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2 **TO:**
3 Unit 01 – Coordination
4 Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL)
5 European Commission
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9 **European Labour Authority / Inception Impact Assessment**

10
11 First of all, a lot of thanks to Directorate-General for Employment, Social Affairs and Inclusion
12 (DG EMPL / Unit.01) for organising this important consultation.
13

14 This opinion represents an opinion of an individual citizen, not any legal entity.
15

16 This opinion does not contain:

- 17 – any business secrets
 - 18 – any trade secrets
 - 19 – any confidential information.
- 20

21 This opinion is public.

22 PDF file of this opinion can be added to a relevant web page.
23
24

25 Annex 1 holds information about previous consultations on the European Union level.

26 Annex 2 holds information about disclaimers and copyright.
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30 Best Regards,
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34 Jukka S. Rannila
35 citizen of Finland

36 signed electronically
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40 [Continues on the next page]
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42 **About previous consultations and opinions**

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44 Annex 1 holds information about previous consultations and my previous opinions.

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46 Here we can note that I have repeated the same issues based on previous consultations. Different
47 units of the European Commission already know something about my previous opinions.

48
49 **Previous consultation / European Social Security Number / Reference: Ares(2017)5862503**

50
51 Here we can note especially previous consultation about the European Social Security Number.

52
53 EN: Opinion 119: European Social Security Number

54 http://www.jukkarannila.fi/lausunnot.html#nro_119

55
56 This opinion highlights some issues mentioned based on previous consultation about the European
57 Social Security Number.

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59 **Note: Responsible unit for the previous consultation was Unit D2 (Social security**
60 **coordination).**

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64 **Two parts of this opinion / European Social Security Number / European Labour Authority**

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66 This opinion has two parts.

67 (1) First part is especially about the European Labour Authority.

68 (2) Second part repeats some issues about the European Social Security Number.

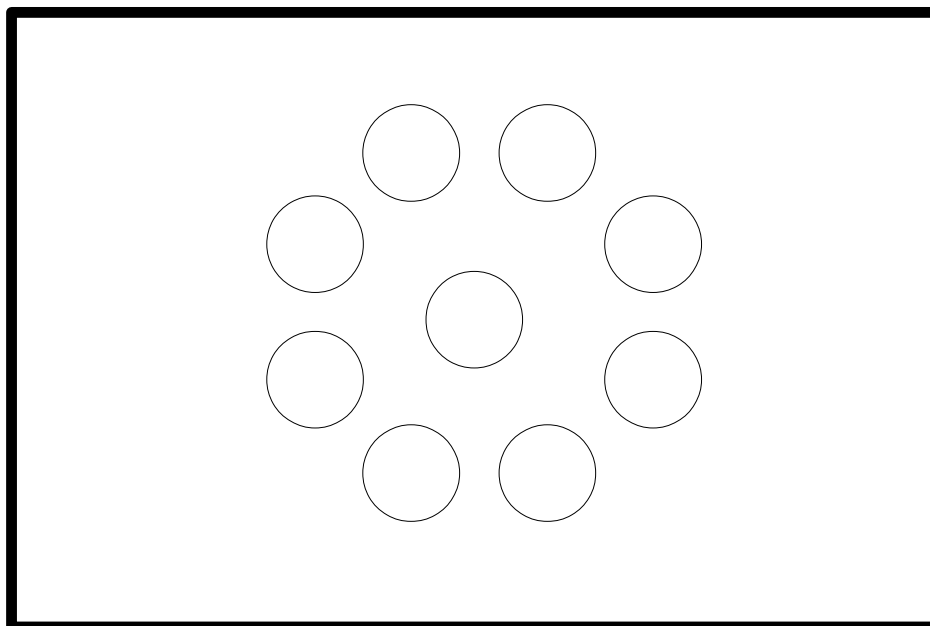
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First Part: About the European Labour Authority

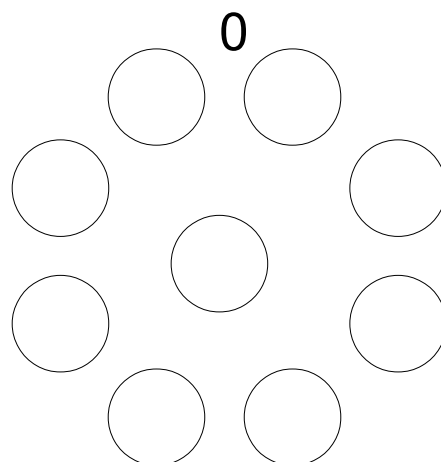
Problem 1: fragmented cooperation arrangements at the EU level

Here we can note that in many cases there can no connections (0) between different systems **in an organisation**. In reality this means that different users has to add same data to different systems.



