

Scrutiny of recent Inception Impact Assessments: emissions, ozone and fuels infrastructure

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The Impact Assessment Institute has scrutinised the European Commission Inception Impact Assessments on the revision of the Industrial Emissions Directive, the revision of EU rules on ozone layer protection and the revision of the Directive on the Deployment of Alternative Fuel Infrastructure. They were all published between March and April 2020.

Our analysis according to Better Regulation principles (below) has identified generally consistent treatment, with a few concerns to be addressed in the upcoming Impact Assessment drafting.

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

IIA title	<u>Revision of the Industrial Emissions Directive</u>	<u>Ozone layer protection – revision of EU rules</u>	<u>Revision of the Directive 2014/94/EU on the Deployment of Alternative Fuel Infrastructure</u>
<i>Context and problem definition</i>	Consistently based on evaluation preliminary findings, although final evaluation report not yet published; more clarity is needed on the rationale for a new initiative and for inclusion of GHG abatement in the scope	Generally comprehensive, but section on problem definition includes premature references to solutions; link to climate neutrality not explained	Context generally balanced but includes one premature reference to expected impact; problem definition provides clear guidance but does not include references
<i>Objective(s) and policy options</i>	Objectives not identified; no presentation of potential policy options for each aspect	Appears to provide a clear and comprehensive overview of the objectives and options under consideration	Objectives and policy options are clearly related to problem definition and set at appropriate level of

			detail for this stage in the process
<i>Assessment of expected impacts</i>	Consistent with evaluation findings but premature projection of cost/benefit for potential new sectors; environmental impacts, the primary objective of the initiative, not given commensurate prominence	Preliminary assessment of impacts appears balanced and relevant, but expected positive impacts on public health not addressed	Primary impacts, being economic cost and environmental benefits, appear not to be given commensurate prominence
<i>Background data and sources</i>	Apparently comprehensive and well-referenced	Apparently comprehensive and well-referenced	Apparently comprehensive and well-referenced
<i>Timeline (respect of Better Regulation rules)</i>	Aligned	Aligned	Aligned