

Title: EU Directive to limit Petrol Vapour Emissions from Fuelling of Service Stations Lead department or agency: Defra - Atmosphere and Local Environment Other departments or agencies: Devolved administrations	Impact Assessment (IA)
	IA No:
	Date: 08/02/2011
	Stage: Development/Options
	Source of intervention: EU
	Type of measure: Secondary legislation
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Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

UK requirement to transpose a Directive of the European Parliament and of the Council on Stage II petrol vapour recovery during refuelling of passenger cars/motor vehicles at service stations.

The UK has already introduced legislation to require Stage II controls for certain service stations. The new Directive would extend this to more service stations and would thus control additional emissions of volatile organic compounds (VOCs) to atmosphere. This IA was originally produced during the negotiations to inform the UK position, and an assessment of a range of likely outcomes for the key issues and has been revised to reflect the current position.

What are the policy objectives and the intended effects?

To reduce petrol vapour emissions when refuelling motor vehicles. These emissions contribute to the formation of ground level ozone, contain benzene (a known carcinogen), and have a global warming potential. The Directive must be transposed into domestic legislation by 1 January 2012 and our aim is to do this in an effective, timely and proportionate manner to achieve the objectives of the Directive whilst minimising the burdens on business.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

- 1) Do nothing - this represents the status quo or business as usual situation and includes the Stage II legislation already introduced in the UK.
- 2) Amend the PPC Regulations to extend domestic Stage II legislation to the extent necessary to comply with the requirements of the 2009 Directive. (preferred option)
- 3) Extend domestic Stage II legislation to cover service stations with a throughput lower than the figures specified in the 2009 Directive.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** 02/2014

What is the basis for this review? Duty to review. **If applicable, set sunset clause date:** .n/a

Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?

Yes

SELECT SIGNATORY Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: _____ Date: _____

Summary: Analysis and Evidence

Policy Option 1

Description:

EU Directive (extension over 3,000m³)

Price Base Year 2008	PV Base Year 2005	Time Period Years 16	Net Benefit (Present Value (PV)) (£m)		
			Low: £7m	High: £43m	Best Estimate: £31-43m

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	£38m	£1m	£53m
High	£56m	£1.3m	£79m
Best Estimate			

Description and scale of key monetised costs by 'main affected groups'

Main affected groups - Service station owners/operators: vapour recovery equipment, materials, labour, power, maintenance, compliance checking. Different lifetimes assumed for various equipment. Manufacturers of petrol vapour recovery equipment and monitoring equipment.

Other key non-monetised costs by 'main affected groups'

Key costs of this option are the health costs associated with not delivering additional improvement in Air Quality.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	£0m	£2m	£22m
High	£0m	£6m	£71m
Best Estimate			

Description and scale of key monetised benefits by 'main affected groups'

Avoided damage costs from reduced VOC emissions (interdepartmental group on costs and benefits); avoided greenhouse gas emissions (shadow price of carbon); value of recovered petrol vapours as re-sold fuel.

Other key non-monetised benefits by 'main affected groups'

Certain health/environmental effects (see supporting report). Benefits for equipment suppliers.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

Value of recovered fuel is included in benefits above but discussed in costs section of supporting report (evidence base). Supporting report provides PV and total annualised cost/benefits.

Benefits are highly sensitive to reduction in damage costs from VOC emissions and data used may be subject to review at UK level. Net benefit would be positive with EU estimates of damage costs avoided.