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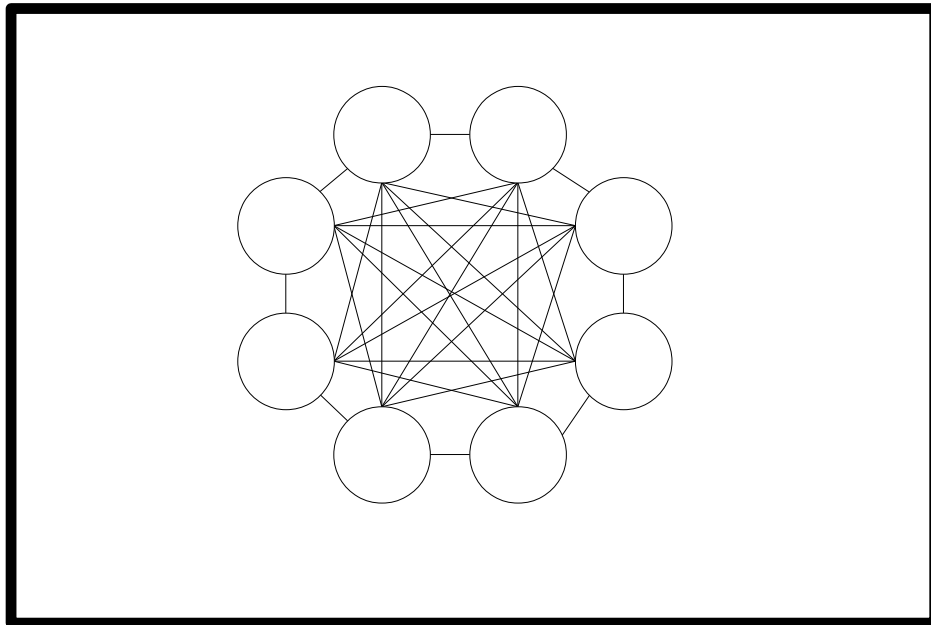
Here we can note that in many cases there can no connections (0) between different systems which are provided by **different organisations**.



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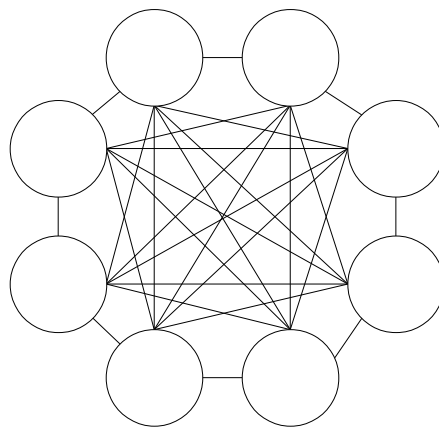
Next option is complex network of system-to-system connections. Complex connections can be

