Revision of the EU system for monitoring, reporting and verifying CO₂ emissions from ships


This briefing provides an initial analysis of the strengths and weaknesses of the European Commission’s impact assessment (IA) accompanying the above-mentioned proposal, adopted on 4 February 2019 and referred to the European Parliament’s Committee on the Environment, Public Health and Food Safety (ENVI).

The Commission proposal intends to align the EU system established by Regulation (EU) 2015/757 (hereinafter the EU MRV Regulation) for monitoring, reporting and verify (inter alia) carbon dioxide (CO₂) emissions from ships (calculated from their fuel consumption), with the 'global' data collection system (DCS) of ships' fuel oil consumption adopted in 2016 by the International Maritime Organization (hereinafter the IMO DCS). The proposed alignment is envisaged to be partial for the reasons provided in the explanatory memorandum of the proposal (p. 11).

As the main objective of the EU MRV Regulation is to contribute directly and indirectly to the reduction of greenhouse gas (GHG) emissions from shipping (IA, p. 7), currently a transport mode not addressed by a specific EU emission reduction objective for 2030, its envisaged amendment is consistent with the regular call of the Parliament for measures aimed at reducing GHG emissions from transport. In its resolution (2013/2135(INI)) of 5 February 2014 on a Commission Green Paper on a 2030 framework for climate and energy policies, the Parliament pointed out that 'all sectors of the economy will need to contribute to the reduction of GHG emissions if the Union is to deliver its fair share of global efforts' (Parliament resolution, p. 12). In its resolution (2016/2327(INI)) of 14 December 2017 on a European strategy for low-emission mobility, the EP specifically called for amending the EU MRV Regulation to align it with the IMO DCS system, while preserving transparency, verification and the collection of data on real transport work.

Problem definition

According to the IA (p. 11), the main problem is to facilitate the simultaneous application of the EU system and the IMO system, streamlining and reducing the administrative burden and associated costs for ship-owners and operators that have to report under both systems, while, at the same time, preserving the objectives of the EU MRV Regulation (explanatory memorandum, p. 11; IA, p. 7 and p. 12). The identified problem originates from the fact that these two systems, although presenting some similarities (for instance, both are applicable, with some exceptions, to all ships greater than 5 000 gross tonnage, (GT), differ in some important aspects, such as scope, monitoring parameters, authorities responsible for verifying the collected data, ship’s monitoring and reporting plan. While the problem has been presented in a clear way, its evolution has not been described in sufficient detail, with the IA merely stating that without EU action, ships calling into EEA ports would have to report under both the IMO and the EU systems (IA, p. 11), requiring an additional administrative effort for shipping companies. As such, the IA would have benefited from a more
evidence-based and articulated description regarding, for instance, an assessment of the impact on projected GHG emissions from shipping without the alignment of the two systems.

Objectives of the initiative

The IA identifies two general objectives (p. 20): a) addressing GHG emission from ships and ports; and b) improving the cost-effectiveness of ships by increasing their energy efficiency and minimising the administrative burden.

While these objectives appear to be clear, they are only partially consistent with the manner in which the problem has been defined, because addressing GHG emissions from ships and ports is not identified among the problems to be tackled specifically by the present proposal, even though the IA states that such emissions are likely to increase significantly if mitigation measures are not put in place (IA, p. 6). However, including the addressing of GHG emissions from ships and ports in the problem definition could be justified by the objective of the original regulation, which is 'to monitor, report and verify CO2 emissions from ships as the first step of a staged approach to reduce greenhouse gas emissions'. Furthermore, the IA does not identify the energy efficiency of ships as a problem to be addressed in order to increase the cost-effectiveness of their use.

The IA does not identify any specific objectives for what the policy intervention is meant to achieve. This is in principle contrary to the Better Regulation guidelines and also appears to be inconsistent with the fact that the questionnaire used for the open public consultation (see below in the Section on Stakeholder Consultation) included a question asking stakeholders to specify the degree of importance they attached to four specific policy objectives (IA, p. 44). The IA identifies one operational objective, 'to facilitate the harmonious and complementary implementation of the systems by EU Member States while preserving the objectives of the EU MRV Regulation' (IA, p. 20). However, this was done before selecting the preferred option, in contradiction with the Commission's Better Regulation guidelines (Tool #16, p. 100), recommending that operational objectives should be logically identified after having selected the preferred option (and when completing the monitoring and evaluation section). In addition, the objective identified by the IA cannot really be considered an operational objective, which is defined in terms of the deliverables of specific policy actions. On the other hand, in the section comparing the policy options (IA, p. 32), the IA states that the baseline (no further action) option (see following section of this document) would allow to meet 'the operational objectives related to reducing shipping emissions, enhancing cost-effectiveness and maintaining a level playing field' (IA, p. 32), all of which are among the original objectives of the EU MRV Regulation (IA, pp. 20-21).

