

Comment template for theme 'Administrative Units'

	1	2	(3)	4	5	(6)	(7)
Id ¹	Name	Chapter, section or clause no./ Subclause No./ Annex ²	Paragraph/ Figure/Table/Note ³	Type of comment ⁴	Comment (justification for change)	Proposed change ⁵	WG A observations on each comment submitted
1	IGN F	Tithe		E	Would be nice to have 'administrative units' on same line	To be corrected if possible	A
2	ESTAT	whole document		E	Different gray levels are used for the fonts. See for example in the executive summary. This is a bit confusing.	Use same font color everywhere.	<p>NA</p> <p>Same colour coding principle as in INSPIRE data specifications/</p> <p>What is clearer are the parts common to all core themes. What is darker are the parts specific to theme AU.</p>
3	ESTAT	whole document		G	<p>There are different mentions in the document on different types of audience to read this document. See for example: "This document has annexes containing more detailed explanations targeting the technical people who will be in charge of implementing or adapting core data recommendations (e.g. for production purpose, as source of other standards, etc.)."</p> <p>"senior administrators owning and leading the geospatial efforts in their respective countries"</p> <p>"The 'recommendation for content' document is meant for medium level decision makers. It is written in natural and not too technical language."</p>	Please clarify the type of profiles the document is supposed to target. We suggest to keep only too profiles: Low-level technical persons, which should read only the executive summary, and high-level technical persons, which should be concerned by the whole document	<p>NA</p> <p>It is part of common template so changing it now would introduce some heterogeneity between core data deliverables.</p> <p>This does not look relevant, for limited improvement: you may be right about potential readers but in fact no one knows who is going to read what.</p>

¹ For internal use only. Not to be completed by reviewers.

² Use "3.1" instead of "Clause 3.1" or "Chapter 6.1". This makes grouping of comments easier.

³ E.g., Table 1

⁴ Type of comment can be G (general), E (editorial), T (technical), or Q (question)

⁵ The proposed change must be as precise and concrete as possible.

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4	Sweden	General question			Could the maritime plans being implemented also be seen as a specific type of maritime unit as in Sweden e.g. they relate to a specific geographic area?		<p>Rather no.</p> <p>Maritime plans look more related to core theme "Managed or Regulated Areas".</p> <p>Sea administrative units are limited to the 5 categories of maritime units.</p>
5	Croatia	1	There are five types of maritime units (internal waters, territorial sea, contiguous zone, exclusive economic zone, continental shelf).	Q, G	Do you recommend for codification purposes a classification that will cover all mentioned categories? Classifications are very important for preparing administrative registers, collecting and processing data as well as for data dissemination. The classifications are also type of language and metadata that is needed either for administrative or statistical purposes. Maybe a little part of it's importance should be mentioned in Annex B under methodology.		<p>Types of maritime units have to be implemented according to the UNCLOS recommendations.</p> <p>Regarding classifications, WG A has just adopted the INSPIRE ones that looked quite relevant.</p>
6	DE-Adv	1	5th paragraph	G	Change the first sentence, because the INSPIRE attribute <i>residence of authority</i> is "voidable" (to this see the general comment to 2.3.2).	The land administrative units are generally organised in a hierarchical way; they should be provided with key attributes, such as geometry, identifier, name, national code, national order and if available residence of authority	<p>NA</p> <p>Core data aims to define priorities for the most useful information, even if it is voidable in INSPIRE.</p>
7	ESTAT	Executive summary + Core recommendation 3		GT	This statement is crucial for the success of the UNGGIM core data initiative: "The data should be provided at different levels of detail: large scale, medium scale or small scale."	Keep raising awareness on the need for multi-scale data in UNGGIM core specifications.	No action
8	ESTAT	2.1.2 Structure		E	The two first paragraphs on the executive summary and the foreground are not so informative.	It might be pertinent to remove these two paragraphs to lighten the reading.	<p>NA</p> <p>The "informative" characteristic depends if the reader is aware or not of the general context.</p> <p>In addition, it is part of common template for all core themes so changing it now would introduce some heterogeneity between core data deliverables.</p>