86 naturally **in an organisation or between different organisations**
87



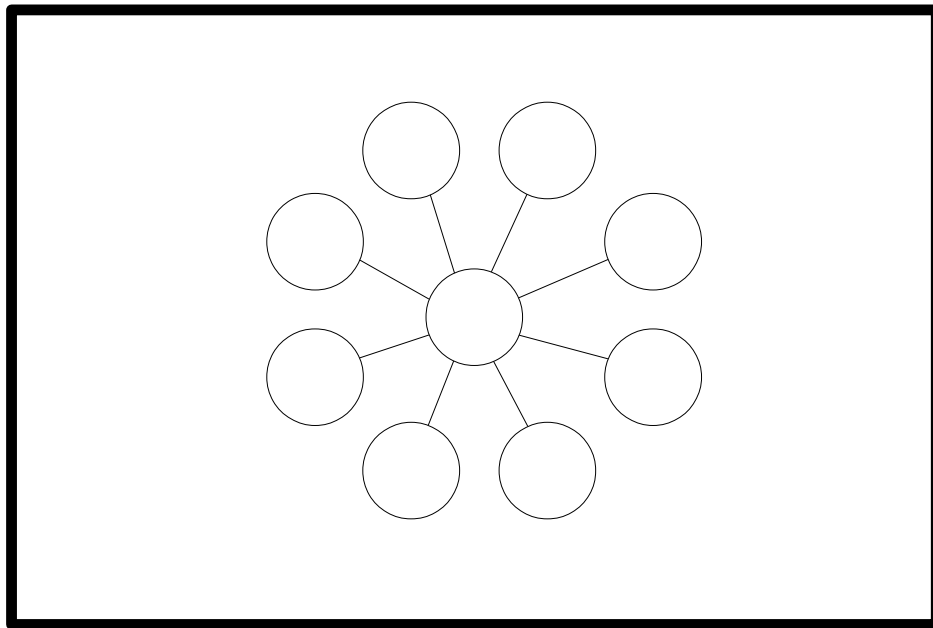
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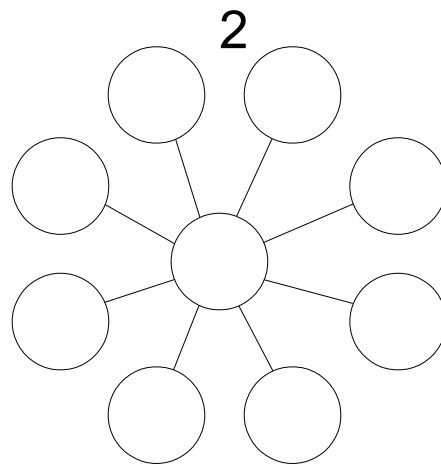


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Next option is one central system with connections to different (sub)systems. Problem with this option are different defects in the central system which means problems with dependent systems.



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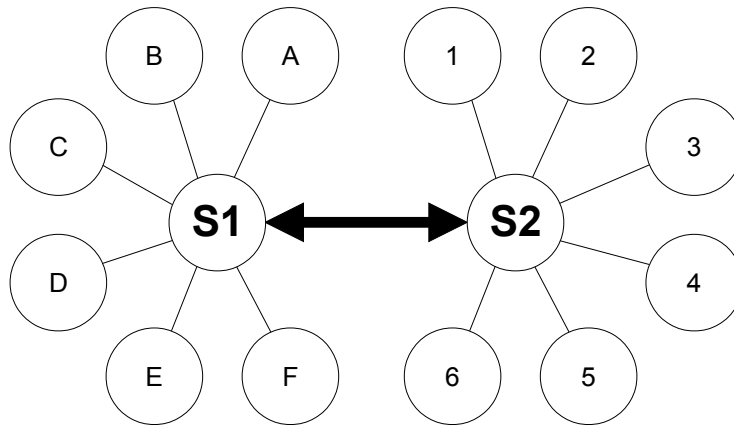


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Here we can note that European Labour Authority could be the provider of a central system.

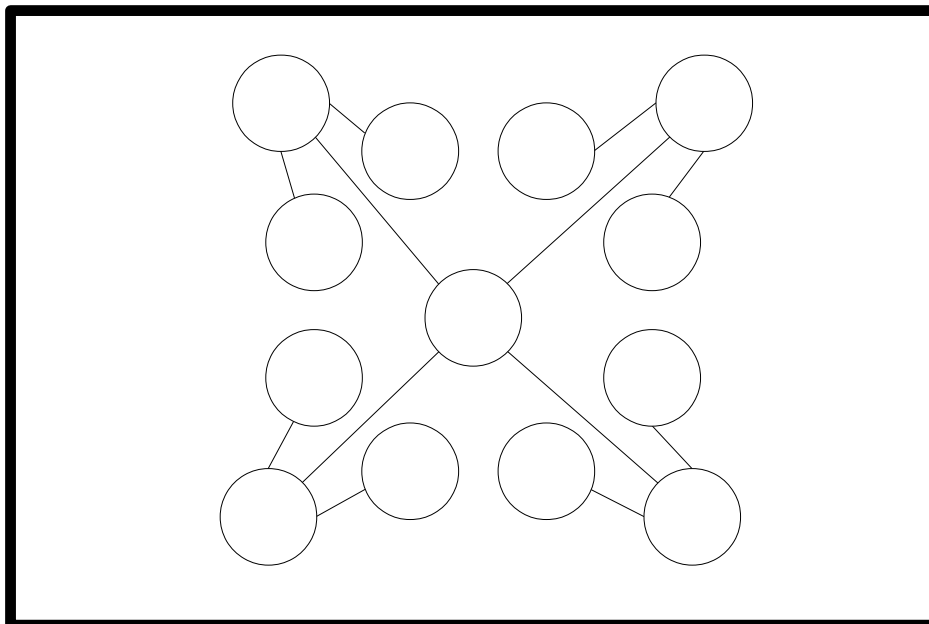
One option is cooperation between some central systems (S1 ↔ S1) which have connections to some other systems.

