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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?

Central European Service for Cross-border Initiatives was established in 2009 for supporting cross-border cooperation along the Hungarian borders and in Central Europe. As our association is involved mainly in cross-border issues we can summarize our point of view related to this field.

By our experiences territorial cohesion is the key factor of the development in border regions. However since the Torremolinos Charter was signed the principle of territorial cohesion has undergone a remarkable evolution, it is not accepted thoroughly at Community level.

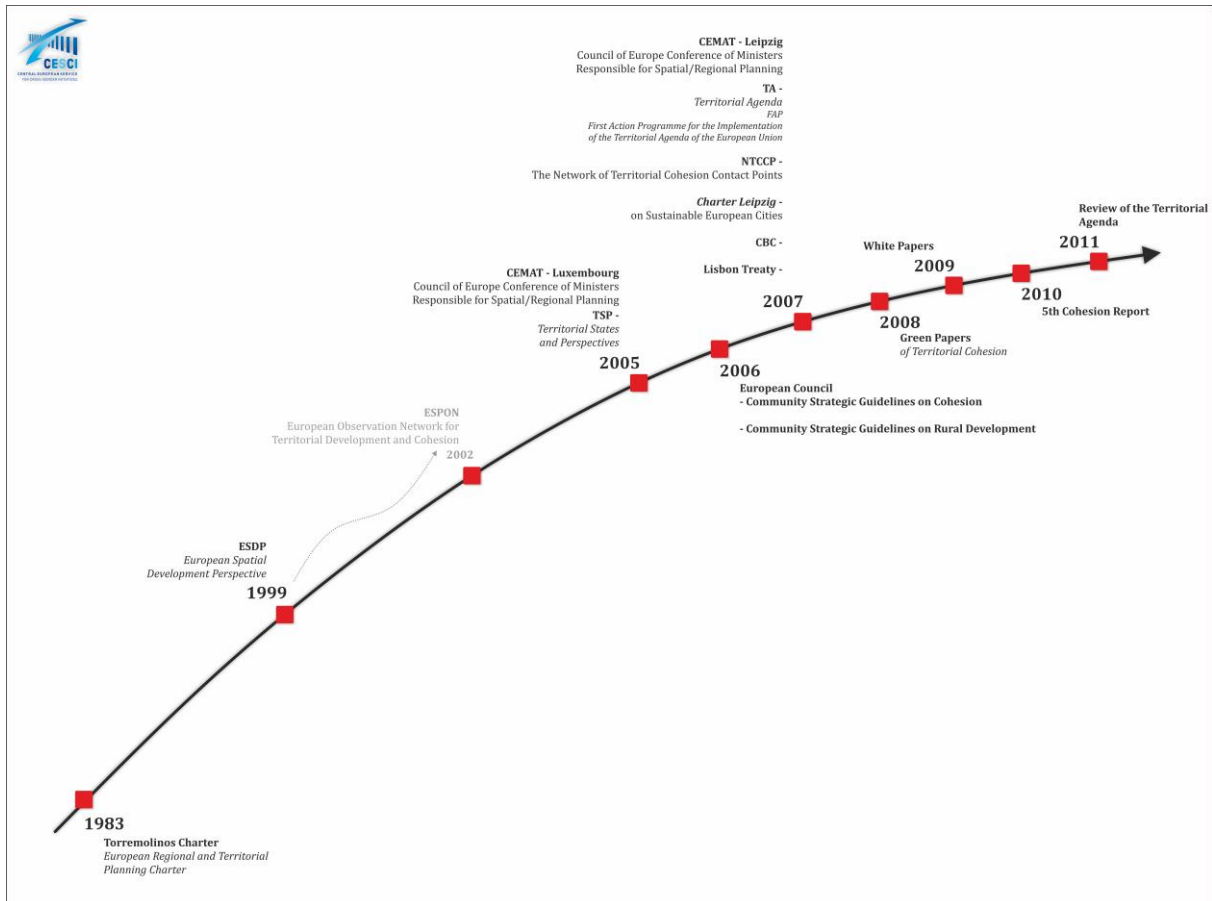


Figure 1: Development of thematization of territorial cohesion

According to the provisions of draft regulations of Cohesion Policy operational programmes should concentrate the resources on the fulfilment of four thematic objectives (Common, Art 9). In our view, this requirement endangers the future of border areas because in the case of long internal borders (such as e.g. German-Polish: 456; Hungarian-Slovak: 691 km; French-Spanish: 623 km; Romanian-Bulgarian: 608 km) it is nearly impossible to find common objectives. Bratislava region which is situated on the Western part of the Hungarian-Slovak border, is one of the most developed regions in Central Europe where the GDP per capita in 2011 reached 178% of the EU average, the unemployment rate was 5,41%. The same time on the Eastern part of the same border the GDP was below 40%, the unemployment rate then more than 34%. Consequently (and paradoxically) the decision makers by forcing the tool of thematic objectives will fail the original purpose: to facilitate effective use of financial resources.

