

Initial Appraisal of a European Commission Impact Assessment

Streamlining measures for advancing the realisation of the Trans-European Transport Network

Impact assessment (SWD(2018)178, part 1 and 2, SWD(2018)179 (summary)) accompanying a Commission proposal for a regulation of the European Parliament and of the Council on streamlining measures for advancing the realisation of the Trans-European Transport Network (COM(2018)277)

This briefing seeks to provide an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the above-mentioned [proposal](#) submitted on 17 May 2018 and referred to the European Parliament's Committee on Transport and Tourism. By aiming to remove obstacles to investments in infrastructure projects in the transport sector, this proposal contributes to the [Investment Plan for Europe](#), which seeks to stimulate growth and investment in Europe. In view of this objective, it is considered important to boost transport infrastructure investments with significant EU added value, in particular through the development of the Trans-European Transport Network (TEN-T). The TEN-T network consists of the comprehensive network which ensures the accessibility and connectivity of all EU regions, and the core network which comprises strategically the most important parts of the comprehensive network. According to the TEN-T [Regulation](#) (EU) 1315/2013, the core network is due to be implemented by 2030 and the comprehensive network by 2050.¹ The required investments to complete the core network from 2021 to 2030 are estimated at €500 billion (EU-28). Approximately €1 500 billion would be needed for completion of the comprehensive network and for other transport investments, e.g. concerning decarbonisation and digitalisation (IA, pp. 2-3).² However, problems concerning delays and legal uncertainties have been identified, which impact on the effective completion of the TEN-T core network projects (IA, p. 7).³ The IA notes that there is a risk that the set deadline of 2030 for completion of the TEN-T core network will not be met. In 2014, the [Council](#) of Ministers invited the Commission to explore ways to simplify the procedures for such projects. In the 2015 [CBS action plan report](#), the European coordinators recommended the simplification of permitting rules as a means of accelerating the implementation of the TEN-T.⁴ Their 2018 [progress report](#) called for special procurement rules for cross-border projects and the setting of time limits for the permitting procedure. In 2017, the [Council](#) confirmed its strong commitment to completion of the TEN-T network. The European Parliament has emphasised the importance of the timely implementation of the TEN-T network in several resolutions.⁵

Problem definition

The problem definition provided in the IA is derived notably from the two outsourced studies, experience from the implementation of the TEN-T priority projects and stakeholder consultation.⁶ The IA has identified two **problems** impacting the effective delivery of the TEN-T core network projects, namely: 1) the 'delay in the implementation of the TEN-T core network' and 2) 'high level of uncertainty for projects promoters' (IA, pp. 7-8). The problems affect project promoters, public administrations and civil society, which is further explained in Annex 3 (IA, pp. 20-26). Complex regulatory and administrative arrangements are said to cause delays; moreover, unnecessary costs can arise due to unclear regulations and procedures and uncertainty for project promoters and potential private investors concerning the required time. Legal uncertainty can deter private

investment from TEN-T projects. The annual administrative costs incurred by authorities and project promoters are estimated at around €21 million (IA, pp. 7, 10-11; IA part 2, Annex 1 and Annex 2, pp. 4-19).

The five identified **problem drivers** are i) 'multiple stages and authorities involved in permitting procedures'; ii) 'absent or unenforced time limits'; iii) 'differing public procurement procedures for cross-border TEN-T projects'; iv) 'coordination challenges for the delivery of cross-border projects'; and v) 'perceived uncertainties related to State aid procedures' (IA, p. 8).

Regarding permitting procedures, the 2018 CBS progress report recommended that the process be simplified, as the delays are due to the many administrative phases. The IA explains that multiple environmental assessments and the level of decentralisation can increase the number of authorities in the process. It considers that efforts in some Member States to improve the procedures do not result in an adequate EU-wide approach and synchronised network implementation of the TEN-T. The IA highlights that cross-border projects can face special difficulties, given the differences between the Member States' permitting procedures. It points out that no Member State sets global time limits for the entire permitting procedures and most Member States do not sanction missed deadlines. The IA presents a table illustrating permit granting procedures in a number of Member States (IA, pp. 10-13).

