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CRITICAL ANALYSIS
of the
European Commission (DG Regio) Working Paper on
Territories with Specific Geographical Features (02/2009)

“There are two ways of obtaining an average temperature of 37.2°C. You can either take your temperature with a thermometer or you can put your head in the oven and feet in the freezer and then ask a statistician where the 37.2° midpoint is.”

INTRODUCTION

Whatever reservations one might have about the working paper published by the European Commission's DG Regio devoted to statistical data on **territories with specific geographical features**, or whatever criticisms one might have, the mere fact that it exists should be considered in a positive light. Until relatively recently, there were considerable gaps in EU statistical analysis, particularly regarding territories described as having "specific features", whose specific circumstances have long been purely and simply ignored.

To illustrate this situation, which goes back a long way, we will refer to the resolution adopted by island regional authorities in 1989 at the annual conference of the CPMR Islands Commission in the Azores [see Appendix 1]. This noted that even the situation of relatively large regions, such as the French overseas departments (the "DOM"), Madeira, the Azores and several Greek islands, was "little or even not at all" mentioned in statistical data published by the EU. So praise is due for the extensive work done over the last 20 years by Eurostat,¹ and sometimes also by DG Regio,² and occasionally the island regions themselves,³ to which the Working Paper on **Territories with Specific Geographical Features** seems to be the latest addition.

Which territories are they?

The remit of this study seems to have been determined by the terms of Article 174 of the Consolidated Treaty as drafted for the Lisbon Treaty [see Appendix 2]. This stipulates that, with regard to action for disadvantaged regions, "*particular attention shall be paid to ... regions which suffer from severe and permanent natural or demographic handicaps such as the northernmost regions with very low population density and island, cross-border and mountain regions.*"

There are two ambiguous points here. Firstly, the text of Article 174, which seems to have been drafted rather hastily, has, for politically expedient reasons, included border regions in the list of regions suffering "*severe and permanent natural demographic handicaps*", even though borders are evidently created as a result of human intervention and not brought about by nature.⁴ The distinction is important, because, while humans can rapidly remove a border and in the end eliminate its effects, it is, except in rare cases, totally impossible to flatten a mountain or join an island to the continent. Without seeking to deny the existence of specific problems in border regions, the phenomenon cannot be described as being "*severe and permanent*" in the same way as insularity, mountain environments, and even desertification due to extreme climate conditions.

Secondly, Article 174 of the Treaty very clearly uses the expression "*severe and permanent natural or demographic handicaps*", which is totally unambiguous (even though its applicability to all situations could be contested). This terminology is still completely absent from the Commission's working paper, which has nevertheless been produced in accordance with the provisions of this the Treaty (though it had not been ratified at that stage). The study just refers to "*specific geographical features*" and carefully avoids talking about any sort of "handicaps", thus suggesting a desire to reduce the scope of the provisions of Article 174 as much as possible.

This remark is even more relevant to the case of the outermost regions, which are curiously included in the scope of this study though, since the Treaty of Amsterdam, those regions have their own Treaty article, due to the specific complexity of their situations which cannot be equated to mere "particular

¹ For example, the publication of the book "Portrait of the Islands" in 1994.

² The funding of a series of statistical studies on the situation of island, outermost and mountain regions in 2003. Various studies are also underway in the framework of ESPON.

³ Among other things, the work of the Eurisles Network, with the support of various national and regional statistical offices, in the Recite Programme. See also the paper "Off the Coast of Europe" produced by the CPMR Islands Commission.

⁴ Although the two factors may mutually strengthen each other, in cases where a strip of sea or mountain range marks the separation between the territories of two or more states.

characteristics". Their classification in a document focusing on territories with "particular characteristics" is meaningless, and conflicting with the spirit of the Lisbon Treaty which confirmed the differences of these territories with the outermost regions through dedicating separate articles to them. The part focusing on the outermost regions in this working document of the Commission is thus beside the point, and the references to the outermost regions in this paper are there only to "caricature" the results of the methodology used by the authors of the document.

