BRIEFING

Initial Appraisal of a European Commission Impact Assessment

European Maritime Single Window environment

Impact assessment (SWD(2018) 181 final, SWD(2018) 182 (summary)) accompanying a Commission proposal for a regulation of the European Parliament and of the Council establishing a European Maritime Single Window environment and repealing Directive 2010/65/EU

This briefing provides 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 Parliament's Committee on Transport and Tourism (TRAN). The proposal is part of the third 'Europe on the Move' package, which seeks to deliver the 2017 industrial policy strategy[1] and complete the process of the modernisation of mobility, including its decarbonisation, and the establishment of a digital environment for exchange of information.[2]

According to the Commission, digitalisation of transport can have a positive impact on various areas, including transport management, exchange of information and cost-efficiency. In maritime transport, digitalisation can have a direct impact on the reporting obligations for ships calling at EU ports. Nowadays, maritime transport operators face a wide range of legal reporting requirements, declarations and formalities for ships arriving in and/or departing from Member State ports ('port calls'). These requirements include, for example, entry summary declarations, information and data relating to border controls, environmental controls, safety/security and traffic management etc. Over two million port calls are made annually in the EU, equating to approximately 4.6 million hours of reporting (IA, p. 12). The current legal framework is represented by the Reporting Formalities Directive 2010/65/EU ('the RFD'),[3] which defines reporting requirements for maritime operators. The annex to the RFD includes a list of mandatory reporting formalities resulting from EU law for ships calling at ports, international instruments (e.g. the International Maritime Organization Convention on Facilitation of International Maritime Traffic Convention) and relevant national legislation. These formalities have to be transmitted electronically via a single entry point for reporting formalities at national level – the 'national single window' interface (NSW). In this regard, the ex-post evaluation covering the RFD,[4] conducted as a part of the 2016-2017 fitness check on EU maritime transport policy, analysed the state of implementation of the directive and discovered *inter alia* 'the lack of timely and detailed binding technical specifications on the implementation of national single windows' (Ex-post evaluation, p. 4). It also found that the directive is 'inadequately effective and efficient, in spite of the objectives remaining highly relevant and valid' (IA, p. 11). Thus, despite establishing the reporting formalities in the RFD, there are existing challenges that limit its harmonised application among the Member States and its harmonisation effect.[5] In May 2018, the Commission submitted the present legislative proposal which seeks to address the non-harmonised reporting environment for ships while taking into account the latest technological changes. The proposal was part of the Commission's annual work programme 2018 (Annex 2: REFIT initiatives).

Problem definition

The general problem of the existing regulatory framework as identified in the IA is **'an inefficient port call reporting environment for maritime transport operators**' (IA, p. 10). The IA points to a plethora of reporting obligations and formalities for ships during a port call, whether in international traffic, intra-EU traffic or national traffic, and a lack of overall EU-level harmonisation, with different formats, reporting procedures and scopes among individual Member States. It considers that the 'non-harmonised reporting environment makes reporting a very burdensome and time-consuming task for shipping operators' (IA, p. 12). It identifies four problem drivers (IA, pp. 13-20):

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(1) Diverse ship reporting formats, interfaces and procedures used throughout the EU

Because of various limitations of the RFD (e.g. no mechanisms to continuously develop and improve harmonisation provisions), and the absence of binding common standards, reporting interfaces are 'technically different for practically each port call' (IA, p. 14). Required data sets and reporting formats are not aligned between Member States. The lack of harmonisation is especially burdensome for vessels calling at several EU ports. Furthermore, there are different channels or interfaces that maritime operators need to use. In parallel to national single windows, there often exist additional national reporting entry points limiting the harmonisation of reporting.

(2) Diverse ship reporting requirements throughout the EU

The RFD reporting rules are not overarching as they only cover some of the formalities set in EU legislation and international maritime agreements. The RFD establishes mandatory formalities which must be provided for administrative and procedural purposes when calling at a port. These include at least 230 data elements. In addition, ships need to provide further information belonging to non-harmonised national reporting requirements (200 data elements) and cargo-related requirements required by custom authorities and maritime transport authorities but not channelled via national single windows (approximately 150 data elements). Furthermore, various (approximately 100) ship certificates should be kept on-board in paper form (IA, p. 16).

