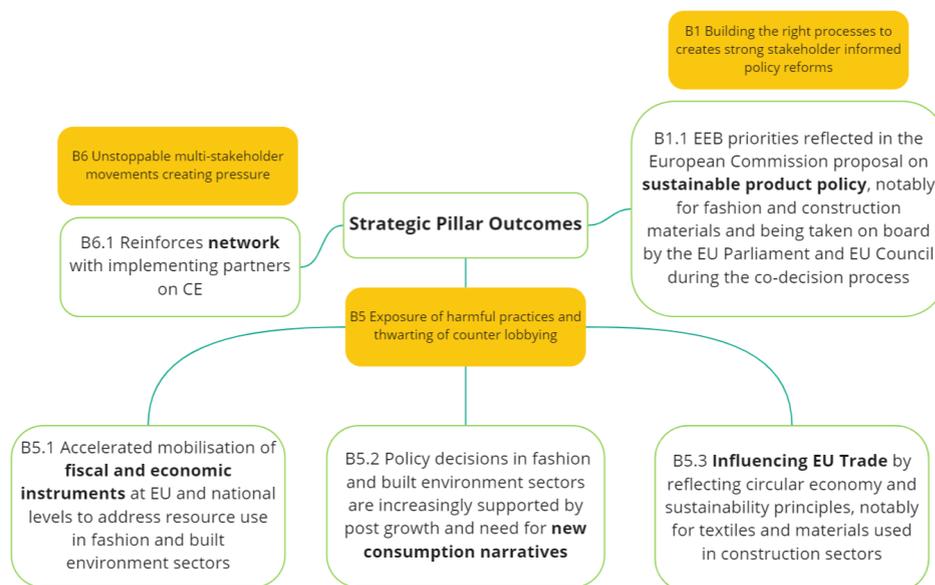
1. Integrated framework for evidencing Initiative Progress

Within advocacy evaluation it is usual practice to hone in on particular aspects of an Initiative to assess. The goals and context of advocacy initiatives are usually very broad so the success of evaluation relies on choosing priority areas to evaluate (Coffman, 2009; Glass, 2017; Rose, 2020).

During the Inception Phase of the evaluation, EEB, Laudes and Sophoi agreed on how the Initiative's strategic pillars aligned with three Laudes rubrics (see Figure 3). The team then independently and collectively reviewed the original grant agreement to select the output and outcome areas where the Initiative had been most "active". For example, the Initiative had shifted energy and focus on EU trade to channel resources to where they could have the greatest influence.

The integration process resulted in **five Progress Pillars** with outcomes under each (see [the data collection framework](#)). The evaluation team used this framework to collect evidence against Initiative Progress.

Figure 3 The relationship between EEB Strategic Pillar Outcomes and Laudes rubrics [B1, B5 and B6](#)



Sophoi conducted a [retrospective baselining](#) of the Laudes Rubrics B1, B5 and B6 for the circular EU economy. This has permitted the evaluation to situate progress within an understanding of the system status at the beginning of the grant period in 2020.

2. Integrated framework for evidencing Initiative Quality

The evaluation uses Laudes A rubrics to assess process-related aspects of the Advocacy Initiative, including design, implementation, monitoring, communication and learning, and organisation and network effectiveness. In response to EEB's interest to situate their understanding of the Initiative's effectiveness in the context of wider advocacy practice, Sophoi reviewed academic and NGO publications to identify the conditions of good advocacy design and implementation (see [Annex 9](#) for those reviewed).

The Evaluation team found Barkhorn, Huttner and & Blau's Advocacy Assessment Framework to be the most relevant because it had a significant overlay with the key elements of the Laudes A rubrics while helping to make the evaluation more targeted and specific to the nature of advocacy. For example, it oriented the evaluation to consider how the Initiative had worked within functional venues for policy adoption, open policy windows, and with coalitions, public opinion and powerful inside champions.

The integrated framework resulted in **five Quality Pillars** with 4 outcomes under each (see [the data collection framework](#) in Annex 3).