We can now deal with the main content of the paper by setting out two types of criticism:

- 1) The analysis of specific territories⁵ is limited by persistent gaps in EU statistical analysis.
- 2) The analysis is not based on the objective reality of the territories examined, but has been conducted from the point of view of current EU legislation.

We shall examine the exact scope and utility of this working paper, and the way it might influence the preparation of future EU policies, particularly future cohesion policy.

1°) ANALYSIS OF SPECIFIC TERRITORIES IS LIMITED BY PERSISTENT GAPS IN EU STATISTICAL ANALYSIS

Faced with the limits of the EU statistical system, the working paper has adopted an approach based on the highest common denominator, namely the NUTS III statistical level. Although this is clearly a pragmatic approach, it is also very simplistic.

We should remember that for a very long time it was extremely difficult to obtain statistical data on territories described as "specific", even at NUTS II level. Furthermore, the fact that some figures are now available at NUTS III level undeniably constitutes a step forward. It is easy to understand the technical reasons that led the author of the paper to use this level of the nomenclature, because much economic and social data would have no longer been available at a more detailed level. It was therefore necessary to strike a satisfactory compromise between the need to come down to a statistical level that "fitted" territories as best as possible, and the need to find comparable data at EU level, and even quite simply to find any data at all.

There is an inherent contradiction in the NUTS definition. On one hand, EU statistical analysis cannot increase the number of statistical territorial units *ad infinitum*, and it thus requires that they have a minimal size (between 150,000 and 800,000 inhabitants for NUTS III level). On the other hand, territories' specific geographical, historical or administrative characteristics are unrelated to maximum levels of population.⁶ This contradiction can only be resolved politically and it is furthermore significant that in 2003, under pressure from the European Parliament, EU legislation on statistical classifications finally included a reference to the specific situation of islands and outermost regions.⁷

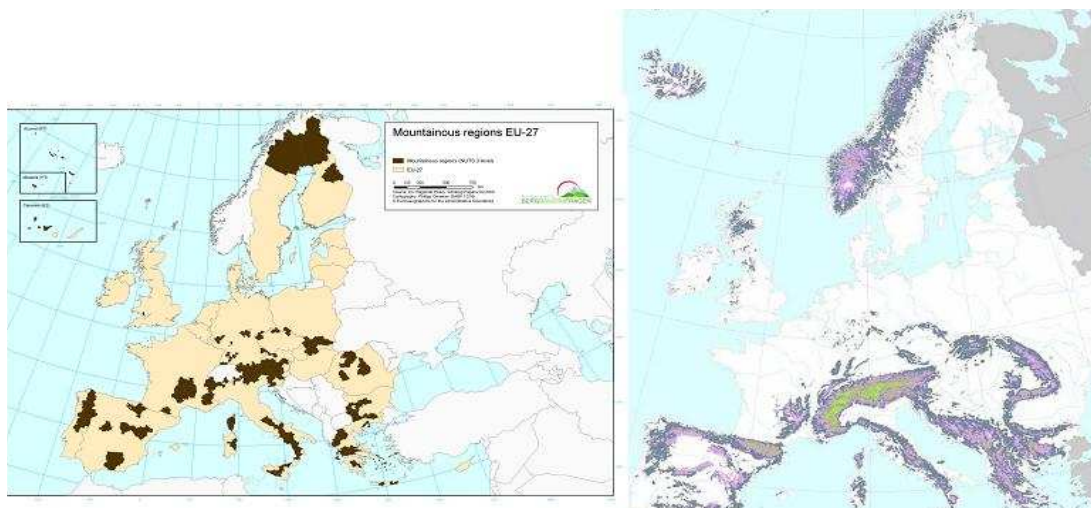
⁵ To adopt, with the reservations mentioned, the expression used by the Commission.

⁶ An example is the Åland Islands, an autonomous region in Finland, whose status is guaranteed by an international agreement. Because of their autonomy, the islands are classified as a fully-fledged NUTS II region, even though they only have a population of about 25,000. Åland thus inevitably has one of the highest per capita GDPs in the EU, which is baffling, as this sort of indicator is normally used for assessing a country's productivity, and there is a high risk of distortion when it is applied at such a small scale.

