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Opinion

Title

Impact Assessment for the Action Plan on Urban Mobility

Resubmission

Version: 15 September 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. It is a follow up to the Green Paper on urban mobility of 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.

(B) Positive aspects

The IA has been reworked in view of the Board's previous opinion. There is now a clearer understanding of what the action plan is aimed at and regarding the actions that are being proposed. The links between the different chapters of the IA have been strengthened. The IA clearly alludes to the often diverging views of stakeholders on a number of the options that are being proposed.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments already transmitted on July 11th 2008 directly to the author DG are expected to be incorporated in the final version of the impact assessment report.

General recommendation: The IA requires further strengthening, particularly as regards the contents of the baseline, costs of the lack of harmonisation, the value added from EU level intervention and the proportionality of the proposed actions, especially if the intention is further regulatory action in the coming years. The IAB is still concerned that the individual actions on the list have not been explicitly assessed against the baseline and that it does not allow for a choice between alternative options. It is also still rather unclear to what extent their implementation would contribute to solutions that contain real EU added value. As the required

changes are substantial, the Board requests that DG TREN submits a revised draft of the IA report on which a new opinion will be issued.

(1) Improved identification of the role the EU-level can play. Although the IA now contains a short description of the local and regional trends in addition to the description of the European trends, the baseline should be further improved by assessing more thoroughly recently adopted measures affecting urban mobility (e.g. the "Greening Transport Package", Air Quality Directive). The problem definition section should be more concrete by identifying more explicitly tangible gaps and shortfalls of existing policies affecting urban mobility and should on that basis better substantiate the need for an action plan. The reasoning that the actual issues are better dealt with at EU rather than at national level should still be further strengthened. The lack of a harmonised approach across the member states is cited as causing real costs to businesses such as delivery services and impeding the free movement of people. As this would be a main reason for EU action, the IA should substantiate these claims with quantitative evidence. However, the IA fails to explain why member states often do not have a harmonised approach even at national level. A useful analysis would consist of looking at the situation in those member states where national rules exist and comparing it with member states in which a more localised approach is taken. It is also not obvious why local solutions would not be preferable given the potentially high costs of congestions charging systems, which might be reduced by adopting local solutions, and the IA fails to address the innovation potential that arises because of competition between different systems and approaches. All of this weakens the arguments in favour of the option with EU led harmonisation action.

(2) An analysis of the expected benefits and costs (or pros and cons) of the Action Plan. The IA should further strengthen the analysis of the pros and cons of the individual proposed actions against a baseline. The absence of any alternatives to the actions being proposed means that one is presented with a take it or leave it package, whose only alternative seems to be the long list of actions that was reduced on the basis of a (not very transparent) screening process on subsidiarity in the first instance and then efficiency, effectiveness and consistency considerations. Most of the retained actions are of a non-regulatory nature, but a number of them hint at further regulatory proposals. The IA would further benefit if more differentiated options could be developed and assessed. Given the diverging opinions amongst stakeholders and the fact that some of the actions build on regulatory action that is not yet fully implemented, let alone evaluated, there is a need for further demonstrating the usefulness of EU action at this point in time.

(D) Procedure and presentation

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

2) IAB scrutiny process

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