Regulatory Policy Committee	OPINION
Impact Assessment (IA)	Non-Road Mobile Machinery Emissions Directive - Extended Flexibility Scheme
Lead Department/Agency	Department for Transport
Stage	Final
Origin	European
IA Number	DfT 00166
Date submitted to RPC	10/09/2012
RPC Opinion date and reference	13/09/2012 RPC12-DfT-1447
Overall Assessment	AMBER

The IA is fit for purpose. However, the IA should provide a clearer explanation of how the cross-check by the department supports the industry estimate of cost savings, which accounts for the large majority of the overall monetised benefit.

Identification of costs and benefits, and the impacts on small firms, public and third sector organisations, individuals and community groups and reflection of these in the choice of options

Benefits. The large majority of the total monetised benefit relates to research and development cost savings and is based on an estimate provided by the UK Construction Equipment Association (CEA). The IA attempts to cross-check this estimate. This involves an assessment of likely hourly wage costs and number of R&D workers currently engaged. However, this assessment is difficult to follow. Whilst the departmental cross-check is sufficient to indicate that the industry estimate is plausible, given the importance of this figure to the overall monetised benefit the IA should provide a clearer explanation of the cross-check's assumed additional wage/charge-out rate and number of workers involved, and a clearer demonstration of how this then supports the industry estimate.

Have the necessary burden reductions required by One-in, One-out been identified and are they robust?

As this proposal is of European origin, with no evidence of going beyond minimum requirements, it is out of scope of 'One-in, One-out' in accordance with the current One-in, One-out Methodology (paragraph 16; ii).

Signed Michael Gibbons, Chairman