It must also be noted that during the modelling process the timing changed from 2020 to 2018 but this is not considered to significantly alter the analysis.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs:	Benefits:	Net:	No	IN

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	United Kingdom				
From what date will the policy be implemented?	01/01/2012				
Which organisation(s) will enforce the policy?	Local authorities/SEPA in Scotland				
What is the annual change in enforcement cost (£m)?	-£0.12 million				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded:		Non-traded:		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	Costs: 100		Benefits: 100		
Annual cost (%) per organisation size (excl. Transition) (Constant Price)	Micro	< 20	Small	Medium	Large
Are any of these organisations exempt?	Yes/No	No	Yes/No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
Statutory equality duties¹ Statutory Equality Duties Impact Test guidance	No	14
Economic impacts		
Competition Competition Assessment Impact Test guidance	No	14
Small firms Small Firms Impact Test guidance	No	14
Environmental impacts		
Greenhouse gas assessment Greenhouse Gas Assessment Impact Test guidance	Yes/No	15
Wider environmental issues Wider Environmental Issues Impact Test guidance	Yes/No	15
Social impacts		
Health and well-being Health and Well-being Impact Test guidance	Yes/No	15
Human rights Human Rights Impact Test guidance	Yes/No	15
Justice system Justice Impact Test guidance	Yes/No	15
Rural proofing Rural Proofing Impact Test guidance	Yes/No	15
Sustainable development Sustainable Development Impact Test guidance	Yes/No	15

¹ Race, disability and gender Impact assessments are statutory requirements for relevant policies. Equality statutory requirements will be expanded 2011, once the Equality Bill comes into force. Statutory equality duties part of the Equality Bill apply to GB only. The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

References

Include the links to relevant legislation and publications, such as public impact assessments of earlier stages (e.g. Consultation, Final, Enactment) and those of the matching IN or OUTs measures.

No.	Legislation or publication
1	
2	
3	
4	

+ Add another row

Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

Annual profile of monetised costs and benefits* - (£m) constant prices

	Y ₀	Y ₁	Y ₂	Y ₃	Y ₄	Y ₅	Y ₆	Y ₇	Y ₈	Y ₉
Transition costs										
Annual recurring cost										
Total annual costs										
Transition benefits										
Annual recurring benefits										
Total annual benefits										

* For non-monetised benefits please see summary pages and main evidence base section



Microsoft Office
Excel Worksheet

Evidence Base (for summary sheets)

There is discretion for departments and regulators as to how to set out the evidence base. However, it is desirable that the following points are covered:

- Problem under consideration;
- Rationale for intervention;
- Policy objective;
- Description of options considered (including do nothing);
- Costs and benefits of each option (including administrative burden);
- Risks and assumptions;
- Direct costs and benefits to business calculations (following OIOO methodology);
- Wider impacts;
- Summary and preferred option with description of implementation plan.

Inserting text for this section:

Replace the notes on this page with the text for the evidence base.

To maintain consistent formatting, apply Styles from the toolbar. The **Paste Without Format** toolbar button can be used to paste text from other documents in the current style here.

Annexes

Annex 1 should be used to set out the Post Implementation Review Plan as detailed below. Further annexes may be added where the Specific Impact Tests yield information relevant to an overall understanding of policy options.

Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. If the policy is subject to a sunset clause, the review should be carried out sufficiently early that any renewal or amendment to legislation can be enacted before the expiry date. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

<p>Basis of the review: [The basis of the review could be statutory (forming part of the legislation), i.e. a sunset clause or a duty to review, or there could be a political commitment to review (PIR)];</p> <p>Duty to review. In addition to the regular oversight already undertaken on the environmental permitting regime under which petrol stations are currently regulated, a policy review will be undertaken in February 2014, which will inform the European Commission's own review scheduled by 31 December 2014.</p>
<p>Review objective: [Is it intended as a proportionate check that regulation is operating as expected to tackle the problem of concern?; or as a wider exploration of the policy approach taken?; or as a link from policy objective to outcome?]</p> <p>The objective of the review would be to consider any technical or procedural issues arising from the implementation of the requirements, including interpretation of what is meant by a "major refurbishment".</p>
<p>Review approach and rationale: [e.g. describe here the review approach (in-depth evaluation, scope review of monitoring data, scan of stakeholder views, etc.) and the rationale that made choosing such an approach]</p> <p>Feedback/monitoring data from all local authorities responsible for regulating/permitting petrol service stations and feedback from the main industry representative organisations</p>
<p>Baseline: [The current (baseline) position against which the change introduced by the legislation can be measured]</p> <p>The difference between 3,000 & 3,500, the additional number of service stations affected and new proposals requiring new and substantially refurbished petrol stations with a throughput above 500 m3.</p>
<p>Success criteria: [Criteria showing achievement of the policy objectives as set out in the final impact assessment; criteria for modifying or replacing the policy if it does not achieve its objectives]</p> <p>Full compliance by those petrol stations affected by that time, guidance issued has provided a clear and firm basis for consistent and proportionate regulation by local authorities, and at least 90% of petrol stations being rated "low risk".</p>
<p>Monitoring information arrangements: [Provide further details of the planned/existing arrangements in place that will allow a systematic collection of monitoring information for future policy review]</p> <p>Defra and the devolved administrations have established reporting and communication practices with local authorities</p>
<p>Reasons for not planning a review: [If there is no plan to do a PIR please provide reasons here]</p> <p>n/a</p>