⁷ Regulation (EC) No 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS), Article 3(2): "In accordance with the regulatory procedure referred to in Article 7(2), individual non-administrative units may however deviate from these thresholds because of particular geographical, socio-economic, historical, cultural or environmental circumstances, especially in the islands and the outermost regions."

In the specific case of the Commission's working paper, the decision to use NUTS III level is understandable because of the lack of immediately available alternatives. This has nonetheless generated a whole range of problems, for example:

- The paper uses the NUTS III level as the unit of reference, and attributes a given geographical feature to it only if it is of a dominant nature (for example, over 50% of the population must live in mountain areas if it is to be classified as mountainous, the entirety of the statistical unit must be insular if it be classified as an island, etc.). Even though this is a rational method, it still eliminates several territories which are undeniably mountainous or insular, just because they are incorporated within a wider NUTS III region.
- The repercussions of the methodology used are particularly spectacular for mountain areas. The exclusion of all NUTS III areas with less than 50% of their population living in an area considered as being topographically mountainous purely and simply eliminates a substantial proportion of European mountain ranges. A glance at the map of NUTS III areas considered as being mountainous according to these criteria shows, for example, that much of the Alps, the Abruzzo mountains, or the Pyrenees have quite simply disappeared. For a more detailed analysis on the issue of mountain territories, please refer to the **note** (see appendix) **focusing on these territories, drawn up by AEM (European Association of Elected Representatives from Mountain Regions) and validated by Euromontana.** [Voir Appendix 3].

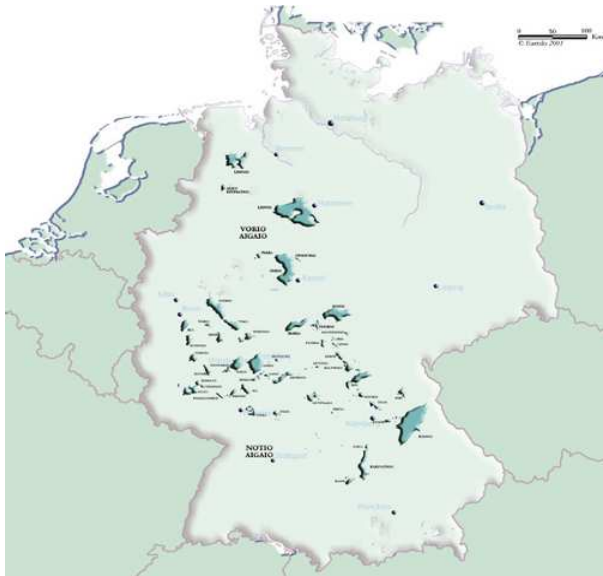


ON THE LEFT: Nuts III « mountainous areas » as defined in the commission's working paper.

ON THE RIGHT: European mountainous areas as viewed by a UN (Unep) Map.

- Similarly, regarding islands, several thousand coastal islands off Sweden, Finland, Estonia, Denmark, Holland, Scotland, Ireland, Brittany, Italy and Greece and so on have thus been eliminated. All these islands are evidently part of the continental NUTS III areas and no longer appear. Their overall population is of course very small at national and EU level, but these people are no less affected by the constraints of insularity, which are exacerbated by the micro-insularity phenomenon.

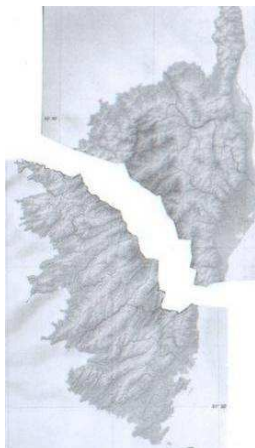
- In the same vein, regarding archipelagos, individual islands have been eliminated (except in the case of the biggest archipelagos, such as the Canaries or the Balearic Islands). However, the issue of “double insularity” in archipelagos should not be dismissed. This is clearly an aggravating factor in terms of communication, access to services and market size.