As regards public procurement, issues such as the complex legal framework, absence of time limits for the award procedure, long review procedures to challenge the award decision and the lack of capacity of contracting authorities, can cause costs and delays. The objective of the recently transposed directives in the public procurement field ([2014/23/EU](#), [2014/24/EU](#) and [2014/25/EU](#)) has been to simplify public procurement procedures. While the new legislation may address some of the problems, it is felt that it would not, however, fully tackle the problems related to cross-border cooperation (IA, pp. 13-14). The IA notes, for example, that, increased coordination of procedures would be relevant in cross-border projects to make sure that participating parties proceed at the same speed (IA, pp. 15-16). In relation to public procurement, since 2017 the Commission has supported project promoters through a voluntary ex-ante mechanism (helpdesk, notification mechanism and information exchange). However, this assistance is not open to all TEN-T projects. According to the IA report, lateness and poor quality are the main reasons for delays and uncertainties concerning State aid notifications. The delays are linked to the lack of awareness of the need to notify State aid cases, while the low quality may be due to inexperience. The IA notes that the Commission has clarified State aid rules in recent years, for example with the Aviation Guidelines in 2014, the revised General Block Exemption Regulation in 2017 (port and airport infrastructure) and by providing information about public funding for infrastructure projects and EU State aid (Notice on the notion of aid and so-called 'analytical grids'). The 2018 CBS progress report advised the Commission to adopt a rapid appraisal procedure in cases where a project is in conformity with State aid rules, which would enhance legal certainty and predictability of the investment (IA, pp. 17-18).

The baseline scenario is based on the updated EU reference scenario 2016, taking into account the assumed delays in the implementation of the core TEN-T network investments due to the permitting procedures (IA, p. 23). The delays and legal uncertainties would continue within the existing legislative framework, hindering the effective delivery of the TEN-T projects (IA, p. 18). The IA notes, basing itself on the findings of the previous priority project reports (2012), that only half of the investments would take place as scheduled, 25 % would be delayed by one year, 15 % by two years and 10 % by three years. It estimates an average delay of two years due to permitting procedures (IA, p. 23). The 2030 deadline set for the implementation of the TEN-T core network is not likely to be met. The IA estimates the administrative costs for the authorities at €185 million in 2018-2030 (present value) and at €937 million in 2018-2030 (present value) for project promoters. The estimated total administrative costs are €1 122 million in 2018-2030 (present value). The IA also considers that transport infrastructure projects would remain uninteresting for private investors (IA, pp. 18-19, 24).

The IA provides a comprehensive and convincing problem analysis, which is illustrated in a problem tree showing the links between the problems, problem drivers and consequences. However, State aid issues could have been explained in a more detailed way.

Objectives of the initiative

The **general objective** of the initiative is 'addressing the delays and the high level of uncertainty which impact the effective delivery of the TEN-T core network projects'. The IA notes also that 'in particular, this initiative aims at accelerating the benefits of the implementation of a fully interoperable and interconnected transport network linking the main economic centres and all the Member States' (IA, p. 21). Two **specific objectives** have been defined, which are: (SO1) 'minimising the risk of delays faced by individual TEN-T projects' and (SO2) 'increasing legal certainty for project promoters thus attracting more private investors to transport infrastructure' (IA, pp. 21-22). The SO1 would address the problem drivers (ii)-(iv) and the SO2 the problem drivers (i)-(iii) and (v). The **operational objectives** are presented after the selection of the preferred option in the monitoring and evaluation section, as required under the [Better Regulation Guidelines](#).

The objectives are linked to the identified problems. According to the Better Regulation toolbox, the defined objectives should be specific, measurable, achievable, relevant and time-bound (S.M.A.R.T. criteria, [Tool #16](#)). It can be noted that the general and specific objectives are rather similar, and that they could have been formulated in a more specific and measurable manner. As regards the time-bound criteria, deadlines have been defined for the TEN-T networks. It can also be noted that in another part of the IA report, the formulation of the general objective differs from the section on objectives (IA, Table 17, p. 47). As such the text would have benefited from further clarification of the general objective. It would have been useful to have an explanation as to why SO1 does not address also problem driver 1. There is also some inconsistency in the text as problem driver 5 is referred to as 'reluctance of private investors to TEN-T core network infrastructure projects', which is one of the consequences (IA, p. 22; problem tree, p. 8).

