

**Stellungnahme der Bundesarchitektenkammer (BAK)
zum Entwurf ISO CD 37122 „Sustainable Development in Communities -
Indicators for Smart Cities“**

Date: 25.12.2017	Document: ISO-CD 37122	Project:
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Name, Vorname	Titel	Firma / Behörde / Institution	Straße, Ort	E-Mail-Adresse
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		Preliminary remark		ge	<p>The draft international standard ISO CD 37122 „Sustainable Development in Communities - Indicators for Smart Cities“ – presents a method using indicators to measure and steer the performance capacity concerning the “smartness” of the cities.</p> <p>It has been agreed in the German DIN mirror committee “NA 172-00-12 AA – Sustainable development of communities” that a condition for the decision on adoption or non-adoption of the standard into the German standards is based on the quantity and quality of the feedback received from the cities and municipalities as well as from the professional institutions being the future users of this standard.</p> <p>In this sense, there should have been the possibility for early feedback of the cities and municipalities before the adoption as DIN ISO CD 37122 into the German standards. The fact that this is not the case is very unfortunate.</p> <p>Following an intensive examination, the BAK recommends not to adopt the proposed indicator approach for measuring the smartness of cities into the German standards for the following reasons:</p>		

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					<p>For many of the presented indicators, there is often no necessary data available on municipal level. In case of a query, these should be obtained individually. However, cities and municipalities as being the main users of the committee draft, do not have the necessary personnel and financial resources to do so. This applies even more to cities and municipalities being part of an administrative district as for the larger cities that are not part of an administrative district and that have their own statistic services. Due to these as well as to methodological reasons, the BAK rejects 36 of the 74 indicators in general, because they are not at all or only with considerable effort measurable.</p> <p>In our view, pretest for validation and eventual remodeling should be carried out for 10 of the 74 indicators. The BAK refers to a more detailed position further below.</p> <p>For many of the indicators, the BAK has considerable doubts regarding their possible contribution to the valuation and appreciation of a sustainable municipal development – even if the term “smartness” is interpreted in the largest possible way.</p>		

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					All in all, the BAK is of the opinion that the attempt to value the smartness of municipalities by using the presented set of indicators is not adequate nor beneficial.		
		General		Ge	The definition of regional authorities is formulated in such a general way that all municipalities, regardless of their size and number of inhabitants, have to be taken into account, although a part of the indicators and key figures relates to larger cities.	Limitation to administrative districts and larger cities that are not part of an administrative district (kreisfreie Städte), particularly as part of the indicators is only available for administrative districts and larger cities that are not part of an administrative district.	
		5.1, general		Ge	Here and in the following the term “population” is often used in a general way. Which inhabitants are meant by which indicator? Is it about inhabitants at the place of their principal residence or about inhabitants at their place of principal and secondary residence?	Definition to be revised.	
		5.3		Ge	The collection of the data in need for this indicator can lead to conflicts with necessary data security.	Indicator should be given up.	
		6.1		Ge	No data available at municipal level. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		6.2		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a	The use of this indicator should be given up because of methodological reasons.	

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					municipal level and therefore could not guarantee comparability		
		6.3		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a municipal level and therefore could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		6.4		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a municipal level and therefore could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		7.2		Ge	No data available at municipal level. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		7.5		Ge	No data available at municipal level. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		8.1		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		8.2		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	

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		8.3		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		8.4		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		8.6		ed	The term refurbishment is too general. To which extent should be energy-saving-technology be used, to be refurbished enough?	Pretest after re-definition	
		8.7		ed	The term refurbishment is too general. To which extent should be energy-saving-technology be used, to be refurbished enough? What about rented or leased buildings?	Pretest after re-definition	
		9.1		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		9.2		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
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		10.1		ed	The term “smart city innovations and initiatives” is too general. What about spinoff-innovations, that were not intended?	Pretest after re-definition	
		10.2		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a municipal level and therefore could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		10.3		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		11.3		Ge	The number of local-authorities datasets will rather be uncountable.	Indicator should be given up.	
		11.4		Ge	What about services, that are offered by public-driven economies or by private firms, that are working by contract?	Pretest after re-definition	
		11.5		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
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		12.2		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a municipal level and therefore could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		12.3		Ge	No data available at municipal level. The data sources are partly on a regional level, partly on a municipal level and therefore could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		12.4		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		13.1		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		13.3		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		14.1		ed	What about rented or leased buildings?	Pretest after re-definition	
		14.3		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	

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		15.1		Ge	Only a small part of the data required are available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		16.1		ed	How can the area covered be defined precisely.	Pretest after re-definition	
		16.2		ed	What about posts, that officials do as a private person? What about instagram and XING?	Pretest after re-definition	
		17.3		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		18.1		Ge	No data available for local authorities. Indicator is currently only obtained via micro-census, meaning that data is only available for larger cities that are not part of an administrative district and for administrative districts. In addition these are estimates.	The use of this indicator should be given up because of methodological reasons.	
		18.2		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
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		18.4		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability	The use of this indicator should be given up because of methodological reasons.	
		19.2		Ge	No data available for local authorities. The given data sources risk to be very insecure and could not guarantee comparability. Indicator is currently only obtained via micro-census, meaning that data is only available for larger cities that are not part of an administrative district and for administrative districts. In addition these are estimates.	The use of this indicator should be given up because of methodological reasons.	
		19.10			As far, as recent systems obtain their date from logged in mobile phones, this number differs by chance, daytime and usage of those networks. Hence, these data are not reliable and/or comparable.	The use of this indicator should be given up because of methodological reasons.	
		20.2			The data in need is only partly available on local levels. Hence, these data are not reliable and/or comparable.	The use of this indicator should be given up because of methodological reasons.	
		21.1			What about people engaged in social-media-campaigns or free-of-entry workshops? The number of people engaged is actually not counted, therefore only estimated data are available for local authorities. The given data sources risk to	Pretest after re-definition	

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					be very insecure and could not guarantee compa- rability.		
		21.2.			The time for approval depends on the complexity of building legislations and number of building engineers in the local authority. It says nothing about efficiency throughout the building approval department.	Indicator should be given up.	
		22.1			Is the infusion into rivers also “reusage”?	Pretest after re-definition	
		22.2			The data in need is only partly available on local level. Hence, these data are not reliable and/or comparable.	The use of this indicator should be given up be- cause of methodological reasons.	

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