

COMMITTEE OF THE REGIONS
– DIRECTORATE E –
Horizontal Policies and Networks



QUESTIONNAIRE

"ASSESSMENT ON TERRITORIAL IMPACTS"

Submitted by Michael Schneider (DE/EPP)

Michael Schneider is the rapporteur for the CoR own initiative opinion on *Assessment on territorial impacts*. This opinion will discuss the European Commission's Staff Working Document on **Assessing territorial impacts: operational guidance on how to assess regional and local impacts within the Commission Impact Assessment system, SWD (2013) 3 final**. This questionnaire identifies important issues for the Committee of the Regions and is designed to assist in the drafting of the own initiative opinion on the assessment of territorial impacts.

Please complete and submit by **20 March 2013**. If you are member of the Subsidiarity Monitoring Network you can upload the completed questionnaire directly onto the Subsidiarity Monitoring Network website (<http://subsidiarity.cor.europa.eu> – remember to log in). Alternatively and in case you are not member of the Network, you can send it by email to subsidiarity@cor.europa.eu.

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If necessary, you can also contact the CoR Data Protection Officer (data.protection@cor.europa.eu). You have the right of recourse to the European Data Protection Supervisor at any time (www.edps.europa.eu). Please note that the questionnaire with your contribution and your contact details will be published online. Your questionnaire might be transmitted to CoR Rapporteurs and other EU institutions for information. If you do not wish so, please inform us accordingly.

QUESTIONS

1. The Staff Working Document states that: *"the guidance provided here also responds to a request from the Member States, expressed in the debate following the 2008 Green Paper on Territorial Cohesion and under the Polish EU Presidency in 2011 as part of the Territorial Agenda process"*.

a) Do you consider that the document published by the European Commission meets the expectations and the ideas expressed in the political debate raised after the publication of the Green Paper on Territorial Cohesion in 2008? Do you believe there is a need for greater follow-up to this debate on territorial cohesion and if yes, could you give some concrete examples?

The Commission's working document fully ties in with the discussion that followed the publication of the Green Paper. However, the problem is whether in so doing it properly explores the issue of assessing territorial impacts, i.e. whether it addresses this subject in sufficient detail. There are many possibilities for follow-up to this discussion and to the development of territorial assessment techniques. Since this ties in with the subsequent questions in this questionnaire, such proposals will be set out in the following answers. At this point, one might conclude that the Commission's working document deals with the issue too generally.

2. order to better coordinate the territorial impact of sectoral EU policies, there needs to be a better understanding and measurement of those impacts. The Green Paper on Territorial Cohesion already focused on this point, stating that "improving territorial cohesion implies better coordination between sectoral and territorial policies and improved coherence between territorial interventions".

b) Do you believe that the European Commission's proposal can be an effective instrument able to improve coordination between EU sectoral policies having territorial impacts? In your view what else should/could be done?

The Commission's proposal undoubtedly facilitates coordination between sectoral policies. For the time being, however, it should be regarded as an initial small step in this direction. Above all, the scope of the assessment should be broadened. The most important thing however is for the proposed territorial impact assessment techniques to be applied mainly to the establishment/formulation of

sectoral policies, and not just to the assessment of their impact. Impact assessment forms the basis for policy coordination in a very limited way.

Linked to this issue is a more general problem. The European Union does not have a single integrated policy, a single integrated planning document. This role is not filled by Europe 2020. Herein lies the cause of the low level of sectoral policy integration. Any attempts at measures, including the Commission document, are only half measures, i.e. the removal of effects.

3. The Staff Working Document provides operational and methodological guidance on how to answer a range of questions regarding the potential territorial impact of a given proposal. Nevertheless, it underlines that assessing territorial impacts is not mandatory, and states that it is just a tool that can be helpful to enhance the policy coherence of some policy proposals.

c) Do you consider that territorial impact assessments should be made compulsory for those sectoral policies having a territorial impact? If yes, in your opinion for which sectoral policies should the assessment of territorial impacts be made mandatory?

Territorial impact assessment is not just a tool that can be helpful to enhance coherence, especially policy coherence, as stated in point 3 above. Policy coherence is best achieved at the policy formulation rather than the policy implementation stage.

To answer the question directly, territorial impact assessments of sectoral policies should definitely be made compulsory, especially as individual sectoral policies are not based on a single coherent document. Furthermore, this obligation should be extended and cover:

- Consideration of the territorial dimension at the sectoral policy evaluation and formulation stage;
- Ex-ante assessment of these policies, and only then;
- Consideration of the territorial dimension in the current coordination of these policies' implementation; and finally
- Ex-post assessment

This obligation should cover every sectoral policy, regardless of its scope. The only outstanding issue to be discussed is the scope of application of this assessment tool, depending on the type of policy.

