

## Scrutiny of recent Inception Impact Assessments: packaging waste, fluorinated greenhouse gases, Trans-European Energy infrastructure, EU Green Bond Standard

*Publication date: August 3<sup>rd</sup>, 2020*

The Impact Assessment Institute has scrutinised four European Commission Inception Impact Assessments (IIAs), published between May and June 2020, on:

- Review of requirements for packaging and other measures to prevent packaging waste
- Review of rules on fluorinated greenhouse gases
- Revision of the Trans-European Energy Infrastructure's guidelines
- Establishment of an EU Green Bond Standard

Our analysis according to Better Regulation principles (below) has identified good practice alongside a number of concerns to be addressed in the upcoming Impact Assessment drafting. In certain cases, the combination of Evaluation Roadmap and Inception Impact Assessment creates challenges.

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

IIA title	<u>Review of the requirements for packaging and other measures to prevent packaging waste</u>	<u>Review of EU rules on fluorinated greenhouse gases</u>	<u>Revision of the guidelines for Trans-European Energy infrastructure</u>	<u>Establishment of an EU Green Bond Standard</u>
<i>Context and problem definition</i>	Full description, but more explicit links with waste hierarchy would have added clarity	Generally balanced and comprehensive, although explicit reference to evidence on the necessity for action in the context of the Green Deal would have been useful	Comprehensive analysis, but level of detail appears too high prior to evaluation	Generally balanced and comprehensive overview of current situation and underlying problems
<i>Objective(s) and policy options</i>	Relevant description of the objectives; specific policy options	Objectives not presented. Potential measures presented at level of detail	Appears to provide a full overview, appropriate for the evaluation stage.	Comprehensive overview of the objectives; policy

	under consideration not defined, only a list of potential measures	appropriate for the evaluation stage. Specific policy options should ideally be signalled to stakeholders with sufficient lead time before legislative adoption.	However, with maximum 8 months indicated until a legislative proposal, the absence of policy options is a major concern.	options not clearly identified
<i>Assessment of expected impacts</i>	Covers most issues objectively, but some economic impacts assumed without reference to evidence; employment impacts not substantiated	Analysis mentions an objective not previously introduced. Potentially substantial economic impacts from raising ambition level are not acknowledged. Social impacts are not given adequate attention.	Economic impacts on third countries not addressed; section on social impacts mostly contains economic impacts; environmental impacts, presented as primary objective of the initiative, are not given commensurate prominence	Preliminary assessment of impacts appears balanced and relevant, though broader economic impacts are not explored
<i>Background data and sources</i>	Sources of background data not fully identified	Apparently comprehensive, although some sources of background data are not clearly identified. Main stakeholders should also include civil society representatives.	Apparently comprehensive and well-referenced	Additional details on the only source cited would have been useful
<i>Alignment with Better Regulation guidelines (timeline and procedures)</i>	Aligned	Aligned in all aspects	Time to legislative proposal significantly less than guidelines; public consultation has insufficient duration (8 weeks) and is held in parallel with IIA feedback period	Public consultation held in parallel with IIA feedback period