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9	ESTAT	2.2.1		GT	This statement is crucial for the success of the UNGGIM core data initiative: "INSPIRE specifications provide common data models that ensure a first step towards interoperability, however ensuring homogeneous content is outside their scope, as they contain no indication about levels of detail, very few recommendations about quality".	Keep raising awareness on the need for level of detail harmonisation in UNGGIM core specifications.	No action
10	DE-AdV	2.3.2	1st paragraph	G	For the Member States of the European Union it is essential and important that a world-wide AU data schema can be filled in accordance with the INSPIRE AU data schema (1:1), without additional data capture and schema extensions. That demand must be added in chapter 2.3.2 and in some more chapters (for example see the comments to 4.1.1, 4.3 7.1.1.4, 7.1.1.1 und 7.1.2). The AU data schema must be changed at all positions, where the AU data schema differs from the INSPIRE data schema (broadly speaking: use the entire INSPIRE data schema and formulate an optional world-wide add-on). Otherwise the document cannot be accepted by the Member States of the European Union.	Core data specifications are built upon INSPIRE data specifications: the core data specifications include the entire INSPIRE data schema and an optional world-wide add-on.	<p style="text-align: center;">NA</p> <p>Core data is about defining priorities for new production of data or for data enhancement.</p> <p>Core data content is widely based on INSPIRE data models but it may have extensions (some being considered as first priority) to include information considered as significant user requirements.</p>
11	DE-AdV		All notes	E	Work uniform within the document and write a capital letter at the beginning of the sentence (e.g. on Page 7)	NOTE: Some of these good practices may be quite ...	A
12	DE-AdV	3.1	1st paragraph	E	Complete the reference and work uniform in all documents. (see Core Spatial Data Theme Addresses)	Definition: Units of administration, dividing areas where Member States have and/or exercise jurisdictional rights, for local, regional and national governance, separated by administrative boundaries [INSPIRE Directive 2007/2/EC, Annex I]	A
13	DE-AdV	3.1	Figure 1	E	Correct the title of figure 1	Figure 1: map of use cases for sub-theme Land Administrative Units	A

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14	DE-Adv	4.1.1	Core Recommendation 1	G	<p>The INSPIRE attributes national level name and residence of authority as well as temporal attributes are “voidable”. In particular, the attribute residence of authority isn’t available in our data sets.</p> <p>These attributes should be deleted from the Core Recommendation and a “Good Practice” should be added.</p> <p>Or</p> <p>In the Core Recommendation should be added “if available” behind these attributes.</p> <p>To this topic see the general comment to 2.3.2.</p>	<p>Good Practice xx</p> <p>It is recommended to provide additional attributes:</p> <ul style="list-style-type: none"> - national level name - residence of authority - temporal attributes <p>Or</p> <p>Core data should include feature type AdministrativeUnit with following attributes:</p> <ul style="list-style-type: none"> - geometry (as surface or multi-surface) - unique and persistent identifier - national code - national level and national level name (if available) - geographical name(s) with the name itself, i.e. its spelling and with information on its language, status and (if relevant) source. - residence of authority (if available) - temporal attributes (if available) in the data set 	<p>NA</p> <p>Core data aims to define priorities for the most useful information, even if it is voidable in INSPIRE.</p>
15	BKG	4.1.1	Core Req. 1	Q	<p>What is meant by “temporal attributes”? If this references only technically to the evolution of the database, the INSPIRE lifecycle attributes are enough.</p> <p>But this is not sufficient. For AU, the official reference dates of the units are very important. E.g. two units may merge to a new unit with the official reference date 1.1.2018 – it is very unlikely that a technician will apply this change in the database exactly on this date.</p> <p>Neither INSPIRE nor this Recommendation support this demand.</p>	<p>The “temporal attributes (in the data set)” are of no real importance for AU and may be skipped from Cor Req. 1</p> <p>If the importance of “temporal attributes (of the real world objects)” should be respected, additional attributes would be needed.</p>	<p>Official reference dates (validFrom and validTo) will be added; it will be recommended to fill these attributes at least for new changes.</p> <p>The INSPIRE life-cycle attributes will be kept as Good practice (as for other core themes).</p>
16	BKG	4.1.1	NOTE 3	Q	<p>Which name attribute “helps users to decide on which name(s) are the most relevant to be displayed on a map”?</p>	<p>Maybe a link to the recommendations for GN could be given here.</p>	<p>The list of helpful attributes is provided: language, status and possibly source.</p> <p>But reference to GN might be added.</p>

