



## EUROPEAN COMMISSION

Brussels, 26.9.2013  
C(2013) 5722 final

*Dear President,*

*The Commission would like to thank the Congreso de los Diputados and the Senado for their Opinion on the Commission Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 691/2011 on European environmental economic accounts {COM(2013) 247 final}.*

*The Commission welcomes the fact that the Congreso de los Diputados and the Senado find that the above Commission Proposal complies with the principle of subsidiarity. Nevertheless, the Congreso de los Diputados and the Senado made comments on the principle of proportionality, in particular as regards the justification for the compliance with this principle.*

*The Commission notes that Regulation (EU) No 691/2011 on European environmental economic accounts was adopted on 6 July 2011. It covers three modules: air emissions accounts, environmentally related taxes by economic activity, and economy-wide material flow accounts.*

*At the time of the adoption, it was stressed that this was only a beginning for European environmental accounting. Thus, Article 10 of Regulation (EU) No 691/2011 invites the Commission to report, by 31 December 2013, on the implementation of this Regulation to the European Parliament and the Council and, if appropriate, to propose the introduction of new environmental economic accounts modules, such as Environmental Protection Expenditure and Revenues (EPER)/Environmental Protection Expenditure Accounts (EPEA), Environmental Goods and Services Sector (EGSS) and Energy Accounts, if appropriate accompanied by proposals for new modules. However, as described below, the progress in developing the concepts and gaining the necessary experience to test these three new modules in a large number of Member States has been such that it was deemed appropriate to start the process already in the first half of 2013.*

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*The first three of the new modules listed in Article 10 are covered by the proposal amending Regulation (EU) No 691/2011 on European environmental economic accounts: environmental protection expenditure, environmental goods and services sector and physical energy flow accounts.*

*Users put much emphasis on the analysis and applications of environmental accounts in modelling and outlooks, both for preparing policy proposals and reporting on policy implementation and impacts. The new modules will allow expanding the integrated datasets available for such applications and analysis and are highly relevant to EU policies of resource, in particular energy efficiency, green growth and sustainable development.*

*Article 4 of Regulation (EU) No 691/2011 on European environmental economic accounts foresees pilot studies to be carried out by Member States on a voluntary basis to test the feasibility of introducing new modules. Such pilot studies, financed partially by the Commission, have been completed by many countries and all clearly demonstrate the feasibility of the three new modules. In addition, the Commission has produced compilation guides and provided training courses to help countries in implementing the new modules efficiently but also in a consistent and comparable manner.*

*During the period 2011-2012, Eurostat worked with the national statistical offices in working groups and Directors groups to prepare the three new modules. They were finally approved by the European Statistical System Committee (comprising Director-Generals of all the national statistical institutes) on 7 February 2013.*

*Environmental accountants mainly use existing data for compiling the accounts. Very little new data collection is necessary for implementing the new modules. Instead, environmental accountants make better use of information already collected in existing statistical or administrative data collections to add value to the basic data and to enhance the analytical possibilities of the data by linking environmental data to the economic data in the national accounts. The amount of extra work within a national statistical institute has been estimated at about 4 to 6 person months for each of the new modules. These estimates are based on information from countries that already produce one or more of the new modules. More human resources may be needed when national users want information that goes beyond the basic requirements of the proposed amendments to Regulation (EU) No 691/2011 on European environmental economic accounts.*

*In conclusion, the data is highly demanded by policy-makers, there is no, or negligible, extra response burden placed on companies and the staff resources needed in national statistical institutes is estimated as less than two full-time people for the three new modules combined. Consequently, the Commission considers that the principle of proportionality is fully respected. The Commission hopes that these clarifications address the concerns raised by the Congreso de los Diputados and the Senado and looks forward to continuing our political dialogue in the future.*

*Yours faithfully,*

*Maroš Šefčovič  
Vice-President*