



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

22 OCT. 2010

Brussels,
D(2010)

Opinion

Title

DG ENTR - Impact Assessment on: Proposal for a Directive of the European Parliament and of the Council amending Directive 2000/25/EC as regards the provisions for entry into force for narrow-track tractors

(draft version of 24 September 2010)

(A) Context

The tractors emissions Directive 2000/25/EC, amended by Directive 2005/13/EC, regulates the exhaust emissions from tractors, including narrow-track tractors (NTTs) used in vineyards and orchards. Through a staggered time schedule, the currently applicable level of emission limits – Stage IIIA – should be progressively replaced by more stringent Stage IIIB and Stage IV limits. Current engines need to be re-designed to comply with new limits, and this requires further technological developments. This impact assessment accompanies the proposal to delay the entry into force of next emission stages for NTTs.

(B) Overall assessment

The report provides the evidence base necessary for action in this area, although several aspects could be improved. First, the report should clarify to what extent the unavailability of Stage IIIB and Stage IV compliant NTTs can be attributed to lack of technical solutions rather than to possible regulatory failures such as ineffective implementation or inadequate flexibility scheme. It should consider presenting the extension of flexibility arrangements for transition as an option. It should also provide further details about technological issues at stake. Secondly, the report needs to be clearer about the baseline scenario used as a benchmark for comparing the impacts of different options. Thirdly, the report should strengthen the assessment of impacts, in particular by addressing the impacts on health and work safety, and discussing in greater detail the expected impacts of options on the transition to Stage IV.

(C) Main recommendations for improvements

(1) Discuss in greater detail the lack of technical solutions that would allow NTTs manufacturers to meet the next emission stages. The report should discuss further the

technical feasibility problem, and clarify to what extent the unavailability of Stage IIIB and Stage IV compliant NTTs can be attributed to lack of technical solutions, and to what extent to possible regulatory failures such as ineffective implementation or inadequate flexibility scheme. Against this background, it should clarify whether extending flexibility arrangements for transition between the different emission stages could be a feasible option. The report needs to explain if the lack of technology affects all the NTTs manufacturers, or if on the contrary there are manufacturers likely to produce the stage IIIB compliant NTTs on time who would thus be disadvantaged by postponing the application of next emission stages. The report should also discuss the relevance of the possible substitution effect from high power NTTs to low power NTTs which are not subject to Stage IIIB and Stage IV requirements.

(2) Clarify the baseline scenario and comparison of options. The report needs to be clearer about the baseline scenario used as a benchmark for comparing economic, social and environmental impacts of different options. A clear distinction should be made between the baseline scenario which corresponds to a situation where NTTs complying with Stages IIIB and IV would not be available, and the hypothetical scenario reflecting compliance with Stages IIIB and IV used for comparing environmental impacts of the options. The assumptions on which these two scenarios are based should be explained, for example the assumptions on the availability of Stage IIIA tractors, the job losses, or the preparedness of NTTs manufacturers to meet the requirements of next emission stages. The table comparing the options should be revised so that the scores in the table are in line with the appraisal in the text.

(3) Strengthen the assessment of impacts. The issue of health and work safety should be addressed in all the options, and the report should clarify the relative importance of these issues compared to other expected impacts, such as impacts on emissions. It should discuss in greater detail the impacts of different options on the transition to Stage IV, for example in terms of expected R&D spending, and on innovation and competition. In addition to the assessment of impacts on NOx and PM emissions, the report should make clear whether impacts on CO2 and HC emissions are expected and/or relevant. Finally, the report should be clearer about possible measures envisaged under option 2 to mitigate negative environmental impacts on Northern Italy.

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.

(D) Procedure and presentation

The report should clarify if environmental organisations expressed views on delaying the entry into force of more stringent emission limits for NTTs, and report on the meeting with industry organised in September 2010.

(E) IAB scrutiny process

Reference number	2010/ENTR/011
External expertise used	No
Date of Board Meeting	20 October 2010