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17	EUROGI	4.1.1	National level Page 11 Note 2	T	<p>INSPIRE Establish up to 6 orders of National Levels, but due to the size of different countries and the administrative organization of each of them it is needed a clue to know which orders can be equivalent, for instance some countries achieve its lower order in the order 2, while others need the 6 levels.</p>	<p style="text-align: center;">1st Option:</p> <p style="text-align: center;"><i>Include a paragraph to stablish that:</i></p> <p style="text-align: center;"><i>“it would be desirable to inform of the total amount of levels by country. The right place to inform it would be in the abstractor in the lineage of the metadata.”</i></p> <p><i>For instance, in Finland there are 4 orders: 1st order: Country, 2nd order: Regional State Administrative Agency, 3rd order: Region and 4th order: Municipalities. In Germany, however, there are 6 orders: 1st order: state, 2nd order: federal state, 3rd order: administrative districts, 4th order: districts, 5th order: administrative associations and 6th order: municipalities.</i></p> <p><i>To compare data from the municipalities level of these 2 countries, we would have to select the 4th level of Finland and the 6th level of Germany. Knowing the total number of levels would help to know which 2 levels have to be compared.</i></p> <p style="text-align: center;">2nd Option:</p> <p style="text-align: center;"><i>Include a paragraph to stablish that:</i></p> <p style="text-align: center;"><i>“it would be desirable to inform of the Administrative structure of the country, describing the different levels in the abstract of the metadata.”</i></p> <p><i>For instance, in Finland there are 4 orders: 1st order: Country, 2nd order: Regional State Administrative Agency, 3rd order: Region and 4th order: Municipalities. In Germany, however, there are 6 orders: 1st order: state, 2nd order: federal state, 3rd order: administrative districts, 4th order: districts, 5th order: administrative associations and 6th order: municipalities.</i></p> <p><i>To compare data from the municipalities level of these 2 countries, we would have to select the 4th level of Finland and the 6th level of Germany. Knowing the administrative structure of the country would help to know which 2 levels have to be compared.</i></p>	<p>Good point</p> <p>The principle of documenting the administrative structure has been added in metadata.</p>
18	IGN F	4.1.1		T	<p>Might be useful to add a NOTE explaining why temporal attributes are core (whereas just GP in other themes)</p>	<p>Add such a note (requirements for statistics).</p>	<p>See comment 15</p>

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19	PT	4.1.1	Core recommendation 1	1	<p>Attribute on surface area (e.g., ha) is a relevant attribute on administrative units for statistical purposes. It corresponds to relevant data to characterise the territory and to calculate a number of statistical indicators by combining the information at different territorial levels.</p>	<p>Core data should include feature type AdministrativeUnit with following attributes:</p> <ul style="list-style-type: none"> - geometry (as surface or multi-surface) - surface area (e.g., ha) - unique and persistent identifier - national code - national level and national level name - geographical name(s) with the name itself, i.e. its spelling and with information on its language, status and (if relevant) source. - residence of authority - temporal attributes (in the data set) <p>Note 5: the attribute on surface area stands as a relevant information to derive statistical indicators including in combination with other statistical data (such as population to derive e.g., population densities) and other data on surface area (such as data on forest area, built-up area).</p>	<p>NA Surface may be derived from geometry.</p>
20	ESTAT	4.1.1	Core Rec 1	T	<p>add INSPIRE ID of geographical name of residence of authority</p>	<p>add INSPIRE ID of geographical name of residence of authority</p>	<p>NA In INSPIRE, Geographical Names are data types and don't have an identifier.</p> <p>However, the geographical name of AU should be captured. Annex I explains several ways to implement it (figures 4 and 10)</p>
21	BKG	4.1.2	Figure 2	T	<p>This figure has been obviously copied from INSPIRE – nevertheless it's not correct! It indicates that Exclusive Economic Zone and Continental Shelf are measured from the outer limit of the Territorial Sea – this is not correct! Both are measured from the Baseline!</p> <p>See: http://www.un.org/depts/los/convention_agreements/texts/unclos/closindx.htm (Part V, Article 57; Part VI, Article 76 (6))</p>	<p>This has to be corrected in the INSPIRE data spec AU.</p>	<p>You are right!</p> <p>Illustration has been kept but a NOTE has been added to document the issue.</p>
22	DE-Adv	4.1.3	2nd paragraph	G	<p>Follow the INSPIRE-terminology and use "edge-matched" instead of "technically agreed". (see 1089/2010/EC, 4.3.2)</p>	<p>In INSPIRE terminology, the respective boundaries should be "edgeMatched", i.e. ...</p>	<p>"edge-matched" has been added.</p>