Range of options considered

The IA describes the process for identifying, retaining and discarding the policy measures and developing the policy option packages. Available policy measures are presented in Table 2 and the retained policy measures in Table 3 (IA, pp. 25-28), with an indication of whether they are mandatory (M) or voluntary (V). The IA provides three policy option packages (the third option includes two sub-options) in addition to the baseline, which are partly cumulative.

Baseline (no further EU action).

Policy option 1 (PO1) (Minimal change to the existing instruments and development of soft law as well as accompanying measures):

Option PO1 includes guidelines for the permit granting procedures, clarification of the existing legislation and targeted use of existing mechanisms and targeted technical assistance (M; problem driver 1). It would also recommend indicative time limits for overall permitting procedures (V; problem driver 2). As regards public procurement procedures, this option includes guidelines and a clarification of the existing legislation and a targeted use of existing mechanisms (e.g. planned public procurement helpdesk, [JASPERS](#) or [EIAH](#) support) (M; problem driver 3). It provides a reinforced mandate of the TEN-T European coordinators to facilitate the coordination of national permit granting bodies (M; problem driver 4). In addition, in relation to State aid control procedures, technical assistance measures would be targeted at project promoters and national authorities (M; problem driver 5) (IA, pp. 28-32).

Policy option 2 (PO2) (Limited binding action to be decentralised and implemented at national level) (preferred option): Under this option, a one-stop-shop (OSS) for TEN-T core network projects would be established at national level and an integration of different administrative procedures at national level would be required (M; problem driver 1). The mandatory

measures referred to in PO1, concerning guidelines for the permit granting procedures, clarification of the existing legislation and targeted use of existing mechanisms and targeted technical assistance, would be voluntary in option 2 (V; driver 1). Option PO2 comprises the obligation to introduce time limits for overall permitting procedures and legal appeals (M; problem driver 2). In public procurement, there would be a requirement to opt for a single legal framework for public procurement of cross-border projects and to limit the time for appeals in the procedures concerning TEN-T projects (M; problem driver 3). In addition, this option consists of measures concerning guidelines for TEN-T project promoters and better use of existing instruments (V; problem driver 3). Like PO1, this option also comprises the reinforced mandate of the TEN-T European coordinators to facilitate the coordination (M; problem driver 4). Option PO2 also includes a priority treatment of State aid notifications for TEN-T core network projects (M; problem driver 5). Targeted technical assistance measures in relation to State aid procedures would be a voluntary measure, whereas these are mandatory in PO1 (IA, pp. 29-32).

Policy option 3 (PO3) (An EU framework for authorisation of the TEN-T core network projects):

Under this option, there would be an EU framework for the authorisation of the TEN-T core network projects and a specific set of rules for public procurement of cross-border projects. PO3 has two sub-options, based on different application levels. Under **PO3a**, the measures concerning the EU authorisation procedure with time limits are defined at the EU level, but are applied at the national level following the national administrative procedural rules. Under **PO3b**, on the other hand, the measures concerning the EU authorisation procedure which have time limits are applied at EU level by the Commission or EU agencies (IA, pp. 30-32). Both options **3a-b** include the measures of option PO2, except the OSS and integration of administrative procedures. The targeted technical assistance measures in relation to the problem drivers (i) and (v) are voluntary in PO2 while they are mandatory in PO3a-b (IA, pp. 30-32).

The range of options appears to be sufficiently broad, as required in the Better Regulation Guidelines. The options have a clear link to the problem definition and problem drivers. The identification of policy measures has been supported by the stakeholder consultation, expert meetings and research (IA, p. 24). As regards the description of the options, there are some inconsistencies in the text (IA, pp. 30-32). Under PO3a-b, the IA notes in Table 4 that these options include specific measures 'in addition to the measures in policy option 2'; however, in options 3a-b, there is no OSS and integration of administrative procedures. Furthermore, some measures are voluntary in PO2, but mandatory in options 3a-b, as explained above (IA, pp. 30-32). The IA provides a summary of stakeholder views in the section comparing the options (IA, pp. 52-53). Information on the respondents could have been more specific, as the references to the respondents are rather general (e.g. 'industrial interest groups', 'some national governments'). The preferred option is option 2.

