



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

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Opinion

Title

Impact Assessment for the Action Plan on Urban Mobility

Resubmission

Version: 22 October 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 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 could play a role in this area but different views existed about what concretely this role should be and thus concerning the actions to be taken at EU-level.

(B) Positive aspects

The IA has undergone noticeable redrafting and further work as a result of the IAB's opinions on the previous two drafts. The nature and level of ambition of the action plan have been presented in a more realistic way, and there is a more balanced description of where there can be value added from EU level involvement. Further positive aspects are the improved links between the different chapters of the IA and the transparent account of the often diverging views of stakeholders.

(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: While improvements are noticeable, the IA would benefit from some further work. Those efforts should concentrate on further substantiation of the costs and benefits of EU level driven harmonisation (whether of a regulatory nature or not) and on providing additional clarity concerning further IA work prior

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to the implementation of some of the proposed actions.

The IAB regrets that more detailed analysis of costs and benefits of EU involvement and the development of real alternative options was not possible.

(1) Further substantiate the need and degree of EU-level action. The evidence stressing the costs of lack of harmonisation (independently of how it would be achieved) would benefit from further substantiation in addition to the Dutch study that is already cited. It would also be useful to investigate why these costs have not led to more harmonisation at least within Member States and how Member States that have harmonised rules compare with those that do not have them. While the analysis of the benefits and drawbacks of standardisation is generally sound, the analysis should be extended to show whether there are more benefits or detriments from the prevailing lack of harmonisation. In other words, the IA should demonstrate that the benefits from harmonisation in terms of, for example, economies of scale or lower market entry barriers outweigh the potential costs of foregoing innovation driven by competition between approaches and technologies. Specific objective 1 on avoidance of incoherent local solutions and the linked monitoring indicator should be reconsidered in the light of this analysis.

(2) Provide clarity on future approaches on implementing proposed actions. The IAB regrets that more differentiated options could not be developed and assessed and would welcome any possible further effort in this direction. The absence of any alternatives to the actions being proposed means that one is presented with a take it or leave it package. Most of the retained actions are rightly of a soft nature, but a number of them hint at further regulatory proposals. The IA must clearly state what further IA work is planned and expand on the wording contained in section 6.3. More concretely, the IA report should explicitly state that actions 2,7,8,10,12 and 20, all announcing Commission recommendations, will be preceded by separate IAs. The report should also indicate that the implementation of action 9 (web portal) will be subject to confirmation of its importance relative to other Commission priorities in the field of informatics by the College.

(D) Procedure and presentation

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

2) IAB scrutiny process

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External expertise used	No
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