(3) An unclear legal framework for sharing and using reporting information

Due to a lack of data-sharing between competent national authorities, duplicate reporting often takes place when calling at a port. 'An inefficient data sharing environment where reported data is not sufficiently channelled to all relevant data recipients' can be found in many Member States and ports according to the IA (IA, p. 17). Furthermore, an exchange of data between different ports does not often happen. According to the IA, the re-use and efficient data sharing is still hampered by 'unclear or missing specifications on data definitions and use/re-use' (IA, p. 19).

(4) An inadequate implementation of current EU legislation

Slow implementation of the RFD by Member States contributes to the complexity of the reporting environment. The IA notes that operational national single windows are still under implementation in 8 out of 23 maritime Member States (IA, p. 19). This can create differences between the reporting environments among Member States. Even with implementation of national single windows the necessary national procedures or rules are not always in place. The IA also mentions a lack of sufficient incentives in the RFD to establish national single windows in a harmonised manner.

In general, the IA provides a satisfactory description and assessment of all four problem drivers, pointing to various administrative burdens faced by maritime operators. It refers to stakeholder opinions, as well as various reports and the results of the RFD evaluation.

Objectives of the initiative

The initiative's **general objective**, as defined by the IA, is to 'contribute to the smooth functioning of the single market and facilitate trade and transport by addressing the currently cumbersome and diverse reporting procedures for ships calling EU ports' (IA, p. 23).

The **specific objectives** are to (1) harmonise reporting procedures, interfaces and data formats; (2) reduce administrative burden in ship reporting by providing a single entry point; and (3) increase efficiency of digital reporting by facilitating data sharing/reuse for the application of the 'reporting only once' principle. The IA does not explicitly discuss **operational objectives**. These are only mentioned in an untitled table (IA, pp. 66-67) that considers (1) establishing a technical data set with harmonised data formats; (2) developing and implementing common harmonised software for the NSW; (3) reducing data elements requested outside the harmonised European Maritime Single Window environment (EMSWe) for maritime transport; and (4) reduce static data elements reported more than once.

The specific objectives align with the problem drivers and the general objective aligns with the problem consequences identified. Nevertheless, their presentation is very short and could have been more

explicit, in particular regarding the distinction between the general and specific objectives and the level of policy action required to achieve the latter, as advised in the Better Regulation (BR) guidelines. Also, according to these guidelines, specific objectives should be specific, measurable, achievable, relevant and time-bound, to allow for effective monitoring and evaluation of their achievement. Not all of these criteria appear to be fulfilled in this case. This is particularly relevant as the main text of the IA does not clearly present operational objectives, also required by the BR guidelines and toolbox (Tool #16). Furthermore, specific objective 2 does not seem to be phrased in a sufficiently specific and clear manner as the RFD creates NSW that should function as single entry points. Despite these weaknesses, the objectives are in line with the results of the evaluation and the Commission's intention to improve the existing system of reporting formalities for ships.

Range of policy options considered

The IA discusses policy options as well as policy measures. Policy measures are clustered around individual problem drivers and, when combined, they create incremental policy options. Twelve policy measures address harmonisation requirements and define the scope of what shipping operators can report. A very short description of each of these policy measures and their actions is provided (IA, pp. 30-33). Based on the combination of individual policy measures, the IA introduces six individual policy options to tackle the general problem and its drivers. While policy options A2, B2 and C2 limit the policy intervention to the existing mandatory RFD reporting formalities, policy options A1, B1 and C1 provide an all-inclusive, comprehensive approach towards reporting formalities. The IA describes a baseline option assuming that Member States continue to apply the current EU legislation (RFD), while predicting the likely developments if the reporting formalities system remains as it is. Two discarded policy options (D1 and D2 – harmonised reporting via a mandatory port community system) are also briefly discussed (IA, p. 46).

Options A1, B1 and C1 (comprehensive scope options):

Option A1: Introduction of harmonised reporting gateways as front-ends to the NSWs via binding technical specifications

Option A1 seeks to introduce EU-level binding requirements for harmonising the reporting gateways (front-end interfaces) of existing NSWs in Member States, while giving Member States full and exclusive responsibility for their implementation, operation and update. This option intends to cover **the comprehensive set of all reporting requirements for vessels performing a port call** including 'all entry/exit formalities **and** notifications required from the carrier by customs and all national level data elements' (IA, p. 35). This should create a decentralised system of very similar NSW front ends in all Member States, which would allow shipping operators to adjust their reporting systems only once, so that they could report in any EU port in the same way. This option requires the development of technical specifications for data and interfaces. It also require connection between Member States' NSWs and all necessary entities' back-end data recipients. This data will be split so that recipients receive only specific data elements. The data to be provided must be defined for the EMSWe, while no other additional data should be requested. The aim of this option is to enable the application of the reporting-only-once principle (IA, pp. 32-39).

