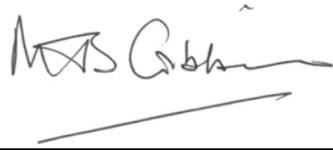


 Regulatory Policy Committee	OPINION	
Impact Assessment (IA)	Transposition of the Revised Waste Framework Directive (Directive 2008/98/EC)	
Lead Department/Agency	Department for Environment, Food & Rural Affairs	
Stage	Final	
Origin	European	
Date submitted to RPC	01/04/2011	
RPC Opinion date and reference	20/04/2011	RPC11-DEFRA-0686(2)
Overall Assessment	AMBER	
<p>The IA is fit for purpose. The issues raised in the previous opinion have been addressed sufficiently for us to conclude that this revised version is fit for purpose. We remain concerned about the uncertainty surrounding benefits and the proposal would gain from early evaluation to inform future policy changes in this area.</p>		
<p>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</p> <p>Issues raised in the previous opinion (of 22/10/2010) have been addressed sufficiently for us to conclude that this revised version is fit for purpose.</p> <p><i>Costs and benefits.</i> The IA still makes it difficult to determine whether the estimated additional costs of the proposal can be justified by the additional benefits resulting from the proposal. This is particularly the case where two areas (waste management plans and waste carriers) appear to incur costs for no clear benefit. In the case of waste carriers, the claim that this specific proposal will lead to additional protection against fly-tipping is not supported by sufficient evidence. However, given the difficulty of establishing the exact benefits of an overarching/ framework Directive, the IA is fit for purpose.</p> <p><i>Evaluation.</i> The IA says that the costs of the waste hierarchy requirements will be justified by only a relatively small increase in waste prevention and diversion. As the IA does not factor the costs and benefits of subsequent changes to existing practices and behaviour into its calculations, the IA's estimates are to some degree incomplete. This proposal would profit from early evaluation to assess its impact and effectiveness on the environment and business performance.</p> <p><i>NPV calculation.</i> Prior to publication, the IA should present the Net Present Value as £-60.9m.</p>		
<p>Have the necessary burden reductions required by One-in, One-out been identified and are they robust?</p> <p>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.</p>		

Signed

Handwritten signature of Michael Gibbons in black ink. The signature is written in a cursive style, with the first name 'Michael' and the last name 'Gibbons' clearly visible. There is a small mark above the 'i' in 'Gibbons' and a long horizontal stroke below the signature.

Michael Gibbons, Chair