Scope of the impact assessment

The IA has assessed the economic, social, environmental and legal impacts of the policy options. In this assessment, the IA stresses that only the currently planned TEN-T core network projects have been taken into account (IA, p. 32). The assessment is qualitative and quantitative. The options have been compared against the criteria of effectiveness, efficiency and coherence. Furthermore, the aspects of proportionality and subsidiarity have been considered and a sensitivity analysis has been carried out for the baseline scenario and effectiveness rates (IA, pp. 41-53). The IA considers that all options would facilitate reduced delays in project implementation, which would have economic impacts such as direct effects on investments, costs for transport users (e.g. time savings, lower transport costs, increased reliability and productivity of the sector) and economic growth (e.g. increased productivity, technological spill-overs). The options are expected to lead to savings for promoters (simplified procedures) and increased costs for authorities (due to the establishment of the one-stop-shop). The options would contribute to the aim of the TEN-T policy, which is to enhance sustainable transport modes and encourage a shift from road to more sustainable transport modes (IA, pp. 32-36). In the environmental analysis, impacts on CO₂ emissions, air quality

and noise emissions are considered. The faster modal shift is expected to lower CO₂ and noise emissions and air pollutants (IA, pp. 36-38). Social impacts are assessed in terms of employment, public consultation (changed procedures), EU cohesion, health (reduction of accidents), life quality, local benefits and social inclusion (IA, pp. 38-43). The IA estimates that PO2 and PO3 are more effective in achieving the objectives and more efficient in terms of costs and benefits than PO1. PO3 is considered to generate the best impacts from the point of view of quantitative assessment, direct impacts and larger economic impacts. On the other hand, the net impact is the most positive in PO2. As regards coherence with other EU policies, PO1 and PO2 are considered to be more coherent than PO3 (e.g. objectives of public participation and access to justice). In addition, the IA estimates that PO3a-b may raise concerns from the point of view of subsidiarity and proportionality because it would replace national permitting mechanisms by an EU level authorisation. PO3b would change the current system even more as it would shift the application to the EU level. The IA selects PO2 as the preferred option as it is considered to provide a balanced, effective, efficient and coherent framework. The IA points out that PO2 takes into account the positive experiences from the Trans-European Energy Network (TEN-E) rules (IA, pp. 45-54).⁷

Subsidiarity / proportionality

The Commission proposal is based on Articles 170 and 171(2) of the Treaty on the Functioning of the European Union (TFEU). The Trans-European Transport Networks are transnational by definition, and the completion of the TEN-T requires coordination and synchronisation measures at the EU level. The IA notes that the objective of addressing the delays and uncertainty for project promoters can be better achieved through a clear EU framework (IA, pp. 19-20). It considers that the preferred option PO2 would be proportional and would not go beyond what is necessary to achieve the objectives. It would leave scope for Member States to decide their administrative set-ups (IA, p. 52). The subsidiarity check deadline for the national parliaments is 3 September 2018. At the time of writing, the Swedish [Riksdag](#) has submitted a reasoned opinion. It objects to the introduction of an integrated permit granting procedure and considers that the objective of the initiative would be better achieved by procedures which take into account the national, regional and local conditions.

Budgetary or public finance implications

Under the preferred option, the creation of the one-stop-shop at national level is expected to entail administrative costs of €13 million for national budgets for the years 2018-2030 as regards permitting authorities. The costs are due to decrease over time as they relate in particular to compliance. For the promoters, the preferred option would reduce the costs by 18 % (€166 million). The combined impact of the preferred option would decrease the total administrative burden by 14 % (€153 million). In addition, an increase in GDP of 1.6 % is expected compared to the baseline (IA, pp. 34-35; IA part 2, Annex 3, pp. 25-26).

SME test / Competitiveness

The IA notes that TEN-T core network projects usually involve large civil contractors. This is because this type of projects requires specific experience and capacity, which many SMEs do not have. On this basis, the IA considers that the options would not have direct impacts on SMEs. The IA points out, however, that the initiative could have positive spill-over effects on SMEs in the construction market, where SMEs are often sub-contractors (IA, p. 36). Some further discussion on the potential impacts on SMEs, for example participation in procurement and consultation processes, would have been welcome. It would have benefited the analysis also if SMEs' views on this initiative had been specifically presented.