Evidence Base (for summary sheets)

SUMMARY

Impact Assessment for European Commission Directive on Stage II petrol vapour recovery

Background

Petrol stations emit vapour when the petrol arrives in tankers and is unloaded, when it is stored at the petrol station, and when it is dispensed. The first two stages are already regulated under so-called Petrol Vapour Recovery Stage I Directive. The Stage II Directive deals with refuelling, generally at larger existing petrol stations and most new ones. The main obligation is to prevent most of the vapours displaced from vehicle tanks when they are being filled with petrol being emitted into the atmosphere.

The attached report was prepared by Entec for the Department for Environment, Food and Rural Affairs (Defra) and the devolved administrations in 2009 as an Impact Assessment of the different options during the negotiations for a new Directive on Stage II petrol vapour recovery. Since it covered what emerged in the adopted Directive, it has been appended to serve as the core of this transposition IA.

The proposal was first tabled in December 2008. The emerging impact assessment work was used to inform the UK position during the period of rapid negotiations in February and March 2009. The proposal secured first reading agreement at the beginning of May 2009. The options considered relate primarily to the two main variables under consideration: the size of new and existing petrol station to be required to fit Stage II equipment (as measured by petrol throughput in cubic metres) and the date from or by which new and existing petrol stations of these sizes must fit the equipment. These were compared with the 'no change' option of current UK legislation which requires the introduction of Stage II for new petrol stations with a throughput of 500m³ or more from 2010 or, in Scotland, 2012; and the upgrading of existing petrol stations with a throughput of 3,500m³ by 1 January 2010 or 2012.

The cover sheet, which precedes this summary, gives the range of costs and benefits applicable to the option of introducing Stage II for new petrol stations with a throughput of 500m³ by 2012 (a nil figure because compliance is already required under UK legislation) and for existing installations above 3,000m³ by no later than 2018. The range of costs and benefits takes account of variables for the lifetime of above-ground petrol dispensers and related equipment, and whether petrol station numbers and petrol sales will be constant or declining. The negotiations were finalised on the same figures, except for bringing forward the 2020 date by two years to 2018, which is not expected to significantly alter the costs or benefits. While the assessment shows a negative cost-benefit balance, the other options under consideration by the EU Council of Ministers would have been even less favourable. The emerging IA analysis was valuable for UK negotiators in arguing for the proposal to reflect existing UK legislation and, subsequently, conceding only limited extension of petrol station regulation. Given all other considerations, this was the best outcome for the UK.

Evidence used

The report includes assessment of the possible costs and benefits of implementing the proposals. The results and data used in their preparations are based on various assumptions and are subject to a number of uncertainties. These have been set out in the relevant sections of the report. The data and methods used are based on nationally or internationally agreed

approaches (where such agreed approaches are available) and some key assumptions have been reviewed by relevant UK Government and industry stakeholders.