Option B1: Introduction of harmonised reporting gateways as front-ends to the NSWs via a common IT solution for harmonised interface and formats

Option B1 seeks to develop an EU-level, mandatory, common reporting gateway IT solution that would be delivered and installed in all Member States' NSWs. This new harmonised reporting gateway should be plugged into the existing systems and replace the old interfaces. This component should then enable submission of data in a common EU format to different NSWs. The common IT solution would be developed at EU level, as 'open-source software' that would allow national authorities easy modifications of the back-end of the reporting gateway. The NSWs would perform the same roles while requiring minimum adaptations. This option would lead to **a decentralised reporting system of identical**

reporting gateways in all Member States. The responsibility for this option would be jointly shared by the EU and Member States (IA, pp. 40-42).

Option C1: Introduction of a central EU-level reporting gateway

Option C1 introduces a single centralised European reporting gateway operated by an (unspecified) EU-level entity. The option introduces only one reporting entry point for all port calls throughout the EU, including necessary two-way information exchanges between data providers and connected entities. Such a gateway would channel incoming notifications directly to other EU-level systems for customs entry summary declarations and other data via NSWs to national level data recipients. NSWs would remain in place with adaptations, serving as a router between the centralised gateway and national level data recipients, and could be still used as an option for operators in domestic traffic. This option foresees sole responsibility for the EU (IA, pp. 42-43).

Options A2, B2 and C2 (limited scope options):

Options A2, B2 and C2 are identical to options A1, B1 and C1; however, their scope is limited only to the currently mandatory RFD reporting formalities and the national legal requirements. They do not seek to cover the customs IT systems (and their requirements) which are intend to keep working in parallel (IA, pp. 39-40, pp. 41-42 and pp. 42-43).

The table below presents the **retained policy options.** Options A1-A2, B1-B2 and C1-C2 have an identical character but different (comprehensive or limited) scope.

	Option A1-A2	Option B1-B2	Option C1-C2
Harmonisation	Via legally binding common technical specifications for Member States	Via identical front-end components for the harmonised reporting gateway	Via a centralised reporting gateway at EU-level
Member States' role	Develop the new front-end solution based on the EU specifications and adapt NSWs	Plug in the EU provided front-end component to their NSWs	Adapt NSWs to be connected with the centralised gateway layer
EU's role	Deliver the technical specifications	Develop and deliver the common IT solution to be plugged in NSWs	Develop, establish and operate the central reporting gateway
National Single Windows	Remain as the reporting entry points, adapted to the harmonised format	Remain as the reporting entry points, compatible with the harmonised front-end IT solution	Include a new routing function and may remain capable to receive reporting directly from ships
EU-level help desk	Training/support	Support with instalment and the functioning of the IT solution	Support with connections between NSWs and the central gateway

Source: Table: Overview of main differences between the harmonisation solutions (IA, pp. 44-45), author.

The overall presentation of the options' content is clear, though in most of the cases, with the exception of Option A1, it is rather superficial. Only Option A1 clearly discusses issues like the introduction of a helpdesk function, the development of a complaint/feedback mechanism, governance mechanism, and an e-certificate initiative. The other options in this regard only refer back to Option A1. This might lead to the perception that Option A1 is much more complicated in comparison to the other options. Options A2, B2 and C2 are discussed only marginally since *de facto* they are sub-options of options A1, B1 and C1. All the options are rather clear and they are supported by simplified figures depicting the intended functioning of the individual options to allow for better understanding. The IA also provides brief descriptions of the advantages and disadvantages of each option. A table providing an overview of the

main differences between the harmonisation solutions is also included (IA, pp. 44-45). Nonetheless, the clarity and transparency of the document would have been further improved if the problem tree illustrating the problem, drivers and objectives had been more sophisticated.[6]

The preferred option in the IA is **policy option B1**.

