

Progressive comment number	SDIC ID	LMO/SDIC	Comment ID	Chapter, section or clause no./ Subclause No./Annex	Paragraph/Figure/Table/Note	Type of comment	Comment (justification for change)	Proposed change	Comment from DT	Action Taken
219	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	5	general		G	an overview of all reports needed under INSPIRE would be helpfull and is missing	include	The Directive requires only one report from the MS, every three years (see Article 21(2)); so it is in the IR MR (chapter VI).	No action
349	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	2	general		G	an overview of all eports needed under INSPIRE would be helpfull and is missing	include	see 219	see 219
220	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	6	I or II		G	An overview of the indicators is missing, e.g. as a bullet point list: completeness, conformity, accessibility, performance, use; with an explanation as to where they are to be applied	add list	The IR MR is a legal text: it is not the place to provide an overview of the indicators with explanation. It is possible to add it in the guidelines.	Guidelines: add an overview of all the indicators with an explanation as to where they are to be applied.
350	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	3	I or II		G	An overview of the indicators is missing, e.g. as a bullet point list: completeness, conformity, accessibility, performance, use; with an explanation as to where they are to be applied	add list	see 220	see 220
274	AGI - Association for Geographic Information	SDIC	3	General		G	Lack of indicators on data and service sharing is disappointing.	Suggest: 1) A reference to complaints and appeals mechanisms within MS with measures of their usage. 2) A measure of the number of other public authorities using a particular dataset in each time period and how that has changed from the previous time period.	The suggestions are interesting but: -about suggestion 1: the use of "complaints" is too negative to be used as an indicator for data-sharing, also an indicator on the use of services is already proposed (see paragraph 12 of the IR) ; -about suggestion 2: such a detailed indicator will put burden on MS. It will be up to them to decide to use such an indicator but it is not acceptable to make it mandatory. For more details, see the "Justification document". The Report part of IR could propose as examples such data.	IR MR: the article 16 of the IR will be rewritten taking into account all the comments on data-sharing and the discussion with DT DSS.

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276	AGI - Association for Geographic Information	SDIC	5	General		G	Why are there no rules on data sharing? The 'Justification Document' states that this is because it is not practical to do so, and no meaningful indicators can be established. This would appear to apply equally to other areas, where the proposed indicators are equally impractical and meaningless (see other comments). Instead the 'Justification Document' proposes that it was better to capture data sharing practices through the 3 yearly report, with qualitative rather than quantitative information. This is eminently sensible in principle, and could be extended to reporting other aspects.	Add chapter on data sharing, and amend other chapters to follow suit.	The DT MR and DT DSS decided not to put an indicator on data-sharing in the IR but to propose surveys in the guidelines in order to help MS in describing the data-sharing process for the report obligation.	IR MR: the article 16 of the IR will be rewritten (see comment 274). Guidelines: develop possible surveys to be used by MS to report on data-sharing.
METHODOLOGY										0
314	WMO-RAVI - World Meteorological Organisation Region VI grouping (RAVI)	SDIC	1	all	all	G	What is the responsibility of SDICs to report to INSPIRE? Under this IR there is no route and no advice, but INSPIRE has asked for comments from registered SDICs. It is to WMO that the responsibility of WMO Members lies in making data interoperable. Surely it is not a Member State responsibility to report conformance of WMO data, but might the Commission liaise directly with WMO, and remove the requirements on multiple MS to do this reporting?	There must be advice or explicit arrangements for international SDICs in this report.	The SDIC and LMO have no responsibility to report about INSPIRE. It is the responsibility of the MS. Each MS will define/organise how stakeholders are involved in INSPIRE implementation. For example, national/local antenna of WMO could be involved.	Guidelines: explain how to deal with transnational datasets. Guidelines: explain that IR are for MS, not for SDIC/LMO.
1	GMFS - ESA GSE Global Monitoring for Food Security	SDIC	1	IV.7	5	G	Case of trans-national datasets, provided by for instance international bodies or SDI in specific Member States, should be investigated more thoroughly. Example: satellite raster data (as in guidelines). Such bodies may provide the datasets directly to EU services (i.e. JRC in case of GMES). Admittedly, this is somewhat beyond the scope of Inspire, which is in theory limited to NSDIs and the EU SDI, but in practice INSPIRE compliancy is already being requested to such providers of trans-national data. Having them report the area coverage through each of the member states is inefficient (bodies could report directly to EC services rather than multiplication of effort through each Member State) and also requires the Member States to look for such trans-national (i.e. EU level) datasets in other Member States, and get information on their actual coverage of the Member State from them, which may cause legal issues.	Provide guideline or adjust IR to this particular case.	See n°314	See n°314
300	Met Office	LMO	MetO03	2.2		G	Atmospheric/meteorology/oceanography/sea regions are shared via WMO resolution 40 and EUMETNET sharing agreements, and are delivered commercially through ECOMET. What are the responsibilities of MS to report these supra-national data and services sharing?	Please comment on the reporting responsibilities of MS for supra-national data sharing via SDICs. Should this be done once? By the SDIC, by every MS or should the Commission do this reporting?	See n°314	See n°314
310	Met Office	LMO	MetO13	14 15 and 16		G	This does not deal with SDIC data	Please explain how SDIC metadata, data and services are to be handled by each MS.	See n°314	See n°314

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299	Met Office	LMO	MetO02	1.3		G	Since this is directed at MS, it leaves uncertainty as to responsibilities of individual LMOs, and in particular to SDICs who are cross-national or supra-national. There is no advice on how supra-national metadata, data and services are to be monitored. Although the remit of the Directive is Member States, the MRDT must express an opinion on how the services from SDICs are reported. This is particularly important from Meteorology and Oceanography, because restricting datasets to only national datasets will reflect a very small proportion of the atmospheric, meteorological, oceanographic and sea regional data.	Please comment on how SDIC data and services should be reported: a) not at all - in which case they are outside of INSPIRE b) reported by the SDIC even though they are not within the INSPIRE mandate c) reported by every MS which has LMOs as members of the SDIC d) reported by MS only if they have IP in the SDIC data e) not reported by MS unless they have sole IP in the SDIC data f) reported by a single MS (how so chosen) g) other reporting criteria e.g. the Commission should gather this information and direct MS not to report this.	See n°314	See n°314
20	Geonovum	LMO	2			G	Designating data collection and measurement of indicators to the person from the member state country may in some cases be risky. It is highly possible that the person responsible for data collection may for some reason (e.g political) be forced to report results that do not necessarily reflect the reality.	Set up kind of independent auditing procedure (independent EU auditing delegation)	The EC trusts MS. The IR MR has to be clear enough in order to avoid different interpretations.	No action
347	Czech Office for Surveying, Mapping and Cadastre	LMO	15 to 15			G	Processed Monitoring and Reporting Implementing Rules fully correspond to obligations given by the Directive in the Chapter VII. During implementation we received Implementation Rules for other parts (services and metadata) to comment them, introducing specific technical requests. Based on fulfilling of these requests, introduced in these IR, dataset, metadata or service can be stated as conform to IR. This assumption is further the source for stating of individual monitored data in monitoring and reporting, for instance performance, availability and capacity for net services or for the item degree in metadata IR. However, there was not stated in any provided suggestion so far, how will be tested fulfilling of technical requests. Fulfilling of these criteria should be tested on the infrastructure level either on European or on member states' one, but in no case on the providers' level. We are at present in the phase of testing of system stability, availability, capacity etc. Of our spatial datasets and services. Nevertheless we think, that to ensure objectivity and		The conformity to achieve for INSPIRE is defined in each IR (metadata, network services...). The IR MR doesn't define how the conformity is measured but monitors if "YES" or "NO" each aspect of the infrastructure is in conformity with INSPIRE. Some indicators will not be calculated as long as other IRs are not adopted (e.g.: conformity of spatial data sets). (see n°272 - 140 - 245 - 246 - 39)	Guidelines: explain how MSs will deal with "conformity" Guidelines: add a calendar with the dates of future IRs in order to explain when indicators will begin to be calculated.
67	National Land Survey of Finland	LMO	2	1.3., 2.2.		G	Monitoring and reporting rules are missing implementation and use of INSPIRE-EU Geoportal as for use of data and services from Member States. This may have remarkable reflect and impact in figures of use of spatial data services (clause 12), usage of the infrastructure for spatial information (clause 15) as well as cost benefit and productivity calculations on Member State level.	The cross-border use of information and services through EU Geoportal may on a part include in the service requests on national level (clause 12) but should be specified on EU portal separately.	The IR MR defines the obligation for the MSs, not for the Commission. All the monitoring and reporting tasks regarding the EU Geoportal are under the responsibility of the EC.	Guidelines: explain the monitoring at the level of the MSs (not stakeholders neither EC), as a FAQ for example

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215	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	1	WHOLE DOCUMENT	WHOLE DOCUMENT	G	The effort to fulfil these Implementing Rules in a large SDI like GDI-DE in Germany with (estimated) several thousand Data sets and more than thousand active Geospatial services will be enormous. The necessary effort to carry out Monitoring and Reporting must be very efficient and not exceed reasonable costs. The national SDI must be the decision-making-authority about the level where the M&R will be carried out (top-national-level where services will be finally provided or directly at the level of data-producers)	None	The DT MR agrees with the sentence "The national SDI must be the decision-making-authority about the level where the M&R will be carried out ". Feasibility: indicators have to be seen as an help for MS not a burden. The implementation of IR MR will be done step by step: some indicators will remain empty as long as other IR haven't been adopted (e.g. data specifications). In the meantime, MS will begin to implement INSPIRE so they will have to decide: which datasets are involved, which stakeholders, what will be the organisation... so the indicators and report information will be useful in that step-by-step approach (see also first sentence of n°307)	Guidelines: report on feasibility tests and explain the pragmatic approach to be followed
139	Department for Environment, Food and Rural Affairs (Defra)	LMO	1			G	The indicators developed must allow us to monitor and report on the implementation of the Directive, as per Article 21, but must also be designed so as to provide meaningful and relevant information.		The objective of the DT MR is indeed to monitor and report the implementation of the Directive and also to provide useful information for MS.	Justification document: add a paragraph "methodology on defining indicators" (copy-paste the paragraph 4.2 from D5.2 Monitoring indicators)
19	Geonovum	LMO	1			G	The Draft does not say how the results of the monitoring and reporting will be used. Will the results be used by the member states as a kind of feedback to improve the performance of their NSDI?	Define procedure to communicate the assessment result to the member states in such a way that they can use it for improving their weak points.	The results from the MSs will be used to report to the Parliament and the Council (every six years, see Article 23). The MSs are free to use it as a feedback (it has been indeed the objective of the DT MR to propose indicators relevant for the EC and the MSs) so the way to do it will not be defined in the IR.	Guidelines: explain how the results of monitoring and reporting will be used by the EC (article 23 of the Directive) and how the results could be used by MSs (stick to the implementation of INSPIRE), as a FAQ for example.
272	AGI - Association for Geographic Information	SDIC	1	General		G	Assumptions have been made in this IR about what the other IRs will contain. Given that many of the other IRs have not yet been drafted, it is premature to specify how conformity to them is to be monitored and reported since these assumptions may well not be correct.	Re-think indicators (see other comments)	See n°347	See n°347
140	Department for Environment, Food and Rural Affairs (Defra)	LMO	2			G	The ability to meet Monitoring and Reporting requirements is dependent on other IRs being available. For example, according to the Commission's transposition phase work programme published on the 16th May 2007, implementation of the provisions for monitoring comes into effect on the 15th May 2010. However, some of the IRs for which we have to monitor compliance with, will not be available until after this date: for example, adoption of the IRs for the interoperability and harmonisation of spatial data sets and services for Annex II and III spatial data themes is not scheduled until the 15th May 2012. Hence, this suggests an iterative or phased approach, with monitoring and reporting returns becoming more comprehensive over time.	Include a statement that the ability to fully comply with the IR requirements is dependent on the other IRs being in place.	See n°347	See n°347

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298	Met Office	LMO	MetO01	all	all	G	The approach which the MRDT have taken is that the requirements on conformance will be fully defined by other DTs. However even in the draft Irs which have been produced already, we feel there is considerable uncertainty in what is required for conformance. Should this continue into implementation, which unfortunately seems very likely, it will cast doubt on the validity of comparing the reporting across MS.	Please pass this comment to the Commission.	See n°347	See n°347
39	Royal Netherlands Meteorological Institute (KNMI)	LMO	3	-	-	G	A lot is dependent on the Implementation Rules, but not all details are known yet of the IR.		See n°347	See n°347
245	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	31	III-V		G	To implement metadata access and other services it is necessary to adopt the regulations of the data specifications first. They will be the base to determine which datasets has to be provided within INSPIRE.	Please deliver a timeplan for the implementation of MR which considers the other Implementing Rules, especially data specification	See n°347	See n°347
246	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	32	III-V		G	In relation to the INSPIRE roadmap for the IRs and the first monitoring/reporting (15. May 2010) the dependence between IRs data specifications, network services and monitoring/reporting are essential.		See n°347	See n°347
273	AGI - Association for Geographic Information	SDIC	2	General		G	The 'Justification Document' states that Member States "should make an inventory of all the data sets and services from all the stakeholders involved and agree on this." This is essentially a requirement to produce a central repository of metadata, but this is not mentioned in the IR or elsewhere. Is this the intention?	Clarify requirement.	The sentence of the Justification Document (Member States "should make an inventory of all the data sets and services from all the stakeholders involved and agree on this.") doesn't mean that a central repository of metadata is required.	Justification document: don't use the term "inventory" Guidelines: don't use the term "inventory"
142	Department for Environment, Food and Rural Affairs (Defra)	LMO	4	4	Paragraph 2	G	Paragraph 4.2 states that a list of spatial data sets grouped per theme and by Annex and a list of spatial data services grouped by service type shall be established and updated annually by the Member State. This suggests that it is a matter for the Member State to decide which of its data sets correspond to which theme.	Clarify / confirm.	The list of spatial data sets isn't fixed: it is a dynamic process. It will evolve according to the definition of INSPIRE and the publication of new IR for spatial data sets. It is up to the MS to create the list and update it in order to provide indicators/reports according to the delivery dates (see chapter VII).	Guidelines: explain clearly that the list isn't fixed and will evolve (e.g. creation of new data sets, adoption of IR DS ...)