Annexe 2 - Progress Pillars Data Collection Framework

Framework 1 EEB Key Strategic Pillars	Framework 2 Laudes B rubrics	An integrated framework for assessing Initiative Progress, comprising five Progress Pillars and outcomes	Data Collection Sources
Sustainable Products and Materials policy	B1.1	<p>Sustainable Products and Materials policy</p> <p>Evidence of the robustness and comprehensiveness of the framework policy that includes:</p> <ol style="list-style-type: none"> 1. Evidence of horizontal requirements for all products, including information on materials and chemicals contents, circularity performance, and environmental impact to support a digital product passport 2. Evidence of a range of sustainable performance criteria will be required to place fashion and construction products on the market 3. Evidence of the Draft proposal by the EU Commission that reflects EEB priorities 4. Evidence of several position papers issued by national authorities reflecting EEB priorities 5. Evidence of an amendment proposed by rapporteur or shadow rapporteur reflect EEB priorities 	<p>Sustainable Products and Materials policy</p> <p>Internal Interviews External interviews Grant reports Public reports Document review</p>
Fiscal and economic instruments	B5.1	<p>Fiscal and economic instruments</p> <ol style="list-style-type: none"> 1. Evidence of virgin resources-use reduction targets and / or taxation at national level (in more than 6 countries) 2. Evidence that there is a mandatory Green Public Procurement (GPP) with an annual improvement report 3. Evidence that the Extended Producer Responsibility (EPR) schemes with modulation is established in more than 10 countries (or required by EU law) 	<p>Fiscal and economic instruments</p> <p>Internal Interviews External interviews Grant reports Public reports Document review</p>
New Consumption narratives	B5.2	<p>New Consumption narratives</p> <ol style="list-style-type: none"> 1. Evidence of marketing of circular solutions and new business models offering circular services as a norm / routine in the fashion sector 2. Evidence that information on sustainable features of building required in building transactions and permitting 3. Use of alternative indicators to GDP are complementing GDP based analysis in official EU Commission reports (<i>long term goal</i>) 	<p>New Consumption narratives</p> <p>Internal Interviews External interviews Public reports Communication monitoring</p>

Influencing EU Trade	B5.3	Influencing EU Trade <ol style="list-style-type: none"> 1. Evidence of product standards are used in exported goods, particularly the waste shipment regulation reducing the inappropriate export of waste and reused material 2. Evidence of EEB leveraging Corporate Responsibility / Due Diligence policy instruments to formalise product recognition schemes in EU trade 3. Evidence of EEB engaging in activities to strengthen consumer empowerment that builds demand for product recognition schemes in EU trade 	Influencing EU Trade <p>Internal Interviews External interviews Grant reports Public reports Document review</p>
Reinforced Networks	B6	Reinforced Networks <ol style="list-style-type: none"> 1. Evidence of the number of papers related to circular fashion and built environment co-signed with partners outside the NGO community 2. Evidence that EEB is involved in more than four projects at the global level on CE with fashion and built environment-related activities 	Reinforced Networks <p>Internal Interviews External interviews Communication monitoring Public reports Grant reports</p>

Annexe 3 - Quality Pillars Data Collection Framework

Advocacy Assessment Framework (see Slide 16)	Laudes A rubrics (see Slide 17)	An integrated framework for assessing Initiative Design & Delivery, comprising 5 Quality Pillars and 4 outcomes under each	Data Collection Sources
<ul style="list-style-type: none"> 1.Functioning venues for adoption 2.Open policy window 4.Dynamic master plan - strategy 6a. Influential support coalition – suitability and complementarity of partners 	A1 Design addresses the important issues / needs	<p>Design</p> <ul style="list-style-type: none"> 1. Evidence on the coherence of the ToC / five-pillar strategy for intended impact 2. Evidence on the blend of intensity and consistency to achieve intended impact 3. Evidence on the functionality of institutions and external events / trends visible in design 4. Evidence on strength of partner selection & diversity 	<p>Design</p> <ul style="list-style-type: none"> 1. Independent Review 2. Internal Interviews & grant reports 3. External interviews & grant reports 4. Internal interviews & comms monitoring
<ul style="list-style-type: none"> 9.Clear implementation path 3.Feasible solutions 6b.Influential support coalition – improving org capacity of partners 	A2 Implementation is inclusive, enabling, empowering, and capacity-enhancing	<p>Implementation</p> <ul style="list-style-type: none"> 1. Evidence on focus and clarity of implementation path 2. Evidence on agility and responsiveness to opportunities 3. Evidence on the feasibility of real-world tactics used 4. Capacity building of partners and individuals, including marginalised 	<p>Implementation</p> <ul style="list-style-type: none"> 1. Interviews & grant reports 2. Interviews & grant reports 3. Interviews & document review 4. External interviews
n/a	A3 Monitoring informs sound adaptive management	<p>Monitoring & adaptation</p> <ul style="list-style-type: none"> 1. Evidence on quality of reporting 2. Evidence on use of evidence for decision-making (mix, triangulation, theory-building) 3. Evidence on the integration of contextual changes into decision-making 4. Evidence on quality of sensemaking practice 	<p>Monitoring & adaptation</p> <ul style="list-style-type: none"> 5. Independent Review 6. Internal interviews & grant reports 7. Internal interviews 8. Internal interviews & independent review

<p>5a.Strong campaign leader - can execute comms plans 6c.Influential support coalition – alignment between partners 7. Mobilised public 8.Powerful inside champions</p>	<p>A4 Communication promotes internal and external collective learning</p>	<p>Communication & learning</p> <ol style="list-style-type: none"> 1. Evidence of credibility of EEB as campaign leader amongst key audiences 2. Evidence of well-aligned external messaging 3. Evidence of relevant audiences being encouraged to reflect on the solution and their role in supporting it 4. Evidence of decision-makers who can overcome the opposition being encouraged to reflect 	<p>Communication & learning</p> <ol style="list-style-type: none"> 9. External interviews 10. Document review & grant reports & comms monitoring 11. Interviews 12. Interviews
<p>5a.Strong campaign leader - can assemble and lead resources</p>	<p>A5 Organisation and network capacity</p>	<p>Organisation and network capacity</p> <ol style="list-style-type: none"> 1. Evidence of strong person-job fit 2. Evidence of financial stability 3. Evidence of fundraising capacity 4. Evidence of inclusive learning culture 	<p>Organisation and network capacity</p> <ol style="list-style-type: none"> 13. Internal interviews & Independent Review 14. Grant reports + internal evidence 15. Grant reports + internal evidence 16. Internal Interviews