Simplification and other regulatory implications

The initiative seeks to streamline the procedures concerning the TEN-T projects and reduce administrative burden. The preferred option would be coherent with other EU policies, such as on public procurement rules or environment protection (IA, pp. 34-35, 51).

Quality of data, research and analysis

Overall, the data behind the analysis is sound. The IA has been supported by two outsourced studies, experience from the implementation of the TEN-T priority projects, stakeholder consultation results, CBS reports and literature (see endnote 6). The IA provides a qualitative and quantitative assessment, and a sensitivity analysis has been carried out. Experience from TEN-E (trans-European energy infrastructure) has been taken into account (reduced timeframes for authorising projects and a single authorising authority for all permit granting processes) (IA, p. 9). The methodology, assumptions and calculations are transparently explained in Annex 4; Annex 3 provides information on the costs and benefits of the preferred option. The description of options could have been clarified further, as the information is to some extent scattered. Some inconsistencies have been found in the report, for example, in the formulation of the general objective (IA, pp. 21, 47), problem driver 5 (IA, pp. 8, 22) or the description of the options (IA, Table 4 and Table 5, pp. 30-32).

Stakeholder consultation

The IA provides a synopsis report on the stakeholder consultation, as required by the Better Regulation Guidelines (IA part 2, Annex 2, pp. 6-19). It also presents a summary of stakeholder views in the section comparing the options (IA, pp. 52-53). The Commission conducted an open public consultation (OPC) in order to collect opinions on the problems and proposed solutions. It does not indicate the dates of the OPC, so it is not known whether the 12 week period required by the Better Regulation Guidelines was fulfilled. In the OPC, 99 responses were received (20 individuals, 79 organisations). Of the responses, 20 % were regional, local or municipal authorities, 19 % project promoters, 20 % industrial, business or sectorial associations and 16 % national governments. In the inception impact assessment, (published in June 2017) the feedback mechanism resulted in three responses (one individual, one national agency, one transport association). In addition, the Commission organised three workshops with stakeholders between June 2017 and October 2017 focusing in particular on the aspects of public procurement, cross-border projects and permitting procedures. The Commission also carried out some interviews with selected national administrations (France, Germany, the Netherlands, Portugal and Italy) between December 2017 and January 2018. The IA explains that, as part of an outsourced study, another open public consultation was conducted between 17 June 2016 and 5 September 2016, meeting the 12 week requirement. The IA reports 88 responses to that questionnaire (21 individuals, 67 organisations). It presents a table showing the breakdown of responses by organisation type (the table refers to 66 organisations rather than 67) (IA part 2, Annex 1, pp. 10-11). The Commission organised further working sessions with stakeholders between January and December 2016. In the framework of the outsourced study, competent authorities and project promoters were interviewed as part of the case studies (ten selected countries) (IA part 2, Annex 1, pp. 10-12).

The integration of procedures under a single entity at national level (one-stop-shop) was supported by project promoters, individuals and industrial interest groups. Reserved opinions were expressed by 'a significant portion' of national and regional governments, whereas in other parts the IA mentions that 'some national governments' have reservations (IA, p. 52; IA part 2, Annex 1, p. 16). The project promoters, individuals and industrial groups supported the establishment of time limits for the permit granting process, whereas the authorities and 'some national governments' were critical because they considered that such limits could risk creating delays for small projects (IA, p. 52; IA part 2, Annex 1, pp. 17). The project promoters and industrial groups found a common set of rules at EU level applied to cross-border projects to be the most effective solution to improve public procurement issues. For national authorities this instrument would be more effective when applied to cross-border projects benefiting from EU funding. According to the IA, respondents agreed that environmental assessments, State aid control and funding decisions could be dealt with under a single procedure. There is 'reluctance among some' national governments and regional and local authorities as regards the definition and handling of procedures at EU level, as they consider that only national authorities can verify individual approval requirements and they also see a risk of

duplications (IA part 2, Annex 1, pp. 17-19). The information about the respondents could have been more specific, both in the synopsis and in the options section, as the references are quite general (e.g. 'national authorities', 'industrial interest groups', 'some national governments').

