

Initial Appraisal of a European Commission Impact Assessment

Marine litter: single-use plastics and fishing gear

Impact assessment (SWD(2018) 254, SWD(2018) 255 (summary)) accompanying a Commission proposal for a directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment

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 28 May 2018 and referred to Parliament's Committee on Environment, Public Health and Food Safety.

According to the Commission, single-use plastics and fishing gear are the two main sources of marine litter in Europe (IA, p. 4). The top 10 most common single-use plastics found on EU beaches by count are: drink bottles and caps, cigarette butts, cotton bud sticks, crisp packets, sanitary applications, plastic bags, straws and stirrers, drink cups, balloons and food containers (IA, p. 11). Fishing gear that is either lost, abandoned or disposed of includes nets and their fragments (ropes), pots and traps, personal equipment and devices. The top 10 single-use plastics and plastics from fishing gear account for 70 % of total beach counts (IA, p. 39). They disintegrate slowly and can have toxic and other harmful environmental impacts. An estimated €630 million are spent each year on coastal and beach cleaning across the EU.¹ In addition to harming the environment, marine litter is damaging to tourism, fisheries and shipping. According to the IA, the existing legislation does not adequately address marine litter, with many measures left to Member States' discretion. Several Member States are taking national action against single-use plastic, for example France, Italy and the UK, and some are considering measures, like Ireland and Portugal. This initiative,² aimed at reducing the environmental harm from single-use plastics and fishing gear, is part of a wider EU approach, namely the [Circular Economy Action Plan](#),³ and the [Plastics Strategy](#),⁴ and is related to the [Common Fisheries Policy Control Regulation](#), the proposal on [port reception facilities for the delivery of waste from ships](#),⁵ and the on-going review of the [fisheries control system](#).

Problem definition

The IA identifies the **problem** as marine litter found on beaches, on the seabed and floating, more specifically macro-plastics coming from single-use plastics and fishing gear (IA, pp. 7-8). It points out that beach litter item counts are internationally accepted as suitable to inform policy in this area, not least because marine species and activities are more affected by the number of items found than by weight (IA, p. 8). The focus on the top 10 most found single-use plastics makes it easier to communicate the relevant policy measures to the public (IA, p. 11) and to adjust it later if that top 10 list changes due to the proposed measures (IA, p. 14). There are multiple **problem drivers** affecting the problem, according to the IA (pp. 23-25):

- Wide availability of plastic as a cheap and convenient option;
- Consumer trend for convenience;
- Market fragmentation – individual initiatives of the Member States will lead to a fragmentation of the European market;
- Market failure – under the current and proposed legislation the cost is borne by ports and shippers/fishermen, not by the producing sector; the proposal on port reception facilities may not provide sufficient incentives for fishermen to bring gear ashore and/or lead to an increase of overall port fees in smaller ports;
- Lack of market incentives - separate collection ('pay as you throw' schemes) and deposit return schemes (DRS) are currently limited to a minority of EU countries;

- Poor waste management infrastructure – insufficient number of bins, infrequent emptying, or improper treatment of waste;
- Consumer behaviour – purchase of plastic and the act of littering, with no knowledge of the impact;
- Slow disintegration of plastic – biodegradation in the marine environment is particularly challenging and there is no recognised method to test it;
- Intentionally abandoned or discarded fishing gear – there is evidence of this happening on a significant scale, despite the existing rules under the EU Fisheries Control Regulation, due, among other things, to lack of incentives to handle gear waste differently;
- Accidental loss of fishing gear – due to gear conflict, adverse weather, vandalism and theft;
- Lack of standardised monitoring, retrieval and locating systems – information exchange and cooperation of authorities to effectively target and retrieve the lost gear is lacking;
- Fishing gear is expensive to recycle – the few existing recycling facilities in Denmark, Lithuania and Slovenia are running below capacity.

The discussion of the problem and its drivers is supported by JRC reports, Eurobarometer surveys, open public consultation results and literature sources. In addition to this, Annex 3 of the IA contains extensive information about the current situation concerning marine litter. The IA discusses the negative economic, environmental and natural resources impacts of single-use plastics and fishing gear waste, stating that there are data limitations in establishing environmental impacts in particular. Overall, the problem definition provided in the IA is coherent and clear, although the link between the problem and its drivers could have been made more specific, for instance by providing a problem tree diagram and/or improving the description of the problem drivers.

