

**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](mailto:subsidiarity@cor.europa.eu).

<b>Name of Authority:</b>	
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<b>Member of</b>	SMN Europe 2020 Monitoring Platform Other

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*If necessary, you can also contact the CoR Data Protection Officer ([data.protection@cor.europa.eu](mailto:data.protection@cor.europa.eu)). You have the right of recourse to the European Data Protection Supervisor at any time ([www.edps.europa.eu](http://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 2008 Green Paper feeds into the ongoing discussions on concepts associated with territorial cohesion. It encourages us to take account of the practical, grassroots impact of policies (such as transport and agriculture policies) and raises the question of how to ensure harmonious development of various territories by means of various policies and particularly European cohesion policy.

Territorial cohesion asks us to reconcile administrative and geographical differences (small towns, urban areas, metropolitan areas) with a guarantee of equal opportunities for all.

The document published by the Commission takes this approach, as does the debate which followed the publication of the green paper.

With 2007-2013 cohesion policy, people began to rethink the definition of "territory" and the way of making policy choices. Citizens are increasingly less limited by official administrative borders while at the same time the new challenges of globalisation, climate change and migration have called for joint European action at every level of the decision-making process.

We therefore need an integrated and participatory approach to the process of policy-making at every level. We need to improve the coordination of sectoral and territorial policies, even where policies remain independent. We also need more partnerships to consolidate the combination of high-level European steering and bottom-up policy-making shaped by local wishes and needs. Thought could be given to improving multi-level coordination by encouraging the flow of information, both vertically and horizontally, between actors in policies or by means of information meetings.

For the new planning period 2014-2020, real consideration will be given to the territorial approach through the mechanisms of integrated territorial investment, participatory local development and local action plans.

2. In 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 only instrument based on a territorial impact assessment which can be used at regional level to coordinate sectoral policies with territorial impact is the planning instrument underpinning cohesion policy. Cohesion policy is the only real European policy which coordinates a number of sectoral policies.

From the documents on the new 2014-2020 planning policy and in particular the proposals for regulations, it is clear that the Commission is focusing on integrating the funds: 2014 will see the launch of an integrated territorial development strategy, the result of rethinking the sectoral design of the various European funds. The regions and central administrations will have to take up the challenge of tapping the potential of this integration over the next months; the success of the new planning period will depend on this.

Although there are still some grey areas regarding the legal framework and the implementation of cohesion policy from 2014, the Commission proposal lays the groundwork for a development model where synergies between the funds can make a difference in terms of effectiveness of territorial policies. The regions' main challenge will be to disseminate a new meaning of integration: from ad hoc solutions on a case-by-case basis to a **paradigm of development or policy of permanent coordination between funds**.

In light of the positive experience already gained during this planning period, the regions must take this opportunity to ensure that by the 2014 deadline, they have identified the policy-mix most suited to the (new) territorial requirements.

Our position is to start from the basis of a good programme which ensures that sectoral policies are effective, including those which are independent but coordinated at territorial level. For 2014-2020, the Commission has planned for a number of ad hoc instruments: joint action plans, designed to support groups of operations which come under various funds and various programmes (e.g. national and regional); community-led local development initiatives, to promote a genuinely integrated approach to territorial development; and the integrated territorial investment instrument.

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?**

The impact assessment for local-level sectoral policies has already, we feel, been applied (for example the assessment of the social impact and competitiveness tests). A territorial impact assessment, as set out in the Commission document, would be even more useful and accordingly should be made compulsory for sectoral policies as well. While territorial cohesion is enshrined in the treaties as a goal of EU action, the process of planning these policies still requires assessments focusing on local needs or the distribution of costs and benefits. One specific example is innovation policies based on the concept of specialisation. Specialisation also means concentration, and it is necessary, by means of territorial impact assessments, to endeavour to understand how to reconcile territorial cohesion and specialisation policies. This assessment could help understand whether these policies should be withdrawn or amended, or accompanied by additional policies with the aim of avoiding an increase in the innovation lag between regions.

It would also be necessary to try to bring the territorial impact assessment closer to sectoral policies and, more generally, all policies subject to it when those policies are actually planned. An excessive time lag between assessment and planning would lead to the danger of the assessment becoming outdated.

A further proposal, aiming to make these policies more effective, would be to make some type of intermediary assessment compulsory. An ongoing assessment, covering the entire period that the policy is in force, could only make it more effective and enable administrations to act in good time to improve and fine tune it (for instance, consider cohesion policy and the option of ongoing assessment).

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 ARTS<sup>1</sup> 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?**

The methodology and instruments for assessment proposed in the Commission working document certainly seem appropriate for the identification of local features which will be used as a basis for the subsequent policy assessment and the choice between various policy options. The ESPON ARTS model is already widely known and consolidated, and rolling it out on a large scale can only entrench the professionalism which can only be guaranteed if it remains effective.

We have no other instruments or methods to propose and so wish to underline something which became clear while this instrument was being implemented: indicators for use in assessments should be clarified and rationalised as far as possible without making them ineffective. All too often, the excessive number of indicators and their generic nature makes it impossible to fit the questions to the results expected from such an exercise, with a view to giving a clear picture of the local situation and so being able to make an informed choice. This makes it difficult to use them and implement them correctly.