Annexe 4 - Co-developed Laudes Rubrics Baseline for EEB Circular Economy Advocacy Initiative

Relevant Laudes Rubric	Rubric Translation	Overall Laudes Baseline	Baseline rationale				
1 - Number and Title of Laudes Rubric	2 - EEB outcome(s) related to this Laudes rubric	3 - Headline baseline rating	4 - Specific changes expected (by 2022) within each outcome(s) (Baseline priority in blue)	5 - Laude rubrics baseline rating by EEB specific criteria (Driven off system 'signals' supporting narrative in Column 6)	6 - Systems 'signals' supporting narrative - EEB team rationale based on recollection of 2020 baseline (Separating fashion & built environment sectors status where possible)	7 - Supporting evidence / evidence sources (if available)	8 - Notes
B1. Building the right processes to create strong, stakeholder-informed policy reforms	B1.1 EEB priorities reflected in the European Commission proposal on sustainable product policy , notably for fashion and construction materials and being taken on board by the EU Parliament and EU Council during the co-decision process	Unconductive "There is some evidence of a modest mindset shift among policymakers towards more inclusive policymaking, and there are early signs of stakeholders' recommendations finding their way into policymaker discussions and agendas."	<p>B1.1.1 Framework policy includes EEB priority points on products and sustainable performance criteria</p> <p>B1.1.2 Decision-makers relay EEB priorities and the draft proposal by EU commission reflects EEB's priorities</p> <p>B1.1.3 Consultation process for the implementation of the policy measures is based on multi-stakeholder forum, including national experts, industry, consumers and green NGOs</p>	<p>B1.1.1 Unconductive</p> <p>B1.1.2 Unconductive</p> <p>B1.1.3 Partly conducive (As here the goal was first to maintain the X-stakeholders forum as exist, even if we can still improve the governance)</p>	<ul style="list-style-type: none"> • Circular fashion - No EU policy on sustainable textiles apart voluntary schemes (Ecolabel) • Built environment - Built policy is nearly exclusively on energy apart C&D waste targets under WFD • Overall: only energy using products were covered with Ecodesign policy 	<ul style="list-style-type: none"> • Circular fashion - • Built environment - 	<ul style="list-style-type: none"> • Original C&A Foundation baseline rated unconductive in both advocacy and environmental sustainability

1 - Number and Title of Laudes Rubric	2 - EEB outcome(s) related to this Laudes rubric	3 - Headline baseline rating	4 - Specific changes expected (by 2022) within each outcome(s) (Baseline priority in blue)	5 - Laudes baseline by EEB specific criteria (Driven off system 'signals' supporting narrative in Column 6)	6 - Systems 'signals' supporting narrative - EEB team rationale based on recollection of 2020 baseline (Separating fashion & built environment sectors status where possible)	7 - Supporting evidence / evidence sources (if available)	8 - Notes
B5. Exposure of harmful practices and thwarting of counter-lobby	B5.1 Accelerated mobilisation of fiscal and economic instruments at EU and national levels to address resource use in fashion and built environment sectors	*Unconductive (Overall B5 rubrics baseline defined as 'harmful' based on a synthesis of the systems 'signals' supporting narrative across B5.1, B5.2, & B5.3 as defined in Column 6)	The EU green finances taxonomy on Circular Economy reflects EEB priorities: 5.1.1 Reduced use of virgin resources is a key condition to be awarded 5.1.2 New business models enabling to save on resources are recognized in the taxonomy 5.1.3 Extended Producer Responsibility (EPR) schemes considered on textiles and construction products in more countries compared to 2019 (only France has an EPR scheme for textile and not necessarily well performing)	5.1.1 Unconductive 5.1.2 Unconductive 5.1.3 Unconductive (EPR schemes not existing)	<ul style="list-style-type: none"> • Circular fashion - There was no economic instruments addressing Circular Fashion at EU level (only modulated fee under FR EPR scheme, but even in FR, not significant) • Built environment - No economic instruments addressing circularity of built environment, except landfill waste charge for C&D 	<ul style="list-style-type: none"> • Only one EPR scheme in FR for textiles 	<ul style="list-style-type: none"> • Original C&A Foundation baseline rated harmful in both advocacy and environmental sustainability

