



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels, 28 AVR. 2009  
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## Opinion

### Title

**Impact Assessment on: Regulation to reduce CO2 emissions from light commercial vehicles**

**(draft version of 3 April 2009)**

### Lead DG

**DG ENV**

## 1) Impact Assessment Board Opinion

### (A) Context

The initiative is a follow up to the 2007 Commission review of the Community Strategy to reduce CO2 emissions from passenger cars and light-commercial vehicles. It was initially intended as part of an integrated approach to delivering a 10g contribution to the 120g/km target set for 2012.

In the legislative process on passenger cars, a long term target of 95g/km has been introduced.

### (B) Positive aspects

The report is consistent with the methodology applied in the Impact Assessment on Regulation of CO2 emissions from cars. It provides a clear analysis of impacts on producers, and potential price increases for the end-users.

### (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 impact assessment should assess potential effects of pooling the CO2 reduction targets for cars (M1) and light commercial vehicles (LCVs) in more depth, including impacts on the current market structure and on administrative burden. Implications of the changes introduced by the Legislator to the regulation on cars, which were not assessed in the corresponding IA, should be discussed more explicitly. The potential impact on the external competitiveness of EU car manufacturers should be analysed more fully. During the IAB meeting, DG ENV agreed to revise the IA along these**

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**(1) The analysis of pooling and the effects on competition in the LCV market should be strengthened.** The IA should discuss the effects of pooling on the level of excess premium and the potential impact on reaching the policy objectives for both types of vehicles. A potential impact on creating an advantage for manufacturers producing both cars and vans should be discussed in more depth. Additionally, the IA should present costs to manufacturers (and not only to the end-users of vans).

**(2) The policy context needs to be clarified.** The IA should be more explicit about the changes introduced by the Legislator to the Commission proposal on regulating CO<sub>2</sub> emissions from cars, and the impact this may have on regulating the CO<sub>2</sub> emissions from vans and, more generally, on the integrated approach. The contribution of the proposed measures to the 2020 CO<sub>2</sub> reduction targets should be made more visible in the IA, and compared to other adopted or planned measures (e.g. rolling resistance of tyres, fuel, etc).

**(3) The IA should discuss the impact on the global market in greater depth.** Given the high volatility of the oil price and its effects on the demand for more fuel efficient cars, the IA should add a brief overview of policy measures taken up in other countries (Japan, US, China, etc) aimed at reducing CO<sub>2</sub> emissions or improving the fuel efficiency of vans. The requirements for the importers of vans to the EU need to be clarified.

**(4) The potential impact on administrative costs needs to be more thoroughly discussed.** The IA should explain whether there will be any new information obligations imposed either on public authorities or on business, or to what extent data currently available in type approval, registration and certificate of conformity would suffice. In particular the impact of introducing an excess premium on vans and pooling should be assessed. A distinction should be made between one-off and recurrent costs. If these new administrative costs are considered to be significant (either on business or on public authorities), they should be estimated using the EU Standard Cost Model.

#### **(D) Procedure and presentation**

It seems that all procedural requirements have been met. The major figures, such as costs for manufacturers, price increases for end-users, overall social benefits, etc., should be clearly presented in the main body of the IA report and in the executive summary.

## **2) IAB scrutiny process**

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