

administrative costs. Alternatives to a white paper as a policy option should be examined more fully. In the light of this, the IAB requests DG ENV to resubmit a revised version of the IA report, on which the Board will issue a new opinion.

(1) The baseline scenario needs to be clarified further. The IA needs to explain whether and how different scenarios would affect the most vulnerable sectors/regions (and how different scenarios would affect the policy choice); similarly the impact of uncertainties should be clarified. The IA should discuss in greater depth the interaction between two major strategies towards the climate change (adaptation and mitigation), their costs and impact on limiting cost of damage resulting from climate change. The problem definition should also be much clearer about the current knowledge gaps, and in the subsequent sections outline the measures to bridge them. Given that different forecasting studies have been used, the IA report should explain how their different underlying assumptions relate to the baseline scenario and explicitly discuss whether the effects presented for each sector would occur simultaneously, or whether impacts in one sector may affect developments in the other. It should be clarified whether the costs and benefits presented in the problem definition refer to the baseline scenario and their underlying assumptions, e.g. discount rates, should be discussed. The IA could also make a greater effort at analysing when the negative impacts of the baseline scenario would materialise.

(2) Objectives and policy options should be streamlined. The IA should clarify the distinction between objectives aimed at awareness raising and the objectives concerning actions with more concrete impacts. Given that the IA analyses a wide range of ambitious policy options but concludes that available evidence justifies a more limited initiative at this stage, other instruments than a white paper should be examined. The analysis at hand does not seem to allow concluding on some of the policy choices made (for instance policy options labelled F, or option G11); in such cases this IA report should not pre-empt conclusions from further analytical work.

(3) Subsidiarity analysis requires strengthening. The IA should make clear what would be the division between national/regional and EU action. The analysis behind the table on page 55 should be brought into the main text of the IA report.

(4) Analysis of impacts should be reworked. The IA focuses currently on the costs of climate change (and mal-adaptation). Benefits need to be taken into account as well, and the mixed impacts on certain sectors and regions presented with greater clarity. The IA needs to provide more clarity about the relationship between the timing of expected climate change impacts, adaptation costs and the timing of benefits (from adaptation). The IA should then use this to support the choice between actions that are proposed in the short run and those that may be contemplated at a later date, while clearly stating if and when further impact analysis will be carried out.

(5) EU budget implications should be further analysed. The IA should assess whether the EU budget available within the current financial perspective (i.e. until 2013) would be sufficient (with or without redeployment of funds) or whether additional funds would be needed. Similarly, implications for the MS use of EU financing should be made clear. The IA should establish whether new constraints (e.g. via guidelines) for the use of this funding would be introduced, what kind of constraints would result from the different environment in which the funds would operate (e.g. increased water scarcity) and what would be left to MS discretion (options for the MS to use funding for adaptation). Results of the CAP health check should be referred to more explicitly. The IA should abstain from making commitments concerning the next financial perspective.

(6) Impact on administrative burden requires a deeper analysis. Given the scope of uncertainties and the need to bridge the knowledge gaps, the IA should present in more detail the changes needed to the current reporting systems, clarify the role of the existing organisations

(such as IPCC or EEA) and discuss the need to create new ones. The interaction with national systems should also be clarified. Additionally, while a detailed assessment of changes with regard to information obligations will need to be done at a later stage, the IA report should nevertheless briefly discuss whether an overall increase of the administrative burden is expected and if so, who would in principle need to bear it (business or public authorities).

(D) Procedure and presentation

An attempt should be made to keep the length of the IA within the page limit. Following the distinction to be introduced at the level of objectives and actions (e.g. information actions vs. legislative changes) the IA report should provide an overview of further impact assessment work which is planned for individual policy areas.

2) IAB scrutiny process

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