<p>B5.2 Policy decisions in fashion and built environment sectors are increasingly supported by post-growth and the need for new consumption narratives</p>	<p>Harmful</p> <p>“CSOs and cross-sectoral movements are not yet well organised or sufficiently influential in exposing harmful practices or holding others to account. Even when policies are in place that requires business practices that are climate-positive and contribute to equity, many businesses are able to conceal harmful practices and avoid being held to account.”</p> <p>(Overall B5 rubrics baseline is defined as ‘harmful’ based on a synthesis of the systems ‘signals’ supporting narrative across B5.1, B5.2, & B5.3 as defined in Column 6)</p>	<p>5.2.1 Marketing of circular solutions and new business models offering circular economy services are a routine in the fashion sector</p> <p>5.2.2 Additional Information on sustainable features of buildings is required in building transactions and building permitting processes</p> <p>5.2.3 Alternative indicators to GDP are complementing GDP based analysis in official EU Commission reports</p>	<p>5.2. Harmful</p> <p>5.2.2 Harmful</p> <p>5.2.3 Harmful</p>	<ul style="list-style-type: none"> • Circular fashion - clothing production has doubled from 2000 to 2014, with more than 150 billion garments now produced annually, and 73% of all textiles ending up in landfill or incineration • Built environment - 15% of construction material is wasted on average; demolition rather than deconstruction is the norm for built end of life,, construction materials represent 50% by weight of all EU material flows and 33% of EU waste • Overall: there is no mandatory harmonised disclosure of information with regards circularity or sustainability performances of fashion or construction materials/products or buildings 	<ul style="list-style-type: none"> • See impact assessment of new Ecodesign for textiles (lengthy document) • See evaluation of CPR regulation on DG GROW site (quite long document) 	<ul style="list-style-type: none"> • Original C&A Foundation baseline rated harmful in both advocacy and environmental sustainability
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1 - Number and Title of Laudes Rubric	2 - EEB outcome(s) related to this Laudes rubric	3 - Headline baseline rating	4 - Specific changes expected (by 2022) within each outcome(s) (Baseline priority in blue)	5 - Laudes baseline by EEB specific criteria (Driven off system 'signals' supporting narrative in umn 6)	6 -Systems 'signals' supporting narrative - EEB team rationale based on recollection of 2020 baseline (Separating fashion & built environment sectors status where possible)	7 - Supporting evidence / evidence sources (if available)	8 - Notes
	B5.3 Influencing EU Trade by reflecting circular economy and sustainability principles, notably for textiles and materials used in construction sectors	*Harmful (Overall B5 rubrics baseline defined as 'harmful' based on a synthesis of the systems 'signals' supporting narrative across B5.1, B5.2, & B5.3 as defined in Column 6)	5.3.1 Waste shipment regulation revision includes a ban on waste export outside EU, including of textiles waste, except under the strict conditions of equivalent standards or pre-consented facilities 5.3.2 Mechanisms that are supportive of EEBs product policy (i.e. consumer empowerment, corporate responsibility and due diligence) are leveraged to enable the uptake of sustainable product policy instruments	5.3.1 Harmful 5.3.2 Harmful	<ul style="list-style-type: none"> • Circular fashion - There was no waste shipment restrictions except for hazardous waste, and no clear description or process to assess equivalent Environmental Sound Management criteria - There was no due diligence legislation for textiles - there is no sustainability labelling • Built environment - same as above, 	<ul style="list-style-type: none"> • See evaluation & impact assessment of Waste shipment regulation (big documents) • See study document accompanying CSDD 	<ul style="list-style-type: none"> • Original C&A Foundation baseline rated harmful in advocacy • Very specific changes 5.3.1 and 5.3.2 against which to baseline. • Suggest overall B5 baseline driven off B5.2
B6. Unstoppable multi-stakeholder movements creating pressure	B6.1 Reinforced network with implementing partners on CE	Partly Conducive "Some of the most relevant Civil Society Organisations and other stakeholder groups are making some progress in identifying together what change is needed and how to advocate for it. There is evidence that this process will create coalitions or alliances with relatively strong organisational and network capacity to be able to do so effectively.	B6.1.1 EEB invited to be part of the most relevant multi-stakeholder initiatives with industry on fashion and building at EU level B6.1.2 EEB involved in at least two projects on the circular economy beyond EU boundaries, with fashion and built environment	B6.1.1 Partly conducive B6.1.2 Unconductive (* at baseline)	<ul style="list-style-type: none"> • Circular fashion - • Built environment - <p>For both sectors, EEB was in leadership groups of EU CE Platform on textiles & buildings</p> <p>For both sectors, EEB is not involved in any significant project at international level</p>	<ul style="list-style-type: none"> • B6.1.1 evidence of EEB stakeholder initiative at baseline vs present - • B6.1.2 evidence of number of projects on circular that EEB is involved in at baseline vs present - 	<ul style="list-style-type: none"> • Original C&A Foundation baseline rated just ok (partly conducive) in organisational and unconductive in advocacy •

Annexe 5 - Progress ratings table

Using the Red Amber Green (RAG) Progress Rating Scale

The colours you see in the progress rating scales correspond to the descriptions in the table below. As is typical with these scales, red signifies no evidence of progress and green indicates ambitious goals have been met.

