

Scrutiny of recent Inception Impact Assessments: waste shipments, sustainable alternative fuels for aviation and maritime sector

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The Impact Assessment Institute has scrutinised the European Commission Inception Impact Assessments, published in March 2020, on the revision of EU rules on waste shipments and on sustainable fuels for aviation ("ReFuelEU Aviation") and maritime sector ("FuelEU Maritime").

Our analysis according to Better Regulation principles (below) has identified good practice alongside some 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>Waste shipments - revision of EU rules</u>	<u>ReFuelEU Aviation - Sustainable Aviation Fuels</u>	<u>FuelEU Maritime - Green European Maritime Space</u>
<i>Context and problem definition</i>	Generally balanced, comprehensive and consistent with evaluation findings	Comprehensive overview of current situation and underlying problems, but technical assertions not backed up by references	Generally balanced and comprehensive description
<i>Objective(s) and policy options</i>	Appears to provide a full overview of the objectives and the options under consideration, although some additional clarity on the policy options would have been useful	Objectives are clear but boundary conditions, such as demand for air travel and need to maintain a competitive industry, require specification. Policy options appear to be clear and comprehensive.	Objectives consistent with problem definition, but policy options not clearly identified for this stage of the process. Paragraph on concurrent EU policy initiatives belongs to context.
<i>Assessment of expected impacts</i>	Detailed and comprehensive analysis, although not sufficiently differentiated in relation to policy options. There	Relevant analysis, but capacity for measures to overcome technological barriers identified is not sufficiently explained/substantiated. Potential negative impacts on cost and on	Preliminary assessment of impacts appears balanced and relevant

	is no reference to potential costs.	industry competitiveness not openly acknowledged.	
<i>Background data and sources</i>	Apparently comprehensive and well-referenced	Scope and sources of evidence base unclear	Apparently comprehensive and well-referenced
<i>Timeline (respect of Better Regulation rules)</i>	Aligned	Aligned	Aligned