Scope of the impact assessment

The IA follows a structured approach and assesses the effectiveness, cost-efficiency, coherence and proportionality of the individual policy options. The most effective policy option, according to the IA, is Option C1, closely followed by Option B1. Option C1 best meets the proposal's general and specific objectives. Regarding efficiency, Option B1 was assessed as the option with the highest cost-benefit ratio, while being the second cheapest option (second only to Option B2). The IA found that all proposed options were in coherence with other EU policy objectives.[7] All policy options, according to the IA, are designed so as to avoid imposing any disproportionate burdens whether on SMEs or Member States. The IA also explains that although the preferred Option B1 is not 'the first choice of any stakeholder group', it presents 'a realistic compromise' between diverging views of stakeholder groups and those of Member States, with the possibility of being supported by all main stakeholder groups (IA, p. 62). Although this decision is supported by an additional short analysis, the IA could have been more specific and thorough in explaining its reasons and clarifying its choice. In terms of social impacts, the IA notes a decrease in cumbersome and repetitive tasks for shipping operators, and benefits on safety levels, though it does not monetise their value. However, due to simplification of reporting procedures, services of shipping agents might no longer be needed in the current format (IA, pp. 55-56). In terms of environmental impacts, the IA also foresees a shift away from road to waterborne transport (0.3 % by 2030), leading to a 0.1 % decrease in CO_2 emissions by 2030 (IA, pp. 56-57).

Subsidiarity / proportionality

The legal basis for the proposal is Article 100 (2) TFEU. The IA refers to subsidiarity and the necessity for EU action in a dedicated section. It points to fragmented national legislation and often incompatible transport systems in Member States which prevent the efficient treatment of the existing problems. The IA claims that the proposed action can be better achieved at Union level than at national level (IA, p. 21). Several national parliaments have scrutinised the proposal, but at the time of writing none has issued a reasoned opinion on subsidiarity or proportionality grounds. The deadline for submission was 3 September 2018. In the Commission's view, the choice of a regulation as the policy instrument is adequate, as this would allow the achievement of the objectives of the proposal (IA, p. 62). The explanatory memorandum of the proposal underlines that a regulation is a more appropriate instrument for ensuring harmonisation (explanatory memorandum, p. 3). The IA does not explore the issue of proportionality in more detail.

Budgetary or public finance implications

Although all proposed options should lead to a reduced administrative burden – shipping operators and industry are expected to spend less time on reporting tasks – their differing scope has somewhat different budgetary implications. The IA compares the time savings for shipping operators in a harmonised reporting environment under each policy option against the baseline scenario. According to the IA, three of the options (A1, B1 and C1) should lead in 2020-2030 to cost savings of 22-25 million staff hours, amounting to €625-720 million,[8] while the other three options (A2, B2 and C2) would only lead to cost savings of 7-8 million staff hours, amounting to €215-245 million (IA, p. 50). The main costs for the Commission and for Member States are connected with the development and adaptation of IT solutions and IT infrastructure. The budgetary implications of the preferred option (expected costs of IT services and IT system development) for the Commission between 2020 and 2030 correspond to €13.5 million and the combined costs for EU28[9] for the same period are €15.8 million (IA, Table 4, p. 54). The costs and benefits of the preferred option are also discussed in Annex 3. The annex quantifies one-off direct costs of €340 000 on average per Member State, and recurrent costs (between 2020 and 2030) of €350 000 per Member State (IA, p. 87); the frequency of the recurrent costs is not clearly specified, however. There is a

discrepancy with the IA's executive summary, which estimates average costs at €1.15 million per Member State.

SME test / Competitiveness

The IA points to high benefits of the proposal for SMEs. These benefits include mostly reduced administrative burden and more efficient interaction with authorities (IA, p. 54). The IA mentions benefits for SMEs stemming from clarified data re-use principles and data rules. The IA explains, however, that there was insufficient data to 'calculate a separate benefit quota for SMEs'. Regarding costs for SMEs, the IA claims that the adaptation costs would be 'negligible or in size of the normal regular updates' under the RFD (IA, p. 55). No additional costs for SMEs are foreseen. The IA's summary also mentions that 'the reduced administrative burden and simplified reporting will release staff resources, bringing added value especially to SMEs' (IA executive summary, p. 1).