Monitoring and evaluation

There is no explanation as to how and when the initiative will be evaluated. Instead, the IA simply refers to the monitoring method set out in the TEN-T Regulation and reporting by the executive agency INEA. It also says that 'the overall evaluation should take into consideration the general pace of the implementation of TEN-T'. In this section, as the preferred option has been selected, the operational objectives are presented, namely: i) 'accelerate the pace of the implementation of the TEN-T'; ii) 'increase the effectiveness of EU funding for the delivery of the TEN-T core network'; and iii) 'increased use of private and alternative financing in the TEN-T infrastructure projects'. The IA provides indicators for the specific objectives and operational objectives. Data sources are not mentioned (IA, pp. 54-55).

Commission Regulatory Scrutiny Board

The Regulatory Scrutiny Board (RSB) issued a positive [opinion](#) with reservations on a draft version of the IA report on 9 March 2018. The main remarks of the RSB were that the IA did not provide sufficient evidence on how permit procedures and public procurement impact delays in construction; that it should have included information about experience of TEN-E and EFSI (European Fund for Strategic Investments) and also about the measures which Member States have taken to streamline the processes; that stakeholders' views on the options should have been included; and that the IA lacks a sensitivity analysis and needs further information on the assumptions of the calculations. The final version of the IA report explains, as required by the Better Regulation Guidelines, how the remarks of the RSB have been followed up (IA, Annex 1 pp. 1-4) and it would appear that they have largely been taken into account. However, stakeholders' views could have been more specifically explained under each option, impacts on SMEs could have been discussed more and State aid issues could have been described in a more detailed manner in the problem definition.

Coherence between the Commission's legislative proposal and IA

The legislative proposal appears to largely follow the recommendation of the IA.

Conclusions

Overall, the IA provides a comprehensive problem analysis, which is supported by two outsourced studies, experience from the implementation of the TEN-T priority projects, stakeholder consultation results, reports and literature. The objectives and the options have a clear link to the problem definition. However, in the problem description, State aid issues could have been explained in more depth, and the objectives could have been further specified. The IA could also have devoted more discussion to this initiative's impact on SMEs, for example their participation in procurement. More information on the respondents in the consultation process would also have been welcome as the indications of views are quite general. Furthermore, the IA does not provide any information on the duration of the first open public consultation.

ENDNOTES

¹ See M. Remáč, [Trans-European Transport Network \(TEN-T\)](#), implementation appraisal, EPRS, April 2018; M. Pape, [The trans-European transport network - state of play in 2016](#), EPRS, October 2016.

² European Commission, [Delivering TEN-T: Facts and Figures](#), September 2017.

³ See the [inception impact assessment](#) on streamlining the implementation of the Trans-European Transport Network.

⁴ European TEN-T coordinators, nominated by the European Commission, draw up, support and monitor implementation of corridor work plans, make recommendations and report on progress. 'CBS'= H. Christophersen (former European Commission Vice-President), K. Bodewig (European Coordinator), C. Secchi (European Coordinator).

⁵ See also, for example, European Parliament [resolution of 19 January 2017](#) on logistics in the EU and multimodal transport in the new TEN-T corridors; [resolution of 14 December 2017](#) on a European strategy for low-emission mobility; [resolution of 25 October 2016](#) on improving the connection and accessibility of the transport infrastructure in Central and Eastern Europe.

⁶ European Commission, [TEN-T, Implementation of the Priority Projects](#), November 2012; Milieu et al., [Study on permitting and facilitating the preparation of TEN-T core network projects](#), December 2016; Panteia et al., PwC, M-FIVE Impact Assessment support study, 2018 (link is not provided in the IA; not published yet).

⁷ [Regulation \(EU\) No 347/2013](#) of the European Parliament and of the Council of 17 April 2013 on guidelines for trans-European energy infrastructure and repealing Decision No 1364/2006/EC and amending Regulations (EC) No 713/2009, (EC) No 714/2009 and (EC) No 715/2009. The provisions of the TEN-E Regulation aim to reduce the timeframes for authorisation of TEN-E projects and include the concept of a single authorising authority for permitting processes (IA, p. 9).

This briefing, prepared for the Committee on Transport and Tourism, analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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