Objectives of the initiative

The **general objective** of the Commission proposal is to curb the negative economic, environmental and social impacts arising from plastic marine litter. More **specifically**, it aims to (IA, p. 31):

- limit plastic marine litter (found on the beach, the seabed and floating on the sea surface), and – if still littered – limit the negative economic, environmental and social impacts from: 1) single-use plastics placed on the market in Europe; and 2) abandoned, lost and otherwise discarded fishing gear from the European fishing sector;
- tackle a common and transboundary problem in a coordinated and coherent way across the EU, enabling effective action while complementing national measures;
- ensure a continued proper functioning of the internal market by avoiding fragmentation of measures across Member States;
- avoid disadvantages for small ports and fishing operators who might be disproportionately affected by the development of new port reception facilities and could benefit from additional measures to support the development of specific waste and recycling streams for fishing gear, and from burden sharing mechanisms, such as Extended Producer Responsibility (EPR), that involve gear material producers in the management of the problem;
- ensure a shared direction and framework to guide future actions and to support strategic innovation within the EU on materials, products, technologies and business models (i.e. 'future-proofing').

Except for the objectives addressing market fragmentation and market incentives for small ports and fishing operators, the specific objectives do not correspond to the problem drivers identified. The objective related to fishing gear and disadvantages for small ports is very precise, but the remaining specific objectives are rather general; there is also a certain overlap between the first specific objective and the general problem. Overall, the specific objectives do not follow the intervention logic of 'problem drivers – specific objectives – policy options' as prescribed by the Better Regulation (BR) Guidelines ([Tool #16](#)). The IA sets the operational objectives under the preferred option (pp. 75-76), but the objectives are not time-bound and only one operational objective is measurable, thus not fully meeting the 'SMART' requirements of the BR Guidelines.

Range of options considered

The IA identifies the following options (pp. 39-52):

➤ Option 1 - Baseline

This option covers the current policy framework⁶ and the likely development of the underlying problem drivers. The wide availability of plastic as a cheap and convenient option for single-use applications and the consumer trend for convenience are the two drivers that are forecast to increase (IA, p. 59). The demand for plastic and plastic packaging, and hence their production, are predicted to grow under this option, as are most of the single-use plastic categories. As for waste fishing gear, full implementation of existing measures and proposals already on the table is expected to lead to progress in reducing the amount of fishing gear litter ending up in the sea. No changes or limited changes are expected concerning the other problem drivers.

➤ Option 2 - Single-use plastics (sub-options 2a to 2d)

The analysis for single-use plastics was undertaken on a product-by-product basis and followed several steps: 1) a range of measures was identified based on regional or national experiences and discussions with experts and stakeholders; 2) alternatives to single-use plastics were considered; 3) around 80 to 90 feasible measures were identified across the different products; 4) four sub-options with a varied effectiveness, implementation difficulty and costs were generated on the basis of the feasible measures. These sub-options are summarised in the table below:

Item	Sub-option 2a	Sub-option 2b	Sub-option 2c	Sub-option 2d
Cigarette butts	Information campaigns, voluntary action	2a + EPR-cost of litter	Same as 2b	2b + label, reduction target (30 % by 2025, 50 % by 2030)
Drinks bottles	Information campaigns, voluntary action	2a + EPR-cost of litter, product design	Same as 2b	2b + DRS for beverage containers
Cotton bud sticks	Information campaigns, voluntary action, label	Ban	Ban	Ban
Crisp packets	Information campaigns, voluntary action	2a + EPR-cost of litter	Same as 2b	Same as 2b
Wet wipes	Information campaigns, voluntary action, label	2a + EPR-cost of litter	2b + reduction target (30 % by 2025, 50 % by 2030)	Best practices for waste water treatment works
Sanitary towels	Information campaigns, voluntary action, label	2a + EPR-cost of litter	Same as 2b	2b + reduction target (25 % by 2030)
Cutlery, Stirrers Straws,	Information campaigns, voluntary action	2a + EPR-cost of litter, reduction target (30 % by 2025, 50 % by 2030)	Ban	Ban