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5	CNIG-Conseil national de l'information géographique	LMO	2	4.2	Establishing lists of spatial data sets	G	In the guidelines document (section 1.1 related to the lists of spatial data sets, third paragraph), the second sentence is as such : « Each Member State will define which data sets (existing, under development or planned) will be part of the infrastructure for spatial information . » 1. This does not seem consistent with article 4 of the directive which defines which data are covered by the directive, and therefore are part of the infrastructure. 2. Accordingly to article 4.1, the directive covers data existing in electronic data and article 4.4 makes it clear that collection of new data is not required by the directive ; therefore, under development and planned data sets are not covered by the directive and should not be referred to in the implementation rules (nor in a document related to them).	clarify the guidelines document	Each MS will define which data sets contribute to the infrastructure. The directive makes a distinction between "newly collected data sets and extensively restructured data sets" (delay to achieve the conformity: two years after the adoption of IR DS) and "other spatial data sets" (delay to achieve the conformity: seven years after the adoption of IR DS). That is why the IR MR proposes to take on board: -existing data sets and -data sets under production process (that will become "newly collected data sets"). This will help MSs having a visibility on implementation of INSPIRE. But it is the task of each MS to decide: -if a data set under production process will be part of the infrastructure -and when .	Guidelines: Erase "planned" and use "under production process". Guidelines: add an explanation on "when do a MS have to put a data set "under production" in the list"? And explain how actual and relevant area is calculated.
97	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	1	4.2	Establishing lists of spatial data sets	G	<i>In the guidelines document (section 1.1 related to the lists of spatial data sets, third paragraph), the second sentence is as follows : « Each Member State will define which data sets (existing, under development or planned) will be part of the infrastructure for spatial information . » 1. This does not seem consistent with article 4 of the directive which defines which data are covered by the directive, and therefore are part of the infrastructure. 2. Accordingly to article 4.1, the directive covers data existing in electronic data and article 4.4 makes it clear that collection of new data is not required by the directive ; therefore, under development and planned data sets are not covered by the directive and should not be referred to in the implementation rules (nor in a document related to them).</i>	clarify the guidelines document	see 5	see 5
297	Institute of Geodesy, Cartography and Remote Sensing	LMO	2	4.2		G	It should be made clear whether the number of spatial data sets/services available in each Member State, given by this list, will be used to calculate the subindicators (this would be logical). In the current version, this is not evident.	At the instructions for the calculation of all (sub)indicators, "divided by the number of spatial data sets/services for that Annex" should be complemented by "... the number of spatial data sets/services available in the Member State ..."	The "number of spatial data sets/services" will indeed be used to calculate the sub-indicators.	IR MR: modify the chapter VII in order to clearly ask the data to be published Guidelines: the number of ...is a data to be published
307	Met Office	LMO	MetO10	4.2		G	This seems to be a considerable task to collect data across all themes and Annexes. What happens to data sets which cross thematic areas. The information in D2.3 was insufficient. Will the TWGs advise, or do they not have cross-thematic knowledge?	Please comment on how cross thematic datasets are to be treated. Will they be multiply reported?	Yes, a data set that covers several themes will be reported in each theme.	Guidelines: check the explanation already provided in the guidelines on the way to report data sets involved in several themes (1.1).
164	Instituto Geográfico Português	LMO	2	Chapter II	4.2	G	it is not clear when the list of spatial datasets corresponding to the existing datasets in the Member State (MS), is officially assumed by the MS.		See n°142	See n°142 See n°347 (add a calendar in the guidelines)

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237	Lenkungsgremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	23	II	39482	G	The lists of spatial data sets and the data services are still unknown (Data Specifications) or not specified. So a meaningful assessment is difficult at this time. It is incomprehensible how the grouping of all data services according to the discovery services to be carried out. So far there are no organizational standards for the introduction of discovery services. There is the possibility that a service is being involved in several discovery services.	Therefore, the final adoption for the INSPIRE Implementing Rules for monitoring and reporting should be passed after the implementing rules for data Specification of topics from Annex I-III. In addition, clear guidelines should be given to the grouping of services in accordance with the discovery services.	"The lists of spatial data sets ... at this time"; it is a dynamic process. See n°142 The GDI-DE has been contacted by mail (through M.Lenk): the confusion came from the uncompleted reference to the type of INSPIRE services, defined by article 11(1)(a-e) and not only article 11(1)(a)	See n°142 IR: modify the sentence and refer to Article 11(1)(a-e)
193	Institut Géographique National	LMO	11	III.5.3		T	Indicators are linked to data sets when the guidelines (clause 1.1) explain that the correspondence between the data sets and themes isn't a bijection. In such a case, the result can be very different from a MS to another so that it will be impossible to compare MSs: a MS who chooses to provide a theme with one data set will be non conformant for a long time when another MS who chooses to provide several data sets for a theme will show visible progress.	Clarify in the IR the way the list should be established in order to provide comparable information.	See n°142 (how to establish the list)	Guidelines: explain that the indicators have to be interpreted carefully and about the comparison with other MSs.
195	Institut Géographique National	LMO	13	III.6.5.d		T	Is there a rule to count the number of spatial data services? If not, the ratio will push MS to declare only services with conformant MD.	Clarify the way the list of services is established.	The way the list of services is established will be clarified.	Guidelines: develop the explanation on the list of services
337	Czech Office for Surveying, Mapping and Cadastre	LMO	5 to 15	III - 5	3	T	It is unclear how to carry on in case the data set corresponds to more themes.		See n°307	See n°307
35	Geonovum	LMO	17	VI, 18		G	The monitoring mechanism will only work if member states can and will produce a complete list of data sets and services within the range of Inspire-definitions. There can be all kinds of reasons to include or exclude data sets or services. This process is not covered now.	Add the approach of the selection process to the reporting.	The approach to the selection process of data sets and services for INSPIRE is interesting to report to better understand which datasets/services are included/excluded in each MS. Add explanation in the guidelines and modify the paragraph 18 (chapter VI).	Guidelines: review the paragraph 1.1 on the establishment of the list IR MR: add a paragraph to report on what is in/out of INSPIRE, in chapter VI - article 13(3)
335	Czech Office for Surveying, Mapping and Cadastre	LMO	3 to 15	III - 4	2	Q	In the art.8 of the Directive , there are mentioned the sets regarding of more Annexes themes From those IR texts is not quite clear how to carry out monitoring in case that the data set corresponds to more Annex themes.Is ti possible to present such a set in monitoring twice? Analogical the explanation of provided services are not clear.		See n°307	See n°307
45	Royal Netherlands Meteorological Institute (KNMI)	LMO	9	III	5	G	The number of datasets in the Annexes is an important factor for calculation of the sub indicators. But the list is not known at the moment. How and when will this number be fixed? Will the number change between the reporting periods?		The establishment of the list is a dynamic process. Add explanation on the update in the guidelines (paragraph 1.1)	Guidelines: add an explanation on the dynamic process of establishing the list, explain how to update the list (paragraph 1.1 and paragraph on the calendar)
355	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	8	III.5		T	If the number of spatial data sets to cover a theme (may be defined by the theme working groups) is allowed to vary/change over the reporting period, e.g. increase over the period of INSPIRE implementation, Then, the use of that information as a baseline is questionable to evaluate the data with available metadata.	please consider	The number of spatial data sets is not fixed; it will evolve regularly but it will be compared to the number of conformant spatial data sets. That is why the indicator is significant.	Guidelines: check the explanation already provided in the guidelines (paragraph 1.1).

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2	GMFS - ESA GSE Global Monitoring for Food Security	SDIC	2	III.5 and III.6	5	T	As mentioned in the preliminary guidelines, dataset series (ie collections of datasets) are to be monitored/reported as a single dataset (ie in Excel). Yet, metadata can exist for both the dataset series and the individual datasets, as for instance foreseen in the ISO 19115 metadata standard. Both types of metadata should exist and are used differently: the former for discovery of the series and links to relevant services, the latter typically for actually looking up/discovering datasets themselves. In the example case of combined "sheets" in Hungary, one can say that the series/collection of sheets is a single data set, with its own metadata as all sheets contribute to the same theme/application and are similar. However, EC services may need to query metadata of individual sheets (ie their bounding box) for establishing if data is available for a specific region or municipality. Also "series" as in ISO metadata standards, is more comprehensive than mere geographical collections like the sheets, so confusion may arise from the use of the term "series".	Clarify the use of the term "series", in relation to the same term used in metadata: geographically/spatially coherent, temporal series, series of data from same sensor/observer,... Also make distinction in indicator of series and dataset metadata as both are relevant, should exist and should be conformant	The guidelines will clarify what is in the list (data sets / series) and explain what MD is monitored (MD of series/MD of spatial data sets).	Guidelines: explain what is in the list (data sets/series) - explain what could be monitored with MD (MD on data sets or MD on series)
286	AGI - Association for Geographic Information	SDIC	15	III, IV	5.3, 6.3, 8.5	T	How is the number of spatial data sets for the theme known? Is it expected that the Data Specifications will prescribe a specific number of data sets? If not, then the only way that the number of datasets will be known is through the metadata.	Re-think sub-indicators.	see n°297	see n°297
336	Czech Office for Surveying, Mapping and Cadastre	LMO	4 to 15	III - 4	2	T	Yearly updating of the list of data sets and services is mentioned in IR.Would it be possible to define the date in IR by which the list should be created and then updated?	for instance by 15.5.	The IR MR will fix the mandatory deadlines (e.g. yearly updating, deadline to publish data). The guidelines could propose a calendar in order to help MS.	IR MR: check/fix the timing proposed in chapter VII Guidelines: propose a calendar with all the dates (dates of the Directive, dates proposed in the IR MR, dates possible for monitoring data ...)
141	Department for Environment, Food and Rural Affairs (Defra)	LMO	3			G	The Monitoring and Reporting IRs should be drafted so that as much of the raw data required to calculate the indicators and sub-indicators can be "harvested" from the metadata, therefore reducing the administrative burden on data providers and Member States. For example, the conformity of spatial data sets (section 8) can be obtained from the mandatory metadata element 7 on conformity.	Consider whether it is possible to modify the indicators so that more of the information required for monitoring implementation of the Directive can be extracted from the metadata.	The paragraph "How to collect raw data" (now called "data") will be develop in the guidelines ; the use of MD elements will also be tested/explained.	Guidelines: develop the paragraph "2-How to collect data for monitoring" - develop a specific paragraph on how to use Metada+P46 Justification document Justify that the conformity of spatial datasets and services will only be able to monitor if first they have compliant metadata

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88	Swedish Environmental protection Agency	LMO	2	4		T	General tools for automatically monitoring and generation of indicators should be developed by the COM and distributed to MS.	Add a fifth bullet.	The IR MR will refer to possible tools in the preamble. It might be possible that the Commission develops a tool for monitoring.	A direct reference to an obligation to develop such tools cannot be included into the Regulation. However, the Commission may decide to develop some tools in support to monitoring
315	Malta Environment and Planning Authority	LMO	1	I, 2	4	Q	Why not use an EEA EIONET style of on-line reporting system that could also be integrated into the CDR if this is possible? The MS would then use an internal reporting process through a national network as EIONET (the latter already includes the key persons, which can be upgraded with the direct-stakeholders)	The use of an EEA-style reporting system based on the CDR dataflow model approach is envisaged. This will be made possible through the creation/enhancement of an EIONET-relative network.	It might be possible that the Commission develops an on-line reporting system. This is not a task of the DT.	See comment 88 above
130	General Administration of Patrimonial Documentation	LMO	5	VII, 19	§ 2	G	We hope that the Commission will provide tools and/or templates (easy to use) to help us		Tools: see n°88 Templates will be provided in the guidelines.	Guidelines: improve the templates proposed for monitoring (spreadsheet) and reporting.
135	FPGI / PFIG - Federaal Platform voor Geo-Informatie / Plate-forme Fédérale de l'Information Géographique	SDIC	5	VII, 19	§ 2	G	We hope that the Commission will provide tools and/or templates (easy to use) to help us		see 130	see 130
123	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	10			G	The content in the IR Monitoring and reporting should be tested	Test the implementing rules in some MS to see how it will be useful in a practical situation	The IR MR has taken into account the result of two feasibility tests (internal test by DT MR members and test by four countries) and also the results of the State of Play of 2007.	No action
182	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	10			G	The content in the IR Monitoring and reporting should be tested	Test the implementing rules in some MS to see how it will be useful in a practical situation	see 123	see 123
87	Swedish Environmental protection Agency	LMO	1	1		G	Important to test these IR and evaluate each indicator before they become mandatory reporting obligations, to justify their relevance. A cost benefit analysis should be part of this evaluation.		The justification document provides explanation of the relevance/motivation (it could be extended). About the test: see n°123 About the cost and benefit analysis: the line to be followed is a pragmatic approach: for INSPIRE implementation, so it is for the monitoring and reporting. Such an analysis is not necessary.	Justification document: review the relevance/motivation

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125	SIOSE National Assembly - National Assembly of the Land Cover and Use Information System of Spain (SIOSE)	SDIC	1			G	Regarding cartographic databases as data sets, as most of them have clearly distinguished reference dates for extracting information and updating, in determining the proposed index (specifically DSi1) it won't be provided a result in agreement with the existing reality. For that reason, we think that continuous updates should be considered when supplying and comparing indexes. In the other hand, in recollecting data for index determination (section 2.3, not developed yet) we think that it is necessary to specify clearly and separately which is the time slot and deadline to produce or update the data, and which is the deadline to provide it, when defining that section 2.3.		see n°336	see n°336
239	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	25	II	4.2	G	The timing of the monitoring is not made clear, i.e. at which state the monitoring is to begin	add information	see n°336	see n°336
352	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	5	II.4.2		G	The timing of the monitoring is not made clear, i.e. at which state the monitoring is to begin	add information	see 239	see 239
353	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	6	II.4.2		G	It should be emphasised in which intervall (annually as well?) the reports are to be completed	add intervall	see n°336	see n°336
86	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	12	all	quantitative indicators	g	are all themes comparable? If not, does it make sense to simply sum them up into a single indicator?		The proposal is to sum up by annex: it is a compromise between the feasibility and the relevance.	Justification document: add an sentence on the compromise
62	Surveying and Mapping Authority of the Republic of Slovenia	LMO	3	5,6,7,8,9,10,11,12		g	Will member states have to monitor and report also sub-indicators?		The chapter VII will be reviewed in order to clearly explain which data has to be published (indicators, sub-indicators and additional data should be published)	IR MR: develop chapter VII with a clear view of what has to be published
319	Malta Environment and Planning Authority	LMO	5	III - V, 5 (all)	5 (all)	Q	Should the MS report just the indicator Count or Sum or also for the Sub-Indicators, especially in the case where the MS has not completed all the datasets and services under review?	MS shall calculate and report on both the Indicator and Sub-Indicators	see n°62	see n°62

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89	Swedish Environmental protection Agency	LMO	3	5.4, 6.4, 8.4, 9.4, 10.4, 11.4		T	For some indicators the only possible value for MS to register is 0 or 1. This information can be misleading, a value in between could be of interest to inform to what extent data is conformant with the requirements of the Directive. For example it is interesting to know to what extent data are conformant with the data specifications at special date, especially in the first reporting cycle.	Include a value that permit MS to indicate to what extent their data etc. are conformant with the Directive and the implementing Rules.	The IR MR provides a general overview of the conformity, at the level of the series. With the answer Yes or No to the conformity, it is possible to know if the data sets/services can be used. It will be difficult to use an infrastructure "partly conformant" (it will also be difficult to define "partly conformant"). In the IR MD, the element "degree of conformity" can be : conformant, not conformant, not evaluated ("not conformant" and "not evaluated" will be "0").	Justification document: add an explanation on why 0/1 is enough. Guidelines: develop a paragraph about the conformity
37	Royal Netherlands Meteorological Institute (KNMI)	LMO	1	-	-	G	The approach that each Member State does its own reporting based on 'conformance', while 'conformance' is not well defined introduces the risk of different interpretations of 'conformance'. This will introduce serious Quality Assurance problems, as you cannot compare reports from Member States. It also makes it impossible to summarize all results into one report for EU.	Clearly define 'conformance' and how this is measured. Built or arrange automated tools for conformance indication and provide these to the Member States. In this way each member state will measure conformance in the same way.	The IR MR proposes to monitor the conformity but it is not the scope of the IR MR to define how the conformity is evaluated.	Guidelines: add an explanation on how MSs could evaluate the conformity (e.g. use of conformance testing)
40	Royal Netherlands Meteorological Institute (KNMI)	LMO	4	-	-	G	The approach of using '0' or '1' for conformance makes it hard to show progress.		see n°89	see n°89
42	Royal Netherlands Meteorological Institute (KNMI)	LMO	6	-	-	G	Who will pay for the reporting and monitoring efforts?		It is the responsibility of MS to report and monitor and to pay the cost of it.	No action
43	Royal Netherlands Meteorological Institute (KNMI)	LMO	7	-	-	G	The Monitoring and Reporting pilot (MORE) reports a set of recommendations, regarding the spreadsheet, indicators and possibilities for automation. These are not taken into account in this document. See report: Report title: 'Monitoring Feasibility Test Report - Country The Netherlands', identifier NL_Report_feasibilityTest_v2.doc, date 2007-09-28	Please take into account the recommendations of the MORE monitoring and Reporting pilot.	The DT MR has taken on board the as much as possible the recommendations compatible with the general approach adopted for the proposed Implementing Rules: -in the IR MR -in the guidelines.	No action
301	Met Office	LMO	MetO04	2	all	G	The MRDT have restricted the instructions to MS, but we have looked in the scope for advice as to how the MS responsibilities might be cascaded down to LMOs. This is missing.	We feel that the MRDT should have given advice, as opposed to instruction how the reporting should be distributed down to LMOs. As the comments are addressed to LMOs and SDICs, our roles are unclear.	see n°314	see n°314
Chapter I									0	
221	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	7	I	title	E	Clarification	Change "SUBJECT MATTER" to "OBJECTIVE"	Accepted	IR: change the title of chapter I
66	National Land Survey of Finland	LMO	1	1.1.		G	Implementing rules are compiled on countable measures of implementation missing the point as regards user needs and user orientated evolution in future.	Add measures or indicators for fulfilment of user requirements.	The proposal is interesting but it is out of scope of IR MR.	No action