Simplification and other regulatory implications

According to the IA, the harmonised reporting gateways should ensure 'a simplified and harmonised front-end of reporting to reduce shipping operators' burden' (IA, p. 29). Simplified reporting would *inter alia* lead to improved competitiveness. Regarding the preferred option, the IA notes that it offers 'significant simplification and improved efficiency by reducing the administrative burden for shipping operators' (IA, p. 64). This option seeks to harmonise front-end reporting gateways, to provide a single reporting entry point and to make re-use of data more efficient, thus enabling reporting only once. Additional impacts that the IA links with the proposal include an improvement of maritime transport and related multimodal and logistic services, better information exchanges and information flows, overall efficiency gains enabling new quality services, a secure digital economy and a continued evolution of innovative solutions helping the digital reporting environment (IA, pp. 56-57). The proposal complements the Commission's initiative on electronic freight transport information.[10] These two proposals seek to exploit synergies regarding data interoperability aspects.

Quality of data, research and analysis

The IA relies mostly on the ex-post evaluation of the RFD, which allows it to identify the main implementation challenges. In addition, when assessing the baseline scenario, the IA relies on the Commission's 'EU Reference Scenario 2016: Energy, transport and GHG emissions – Trends to 2050'.[11] Furthermore, it uses a combination of various analytical models described in Annex 2, such as the PRIMES-TREMOVE transport model (Annex 4, pp. 88-89), TRUST model (Annex 4, pp. 89-90) and COWI/Gartner tool (Annex 4, pp. 90-92). While the first model 'projects the evolution of transport demand by transport mode and transport means', the second one 'is a European scale transport network model covering road, rail and maritime transport' and the third one is used for 'calculating the costs related to the IT system'. Annex 2 explains in greater detail (1) the assumptions of the baseline scenario (including macroeconomic assumptions, fossil fuel price assumptions, techno-economic and specific policy assumptions); (2) time-savings assumptions (e.g. the time per port call spent on reporting formalities is estimated at 60 minutes for ships on fixed routes and 180 minutes for ships on non-fixed routes (IA, p. 101)); and (3) assumptions used to estimate IT systems-related costs. Overall, the availability of recent data on reporting obligations of ships making a port call appears to be good, as does the level of research underpinning the IA, coming from institutions such as the European Maritime Safety Agency, the European Sea Ports Organisation or the International Maritime Organization.

Stakeholder consultation

For the impact assessment, the Commission conducted a stakeholder consultation consisting of an open public consultation (OPC), running for 12 weeks, in line with the BR guidelines, between October 2017 and January 2018, and targeted consultations (TC) (targeted survey, interviews, case study field visit, interviews and workshops).[12] The OPC received 95 replies, while the targeted survey received 111 responses. Replies were received from all maritime Member States, and only two landlocked Member States (AT and HU) did not provide their views on the topic. In addition to Member States, various other stakeholders were consulted including port operators, shipping companies, ship or cargo agents and port

community system providers. Overall, the level of participation was rather high especially among the maritime Member States. The analysis of answers to the stakeholder consultation can be found in Annex 2 of the IA, in accordance with the BR guidelines. The majority of the OPC respondents (82 %) confirmed that the reporting issues would be more efficiently addressed at the EU level and that the EU action should be mandatory (83 %). The vast majority of the respondents (approximately 80 %) considered that harmonisation would have some or high benefits. As to the individual policy options, (decentralised) options A and B were mostly considered moderately effective (33 %) and very effective (23 %) in the OPC. Conversely, (centralised) Option C was considered very effective (33 %) or extremely effective (29 %), with opinions differing considerably among stakeholder categories. In the TC, the preferred option was Option C (30 %), followed by Option A (26 %) and Option B (18 %). The majority of the OPC respondents (82 %) agreed with including national requirements in the mandatory scope of the reporting. Furthermore, the majority of the TC respondents (73 %) agreed to integrate customs and maritime reporting into one window. Also, approximately 81 % of the OPC respondents thought that data-sharing and data re-use has some or high benefits. According to the majority of the OPC (approx. 53 %) and TC (approx. 81 %) respondents, Option C should bring the biggest positive impact. The IA makes an overall reference to the stakeholder consultation throughout the document (as well as in the explanatory memorandum of the proposal) and provides some understanding of how the stakeholders' input informed the IA. It also provides reasons why it did not follow the stakeholders' opinion for the selection of the preferred option (IA, pp. 62-64).