On this point, a number of major initiatives are currently underway, for example regarding the ESPON programme, in which we have taken part as a region for the Espon Terrevi project *Territorial Evidence Packs for Structural Funds Programmes (Territorial evidence for delivering Europe 2020)*.

Partly in light of the Espon Terrevi project, we can say that in order to assess territories' economic and social progress, on which cohesion policy will be built, a number of measures are necessary, such as:

- 1) supplementing/integrating the GDP indicator with environmental and social indicators;
- 2) ensuring that almost real-time information is available to support the decision-making process;
- 3) ensuring that more accurate information is available on distribution and inequalities, preparing a European table for assessing sustainable development.

These measures should not be only ex-post assessment instruments; they should also be useful for decision-making. GDP cannot be the only indicator for gauging economic results: appropriate indicators help pinpoint differences in income, availability of public services, quality of healthcare and supply of cultural and professional training at regional and local level in the EU.

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<sup>1</sup> [http://www.espon.eu/main/Menu\\_Projects/Menu\\_AppliedResearch/arts.html](http://www.espon.eu/main/Menu_Projects/Menu_AppliedResearch/arts.html).

Regional and local bodies can be pivotal for adopting and disseminating a more comprehensive assessment criterion for dynamics relevant to regions and society (in economic, environmental and social terms), provided they have the necessary capacity and resources.

The complexity of territorial impact assessments must not be underestimated. Not all regional administrations are able, with their in-house statistical departments, to cope with the implementation of instruments and methodologies for territorial impact assessment. Nonetheless, we feel that it would be more useful to set up a decentralised assessment system; this system would be able to prevent any "ironing out" in the assessment of territorial needs, unlike the other proposed solutions. Given that the primary imperative is to obtain a detailed understanding of the features and needs of the territory, this danger must be eliminated.

It is therefore essential to increase staff training in order to achieve widespread statistical and econometric self-sufficiency of territorial administrations.

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 role<sup>2</sup> 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 authorities<sup>3</sup>.

**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?**

With the approval of the Treaty of Lisbon and the introduction of territorial cohesion as one of the EU's objectives, the role of the CoR has grown significantly.

The recently amended cooperation agreement between the European Commission and the CoR sets out the road ahead with regard to the territorial impact assessment. The agreement clearly states that "The Commission services may ask for support from the Committee in preparing its impact assessments. The Committee's platforms and networks may provide a good access point to regional and local authorities and could therefore enable the Commission to reinforce the analysis of regional and local aspects in impact assessments if deemed necessary. The Committee will summarise its activities in this field in an annual report transmitted to the Commission."

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<sup>2</sup> 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.

<sup>3</sup> CdR 353/2010, CoR Opinion on Smart Regulation.

Adapting this approach to the territorial impact assessment, a few amendments would seem to be needed.

Firstly, consultation of the CoR on assessment of territorial policies (in the broadest possible meaning) should be compulsory, particularly as regards the methodological aspects of the assessment. For example, consideration could be given to applying the REGPEX model to the territorial impact assessment, as has already been done for the consultation on the Europe 2020 objectives. Secondly, efforts should be directed towards establishing a network (along the lines of the Subsidiarity monitoring network) of territorial bodies on sectoral policies subject to the impact assessment. However, this should be done in a structured fashion, setting up a specific model:

- the CoR holds a dialogue with the Commission on the assessment method;
- thematic and sectoral monitoring networks cut to the heart of the issues to be tackled by the assessment. Using this model would allow for a more effective multi-level approach to analysing territorial policies.

It could also be useful to involve the Impact Assessment Board (IAB) as a special partner (albeit more independent of the Commission) in the territorial impact assessment, as stressed in the CoR opinion on COM(2010) 543 – Smart Regulation in the European Union.

In order to have a clear picture of territorial needs and requirements, the regions should try to involve smaller territorial bodies as much as possible, so as to forward proposals with a broader basis of support to the CoR and the networks. Furthermore, attention should be drawn to the case for promoting cooperation with research and cultural institutes in order to enrich the capacity, instruments and approaches for analysing and preparing development and integration strategies. The region of Umbria has launched a cooperation agreement with the University of Perugia's institutions and society department, with the aim of fine tuning more effective methods for boosting the rate of active, informed participation in European decision-making processes (early phase) and playing a more systematic, integrated role in the implementation phase of Community policies.

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?**

Regional disparities within the EU are obvious. Most Member States now agree on the need to pursue territorial, social and economic cohesion. The policy cycle launched with Europe 2020 has already built in the need to give European action, in all forms and phases (from planning to implementation), a stronger territorial dimension. A territorial dimension of policies improves the response capacity because fundamentally there is a greater understanding of the needs of both the people and the territory.

This is why a stronger territorial dimension is necessary right from the planning stage of policies. Applying a territorial impact assessment to planning documents such as the Annual Growth Survey could be a step in this direction.

As regards the involvement of the Member States in the process of territorial impact assessment, in our view there is a dual danger:

- 1) this could be a prelude to the introduction of an inter-governmental decision-making dynamic;
- 2) assessments carried out at Member-State level could iron out the territorial impact which differs from one part of that Member State to another. We are therefore not convinced that involving Member States in the territorial impact assessment would be useful or appropriate, partly owing to the following points:
  - a) Member States can anyway, when they deem it useful, use their sovereign prerogatives to initiate such processes (through the conference system);
  - b) Member States already have a role to play in Community decision-making processes.