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222	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	8	I	1.1	E	Clarification	Omit ". This is required" (instead you can join the sentences:"...is required as input for...")	Accepted	IR: change the sentence
228	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	14	I	1.1	G	There is no detailed reference to the INSPIRE Directive.	In sentence 1 Directive to add: "2007/2/EC of the European Parliament and the Council.	The final version will be conformant with EC editorial rules (the IR MD can be used as a model).	IR: follow the EC editorial rules (the legal services of the EC will do it)
333	Czech Office for Surveying, Mapping and Cadastre	LMO	1 to 15	I - 2	2	E	Quotation from the Directive should be marked by quotation marks.		see n°228	see n°228
277	AGI - Association for Geographic Information	SDIC	6	I	2.1	E	Repetition of "implementing rules"	"This document sets out the implementing rules...."	Accepted	IR: change the sentence
278	AGI - Association for Geographic Information	SDIC	7	I	2.1	E	Rephrase "in line with" to give a more precise meaning	Change to, "in conformance with"	Accepted	IR: change the sentence: "in line with" is replaced by "in accordance with"
279	AGI - Association for Geographic Information	SDIC	8	I	2.1	E	Second sentence - replace "will be", should be the present tense.	Change to "are"	Accepted	IR: change the sentence
280	AGI - Association for Geographic Information	SDIC	9	I	2.2	E	Recast the first sentence	"In accordance with Article 21(2) of the Directive, these implementing rules define the method of reporting on the coordination of public sector providers and users of the infrastructure, the relationship.....(etc)"	Accepted	IR: change the sentence
281	AGI - Association for Geographic Information	SDIC	10	I	2.2	E	the contribution made by public authorities or third parties to the coordination and functioning;' - of what?	Clarify phrase	Accepted	IR: change the sentence
223	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	9	I	2.1	E	Clarification	Add "... the Member States' infrastructure ..."	Accepted	IR: change the sentence

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224	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	10	I	2.2	E	Clarification	Add "... 21(2) and 21(3) of the Directive, ..."	Accepted	IR: change the sentence
225	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	11	I	2.2	E	Clarification	Add "... users of the Member States ' infrastructure ..."	It is a copy-paste of the Directive: delete it, refer to the articles.	IR: delete the sentence
226	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	12	I	2.3	E	Clarification	Change to "These implementing rules define the methodology used to define and calculate the indicators and sub-indicators which shall be used by Member States to monitor the implementation of the Directive, as well as the raw data needed and the way to calculate these indicators. "	Accepted	IR: change the sentence
183	Institut Géographique National	LMO	1	I.2.4.	Last sentence	T	The last sentence states that the present document does not address the issue of how the results of the monitoring process will be made public. The reader might like to know where he/she can find guidelines on this issue	"How this should be done, is not defined in this Implementing Rule, but is the object of document xxxxxxxx, to be published in xxxxxxxx."	The IR MR will not explain what is not in the legal text : the last sentence is deleted.	IR: delete the last sentence
227	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	13	I	2.4	E	Clarification	Change to "... The results of the monitoring process shall also be made permanently available to the public by the Member States, as laid down in CHAPTER VII . How this should be done, is not defined in this Implementing Rule. "	The wording of the sentence must be consistent with the Directive (make a copy-paste).	IR: copy-paste the sentence from the Directive.
DEFINITION										
334	Czech Office for Surveying, Mapping and Cadastre	LMO	2 to 15	III - 3		G	We would appreciate unification of the terminology across all IR.		The unification is under the responsibility of the CT.	Cross-checking of the consistency of the used terminology will be made during the conversion of the Implementing Rules into a formal Regulation

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229	Lenkungsgremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	15	II	3	E	Clarification	Add "The definitions of Article 3 and Article 11 ..."	The reference to all the definitions of the Directive (not only from Article 3) has to be included in the IR MR.	IR: modify the first sentence of article 3.
230	Lenkungsgremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	16	II	3	E	Clarification	Add "For the purpose of these implementing rules, the following additional definitions shall apply."	Accepted	IR: modify the sentence
271	Lenkungsgremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	57	II.3/guidelines		T	The definitions are not sufficient. E.g. "conformity". The definition does not enable the user to clearly apply it to the monitoring. A reference to the Directive IR needs to be precisely given. This is also missing in the guideline document.	Guideline document: a very short rationale about the indicators is presented, but a limited list of criteria is needed to implement. We understand the meaning of softening attributes such as "sufficient quality" and "necessary information", but some more detail should be included. At least, accurate links to the DT reports or IR should be added where possible.	It is not possible to provide a more detailed definition of "conformity": the IR MR can only refer to the Directive and to the IR MRs.	Guidelines: explain the meaning of "conformity", refer to the conformance testing
351	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	4	II.3/guidelines		T	The definitions are not sufficient. E.g. "conformity". The definition does not enable the user to clearly apply it to the monitoring. A reference to the Directive IR needs to be precisely given. This is also missing in the guideline document.	Guideline document: a very short rationale about the indicators is presented, but a limited list of criteria is needed to implement. We understand the meaning of softening attributes such as "sufficient quality" and "necessary information", but some more detail should be included. At least, accurate links to the DT reports or IR should be added where possible.	see 271	see 271
75	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	1	II.3	accessibility	e	use correct definition syntax :	ability to be reached,....	"Accessibility" is now the name of the indicator, the definition is provided through the definition of the indicator (see 2nd paragraph of the article).	IR: delete the definition of "accessibility" - rewrite the 2nd paragraph of article 10
184	Institut Géographique National	LMO	2	II.3	Definition of Accessibility	T	For the definition of "Accessibility", the fact that the "something" is accessible "typically (...) prior to use" is to be mentioned indeed, but not as a decisive criterion of "accessibility"	"The quality of being accessible i.e. able to be reached, entered, influenced, understood (e.g. prior to use) and, under certain conditions, processed"	see n°75	see n°75

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231	Lenkungsgremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	17	II	3 Table Accessibility	E	Clarification	Change to "The quality of something (e.g. a dataset or a service) being accessible i.e. able to be reached, entered, influenced or understood which may typically be prior to use. Accessibility is used in the sense of something being accessible over the web."	see n°75	see n°75
309	Met Office	LMO	MetO12	7.4		G	This rules out Atmosphere, Meteorology and Oceanography outside of jurisdictional rights. Although the Directive lists this, the MRDT should have given advice how these are to be dealt with.	Please give advice on how data gathered outside of jurisdictional area should be handled.	Yes, this does rule out Atmosphere, Meteorology and Oceanography outside of jurisdictional rights. Article 4 of the Directive states that the Directive shall cover spatial data sets that "relate to an area where a Member State has and/or exercises jurisdictional rights". This means that any other spatial data managed by the MS, but outside such an area shouldn't be included. It is the responsibility of MS to define the data that are considered falling under their respective jurisdictional rights.	Guidelines may explain how to deal with transnational datasets.
302	Met Office	LMO	MetO05	3	Actual Area	T	This rules out Atmosphere, Meteorology and Oceanography outside of jurisdictional rights. Although the Directive lists this, the MRDT should have given advice how these are to be dealt with.	Please give advice on how data gathered outside of jurisdictional area should be handled.	see n°309	see n°309
306	Met Office	LMO	MetO09	3	relevant area	T	This rules out Atmosphere, Meteorology and Oceanography outside of jurisdictional rights. Although the Directive lists this, the MRDT should have given advice how these are to be dealt with.	Please give advice on how data gathered outside of jurisdictional area should be handled.	see n°309	see n°309
76	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	2	II.3	actual area	t	area is not territory	change term	The wording "actual area"/"relevant area" is kept. An additional term is added ("Maximum area") in order to clarify them. The definitions will be reviewed in order to avoid misunderstanding.	IR: review the definition of "actual area"/"relevant area" Guidelines: improve the explanation of relevant/actual area
163	Instituto Geográfico Português	LMO	1	Chapter II	3	G	Considering these definitions of Areas, there are several areas outside the Member States jurisdiction, with important data sets that are collected by scientific organizations (e.g. meteo services; Polar ice capes monitoring) that will not be covered.		see n°76	see n°76
185	Institut Géographique National	LMO	3	II.3	Definition of Actual Area	T	"for which the Member State has and/or exercises jurisdictional rights (land, sea or land & sea)". Does that mean that data on Oceans are expected only within the Exclusive Economic Zones from the shores, and not further ?	Clarify the interpretation for "exercises jurisdictional rights" (in relation with the definition of "Relevant Area")	see n°76	see n°76

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232	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	18	II	3 Table Actual area	E	Clarification	Change to "That part of the territory (land, sea or land & sea) of the Member State for which the Member State has and/or exercises jurisdictional rights (land, sea or land & sea) and for which a spatial data set is currently providing coverage."	see n°76	see n°76
82	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	8	II,3	relevant area	t	see remark 2		see n°76	see n°76
109	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	13	3	Relevant area	E	see comments # 10, 11 and 12	Delete the reference to Relevant area	see n°76	see n°76
316	Malta Environment and Planning Authority	LMO	2	II,3		E	Relevant Area definition refers to 'future' state. However, future could signify a diversity of issues that are too dynamic to calculate: (eg - urban area designation can change over time to reflect changes in policy, yet the geographical coverage of the MS is more stable. This means that should one compare the actual area vis-a-vis a dynamic area, the resultant indicators will not be comparable over time. Further complications to the current text would be realised should one analyse the sub-categorisations relevant to the particular dataset, such as the different land-use categories)	It would be best to reword the text as follows: delete the following text: "and for which it is foreseen that a spatial dataset will provide coverage in the future".	See n°5	See n°5
188	Institut Géographique National	LMO	6	II.3	Definition of Relevant Area	T	"for which the Member State has and/or exercises jurisdictional rights (land, sea or land & sea)". Does that mean that data on Oceans are expected only within the Exclusive Economic Zones from the shores, and not further ?	Clarify the interpretation for "exercises jurisdictional rights" (in relation with the definition of "Actual Area")	The guidelines will give examples on EEZ.	Guidelines: add an example on Oceans (with EEZ).
234	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	20	II	3 Table Relevant area	E	Clarification	Change to "That part of the territory (land, sea or land & sea) of the Member State for which the Member State has and/or exercises jurisdictional rights (land, sea or land & sea) and for which it is foreseen that a spatial data set will provide coverage in the future."	see n°76	see n°76
77	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	3	II.3	arrangement	e	provide single definition + use correct definition syntax	adapt definition	The final definition of arrangement will be reviewed.	IR: clarify the definition.

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150	Ordnance Survey	LMO	1	3		E	Definition of 'arrangement', last line: verb 'license' used as noun	Replace 'license' with 'licence'	Accepted	IR: check the use of licence/license (noun/verb)
186	Institut Géographique National	LMO	4	II.3	Definition of Arrangement	E	inter alia	inter alia (in italics)	Refused , it is not possible to use italic in the write-up of IR MR.	No action
151	Ordnance Survey	LMO	2	3		E	Definition of 'conformant': better to use an alternative word than define a new one	Delete definition of 'conformant' and replace it in the text, e.g. 'are conformant with the requirements' becomes 'conform with the requirements'	Only one word will be used: "conformity" becomes "conformant".The definition of "conformant" is deleted: no need for a definition (as in the Directive).	IR: use conform(v)/conformant(a)/conformance(n) - delete "conformity" - Delete the definition of conformity/conformance
296	Institute of Geodesy, Cartography and Remote Sensing	LMO	1	3		G	Conformity to implementing rules is sometimes not "black or white". Is e.g. metadata conformant if only one metadata element is not filled out? Choosing 0 or 1 can be subjective.	The definition of "Conformity" should be formulated more precisely, possibly separately for metadata, data sets and spatial data services.	The definition of "conformant" as to be checked with ISO 2859.	IR: check the definition of "conformant" with ISO 2859
282	AGI - Association for Geographic Information	SDIC	11	II	3 Conformity	E	This "definition" does not define "Conformity".	Replace with more adequate definition such as "degree of accordance with the requirements defined in the INSPIRE Implementing Rules"	see n*151 and 296	see n*151 and 296
78	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	4	II.3	conformity	t	non ISO definition (see ISO2859 etc)	fulfilment of a specified requirement	see n*296	see n*296
283	AGI - Association for Geographic Information	SDIC	12	II	3 Existence	E	Using the term "exist" in the definition is not helpful (existence = state of existing).	Delete term from definitions.	It is not necessary to define "Existence"	IR: Drop Existence definition
152	Ordnance Survey	LMO	3	3		E	Definition of 'existence': rather an ambitious attempt at a definition which, unfortunately, is circular	Delete definition of 'existence'	see n*152	see n*152
79	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	5	II.3	existence	t	circular definition	adapt definition	see n*152	see n*152
284	AGI - Association for Geographic Information	SDIC	13	II	3 Indicator	E	"Indicator" is not used in the document to mean "distance to target" (i.e. decreasing as one nears the objective). Strictly speaking, it is the wrong word and should be "measure".	Replace with more appropriate definition, such as "measurement of the closeness to the specified objective"	The definition of "indicator" is not consistent with the way it is used in the IR MR (check with ISO 5725).	IR: Check with ISO 5725 and decide if keeping or deleting Indicator definition - Make the same inquiry for sub-indicator
303	Met Office	LMO	MetO06	3	Indicator	T	In fact not a single indicator "measures distance to target". You have not stated that the target everywhere is 1 or 100%, and distance to target should be (1- indicator).	The indicator is a measurement of completeness of the task, and all indicators aim at a value of 1.0 or 100%.	see n*284	see n*284
80	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	6	II.3	indicator	t	is not a measurement, what is stated relates more to "trueness" (ISO 5725)	adapt definition	see n*284	see n*284

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187	Institut Géographique National	LMO	5	II.3	Definition of Indicator	T	The "measurement of the distance to target" yields 0 when the target is reached, and yet the proposed indicators would give 100%. The definition here should be changed.	"Measurement of progress towards target for a well-defined objective"	see n°284	see n°284
285	AGI - Association for Geographic Information	SDIC	14	II	3 Raw Data	E	Not English. Not clear what it means. Does it mean information collected by a stakeholder for the purposes of deriving indicators? The prefix "raw" is not required in the context where the term is used. The data may or may not be "raw".	Either change definition to: 'Data collected by stakeholders for the purpose of calculating monitoring and reporting indicators', or else delete term from definitions list and replace with "data" where used in the text.	Accepted. Clarify/change the term	IR: delete the definition for raw data - change "raw data" in "data" Guidelines: add a paragraph on the use of indicators and targets - change "raw data" in "data"
81	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	7	II.3	raw data	t	indicator here are calculated in contraction with its definition	use Iso definition	see n°285	see n°285
126	General Administration of Patrimonial Documentation	LMO	1	II, 3	Table 1	G	Raw data : the definition is not clear. Who will define precisely "raw data" and when ?		see n°285	see n°285
131	FPGI / PFIG - Federaal Platform voor Geo-Informatie / Plate-forme Fédérale de l'Information Géographique	SDIC	1	II, 3	Table 1	G	Raw data : the definition is not clear. Who will define precisely "raw data" and when ?		see 285	see 285
304	Met Office	LMO	MetO07	3	raw data	T	Although this restricts the meaning of "raw data" to raw monitoring data, because all the rest of the IRs are using raw data in a different manner this use of raw data is confusing across the IR.	use raw monitoring data instead of raw data. (Or component data as opposed to indicators or summary data)	see n°285	see n°285
305	Met Office	LMO	MetO08	3	raw data	E	poor English	Information collected by stakeholders in order to calculate indicators.	see n°285	see n°285
153	Ordnance Survey	LMO	4	3		E	Definition of 'Raw data': meaning not clear	Replace 'in view of' with 'with a view to'	see n°285	see n°285
233	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	19	II	3 Table Raw data	E	Clarification	Change to "Information to be collected and transmitted by any stakeholder in view of calculating indicators."	The publication is specified in chapter VII, not in the definition.	IR: Check the transmission in Chapter VII
238	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	24	II	3 Table	E	Possible misunderstanding of term in the context of GDI	Change term "Raw Data" into e.g. "Tabular data" or "Factual Data"	see n°285	see n°285

