



### **(C) Main recommendations for improvements**

*The recommendations below are listed in order of descending importance.*

**General recommendation:** While the energy efficiency monetised impacts are given for each sub-option, the IA would benefit from discussing more systematically the difference in and trade-offs between the other economic and social impacts for the sub-options, and for different timelines. Basic assumptions in the scenarios employed need to be shown. The impact of planned changes to the existing policies (WEEE, RoHS, EPBD) need to be discussed. Finally, the costs and benefits, impacts on administrative costs, jobs, consumer expenditure and on SMEs need to be presented more systematically.

#### **Specific recommendations:**

**(1) The baseline scenario should be clarified.** While the IA is quite transparent on the major assumptions regarding the baseline scenario, more detail is needed on issues such as assumed energy mix, electricity prices, and global demand. The IA needs to be clearer about the confidence level for major assumptions and whether changes in any of the main parameters would affect the final policy choice. Such sensitivity analysis should also include planned changes to the WEE, RoHS and EPB directives, in particular given that these were subject to impact assessments.

**(2) The IA needs to explain the scope of the implementing measure.** The report should clarify the implications of the implementing measure for products other than those specified for minimum standard requirements (such as LED or any other emerging products). The reasons for splitting the implementing measure between directional and non-directional lamps should be presented.

**(3) The analysis of impacts needs to be upgraded.** Firstly, the IA needs to present costs and benefits separately and consistently for all policy options, including impacts on consumers, and for the relevant timelines. Monetised energy savings should be presented in terms of net costs instead of running costs for each sub-option (p. 45). Secondly, an order of magnitude for the likely job impacts should be quantified for all policy options, preferably with a clear distinction between larger producers and SME producers (and presented clearly in the table summarising the impacts of different options). Thirdly, given their different impact on health, mercury emissions from power generation and mercury use in products, should be presented separately. The IA should also assess whether the waste management system will be able to cope with an increased use of the mercury in lamps. In this context the role of the mercury benchmarks needs to be clarified as well as the assessment of life cycle environmental impacts. Fourthly, the IA should include at least anecdotal evidence on how the proposed timetable for introducing the ban fits into business investment cycles (for all businesses affected and not only the lamp industry) and to what extent sunk costs can be alleviated by exporting the incandescent (GLS) bulbs to third countries. To that end, a more systematic analysis of different scenarios regarding timing and scope of introduction stages would be useful. The analysis of the impacts should include a more thorough assessment for each option of the availability of substitutes for consumers and the impacts of needing to replace existing luminaires. Finally, the report should make clear whether the measure will give rise to any administrative costs and if these are significant, they should be assessed using the EU Standard Cost Model.

**(D) Procedure and presentation**

The IAB regrets that the inter-service consultation was launched before the IAB issued its opinion on the IA. The IA should be a self-standing document: key assumptions from background studies need to be included in the main text, in particular where they have a bearing on the final policy choice. A glossary and list of acronyms would help.

**2) IAB scrutiny process**

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