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23	DE-Adv	4.1.3	3rd paragraph	G	Follow the INSPIRE-terminology and use “agreed” instead of “legally agreed” (see 1089/2010/EC, 4.3.1)	In INSPIRE terminology, the respective boundaries should be “ agreed ”, i.e.	<p>NA</p> <p>In INSPIRE data model, name of attribute is “legalStatus” and the default value is “agreed”.</p> <p>For an explicative text, “legally agreed” looks more accurate than just “agreed”, staying in the INSPIRE terminology spirit.</p>
24	DE-Adv	4.1.3	4th paragraph	E	<i>Add edge-matched.</i>	<i>This deliverable recommends in a following paragraph to have both technically (edge-matched) and legally agreed boundaries.</i>	A
25	BKG	4.1.3		T	<p>The first sentences refer to units and should be moved to 4.1.1 or 4.1.2.</p> <p>Furthermore, not in every case the land AU of same national level form a complete partition of a country. E.g. only few German “Länder” (AU level 2) are subdivided into “Regierungsbezirke” (AU level 3) – there’s no complete coverage of AU level 3 for Germany. This shouldn’t be misunderstood as “gaps between units”.</p> <p>(A similar situation for maritime units is not known to me.)</p>	<p>Move first sentences to 4.1.1 or 4.1.2.</p> <p>A short clarification would be helpful.</p>	The partition topic has been moved to chapter 5.2 (metadata), the German case being mentioned as example.
26	DE-Adv	4.1.3 4.3 4.5.1		E	Work uniform within the document and begin the theme “administrative Units” and the sub-theme “land administrative units” with capital letters.	<p>e.g. chapter 4.3</p> <p>In most countries, the Land Administrative Units stop at the coastline. However, in other countries, these Land Administrative Units may include coastal areas.</p> <p>Figure 3: Land Administrative Units stopping or not at coastline, according to countries</p> <p>... respectively for their sea and land parts, as done by the EBM product or in the ELF application schema for theme Administrative Units.</p> <p>Good Practice 3</p> <p>For countries where (Land) Administrative Units include ...</p>	<p>NA</p> <p>In most sentences, ‘administrative units’ design the features and not the theme or sub-theme.</p> <p>Anyway, minor issue.</p>
27	PT	4.2.1	Core recommendation 3	E		Core data should on land administrative units should be captured at large scale (master level 1).	A