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28	Geonovum	LMO	10	II, 3		T	Definition of 'service request' is not specific, which may lead to incomparable results for indicator NSi4.	Refer to definitions within IR for services.	The "Service request" is defined in the appropriate NS Implementing Rules	no action
83	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	9	II.3	service request	t	specified is not requested	adapt definition	see n°28	see n°28
235	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	21	II	3 Table Service request	E	Clarification	Change to "Operation specified by a service and actually requested by a client."	see n°28	see n°28
4	CNIG-Conseil national de l'information géographique	LMO	1	4.1		G	The INSPIRE IR WP2007-2009-V1 0.doc document exposes, in 4.5.2, "The monitoring indicators should be derivable as much as possible from the applications and services that are set up, in order to facilitate a continuous monitoring process with marginal overhead." This draft IR gives no mention of such derivation	Complete the II-4-1 : "A monitoring mechanism shall be set-up by the Member States to collect raw data from all the appropriate stakeholders at various levels of public authority. It should be derivable as much as possible from the applications and services that are set up, in order to facilitate a continuous monitoring process with marginal overhead. The raw data collected shall be used to calculate the indicators of these implementing rules for each Member State at the national level.	The IR MR defines the requirements of MS, not the way to reach them. The guidelines will provide help to MS, including elements to facilitate the monitoring and reporting.	Guidelines: Develop paragraph 2 (how to collect data)
189	Institut Géographique National	LMO	7	II.4.1	First sentence	E	shall be set-up	shall be set up	Accepted	IR: change the wording
236	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	22	II	4.1	E	Clarification	Add "... to calculate the indicators and sub-indicators, ..."	Accepted	IR: change the sentence
143	Department for Environment, Food and Rural Affairs (Defra)	LMO	5	4	Paragraph 2	E	Should it not state Article 11(1)(a-e), as opposed to Article 11(1)(a)?	Article 11(1)(a-e)	Accepted	IR: change the sentence
190	Institut Géographique National	LMO	8	II.4.4		T	even if the aim is to be compliant to the directive for a defined data, it can be useful to indicate the target value and the target date to follow the progress.	f. target value at the specific date	The target values and the target dates could be added in the guidelines, not in the IR MR.	Guidelines: develop a paragraph on the interpretation of indicators - add a calendar with all the dates
METADATA									0	

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68	National Land Survey of Finland	LMO	9	1.3., 2.2.		G,T	IR should include monitoring of up to date status of unique identifiers in Member States by annex themes or data set as applicable because in cross-border information use it is essential to user to be aware of the conditions in another country concerned.	Include monitoring of up to date status of unique identifiers in IRs.	The "up-to-dateness status of unique identifiers" is a specific topic about the conformity of spatial data sets. It is not acceptable to have a specific indicator for that, even it is important for cross-border use.	No action
354	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	7	III.5		T	It is not made clear if the quality and completeness of the metadata is important, or whether just the mandatory metadata is sufficient.	please consider and clarify	The IR MR will monitor the conformity of MD, according to IR MD (mandatory elements).	No action
23	Geonovum	LMO	5	5.3		T	Each spatial dataset will be served as an spatial data service. That means that there have to be consistence about the existence between the spatial datasets and the spatial data services.	Or combine MDi11, MDi12 and MDi13 to 1 indicator or separate MDi14 to three indicators.	A spatial data service is not necessarily linked to a spatial data set. There are also indicators on services (see NSi1n, NSi2n). The sub-indicators about data sets are always separated according to the annexes because the deadlines are different in the Directive.	IR: analyse the validity of the sub-indicator MDi14
6	CNIG-Conseil national de l'information géographique	LMO	3	5		G	The metadata indicator is based on two series of counts : 1. the counts of spatial data sets and services 2. the counts of those for which metadata exist. The first is difficult to compute because a part of these sets are non in electronic format and not concerned by INSPIRE. The second is out of reach. In fact, given the large number of likely contributors (around 40.000 for France), the only practice mean of identifying the spatial data sets and services is to ask the contributors to declare their data sets and services on a website. That entails that only sets of data (and services) for which metadata exist (however incomplete they may be) can be identified. Therefore the indicators as defined in section 5.5 will allways have the value 1.	Consider the number of metadata reachable via discover services as the indicator MDi1. See comments 4 to 9	<u>About the list (the count of spatial data sets and services):</u> "a part of these sets are non in electronic format and not concerned by INSPIRE" : yes, indeed, only electronic data sets are relevant for INSPIRE. <u>About limiting the indicator to data sets with MD:</u> The scope of INSPIRE isn't limited to discoverable data sets. INSPIRE covers existing data sets, according to Article 4, and requires the creation of metadata for data sets entering into the scope of INSPIRE. It is the responsibility of MS to decide which data sets are in, which are out. It is also up to the MS to group similar data sets into a series (see n°2)	Guidelines: explain how to deal with large numbers of data sets (see n°2)
98	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	2	5		G	<i>The metadata indicator is based on two series of counts : 1. the counts of spatial data sets and services 2. the counts of those for which metadata exist. Unfortunately, the first count, as it is defined, is practically unreachable, given the large number of likely contributors (around 40.000 for France). In fact, the only practice mean of identifying the spatial data sets and services is to ask the contributors to declare their data sets and services on a website, that it to say pass on the corresponding metadata so that they can be accessed by a discovery service. That entails that only sets of data (and services) for which metadata exist (however incomplete they may be) can be identified. Therefore the indicators as defined in section 5.5 will always have the value 1and will not be of any use.</i>	Consider the number of metadata as counted by a discovery service as indicators Mdi1x. See comments 3 to 9	see 6	see 6

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317	Malta Environment and Planning Authority	LMO	3	III, 5	5	T	Would this be valid should an MS not have or not plan to have a specific dataset (for example Malta does not have a cadastre). The indicator will give a high result for those countries that have say 10 metadata 1 (raw data) for the only 10 datasets they have. In effect some countries will gauge higher on reporting when in reality, they do not have all the datasets.	a to e should be changed to:"divided by the total number of datasets listed in Annex..."	The situation is allowed by INSPIRE. There is no obligation to cover all the themes (only existing data are relevant). Explanations will be added in the guidelines; the empty themes are not monitored.	Guidelines: explain what occurs for empty themes
191	Institut Géographique National	LMO	9	III.5.1	First sentence	G	"shall ensure that metadata are created for each of the spatial data sets." Is that all? Shouldn't there be metadata also for data series?	Clarify whether metadata are expected also for dataset series	See n°2	See n°2
192	Institut Géographique National	LMO	10	III.5.1		T	"Metadata shall be kept up to date". Is there a particular reason to evaluate this specific field, because there is no corresponding indicator.	delete or develop	This sentence isn't needed (it was a copy-paste of the Article of the Directive)	IR: modify the sentence
240	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	26	III	5.2	E	Clarification	Change to "Member States shall monitor the existence of metadata (MD1). This indicator measures the extent to which metadata for the spatial data services and the spatial data sets of the themes corresponding to the themes listed in the Annexes of the Directive exist.	Not accepted	No action
7	CNIG-Conseil national de l'information géographique	LMO	4	5.3	paragraph a	E	see comment 3 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
8	CNIG-Conseil national de l'information géographique	LMO	5	5.3	paragraph b	E	see comment 3 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
9	CNIG-Conseil national de l'information géographique	LMO	6	5.3	paragraph c	E	see comment 3 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
10	CNIG-Conseil national de l'information géographique	LMO	7	5.3	paragraph d	E	see comment 3 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
99	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	3	5.3	paragraph a	E	see comment #2 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
100	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	4	5.3	paragraph b	E	see comment #2 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
101	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	5	5.3	paragraph c	E	see comment #2 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action
102	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	6	5.3	paragraph d	E	see comment #2 above	replace « existence of metadata » by « number of metadata »	Not accepted (see n°6)	No action

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105	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	9	5.3		E	see comment #2 above	Add the following text at the end of section 5.3 : « Any reference to the number of spatial data sets (services) shall be meant as the number of data sets (services) as counted by indicators Mdi1x.	Not accepted (see n°6)	No action
243	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	29	III	5.3 d)	G	What means in this topic "spatial data services"?	Clear designation, which services are meant at this point.	This is the terminology of the Directive (Article 3.4).	No action
244	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	30	III	5.3 ff	G	Meaning of term is misleading. A sub-indicator is deducated from an indicator. The definition of the sub-indicator shows that these data are not deducated but are the original indicating data	Change term "sub-indicator" into "indicator" and term "indicator" into e.g. "indicator group"	Sub-indicators (using that word or another one) are not used to calculate indicators but they monitor a sub-set of information. A n unambiguous term has to be find. No need for a definition: it is clear as it is used in the IR. See also n°284	IR: no need of definition for "sub-indicator" - Need a new term for it: detailed indicator. See also n°284
11	CNIG-Conseil national de l'information géographique	LMO	8	5.4		E	see comment 3 above	Delete section 5.4	Not accepted (see n°6)	No action
103	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	7	5.4		E	see comment #2 above	Delete section 5.4	Not accepted (see n°6)	No action
194	Institut Géographique National	LMO	12	III.5.4		T	there are three levels of metadatas. The level of metadata measured must be specified otherwise member states might choose differents levels.	impose the level or ask to the member states to express the level monitored	The level of MD is out of scope of IR MR (there is no "level" in IR MD).	No action
12	CNIG-Conseil national de l'information géographique	LMO	9	5.5		E	see comment 3 above	Delete section 5.5	Not accepted (see n°6)	No action
24	Geonovum	LMO	6	5.5		T	see comments 5.3	see comment 5.3	see n°23	see n°23
104	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	8	5.5		E	see comment #2 above	Delete section 5.5	Not accepted (see n°6)	No action
155	Ordnance Survey	LMO	6	5.5		T	In each case the count of spatial data sets that have metadata is to be divided by the number of spatial data sets. It will not be possible in practice to determine how many datasets exist for which there is no metadata.	Just rely on a simple count?	See n°35	See n°35

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241	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	27	III	5.5 e)	G	Indicator MDi1 should not mix Data sets and Data services.	Define <u>two</u> indicators: One for Data Sets and one for Services. As MDi14 already exists, this can be done without extra effort.	No : INSPIRE requires the creation of MD for spatial data sets and services. That is why it is interesting to know the total number of MD. The sub-indicators give information on the different components (the sub-indicators will be published).	No action
308	Met Office	LMO	MetO11	5.5	and all subsequent sections on sub-indicators	T	What is to prevent dataset granularity from being misused to "hedge" these indicators? For example we have many very similar datasets for which we could create very similar metadata e.g. individual meteorological station data. 1000 such datasets might be conformant, while all the other dataset are not, but we group them into all atmospheric data, and all oceanographic data - 2 datasets. so 1000/1002 is nearly totally conformant, but only 0.0001% by data volume.	Please give advice on best practice so as not to invalidate these indicators.	MS could group similar data sets and consider it as a series. Additional explanation will be provided in the guidelines (see n°2)	see n°2
154	Ordnance Survey	LMO	5	5.3 (also 6.3, 7.3, 8.3, 9.3...)		E	Indicators are described as 'supplemented' by sub-indicators; it would be more accurate to say that indicators are 'built up from' sub indicators	Replace 'supplemented with more suitable word or phrase: 'built up from', or 'compiled from'	"Supplemented" is correct (see n°284 on the wording of indicator/sub indicator)	No action
69	National Land Survey of Finland	LMO	3	6.,9.		G	Quality aspects on usability of metadata services should be considered as for accessibility and intelligibility of metadata presentation e.g. many metadata elements are not very understandable even for experienced spatial data users, transparency of data collection or update process to casual or ad hoc user etc.	MonitoringReporting	It is difficult to measure the quality of MD: no indicator is proposed for that purpose.	No action
156	Ordnance Survey	LMO	7	6.5, 7.5, 8.5 . . .		T	Following the reasoning in 5.5, the denominator ought to be the number of datasets for which metadata exist	Add the words ' for which metadata exist'	No: the IR MR always refers to data sets that exist (it is the objective of INSPIRE to build an infrastructure based on existing data sets). An explanation will be added in the justification document.	Justification document: add an explanation on the reference used in the ratio (denominator)
160	United Kingdom Hydrographic Office	LMO	1	Ch III - 5 & 6 - Monitoring the existence and conformity of metadata	5.4 and 6.4	T	The existence of metadata for a spatial data set and the conformity of that metadata may not simply equate to yes (1) and no (0). Many data sets have partial metadata which may also be partially conformant e.g. during an extended period of metadata creation for a large data set. There may be a case for some gradation which more accurately reflects the state of the metadata e.g. 0, 20, 40, 60 ... % or 0, 50, 100% existence/conformancy? Or maybe this becomes too subjective and too complicated hence producing misleading statistics?		see n°89	see n°89

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22	Geonovum	LMO	4	Chapter III		G	This conformity is a high level test. Could be worked out more explicitly, like the mappings of Metadata, outside the IR. An example could be (based on Annex J of metadata IR version 2). Then you know more in detail where the conformity is available and where not.	For example: Metadata packages, classes, attributes and relationships will hereafter be called metadata elements. 1 Conformance requirements In order to be in conformance with the Implementing Rules for metadata, metadata shall be provided as specified in the IR Metadata. Any metadata claiming conformance with these Implementing Rules shall pass the requirements described in the abstract test suite presented in 3. 2 Obligation and condition For the purposes of conformance testing using the abstract test suite in 3, metadata elements shall be considered to be mandatory, conditional or optional as specified in section 3.1. 3 Test suite The completion of this test ensures that the rules specified in these Implementing Rules have been applied. The test suite comprises of several different tests, and these tests shall be described in the following clauses. 3.1 Completeness test a) Test Purpose: to determine conformance by the inclusion of all metadata elements that are specified with an obligation of "mandatory" or mandatory under the conditions specified. NOTE: Many elements designated as mandatory	see n°37	see n°37
136	National Survey and Cadastre, Denmark	LMO	1	Chapter 3	Paragraph 5	T	Could be considered if the use of only quantitative parameters could be enhanced with the use of coverage. This would make it more "valuable" to have metadata for large dataset available, instead of large and small datasets having the same weight.	Multiply the count of the spatial data sets with the decimal value of the territory they cover. This proposal can be used for several of the following indicators in the IR.	Weight is already used through the data sets that are declared in several themes. No other weight is used (too complicated)	No action
137	National Survey and Cadastre, Denmark	LMO	2	Chapter 3	Paragraph 5	E	We would like to propose a structural change, to accommodate the understanding of the rules, as well as making the legal implementation simpler. In the proposal each individual paragraph explaining the indicators have five sub paragraphs, mixing background, measure and statistical collection	It is suggested that only subparagraph 1 and 2 are kept in the main document, and subparagraph 3, 4 and 5 are moved to an annex, since they are the explanation of the technical requirements for each indicator. It is furthermore suggested to merge subparagraph 3 and 5, so that the explanation of the subindicators and the actual measure follow each other.	The structure of article is kept as it is. At the end, the DG ENV will decide what is the legal one.	No action
165	Instituto Geográfico Português	LMO	3	Chapter III	5.3.	E	The Notation used for the indicators is not clear and can be tricky.	Maybe a notation that better differentiates the items e.g. MDiX.Y MDi1 (existence) - MDi1., MDi1.2, MDi1.3 for the three annexes and MDi1.4 for the services; MDi2(conformity)MDi2.1, MDi2.2, MDi2.3 for the Annexes and MDi2.4 for the services The same approach in terms of notation should be followed for the other indicators.	The notation will be reviewed to make it more easy to read.	IR: modify the notation to make them more easy to read.
46	Royal Netherlands Meteorological Institute (KNMI)	LMO	10	III	6	E/G	At point 4: 'For each spatial data set whether (value 1) or not (value 0) metadata are conformant with the implementing rules for metadata.' How is the conformance calculated?	Please provide guidance on how to calculate 'conformance'. Clearly define this so each Member State will use the same method.	see n°37	see n°37
287	AGI - Association for Geographic Information	SDIC	16	III	6.4	T	How is conformance of metadata for a data set to be determined? There are no conformance tests specified in the Metadata IR.	Clarify definition of conformant metadata.	see n°37	see n°37
111	CTC-RW - Comité Technique de Cartographie de la Région wallonne	SDIC	1	Chapter III, Part 6 Monitoring the conformity of metadata		T	does conformity mean 100% and not conform mean 0%?	What about x % conform metadata = 0 or a ratio ?	see n°89	see n°89