Range of options considered

The IA illustrates succinctly what would happen under the baseline scenario (Option 1) of keeping the two monitoring, reporting and verification systems as they are, without any modification (IA, p. 22). Although their features are described clearly in the section discussing the identified problem (IA, pp. 11-16) and in Annex 5 (IA, pp. 53-56), the IA would have benefited from illustrating the baseline scenario exhaustively, describing thoroughly the consequences for those ship owners and operators that have to comply with two systems that differ in some important aspects. The IA identifies two options in addition to the baseline, based on their potential to reduce the administrative burden for shipping companies and administrations and to ensure that the objectives of the EU MRV Regulation (indicated in endnote 5) are preserved, namely (IA, pp. 22-23):

Option 2 (‘streamlining’): under this option, the EU MRV Regulation would be amended in order to align some of its features with those of the IMO DCS system. After discarding the governance system and the reporting of CO2 emissions from a possible alignment, the rationale for which has been clearly explained (IA, p. 22), the IA shortlists a number of features suitable for a potential alignment, namely: scope; definition of parameters; monitoring parameters; monitoring reporting plans and templates; verification system; and disclosure regime applicable to reported data. The features to align (two monitoring parameters, the definition of three parameters, monitoring reporting plans
and templates – see endnote 6) are chosen after assessing them individually for their likely economic, social, and environmental impacts (IA, pp. 25-31), which are assessed once again at aggregated level when comparing the three policy options. As such, the IA could have benefited from more clarity if this option had been structured differently, for instance, by defining different combinations of features to align partially and identifying them as alternative sub-options. In addition, it would have been preferable to analyse the impacts only once, possibly under the section comparing the options (IA, pp. 32-36), as usually done by the Commission in its IAs, to avoid repetitions. Of note, under the section discussing the monitoring parameters to be aligned (IA, pp. 27-28), the IA highlights that the two systems use slightly different definitions of some parameters, such as distance travelled, time spent at sea, and hours underway. However, the IA would have gained in consistency by choosing to analyse the issue of definitions in the specific section of the IA dealing with aligning definitions (IA, p. 27).

Option 3 (‘high convergence’): under this option, the EU MRV Regulation would be amended ‘to harmonise all its technical aspects’ with the IMO DCS (IA, p. 23). However, based on the overview table on p. 24 (summarising, for each option, the features of the EU MRV Regulation to be aligned to those of the IMO DCS system), it would appear that some technical aspects would be aligned only partially (i.e. ships’ monitoring plans and templates, as well as monitoring parameters), contrary to what was initially stated. According to the IA, Option 3 would amount to adopting the IMO DCS requirements on monitoring, reporting and verification. This would mean that information regarding voyages to or from an EEA port of call would still be collected, but CO₂ emissions from ships at berth or moving within an EEA port and from ships covering domestic (i.e. internal to a Member State) maritime transport would no longer be collected. In addition, the data collected would no longer be verified by independent third parties but checked according to the specific IMO guidelines and reported to the ship’s flag state. The latter would in turn report these data to the IMO, which would make them accessible to IMO members only. However, these data would be aggregated and anonymised to avoid identifying the ship; this is contrary to the EU MRV Regulation, which provides that data should be aggregated on a ‘per-ship’ basis, although without differentiating the ship’s journeys.