Problem definition

Emissions to the atmosphere of volatile organic compounds (VOCs) are associated with a number of environmental and health problems, due to their effects upon local air quality; formation of ozone and photochemical smog; and atmospheric warming and climate change. VOCs are emitted to the atmosphere at various stages during the storage and distribution of petrol. The UK has already taken action to reduce these emissions by implementing a Directive on the control of VOC emissions from the storage of petrol and its distribution from terminals to service stations, so-called Stage I petrol vapour recovery.

Secondly, the UK has introduced legislation to control emissions of VOCs during the refuelling of vehicles from the majority of new service stations and the largest existing service stations (Stage II petrol recovery) as a contribution to achieving compliance with the Emissions Ceilings Directive and the UNECE Gothenburg Protocol. Stage II petrol vapour recovery involves recovering the petrol vapour displaced from the fuel tank of a motor vehicle during refuelling at a service station and transferring that petrol vapour to an underground storage tank at the service station or back to the petrol dispenser for resale.

In order to fulfil commitments under the Thematic Strategy on Air Pollution ; a proposal to amend European legislation on petrol and diesel quality; and provisions in a new Directive on air quality, the European Commission has produced a proposal for a Directive on Stage II petrol vapour recovery. This would establish a minimum level of petrol vapour recovery across Member States and introduce requirements for more extensive deployment of Stage II controls than currently exist in the UK. The Impact Assessment therefore includes detail of an assessment of the additional impacts of introducing more extensive Stage II controls in the UK. The following summarises the key findings of the report:

Businesses affected

The main businesses affected are service stations and owners. They will be required to install, operate, maintain and check the operation of the Stage II petrol vapour recovery equipment.

Businesses producing, supplying and testing Stage II petrol vapour recovery equipment are also affected by the proposals.

The Directive affects the following size of petrol stations:

- existing petrol stations with an annual petrol throughput above 3,000m³ per year from the end of 2018, compared to those with a throughput above 3,500m³ under current domestic legislation;
- all new petrol stations with a throughput above 500m³ per year from 2012 (as per current domestic legislation) and all such petrol stations with a throughput above 100m³ if situated under permanent living quarters or working areas; and
- all petrol stations that undergo major refurbishment from 2012, with the same threshold as for new petrol stations (there is no equivalent in current domestic legislation).

It is estimated that 1,200 – 1,800 petrol stations across the UK will be required to fit equipment to comply with the Stage II Directive by the end of 2018, in addition to those already required to do so under domestic legislation.

Transposition Options

Policy Options and effects on emissions

- 1) Do nothing – this represents the status quo or business as usual situation and includes the Stage II legislation already introduced in the UK.
- 2) Amend the PPC Regulations to extend domestic Stage II legislation to the extent necessary to comply with the following requirements of the 2009 Directive:
- 3) Extend domestic Stage II legislation to cover service stations with a throughput lower than the figures specified in the 2009 Directive.

Consideration of options

In considering transposition of the new Directive we have taken full account of the principles set out in the *Transposition guide: how to implement European directives effectively* (<http://www.berr.gov.uk/whatwedo/bre/policy/scrutinising-new-regulations/preparing-impact-assessments/toolkit/page44257.html>).

The Guide states that it is a requirement of Community law that EU legislation should be implemented in an effective, timely and proportionate manner. Where directives are concerned, the Government's policy is to transpose so as to achieve the objectives of the European measure on time and in accordance with other UK policy goals, including minimising the burdens on business.

Option 1

Option 1 would represent a failure to comply with EU law and result in infraction proceedings and the consequential imposition of significant fines by the European Court of Justice (ECJ). However, the costs and benefits in this Impact Assessment (IA) are appraised relative to a "do-nothing" option in order to act as a reference point for the comparison of costs and benefits.