1	2	3	4	5
No available evidence to show that progress has been made in this area	Some evidence shows progress, but little evidence the Advocacy Initiative contributed to the progress or results	Good evidence that progress has been made and could reasonably be related to the Advocacy Initiative	Good evidence that progress and results were due to the Advocacy Initiative	Ambitious goals have been met as a direct result of the Advocacy Initiative

The evaluation team considered two criteria when using the scale to assess the degree of progress that has been made by the Advocacy Initiative over the last two years.

- Firstly, the evaluation team assessed the **strength of evidence that indicates results or progress** across the Advocacy Initiative strategic pillars, particularly in the textiles and built environment sectors of the EU Circular Economy. This weighting is largely based on whether there are a variety of robust sources of evidence (i.e. two or more interviews, media, publications and documents) that can be used to 'triangulate' claims of progress or results.
- Secondly, the evaluation team looked for **evidence that the Advocacy Initiative made a contribution** to the results and progress. This weighting is largely based on whether it is clear that the EEB's goals are reflected in policy material, or whether the team's efforts are reported by external stakeholders to have been a key contributor.

Table 25 Progress rating scale for Sustainable Products and Materials Policy Indicators (B1)

	Indicator	RAG Rating
1	Evidence of horizontal requirements for all products, including information on materials and chemicals contents, circularity performance, and environmental impact to support a digital product passport.	There is strong evidence that the new Regulation on Ecodesign for Sustainable Products has a broad coverage of products and a scope of requirements which target the durability, reusability, and reparability of products among other criteria. There is equally strong evidence across interviews that the Advocacy Initiative has been instrumental in achieving this goal.
2	Evidence of a range of sustainable performance criteria will be required to place fashion and construction products on the market.	The evidence shows that the Sustainable Products Initiative and Ecodesign policies specifically identify the need to target the built environment and textiles products, and while not being as ambitious as the EEB, are a substantial shift towards the transition to the Circular Economy. Several stakeholders attributed the measure in the SPI and the Ecodesign policy as a result of the Advocacy Initiative's efforts.
3	Evidence of the Draft proposal by	There is specific evidence in the Sustainable Products Initiative, and

	the EU Commission that reflects EEB priorities.	the related policies and strategies, that reflect the Advocacy Initiative's areas of influence, and this contribution is corroborated by multiple sources.
4	Evidence of several position papers issued by national authorities reflecting EEB priorities.	Given the Sustainable Products Initiative has only recently been released, and the geographic level where the Advocacy Initiative has focused its efforts, it is too early for member states or national authorities to take up specific policy positions yet.
5	Evidence of an amendment proposed by the rapporteur or shadow rapporteur reflects EEB priorities.	One amendment has been proposed by a Shadow Rapporteur and Member of the European Parliament targeting the Waste Shipment Regulation. The evaluation team do not have evidence that amendments were proposed within the two-year period for the textiles or building sectors related to the Sustainable Products Initiative or Ecodesign policy, although it is clear that EEB and its members have engaged with MEPs.

Table 26 Progress rating scale for Fiscal and Economic Instruments (B5.1)

	Indicator	RAG Rating
1	Evidence of virgin resources-use reduction targets and/or taxation at the national level (in more than 6 countries).	There are 6 member states in various stages of addressing resource reduction targets. These cannot be linked directly to the Advocacy Initiative.
2	Evidence that there is a mandatory Green Public Procurement (GPP) with an annual improvement report.	There is evidence that suggests the Green Public Procurement process is underway in the textiles sector, and that there may be mandatory requirements from 2024 in the buildings sector under the Energy Performance of Buildings Directive. There is evidence that the Advocacy Initiative recently provided a policy brief where this measure was elaborated but it is not clear how this contributed to the EPBD. Mandatory GPP only covers battery products and is otherwise voluntary for other sectors at this point.
3	Evidence that the Extended Producer Responsibility schemes with modulation are established in more than 10 countries (or required by EU law).	There is currently only one Extended Producer Responsibility policy active in the EU (France) with similar measures being considered or underway. There is evidence that the Advocacy Initiative has contributed substantially.

Table 27 Progress rating scale for New Consumption Narratives (B5.2)

	Indicator	RAG Rating
1	Evidence of marketing of circular solutions and new business models offering circular services as a norm/routine in the fashion sector.	There is evidence that shows that circular and sustainable business models are becoming more common though far from the norm. There is less robust evidence that the Advocacy Initiative has directly contributed to this shift.
2	Evidence that information on sustainable features of a building is required in building transactions and permitting.	At this point, there are no mandatory requirements in place yet. Evidence indicates this will be a slow process although the Advocacy Initiative has contributed to catalysing change. While this rating doesn't reflect the energy channelled towards this outcome, the specific requirement for this evidence may need to be changed to reflect narrative change instead of technical specifications

		(which are linked to product policy).
3	Evidence of the use of alternative indicators to GDP complements GDP-based analysis in official EU Commission reports (long-term goal).	Changing GDP indicators is an ambitious and explicitly long-term goal. However, the evaluation team sees evidence of EEBs influence in this area and the early shifts that reflect this influence.

