

## CRITICAL ANALYSIS

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

#### *AEM's contribution*

In December 2009, DG REGIO published a Working paper on « Territories with specific geographical features » (02/2009). The document proposes an analysis on economic and social realities in specific territories in order to better identify the stakes that they have to face. This document is in line with the obligation of the European Commission to refer to relevant data and provide an adapted and efficient Cohesion Policy.

Nevertheless, the document proposes a delimitation of mountain territories that AEM finds strongly preoccupying. It leads to lack of coherency and inadapted conclusions. Indeed, it is necessary to underline that in the matter of mountain territories, the perception depends on various perspectives : geographic, economic and administrative.

#### *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 regions<sup>1</sup>. 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.

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

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<sup>1</sup> 'Integrated assessment of Europe's mountain areas', EEA, to be delivered in June 2010.

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).

#### *A few examples of disappearances*

France: in region Rhône-Alpes (France), the department of Ain is not considered by the working paper as a mountain territory, despite the fact that a half of its territory is located in a mountain area. The same conclusion for the French departments of Franche-Comté, Doubs, Jura or Alsace region where the Vosges range is not considered as a mountain.

Italy: Provinces of Torino and Cuneo (in the Piedmont region) are not considered as mountain regions. The whole Piedmont region isn't classified as a mountain region, even though 45% of its territory is mountainous. This is particularly incoherent, especially when the economic activity of Piedmont is based on mountains. Tourism is indeed possible thanks to the Alps (lakes, ski stations). More specifically, Piedmont industry is directly connected to the mountain know how and resources (hydroelectricity, wood). Agriculture is also important, especially vine growing and cheese making in the mountain area.

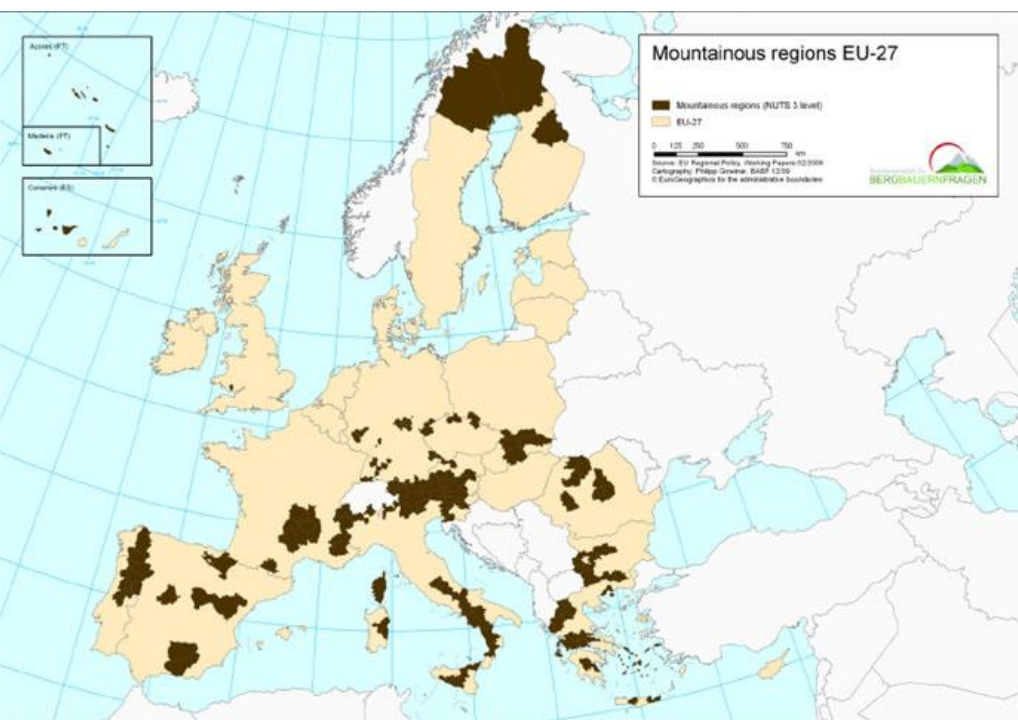
The same happens for Tuscany region (25% of its territory is mountainous), Lombardia and Central Italy (Abruzzos,).