Based on the analysis of the impact of the individual features (IA, pp. 25-31), and on the comparison of the three options, the IA considers Option 2 as the preferred option (IA, pp. 32-36). The IA states that the features selected for alignment, i.e. parameter definitions, monitoring parameters, ship’s monitoring plan and templates, are in line with the preferences expressed by stakeholders during the open public consultation (IA, p. 33). However, Options 2 and 3 appear to have been compared clearly only with respect to one aggregate of features (scope, verification system and transparency regime), while it is unclear what combination of features would bring to a more significant reduction of the administrative burden compared to the other aggregate mentioned in Option 2 (definition, monitoring parameters, monitoring plan and templates). In addition, the IA does not provide a detailed and comprehensive comparison among the identified policy options with respect to the Better Regulation criteria of effectiveness, efficiency, coherence, subsidiarity and proportionality; effectiveness and efficiency are mentioned but they refer to a different aggregate of features. Finally, the IA does not provide a summary table detailing the individual components of the three categories of features to be aligned, as would have been reasonable to expect with a view to facilitating the reader’s understanding. In this regard, the explanatory memorandum appears to be clearer in illustrating the proposed modifications resulting from the preferred option (explanatory memorandum, pp. 7-8). The IA does not appear to have succeeded in structuring the options in a convincing way: their range is very limited and Option 2 and Option 3 are both based on the choice of a partial alignment, although Option 3 envisages the harmonisation of all technical aspects of the EU MRV Regulation.

Scope of the impact assessment

The analysis regarding the impacts of the identified options is very succinct, and could have been developed further. Economic and environmental impacts have been quantified only for the
baseline, and refer only to those already quantified in the IA (SWD(2013) 237) supporting the legislative proposal for the EU MRV Regulation (COM(2013) 480). The IA states that social impacts were analysed in depth in the IA accompanying the proposal for the EU MRV Regulation (IA, p. 25), and mentions them (but does not analyse them) only twice (IA, p. 27 and p. 32). The IA states that keeping the two monitoring, reporting and verification systems would only result in a higher administrative burden, but does not quantify it, while mentioning that the administrative burden of the EU MRV Regulation was assessed in the IA carried out in 2013 (IA, p. 51). In this regard, the IA is perhaps referring to the burden linked to the monitoring and reporting of parameters that are differently defined under the two systems (see IA, Table 6.1, p. 29). As regards Option 2, the IA states that the positive impacts of the EU MRV Regulation, which presumably are the same as those identified for the baseline, could be maintained only by leaving some features of the envisaged streamlining unchanged. According to the IA, the administrative burden would be reduced by streamlining some of the features. As regards Option 3, the IA states that 'changes in terms of scope, verification and transparency would significantly undermine the expected environmental, social and economic benefits of the EU MRV Regulation', although this option might contribute more significantly to lowering the administrative burden compared to Option 2 (IA, pp. 32-33). The IA provides a table summarising the assessment of impacts not with respect to the options, as one could have expected, but to the features shortlisted under Option 2 (IA, Table 7.1, p. 35).

Subsidiarity / proportionality

The IA indicates that the legal basis for the current proposal is Article 192 of the Treaty on the Functioning of the European Union (TFEU). In addition, it states that the environmental legal basis enshrined in this article was also used as the legal basis for the EU MRV Regulation when it was adopted in 2015. Finally, it states that its use here is also justified by the fact that the 'principal objective of the [proposed] measure is the protection of the environment through the reduction of GHGs' (IA, p. 19). According to the IA (p. 19), EU action is required under Article 22(3) of the EU MRV Regulation and is justified by the fact that the EU and the IMO systems differ in some important aspects. The added value of EU action, although not explicitly mentioned in the IA, would be linked to maintaining the collection of robust and reliable data on GHG emissions from maritime transport, while avoiding unnecessary duplications and administrative costs resulting from keeping two distinct monitoring and reporting systems. Contrary to the Better Regulation guidelines, the IA does not contain a specific section or assessment of proportionality, nor does it consider this principle when comparing the options. The explanatory memorandum simply states (p. 4) that the proposal complies with the proportionality principle because it does not go beyond what is necessary in order to achieve the objectives of the EU MRV Regulation. No reasoned opinions on whether the proposal complies with the principle of subsidiarity were submitted by national parliaments by the deadline of 2 April 2019.

Budgetary or public finance implications

The explanatory memorandum states that the proposal has no implications for the Union budget (p. 6). The IA report does not contain a specific section dealing with this aspect.