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318	Malta Environment and Planning Authority	LMO	4	III,6	4	T	What does conformant mean? Full conformity - all elements are filled in?	Need to clarify level of conformity. Does a dataset or data service with 90% completed metadata elements get a 1? Technically it gets a 0, however one can use the system adopted in the EEA EIONET smiley system that is based on no-partial-full conformity. This complicates the indicator calculation but it reflects the reality of quasi-conformity most countries will encounter.	see n°89	see n°89
338	Czech Office for Surveying, Mapping and Cadastre	LMO	6 to 15	III - 6	2	Q	Conformity of metadata with IR will probably be stated via validation test. Will this test be created in JRC or will it be solved on the member state level?		see n°37	see n°37
13	CNIG-Conseil national de l'information géographique	LMO	10	6.2		E	the 6.3 §b & d should lead to a manual validation of data sets and services. Huge numbers of control of conformity will follow, with heavy charge and delay, congestionning the evaluation of INSPIRE.	Complete the 6.2 : " It will be derivable from the applications and services that are set up."	The IR MR fixes the requirement for MS, not how to do it. Guidelines will provide explanation on the possibility of using tools, on the use of MD... (see n°141 and 88)	see n°141 and 88
25	Geonovum	LMO	7	6.2	Monitoring the conformity of metadata	G	How the conformity of metadata will be checked? It seems difficult to do it for all datasets.	Develop kind of validator tool that would check if metadata according to metadata template exist.	Several tools already exist: the editor developed by the JRC is available, including tests for XML file ; there is also an editor developed for the project SDIGER...). Elements will be added in the guidelines - see n°37	see n°37
157	Ordnance Survey	LMO	8	6.4		G	The 'yes/no' decision is rather crude, and may not be helpful in monitoring change	Conformity could be expressed as a percentage or decimal, or (with more difficulty) broken down into components	see n°89	see n°89
356	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	9	III.6.5		T	Conformity cannot be assessed without a list of criteria, against which the actual implementation of the Data Specification IR can be checked.	Add a clear list of conformity criteria, taken e.g. from the DT Data Specification	see n°37	see n°37
242	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	28	III	6.5 e)	G	Indicator MDi2 should not mix Data sets and Data services.	Define <u>two</u> indicators: One for Data Sets and one für Services. As MDi24 already exists, this can be done without extra effort.	see n°241	No action
DATA SETS									0	
112	CTC-RW - Comité Technique de Cartographie de la Région wallonne	SDIC	2	Chapter IV, Part 7 Monitoring the extents of spatial data sets		G	Does the European Commission proposed a single framework to gather national indicators coming from more than one authority level ?	otherwise, if there is more than one relevant authority for a data set, could we consider that any ponderation method is a solution which could be implemented ?	There is no weighting. It is up to the MS to manage the list of data sets/ series that would follow INSPIRE.	Guidelines: add an explanation on how to deal with multiple stakeholders for a data set.
114	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	1	7		G	There are different timetables for datasets depending on the "type" of dataset; newly collected/reconstructed and other spatial datasets. Is there a need to make a note about type of dataset?		The IR MR will not make a distinction between the two types of data sets. It is up to the MS to report on that topic if necessary.	No action

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173	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	1	7		G	There are different timetables for datasets depending on the "type" of dataset; newly collected/ reconstructed and other spatial datasets. Is there a need to make a note about type of dataset?		see 114	see 114
144	Department for Environment, Food and Rural Affairs (Defra)	LMO	6	7	Paragraph 4	T	This relates to comment ID 2. One of the metadata elements for spatial data sets in the proposed metadata regulation is Geographic bounding box (4.1), which defines the extent of the (data) resource in the geographic space. Is that synonymous with the definition of area in the Monitoring and Reporting IR?	Clarify.	No: the actual area and the relevant area are not the geographic bounding box of the IR MD. (see n°76)	Guidelines: explain that the actual/relevant areas are not the Geographic bounding box of the IR MD.
158	Ordnance Survey	LMO	9	7		T	This indicator, while useful to Member States, should not be mandatory since the Directive does not require collection of new data	Explain that this indicator is not mandatory	The "relevant area" doesn't mean that there is an obligation to create new data. The guidelines and the Justification document will be improved.	Guidelines: improve the explanation of "relevant area" Justification document: review the explanation of this indicator
29	Geonovum	LMO	11	IV,7		T	Existence of a data set is now defined as area covered related to relevant area. For some data sets other dimensions might be relevant, e.g. 'time frame covered' (temporal data) or 'level of detail covered'.	No proposal. Adjust in the future when necessary, in line with data definitions.	The IR MR proposes to use the geographic extent, which seems much adapted to the scope of INSPIRE MR.	No action
3	GMFS - ESA GSE Global Monitoring for Food Security	SDIC	3	IV.7	5	T	Should this performance indication for each dataset (ie the % of territory covered) not be averaged across the datasets instead? Example: dataset A covers (hypothetically) 5km ² of territory, with 100km ² of relevant territory (ie 5% territory coverage) that should be covered. Dataset B is similar and covers 6km ² of the same amount of relevant territory (ie 6% coverage). Using the presented formula, one would sum the actual coverage (5+6) over the datasets and divide that by the sum of the relevant territory (100+100), which is 11/10000. However, a better indicator would be to average the % coverages over the datasets (ie average coverage % of the datasets of member state X is 5.5%).	Do not divide sum(actual) by sum(relevant), but rather do sum (actual divided by relevant) and possibly divide that by the number of datasets for normalization (similar to the other indicators, which are also immune to the number of accounted datasets). In other words, go from sum(actual) / sum (relevant) to avg (actual / relevant). I think this is what is intended and the wording is simply incorrect or open to misinterpretation and hence needs to be clarified.	Both approaches have been evaluated, but the chosen approach reflects the concern more precisely. For details see the justification document.	Will be further clarified in the justification document.
288	AGI - Association for Geographic Information	SDIC	17	IV	7.5	T	This sub-indicator is given as the "Sum of the actual areas covered by spatial datasets for Annex ..". This implies that all that is required is that every part of the relevant area is covered by at least one dataset from within the whole of the Annex themes. Is this what is intended?	Clarify requirement.	No: each area (actual/relevant) is linked to a data set. The guidelines will be improved (see n°141)	see n°141
47	Royal Netherlands Meteorological Institute (KNMI)	LMO	11	IV	7	G	Relevancy of this indicator is not clear to us. An indicator per data set has a possible value as indicator. But the sum over all data sets does not provide relevant information.	Please explain why this is measured or remove the indicator	This indicator gives an overview of the development of INSPIRE: additional explanation will be added in the Justification document.	Justification document: add an explanation on the relevancy of that indicator
48	Royal Netherlands Meteorological Institute (KNMI)	LMO	12	IV	8	E/G	How is 'conformance' measured?	Please provide guidance on how to calculate 'conformance'. Clearly define this so each Member State will use the same method.	See n°347 - 89 - 37 - 271	See n°347 - 89 - 37 - 271

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247	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	33	IV	7.5 a to c	G	The definition of "Sub-indicators" in that meaning would be a sum of all areas covered by spatial data sets of Annex I, II, or III without a distinction of themes! That can not be ment.	Change definition into "Sum of the actual area coevered by spatial data sets for each theme for Annex I, divided..."	see n°3	see n°3
248	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	34	IV	7	G	The definitions of the raw data "actual area" and "relevant area" aren't clear. With the current definition the indicator is only relevant for spatial data sets which are extensive, not selective and cover the whole national area.	Give a clear definitions or delete this indicators.	see n°76	see n°76
161	United Kingdom Hydrographic Office	LMO	2	Ch IV - 7 - Monitoring the extent of spatial data sets	7.4	T	Actual and relevant areas is clear but what about the quality of the data sets covering the actual area? How is this covered? Can poor quality data in one country be fairly compared against high quality data of the same type in another country? Again subjectivity is a problem.		Measuring the quality is out of scope of IR MR.	No action
320	Malta Environment and Planning Authority	LMO	6	IV,7	1	E	...contribute to the European... the word contribute should be edited since it sounds like a voluntary activity rather than a required procedure	... are streamlined to the European...	No: the verb "contribute" is adapted.	No action
321	Malta Environment and Planning Authority	LMO	7	IV,7	4	T	For small states km2 is too large. Ha can be more suitable.	change Km2 to Ha	No: the unit used for area is usually Km2 (e.g. publications of Eurostat).	No action
322	Malta Environment and Planning Authority	LMO	8	IV,7	4	Q	How does one calculate the relevant area, particularly where some data layers may be redesignated, (eg. Transport, protected sites, but can be found in all Annexes, particularly Annex III)	Refer to Point 2 above	see n°76	see n°76
323	Malta Environment and Planning Authority	LMO	9	IV,7	5d	T	The Indicator result will prove problematic due to the different number of variables integrated into the calculation. As an example one can argue that an MS that has a 100% actual coverage in the landcover layer and a 10% actual coverage in the cadastre layer, the indicator would give a 55% outcome, which is unrealistic and becomes unreadable when all the extent datasets are calculated.	Another indicator statistical measure is required based on the results emanating from the calculations of Sub-Indicators 5a-c	Additional explanation will be provided in the Justification document.	Justification document: justify the calculation method of DS1
14	CNIG-Conseil national de l'information géographique	LMO	11	7.2		E	See comment 2 above	If proposed change in 15 is not taken in account, complete the 7.2 : " It will be derivable from the applications and services that are set up."	The IR doesn't deal with tools. see n°88	see n°88
26	Geonovum	LMO	8	7.2	Monitoring the extent of spatial data	E	There is some inconsistency in terms names in article 7.2: "...monitor the existence of the spatial data sets (DS i1). This indicator measures the extent of ..."	Be specific. Is EXISTENCE or EXTENT being measured?	The good term is "extent".	IR: use "extent" (instead of "existence") in article 7.3 a-c and in the first sentence of 7.2

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124	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	11	7.2		G	This is a indicator concerning monitoring data production though Inspire, according to article 4.4, do not require that MS produce new data		No: the indicator intends to give an overview of what is or will be in INSPIRE (see n°15)	No action
15	CNIG-Conseil national de l'information géographique	LMO	12	7.3		G	See comment 3 above about the difficult count of spatial data sets.	If proposed change in 15 is not taken in account, consider the number of metadata reachable via discover services as an indicator.	see n°6	No action
16	CNIG-Conseil national de l'information géographique	LMO	13	7.4	paragraph b	G	This section assumes that a « relevant area » can be defined for each data set. Unfortunately, the relevant area of a data set is a relevant concept only if the decision of collecting the data is taken at the national level. For data sets which collection results from a local decision, the « relevant area » cannot be estimated. For example, if we consider orthoimagery, there is a national data set in France (BD ORTHO from IGN) ; in this case, the relevant area is the whole territory. But a local authority (or a government agency) may decide to collect a more detailed orthoimagery for a specific area ; this orthoimagery will be a data set part of the infrastructure and the relevant area for this data set will be the actual area covered by the orthoimagery. In this case, the relevant area and consequently indicatorDSI1 makes no sense.	see comment # 15	This indicator is meaningful (see n°15).	Guidelines: add examples on area (actual/relevant) when "actual area"="relevant area"
106	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	10	7.4	paragraph b	G	<i>This section assumes that a « relevant area » can be defined for each data set. Unfortunately, the relevant area of a data set is a relevant concept only if the decision of collecting the data is taken at the national level. For data sets which collection results from a local decision, the « relevant area » cannot be estimated. For example, if we consider orthoimagery, there is a national data set in France (BD ORTHO from IGN) ; in this case, the relevant area is the whole territory. But a local authority (or a government agency) may decide to collect a more detailed orthoimagery for a specific area ; this orthoimagery will be a data set part of the infrastructure and the relevant area for this data set will be the actual area covered by the orthoimagery. In this case, the relevant area and consequently indicator Dsi1 makes no sense.</i>	see comment # 12	see 16	see 16
18	CNIG-Conseil national de l'information géographique	LMO	15	7.4		G	see comment 13 and 14 above. In addition, considering paragraphs 4.1 and 4.4 of the directive, which make clear that only existing data are covered by the directive and that no collection of new data is required by the directive, the implementing rules should not monitor the collection of new data, because that would go beyond the implementation of the directive.	Delete section 7	The explanation of "monitoring existing data" needs to be developed in the Justification document.	Justification document: Add an explanation on the monitoring of existing data : -why we need an indicator for monitoring the "existence" (two steps: existence then conformity) -why we chose the actual area and relevant area for that indicator and not another data (e.g. nb of data sets)

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108	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	12	7.4		G	see comments 10 and 11 above. Moreover, considering paragraphs 4.1 and 4.4 of the directive, which make clear that only existing data are covered by the directive and that no collection of new data is required by the directive, the implementing rules should not monitor the collection of new data, because that would go beyond the implementation of the directive.	Delete section 7	see n°15	see n°15
17	CNIG-Conseil national de l'information géographique	LMO	14	7.5		G	Given that spatial data sets does not have the same weight (not considering the covered area), some data sets covering a whole theme, others covering only a part of a theme, the division of (sum of areas covered) by (sum of relevant areas) does not seem very relevant. Indeed, this computation would give a much bigger weight to themes which are covered by numerous data sets than to themes covered by only one data set.	see comment # 15	Yes:it has been chosen to be simple Additional explanation will be provided in the justification document.	Justification document: add a chapter on some specific topics defining the methodology
107	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	11	7.5		G	Given that spatial data sets does not have the same weight (not considering the covered area), some data sets covering a whole theme, others covering only a part of a theme, the division of (sum of areas covered) by (sum of relevant areas) does not seem very relevant. Indeed, this computation would give a much bigger weight to themes which are covered by numerous data sets than to themes covered by only one data set.	see comment # 12	see 17	see 17
61	Surveying and Mapping Authority of the Republic of Slovenia	LMO	2	8	paragraph 4	g	Member states should monitor existence and conformity of data sets for themes from Annexes 1-3. The number of data sets and conformity depend on IR for data specifications. Until the date MS should monitor and calculate indicators, only data specifications for data from themes form Annex 1 will be known, others will be available not earlier than the year 2012. More detailed instructions for counting data sets should be prepared.	Guideliness should be more precise.	see n°129	see n°129
324	Malta Environment and Planning Authority	LMO	10	IV,8	4	T	What does conformant mean? Full conformity - all elements are filled in?	Refer to Point 4 above	see n°347	see n°347
339	Czech Office for Surveying, Mapping and Cadastre	LMO	7 to 15	IV - 8	2	Q	How to prove conformity of data set with IR and how to proceed in case the data set corresponds to more themes?		see n°347	see n°347
340	Czech Office for Surveying, Mapping and Cadastre	LMO	8 to 15	IV - 8	5	E	It has not been defined what is the conformity subject.(Generally the IR are unclear, because in some chapters the data should be conform with the service in another case the data should be conform with IR and everything is marked as Conformant.	with IR data specification	The conformity to achieve is referred to in article 8.1.	No action
30	Geonovum	LMO	12	8.3		E	More explicit conformity test are needed in future outside this IR.	Could be part of the IR for data specifications in future.	see n°347	see n°347
196	Institut Géographique National	LMO	14	IV.8.5		T	The ratio between the count of spatial data sets that are conformant and the number of spatial data sets doesn't seem appropriate : the ratio between area could be more appropriate. For example, in France, if a national data base is conformant and a lot of other local data sets covering very small area are not conformant (it could happen because there is 36000 municipalities in France), then the result of the ratio will be very bad.	Use the area or the extent as a weight in the result	No weight is used (explanation in the justification document). A solution is to group similar data sets: see n°308.	Justification document: add explanation on the non-use of weight