Table 28 Progress rating scale for Influencing EU Trade (B5.3)

	Indicator	RAG rating
1	Evidence of product standards used in exported goods, particularly the waste shipment regulation reducing the inappropriate export of waste and reused material.	There is clear evidence that the Advocacy Initiative has influenced the waste shipment regulation (in collaboration with other organisations) to ensure a more comprehensive policy. Despite the complexity of the policy area, the team was effective in identifying inconsistencies across different policy files.
2	Evidence of EEB leveraging Corporate Responsibility / Due Diligence policy instruments to formalise product recognition schemes in EU trade.	There is evidence that Corporate Sustainability Due Diligence is becoming part of the EU trade toolbox and that the EEB and partners have influenced the Corporate Sustainability Due Diligence policy as a new legal instrument to give policies teeth. However, this outcome isn't as ambitious as the Advocacy Initiative aimed for. It is clear consistent counter-lobbying has hindered progress in this contested area.
3	Evidence of EEB engaging in activities to strengthen consumer empowerment that builds demand for product recognition schemes in EU trade.	There is good evidence that Bureau Européen des Unions de Consommateurs (BEUC) and EEB's combined, consistent interventions and partnership has resulted in achieving the minimum targets of this objective but are yet to reach the ambition set by the EEB.

Table 29 Progress rating scale for Reinforced Network (B6)

	Indicator	RAG Rating
1	Evidence of the number of papers related to circular fashion and built environment co-signed with partners outside the NGO community	<p>There is little doubt that the EEB has engaged with a broad and trusted network of partners across scales and across the environmental, social, and political landscape. Their strength in convening and network building and identifying key players and technical experts to produce evidence-based policy decisions and compelling narratives is evident in comments from almost all stakeholders interviewed.</p> <p>Several key sectors have yet to be engaged by the Advocacy Initiative to secure the momentum of their work so far, bolster their NGO base, and ensure a more coherent, united message that is representative of the CSO/NGO voice, as well as less represented voices in the Circular Economy ecosystem.</p>
2	Evidence that EEB is involved in more than four projects at global level on CE with fashion and built environment-related activities	The evaluation team have some evidence that the Advocacy Initiative has begun engaging with two international networks, African Circular Economy Network (ACEN) and the International Council for Circular Economy in India (ICCE). They have not begun working on something tangible together.

Annexe 6 - Laudes Rubric Assessment for B Rubrics with Rationale

Table 30 Rubrics assessment for Sustainable Products and Materials Policy

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022	Rationale
B1 Stakeholder -informed policies	Framework policy includes EEB priority points on products and sustainable performance criteria	Unconductive	Partly conducive	We can evidence the Advocacy Initiative is influencing important reforms through participatory mechanisms, which has shifted the policies towards a more conducive landscape. Some important changes have not been incorporated and the need to “hold” policy positions through implementation phases will require more evidence, innovation and sustained advocacy by civil society. The absence of social dimensions in products and materials policy is a key concern, both to distribute power and wealth and to reduce harm. EEB has been vocal on the reforms needed across its communications platforms, in policy papers and suggested amendments and through a variety of campaign activities.

Table 31 Rubrics assessment for Fiscal and Economic Instruments

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022	Rationale
B5. Exposure of harmful practices and thwarting of counter-lobby	B5.1 Accelerated mobilisation of fiscal and economic instruments at EU and national levels to address resource use in fashion and built environment sectors	Unconductive	Unconductive	<p>The Advocacy Initiative has contributed to progressing fiscal and economic incentives through the Textile Strategy and Taxonomy. The combination of fiscal penalties and rewards have not reached a tipping point where it no longer makes economic sense to persist with ‘business-as-usual’.</p> <p>A movement to Partially Conductive is likely contingent on stronger partnerships which can uplift responsive and strategic capacity for advocacy on fiscal and economic instruments, and the prioritisation of this file on the EC agenda.</p>

Table 32 Rubrics assessment for New Consumption Narratives

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022	Rationale
B5 Exposure of harmful practices and thwarting of counter-lobby	B5.2 Policy decisions in fashion and built environment sectors are increasingly supported by post growth and need for new consumption narratives	Harmful	Unconductive	Sophoi can see the Advocacy Initiative becoming more skilful in the use of narrative – both to anchor specific policy work on the circular economy and to place issues on the policy agenda. As a team which understands the big picture and the technicalities of the EU legislative process, EEB plays an important translation role, and their contribution to shifting the circular economy narrative is evident at the EU level. But Sophoi have not seen either industry move away from an economic growth model. Textiles and the built environment are tentatively exploring other narratives, but they are yet to adopt them with any conviction. More work is required to sustain public interest and civil society pressure, by presenting a tangible vision of the future with the wide-ranging benefits that will flow from it.

Table 33 Rubrics assessment for Influencing EU Trade

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022	Rationale
B5 Exposure of harmful practices and thwarting of counter-lobby	B5.3 Influencing EU Trade by reflecting circular economy and sustainability principles, notably for textiles and materials used in construction sectors	Harmful	Unconductive	EEB and its partners have had some success in exposing harmful practices and in paving the way for holding others to account. But further efforts are needed both to hold the line on policy gains and to anticipate counter-lobbying in due diligence, Waste Shipment Regulation and other emerging policies. These are complex policy files and tensions between broad horizontal rules and sector-specific targets are ongoing.