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28	DE-Adv	4.2.1	Core Recommendation 3	E, G	<p>Delete "should" behind "Core data" and begin the sub-theme "land administrative units" with capital letters.</p> <p>Core data should also be captured at master level 0, because this level shouldn't be derived from a smaller scale. Add master level 0.</p>	Core data on Land Administrative Units should be captured at large scale (master level 0 or 1). Other levels of detail (at least Regional and Global) should be derived from the large scale core data.	A
29	DE-Adv	4.2.1	Note 2, 2nd sentence	E	Follow the INSPIRE-terminology and use "edge-matched" instead of "technically agreed".	It is recognised that getting edge-matched international boundaries ...	"edge-matched" has been added.
30	Eurogi	4.2.1	Page 13 Paragraph 1 Scales	G	Apart for being in various scales, it should be recommended a specific scale in each range to facilitate matching processes	<p>Add "At each level it should be established a recommended scale:</p> <p>Master Level: recommended scale 1:10.000 Regional Level: recommended scale: 1:250.000 Global level: recommended scale 1:1.000.000" to the already present text</p>	<p>NA</p> <p>Well-defined scales are not so meaningful for digital data.</p>
31	BKG	4.2.2		Q	Why only Master Level 1? If the coastlines is used as baseline (inner limit of territorial sea), shouldn't it be generalized as well for other LoD?	Add a statement that coastlines (as baseline) should be delivered for different LoD.	<p>A</p> <p>A NOTE has been added.</p>
32	DE-Adv	4.3 7.1.1.4	Good Practice 3	G	<p>Schema extensions related to INSPIRE creates additional burden in the Member States of the European Union. It leads to a 3rd data model in addition to INSPIRE and the national data, in Germany AAA-model. Both models are legally binding.</p> <p>Schema extensions related to INSPIRE should only be considered by data producers and national data users outside the European Union.</p> <p>Please check this note and, if appropriate, complete the text in this regard.</p>		<p>It is true it is additional burden but it is driven by user requirements.</p> <p>Ideally, the content recommended for core data (sometimes with extensions to INSPIRE) should be included in the AAA model.</p>
33	BKG	4.3	Figure 3	T	<p>The figure is a bit misleading. LV and EE include territorial sea in AU, but as one single unit – the sea area can be simply deleted.</p> <p>That's different for NO, SE, FI, where the communes stretch into the sea. The sea area cannot be simply deleted as the data does not include the coastline (even not in indirect way).</p>	Might be ok to leave this figure as it is.	Thanks for the information ... but we will let the figure as it is, unless you can provide a better one.

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34	Sweden	4.3 Page 14	Good Practice 3		For the Swedish case it is important to show that all of Sweden is divided into real property units; regardless of coastal zone or not. Some properties include water (private waters). The water that is not included in the real properties is public water.	I am hesitant if good practice 3 is of value as a specific additional feature type. The real properties in the Swedish case can include both land and water as one unit.	It is quite fine that Sweden is divided into real property units that may include land and water. Good practice is not addressing this use case but the use of AU for statistical purposes: in this case, it would be useful to make distinction between the land and the sea part of AU.
35	Norway	Chapter 4.3.		Q	The geographical extent of Administrative Units and regions are not always clear. UN and EU are not always consistent. How is Europe delineated, and how should overseas territories with different types of legal status be treated?		Delineation of Europe (or of where UN-GGIM : Europe deliverables should apply) is a common question for all core themes => might be considered in a future FAQ. Core data provide recommendations that are common to all or most European countries. Oversea territories with special legal status are national specificities and so out of core data scope. It is up to MS to deal with this issue. A NOTE has been added to recommend to document these specificities in metadata.
36	ESTAT	4.4.1	Land Administrative Units Good Practice 4	Q	What about considering cadastral parcels as the 'atomic' administrative level?	Consider the suggestion.	NA Cadastral parcels are in a specific Core data theme. The core data recommendations are about defining priorities for data production and enhancements => we try to avoid duplication between themes.

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37	Croatia	4.5.1	All official names of land administrative units should be captured and provided.	E	The standardisation of official names should be implemented – ISO or something else:		<p>A NOTE will be added promoting use of standardised names.</p> <p>But standard ISO 3166-1 is about country acronyms. I am not aware of any ISO standard about country names.</p> <p>“The purpose of ISO 3166 is to define internationally recognised codes of letters and/or numbers that we can use when we refer to countries and subdivisions. However, it does not define the names of countries – this information comes from United Nations sources (Terminology Bulletin Country Names and the Country and Region Codes for Statistical Use maintained by the United Nations Statistics Divisions).”</p>
38	Eurogi	4.5.1	Page 15 Recommendation 5 100% completeness	G	It is very important to ensure that all countries have their data updated and with 100% integrity. Occasionally, some countries have lack geometries and others do not have their last version completely updated.	Include to the recommendation “ <i>If temporally a country publish data not 100% complete, this should be declared in the abstract of the metadata</i> ”	<p>NA</p> <p>Completeness is a core recommendation and looks achievable for AU (at least, at the reference date of the data).</p>
39	BKG	4.5.1	Core Req. 5	T	I'm unsure if all countries really maintain all types of maritime units.	I propose to change from a recommendation to good practice for maritime units.	<p>NA</p> <p>It is a key requirement.</p> <p>Completeness doesn't mean that all possible values of the data model are filled, just that all existing real world entities are captured in data.</p> <p>Typically, Austria or Switzerland don't have any kind of maritime units.</p>