SME test / Competitiveness

The IA does not include any assessment of the impact on SMEs, because the threshold of 5 000 GT established by the EU MRV Regulation excludes 'around 99 % of maritime transport SMEs' (IA, p. 31), based on the estimates made for the IA accompanying the legislative proposal for the EU MRV Regulation. Competitiveness is mentioned only once, where the IA discusses the selection of the indicators to monitor and evaluate progress made towards the reduction of GHG emissions from maritime transport. The IA states that one of the indicators chosen for its proposal to align the two monitoring systems ('annual turnover of European shipbuilders, equipment manufacturers and services providers of the shipping sector') aims 'to ensure the objectives of promoting the
technological improvement of ships, and to improve the competitiveness of the EU maritime supply chains’ by supporting their continued innovation (IA, p. 37). However, it is unclear how the aforementioned indicator could enable the improvement of the EU maritime supply chains’ competitiveness, as stated. An increase in the competitiveness would appear to be the outcome of specifically targeted actions, such as the decision taken in July 2011 by the IMO to make the energy efficiency design index (EEDI) mandatory for new ships, in order to promote the use of more energy efficient equipment and engines (IA, p. 8). Overall, the analysis regarding the impact on competitiveness is rather lacking in depth, and the IA would have benefited from at least some reasoning on the correlation between the intended reduction in the administrative burden and the associated costs for ship-owners and operators brought about by the alignment and the increase in the competitiveness of the shipping industry.

Relations with third countries

The IA briefly mentions third countries when describing the stakeholders that would be mostly affected by the Commission proposal (IA, p. 17), stating that third countries would be involved in the implementation of the IMO DCS, while their ships would be covered by the EU MRV Regulation when calling at EEA ports. However, when describing the international context of the proposal (IA, pp. 8-9), the IA notes that the IMO DCS is part of the MARPOL Convention’s Annex VI, which has not been ratified by around 40 states. As such, it seems that these states would only be subject to the EU MRV Regulation when their ships call at EEA ports.

Simplification and other regulatory implications

As already mentioned, the proposal envisages to facilitate and simplify compliance with the EU system for monitoring, reporting and verifying CO2 emissions from ships and with the IMO data collection system for ships’ fuel oil consumption. The proposal is consistent with the ‘White Paper – Roadmap to a single European transport area’ (COM(2011) 144), in which the Commission stated (p. 9) that EU CO2 emissions from maritime bunker fuels should be reduced by 40 % (and, if feasible, by 50 %) by 2050 compared to 2005 levels. It is also consistent with the commitments contained in Regulation (EU) 2018/842 on binding annual GHG emission reductions by Member States from 2021 to 2030 contributing to meeting the climate target set by the Paris Agreement, adopted on 12 December 2015. Last but not least, it is consistent with the commitments contained in Directive (EU) 2018/410, aimed at enhancing cost-effective emission reductions and low-carbon investments. The explanatory memorandum states (IA, p. 6) that ‘the proposed review of the EU MRV Regulation is assumed to cover the needs for REFIT requiring exploring the potential for simplification and improving the efficiency of the EU legislation’.

Quality of data, research and analysis

The Commission states that the analysis carried out in the IA accompanying its legislative proposal ‘builds on the inception impact assessment published in June 2017 and [on] the public consultation concluded in December 2017’ (IA, p. 5). In addition, the IA mentions the ‘analytical and preparatory work [i.e. the IA]’ accompanying the legislative proposal for the current EU MRV Regulation, SWD(2013) 237 (IA, p. 7). In addition, the IA states that the analysis was supported by a study commissioned by the Commission’s Directorate General on Climate Action (DG CLIMA) (IA, p. 40), which has, however, not been referenced. The IA states, in its Annex 4 illustrating succinctly the modelling aspects of the analysis, that it has not been considered necessary to update the data referring to the quantitative impacts of the EU MRV Regulation, as assessed in 2013, by running again the previously used model that was based on the TIMES architecture (see Part III, Annex VI of SWD(2013) 237, pp. 144-156), or by carrying out a new analysis. According to the IA, this line of action is justified by the ‘short time that has passed since the EU MRV Regulation was adopted [on 29 April 2015 and entered into force on 1 July 2015] and the fact that its implementation has started recently [1 January 2018]’. However, at the same time, the IA states that a ‘refined quantification of impacts cannot be done through existing tools’ for reasons that appear to be unclear, at least based
on the way the text is phrased (IA, p. 52). The IA could have benefited from further explanation building perhaps more extensively on the analysis of the modelling approach developed for the previous IA. More generally, although the analysis carried out in the IA appears to be adequate to support and explain the rationale for the envisaged modifications to the EU MRV Regulation, it is not always clear; as such, the IA would probably have benefited from streamlining some of its text, especially when laying out the policy options and assessing their impacts. As regards the data, the shipping emissions quoted in the IA are those reported in the Third IMO GHG study (IMO, 2014), those included in a report prepared by CE Delft (CE Delft, 2017) that updates the emission projections of the Third IMO GHG study, and those estimated for the transport sector by the European Environmental Agency (EEA) for 2015, although updated estimates are available for 2016.

