



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

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Brussels,  
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## Opinion

**Title**                      **Impact Assessment on the White Paper on Transport (draft of 20.12.2010)**

### **(A) Context**

One of the flagship initiatives of the EU 2020 strategy concerns the shift towards a resource efficient and low-carbon economy. The White Paper on Transport Policy accompanied by this impact assessment report falls within the scope of this flagship. It also builds on the 2006 mid-term review of transport policy that has shifted the focus towards co-modality, i.e. the efficient use of different modes on their own and in combination as the optimal way to achieve a sustainable utilisation of resources.

### **(B) Overall assessment**

**The IA report as it stands does not provide a clear analysis of the transport policy choices available to reach the carbon emission reduction target. It requires further work on several important aspects. Firstly, it should better explain how it builds on the evaluation of existing policies to better demonstrate the lessons learnt. Secondly, it should define more clearly the concept of sustainable mobility, and explain how this is reflected in the definition and prioritisation of objectives. Thirdly, it should provide more clarity on the design, content and differences between the options, and the features they have in common. Fourthly, it should provide much greater clarity about the assumptions underlying the modelling results, the cost concepts used and the cost figures, especially as regards the concept of 'total transport costs'. Finally, the report should provide a global assessment of the total investment needs and the most affected industrial sectors, social groups and regions, and differentiate better between short, medium and longer term impacts.**

**Given the nature of these concerns, the IAB requests DG Mobility and Transport to submit a revised version of the IA report on which it will issue a new opinion.**

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

**(1) Explain better how the report builds on the evaluation of existing policies.** The report should better integrate the conclusions from the evaluation of existing transport policies (as summarised in Appendix 2) into the problem definition. It should indicate, for those policy areas where existing policies have not proven sufficiently effective, how

lessons learned have been reflected in the objectives and option definition. The baseline projection should better take into account the achievements and deficiencies of current policies.

**(2) Provide a clear definition of sustainable mobility, and indicate how this is reflected in the objectives.** The report should provide a clear definition of the key concept of sustainable mobility and clarify its link to the general objective for this White Paper (e.g. determining the contribution of the transport sector towards realisation of the carbon emission reduction target). The report should also clarify to what extent there will be prioritisation among lower-level objectives to achieve the general objective, given there are trade-offs between some objectives (e.g. between improving access and minimising externalities due to congestion, accidents and pollution).

**(3) Present the content of and differences between policy options more clearly and explain how they will achieve the reduction target.** The presentation of the policy options should provide greater clarity on how the seven policy areas (p. 24) and the measures listed in the table on p. 26 were identified, explain the specific measures as summarised in Figure 5 (pp. 34–37) in more detail, clarify how these measures were clustered into the three policy change options and briefly explain how they will achieve the reduction target. The report should clearly indicate the elements common to and the differences between the options. This should include an explanation that all options contain a mix of market-based, regulatory and technology-based elements, with differences in emphasis. The report should clarify how these differences have been reflected in the modelling.

**(4) Provide full transparency about the assumptions underlying the modelling results.** The report should provide greater clarity about the key assumptions that have been made in the modelling exercise, such as the assumed fuel price elasticities. Sensitivity analysis should be applied to assess the robustness of the results for reasonable variations in these assumptions (e.g. underlying GDP growth, oil prices, feasibility of electrification of transport, technology improvement, and revenue recycling). It should clarify the effect of different assumptions with regard to revenue recycling on expected costs and benefits. The report should also clarify which renewable energy sources will play a greater role in transport. Overall the modelling effort should be much better embedded in the narrative, especially concerning the assumptions underlying the baseline scenario, the analysis of the options, and the presentation of the final results.

**(5) Present clearer cost figures, and indicate who will be affected most.** In presenting the modelling results the report should clarify some of the concepts used with regard to the aggregate cost figures (such as 'total transport costs' and 'mitigation costs') and in particular specify the various underlying cost categories. It should clarify whether the social cost figures include taxes, capital costs and reductions in negative externalities (cf. par. 132), and should avoid double-counting that might result from also including the latter items as 'co-benefits' in the comparison of options. The report should provide further global figures on total investment needs under the different options. In view of the likely uneven incidence of specific transport-related problems across Member States and different regions/industry sectors the report should give a first indication which industrial sectors, social groups, and regions will be most affected by the proposed policies.

*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**

All procedural requirements appear to have been respected.

**(E) IAB scrutiny process**

Reference number	2010/MOVE/002
External expertise used	No
Date of Board Meeting	26 January 2011