Opinion

Title
Impact Assessment on: the Communication on a i2010 European Initiative on e-Inclusion "No one left behind in the Information Society".

(draft version of August 2007)

Lead DG
DG Information Society

1) Impact Assessment Board Opinion

(A) Context

The initiative "i2010 – A European Information Society" was adopted in 2005 as a part of the renewed Lisbon Strategy for growth and employment. It follows the eEurope 2002 and eEurope 2005 action plans. Three main priorities have been identified:

- The creation of a Single European Information Space which promotes an open and competitive internal market for information society and media;
- Stepping up innovation and investment in ICT research;
- Achieving an inclusive European Information Society that prioritizes better public services and quality of life.

In this context, the Riga Ministerial Declaration on an Inclusive Information Society (June 2006) paved the way for an Initiative of the Commission in the area of e-Inclusion.

(B) Positive aspects

Although a few corrections should be made, the general and specific objectives are generally well defined.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance.

General recommendation: The report should be more focused and concise, in line with the principle of proportionate analysis. The IA report should also result in clarifying the options considered for the e-inclusion initiative. Notably, the report should make clear which elements of the initiative are still to be defined (and should thus be the subject of the IA report), and which elements were already decided in another separate framework (e.g. in the framework of the Riga Declaration).
Given these recommendations, the Board is prepared to issue a revised opinion in case INFSO re-submits a proper draft IA.

(1) The value added of the EU action needs to be better demonstrated.
The problem areas of e-inclusion (including how these problems are likely to evolve) and the objectives should be clarified and prioritised, in order to provide a realistic and clearer explanation of the added value of EU action. The report briefly refers to the previous vertical initiatives, but it does not build on the lessons learned from the progress and shortcomings of those previous actions and it does not sufficiently demonstrate the value added of new Community action. This would be necessary to establish a clear case for the need for further EU intervention.

(2) The content of each option needs to be further clarified.
The IA report would benefit from a clear benchmark option devoid of new policy actions, and from a clearer differentiation of options B and C, also in relation to the specific objectives (Box 2). In particular, while stating in the introduction that the actions proposed are non-regulatory, option C seems to include legislative actions on e-Accessibility: the text should clarify whether option C involves additional initiatives, including legislative ones, or only strengthened co-ordination. This would justify that section 5 covers only the e-Accessibility. The coordination mechanism foreseen under option C should also be further described. Section 5 on e-Accessibility should be integrated into the IA report before it arrives at the comparison of options.

(3) The analysis of the impacts could be further elaborated
The environmental and economic impacts should be considered for each different option, ie not just from an overall perspective. For economic impacts, an appraisal of costs comparable to the appraisal of the potential benefits should be added. In addition, it should be clarified how a reduction of the digital divide would enhance labour supply of current unemployed and student, as stated in the given estimates. The risk for marginalised groups of falling behind due to an increase of ICT use, in general and in particular areas, notably e-inclusion, should be discussed in more detail.

(D) Procedure and presentation
It appears that all necessary procedural requirements have been complied with.

The main report is considerably longer than the 30 pages recommended by the Guidelines, and would benefit from a more focussed presentation particularly of the context and background. It is therefore recommended to shorten the report in line with the principle of proportionality of the analysis.

2) IAB scrutiny process

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<tr>
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<td>INFSO/H/3</td>
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<td>External expertise used</td>
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<td>Date of Board Meeting</td>
<td>Written procedure</td>
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