Stakeholder consultation

The Commission gathered stakeholders’ views through a 12-week open public consultation (OPC) conducted between 7 September and 1 December 2017. The submitted responses are discussed in Annex 2 (IA, pp. 42-48); however, a standalone consultation report does not appear to be available, contrary to what has been indicated on the Commission’s consultations webpage supporting the envisaged proposal. The IA states that 118 responses were submitted by stakeholders from the EU-28, from two EEA countries and from countries outside the EEA (which accounted for about 10% of the total number of respondents), and disaggregates them by stakeholder group (IA, p. 43). Based on the available questionnaire, the consultation appears to have considered all elements that are relevant for taking an informed decision, as it included closed questions covering general and specific policy objectives, the three policy options (including the baseline) envisaged in the Commission proposal, the priority areas for alignment between the EU MRV Regulation system and the IMO DCS system, the parameters to be monitored and reported, the verification system, and the transparency regime applicable to the data collected.

As regards the specific policy objectives to consider when amending the EU MRV Regulation, which have not been mentioned in the IA, the IA states that the shipping sector considered reducing the administrative burden as a very important policy objective, while the other three policy objectives indicated in the consultation questionnaire were considered relatively important (IA, p. 44). On the other hand, reducing the administrative burden was considered ‘not important/somehow important’ by, inter alia, civil society organisations and accreditation bodies (IA, p. 44). In terms of areas to consider for an amendment of the EU MRV Regulation, the IA states that the shipping sector considered the scope and the monitoring and reporting processes (including templates) as its highest priority, while the monitoring and reporting processes were ranked highest by civil society (IA, pp. 44-45).

In addition to the OPC, the IA benefited from the feedback provided by stakeholders to the Commission inception IA (see previous Section on Quality of data, research and analysis), which received 19 replies. In this regard, the IA states that the shipping sector supports the full alignment option between the two systems, although the Commission’s reading of the replies received by the sector is that only the IMO DCS should be kept in place, while a majority of the other respondents supported the partial alignment option, suggesting to keep some elements of the EU MRV Regulation. However, the limited number of responses received casts some doubt on their statistical significance. Finally, the IA benefited from an e-survey organised by external consultants from December 2017 to January 2018, which received 58 responses mostly from the shipping sector (38). Although the number of replies received in this case was higher compared to those received for the inception IA, the text in the IA that reflects their content, perhaps too succinctly (IA, p. 48), does not provide a breakdown of the replies by stakeholders. Finally, the IA mentions four ‘ad hoc’ contributions that were received outside the OPC, and briefly reports on them (p. 48). Overall, it appears that the Commission consulted a wide range of stakeholders whose views were satisfactorily reported in the IA and taken into account when considering the policy options.
Monitoring and evaluation

The IA states that monitoring will be carried out by applying four indicators (pp. 37-38), which were already identified in the context of the analytical work carried out in 2013 to support the legislative proposal for the EU MRV Regulation. This choice is not surprising, considering the identified problem, the operational objectives of the original regulation (IA, pp. 20-21), and the preferred option. The IA points out that as the monitoring and reporting of the current EU MRV Regulation started on 1 January 2018, with the first reports due in June 2019, an evaluation would be possible only from June 2019 onwards, despite the fact that a specific timeline is not indicated in the legislative proposal.

Commission Regulatory Scrutiny Board

On 13 July 2018, the Commission’s Regulatory Scrutiny Board (RSB) adopted a positive opinion on a draft version of the IA report dated 22 June, 'strongly recommending' to improve this report, saying that it should:

1. explain why the IMO DCS system cannot replace the EU MRV Regulation without undermining its purposes, and highlight the areas where partial alignment would be possible;
2. explain the benefits of having the EU system alongside the IMO system, and describe the added value of the features of the EU system;
3. properly identify the essential features of the monitoring, reporting and verification system and the candidates for alignment;
4. better quantify the overall cost of the baseline and the cost savings resulting from the preferred option.

