



*Brussels, 31.7.2017  
C(2017) 5521 final*

*Ms Malu DREYER  
President of the Bundesrat  
Leipziger Straße 3 - 4  
D – 10117 BERLIN*

*Dear President,*

*The Commission would like to thank the Bundesrat for its Opinion on the proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1059/2003 as regards the territorial typologies (Tercet) {COM(2016) 788 final}.*

*The proposal aims to update Regulation (EC) No 1059/2003 on the establishment of a common classification of territorial units for statistics (NUTS)<sup>1</sup> by adding a number of territorial typologies. This would lead to a harmonisation intended to improve the comparability and stability of the typologies with the objective of having a positive impact on the compilation and dissemination of European regional statistics.*

*A number of bodies involved in the European Statistical System, such as the responsible working group, the directors group (Directors of Sectorial and Environmental Statistics and Accounts - DIMESA) and the European Statistical System Committee (ESSC) were extensively consulted on the initiative and provided valuable input. The European Statistical System Committee is composed of experts from all Member States, including from Germany.*

*As the Bundesrat observes, the initiative is aimed at improving the analytical capabilities of the European Statistical System in cohesion policy.*

*The Bundesrat raises concerns that the proposal would have a significant impact on European Union cohesion funding, and that it does not deal sufficiently with critical issues like medium- and long-term impacts on funding and spatial planning.*

*The purpose of the typologies is exclusively of statistical and analytical nature, so that effects on funding and spatial planning are not expected.*

*The Working Party on Statistics of the Council raised similar concerns during its meetings in March and May 2017. The Presidency suggested clarifications on the purpose of the typologies being of purely statistical and analytical nature, and on the non-binding quality of the typologies in the national context.*

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<sup>1</sup> OJ L 154, 21.6.2003, p. 1–41.

*Concerning the Bundesrat's opinion that population density is not a sufficient criterion to mirror the different geographical and structural circumstances in the regions, the Commission would like to point out that the typologies have already been produced for a number of years now. The Commission can assure the Bundesrat that the methodology leads to reliable results in a large majority of cases. Where this was not the case, the Commission always agreed with the Member States on the assignment of types. It is planned to introduce a phrase that the Commission and the Member States could take geographical, socioeconomic, historical, cultural and environmental circumstances into account in the future implementing regulation governing the uniform conditions for implementing the typologies. The Council Working Party suggested including this phrase as well in the basic act.*

*Finally, the Bundesrat states that the proposal would lead to additional data collection and hence additional burden, which might become significant. There are no new data collections envisaged in the framework of Tercet. The Commission would make use of data that already exists, which can be aggregated by typology as is already the case<sup>2</sup>.*

*The Commission hopes that these comments address the concerns raised by the Bundesrat and looks forward to continuing our political dialogue in the future.*

*Yours faithfully,*

*Julian King  
Member of the Commission*

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<sup>2</sup> see for instance <http://ec.europa.eu/eurostat/cache/RCI/#?vis=degurb.gen&lang=en>.