

## CONSULTATION QUESTIONS

NUTS boundaries are used for reporting of regional statistics to Eurostat and those statistics are used to inform regional policy. The Scottish Government is proposing to make minimal changes beyond aligning existing NUTS boundaries to Local Authority Boundaries.

### **Do you have any comments on the Scottish Governments proposals for NUTS 2 regions?**

SE supports the proposal for continuation of a separate Highlands & Islands NUTS2 region. We do not feel it would be appropriate to combine the Highlands and Islands with North Eastern Scotland in order to create a larger NUTS 2 region.

It is important that the EU continues to recognise the characteristics and challenges of remote / sparsely populated rural areas and allow deviation from the indicative population thresholds to reflect this. In this respect we note that the rural areas of the south of Scotland also have particular challenges, including low GDP, which are masked by inclusion in the current large NUTS 2 regions.

While the consultation document states that no consideration will be given to potential future eligibility for Structural Funds / Assisted Area status, there is a point of principle that statistics are used for policy purposes, both at EU and national level, and the statistical units should therefore seek to reflect the social, economic and geographical characteristics of the regions in order for appropriate policy responses to be considered.

We do not wish to comment specifically on the Scottish Government proposals on changes to the NUT2 regions as the local Councils and Highlands and Islands Enterprise are better placed to do so.

### **Do you have any comments on the Scottish Governments proposals for NUTS 3 regions?**

We agree with the Scottish Government's position on the suggested merger of Moray and Argyll and Bute NUTS 3 areas. The merging of two very different areas separated by such a distance simply does not make sense and would render the statistics produced for this NUTS 3 area meaningless. We do not wish to make specific comment on the Scottish Government proposals for changes to NUTS 3 areas, as the local Councils and organisations are better placed to do so.

Eurostat have requested we consider merging the Highlands & Islands with North Eastern Scotland to create a new area that's closer to the recommended population

thresholds. The Scottish Government plan to request that these areas should be allowed an exemption under Article 3 (5) of the NUTS Regulations, i.e. because of particular geographical, socio-economic, historical, cultural or environmental circumstances, especially in the islands and the outermost regions.

**Please provide any evidence in favour of or against an exemption under Article 3 (5) of the NUTS Regulations for Highlands & Islands and North Eastern Scotland NUTS 2 areas?**

No specific evidence. The Highlands & Islands is a very distinct region, with its own administrative structures and characterised by low population density, remoteness, mountainous terrain and island communities, which result in specific social and economic challenges.

Eurostat have suggested that the Scottish Governments proposals for NUTS 3 should include merging Moray with Argyll & Bute Local Authority to create an area that meets their recommended population ranges.

**Please provide any evidence in favour of or against an exemption under Article 3 (5) of the NUTS Regulations for the proposed Moray and Argyll & Bute NUTS 3 areas?**

No specific evidence.