4. The Staff Working Document states that a territorial impact assessment should be carried out when the proposal explicitly focuses on specific territories or when the proposal risks of having a large asymmetric territorial impact (outlier impact). It also highlights different methods that can be used to assess territorial impacts. In particular, it mentions qualitative and quantitative analysis. These tools and methodologies should be used by the different

Directorates-General at the European Commission when preparing territorial impact assessments for proposals they are responsible for.

- d) Do you consider the data, methodology and tools proposed for supporting territorial impact assessments (such as ESPON ARTS¹ or QUICKScan) are sufficient to measure the potential territorial impacts a given proposal could have in your region? Would you propose any other type of tools/methodology?**
- e) Do you believe the complexity of territorial impact assessments require them to be carried out by a single specialised entity (one-stop shop) or do you prefer the idea of a decentralised system as proposed in the Staff Working Document?**

As regards the conclusions drawn in point 4, it should be noted that territorial impact assessment should cover every situation, and not just when a specific Commission initiative concerns a particular territory. This is an unjustified reversal of the problem's logic because only a territorial impact analysis can determine whether a given policy has a territorial dimension. This also relates to the question of impact asymmetry. Asymmetry should be the outcome of the assessment and not the condition for whether or not to use a territorial analysis. In addition, the conclusion drawn in point 4 is inconsistent with the earlier questions. Point 4 talks about applying the territorial impact assessment to the drafting of proposals, whereas earlier points talk about impact assessment.

In response to the questions, it is fair to say that:

d) the proposed analytical methods represent an important step, but the typology of specific areas must be developed considerably. Limiting this to sparsely populated, outlying or island regions is a gross simplification. A successful strategy in this regard is provided by the experiences of Poland. In Polish strategy documents, for the purposes of assessment a typology of operational areas (national spatial planning concept) and of strategy intervention areas (national regional development strategy) is used, which reflect much more effectively the variety of development possibilities and problems of individual areas and their diversity. However, as regards specific analysis methods, it would be worth extending the assessment to include multi-dimensional spatial analysis (e.g. analysis of factors, main components, etc.), not limited to a simple illustration of phenomena in the form of cartograms or cartodiagrammes.

e) it is worth giving thought to the carrying out of assessments by a single specialised body at Community level. This would ensure the comparability of results in relation to various policies. However, this must be a body outside of the European Commission. The best solution would be to set up a body under the Committee of the Regions.

¹ http://www.espon.eu/main/Menu_Projects/Menu_AppliedResearch/arts.html.

5. Multilevel Governance and partnerships are key factors in the implementation of territorial cohesion, focussing on strengthening a place-based approach. The Committee of the Regions has already asked for the assessment of specific territorial impacts and recalls the potential role² of the CoR in assisting the European Commission in the process of Impact Assessment as well as to be associated to some of the EC's initiatives towards improvements in the capacity building of regional and local authorities³.

f) What should the specific measures providing for the involvement of local and regional authorities be in these exercises?

g) What role do you see for the Committee of the Regions in this context?

f) local and regional authorities should be one of the partners in assessing the territorial dimension of the Commission's proposals. These bodies should be consulted about any external assessments. As regards conducting a territorial dimension assessment of other policies, local and regional authorities should carry out an assessment of their own policies from this point of view.

g) as regards the role of the Committee of the Regions mentioned in the answer to question 4 e), it should act as a coordinator of any actions relating to territorial dimension assessment.

6. The Committee of the Regions has already asked for territorial cohesion to be strengthened in relation to the EU2020 Strategy. One possibility for this could be not to confine the assessment of territorial impacts to legislative proposals and to extend them to other documents, such as key planning documents, such as the Annual Growth Survey.

h) Do you think there should be a territorial dimension of the EU2020 policy cycle?

i) Do you consider the Annual Growth Survey (as a key planning document for the launch of the annual EU2020 policy cycle) should contain a territorial impact assessment?

j) In your opinion, should Territorial Impact Assessments also be carried out at Member State level?

To answer all of the questions together, it should be stressed that the territorial dimension of the Europe 2020 strategy should be an inherent trait of this document, but is not. Since insufficient use was made of this aspect when drawing up the Europe 2020 strategy, then it should be taken into account in the impact assessment. This should be taken into consideration in the Annual Growth Survey. It is also worth considering carrying out a territorial impact analysis at national level, not least in connection with the

²

See section 5.5 of the EC's Staff Working Document: "Under the Protocol on Cooperation between the Commission and the Committee of the Regions (2012) the Commission services may ask for support from the Committee in preparing its assessment.

³

CdR 353/2010, CoR Opinion on Smart Regulation.

national reform programmes.

Ultimately, analyses of territorial impact, not only of legislative issues, but also policies and their implementation, should take place at all levels – Community, national and regional, applying methods on a uniform basis that guarantee the comparability of results, at all stages - planning, implementation and ex post assessment.