

particular for cases where they differ from the ones that would have been established on the basis of least life cycle costs. This justification should be provided for all major 'parameters' such as energy consumption, noise, and refrigerants.

(2) The report should demonstrate more clearly how the proposed requirements compare to those in other major markets and explain why they differ. The report should provide a clear explanation of how the proposed measures would relate to those which have already been set in the other major markets, for instance, by referring to these requirements when discussing the policy options. This should be done for each of the major issues/requirements, such as power use, use of refrigerants with lower global warming potential, and noise.

(3) The report needs to justify more fully the idea of a 'bonus' aimed at promoting the use of refrigerants with lower global warming potential. The report should explain more fully how the level of the bonus has been established, its potential effects on CO2 emissions, and uncertainties around the methodology applied to calculate the impact on the energy use and CO2 emissions. This should be done by incorporating elements from annex 4 into the main text, adding sub-options on the size of the 'bonus' and discussing their impacts. It should be made clear why a 10% bonus is preferred while it appears that a 5% bonus would lead to lower total CO2 emissions. The report should also clarify whether the bonus would be applicable for a limited time only, and if so provide the rationale for that. Finally, the report needs to clarify how the effectiveness of this instrument will be monitored.

(4) The IA should provide further clarification with regard to social impacts. First, given the expected price increase of air conditioning equipment, the impact assessment should include a more thorough analysis of affordability for the final consumer. For this purpose, the IA report should clarify who are the buyers – e.g. private consumers vs. businesses – as well as discuss substitution options for low income households and potential health impacts. Secondly, the potential effects on employment in the EU need to be assessed more carefully, given the small scale of the industry in the EU, and the expected price increase that can impact negatively on demand for new appliances, while at the same time increasing demand for servicing.

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 be shortened by avoiding repetitions (e.g. on pp. 25-26) and by replacing the table on pp. 35-38 with a shorter, more reader-friendly one.

(E) IAB scrutiny process

Reference number	2010/ENER/017
External expertise used	No
Date of IAB meeting	Written procedure