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Opinion

Title **Impact Assessment for the Action Plan on Urban Mobility**

Version: 27 June 2008

Lead DG **DG TREN**

1) Impact Assessment Board Opinion

(A) Context

The Action Plan on urban mobility is part of the Commission's work programme for the year 2008 with reference 2008/TREN/036. The Action Plan on urban mobility follows the publication of a Green Paper on urban mobility on 25 September 2007. The responses to the Green Paper showed that there was broad agreement that the EU-level should play a role in this area but different views existed concerning what this role should be and the actions to be taken at the EU-level. The IA is aimed at clarifying these things.

(B) Positive aspects

The problem definition provides a good general recapitulation of the issues afflicting urban mobility. The IA contains a noticeable effort to integrate in a complimentary way quantitative, model-based analysis with qualitative considerations. Discussions with DG TREN have clarified that the IA attempts to identify proportionate actions that have to be taken at the EU-level.

(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 and are expected to be incorporated in the final version of the impact assessment report.

General recommendation: The IA should be strengthened considerably across a number of aspects. Given the issues affecting urban mobility, the IA ought to improve its analysis of how the EU-level can contribute to finding solutions for what are often local problems. The level of ambition as regards actions to be taken at EU-level requires further consideration and explanation. The IA should develop a clear

baseline against which the costs and benefits of having an Action Plan can be discussed. There is a need for better joining up the individual parts of the IA, from problem definition to objectives and options. Furthermore, the IA should clarify the content of the Action Plan, examine the possibility of packaging the envisaged actions, and analyse its overall impact against the baseline scenario. During its meeting with the Board DG TREN provided a number of useful clarifications and agreed to modify the IA accordingly.

As the required changes are substantial and affect various parts of the IA, it is recommended that a revised version of the IA is submitted to the Board. Furthermore, given the nature of the changes, the IA Board recommends further collaboration with the inter-service steering group.

(1) Improved identification of the role the EU-level can play. The baseline should be clearly defined and include other policy actions such as ITS. The problem definition should then clearly identify those issues that might require public intervention at the EU-level. That includes a more thorough explanation of the level of ambition of the possible action plan, e.g. whether it follows a soft approach or more concrete action, to allow for a better understanding of why the proposed action is proportionate given the size of the problem and the value-added of EU intervention. In this context, the IA should analyse more thoroughly the problems to do with fragmentation across the EU by taking into account that there is also fragmentation of approaches between urban areas *within* Member States.

(2) A better link between the individual parts of the IA. The individual sections of the IA should be joined up in a much more coherent way to establish a clear line of argument from problem definition through to objectives and options. A revised problem definition as suggested in (1) should be followed by reworked objectives that reflect the key issues for which action at EU-level can help provide a solution. It is recommended that the objectives are structured as a hierarchy, with the specific objectives in particular providing a clear link back to the key issues identified in the problem definition.

(3) More clarity about the content of the Action Plan. The content of the action plan should be presented much more clearly, linking the actions with the previous sections, so that it is evident to which problem and objective individual actions refer. The description of the Action Plan should state unambiguously whether it is about constructing a framework to prevent fragmentation of approaches across the EU by means of a soft approach and/or what concrete legislative actions are envisaged and when. If possible, a packaging of the actions should be envisaged. How that framework is to be applied and the nature of its elements, i.e. voluntary or mandatory action, should be clarified.

(4) An analysis of the expected benefits and costs (or pros and cons) of the Action Plan. The IA should then analyse the impacts of the Action Plan and compare them against the baseline scenario. While it would be disproportionate to provide a detailed cost benefit analysis of each proposed action at this stage, the analysis should focus on its overall impact. It should be stated if/what further IA work is planned and when.

(D) Procedure and presentation

It appears that all necessary procedural elements have been complied with.

2) IAB scrutiny process

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