Instead of *thematic concentration* there is a need for *territorial concentration* of resources in the case of **territorial programmes**. The core principle of territorial concentration is

territorial cohesion which should determine the programming, the strategic planning and project implementation in border regions. This approach would facilitate gradual spiritualization of borders.

The draft regulations propose to use territorially integrated tools such as 'joint action plan', 'integrated territorial investment' and 'community-led local development' but the use of these instruments will be restricted due to the general preference of thematic objectives as well as the lack of proper guides of each new instrument.

In conclusion, the importance of the debate is given by the need for a more integrated, territorial approach which is crucial from the point of view of decreasing disparities.

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 role of this document is important as it points at the importance of territorial impacts but as a proposal it will unlikely launch revolutionary changes.

This document is also hard to be considered as a scientific and methodological base for studying territorial cohesion. ESPON's research projects such as TERCO (European Territorial Cooperation as a Factor of Growth, Jobs and Quality of Life) or INTERCO (Indicators of Territorial Cohesion) have already established such an information base for the scientific research of territorial cohesion.

A possible role of this document is to facilitate a continuous dialogue on how territorial aspects can colligate the entirety of sectoral policies to make sectoral interventions more efficient and so to achieve a higher level of territorial cohesion.

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?

Each sectoral policy has *territorial impacts*, and by forming regular platforms for communication among sectoral and territorial policy makers, the common work can help to focus at these territorial impacts.

Nevertheless, in the case of territorial programmes better use of *territorial capital* should be in focus which can be guaranteed by deep analysis of territorial factors, impacts and internal (territorial, economic and social) cohesion.

For sectoral programmes we do not see inevitably necessary to prescribe territorial impacts.

d) Do you consider the data, methodology and tools proposed for supporting territorial impact assessments (such as ESPON ARTS 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?

Initiatives such as ESPON ARTS or QUICKScan or other ESPON researches such as the above mentioned TERCO and INTERCO projects are important initiatives to create an overall methodological toolkit. The principal problem is not the lack of sufficient methodological base but rather the opposite: a great variety of methodological systems have already been created but the standardization of these systems is slightly advanced and the transferability of data is restricted.

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?

The evaluation of territorial impacts needs a large and various scale of methodological tools and instruments. However, it is clear that a managing and coordinating body is essential to coordinate the assessment and a common methodological framework is also necessary to ensure the transferability of data and information, and so to avoid the above described difficulties.

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

1. In our view, not the involvement of local level is the biggest problem concerning territorial assessment but the lack of proper and comparable data on this level. It is really hard to perform proper territorial analyses when data are missing or incompatible in border regions.

2. The role of territorial approach as well as the importance of territorial cohesion will be more widely acknowledged if the European Institutions put stronger emphasis on them. When new tools and methods appear in official documents and financing is matched these new instruments, local level gradually becomes involved.

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

On the one hand, the Committee of the Regions as an EU body has an important political role on international level and by providing a direct voice for sub-national authorities it is also an important institution for local and regional bodies. On the other, it would be important that the CoR stands for this territorial approach on the fields of common policies and at the same time to create a well-defined common framework for the internal work e.g. by promoting the elaboration of a common methodological base. For this purpose we consider useful solution to establish an international platform of think-tanks.

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

Definitely, it is hard to strengthen the territorial cohesion of the community unless territorial differences are reviewed. It should make up an essential part of the long-term purposes of the European Union. Territorial imbalances are still among the greatest challenges that the community have to face as they endanger not only the territorial but also the social, political and economic cohesion of the European Union.

We see this question the most important one related to cross-border cooperation. That is the reason why our association has elaborated a new, cohesion-based methodology for cross-border strategic planning and have been working-out a guide for cross-border integrated territorial investments.

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?

As mentioned above it is important to have an overall review on the territorial imbalances of the EU and to create an appropriate data base for planning of new policies. The growth rate

of the European Union shows large territorial differences. Observing the territorial components of the economic growth is thus essential for the better understanding of the economic growth on community level.

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

Member state level is the principal level of decision-making but as for the territorial imbalances it is not the adequate level since territorial inequalities seems to be having grown within the countries in the recent years. In political sense it is essential to involve the member states into this process but the assesment and other sorts of research should be carried out mainly at regional level.

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