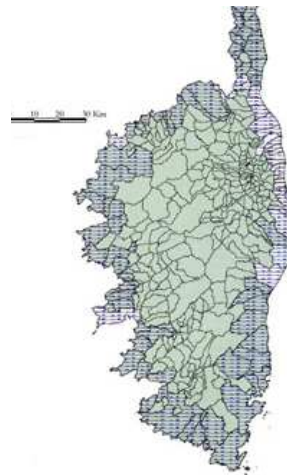
ARCIPELAGIC REALITY:

The Aegean Islands (5 NUTS III areas), with less than 500,000 inhabitants, cover an area similar to than of Germany from North to South, with its 80 million people.

- Paradoxically, the use of the NUTS III level leads to an artificial increase in the number of islands making up homogenous groupings. The paper thus shows that there are 56 island regions in Europe (in fact 56 NUTS III areas located in islands) while in fact the EU only has 24 island regional authorities and three island states. To cite just one example, Corsica, which is subdivided into two NUTS III areas (Haute-Corse and Corse du Sud), is thus “deconstructed” into two islands, irrespective of the geographical reality. In the case of this region, it would no doubt have been more appropriate to adopt a territorial approach that differentiates the largely deserted mountain area in the island’s interior from the coast, where the main cities and the majority of the population and economic activities are located.



Corsica is artificially deconstructed into two NUTSIII areas



The reality of Corsica: a mountainous island, will costal and mountainous municipalities.

These examples clearly demonstrate that the NUTS classification as it is currently used is a very imperfect and even unsatisfactory tool for understanding the situation of these territories.

Furthermore, one of the apparent objectives of this study was to undertake a cross-analysis of the impact of diverse geographical characteristics (for example the situation of mountain areas or sparsely-populated mountain areas, etc.), but the result is most disappointing because of the absence of a more detailed and better adapted statistical level of analysis. It is ultimately difficult to assess the combined or intensified influences of several geographical characteristics when a substantial part of the territories is not taken into consideration or cannot be distinguished from the outset.

More broadly, we will also examine the utility of undertaking comparisons, and above all of determining statistical averages, by including in the same category territories which may share a particular characteristic but are otherwise totally different and unrelated. For example, what is the point of asserting that the population of territories with a low population density has slightly increased when this is based on the average between Amazonian Guyana (where the population is growing) and Lapland (where the number of inhabitants is on the decrease). A superficial analysis of this average might lead one to conclude that the situation of territories with a low population density is improving, whereas both Guyana and northern Scandinavia are facing difficulties that require very different remedies.

2°) THE ANALYSIS IS NOT BASED ON THE OBJECTIVE REALITY OF THE TERRITORIES EXAMINED BUT HAS BEEN CONDUCTED FROM THE POINT OF VIEW OF CURRENT EU LEGISLATION.

We have seen that the use of the NUTS III level has automatically removed a large proportion of mountain areas, all coastal islands and the majority of individual archipelago islands from the analysis of territories with specific geographical features. Perhaps this is justifiable because no better instruments existed and necessity determined the rules. However, this argument can scarcely be used in other aspects of study, where the definitions selected are not founded on the real situation of these territories, but on certain provisions within EU policies.

This is the case for border regions defined as NUTS III areas which are eligible for cross-border cooperation programmes under the ERDF Regulation. This corresponds to all of the Union's internal land borders and some of its external borders. For maritime borders, only regions where the border is less than 150km away are taken into account. Regions neighbouring EFTA member countries or those covered by the ENPI and IPA instruments are also concerned.

The result is rather extraordinary, and some of the most spectacular examples are cited below. In the Mediterranean, the application of this rule means that archipelagos such as the Balearic Islands are not considered as either internal or external EU borders or even maritime borders (the same applies to the Palermo area in Sicily) ... which will certainly surprise anybody who has even a basic knowledge of the history and geography of the Mediterranean area. In the north of Europe, the same thing applies to the Orkneys, Shetland and Outer Hebrides archipelagos, which would certainly have surprised the Vikings, who used these islands in their conquest of the Atlantic and Europe's western fringe from as early as the ninth century.