Table 34 Rubrics assessment for Reinforced Network

Rubric	Goal of funded Advocacy Initiative	Baseline	June 2022	Rationale
<p>B6 Unstoppable multi-stakeholder movements creating pressure</p>	<p>Reinforced network with implementing partners on Circular Economy</p>	<p>Partly conductive</p>	<p>Partly conductive</p>	<p>The cross-sectoral movements are highly functional and making reasonable progress, particularly on evidence-based policy making. But there is still a lot of work to do to continue diversifying networks into under-represented industries and non-environmental civil society groups to support a socially just and regenerative implementation of circular economy practices, which distribute power and influence and promote upward accountability.</p>

Annexe 8 - Stakeholders interviews

	Name	Organisation	Position	Stakeholder Group	Date Interviewed
1	Stephane Arditi	EEB	Director of Policy Integration and Circular Economy.	Internal	22 March 2022 13 April 2022 19 April 2022
2	Emily Macintosh	EEB	Policy Officer for Textiles	Internal	23 March 2022 28 April 2022
3	Gonzalo Sanchez	EEB	Policy Officer for Circular Economy and Carbon Neutrality in the Building Sector	Internal	23 March 2022 10 March 2022
4	Roberto Arbinolo	EEB	Communications Officer	Internal	29 March 2022
5	Nick Meyen	EEB	Senior Policy Officer for Systemic Change	Internal	19 May 2022
6	Denise Godinho	EEB	Director of Communications	Internal	19 May 2022
7	Emma Ernst	EEB	Director of Membership and Development	Internal	19 May 2022
8	Francesca Carlsson	EEB	Senior Legal Officer and Lead on Trade and Due Diligence	Internal	6 May 2022
9	Blanca Morales	EEB and BEUC	Senior Coordinator for EU Ecolabel	Internal	6 May 2022
10	Dimitri Vergne	BEUC	Team Leader - Sustainability	External	11 May 2022
11	Daniel Montalvo	EEA	Head of Group Sustainable Resource Use and Industry	External	12 May 2022
12	Fulvia Rafaelli	European Commission	Head of Unit - DG GROW	External	30 May 2022
13	Valeria Botta	ECOS	Programme Manager	External	13 May 2022
14	Lauren Weir	Environmental Investigation Agency	Ocean Campaigner	External	25 May 2022
15	Dr Takunda Chitaka	ACEN	Postdoctoral Researcher	External	17 May 2022
16	Holger Schmid	MAVA Foundation	Director - Sustainable Economy	External	18 May 2022
17	Javier Tobias	ECODES	Project Manager	External	13 May 2022

18	Michael Schragger	Sustainable Fashion Academy	Founder and Executive Director	CE landscape	17 May 2022
19	Natasha Hulst	Schumacher Center for New Economics	Program Director for European Land Commons	CE landscape	19 May 2022
20	Nusa Urbancic	Changing Markets Foundation	Campaigns Director	External	8 June 2022
21	Professor Kate Fletcher	Earth Logic	Professor of Sustainability, Design, Fashion at the Centre for Sustainable Fashion, London	CE landscape	18 May 2022
22	Mathilda Tham	Earth Logic	Design + Change Researcher at Linnaeus University, Sweden	CE landscape	18 May 2022

Annexe 9 - Documents Reviewed

Interviews were supported by a document review of more than 130 data sources including:

- EEB's strategy documents, biannual grant monitoring reports, communications monitoring data, private email correspondence and advocacy outputs, including evidence reports, policy briefs, campaign messaging, videos and articles;
- European Commission policy proposals and regulation documents across major policy file areas within the remit of the Advocacy Initiative;
- Contextual documents and podcasts detailing the circular economy landscape, including in both the textiles and built environment sectors.

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Annexe 11 - Methodology

Table 35 The five Progress Pillars and five Quality Pillars of the evaluation design