Drinks cups and lids, food containers	Information campaigns, voluntary action	2a + EPR-cost of litter, Reduction target (30% by 2025, 50% by 2030)	Same as 2b	Same as 2b, but Reduction target (50 % by 2025, 80 % by 2030)
Balloons	Information campaigns, voluntary action, label	2a + EPR-cost of litter	Same as 2b	Same as 2b
Balloon sticks	Information campaigns, voluntary action, label	2a + EPR-cost of litter	Ban	Ban

Source: IA, p. 46, author

- Sub-option 2a includes two groups of measures: 1) information campaigns and voluntary action **by businesses and industry**; 2) measures related to labelling of improperly flushed items, such as cotton bud sticks, wet wipes and sanitary towels.
- Sub-option 2b includes the following measures in addition to measures envisaged under sub-option 2a: 1) a ban on plastic cotton bud sticks; 2) EPR to contribute to the cost of cleaning up litter; 3) product design measures for drink bottles related to tethered caps; and 4) reduction targets for single-use plastic products where there are alternatives on the market and/or behaviour could change. Member States would be obliged to introduce legally binding reduction targets or other measures, such as levies, DRS, etc.
- Sub-option 2c includes the same measures as sub-option 2b, plus: 1) reduction targets for wet wipes, **30% by 2025 and 50% by 2030**, and 2). bans for group of single-use plastic items, where there are alternatives on the market: cutlery, straws and stirrers, balloon sticks.
- Sub-option 2d includes the following measures: 1) best practices for waste water treatment for wet wipes; 2) DRS or equivalent measure for beverage containers; 3) EPR to cover the full cost of littering crisp packets and sweet wrappers; 4) reduction targets for sensitive single-use plastics, from a public opinion perspective: sanitary towels (25% by 2030) and cigarette butts (50% by 2025 and 80% by 2030); and 5) higher reduction targets for drink cups and lids, food containers (50% by 2025, 80% by 2030).
- Option 3 - fishing gear (sub-options 3a to 3c).

Option 3 includes two types of measures: 1) EPR schemes for waste fishing gear; and 2) product design and distribution measures: a potential ban or levy on materials susceptible to loss and/or difficult to recycle, as well as substitution of plastic products in fisheries. The IA groups type 1 measures into three sub-options that are not mutually exclusive:

- Sub-option 3a: EPR for handling waste management. The producers are responsible for covering the costs of the separate collection of the material from the port and transporting it for treatment (recycling, incineration or landfilling) and related monitoring obligations under the applicable waste legislation;
- Sub-option 3b: EPR with a recycling target and a deposit scheme. The producers are responsible for achieving a target for recycling of fishing gear and for administering and financing a scheme whereby fishermen are paid for the return of end-of-life, damaged gear or fragments of gear;
- Sub-option 3c: EPR for coordinated retrieval. This would include the maintenance of a database of lost gear and retrieval operations including their cost, duration and success rate, which would guide subsequent retrieval operations.

The overall presentation of the options' content is clear, although rather imbalanced: the content of option 2 and its sub-options is discussed at much greater length than option 3. Furthermore, it is not clear

why product design and distribution (type 2) measures were not proposed under option 3. Additionally, policy options do not seem to entirely follow from the specific objectives according to the intervention logic prescribed by the BR Guidelines ([Tool #16](#)). **The preferred option is the combination of sub-option 2c and sub-option 3a.**