The case of the outermost regions is even more extraordinary. While the Commission's working paper concedes that Fuerteventura, Gran Canaria and Lanzarote in the Canary Islands are clearly EU external borders, they are the only outermost regions to be given this privilege, presumably due to the Sahara sand storms that reach their shores. However, this classification does not apply to the rest of the archipelago, or to Madeira and the Azores, which can no doubt put the fact that they are not borders at all, even maritime borders (something of which King Henry the Navigator of Portugal was clearly unaware), down to their noteworthy isolation in the middle of the Atlantic. The top prize goes to the French overseas regions, because none of the DOMs (the island of La Réunion in the middle of the Indian Ocean or Guyana between Brazil and Surinam) are considered as EU external borders,

whereas they are all quite extraordinarily labelled as being “internal borders” (but might this just be a word-processing error?).⁸

Such bizarre statements make it easy to lampoon the paper. They nevertheless raise an extremely serious problem: can one accept that territorial realities are assessed by the yardstick of provisions drawn from EU regulations, even though this results in manifestly false assertions? Would it not be better, yet again, to use more suitable definitions or criteria?

This intention is clearly present in the working paper, and it should be emphasised that a positive effort is made to grasp the nature and intensity of certain territorial features that are very characteristic of the territories studied, such as their environment and degree of accessibility. Not having the methodology or data that have been used to draw up such indicators, we will refrain from criticising them here. Nevertheless, one might ask whether these indicators have really taken local realities into account? Is it understood that it is difficult to measure the accessibility of a service just using the distance in kilometres? A mountain road is not same thing as a motorway on the plain, and leaving minor islands to go to hospital, a university or an airport can be much more time-consuming and difficult than just crossing a bridge. While it is true that the indicators used refer to a time “over” 30, 60 or 90 minutes, for some territories the difference can be measured in several hours and even days.

This caution is justified by the fact that most studies on the accessibility of territories take little or no account of the impact of insularity: the total absence of road and rail links, the overdependence on air transport, and the prevalence of maritime transport which operates in conditions that can in no way be compared to road transport (in terms of frequency, waiting times for loading and unloading, etc). In the case of outermost regions, air transport is essential, especially for passenger transport outside the region. In such a context, a comparison based for example on a weighted index combining road, rail and air traffic data serves no purpose.



APPARENT AND REAL DISTANCES:

Statistical indicators must reflect the fact that distance in kilometres is not akin to remoteness. This map reflects the real crossing time to a selection of islands (waiting time, loading and unloading, navigation...) and reposition them in relation to a symbolic point located in the EU centre (here, Maastricht).

⁸ Although this assertion can nevertheless be fairly (and probably unintentionally) made in the case of the island of Saint Martin in the Guadeloupe archipelago, which has a French zone and a Dutch zone.

CONCLUSIONS:

THE NEED FOR A TERRITORIAL APPROACH TO TERRITORIAL ISSUES, AND A SPECIFIC APPROACH FOR TERRITORIES WITH SPECIFIC FEATURES

The Commission's working paper concludes that:

"The main implication of such observations is that the categories of specific territories are far from constituting homogenous groups of regions. Moreover, for regions facing difficulties, the disadvantage syndrome is generally made up of several types of constraints which are not systematically the same within a given category of territory. It follows that it is difficult to use such categories as a reference for setting up specific regional development programmes. In fact, such an approach is likely to be ineffective. The wide range of differing situations and performances within each category instead calls for a case by case approach where policy interventions are specific to the local context rather than to a given type of territory."

Firstly, there was absolutely no need for a study just to learn that there are extremely varied situations in given categories of territories: Guyana is not Lapland, Ushant is not Sicily, and the hills of the Highlands are not the high peaks of the Alps, and so on. However, is the purpose to establish balanced classifications of homogenous groups needing standard policies? Or is it not, on the contrary, to acknowledge the diversity of European territories, including in its extremes, and to understand the need for a flexible approach on this issue within EU policies.

