

Scrutiny of recent Inception Impact Assessments: revisions of the Energy Efficiency Directive and Renewable Energy Directive

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The Impact Assessment Institute has scrutinized two European Commission Inception Impact Assessments (IIAs), published in August 2020, on the revisions of the Energy Efficiency Directive and the Renewable Energy Directive.

Our analysis has identified substantial concerns due to prejudgment of preferred outcome, absence of coherent policy options and unbalanced assessment of expected impacts.

Key: **Xx** = no material issues identified; **Yy** = issues identified; **Zz** = significant issues identified

IIA title	<u>Review of the Directive 2012/27/EU on energy efficiency</u> <u>[Evaluation Roadmap/IIA]</u>	<u>Revision of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources</u>
<i>Context and problem definition</i>	Generally comprehensive, but rationale for linking energy efficiency with post-Covid economic recovery is unclear	Full overview of the policy framework, but problem definition does not provide references to back up assertions and prejudices impacts before presentation of evidence
<i>Objective(s) and policy options</i>	Objectives exceed scope of problem definition and seem to anticipate preference for one policy option; policy options repeat objectives instead of presenting outline of options	Main objectives clearly identified but several measures are prematurely presented in this section. Policy options are mostly a statement of objectives instead of an indication of specific policies.
<i>Assessment of expected impacts</i>	Analysis assumes only positive economic and employment impacts alongside environmental benefits, before compilation of evidence	Analysis assumes only positive impacts on economic growth and employment before compilation of evidence. This section mostly presents the current situation and data instead of assessing the potential impacts. Competitiveness dimension and environmental impacts other than emissions are not addressed.
<i>Background data and sources</i>	References to economic and sectoral modelling tools as well as consultation appear comprehensive,	Sources of background data not identified; consultation plan fully outlined

	although other sources of evidence base could be additionally relevant	
<i>Alignment with Better Regulation guidelines (timeline and procedures)</i>	Aligned	Time to legislation (8-10 months) aligned. Exclusion of initiative from REFIT programme does not comply with guidelines, as simplification potential is identified in the text.