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40	ESTAT	4.5.1	Core Rec 6	T	also all official names of the residence of the authority	All official names of land administrative units and the residence of their authority ...'	NA There are not always official names for the residence of authority. For instance, at large scale it may be just a building.
41	BKG	4.5.2	Core Req. 7	Q	Why to mention seamless European data here? Isn't this Recommendation addressing UN member countries?		Core data recommendations address mainly MS but might address other public bodies, such as EuroGeographics or European Commission, if they play a role as data producer or data integrator.
42	Croatia	4.5.2	Core Recommendation 7, Note 2	G	The note/information about the availability should be announced to all countries at the same time.		In practice, it will be availability of EBM
43	Croatia	4.5.2	Core Recommendation 8	G	The information about the technical language or software should be also somewhere listed.		NA Purpose of core data is to define priorities regarding data content. Detailed process (software, technical language) is out of scope
44	DE-Adv	4.5.2	Core Recommendation 7	E	Follow the INSPIRE-terminology and use "edge-matched" instead of "technically agreed".	<i>Core Recommendation 7</i> <i>For Regional and Global data, there should be a seamless European data set of Land Administrative Units, with edge-matched administrative boundaries (except on areas under political dispute).</i>	A "edge-matched" was added.
45	DE-Adv	4.5.2	Core Recommendation 8	E, G	Follow the INSPIRE-terminology and use "edge-matched" instead of "technically agreed". Also consider the comment on Core Recommendation 3 – Master level 0.	<i>For large scale data (Master level 0 or 1), there should be, in each Member State, a national data set of Land Administrative Units, with edge-matched internal administrative boundaries.</i>	A See comment 28
46	DE-Adv	4.5.2		E	Add edge-matched.	<i>Significant progress to get technically (edge-matched) and legally agreed international boundaries ...</i>	A
47	DE-Adv	4.5.2		E	Follow the INSPIRE-terminology and use "edge-matched" instead of "technically agreed".	<i>... GIS representation, i.e. before publishing edge-matched boundaries.</i>	A

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48	Croatia	4.5.3	Good Practice 8	E	Glossary should contain the definition on stakeholders, who are they within the country and outside of the countries.		<p style="text-align: center;">NA</p> <p>The stakeholders may depend on the countries. In general, it is anyone having interest to use this data. It doesn't look desirable to publish a list as it would likely forget some potential users who would seem to be excluded.</p>
49	Croatia	4.5.3	Note	G	On each administrative unit or cadastral parcels should be kept data history with the possibility of retrieving data on certain date during the calendar year. The data should be regularly updated by using modern technologies (i.e. satellite images).		<p>See comment 15 about management of historic features. See also chapter about temporal aspects (4.1.3) and 6.4.</p> <p>Administrative boundaries are defined in legal texts; it is quite unsure that satellite images would be very helpful to update them.</p>
50	Croatia	4.5.4	Note 2	G	This action is necessary for monitoring the data quality; for doing the comparisons and analysis over the time.		<p>This is why there is Good practice 10.</p>
51	ESTAT	4.5.4	NOTE 2	T	Eurostat prefers 31.12.	change e.g. 31st December of the year before	<p>It is only an example. "31 December" has been added.</p> <p>Note that, in some countries (such as France), there are generally changes occurring by law on 01/01. Using 31 December as reference date would imply data very soon outdated.</p>
52	ESTAT	4.5.4	Temporal consistency	E	This section is not only on temporal consistency, but also on temporal accuracy and timeliness.	Change the title into "temporal aspects" OR split the section into two sections: "Temporal consistency" with only recommendation 9, and "Temporal accuracy and timeliness" with the rest of the paragraph.	<p>Section will be renamed "Update frequency".</p>
53	ESTAT	5		E	The information provided here is not specific to AU theme.	Remove the whole section or move it in another document with common principles.	<p style="text-align: center;">NA</p> <p>There may be some differences between themes.</p>