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197	Institut Géographique National	LMO	15	IV.8.5		T	these sub-indicators don't evolve regularly. So it will be difficult to act each year, because you don't know if you are late or not!	to add in the reporting section : "Each member state shall provide complementary elements on the result of the monitoring "	Accepted (see n°200)	see n°200
60	Surveying and Mapping Authority of the Republic of Slovenia	LMO	1	7, 8	paragraph 4	g	Indicator Dsi1: "Sum of the actual areas covered by data sets divided by the sum of the relevant areas of all the spatial data sets". Is it meant relevant areas of all existing data sets or also data sets that don't exist yet but should be included in SDI in accordance with IR for data specification? This also refers to indicator Dsi2	Guideliness should be more precise.	see n°5	see n°5
166	Instituto Geográfico Português	LMO	4	Chapter IV	7.4	G	it is not clear when and where the actual and relevant areas for each dataset, should be identified by the Member State.		see n°129	see n°129
84	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	10	V,7	extent	t	term too vague (becomes misleading)	use "thematic" extent	No: see n°29	No action
85	IACS-CAP - Integrated Administration and Control System (Common Agricultural Policy)	SDIC	11	V.8	conformity	t	only one level of conformity? How will conformity be assessed? Is there partial conformity (e.g. Regional?)	clarify link to Data Specification implementing rules	see n°347	see n°347
216	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	2	Table of Contents	entry "CHAPTER IV"	E	Typo	Use lower case letters	Accepted	IR: modify the title
SERVICES										0
21	Geonovum	LMO	3			G	In the whole IR spatial data services is used in chapter V. This is wrong in a way because there will be also general services in that are not directly specific for spatial data. That's way the Directive makes use of network services. It's also confusing because different terms are used in the Directive and in the IR itself.	Make use of network services in chapter V.	The references to Spatial Data Services and Network Services will be clarified	Clear references to Spatial Data Services or Network Services have been introduced
217	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	3	general		G	From user's view it would be helpful to introduce the monitoring indicator "accessibility of spatial data services".		Not accepted. The IR monitors the conformance of services (according to NS IR). The conformance is defined through technical aspects and through performances (see last document from DT NS). One of the criteria of the performances deals with "accessibility". The indicator on Performances is deleted.	Justification document/guidelines: explain what is the conformance of services IR: article 11 is changed in "conformance of services"

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49	Royal Netherlands Meteorological Institute (KNMI)	LMO	13	V	9	E/G	Also here, how is 'conformance' measured?	Please provide guidance on how to calculate 'conformance'. Clearly define this so each Member State will use the same method.	see n°347	see n°347
250	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	36	V	9.5 c)	G	Indicator NSi1 should not mix Data sets and Data services.	Define <u>two</u> indicators: One for Data Sets and one für Services. As NSi11 and NSi12 already exist, this can be done without extra effort.	see n°241	No action
110	Ministère des transports, de l'équipement, du tourisme et de la mer	LMO	14	9		G	As said in comment # 2 above, the only practical mean of identifying a data set is to use a discovery service. In this context, the data sets (services) with conformant metadata that can be counted are necessarily accessible by a discovery service and consequently indicator Nsi1x always have the value 1. This indicator then gives no information.	Delete section 9	see n°6	No action
325	Malta Environment and Planning Authority	LMO	11	V,9	4	T	The reference to conformity of discovery service is vague. A definition for conformity would need to be more explicit. This would also enhance harmonisation in terms of reporting.	Would be practical and useful to include a reference indicating the definition of conformity for "conformant discovery service"	The IR MR always refer to the Directive and the IR NS.	see n°217
341	Czech Office for Surveying, Mapping and Cadastre	LMO	9 to 15	V - 9	1	E	This point is simultaneously the indicator of conformity of services with IR of search services.	I propose to add to IR	The "accessibility" indicator checks if each existing MD is discoverable with a "discovery" service, as defined in INSPIRE. An explanation of the indicator "accessibility" (and not "conformity") will be added in the justification document.	Justification document explain why the indicator is called "accessibility" and not "conformity"
342	Czech Office for Surveying, Mapping and Cadastre	LMO	10 to 15	V - 9	2	E	Correct the indication of the item	NSi1	No, the indication is correct.	No action
27	Geonovum	LMO	9	9.1	Monitoring the accessibility of metadata	G	It is stated that "...Member States shall establish and operate discovery services making it possible to search for spatial data sets...". But there is no indicator to measure search mechanism.	Propose an indicator "Existance of search mechanism"	The article 9.1 is a copy-paste of the directive : the "search mechanism" is the discovery services monitored through the accessibility indicator	No action
70	National Land Survey of Finland	LMO	4	9.1.		G,T	IR investigates the possibility "to search for spatial data sets and services on the basis of the content of the corresponding metadata and to display the content of the metadata". However art. 11.2 of INSPIRE directive specifies the minimum criteria for discovery services, the fulfilment of which should be investigated in the first place, and optionally the diverse or other content of "the corresponding metadata", which expression remains undefined and unclear.	Add measures or indicators for fulfilment of minimum criteria for discovery services as specified in art. 11.2 of the directive.	It is the role of IR NS to define the specifications of the INSPIRE services and their conformance criteria (they should include the requirement of the directive).	No action
71	National Land Survey of Finland	LMO	5	9.2.		G, E, T	Expression "on the basis of the corresponding metadata" remains undefined and unclear and should be clarified.	Clarify the relevant meaning for expression "on the basis of the corresponding metadata" as for monitoring discovery servicesk or state that the corresponding metadata refers to the minimum criteria for discovery services specified in art.11.2.	The sentence will be modified.	IR: change ""based on their corresponding metadata"
343	Czech Office for Surveying, Mapping and Cadastre	LMO	11 to 15	V -9,10		G	Both chapters speak dublicly about the conformity of download services with IR.		There is no duplication : article 9 deals with discovery services only.	No action

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50	Royal Netherlands Meteorological Institute (KNMI)	LMO	14	V	10	G	According to the definition stated here, it is impossible to have an existing view/download service which is not conformant. Is this ok? Previously indicators measure existence and conformance separately.	Add indicator for existence of view/discovery service	After internal discussion and discussions with the DT NS, the DT MR proposes to monitor existing services, no matter their conformance (accessibility of metadata and accessibility of spatial data sets) and then the full conformance of each service.	Justification document: Explain the new decision: monitoring existing services and then full conformance
251	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	37	V	10.5	G	Sub-indicators NSi21 and NSi22 should be defined as indicators.	Define <u>three</u> indicators here, as there is valuable information in NSi21 and NSi22, too. This can be done without extra calculation effort.	All sub-indicators will be published: so it is not necessary to call NSi21 and NSi22 indicators (chapter VI will be modified in order to clearly explain which data has to be published)	see n°62
31	Geonovum	LMO	13	V, 10	paragraph 5	T	Most indicators produce average figures for sub-indicators. This is not the case for NSi2. The definition ("both ... and ...") implies that a mathematical calculation on sub-indicators is not possible here.	Calculate NSi2 as the average of NSi21 and NSi22.	The indicator NSi2 can be calculated using the spreadsheet: if you know if a view service exists for the data set and if a download service exists for the same data set, then it is possible to know if the data set has both services. But it is necessary to add a sentence to ask for that additional data.	IR: add a sentence about data sets with both download and view services
145	Department for Environment, Food and Rural Affairs (Defra)	LMO	7	10		T	Why are transformation services not included alongside view and download services?	Explain.	The "transformation services" are optional: they will be used only when necessary. It is an intermediate tool to reach the conformity of spatial data sets. The IR MR proposes to monitor whether or not the INSPIRE services needed for each spatial data set exist (discovery, view, download). The other services (transformation, invoke services) are monitored through the indicator "conformance of services" and "use".	Justification document: Explain why there is no indicator on transformation (it's not link to spatial data sets)
326	Malta Environment and Planning Authority	LMO	12	V,10	1	G	Why not create an EU-wide portal for all the view and download services, either as a Central Data Repository (CDR) (refer to Point 1 above) or as distributed (country-CIRCA style) network that would be linked through one major portal at EU level?	The IR can only make sense if the deliverables are homogenous and are network through either a centralised or a coordinated distributed system (CDR-CIRCA-SEIS style) - Refer to Point 1 above	Out of scope	No action
327	Malta Environment and Planning Authority	LMO	12	V,10	4	T	The reference to conformity of discovery, view and download service is vague. A definition for conformity would need to be more explicit. This would also enhance harmonisation in terms of reporting.	Would be practical and useful to include a reference indicating the definition of conformity for "conformant view service" and "conformant download service". Refer to Point 4 above	see n°347	see n°347
328	Malta Environment and Planning Authority	LMO	13	V,10	4	Q	What value would be given to a downloadable service that only allows partial (spatial - ex: only NUTS1 as against NUTS5 - or certain landuse datasets only) or limited (not all attributes are included) downloads. This situation could be due to the fact that some areas could be deemed highly sensitive such as areas prone to archaeological theft or terrorism, amongst others)	The 1 and 0 raw data designation is too 'raw' to resolve these issues. Whilst one can see that simplicity is required in order to result in clear indicators, generalising the process may prove futile	It is out of scope of IR MR. The future IR MR NS will define the requirements for download services. The "sensitive areas" are protected by article 13 of the Directive and the IR MR MD has an element for the "public access limitation". The guidelines can explain that if it is an obligation to publish a data set, then the service should allow that access	Guidelines: develop the paragraph on the list of services
198	Institut Géographique National	LMO	16	V.10.4		T	As in the paragraph 8.5, a ratio could be interesting for the services.		A ratio is used as specified in paragraph V.10.5	No action
289	AGI - Association for Geographic Information	SDIC	18	V	11.4	T	There may be many services that are only available to a specific user community that do not need to meet the INSPIRE minimum performance requirements (e.g. are not available 24/7).	Re-think indicator.	Out of scope. Services that are not used for the implementation of the directive are out of scope	No action

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167	Instituto Geográfico Português	LMO	5	Chapter V	11.4	G	The minimum performance requirements are defined in the corresponding Implementing Rules? If it is so, it should be referred here.		The IR MR always refer to the Directive and the IR MR for NS which will be composed of technical specifications and minimum performances, all grouped in the NS IR.	IR: clearly refer to IR (technical specs and performances)
290	AGI - Association for Geographic Information	SDIC	19	V	11.5, 12.5	T	The denominator in the sub-indicators is the number of all such services. This may not be known, for example, there may be many transformation services, provided by different suppliers.	Re-think sub-indicators	No: only services that are being used to implement the directive have to be counted, and those services must be known and must be monitored.	see n°328
51	Royal Netherlands Meteorological Institute (KNMI)	LMO	15	V	11	G	Unclear what is measured or meant with 'performance' in this chapter. Is availability / accessibility measured as part of performance? Is capacity also measured as part of performance?	Please provide more details on how performance is expected to be measured. Add extra indicators for availability and capacity if needed.	see n°167	see n°167
52	Royal Netherlands Meteorological Institute (KNMI)	LMO	16	V	11	G	Where will the 'minimum performance requirements' be specified? How will this be measured? Who will define the 'minimum performance'?	Please specify 'minimum performance'	see n°167	see n°167
53	Royal Netherlands Meteorological Institute (KNMI)	LMO	17	V	11	E	at 5, indicators are divided by the number of all discovery services. Should this be all conformant discovery services?	Please modify the text or explain.	The DT MR proposes to change the monitoring (after Paris meeting -september 2008): the denominator will refer to "existing services", no matter the conformance.	see n°167 Justification document: clearly explain what is considered in monitoring services
257	Lenkungsremi um GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	43	V	11	T	Assumption: The exact performance criteria will be determined by the implementing rules for network services. Question: How often a service has to deliver responses within the defined performance criteria so that it will be fulfil the performance-degree of this implementing rule?	please clarify	Out of scope. Performance requirements are defined in the IR MR for Network services	No action
249	Lenkungsremi um GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	35	V	11	G	The measurability of these indicator is doubtful, because the influences (technical, restrictions, disclaimer clicks) are too much. This problem was pointed out in the review of the draft for the IR View Services, where the response time of 3 seconds for a view service was recommended.	a) delete these indicator b) indicator is "average performance" with one value c) define a unique performance test for all INSPIRE services in Europe	Out of scope. The indicator only checks whether or not the service fulfils the requirements (including performance requirements) defined in the NS IR (see the documents from the DT NS understand how MS could measure performances - from the point of view of servers providers, not from the user perspective) .	No action

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329	Malta Environment and Planning Authority	LMO	14	V,11	2	G	Define what is meant by performance. This is not clear. Also, define what is meant by a minimum performance. What makes a minimum a minimum? For example, a dataset is available at NUTS 1 level but not at NUTS5 which may be one requirement. This results in a minimum '1' value but as a dataset it is useless. Another example would be the use of such datasets as CLC2000 - the minimum was achieved as per EU requirements but its performance at Maltese level is next to useless due to its intrinsic generalisation. The term in e) "at or above the minimum requirements" adds on to the need for clarification of the definition: either there is reference only to the minimum or else create a hierarchical level of requirements as evidenced in the Dataflow requirements to the EEA CDR	Clarify the definition of minimum requirements, and reword the text "at or above the minimum requirement".	see n°37	see n°37
63	Surveying and Mapping Authority of the Republic of Slovenia	LMO	4	11.12		G	Do the indicators NSi3 and NSi4 refer to all network services or only to conformant ones?	Guidelines should be more precise.	During the meeting in Paris, (September 2008), the DT MR decided to monitor: -from article 9 to article 11: existing services, no matter the conformance -article 12: conformant services	IR: after the final decision, the articles 9 to 11 deal with all services, article 12 deals with conformant services.
65	Surveying and Mapping Authority of the Republic of Slovenia	LMO	6	11.12		G	Indicators Nsi3 Nsi4 – sub-indicators Nsi34 and Nsi44 – performance and use of transformation services – do these indicators refer only to the services for transformation of coordinate reference systems or also to the transformation services, enabling spatial data sets to be transformed with a view to achieving interoperability (transformation application schemas, style, service protocol...). In the second case this indicators should be difficult to calculate.	IR should explain which transformation services this indicators refer to.	The indicator refers to all the transformation services. The scope of those services should be specified in the NS IR.	see n°328
90	Swedish Environmental protection Agency	LMO	4	12		T	It is important to define concepts of great importance for monitoring and reporting to secure a common application between MS and make it possible to make comparisons over Europe. For example what is meant by a request?		see n°257	No action
330	Malta Environment and Planning Authority	LMO	15	V,12	5	T	The Indicator result will prove problematic due to the different number of variables integrated into the calculation. As an example one can argue that one service could get a 1000 queries whilst another would just get 1 query. The indicator result would be unrealistic and becomes unreadable when all the services and views are calculated together.	Another indicator statistical measure is required based on the results emanating from the calculations of Sub-Indicators 5a-d. Refer to Point 9 above	No. The goal is not to compare specific services but to have a view of the overall use (where theory of large numbers applies)	Guidelines: develop a paragraph on indicator "use"
344	Czech Office for Surveying, Mapping and Cadastre	LMO	12 to 15	V - 12		G	This indicator cannot be objectively compared in states with low number of users or big number of services. It can only serve for monitoring of the development of the infrastructure in the state of question.		Indicators of IR MR are proposed to monitor the situation of each MS, they can not be used as they are to compare MSs.	Guidelines: explain that the comparison between MSs must be done carefully.
291	AGI - Association for Geographic Information	SDIC	20	V	12.3	T	How can a member state monitor the use of a spatial data service if the European portal is used instead of a member state service. I.e. the memberstate may decide not to create a service but encourage stakeholders to use the European portal. Or users may decide to go via the European gateway instead of member portals. How effective is this indicator?	Clarify identification of users	No problem with that. With independence of the entry point the request will finally reach the service of the member state. Only when it has been used harvesting for the discovery service the request do not reach the discovery service of the MS, but the impact is similar for all MS and the effect on the overall indicator can be solved by a monitoring of the use at the EC portal.	Guidelines: develop a paragraph on indicator "use"

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357	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	10	V.12.3		T	There will be a lot of additional requests to the service providers, out of the direct use of the respective services. Shouldn't those be counted as indicator as well?	please consider	see n°291	see n°291
292	AGI - Association for Geographic Information	SDIC	21	V	12.5	T	Why is the average number of service requests of any relevance? The objective is to have services that access the data sets. If this is achieved through additional services specific to sectors or user communities, then so much the better.	Make the indicator the number of service request, and do not divide by the number of services.	The average requests per service may provide a more homogeneous measure for MS with different sizes (and consequently with reasonable proportional number of services and user requests). Data used for the calculation of indicators and sub-indicators will be published, so the number of service requests will also be published.	Guidelines: develop a paragraph on indicator "use"
255	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	41	V	12.5 e (as an example)	T	The average as indicator is not significant. Without information of standard deviation and variance the resulting indicator is not evaluable and hard to interpret. This does apply to all indicators in the document.	Add in addition to the average also the standard deviation and variance as indicator.	No. Data used for the calculation of indicators and sub-indicators will be published. If necessary, it will be easy to calculate additional indicators.	IR: specify in chapter VI which data has to be published
256	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	42	V	12.5	G	The draft does not consider that the services can be organized in different ways. The services can either be structured that they comprise many information in a very compact way, or that the same load of information is split into many services, divided by region or content. Thus the division by the number of services will mostly give a result on how compact services are organized and will not display the actual usage of the services. In other words: the outcome of this indicator is not clear, more confusing	New (clear) definition or delete	see n°292	see n°292
54	Royal Netherlands Meteorological Institute (KNMI)	LMO	18	V	12	E	What is meant with 'service request'? A unique visitor? A URL request? Service requests only do not provide realistic usage statistics.	Please define 'service request'	see n°28	see n°28
252	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	38	V	12.1	E	Clarification	Change to "In accordance with Articles 21(1) and (2.c) of the Directive, Member States shall collect information on the use of the infrastructure."	Accepted	IR: modify the sentence

