



Brussels, 22 October 2007
D (2007) 3158

Opinion

Title **Impact Assessment on: Regulation on the approximation of the laws of the Member States with respect to emissions from on-road heavy duty vehicles and on access to vehicle repair information (Euro VI)**
(draft version of 9 October 2007)

Lead DG **DG ENTR**

1) Impact Assessment Board Opinion

(A) Context

The Thematic Strategy on Air Pollution establishes that more stringent emissions levels for heavy duty vehicles will be necessary – together with other initiatives – so as to achieve the air quality targets for 2020. In this context, the Council has called for a proposal from the Commission encompassing further measures concerning the emissions of heavy duty vehicles.

(B) Positive aspects

Using the TREMOVE model, the IA report provides a good example of monetising both (financial) costs and (environmental) benefits of the main policy options, thus enabling a transparent comparison.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG.

General recommendation: The IA needs some further clarifications, notably with regard to the composition of the set of emission limits and the rationale behind the selection of the preferred emission scenario. In the same perspective, the impacts of the additional measures which are included in the preferred option should be more thoroughly evaluated and clarified, since they are essential to achieve better control of emissions.

(1) The rationale behind the set of emission limits should be provided. The assessment of the optimal emission limits is conducted through the comparison of the different "scenarios", which are in fact sub-options. The IA report should explain how these specific scenarios were composed and why only these are examined. The Board notes the intention of DG ENTR to revise the draft IA on this point.

(2) The additional measures accompanying the preferred option should be better assessed. While the Board understands from DG ENTR that the TREMOVE model is not designed to evaluate the impacts of such measures, the IA report should in some other way describe in more detail their link with the overall objectives and with legislation in force, and provide a better assessment of their expected costs and benefits. Preferably this assessment should be integrated with the assessment of the costs and benefits of the emission limits, or alternatively the IA report should separately assess the combined costs and benefits. If relevant, this totalised overview should also identify any re-distributional economic and employment impacts and whether there is a specific importance for SMEs.

(3) The selection of scenario A as the preferred option should be clarified. The IA report should better explain why scenario A is taken as the preferred option, even if the calculations for 2030 (table 15) which seem to take account of all costs and benefits do not point in this direction. Furthermore with regard to the selection of options, the IA report should explain why a market-based approach such as that of the US (Averaging, Banking and Trading scheme) is not deemed feasible for the EU, and for that reason is not assessed. With regard to the option of "fiscal incentives by Member States" the IA report should explain how despite the negative appraisal and non-selection of this option these are still mentioned as accompanying measure. The Board notes the intention of DG ENTR to clarify these points.

(D) Procedure and presentation

The IA report should clarify if the roadmap been produced and made publicly available and if some internal consultation has taken place.

A summary of stakeholder views on the requirements to provide vehicle repair information should be added, especially considering the fact those earlier attempts to achieve international standards in this area failed.

2) IAB scrutiny process

Reference number	2007/ENTR/009
Author DG	ENTR F.1
External expertise used	No
Date of Board Meeting	Written procedure
Date of adoption of Opinion	19 October 2007