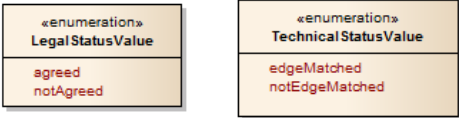
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54	DE-Adv	5.1.1	Good Practice 11	G	Good practice 11 should be a recommendation. To ensure interoperability it's not sufficient to recommend "a CRS based on ETRS 89". At least the EPSG-Code should be stated mandatory	Core Recommendation xx Core data should be stored and managed in a CRS based on datum ETRS89 in areas within its geographical scope, either using geographic or projected coordinates. The EPSG-Code of the CRS should be stated.	NA Member States could use a national CRS as long it is based on the ETRS89 datum.
55	IGN F	5.1.2		E	Possibly, add that AU are expected as 2D data		A
56	Croatia	5.2	Good practice 12	E	And stored/registered in the metadata catalogue.		NA Though you are right (this is a necessary step), this document focus on data content; whole SDI management is out of scope.
57	DE-Adv	5.2.	Good Practice 12	G	Add the Implementing Rules, because only these documents are legal obligations for the Member states belonging to the European Union (see the NOTE below the recommendation). Good practice 12 should be an recommendation. (See Core Spatial Data Theme Addresses)	Core Recommendation xx Core data should be documented by metadata for discovery and evaluation, as stated in the INSPIRE Implementing Rules for metadata and for interoperability considering their corresponding Technical Guidelines.	The sentence has been corrected but main objective is to conform to TG.
58	DE-Adv	5.2.	Good Practice 13	G	Add the Implementing Rules, because only these documents are legal obligations for the Member states belonging to the European Union (see the NOTE below the recommendation). Good practice 12 should be a recommendation. (See Core Spatial Data Theme Addresses)	Core Recommendation xx Core data should be made available according to the INSPIRE Implementing Rules for metadata, for interoperability and for services considering their corresponding Technical Guidelines.	The sentence has been corrected but main objective is to conform to TG.
59	ESTAT	5.3.		T	Administrative data should be made available in line representing the boundaries, polygons and point representing the centroid topology at all scales. The border lines should carry an attribute with the status (agreed, disputed)	Add this requirement as a core recommendation please	NA The recommended content has already been described in 4.1. The point centroid is not considered as core information. Might be automatically derived for specific user needs.
60	Sweden	5.3 Page 18			Delivery	Should a reference be made here to UNCLOS? Information about specific maritime data should be deposited with UN.	Good point
61	IGN F	5.3		T	Might be useful to promote delivery of AU data as Linked data	Add a Note or GP about linked data.	To be added in Considerations for future (as for theme AD).

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62	BKG	6.2.1		T	The title "Data from the past" sounds a bit strange (but I don't have a good alternative). As mentioned above (4.1.1), the INSPIRE lifecycle attributes don't support the maintenance of AU for specific reference dates.		No action (as no better proposal)
63	ESTAT	6.2.1	first para	E	better use time series	replace long rows with time series	A
64	Norway	Chapter 6.2.1.		E	National Statistical Institutions, and other authorities, have long historical time lines with data linked to administrative units. Population and Housing censuses are among the most common sources. Digitizing of old records is more and more common and feasible, both attributes and geographical features. It should hence be a recommendation to establish historical administrative borders.	Following is proposed added under chapter 5 Other recommendations: "5.4 Data from the past Good Practice 14 Historical administrative units should be established, managed and made publicly available where feasible."	NA Historical data is under "considerations for future" in other themes. Capturing historical data is of interest but it is not a priority and might imply significant costs. But a sentence will be added to say it is more and more common and feasible.
65	PT	6.2.1	Paragraphs 1 and 2	T	Availability is not the only dimension to guarantee in data series. Consistency and comparability must also be achieved.	Land administrative units are often used as statistical units. One of the purposes of statistics is to show the trends on a given topic through time. To understand and describe these trends, statisticians use "long rows", i.e. statistic data related to many years. Of course, this is possible only if the geographic data related to these statistical units are available for the past years and has remained consistent for comparability over time. This may be achieved according two ways. In most favourable case, the data provider has already managed for years the temporal life-cycle attributes in the database and may provide administrative data at a given date of the past. Else, it may require specific efforts to retrieve the administrative data from the past and to guarantee that data is consistent and comparable for a time series analysis.	NA Administrative units describe the administrative organisation of a MS and may evolve along time. AU may be used as SU but it is not their main function: it is to know the territory of competence of each level of government.
66	DE-Adv	7.1		E	Another colour for Core Recommendation would be better. The colours for Core Recommendation and Good Practice are difficult to distinguish	Change the dark green, for example, to red.	NA It is more logical to use same colour (general idea of selected information) with different values (giving the idea of priority)