Scope of the impact assessment

For option 2 (single-use plastics) and its sub-options, the IA provides an assessment of the environmental, economic and social impacts (pp. 53-61). Impacts were modelled and results were quantified. Based on the results, the IA discusses how adequately each sub-option (2a-2d) would address the underlying problem drivers and pathways of marine litter. It concludes that in terms of effectiveness of reducing marine litter, 2d would be the most effective, but the cost of 2d is much higher than that of 2c; this is why option 2d is not chosen (IA, p. 61). The analysis of option 3 (fishing gear) and its sub-options focuses on the quantitative estimates of financial costs and environmental benefits of reduction of plastic gear waste entering the sea (IA, pp. 66-69). Sub-option 3a, according to the IA, has overall the highest potential impact on the reduction of fishing gear waste contribution to marine litter. Sub-option 3b, on the other hand, is more costly, while option 3c is considered to be disproportionate and potentially duplicative (IA, pp. 71-73). Although effectiveness is mentioned in some parts of the assessment, and efficiency is implied when discussing the costs, the IA does not explicitly compare the sub-options in terms of effectiveness, efficiency, coherence and proportionality, as required by the [BR Guidelines](#). The preferred combination of sub-options (2c and 3a) is estimated to reduce marine litter counts by 56 %, marine litter weight by 4 850 tonnes, greenhouse gas emissions by 2.63 million tonnes, and external costs by €11.1 billion. It would also save consumers €6.5 billion, reduce producer turnover by €3.2 billion, cost Member States or businesses €596 million for information campaigns, cost businesses €1 385 million for business compliance, commercial washing and refill schemes, cost public authorities €511 million for waste management, generate employment for 4 000 full time equivalent posts and reduce the annual input of fishing gear to the sea by 2 600 tonnes. The IA does not discuss the impacts on innovation/research and development or the feasibility for businesses to invest in alternative materials. As for consumer behaviour, the IA states that, as seen with [Directive \(EU\) 2015/720](#) on lightweight plastic carrier bags, the great majority of consumers will accept stringent measures in order to reduce marine litter, in particular when alternatives are available (IA, p. 58). Since consumers would no longer purchase single-use items, they would be likely to benefit financially (IA, p. 57).

Subsidiarity / proportionality

The Commission proposal is based on Articles 192 TFEU (protection of the environment) and Article 114 TFEU (internal market). According to the IA, the EU's right to act with respect to the environmental dimension stems from the fact that marine litter represents both a common and a transboundary challenge, with marine litter travelling considerable distances (IA, p. 32). The IA discusses the added value of the proposed EU action, which lies in providing a framework to prevent and reduce the impact of marine litter in the EU (IA, pp. 32-36). The possibility of amending existing legislation was considered, but it would require the amendment of several existing legal instruments and would lead to further fragmentation of the legal framework, bringing more confusion and complexity for the Member States (IA, p. 73). A directive is the appropriate legal instrument, according to the IA, as it allows for the definition of harmonised and clear objectives and measures, while at the same time letting Member States choose the most appropriate legal, administrative and economic instrument to implement the measures. A regulation, on the other hand, is incompatible with the measures envisaged in the preferred option, for example reduction targets, EPR and information campaigns, because they require the adoption of national and even local transposition and implementation measures to complement already existing regulatory regimes (IA, p. 74). The IA does not check the regulatory options in the light of the principles of subsidiarity or proportionality. At the time of writing, no national parliament has submitted a reasoned opinion on this proposal. The deadline for doing so is 25 July 2018.⁷

Budgetary or public finance implications

According to its explanatory memorandum, the proposal has no implications for the EU budget (p. 15). According to the IA, the preferred option entails €511 million in waste management costs for the Member State administrations (including sewage treatment) and €596 million in information campaign costs (paid for by Member States or businesses) (IA, p. 57-60).

SME test / Competitiveness

According to the IA, most of the 50 000 companies in the EU's plastic converters⁸ sector⁹ are SMEs. Many food service retails are also SMEs (IA, p. 58). However, it only briefly touches upon the implications for these SMEs and does not provide any impact or feasibility estimates. Furthermore, the IA does not specify whether compliance costs would apply to large companies or SMEs, using the generic term 'businesses'.

Simplification and other regulatory implications

According to the IA, the proposed initiative is consistent with and complementary to the current policy framework (pp. 27-30 and pp. 36-37), which does not specifically target the ten most littered items and contains mostly general measures (IA, p. 27). For instance, the revision of the Port Reception Facilities Directive does not envisage setting up separate fishing gear collection and treatment streams for recovery of valuable material used in fishing gear for recycling (IA, p. 28). The planned revision of the Fisheries Control Regulation does not deal with the port side aspects of returning gear, nor provide any incentives to improve on the rate of abandonment of gear itself (IA, p. 29).