Germany: Bayern and Bade Wurttemberg (the Allgäu region above all) are being strangely divided between east and west by the working paper.

To sum up, there is a high amount of specific cases in 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 EU mountain territories, 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!**



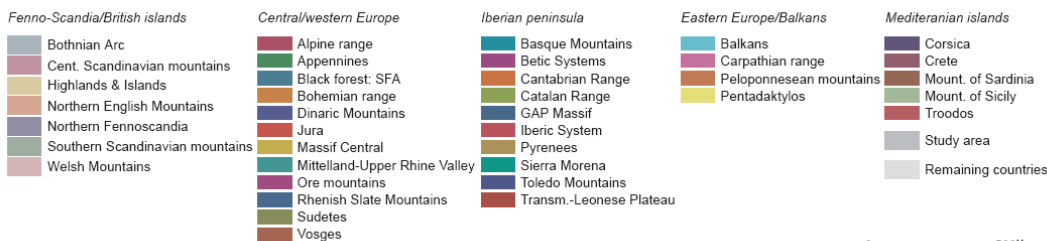
Perception differences of the mountainous Europe, according to the methodology implemented.

**On the left:** the map resulting from the NORDREGIO study, ordered by the European Commission in 2004. The aim was to identify European mountainous areas.

**On the right:** the map resulting from the classification adopted by DG REGIO in its Working paper.

**The difference of view is very significant: half of mountain regions aren't considered as such anymore.**

### Mountain ranges (level 1)



Delimitation of mountain areas produced by UNEP-WCMC and Nordregio  
Source: European Commission, DG REGIO, *Mountain areas in Europe* (Nordregio report 2004:1)

Administrative boundaries: EuroGeographics, ESRI Romania, NCRD, Oikos, Swiss Federal Statistical Office, Eurostat/GISCO

### *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.

***The example of the Alpine Arc:***

The Alpine Arc is a perfect example to illustrate the strong organic links that connect territories and transcend boundaries. There is an inner diversity proper to the Alps that goes beyond national, linguistic, economic or religious cleavages. Alpine people are confronted to the same issues, have to face the same constraints and have similar assets to valorise.

The massif approach permits us to consider the Alpine Arc as a whole. According to this perspective, the Alpine Arc has about 60 million inhabitants, who live in mountain areas, valleys and contingent metropolises. If only *mountain areas stricto sensu* are taken into account, the Alpine Arc has about 15 to 20 million inhabitants.

Moreover, the specificities of the Alpine Arc go far beyond the question of delimitation. The DG Regio should recognise that a major part of administrative perimeters related to local authorities is larger than mountain areas (they consists of the piedmont zones as well as the fluvial basins, for example). Similarly, DG Regio should recognise that there are numerous alpine actors that have been working together for years, on a multilevel basis. This is very characteristic for the Alpine identity. Furthermore, several organisations such as the Alpine Convention, Alpine networks (CIPRA, ALpac, etc.) and European initiatives such as the Alpine Space Programme have permitted to shape an authentic Alpine culture, based on cooperation and solidarity. The DG Regio's working paper goes in the opposite way and actually undermines the integration process that has been undertaken for years.

Instead of classifying European territories with obsolete indicators, the European Commission should reflect on a new approach for the future Cohesion policy (after 2013). The European Commission should use new concepts which take into account local integration, such as macro regional strategies (which are complementary to the massif approach).

**Conclusion : towards new vision of governance**

The classification proposed by the Working paper is not at all adapted to mountain territories. AEM proposes in this critical note some more relevant leads and proposes to the European Commission necessary tools to assess realities of the mountain territories, optimise the territorial cohesion objective and apply the multilevel governance principles.

A kind of cohesion and territorial solidarity exist already *de facto* in various European massifs. In this sense, implementation of the multilevel governance would involve all actors from various levels, within strategic and management structures, which would be responsible for adaptation of European strategies to macroregional levels, manage the operational coordination towards precise objectives, estimate constraints, possible natural permanent

handicaps, assets to valorise (following European objectives fixed by the European Parliament and European Council) and identify major political objectives of each territory.

***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.