The final version of the IA summarises, in a rather concise way, how it has addressed the RSB’s recommendations (IA, Annex 1, pp. 40-41), including replies to more technical comments not contained in the RSB’s opinion, which appear to have been implemented to a great extent. However, the revised IA still contains Option 3, which the RSB considered artificial and therefore deserving to be discarded upfront. The IA is silent in this regard, and therefore it is unclear whether the option has been changed and kept or simply kept as it was in the original draft. The comments provided in this briefing (see above in the Section on Range of options considered) highlight some shortcomings, partially in line with the RSB’s opinion. In addition, the IA appears to have succeeded only partially to make it clear that 'the European MRV system is not only a data collection system, but also a policy instrument in itself ... aiming to create incentives for ship operators and motivate them to invest in a more efficient fleet', as requested by the RSB. Finally, the IA does not appear to have quantified the cost savings of the preferred option, as required by the RSB.

Coherence between the Commission’s legislative proposal and IA

The proposal appears to be substantially aligned with the analysis carried out in the IA. The legislative proposal clarifies that the monitoring parameter ‘cargo carried’ has been kept on a voluntary basis for the per-voyage monitoring (Article 9) instead of being replaced by the new monitoring parameter ‘deadweight tonnage’, as the analysis included in the IA seems to suggest. Rather, this new parameter has been considered an additional element to be included in the ship’s emission report (Article 11).

Conclusions

While the IA clearly identifies the problem – to facilitate the simultaneous application of the EU and IMO systems – its evolution could have been substantiated further. The general objectives identified by the IA are not entirely consistent with the manner in which the problem was defined; furthermore, there are no specific objectives, contrary to the requirements of the Better Regulation guidelines. The operational objective identified is not defined in operational terms. The only two options considered for further assessment, in addition to the baseline, do not appear to be
substantially very different from each other, with the third option even being judged artificial by the Commission's Regulatory Scrutiny Board. Moreover, the IA does not appear to have succeeded in structuring these two options convincingly. The analysis regarding the impacts of the identified options is very succinct. The Commission consulted a wide range of stakeholders, whose views are satisfactorily reported in the IA and were taken into account when considering the policy options. Overall, the IA appears to have taken on board most of the RSB's recommendations. However, the final revision of the IA report does not appear to have quantified the cost savings of the preferred option, as demanded by the RSB, and still contains Option 3, which the RSB had recommended to discard. As the IA does not explain how it has addressed the Board's suggestion regarding Option 3, it is unclear whether any changes were made to it or it was left untouched. Finally, the legislative proposal seems to be substantially consistent with the analysis carried out in the IA.

ENDNOTES

1 See G. Erbach, Monitoring, reporting and verification of CO2 emissions from maritime transport, EPRS, European Parliament, October 2019.
3 The IMO DCS was adopted on 28 October 2016 by the IMO Marine Environmental Protection Committee (MEPC) with Resolution MEPC.278(70), which amended Chapter 4 of Annex VI ('Regulations for the prevention of air pollution from ships') of the International Convention for the Prevention of Pollution from Ships (MARPOL).
4 The initial strategy from 2018 adopted at the international level for the purpose of reducing GHG emissions from ships is yet to be implemented. See M. Pape, The first climate change strategy for shipping, EPRS, European Parliament, May 2018.
5 The objectives of Regulation (EU) 2015/757 are as follows: 1. to collect robust and verified CO2 emission data for all ships calling at EEA ports, including CO2 emissions from these ships in ports; 2. to provide the necessary transparency concerning data to stimulate the up-take of green ships and of energy efficient behaviours from shipping operators; and 3. to provide robust information in support of future policy discussions, the implementation of policy tools and international objectives or measures, while also contributing directly and indirectly to the reduction of GHG emission from ships (IA, p. 7).
6 Based on the list of monitoring parameters provided in Table 2.2 (IA, p. 16), and on the analysis regarding the policy options, the alignment envisaged by the preferred option would appear to concern (with the corresponding category given in brackets): company, reporting period, distance travelled (definitions), ‘deadweight tonnage’ instead of ‘cargo carried’; ‘hours underway’ instead of ‘time spent at sea’ (monitoring parameters), while the changes regarding the monitoring plan and the reporting templates have not been specified.
7 The four specific policy objectives included in the consultation questionnaire were as follows: 1. provide company-internal tools raising awareness on emission reduction opportunities and triggering action at company level; 2. provide robust information to the markets on ships’ fuel consumption and energy efficiency; 3. collect transparent data for informed policy making; and 4. reduce administrative burden for ships performing EEA-related maritime transport.

This briefing, prepared for the ENVI committee, 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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eprs@ep.europa.eu (contact)

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