Monitoring and evaluation

The new Commission proposal (article 17) provides that six years after the entry into force of a new regulation, the Commission will review its application and submit a (one-off) report to Parliament and the Council. This report will then assess the functioning of the EMSWe. Where necessary, an evaluation of emerging technologies should be included in the report. Furthermore, the EMSWe's harmonised reporting interface module should be updated (when needed) by the Commission. The Commission's report should be built upon the findings and reports by Member States. The IA's summary also notes that 'regular updates will take place in line with legal and technical developments'. The description of monitoring and evaluation of impacts is limited while progress indicators, success criteria and data sources are only marginally discussed and enumerated in a table (IA, pp. 66-68). The monitoring procedure described in the IA is general and rather vague.

Commission Regulatory Scrutiny Board

On 9 March 2018, the Regulatory Scrutiny Board (RSB) issued a negative opinion on a draft version of the IA. The RSB noted that: (1) the IA did not sufficiently explain the options, including key design aspects, implementation modalities and material differences, which led to a difficult understanding of the cost differences of the options; and (2) the IA did not adequately present stakeholders' views. The RSB recommended to the Commission to revise the IA accordingly and to resubmit it. Its second, this time positive, opinion was issued already on 13 March 2018. While noting that the updated IA presented a transparent choice between the options, the RSB recommended two more improvements: (1) to provide a clear explanation of how the existing systems for reporting formalities function today; and (2) to specify when and on what basis implementation issues will be decided e.g. who will develop and manage the proposed IT systems. As required by the BR toolbox (Tool #12), the IA contains a mandatory annex on the follow-up to the RSB opinion (Annex 1). The RSB's key criticisms seems to have been sufficiently addressed.

Coherence between the Commission's legislative proposal and IA

The proposal's provisions generally appear to follow the recommendations expressed in the IA.

Conclusions

The IA provides a thorough analysis of the current problems related to reporting obligations of ships when calling at a port. The definition of the general and specific objectives of the initiative is consistent. However, some parts of the IA do not entirely follow the requirements of the Better Regulation guidelines,

in that it does not set sufficiently specific and time-bound objectives. The IA does not clearly provide operational objectives and the monitoring of impacts of the chosen option could have been more explicit. The overall presentation of the options is balanced and their alignment with the Commission's aim to modernise Europe's transport system is clear. The analysis focuses on simplifying the reporting obligations of ships through thorough harmonisation. Stakeholder views are reflected in the various sections of the IA and the Commission appears to have made the effort to try to accommodate stakeholder input, despite choosing a different preferred policy option.

ENDNOTES

[1] The new industrial policy strategy, unveiled in 2017, seeks to make European industry stronger and more competitive while allowing it to become or stay the world leader in innovation, digitisation and decarbonisation.

[2] In this regard see also M. Pape, European maritime single window environment, EU legislation in progress, EPRS, European Parliament, forthcoming.

[3] Directive 2010/65/EU of the European Parliament and of the Council of 20 October 2010 on reporting formalities for ships arriving in and/or departing from ports of the Member States and repealing Directive 2002/6/EC.

[4] Ex-post evaluation of Reporting Formalities Directive and Directive on Vessel Traffic Monitoring and Information Systems was outsourced by the European Commission and carried out by PWC in 2017.

[5] See, M. Remáč, European Maritime Single Window, implementation appraisal, EPRS, European Parliament, May 2018, and Legislative train schedule, European Parliament.

[6] The problem tree provided in the IA (figure 1, p. 13) is rather simple, including only problem drivers, the general problem and the consequences.

[7] This includes, for example, the EU policy on reducing emissions from the transport sector, the EU transport social agenda and the EU maritime and customs policy areas.

[8] When excluding the UK from this analysis, this option should lead to cost savings of 21-24 million staff hours, equating to €600-690 million (IA, p. 50).

[9] The costs for EU27 (i.e. without the UK) are €15.2 million.

[10] See, M. Tuominen, Acceptance of electronic freight transport information, EPRS, European Parliament, initial appraisal of a Commission IA, forthcoming.

[11] The EU Reference Scenario is a regular exercise by the Commission to project trends in energy, transport and emissions-related policy areas up to 2050.

[12] The IA provides specific information concerning the consultation events and workshops (IA, p. 76).

This briefing, prepared for the Committee on Transport and Tourism (TRAN), 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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