Quality of data, research and analysis

According to the IA, beach litter counts are a reasonable indicator of marine litter in general, while tonnage of items best correlates with the generation of micro plastics in the long term (IA, pp. 8-9). The problem definition in the IA is based on monitoring results from 276 beaches in 17 Member States and 4 regional seas during the year 2016, collected by the JRC's Technical Group on Marine Litter Activities. From the regional data it is clear that the Black and the Mediterranean Seas have higher incidences of single-use plastic items in the beach counts (Annex 3, p. 30). The Commission outsourced the support studies to external contractors Eunomia and Deloitte (Annex 1, p. 8). However, these studies are quoted in the bibliography as 'ongoing' and are not available online. Annex 4 briefly summarises the analytical methods and models used in the IA, but does not specify their sources. More details on the modelling of impacts for options 2 and 3 are found in Annexes 6 and 7 of the IA, where the impacts are quantified for all sub-options. The IA states the assumptions behind the single-use plastics model (p. 53 and Annex 6) and acknowledges that it is not possible to differentiate the impacts of individual litter categories and establish their impacts in a statistical way (pp. 17-18). Overall, the quality of modelling could not be verified, because only a few references are provided in Annexes 6 and 7 and the external studies supporting the IA are not available online at the time of writing.

Stakeholder consultation

The IA identifies stakeholders affected by marine litter as: EU and non-EU citizens, fishing industry, public authorities, tourism industry and local businesses, brands, plastics industry and plastics recyclers (IA, p. 26). The following consultation activities were conducted (Annex 2, p. 13):

- Two stakeholder workshops and conferences (2017 and 2018, mainly on single-use plastics);
- Inception IA feedback (4 weeks, 28 responses);
- Interviews and ad-hoc consultations with stakeholders **from public institutions, NGOs, industry associations and businesses** (over 30 stakeholders);
- Flash Eurobarometer on the attitudes of Europeans towards waste management and resource efficiency (2014) and Special Eurobarometer on the attitudes of European citizens towards the environment (2017) (26 595 and 27 881 EU-28 citizens interviewed respectively);
- Open public consultation (8 weeks, 1 807 responses).

The stakeholders were consulted on the problem and its root causes, as well as on a range of specific measures. The stakeholders' views were reflected in the problem definition and the options sections of the main IA report and broken down by sector. The public consultation showed strong support (93 % of respondents) for policies to phase out disposable, non-biodegradable plastic tableware under the preferred option (cups, plates, cutlery and stirrers); however, about 50 % of plastic converters were against such actions (IA, p. 49). A synopsis of the stakeholder consultations is included in the IA (Annex 2), in line with the BR Guidelines, and published as a separate [document](#). The synopsis report explains, among other things, how stakeholder concerns were mitigated in the preferred option. The [analysis](#) of the public consultation responses is available online. However, the IA does not explain why it did not respect the minimum 12 week period for open public consultation required by BR Guidelines [Tool #53](#).

Monitoring and evaluation

According to the IA (p. 74), beach litter counts are the main indicator of progress towards meeting the objectives of the policy initiative. The monitoring requirements for litter on the coastline are established in a revised Commission Decision [2010/477/EU](#) and the methodology is set out in JRC technical reports.¹⁰ The proposal is accompanied by an implementation plan, which contains monitoring and reporting procedures for the Member States and the Commission. Article 13 of the proposal contains provisions for the Member States to set up a database with the assistance of the European Environment Agency. According to article 15 of the proposal, the Commission shall carry out an evaluation six years after the transposition of the directive based on the information available in accordance with article 13.

Commission Regulatory Scrutiny Board

The Regulatory Scrutiny Board (RSB) issued a negative [opinion](#) on a draft version of the IA on 23 March 2018. Its main criticisms were that the report 1) did not state clearly whether focusing on 10 single-use plastic items and fishing gear is meant to significantly reduce marine litter or to address its most hazardous aspect; 2) did not analyse shortcomings of existing environmental, fisheries and maritime legislation in preventing the named items from ending up in the sea; 3) did not argue convincingly that this is a cross-border problem that is best addressed at EU level; 4) did not make clear through the construction, description and comparison of the options that the final package combines the most cost-effective solutions for the different products; and 5) omitted the stakeholder views throughout.