The paper's conclusions are correct when they state the need for a "case by case" approach, but they are extremely contentious when they deny the utility of specific development programmes. But perhaps an effort should be made to avoid interpreting the term "specific development programme", which is used in a negative manner in this paper, as the implementation of a single and same policy for all specific territories, or each category of specific territories. This would effectively mean denying the diversity of their problems and thus prevent the development of appropriate solutions.

So it would no doubt be best to replace the term "specific development programme" with "specific framework", in other words the creation of a framework (legal, political, financial) permitting EU policies to intervene in these territories with all the flexibility they need in order to respond on a case by case basis to their strengths and difficulties and enable them to exploit their opportunities in the best way possible.

This approach can evidently not be used independently from the principle of proportionality, and the key question in the debate on territorial cohesion, and more specifically in the approach to be adopted for "specific" territories is: how far can one go when implementing the principle of flexibility? Up to what point can derogations be made? The answer to these questions is fundamentally political, but it must be based on certain criteria. Which ones? This is where the nature and degree of detail of the indicators used for assessing specific territorial features become very important.

The Commission's working paper shows that, even in a document on territories with specific geographical features, the use of genuinely territorial indicators such as accessibility or the environment is rare. Yet again, emphasis is given to analysis using traditional indicators such as per capita GDP or unemployment levels, which are respectively in the economic and social field. Paradoxically, the implementation of territorial cohesion, which is newcomer to EU policies in comparison to economic cohesion and social cohesion, must continue to use the same indicators, rather than develop its own evaluation criteria. It is scarcely surprising that people start talking at cross purposes: some people talk about accessibility and vulnerability, while others respond by talking about unemployment and GDP.

All this suggests the need for a complete overhaul of the way the situation of these territories is dealt with.

Is it at all costs necessary to seek to compare their situation to that of the rest of the EU if, in doing so, we have to use instruments which ignore or distort their realities.

Now the Treaty acknowledges the existence of "*territories with specific features*" (not to mention "*territories with severe and permanent natural demographic handicaps*", as well as the outermost regions), should the statistical system not itself be adapted to them, or at least permit different approaches?

So, instead of having a European comparison that is of limited use because it is based on simplified indicators or frameworks, should priority not be given to an approach based on specific indicators and on functional areas?

The questions raised here are clearly of the greatest importance for territories with the most pronounced specific geographical or demographic features, and, as Article 174 of the Treaty recommends, they should be given "specific attention". However this in no way excludes the adoption of the same sort of approach for other EU territories, such as peripheral or coastal areas for example.

APPENDIX 1

Resolution adopted unanimously by the Annual Conference of the CPMR Islands Commission, held in the Azores on 19 May 1989

ON THE RECKONING OF THE ISLANDS DIMENSION BY COMMUNITY STATISTICS

Being aware of the importance of statistical data in the framing of Community policies, the island regions of the EEC wish to express their concern about the existing statistical approach to their problems.

1°) They are, firstly, concerned that, for one reason or another, many of them are either little or even not at all mentioned in statistics published by the Community. Such is the case with the French D.O.M., Madeira, the Azores, the Scottish archipelagos or numerous Greek islands. Such is the case, even more so, with the smaller coastal island communities because there often accurate difficulties are hidden by their integration to neighbouring mainland units.

Such a situation is prejudicial to the individual situation of the European islands, but is also detrimental to the efforts, which are being undertaken to achieve a global understanding of the situation of the islands, and of their capacity to integrate in the Single European Market.

Consequently, the European Island regions ask the EEC Commission to extend, as soon as possible, its publication of statistical data to all the aforementioned regions.

2°) Moreover, the island regional authorities notice that when data is published, it reflects often poorly their special position within the Community

- either because data which has been processed at national or at Community level becomes - through unavoidable technical readjustments - too imprecise to describe their true condition without distorting it;

- or because the statistical measurements which could illustrate their unique socioeconomic situations have not been created, or not been used.

Consequently, the island regions wish to ask the Commission's appropriate services and Statistic National Institutes to collaborate with them on the following programme:

- to study the means of improving Community, National and Regional Statistics on Island Regions;

- to study which specific statistical measurements would enable a satisfactory understanding of the islands socio-economic conditions, and allow a following of their evolution;

- to set up a specific statistical programme which shows the priority action fields and the necessary resources.