Progress Pillars	Quality Pillars
<p>B1 Stakeholder-informed policies</p> <p>1. Sustainable Product and materials EEB priorities reflected in the European Commission proposal on sustainable product policy.</p> <p>B5 Exposing and thwarting harm</p> <p>2. Fiscal and economic instruments Accelerated mobilisation of fiscal and economic instruments at EU and national levels to address resource use in fashion and built environment sectors.</p> <p>3. New Consumption Narratives Policy decisions in fashion and built environment sectors are increasingly supported by post growth and need for new consumption narratives.</p> <p>4. Influencing EU trade Influencing EU trade by reflecting circular economy and sustainability principles, notably for textiles and materials used in construction sectors.</p> <p>B6 Multi-stakeholder movements pressure</p> <p>5. Reinforced network Reinforced network with implementing partners on Circular Economy.</p>	<p>A1 Design Design addresses the important issues / needs.</p> <ol style="list-style-type: none"> 1. Coherence of the ToC / five pillar strategy for intended impact 2. A blend of intensity and consistency to achieve intended impact 3. Functionality of institutions and external events / trends visible in design 4. Strength of partner selection & diversity <p>A2 Implementation Implementation is inclusive, enabling, empowering, and capacity-enhancing.</p> <ol style="list-style-type: none"> 1. Focus and clarity of implementation path 2. Agility and responsiveness to opportunities 3. Feasibility of real world tactics used 4. Capacity building of partners and individuals, including marginalised <p>A3 Monitoring and adaptation Monitoring informs sound adaptive management.</p> <ol style="list-style-type: none"> 1. Quality of reporting 2. Use of evidence for decision-making (mix, triangulation, theory building) 3. Integration of contextual changes into decision-making 4. Quality of sensemaking practice <p>A4 Communication and learning Communication promotes internal and external collective learning.</p> <ol style="list-style-type: none"> 1. Credibility of EEB as campaign leader amongst key audiences 2. Well aligned external messaging 3. Relevant audiences being encouraged to reflect on the solution and their role in supporting it 4. Decision-makers who can overcome the opposition being encouraged to reflect <p>A5 Organisation and network capacity Capability and capacity to deliver on outcomes.</p> <ol style="list-style-type: none"> 1. Strong person-job fit 2. Financial stability 3. Fundraising capacity 4. Inclusive learning culture

Figure 5 Diagram representing the evaluation process and the stakeholders involved

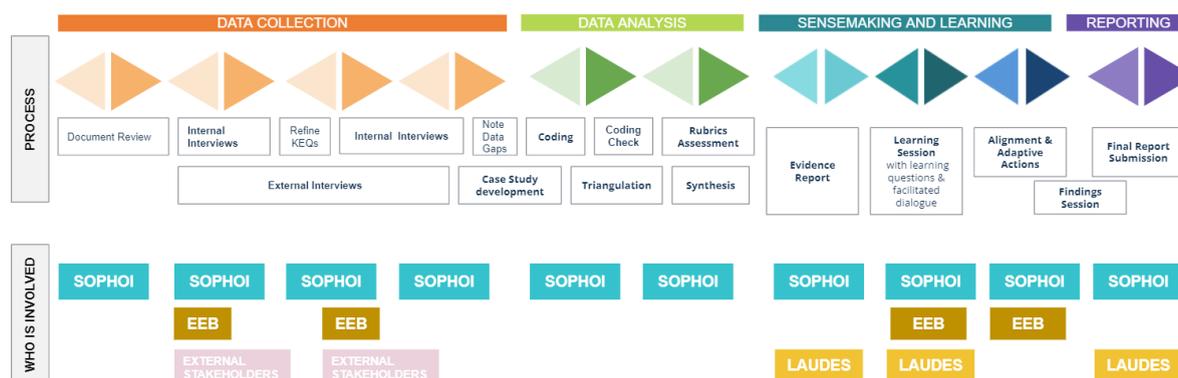


Table 36 Key evaluation questions

Key Evaluation questions	
Internal Stakeholders (EEB staff)	External Stakeholders (EEB partners and other stakeholders)
<ol style="list-style-type: none"> 1. What have the greatest achievements been in the last two years and why? 2. What contributed positively and negatively to the results? 3. Where did you get frustrated along the way? 4. On reflection do you feel you identified the right approaches for this work? 5. Who else was involved? <p>Wrap-up question:</p> <ul style="list-style-type: none"> • What do you value most about yourselves? What do others value about the role you play? 	<ol style="list-style-type: none"> 1. What have the Initiative’s greatest achievements been in the last two years and why? 2. What contributed positively and negatively to their results? 3. Where did you get frustrated along the way? 4. On reflection, do you feel identified the right approaches for this work? 5. Who else was involved? <p>Wrap-up question:</p> <ul style="list-style-type: none"> • What do you value most about the role EEB plays in the ecosystem of actors working towards circular economy?

Table 37 Evidence Analysis

Evidence	Analytical tool
<i>For distance travelled:</i>	<p>The evaluation team used a Red Amber Green (RAG) progress rating scale (See Annexe 5) to systematically integrate all the data into an assessment of progress.</p> <p>The evaluation team drew out the key achievements, where the strongest evidence of the Initiative’s contribution was clear. An assessment of evidence strength was guided by i) quantity of sources and ii) diversity of sources.</p>
<i>For systems response:</i>	<p>To differentiate between policy and narrative progress and change, the evaluation team analysed the data set for signals of resistance and signals of change to summaries what the evaluation team learned about how the system has responded and evolved between 2020-2022.</p>

<i>For rubrics rating:</i>	The evaluation team used both distance travelled and systems response to inform a rubrics assessment using the 5 point rating scale from Unconductive - Thrivable provided by Laudes (See Figure 5 below).
<i>For future opportunities:</i>	The evaluation team explored potential future directions for each Progress Pillar as questions for reflection. These questions evolved through conversation and analysis of what is energising individuals about the transition to a circular economy.

Figure 6 The Laudes 5 point rating scale, used for all rubrics - A and B