Option 2

This is our preferred option to secure basic compliance with the Directive (and no more) while not altering current domestic Stage II requirements. There are, however, some choices involved in these options:

- a) we propose to transpose the Directive by means of the PPC Regulations in Scotland. We can find no merit in seeking an alternative legislative vehicle, given that the Stage I Directive and domestic Stage II requirements are already successfully delivered through these Regulations using a simplified permitting approach and risk-based regulation by local authorities. Transposition of the technical requirements of the Stage II Directive will be by reference to the relevant Articles in the Directive (i.e. effectively copy-out); and
- b) to the extent that any terms in the Stage II Directive are not defined, we propose offering guidance as appropriate. In particular, we propose to advise that undergoing a "major refurbishment", which will trigger earlier upgrade to Stage II for existing service stations in the 3-3,500m³ petrol throughput range, should be assessed in terms of whether the refurbishment involves major changes to the pipework and petrol dispensers on the site, ie not changes which for example just result in alterations to the canopy or shop and do not afford an opportunity for fitting Stage II as a logical part of the refurbishment.

NB the European Standards Body, CEN, has received a mandate from the European Commission to produce the harmonised methods and standards referred to in Article 8 of the Directive, and are expected to complete this work by the end of 2011. It is anticipated that the

resulting standard will be closely modelled on current German standards which UK stakeholders have advised are acceptable.

Option 3

This option would constitute 'gold plating' of a Directive.

Costs of implementing the Directive

Estimates have been made of the additional costs of implementing Stage II Legislation in the UK, both for 'typical' service stations of different sizes and for the UK as a whole.

The main costs that would be incurred relate to: materials, equipment and labour associated with making the service station "Stage II ready" (e.g. underground works); costs of vapour recovery equipment; costs associated with loss of fuel sales during installation; additional maintenance and power costs during operation of Stage II equipment; costs of regular checking for correct operation (compliance); and additional fees and charges under the relevant regulatory regime.

Costs for individual service stations

The typical capital costs of installing Stage II controls are estimated to be around £30,000 for a new service station (or an existing service station installing controls as part of a major refurbishment) with annual throughput of 3,000 to 3,500m³. Annualised costs for such service stations are estimated at around £4,000 per year, giving a cost per tonne of VOC emissions abated of £700 to £1,300 per tonne (depending upon whether the value of the recovered fuel is included). If existing service stations were to be required to install Stage II controls outside of scheduled refurbishment works (which is not proposed) the costs could be around £130,000 capital, and annualised costs of around £7,500; with cost per tonne of VOC abated of £1,900 to £2,400 per tonne depending on how long before a planned major refurbishment a service station was required to install Stage II controls.

Annualised costs constitute around 6% of profits from petrol for a service station with petrol throughput between 3,000 and 3,500m³ where controls can be introduced as part of a planned major refurbishment.

Costs for the UK as a whole

With an estimated 1,200 to 1,800 additional number of service stations affected annualised costs are estimated at £4.0 to £7.4 million (£2.7 to £5.5 million if the value of the recovered fuel is deducted). Present value costs are estimated to be around £50 to £80 million (£40 to £60 million) and costs per tonne of VOC emissions reduced around £1,600 to £2,300 per tonne (£1,100 to £1,700 per tonne).

Benefits of implementing the Directive

There would be health and environmental benefits associated with reductions in VOC emissions, including both:

- Reductions in impacts caused by VOCs, particularly those related to ozone exposure (these have been valued according to two different 'damage cost functions' applied in UK assessments and in European Commission CAFE assessments); and
- Reductions in climate change effects caused by the global warming potential of the VOCs released and also their subsequent degradation to CO₂ in the atmosphere. These

will be offset slightly by the increased use of electricity use associated with the power demands of the Stage II equipment. These have been valued according to Government guidance on the 'shadow price of carbon'.