1-2

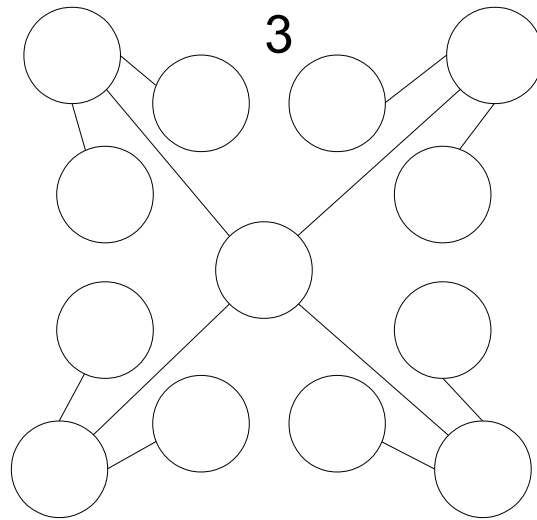


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106 Next option is some hierarchy between systems. There could be a central system but it does not
107 have connections to all other system. This means different subsystems which then can have
108 connection between other systems.



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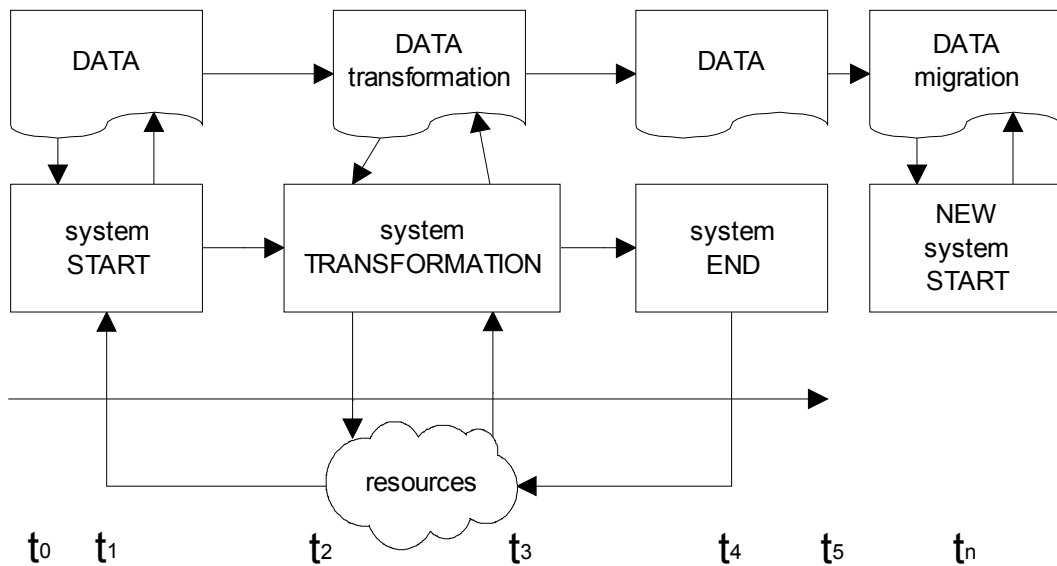
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Proposal: There could be some assessments about hierarchy between different systems.

Note: Second part (2) of this consultations gives some ideas about hierarchy between different (sub)systems on the European Union level.

Here we can note that hierarchy between different systems means less complex system-to-system connections.

Next issue is lifetime for different systems which can handle data. The problem is naturally transfer of data from one old system to one new system.



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Proposal: There could be some assessments of different member state systems.

