



### **(C) Main recommendations for improvements**

#### **(1) Separate regulatory failure issues from the revision of long-term objectives.**

While the report provides a better overview of the evaluation results of the current policy framework, it should nonetheless distinguish more clearly between problems that relate to the functioning of the current policy framework, and the need to revise long term goals as separate analytical issues. It should provide more clarity and a more comprehensive explanation of the underlying causes of: (i) why diesel emissions remain high; (ii) why small scale combustion and geographical conditions could not be adequately addressed by the current system, or under other on-going initiatives such as the Eco-Design Directive; (iii) why tackling agricultural ammonia emissions has so far been so difficult; and (iv) why the present interplay of national, regional and local Implementation regimes lead to lower compliance at higher compliance costs.

**(2) Improve the presentation of the scope of the package.** The report should clearly explain which of the remaining short-term and long-term gaps require measures at EU level, and which can be dealt with by Member States. It should further strengthen the logical link between the key short and longer term problems that the initiative aims to solve, and it should explain how they interact with other relevant EU legislation in force, upcoming initiatives and the regulatory frameworks in Member States. In particular, the report should clearly explain how this initiative relates in terms of substance and timing to relevant climate or energy policies, especially the announced Climate and Energy Package, and also to initiatives dealing with vehicle and ship emissions.

**(3) Provide more detail on the short term costs and benefits.** The revised report is more concrete about the expected costs and benefits of the options. However, it still needs to address more clearly the phenomenon whereby the quantification of costs and benefits appears to be much more comprehensive for the (more uncertain) post-2020 part of the initiative, than for the measures proposed to improve compliance with given requirements up to 2020. This discussion should explicitly focus on a detailed treatment of current implementation and compliance costs, and of the impact of the different options on those costs. The report should also discuss whether (other) options could be considered that would give more responsibilities to individual Member States.

### **(D) Procedure and presentation**

The report should elaborate less on the broad context, and focus as much as possible on the concrete problems, their drivers, and the impacts of the various options and of the overall package on these problems. The coherence of the relevant information distributed between the extended annexes and the main text should be improved by presenting precise references in the main text to relevant passages in the annex. The report should include a section explaining how the recommendations of the first IAB opinion have been incorporated in the revised report.

<b>(E) IAB scrutiny process</b>	
Reference number	2013/ENV/001
External expertise used	No
Date of IAB meeting	Written procedure.  An earlier version of this report was submitted to the IAB in June 2013, for which the Board issued an opinion on 3 July 2013.