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**COMMUNICATION DE LA COMMISSION AU CONSEIL ET AU PARLEMENT  
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**Vers un réseau ferroviaire à priorité fret**

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Brussels, 26 July 2007  
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## Opinion

**Title**                     **Impact Assessment on the Communication on a rail freight oriented network**

**(draft version of 3 July 2007)**

**Lead DG**                   **DG TREN**

### **1) Impact Assessment Board Opinion**

#### **(A) Context**

The communication on a freight-oriented network is part of the ongoing EU policy to revitalise rail transport through the creation of a dynamic, competitive and sustainable Internal Market for rail cargo, as asked for in the 2001 White Paper on a Community Transport Policy and in its 2006 mid-term review.

#### **(B) Positive aspects**

The IA report contains clear and fairly concise accounts of both the fundamental problems and challenges facing rail cargo together with their key drivers, and the current state of play as regards the measures already taken on this policy field and their (intended) effects. The authors are commended for having considered comprehensive options that address the various dimensions of the problem through the objectives rather than having opted for partial options focussing on a few "ways forward".

#### **(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 report needs to be improved on a number of key aspects. In general, the analysis should give more attention to the time dimension of the issue and to the problems and impacts beyond the rail cargo sector. In particular, the extensive attention given to the specific objectives and content of the various options needs to be brought in line with the problem description and with appraisal of these options. This appraisal needs to be developed in a more rigorous way, going beyond presenting a number of negative and positive impacts for the**

various options. These recommendations have been largely accepted by DG TREN in its written response to questions posed by the Board. The IAB takes note that possible legislative measures in this field will be prepared through separate impact assessments.

**(1) The options should take better account of the time dimension of the issues at hand and of the strategic decisions at Community level as regards transport in general.** A better distinction of the short term and longer term is called for throughout the analysis, in particular, in the definition of the policy options. The longer-term perspective should take account of the very long time-span needed for investing in rail infrastructure across borders and in difficult topographies. The analysis would be reinforced by making explicit use of trends and trend projections of the volumes of the different cargo and passenger modes of transport. The planned and existing measures aimed at rail-passenger transport need to be reflected in the development and the appraisal of options, whereas for all options possible negative impacts on rail-passenger transport and the consequences of assumed measures to attenuate these impacts need explicit consideration in the appraisal.

**(2) The appraisal section should be made more systematic and transparent.** Firstly, the assessment should be more clearly and consistently based on the content of the options. Secondly, all estimates and appraisals need to be clearly underpinned with evidence, as a minimum through references to more elaborate analysis available elsewhere. Thirdly, the presentation of the impacts and the comparison of the options should be better structured, based on a systematic (qualitative) appraisal of effects, within and outside of the rail cargo sector. Finally, the appraisal should be extended on a number of aspects which seem highly significant for decision-makers (such as the impact on passenger transport, with and without attenuating measures; on number and quality of jobs; on regions and third countries; on the environment).

**(3) The analysis should elaborate the uncertainties and risks involved,** in particular as regards the risks and uncertainties related to the realisation of additional infrastructure (rail and otherwise) in the various options, drawing on experience gained so far in this policy field and sector.

**(4) The appraisal should take more account of trade-offs and synergies;** firstly, between the proposed action and the existing initiatives concerning rail cargo and the transport sector more generally; secondly between the various measures that make up the different options.

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

The minimum standards for inter-service and stakeholder consultation have been met. The current report follows more or less the standard format; it is recommended while revising the report to stay close to the size limit of 30 pages (as recommended by the Guidelines). Moreover, a short discussion of potential monitoring arrangements should be included, and the referencing to evidence outside the main text should be improved.

## 2) IAB scrutiny process

Reference number	2006/TREN/003 (Priority initiative)
Author DG	TREN
External expertise used	No
Date of Board Meeting	written procedure
Date of adoption of Opinion	26 July 2007