APPENDIX II

Article 174
(ex Article 158 TEC)

In order to promote its overall harmonious development, the Union shall develop and pursue its actions leading to the strengthening of its economic, social and territorial cohesion.

In particular, the Union shall aim at reducing disparities between the levels of development of the various regions and the backwardness of the least favoured regions.

Among the regions concerned, particular attention shall be paid to rural areas, areas affected by industrial transition, and regions which suffer from severe and permanent natural or demographic handicaps such as the northernmost regions with very low population density and island, cross-border and mountain regions.

APPENDIX 3

THE SITUATION OF MOUNTAIN TERRITORIES

AEM's Contribution

CRITICAL ANALYSIS

on the Working Paper of the European Commission (DG Regio) on Territories with Specific Geographical Features (02/2009)

Is the choice of the NUTS 3 level relevant?

Regarding mountain regions, the matter of delimitation is not a relevant problem. There are more appropriate paths which can contribute to adoption of a more adequate and comprehensive scheme. Instead of using the NUTS 3 level, as it is done in the Working paper, AEM suggests to use the NUTS 5 level to consider mountain regions. DG Regio could also refer to other EU related papers and develop a more appropriate model. Concretely, we can propose three of them:

- Since the Directive 75/ 268, an **upland zoning** has been used to consider less favored areas , in the framework of the Common Agricultural Policy (CAP). More precisely, this zoning was designed to determinate eligible zones for Compensatory Allowances for Natural Handicaps (CANH), according to the transposition of the directive into the French law.

This measure is currently being reformed (in the framework of the Rural Development Policy 2007 – 2013). It reinforces a strict delimitation of mountain territories. According to this framework, a major part of EU Member States (or Regional Authorities) could define their mountain orientated public policies.

The zoning has been based on geo topographical indicators (slope and altitude) and leans on two main classification levels: NUTS 5 level (municipalities) and “agricultural field” level. This classification exists in all Member State.

- Moreover, DG Regio has asked the Nordregio Institute for a study on mountain areas in Europe, in January 2004 (appendix 1 of the working paper in the “topographic definition” section). Several positive and negative regards of the Nordregio study have largely been discussed, especially the overemphasis on the climatic criteria regarding the topographical indicators. However, **it is important to underline that this study provided a list of mountain municipalities (NUTS 5) according to this large delimitation.** (because of the emphasis on the climatic criteria recommended by DG Regio, the study defined sparsely populated Scandinavian territories as mountain regions).

Nordregio’s study help us to understand better realities of mountain ranges (massifs)and their diversity.

- Finally, the European Environment Agency (EEA) is prepares a study on land use in mountain regions⁹. It is supposed to deliver additional information on the territory’s reality. There are other similar on-going studies, including ESPON’s study on territorial diversity.

⁹ 'Integrated assessment of Europe's mountain areas', EEA, to be delivered in June 2010.

These three leads demonstrate how the mountain classification proposed by the working paper is problematic and paradoxical. The attempt of DG Regio to provide a general delimitation makes disappear specificities of each mountain region which are so important in order to achieve the “territorial cohesion objective”. This “special delimitation” of mountain territories has an even worse collateral damage: it erases a half of EU mountain regions! The leads previously listed prove that **the European Commission has already existing tools far more adequate than the one used in the Working paper.**

Moreover, previous leads are based on more local statistic indicators, notably using the NUTS 5 level.

Certainly, it was necessary to find a balance between an appropriate statistic level, well adapted to territories, and to find similar features at European level. Nevertheless, it is necessary to have precise geographical information and indicators at European level. In fact, this is a real weakness of European institutions: DG Regio should consider that the topography of European mountains and islands have not been significantly modified since 2004. As a consequence, 2003 and 2004 previously quoted study is still highly relevant in today’s debate, at a geographical level.