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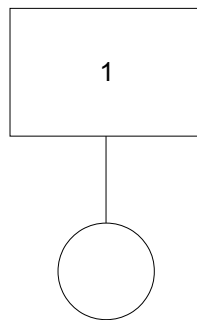
Proposal: There could be some work for consolidating different systems based on lifetime of different systems.

Note: Lifetime of different systems varies.

Note: Possibly it is not possible to consolidate all possible systems at the same time.

Proposal: There could be some timetable for consolidating different systems.

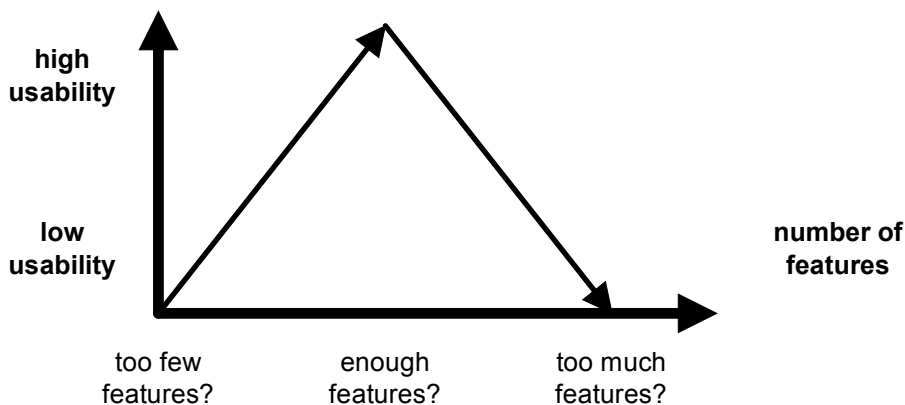
Problem 2: Insufficient/inadequate capacity of competent national authorities to cooperate



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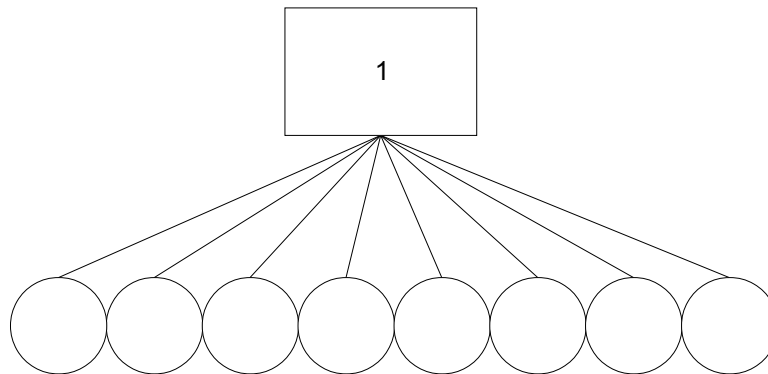
Here we can note that different systems provide one or more displays/interfaces.

The problem with one display/interface is the number of features. There may be too few features or too much features in one display/interface. We need enough features!



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Naturally there should be several displays/interfaces since there are different stakeholders using different systems.



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Proposal: There could be a serious assessment of needed interfaces when using different displays/interfaces.

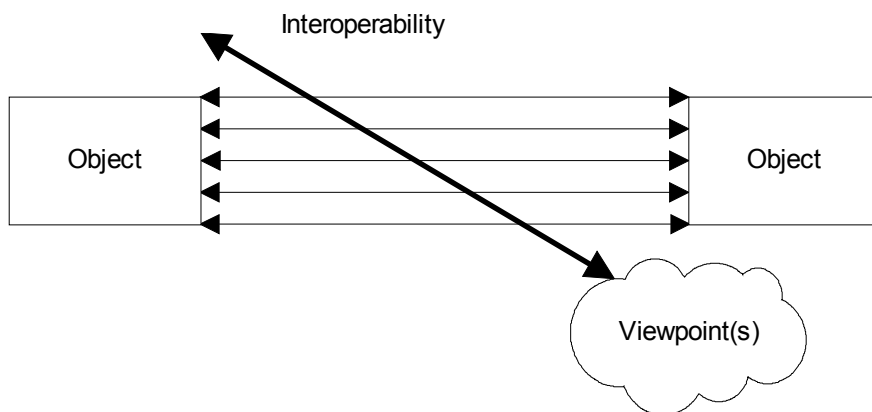
Proposal: There could be a serious assessment of current displays/interfaces.