In its second, positive [opinion](#) with reservations, issued on 16 April 2018, the RSB acknowledged that the revised IA showed more clearly the limited scope of the initiative, which addresses macro plastics only, representing a small fraction of the mass of marine litter. Its main observations were that the report 1) still failed to make a compelling case for additional measures on fishing gear, beyond the recent revisions of legislation; 2) did not show that each individual item of the top 10 is harmful, especially those that are least frequently found; and 3) did not analyse why it was better to introduce new legislation for single-use plastics and did not explain why improving implementation of existing legislation, in particular on waste management, was not the way forward. Annex 1 of the IA gives a detailed account of the modifications made to its text following the RSB's recommendations. Overall, the IA seems to have responded to the comments expressed in the RSB opinions.

Coherence between the Commission's legislative proposal and IA

The proposal appears to follow the IA's recommendations, in that it is based on the preferred sub-options 2c and 3a, except that it lacks the consumption reduction target for wet wipes, drinks cups and food containers foreseen under the preferred option (article 4, Annex A) and contains measures not foreseen by the IA, namely EPR (article 8, Annex E) and awareness raising (article 10, Annex G) for lightweight plastic carrier bags, and a separate collection target for drinks bottles (article 9, Annex F).

Conclusions

The IA presents the problem of single-use plastics and waste fishing gear in a coherent and clear manner. It justifies the focus on macro plastic marine litter by stating that marine species and activities are more affected by the number of items found than by weight. Among the strong points of the IA, the overall

presentation of the options' content is clear and the impacts of all sub-options are quantified using modelling techniques. However, the IA contains a number of flaws that reduce its overall quality. Firstly, the IA does not seem to entirely follow the intervention logic 'problem drivers - specific objectives - policy options' as prescribed by the BR Guidelines. The presentation of the options is rather unbalanced: the sub-options related to single-use plastics are discussed at much greater length than those related to fishing gear. The IA does not explicitly compare the sub-options in terms of effectiveness, efficiency, coherence and proportionality, as required by the BR Guidelines, nor does it check the regulatory options in light of the principles of subsidiarity or proportionality. In addition, the IA does not discuss the impacts on innovation/research and development, or the feasibility for businesses to invest in alternative materials. Furthermore, the IA only briefly touches upon the implications for SMEs. This seems surprising, given that the most of the 50 000 companies in the plastic converters sector and many food retailers are SMEs. Moreover, the quality of the IA modelling could not be verified, because only a few references are provided in Annexes 6 and 7 and the external supporting studies are not available online at the time of writing. The IA does not explain why the open public consultation ran for 8 weeks instead of the 12 weeks required by the BR Guidelines. Finally, the proposal does not include the consumption reduction target for wet wipes, drinks cups and food containers foreseen under the preferred option and contains measures for lightweight plastic carrier bags and drinks bottles not envisaged in the IA.

ENDNOTES

- ¹ [EU action to combat marine litter](#), Policy Department for Economic and Scientific Policy, European Parliament, May 2017.
- ² See Bourguignon D., [Single-use plastics and fishing gear: reducing marine litter, EPRS](#), European Parliament, July 2018
- ³ See Bourguignon D., [Circular economy package: four legislative proposals on waste](#), EPRS, European Parliament, March 2018.
- ⁴ See Bourguignon D., [Plastics in a circular economy: opportunities and challenges](#), EPRS, European Parliament, May 2017.
- ⁵ For further information, see Vikolainen V., [Port reception facilities for the delivery of waste from ships](#), initial appraisal of a European Commission impact assessment, EPRS, European Parliament, March 2018.
- ⁶ Waste Framework Directive, Packaging Directive, Marine Strategy Framework Directive, Urban Wastewater Treatment Directive, Water Framework Directive, Port Reception Facilities Directive, Fisheries Control Regulation, European Maritime and Fisheries Fund, UN Guidelines on the Marking of Fishing Gear, and the EU Plastics Strategy.
- ⁷ See the Platform for EU Interparliamentary Exchange (IPEX).
- ⁸ Plastic converters take plastic resin, in the form of pellets, powders and flakes and turn it into products and packaging.
- ⁹ For many single-use plastic items the majority of production takes place outside the EU and only 19 % takes place in the EU. According to the IA, it is difficult to see how impacts on plastic converters fall in or outside the EU (IA, p. 55).
- ¹⁰ Among others, [Guidance for the Monitoring of Marine Litter](#), JRC, European Commission, 2013.

This briefing, prepared for the Committee on Environment, Public Health and Food Safety (ENVI), 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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