In terms of the former, the best estimate of the value of the annualised damage costs avoided is estimated at £0.06 to £0.10 million per year using the UK damage cost functions. The present value estimates of these benefits are £0.7 to £1.1 million. The equivalent values using the EU CAFE damage cost functions are annualised costs avoided of £4.5 to £6.8 million with present value of £50 to £75 million. It is evident that the value of the damage costs avoided is subject to significant uncertainty and is dependent upon which data sources are used. The values using the UK damage cost functions are significantly lower. The annual value of the greenhouse gas emissions avoided is estimated to be £0.7 to £1.0 million (present value of £8 to £13 million). The various environmental and health benefits that are not included in the above estimates but are described further in section 6 of the Entec IA report.

Comparison of quantified costs and benefits

Table 8.1 of the IA report provides a summary of the additional quantified costs and benefits in the report for Stage II implementation. Emission reductions and associated benefits comparisons are based on emissions in 2020 and relate to the difference between effects of the new legislation and the current legislation. A threshold of 3,000m³ is assumed for applicability to all existing service stations and 500m³ for new service stations and major refurbishment. The ranges given reflect uncertainties in factors including the expected lifetime of Stage II equipment and the expected decline (or not) in petrol station numbers and petrol sales.

Influence of applicable thresholds and implementation dates

The Directive offers no flexibility as to thresholds and implementation.

Statutory equality duties

The race equality impact of the proposals has been considered and it is not expected that the proposals will have any impact on race, disability or gender. (section 7.3.1 of the supporting report, page 31)

Economic impacts

From a consideration of the likely impacts of the Directive relative to the requirements already in place in the UK, it is not expected that the proposals will result in any significant competition issues. The impact assessment prepared for the UK domestic Stage II legislation reached a similar conclusion although it was noted that a minor impact on competition would be that new operators would have to install Stage II controls and incur associated costs whereas existing operators below the petrol threshold would not, thus placing them at a slight disadvantage.

Small Firms Impact

Stakeholders have raised concerns about impacts on small service stations and the possibility of some closures if required to install PVRII. Costs for a typical service station in that the annualised costs of installing Stage II controls for a small service station where not done as part of a scheduled major refurbishment are greater than the estimated annual profits from petrol sales. However, the continuing rationalisation of service stations is significantly reducing numbers, with smaller stations often particularly vulnerable. Inasmuch as PVRII slightly lowers the current threshold, transposition could increase pressures; on the other hand, smaller existing petrol stations are exempt from PVRII requirements unless they are subject to major refurbishment or located under permanent living quarters or working areas. Also any new petrol

station with a petrol throughput greater than 500m³ is covered. (section 7.2 of the supporting report, page 30)

Environmental Impacts and Wider Environmental Issues.

The impacts of the proposals on environmental outcomes are covered in this IA under “Benefits of implementing the Directive”. In essence, the main impact associated with the proposal would be a reduction in emissions of VOCs to the atmosphere, with associated reductions in environmental and health damage. More detail on the various environmental and health benefits can be found in section 6 of the Entec report.

Health and Wellbeing

The PVRII Directive will further reduce emission of VOCs with the benefits set out under “problem Definition”. The benefits ought broadly to be spread amongst all groups in society, with particular advantage to young and elderly people with greater sensitivity of their lungs or reduced immune system.

Human Rights

The Directive is not expected to impact on any of the rights enshrined in any of the 14 articles of the European Convention on Human Rights, or the 3 articles of the first Protocol thereto. (section 7.3.3 of the supporting report, page 31)

Rural Proofing

It is recognised that most small service stations are located in rural areas and provide a valuable service to local communities. Closure of service stations in rural areas could result in a number of direct and indirect economic (e.g. increased fuel costs from having to drive further for fuel), social (e.g. reduced access to services) and environmental (e.g. increased emissions from travelling further for refuelling) impacts. However, as mentioned in the section above “Small Firms Impact” few small petrol stations are likely to be affected.

Sustainable Development

The Directive represents a sustainable balance having regard to achieving VOC emission reductions from refuelling, and the need to maintain a viable network of service stations.

Legal Aid

The Directive mainly impacts on large operators of petrol stations, supermarket chains etc. It is very unlikely such operators would qualify for legal aid.