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67	Eurogi	7.1.1.1	Page 21 Paragraph 2 Country code	T	<p><i>"The 'countryCode' that is a mandatory attribute of INSPIRE doesn't need to be managed and stored at feature level and may be provided for INSPIRE"</i></p> <p>Gathering data from several countries on the same map, this code is necessary to make filters and handle data of different countries and to allow automatization process.</p>	Do not include the elimination of the mandatory aspect countryCode at feature level.	<p>NA</p> <p>It is not an exclusion just an explanation.</p> <p>It is current practice for NMCA to provide this code for European products or initiatives (EBM, INSPIRE) without storing it at feature level.</p>
68	Eurogi	7.1.1.1	Page 21 Paragraph 1 Identifier	T	<p>The identifier structure is defined in three parts ("namespace", "localId" and "versioned") but each of them does not follow a fixed structure. Sometimes the 'namespace' of the identifier can be a large URL (http protocol. Example of Finland: http://paikkatiedot.fi/so/1001074/au/AdministrativeUnit/) or a short code (URN. Example of Belgium: FED: GAPD: AU) depending on each country.</p>	Add a recommendation of how to implement the unique identifier	<p>NA</p> <p>What is required is to have <u>unique</u> identifiers.</p> <p>WG A is not aware of any requirement for a common structure, whereas proposing a common structure might raise feasibility issues.</p>
69	DE-Adv	7.1.1.1	Core Recommendation 1	T	See comment to 4.1.1		
70	DE-Adv	7.1.1.1	Paragraph below figure 4	T	Identifier has to be different for all levels of detail, also including Master Level 0	It has to be different for all levels of detail.	A
71	DE-Adv	7.1.1.2	Figure 6	E	Add "from INSPIRE" in the title.	Figure 6: core content from INSPIRE for MaritimeUnit	A
72	DE-Adv	7.1.1.3	Figure 7	E	Add "from INSPIRE" in the title.	Figure 7: best practice from INSPIRE for AdministrativeBoundary and MaritimeBoundary	A
73	DE-Adv	7.1.1.3	Figure x	G	Add a figure with the allowed values for the enumeration LegalStatusValue and TechnicalStatusValue	 <p>The figure shows two boxes representing enumerations. The first box is titled «enumeration» LegalStatusValue and contains the values 'agreed' and 'notAgreed'. The second box is titled «enumeration» TechnicalStatusValue and contains the values 'edgeMatched' and 'notEdgeMatched'.</p>	A

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74	DE-Adv	7.1.2		G	<p>The implementation of INSPIRE is legally binding in the Member States of the European Union. Therefore, an alternative data model creates additional burden and should only be considered by data producers and national data users outside the European Union.</p> <p>Please check this note and, if appropriate, complete the text in this regard.</p> <p style="text-align: center;">(see above comment on good Practice 3)</p>		<p style="text-align: center;">NA</p> <p>The INSPIRE data model is for delivery of data (for INSPIRE users)</p> <p>The alternative data model is just a potential and optional model for data production and/or for delivery to other users. It corresponds to the current practice of several NMAs.</p>
75	BKG	7.1.2.1		T	<p>This is valid for all LoD (not only Master). It's not very user-friendly to provide all units of all admin levels in one feature type. However, the feature type names in figure 9 (province, district,...) are debatable.</p>	Skip Master level 1	<p style="text-align: center;">A</p> <p>You are right; in fact, it depends if national users or European/international ones.</p> <p>Feature type names will be kept as no better proposal.</p>