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253	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	39	V	12.5	G	Explanation needed	Does "annual" mean a "calendar year" (January to December)?	"Annual" means 12 months. The DT MR proposes to fix it as a "calendar year". Explanations will be added in the guidelines, also about the first monitoring (maybe less than one full year)	Guidelines: in the new paragraph on indicator "use", explain what does "annual" mean.
258	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	44	V	12	G	To log all requests / responses of all services seems to generate a disproportional high effort. In order to fulfill the requirements of the INSPIRE directive it should be adequate to analyze the logged requests / responses in well defined intervals to derive a tendency.	Please evaluate an alternative approach.	The implementation must be pragmatic. If the accounting of services requests can not be done continuously along the year, it shall be allowed to extrapolate the annual number of requests from the available data as long as this extrapolation has sufficient statistical basis.	Guidelines: give examples of already existing indicators (ask DT NS)
64	Surveying and Mapping Authority of the Republic of Slovenia	LMO	5	12.19	paragraph 4	g	Nsi4 – MS shall provide the first result of monitoring one year after the adoption of these implementing rules. It will probably be in the middle of the year, for which period shall MS measure annual number of requests?	IR should explain how to collect the annual number of requests for the first year.	see n°253	Guidelines: a calendar will be proposed.
32	Geonovum	LMO	14	12.4		T	Doesn't say that much if it is not related to the spatial data set itself. Some MS will create one view service for all spatial datasets other MS will have for example 20 view services.	My proposal is to relate these services with the spatial data sets itself and make counts on the use of the service regarding the data that's in	It will be more difficult to monitor the use of services regarding data sets.	No action
115	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	2	12.4		T	A service can be reached via a national portal or directly via the authority/organisation that provides the service. It can be difficult to gather a total sum of all requests. What is meant by a request? If a user zooms in 10 times, would that be 10 requests?	Be more precise on what's meant by " a request"	The requests are considered from the server point of view, as the DT NS does for the definition of performances. It is not necessary to define a request in the IR MR as it will be defined in the IR NS. Some clarification could be added in the guidelines: a request to the service could be specified as any request to the service operations (i.e.: any request to GetCapabilities, GetMap or GetInfo operations in a WMS which has being adequately answered).	Guidelines: explain what is a request; check the consistency with IR NS
174	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	2	12.4		T	A service can be reached via a national portal or directly via the authority/organisation that provides the service. It can be difficult to gather a total sum of all requests. What is meant by a request? If a user zooms in 10 times, would that be 10 requests?	Be more precise on what's meant by " a request"	see 115	see 115
199	Institut Géographique National	LMO	17	V.12.4	12.4.b	T	for a view service, it might be difficult to count the number of service request, because some service upload a greater area than required and don't "work" with the server for some move.	a specialist should be able to precise the label of the indicator	see n°115	see n°115
72	National Land Survey of Finland	LMO	7	12.1., 12.2.		G	Monitoring use of spatial data services is missing the quality aspect, i.e. the amount or proportion of service requests failed to fulfill. Apparently it is necessary to have feedback from the users for specifying the types of unfulfilled service requests as well.	Add measures or indicators for fulfilment of service requests (completed/failed).	No. Quality aspects should be embedded in the conformance criteria, which are specified in IR NS.	No action
168	Instituto Geográfico Português	LMO	6	Chapter V	12.5	T	it seems a strange indicator to assess the use of the services. The obtained value can be not significant.		Monitoring the use is a requirement of the Directive, in Article 21(1).	No action
Chapter VI - Reporting									0	

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38	Royal Netherlands Meteorological Institute (KNMI)	LMO	2	-	-	G	The reports to be delivered should not lead to an enormous administrative burden for the Member States. This can be avoided by e.g. providing ready to use reporting templates and providing automated tools for indicator measurements.	Provide reporting templates and automated tools for indicator measurements	Report template is provided in the guidelines. It is not sure that there will be some tools provided by the EC for collecting and finalising indicators, there might be.	Guidelines: improve the template for reporting.
55	Royal Netherlands Meteorological Institute (KNMI)	LMO	19	VI	13	G/E	We would expect a reporting template here (table of contents of report and instructions of what has to be written in each chapter). This on order to have uniform and harmonized reports from the Member States.	Please provide a report template	see n°38	see n°38
200	Institut Géographique National	LMO	18	VI		G	there is no possibility to document the result of the monitoring to provide elements for improvement (eg : provide detailed component of metadata which is not compliant...)	Each member state shall provide complementary elements on the result of the monitoring	Accepted	IR: add a sentence to ask MS to comment monitoring results. Guidelines: add sections for comments on monitoring results in the reporting template.
113	CTC-RW - Comité Technique de Cartographie de la Région wallonne	SDIC	3	Chapter VI - Reporting		G	It should not be a bureaucratic reporting. It is better to devote time to produce geographic data sets and develop the technical infrastructure than writing administrative report. The reporting should be as short as possible and based on monitoring. It should request a minimum to be sure to get it (see for example Metadata Implementing rules).		The Directive states specifically which elements need to appear in the report -see Article 21(2)- or requirements to which MS shall comply (e.g. Metadata IR MR). MSs can be as brief or elaborate as they wish within the IR MR. Some elements are only covered in the reporting, in particular data sharing, so this is the only possibility to show the progress of Directive implementation.	Guidelines: add a paragraph to explain the reporting activity.
91	Swedish Environmental protection Agency	LMO	5	13		G	It is not clear that the reporting concerns the national level. It will be very complex if the reporting also concerns each participating authority.	Clarify that the chapter concern the national level.	The reporting activities focus on the national level (article 13) and on an overview of the other levels (article 14).	Guidelines: add a paragraph to explain the "cascading" reporting.
116	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	3	13		G	It is not clear that the reporting concerns the national level. It will be very complex if the reporting also concerns each participating authority	Clarify that the chapter concern the national level	see 91	see 91
175	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	3	13		G	It is not clear that the reporting concerns the national level. It will be very complex if the reporting also concerns each participating authority	Clarify that the chapter concern the national level	see 91	see 91
36	Geonovum	LMO	18	VI		G	Reporting as proposed is very extensive. What is meant by 'comment', 'overview', 'description' and 'explanation' and what level of detail is asked?	Use a special reporting sheet where topics are named and limited.	The wording has to be unified (comment/overview/description/explanation). It is recommended that the reporting should be as concise and complete as possible: each MS is free to develop more detailed reporting.	IR: unify the wording in the chapter VI (comment/overview/description/explanation). Guidelines: improve the reporting template (e.g. add list of topics)
146	Department for Environment, Food and Rural Affairs (Defra)	LMO	8	13	Paragraph 1	G	It is not clear what is meant by the last bullet "an overview of the working methods".	Clarify.	Change to "An overview of the working practices and procedures of the coordinating body"	IR: Change to "An overview of the working practices and procedures of the coordinating body"
331	Malta Environment and Planning Authority	LMO	16	VI,13	2	Q	Will a lineage format be provided?	Identify the reporting tools such as lineage	The Quality Assurance is referring to the Quality Assurance of the overall infrastructure, not to the data within it. Examples will be added in the guidelines.	Guidelines: add examples of quality assurance elements that could be reported.

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293	AGI - Association for Geographic Information	SDIC	22	VI	13.2	T	What are the "quality assurance processes" designed to do?	Explain further	see n°201	see n°201
33	Geonovum	LMO	15	13.2		T	What's meant by the certification mechanism?	Give clarification or leave it out.	see n°201	see n°201
169	Instituto Geográfico Portugués	LMO	7	Chapter VI	13.2	G	Certification mechanism needs to be clarified.		see n°201	see n°201
201	Institut Géographique National	LMO	19	VI.13.2		T	Is there any definition of Quality Assurance in the context of INSPIRE?	Clarify "Quality Assurance"	The wording will be checked, including elements from the EC.	It is up to Member States to define their most appropriate quality assurance procedure. Definitions of "quality" may be found, if appropriate, in the corresponding Implementing Rules (e.g. Annex, Part A.1 of the IR on Metadata)
294	AGI - Association for Geographic Information	SDIC	23	VI	14 a)	T	How can the users be analysed? Does anyone who uses the service have to identify themselves and from which organisation they are coming from? Or is access anonymous unless data are downloaded?	Clarify	Analysis isn't being asked for: it is just an "overview" or general picture of the types of stakeholders involved and the way they are involved in the infrastructure and its implementation	IR: check the wording of article 14(a). Guidelines: add explanation on the reporting activities
261	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	47	VI	14 b)	G	Art. 21 (2) of the INSPIRE directive mentions only "summary descriptions"! A description of the role of all stakeholders would overburden the reports and is unacceptable especially for large and federally organised member states	delete paragraph	"A description of the role of all stakeholders" is intended as a summary of the roles of types of stakeholders in the implementation of the infrastructure, general rather than specific	IR: check the wording of article 14(b) - (see also n°36). Guidelines: add explanation on the reporting activities
262	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	48	VI	14 d)	G	a detailed description of all cooperations would also be too complicated	replace "description" by "general overview"	All the chapter VI will be changed in order to be consistent with the requirements of the Directive, Article 21(2): "give summary descriptions". For example, the end of the first sentence of article 14 could be changed to "The report shall comprise an overview of:" (the following bullet points would be reformulated in order to have sense).	IR: all the chapter VI will be changed in order to be consistent with the requirements of the Directive (give summary descriptions"): : check if the new wording is adapted.
263	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	49	VI	14 d)	G	there will be many written frameworks in all levels of public administration overburdening the reports; important for the european point of view ist only the organisation on the highest national level	replace "stakeholders" by "organisation of the coordinating structure supporting the national contact point"	see n°262	see n°262
295	AGI - Association for Geographic Information	SDIC	24	VI	15 c)	T	How can the usage of the infrastructure by the public be measured if the access is via the European portal. Will surveys have to be carried out to determine usage?	Clarify	It is difficult to report on the usage by the broader public.	IR: the bullet 15(c) is dropped.

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117	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	4	15	c	T	In practise it will be very difficult to measure the usage "by a broader public"	Delete bullet c	see n°295	see n°295
176	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	4	15	c	T	<i>In practise it will be very difficult to measure the usage "by a broader public"</i>	Delete bullet c	see 117	see 117
171	Instituto Geográfico Português	LMO	9	Chapter VI	16-a)	G	These mechanisms should be identified here - is it the accessibility, licensing conditions, pricing models, etc of the spatial data existing in the infrastructure?		The whole article on data-sharing will be rewritten according to the results of the discussion with DT DSS (see Minutes of DT MR meeting in Maribor - June 2008) and checked by the DT DSS.	IR: rewrite the whole article 16 and ask the DT DSS to review it
264	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	50	VI	16 b)	G	for large and federally organised member states, there will be many data sharing arrangements; an overview of all arrangements would not be acceptable	replace "overview" by "general overview"	The guidelines will explain what is expected here: a general overview, not a detailed list of data sharing arrangements.	Guidelines: explain the requirement "overview of data sharing arrangements"
56	Royal Netherlands Meteorological Institute (KNMI)	LMO	20	VI	16	E	Please rephrase text at 'c)', 'inter alia' is used three times in one line...		Accepted (the whole article 16 will be rewritten).	IR: check the final wording of the article 16
73	National Land Survey of Finland	LMO	9	16		G	Exclude clause 16 C)	Exclude clause 16 C)	The bullet will be kept but reformulated (e.g. use "weaknesses", "barriers for sharing" instead of change "known issues")	IR: change the wording of article 16(d).
202	Institut Géographique National	LMO	20	VI.16.b	in the brackets	E	"which spatial data sets and services"	"what spatial data sets and services"	see n°56	see n°56
92	Swedish Environmental protection Agency	LMO	6	16	c	T	It will be difficult to gather the information from each authority and complex to use that information as well.	Delete bullet c)	see n°56	see n°56
118	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	5	16	c	T	<i>It will be difficult to gather the information from each authority and complex to use that information as well</i>	Delete bullet c	see n°56	see n°56
177	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	5	16	c	T	<i>It will be difficult to gather the information from each authority and complex to use that information as well</i>	Delete bullet c	see n°56	see n°56
159	Ordnance Survey	LMO	10	16 c)		E	License' used in place of 'licence'	Replace 'model license' with 'model licence'	see n°56	see n°56
203	Institut Géographique National	LMO	21	VI.16.c	in the brackets	E	"(inter alia, unique modele license)" : repeats "inter alia" in a strange fashion	"(unique modele license, among others)	see n°56	see n°56
204	Institut Géographique National	LMO	22	VI.16.c	in the second brackets	E	"(inter alia, cost ..." : repeats "inter alia"	"(e.g. cost ..."	see n°56	see n°56

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205	Institut Géographique National	LMO	23	VI.16.d	1st part of the sentence	E	"inhibits" is grammatically wrong and the first part of the sentence is not easy to read. Replace by =>	"A list of known issues that still inhibit fluent sharing of spatial data sets and services"	see n°56	see n°56
119	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	6	16	d	T	Unclear if this section concern a general national level or if more detailed information from each authority is expected. The issues will depend on the authority and the theme which leads to a very complex list.	Delete bullet d	see n°56	see n°56
178	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	6	16	d	T	Unclear if this section concern a general national level or if more detailed information from each authority is expected. The issues will depend on the authority and the theme which leads to a very complex list.	Delete bullet d	see n°56	see n°56
206	Institut Géographique National	LMO	24	VI.16	Last sentence	G	"The first report only will provide..." : why "only" ?	Clarify the meaning of this "only"	see n°171	see n°171
345	Czech Office for Surveying, Mapping and Cadastre	LMO	13 to 15	VI - 16		G	We propose to add the information on data sharing on the international level and on conformity of sharing (data exchange) with IR.		see n°171	see n°171
127	General Administration of Patrimonial Documentation	LMO	2	VI, 17		G	The collect of all these data for Monitoring and reporting will cost a lot of time and money for LMO's while currently budgets of LMO's are cut down		The implementation of the IR MR must be pragmatic (see n°215).	see n°215
132	FPGI / PFIG - Federaal Platform voor Geo-Informatie / Plate-forme Fédérale de l'Information Géographique	SDIC	2	VI, 17		G	The collect of all these data for Monitoring and reporting will cost a lot of time and money for LMO's while currently budgets of LMO's are cut down		see 127	see 127
128	General Administration of Patrimonial Documentation	LMO	3	VI, 17		G	The necessary organisation within Member States for Monitoring and reporting will need a lot of means (cell composed of several persons for coordination of answers of LMO's) .		The implementation of the IR MR must be pragmatic (see n°215).	see n°215
133	FPGI / PFIG - Federaal Platform voor Geo-Informatie / Plate-forme Fédérale de l'Information Géographique	SDIC	3	VI, 17		G	The necessary organisation within Member States for Monitoring and reporting will need a lot of means (cell composed of several persons for coordination of answers of LMO's)		see 128	see 128
57	Royal Netherlands Meteorological Institute (KNMI)	LMO	21	VI	17	G	Costs / benefits will be hard to measure and compare in an objective way.		The template could help MS in costs/benefits reporting.	Guidelines: improve the template for costs/benefits reporting
34	Geonovum	LMO	16	VI, 17		G	In general, the text of the 6th chapter is vague and requested information is not very specific. Certain expressions permit the possibility of empty reporting, e.g. (17) "Where possible costs shall be described for any national, regional and, where practicable , an overview of local initiatives as well"....	Be more specific or submit a template . Report on costs/benefits should be aggregates of specific cost/benefit analyses on compliance of data sets and services.	The whole article on costs/benefits will be rewritten to be more clear (e.g. check the use of "where practicable", "where possible"), based on "summary descriptions" and develop the "benefits" part.	IR: rewrite the whole article 17 Guidelines: give examples on costs, and also on benefits.

