



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

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

**General recommendation:** The report has been improved on a number of issues. There remain, however, some areas where further clarification is necessary. The report should provide further detail on the functioning and organisation of the network of safety investigators which is the preferred policy option. It should develop further the analysis of the risks associated with implementation of this option and possibly mitigating measures. It should be more specific about possible administrative burden expected for the Member States (for all options). Finally, it should specify whether the problems identified concern all or only some of the Member States.

**(1) Be more specific about the functioning and organisation of the preferred option and about the additional administrative burden expected under the different policy options.** In particular, given that the creation of a network will be supported by an annual grant from the Community budget, an ex ante evaluation should be included in this impact assessment or provided separately. Also, given that some of the options imply additional costs for the Member States and National Safety Investigation Authorities (p. 61, 62), the report should provide an approximate scale of these costs, and indicate whether there will be new reporting requirements and possible administrative burdens.

**(2) Address further the inefficiencies of the current civil aviation investigation framework, and the reasons for the unsatisfactory implementation of the current directives.** As recommended in the previous IAB opinion, the report needs to distinguish between the general problems concerning the Community and those related to specific Member States. While the problem definition section makes clear that the problems identified are to a large extent linked to the structural changes in the internal civil aviation market, it should clarify whether the problem of tensions between safety investigations and other judicial proceedings and the problem of weakness of implementation of safety recommendations concern all or only some of the Member States.

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

The different views expressed by the stakeholders on the proposed options are presented more clearly in the resubmitted report. The length of the report should be considerably shortened to bring it closer to the recommended maximum of 30 pages. Given that the impact assessment has been substantially reworked, the report should specify whether the inter-service steering group has been consulted on the revisions that have been made.

## 2) IAB scrutiny process

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External expertise used	No
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Date of adoption of Opinion	26 August 2009  The present opinion concerns a resubmitted draft IA report. The first opinion was issued on 30 June 2009.