A paradoxal use of non relevant criteria to define political attention

Additionally to the debate on indicators (NUTS 3 or NUTS 5), the Working paper introduces a demographical criteria (social cohesion) which is arbitrary and questionable. It blurs any attempt of coherent and operational reading. **This mix of demographical and geographical indicators is particularly irrelevant when it comes to identify the specific stakes regarding EU mountain regions.**

The omission of NUTS 3 entities with less than 50% of the population living in the area topographically considered as mountainous simply makes disappear a substantial part of EU mountain massifs. **A quick look at “NUTS 3 mountain areas” map shows that an important part of Alps, Abruzzos, Carpathians, Greece, Massif Central, Cantabrian Mountains, and Pyrenees simply disappears!**

Mountain habitants often move to close valleys or piedmont, in order to benefit from industries and particular know how developed in mountains, to access to commercial intersections or to benefit from transport connections. This concentration develops larger agglomerations and then makes disappear the mountain area from the classification! Even if mountain characteristics have a strong influence on their organization, economic activity, culture or environment.

This analysis also works for every NUTS 3 entity which has been developed in valleys (what is historically the case in several mountain ranges).

To sum up, there is a high amount of specific cases for which the classification proposed by the working paper does not fit. This proves a notable incoherence that would eventually lead to irrelevant public policies, since an important part of the EU specific territories would not be considered as such.

By ignoring an important part of the EU mountain regions, some of them have to face a **double negative effect. Mountain habitants that have most suffered from isolation and moved to piedmont or valleys are then not considered as being a part of mountain region anymore!**

A necessary adoption of new criteria: towards a “mountain massif” policy

Besides the proposition of irrelevant indicators, the Working paper fails to consider mountain territories properly by trying to consider them the same way as previous EU programs or European policies did. By doing so, **the DG Regio disregards important territorial links between mountain territories.**

More than 50% of border areas are mountain areas as well. We should not forget that during the last 150 years, European borders have notably changed and that European cooperation programs aim to blur the border effect and to consolidate the transnational character of territories. Therefore, **it is imperative to consider the strong organic links that shapes mountain territories**. Instead of considering them with inadequate indicators, the European Commission should privilege a specific approach based on topographic indicators in order to define better “territory- orientated” policies. The European Commission should also take into account macro-regional or intraregional cooperation.

Regarding mountain territories, AEM proposes an innovative European approach which is inspired by the French legislation and its “Mountain Law”(1985): **The “mountain massif” policy**. This law argues that *“mountain zone and its contiguous zones form a single geographical and economical entity, which constitutes a massif”*.

Such a perception is far more coherent and suitable. Mountain territories are not only *stricto sensu* mountain areas. There are fully linked to valleys and piedmont, especially on economic and administrative level. The “massif approach” offers a much more **subtle perception of the territorial cohesion in mountain regions**. By doing so, it is far more adequate than the classification adopted by DG Regio’s Working paper.

Mountain territories should not be considered apart from their natural and historical reality. A “massif territory” includes the links gathering both urban and rural dimensions, natural and zones, valleys and mountain, piedmont and massif.

AEM recommends the DG Regio to adopt a more locally – based classification (NUTS 5) to delimit European mountain regions. If valleys are historically, economically and naturally linked to piedmont and to their contiguous plains, all of them form a coherent territory (a “massif”) that must be listed as a single mountain territory in order to benefit from a coherent and adapted financial and legislative framework.

For example in Alps, we count 60 million habitants, if we consider valleys, towns and metropolitan areas, but it is reduced only to 15 to 20 million habitants following the Working paper. In this case, we can’t develop a macro-regional approach (i.e. macro regional strategy for the Alpine region). As a result, the alpine case is a perfect example to illustrate the debate on the appropriate level to use in European territories-orientated policies.

Conclusion:

According to our analysis, the classification adopted by the DG Regio Working paper turns out to be strongly inadequate for mountain territories. This analysis proposes more relevant leads and puts in the European Commission’s hands all the necessary tools in favor of innovative mountain - oriented territorial cohesion policy. Such an innovative policy would definitely be a new and major step towards territorial cohesion, based on multilevel governance principles.