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265	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	51	VI	17	G	Regarding the implementation and operating of an NSDI, it is very complicated to distinguish costs related to tasks inside and outside the INSPIRE Directive. As already mentioned in the text, it is difficult to collect detailed and comparable costs from national, regional, and local initiatives, so the costs can only be an estimation . Art 21(2) mentions only "summary descriptions of Costs and benefits"		see n°34	see n°34
74	National Land Survey of Finland	LMO	8	17		G,T	Cost and benefit monitoring seems rather laborious in respect to the achievable results in terms of reliability and scale. The calculation principle that costs for the tasks that " <u>existed</u> " <u>beyond legal framework of the directive shall not be reported, is falsifying the entire productivity picture</u> because it is minimizing the costs that would realize sooner or later in creating SDI, which is the basic issue. Hence, as this principle is not giving a correct economic picture, why not to include all the costs related to the INSPIRE-SDI and the organisations concerned, and instead <u>try to figure the inevitable cost and resource savings of co-ordinated SDI construction work compared to fragmented development without INSPIRE framework.</u>	Consider the calculation principle for cost-benefit assessment.	see n°34	see n°34
94	Swedish Environmental protection Agency	LMO	8	17		T	It is difficult to <u>separate costs related to existing legal mandates and costs related to the Directive</u> It will be easier to report cost benefits if the answers are related to a period of time.	Change the second sentence in the first paragraph; "This implies that costs related to tasks which are being performed from (e.g. 15/5 2007) will be reported".	see n°34	see n°34
120	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	7	17		T	It is difficult to separate cost related to existing legal mandates and cost related to the Directive. It will be easier to report cost benefits if the answers are related to a period of time.	Change the second sentence in the first paragraph; "This implies that costs related to tasks which are being performed from (e.g. 15/5 2007) will be reported."	see n°34	see n°34
179	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	7	17		T	It is difficult to separate cost related to existing legal mandates and cost related to the Directive. It will be easier to report cost benefits if the answers are related to a period of time.	Change the second sentence in the first paragraph; "This implies that costs related to tasks which are being performed from (e.g. 15/5 2007) will be reported."	see n°34	see n°34
207	Institut Géographique National	LMO	25	VI.17	First sentence	T	The French Geoportail has been developed as INSPIRE was under development. <u>The costs link to its development is part of the costs to be reported.</u>	Delete the second sentence ("This implies ... reported").	see n°34	see n°34
260	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	46	VI	17	G	It is difficult to <u>separate the costs for realisation INSPIRE from general IT-effort.</u>	delete	see n°34	see n°34

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180	EuroSDR - EuroSDR - European Spatial Data Research Organisation	SDIC	8	17	d	T	Why divide the costs into different parts (metadata, data harmonisation)? Some costs will be hard to separate.	Do not divide the cost into different parts.	see n°34	see n°34
121	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	8	17	d	T	Why divide the costs into different parts (metadata, data harmonisation)? Some costs will be hard to separate.	Do not divide the cost into different parts.	see n°34	see n°34
311	Met Office	LMO	MetO14	17		G	This is quite strong on reporting costs , but extremely weak on reporting benefits		see n°34	see n°34
266	Lenkungsremi um GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	52	VI	17	G		delete third clause and listing a) - f) completely. The clauses 1 and 2 of the paragraph can be kept.	see n°34	see n°34
267	Lenkungsremi um GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	53	VI	17	G		insert "The report shall comprise: a) estimate costs caused by the implementation of the INSPIRE directive, where possible. b) examples of benefits observed, e.g. examples of the positive effects on policy preparation / implementation / evaluation within an administration, examples of improved service to the citizen as well as examples of cross-border-cooperation."	see n°34	see n°34
208	Institut Géographique National	LMO	26	VI.17	f	T	Do we have to report on the cooperation with Swisserland (who is out of UE) or do we have to report on cooperation only with MS from UE ?	clarify	Cooperation with neighbouring countries, even out of UE is interesting.	Guidelines: add examples of cooperation with countries out of UE.
58	Royal Netherlands Meteorological Institute (KNMI)	LMO	22	VI	18	G	Why is there an 'Other issues' chapter? The text in the chapter seems to be a reminder for the authors. This gives the impression the document is not complete yet.		The article 18 "Other issues" has been proposed in order to follow explicit requirements of the Directive (e.g. cross-border consistency, existence of transformation services, ...) not in the monitoring part. This article will be deleted. The contents will be reviewed: if it is consistent with INSPIRE requirements, it will be kept in other articles of the chapter VI. additional topics could be added (e.g. supranational .	IR: split the article 18 ("other issues") in the other articles of chapter VI
268	Lenkungsremi um GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	54	VI	18	G	Last sentence: Information about optional/recommended elements is not part of the commitments caused by the directive, so reporting about it is not necessary	delete paragraph or insert "(optional)" at the end of this phrase	see n°58	see n°58

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95	Swedish Environmental protection Agency	LMO	9	18		T	The content in this chapter needs to be clarified .		see n°58	see n°58
147	Department for Environment, Food and Rural Affairs (Defra)	LMO	9	18			The " Other issues " section in Chapter VI - Reporting, unlike the other sections, is not listed in Article 21(2) of the Directive. What is the justification for including this, as it would appear to go beyond the requirements of the Directive?	This goes beyond the Directive so should be removed.	see n°58	see n°58
313	Met Office	LMO	MetO16	18		T	This seems incomplete. Indeed it also misses supra-national agreements for which the Commission should take reporting responsibilities rather than individual MS	either remove this section or expand properly to be set of comprehensive requirements. In particular explain under what circumstances the Commission should have reporting responsibilities for supra-national SDIC data.	see n°58	see n°58
312	Met Office	LMO	MetO15	17	f	G	Here you ask for reporting cross-border cooperation as a BENEFIT of Inspire. What about existing cross-border and supra national cooperation for which INSPIRE is above all a COST!	This is disproportionate. Please recognise costs of retro-fitting existing supra-national and cross-border cooperation to INSPIRE.	see n°58	see n°58
259	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	45	VI	18	T	With the regulations of the drafting team data specification, especially to get one consistent data model for INSPIRE datasets, the first sentence "Description of efforts made to improve cross-border consistency ." is redundant.	Please delete this sentence.	see n°58	see n°58
122	LMV - Lantmateriet, National Land Survey of Sweden	SDIC	9	18	1st paragraph	T	It is difficult to measure different degrees of consistency.	Delete the second sentence.	see n°58	see n°58
181	<i>EuroSDR - EuroSDR - European Spatial Data Research Organisation</i>	SDIC	9	18	1st paragraph	T	<i>It is difficult to measure different degrees of consistency.</i>	<i>Delete the second sentence.</i>	see n°58	see n°58
209	Institut Géographique National	LMO	27	VI.17	Second sentence	E	"which existed already outside"	"which already existed outside"	see n°34	see n°34
210	Institut Géographique National	LMO	28	VI.17	last sentence before the a), b), c) etc. list	E	Words are missing in this sentence, it cannot be read. Replace by => (if the meaning of => is right)	"Where possible, costs shall be described for any national and regional initiatives. Also for local initiatives, elements (where possible) shall be provided.	see n°34	see n°34
254	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	40	V	18	E	New breakdown for clarification	a) Description of efforts made to improve cross-border consistency. b) Description of the degree to which themes integrate with each other. c) Information on transformation services being developed. d) Explanation on how data interoperability is achieved (harmonisation or use of transformation services). e) List and descriptions of spatial data sets that contain optional/recommended elements beyond those fulfilling the mandatory conformance for harmonised data.	see n°58	see n°58

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170	Instituto Geográfico Português	LMO	8	Chapter VI	15 or 18	G	Creation of a mechanism which allow to assess the degree of satisfaction of individual and institutional users, collecting their complaints and suggestions for the improvement of the infrastructure.		The proposal is interesting but it is out of scope of the IR MR. This topic has been discussed with the DT DSS (see the minutes of DT MR meeting in Maribor - June 2008).	No action
93	Swedish Environmental protection Agency	LMO	7	17		T	How will it be possible to monitor user requirements that not have been met, for example data/services that not are included in the infrastructure or other obstacles as secrecy, costs etc? A questionnaire with focus on users experiences, benefits/shortages in the infrastructure, could be part of the reporting.	Add a new bullet g)	The proposal is interesting but it is out of scope of the IR MR.	No action
96	Swedish Environmental protection Agency	LMO	10	18		T	A description of the process of regular capturing of user requirements should be part of the reporting obligations.	Addition to chapter 18.	The proposal is interesting but it is out of scope of the IR MR.	No action
Chapter VII - Phased implementation										0
129	General Administration of Patrimonial Documentation	LMO	4	VII, 19	§ 1	G	The calendar seems us unrealistic. It is difficult to do what is foreseen while not all implementing rules are defined. Moreover, we have until 15 may 2010 (annex I) and 15 may 2013 (annex II and III) to create metadata but here it is foreseen to give the first results of monitoring one year after the adoption of these implementing rules.		1. Monitoring does not apply when the IR have not been adopted. 2. The idea is to get an overview of the situation before the effects of the Directive start to take place - and then to see how the implementation changes year on year.	IR: check with the Commission all the dates in the IR Guidelines: develop a paragraph presenting a calendar of implementation of the IR (dates in the Directive, dates of adoption of all the IRs, dates of monitoring and reporting ...)
134	FPGI / PFIG - Federaal Platform voor Geo-Informatie / Plate-forme Fédérale de l'Information Géographique	SDIC	4	VII, 19	§ 1	G	<i>The calendar seems us unrealistic. It is difficult to do what is foreseen while not all implementing rules are defined. Moreover, we have until 15 may 2010 (annex I) and 15 may 2013 (annex II and III) to create metadata but here it is foreseen to give the first results of monitoring one year after the adoption of these implementing rules.</i>		see 129	see 129
149	Department for Environment, Food and Rural Affairs (Defra)	LMO	11	19	Paragraph 2	G	The draft M&R IR proposes that monitoring results are updated every year. Whilst there may be good reasons for doing this the Directive does not specify the frequency with which monitoring results must be updated.	Explain why a yearly interval for updates was chosen.	In Article 21(1), the Directive ask to the MSs to make the results of the monitoring accessible "on a permanent basis": the IR proposes to fix a minimum periodicity for the update of the monitoring results (one year). The Directive has fixed the periodicity of the reporting (every three years) : -it will be useless to have a periodicity greater than the periodicity of reporting -the year period seems adapted to the calendar of INSPIRE (milestones more often than one year) and acceptable by MSs.	Guidelines: add a FAQ on the periodicity of monitoring
138	National Survey and Cadastre, Denmark	LMO	3	Chapter 7	Paragraph 1	T	It is suggested, that the MS shall update the monitoring results every year.	According to article 21, reporting should be made every three years - could you clarify this point please.	The reporting periodicity is fixed in the Directive, Articles 21(2) and 21(3): every three year. The monitoring results must be accessible "on a permanent basis": the IR MR proposes to fix a minimum periodicity for the update of the monitoring results.	No action

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172	Instituto Geográfico Português	LMO	10	Chapter VII	19	G	Where is defined in the Directive that the first monitoring results shall be provided one year after the adoption of the implementing rules? And then every year? These dead-lines and periodicity are being established in these IR - it should be made clear that it is so.		All the dates and periodicities that are not fixed by the Directive must be fixed by the IR MR (e.g. the first monitoring results, the periodicity of the update ..)	IR: the IR will propose fixed dates Guidelines: develop a paragraph presenting a calendar of implementation of the IR ; clearly explain which periodicity, deadlines... come from the Directive (e.g. three-yearly-report) and those fixed in the IR (e.g. update at least every year the indicators) in a new paragraph "Calendar"
148	Department for Environment, Food and Rural Affairs (Defra)	LMO	10	19	Paragraph 2	G	The Commission's transposition work programme proposes that monitoring provisions are implemented on the 15th May 2010, based on Article 21(1) of the Directive, although it is actually Article 21(2) that refers to the 15th May 2010. The draft Monitoring and Reporting IR states that "Member States shall provide the first results of monitoring one year after the adoption of these implementing rules...". This inconsistency needs clarified.	Remove inconsistency.	see n°148	see n°148
332	Malta Environment and Planning Authority	LMO	17	VII,19		Q	Will the EU publish a final report on each annual delivery so that each MS can review its status? When will such be published?	An annual report should be published at EI-level and includes all MS outputs	This proposal is out of scope of the IR MR (the objective of the IR MR is to detail the rules for MS, not for the Commission).	No action
41	Royal Netherlands Meteorological Institute (KNMI)	LMO	5	-	-	G	Why report only every three years?	Suggestion to split reporting: Static information every 3 years, including the report as suggested by the document. Report the (relevant) indicators each year, preferably in an automated fashion. This to enable better monitoring of progress made.	see n°148	see n°148
211	Institut Géographique National	LMO	29	VII.20	second paragraph	E	"there after"	"thereafter"	Accepted	IR: check the spelling and grammar
212	Institut Géographique National	LMO	30	VII.20	last sentence	E	Geoportal of the EC : provide the address for this geoportal	Provide adress for the EC geoportal	It doesn't seem appropriate to fix an address in a legal text.	No action
Chapter VIII									0	
59	Royal Netherlands Meteorological Institute (KNMI)	LMO	23	VIII	21	E	Remove 'Done at ...'	Remove 'Done at ...'	The final formulation will be fixed by the legal service of the Commission.	No action
346	Czech Office for Surveying, Mapping and Cadastre	LMO	14 to 15	VIII		E	The name of the chapter and of the paragraph should be differentiate.		Not accepted	No action
GUIDELINES - JUSTIFICATION									0	
218	Lenkungsgrremium GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	4	general		G	In the introduction is missing how guideline and justification are supplementing the IR	add introduction	The reference to the guidelines in IR MR will be done as for the IR MD.	IR: copy-paste the sentence from the adopted IR Metadata.

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348	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	1	general		G	In the introduction is missing how guideline and justification are supplementing the IR	add introduction	see 218	see 218
44	Royal Netherlands Meteorological Institute (KNMI)	LMO	8	II	3	E	Missing references to other documents (applicable or reference), like the Justification document and Guidelines document	Please add references to relevant documents, both applicable documents and reference documents.	see n°218	see n°218
162	United Kingdom Hydrographic Office	LMO	3	All		G	As the Guidelines and Justification documents have to be read along with the IR perhaps they should be combined with the IR or at least the most relevant content combined?		see n°218	see n°218
275	AGI - Association for Geographic Information	SDIC	4	General		G	Cross referencing to justification and guidelines supporting reports needed	Include references to supporting documents	see n°218	see n°218
269	Lenkungsreim GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	55	Guidelines	page 13	E	Guidelines: table monitoring network Services: how is the table about the services connected to the table about the metadata coverage? There are no headings for the table columns in the table on page 13	add table headings	The spreadsheet for Services need to be developed.	Guidelines: improve the paragraphs on the monitoring with the spreadsheet (part for data sets - part for services) and explain the link between the two parts.
270	Lenkungsreim GDI-DE (Steering Committee GDI-DE) (explanation: GDI-DE = Spatial Data Infrastructure Germany)	LMO	56	Guidelines	page 6, example 2	T	Even if there are much less climate stations in the "new" federal states of Germany, there are a few, see: http://www.wetterpool.de/database/density_16.jpg . In particular in Saxonia the density of climate stations is comparable to the "old" Federal German states. Thus, example 2 may cause friction within the German Geocommunity.	please check, change or make clear that this does not represent the reality.	The examples will be changed.	Guidelines: erase the example on climate station and provide another one
359	BGR (Federal Institute for Geoscience and Natural Resources), Germany	LMO	12	Guidelines	page 6, example 2	T	Even if there are much less climate stations in the "new" federal states of Germany, there are a few, see: http://www.wetterpool.de/database/density_16.jpg . In particular in Saxonia the density of climate stations is comparable to the "old" Federal German states. Thus, example 2 may cause friction within the German Geocommunity.	please check, change or make clear that this does not represent the reality.	see 270	see 270
214	Institut Géographique National	LMO	32	Guidelines 1.4	second paragraph	T	The description of spatial resolution should be mandatory.	Use "is" instead of "can be considered" and modify the end of the paragraph.	Accepted	Guidelines: Use "is" instead of "can be considered" and modify the end of the paragraph.

