

the problems and proposed measures relate to these, including the Energy Performance of Buildings Directive and the Energy Services Directive.

(2) Strengthen the baseline scenario and the justification for EU intervention. The report should present a better justification for EU action by more clearly demonstrating, with concrete evidence, how the criteria for such action (significant sales volumes, environmental impact and significant improvement potential) have been satisfied. The report should address more convincingly why the market failures cited will not be addressed over time by the market itself. The report should improve the description of the baseline scenario in a way that more clearly demonstrates what would happen without additional measures being taken

(3) Improve the assessment of impacts. The report should clarify the extent to which the proposed requirements would imply a full alignment with the existing third country Minimum Energy Performance Standards or go beyond them and what the corresponding impacts (including competitiveness) for EU producers would be. The report should also clarify how the benefits (reduced CO₂, reduced energy consumption, increased affordability, etc.) associated with each of the options are calculated, including the assumptions underlying these calculations and the sources of data. A more detailed assessment of the impacts on consumers and industry players (including SMEs) of the phasing out of current lamp models, which may have to be removed from the market as a consequence of the imposition of new standards, should be included. The report should discuss in greater depth the proportionality and potential risks of the imposition of quality standards in a relatively immature and developing market and assess the impacts on different types of manufacturers and retailers, including a presentation of stakeholder views on the issue.

(4) Be more specific on the evaluation arrangements and the results of the stakeholder consultation. The arrangements for monitoring and evaluation should be more fully elaborated, including the indicators that will be used to measure progress in implementation of the proposed measures, and the timing of future evaluations to ensure that. The report should integrate the different views of key stakeholders on key points throughout the text.

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 drafted in a less technical manner in order to make it more accessible to the non-specialist reader. The Executive Summary should be revised in line with the requirements of the Impact Assessment Guidelines.

(E) IAB scrutiny process

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External expertise used	No
Date of IAB meeting	5 October 2011 Written Procedure