



views in the problem definition. The report should account for the absence of more formal evaluations of the existing legislative framework, and should explain why considerations of fraud or deception in connection with the trade in used vehicles have been omitted from the analysis. The baseline scenario should be presented as part of the problem definition, and should include expected developments as a consequence of the entry into force of the two mentioned Directives in 2013.

**(2) Better explain the content and expected impacts of the options.** The report should provide an overall assessment of all relevant costs and benefits for the options presented, including for the package of preferred options. It should include a more detailed assessment of the impacts of option 1 on the second-hand motor vehicle market. For option 2b and 2c, the report should clearly explain in which Member States the roadworthiness test will have to be carried out, and how Directive 2009/40/EC on roadworthiness testing will be applied in this situation. It should also take into account the scenario according to which people buy their car while abroad and take it back to their country of origin. For option 3b, the report should provide more detail on the simplified procedure for cross-border sales, specifying whether there will be any deadline for re-registering the car for the buyer and whether the time lag between the sale of the car and its de-registration will be longer than in the baseline scenario.

**(3) Improve the comparison of the options in terms of effectiveness, efficiency and coherence.** The report should present an integrated overview of all relevant costs and benefits, in quantitative or monetised form where feasible and appropriate. It should compare the options on the basis of the criteria of effectiveness, efficiency and coherence, where possible taking into account the distribution of impacts over different categories of stakeholders.

**(4) Clarify the future monitoring and evaluation arrangements.** The report should more clearly indicate how the information exchange systems in option 5 would allow MS to easily obtain statistics on the implementation of options 2b and 3b. Additionally, the report should outline plans for the future evaluation of this Directive and its implementation, by presenting a provisional timeline, concrete criteria for evaluation and an indication of the actors that should be involved.

*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 better explain the sensitivity analysis (section 6.4) and justify the assumptions for the chosen values. The executive summary should be modified in line with the recommendations concerning the main report, and it should include a section on Monitoring and Evaluation.

#### **(E) IAB scrutiny process**

Reference number	2011/ENTR/010
External expertise used	No
Date of IAB meeting	Written procedure