

(C) Main recommendations for improvements

(1) Strengthen the problem definition and the baseline scenario. The report should present the initiative in the international context and better explain its link to the foreseen type-approval measures. It should clarify the room for manoeuvre in increasing the weights and dimensions of HDV by comparing the current limits of the Directive to the technical constraints of the existing infrastructure. The report should provide a detailed description of the situation in different Member States and make better use of all the collected evidence. On this basis, it should further demonstrate the magnitude of problems (including the internal market and environmental dimension) for economic operators, truck drivers and public authorities. In concrete terms, the report should: (i) show that the current Directive indeed hampers innovation and modal shift from personal to public transport; (ii) analyse in greater depth the administrative burden related to the use of 45' containers and problems of combined vis-à-vis intermodal transport; and (iii) substantiate the claim that different levels of enforcement across Member States distort competition in and functioning of the internal market. The report should then strengthen the baseline scenario by including quantitative data for all the key variables (such as fuel and carbon prices, fuel consumption) and by indicating future developments related to the weight of vehicles, containerisation, infrastructure, transport routes, enforcement etc.

2) Better explain the options. The report should better explain the rationale, content and relationship among the identified policy measures. For example, it should clarify how the mandatory filtering of vehicles for checks would be done and why the allowance for longer cabins envisages a lead implementation time. It should also clarify why standards for on-board weighing devices are not part of the baseline, or if the request for delegation related to large containers can be considered as a feasible policy measure. The report should justify the limited range of alternative measures retained for further analysis and provide more in-depth justification for discarding measures that would more significantly change the existing provisions of the Directive (such as increasing the loading capacity of trucks or allowing giga-liners). Finally, further information on the envisaged financial support for SMEs needs to be provided.

3) Better assess and compare options. The report should improve the assessment of impacts by combing the qualitative and quantitative analysis and by justifying the underlying assumptions. It should clearly acknowledge the uncertainties and limitations of data and, on that basis, present the expected impacts with more caution. For example, the report should indicate the foreseen uptake of on-board weighing devices (if not made mandatory) and explain to what extent the expected investment in aerodynamic devices (around EUR 3000 per vehicle) may be too burdensome for micro-enterprises despite its, presumably short, payback period. The impacts on Member States (particularly in view of the envisaged common enforcement rules), SMEs and competitiveness should be analysed in greater depth and the reduction of administrative burden for economic operators should be quantified to demonstrate the cost reduction potential of the initiative. In order to provide a clear overview of total costs and benefits of the preferred option (including significant but non-quantified impacts, if any), the report should clearly compare each policy option against the baseline scenario in its entirety and indicate the referenced cost/benefit ratios. Finally, the assessment of effectiveness of policy options should better correspond to the impact analysis while more prominently addressing the trade-offs related to road safety, modal shift or rebound effect.

(4) Better present stakeholders' views. The report should clarify on which elements of the report (i.e. problem definition, subsidiarity, policy options, impacts) stakeholders were consulted and present their views explicitly throughout the text. In doing so, it

should differentiate between the categories of stakeholders (including views of SMEs, Member States/national enforcement and budgetary authorities, social partners in road transport/truck drivers etc.) and clearly indicate when their views are conflicting.

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 identify benchmarks against which the operational policy objectives will be evaluated and clarify how the impact on the infrastructure, road safety and the environment is going to be monitored. The executive summary should follow the structure of the impact assessment report, including the assessment of the policy options and the views of stakeholders.

(E) IAB scrutiny process

Reference number	2012/MOVE/013
External expertise used	No
Date of IAB meeting	17 October 2012