Proposal: There could be some work for creating several displays/interfaces for different stakeholders.

Opinion: Different displays/interfaces should implement only needed features – not too much or too few features!

Proposal: Different displays/interfaces could take care of linguistic complexity.

Problem 3: Insufficient access to and sharing of information



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Here we can not different viewpoints when creating cooperation between information systems. In reality assessing different viewpoints means some actual time and actual efforts by different stakeholders.

172 **Proposal: There could some serious efforts to gather together all needed viewpoints.**

173

174 **Proposal: Based on different viewpoints it could be easier to create different**
175 **information services.**

176

177 **Note: Some viewpoints may mean creating different displays/interfaces, cf.**
178 **previous problem.**

179

180 **An example for cooperation: Web feeds (RSS and Atom)**

181



182

183

184 I have advocated usage of web feeds ¹ on several previous opinion documents. Actually there are
185 two standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

186

187 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
188 **informations systems (EU / Member states).**

189

190 **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
191 **time) information for different stakeholder(s) (communities).**

192

193 **Proposal: There can be different web feeds (RSS and/or Atom) for different**
194 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
195 **solution.**

196

197 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

198

199 It can be easier to create web feeds in different information systems since web feeds enable
200 connections without direct system-to-system connections.

201

202 It can be noted, that different back-office systems (with a wide variety of different technologies) can
203 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
204 kind solutions front-office systems dont need direct system-to-system communications with back-
205 office systems.

206

1 https://en.wikipedia.org/wiki/Web_feed

2 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

3 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

4 [https://en.wikipedia.org/wiki/Atom_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

5 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

6 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

207

208 **Second Part: Repetition some issues based on the previous consultation: European Social**
209 **Security Number**

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211 **Policy option 3 (Introducing a European format for Social Security Numbers)**

212

213 **The Finnish case**

214

215 In Finland we have Personal Identity Code (Finnish: henkilötunnus (HETU), Swedish:
216 personbeteckning). In Finland Population Register Centre takes care of⁷ the Personal Identity Code.

217

218 An example for Personal Identity Code could following. Format is DDMMYYCZZZQ:

219

220 DDMMYY: date of birth – day, month and year with two digits

221 C: century sign

222 ZZZ the individual number

223 Q: control character (checksum)

224

225 An example could be following: **311280-888Y**.

226

227 One way for issuing European format for Social Security Numbers could use both European Union
228 prefix and member state prefix. The Finnish example (previous example for Personal Identity Code)
229 could be following:

230

231 **EU-FI-311280-888Y**

232

233 Naturally some stakeholders (e.g. some stakeholders in European Economic Area (EEA) members
234 and Switzerland) can resist the “EU” prefix. The Finnish example (previous example for Personal
235 Identity Code) could be following:

236

237 **FI-311280-888Y**

238

239 Naturally a compromise could be “E” (Europe) prefix: The Finnish example (previous example for
240 Personal Identity Code) could be following:

241

242 **E-FI-311280-888Y**

243

244 **Policy option 4 (Introducing a European Social Security Number)**

245

246 Introducing a European Social Security Number could take care for some problems with national
247 social security number. I propose that European Social Security Number could use long format for
248 date of birth. The Finnish example (previous example for Personal Identity Code) the date of birth
249 would mean following part for European Social Security Number.

250

7 <http://vrk.fi/en/personal-identity-code1>, Personal identity code – Population Register Centre

251 **31121980**

252

253 **Day, Month, Year – long format**

254

255 There have been some problems in Finland when we have that short format date (DDMMYY) for
256 Personal Identity Code.

257

258 The next step for European Social Security Number could be creation of the suffix for European
259 Social Security Number. For example the suffix could be six alphanumerical marks.

260

261 **31121980-123ABC**

262

263 Then we could have following three options for European Social Security Number:

264

265 **EU-FI-31121980-123ABC** **“EU” for European Union**

266

267 **E-FI-31121980-123ABC** **“E” for Europe**

268

269 **FI-31121980-123ABC** **Only (member) state suffix**

270

271 **Conclusion about the European prefix (EU / E / only member state prefix)**

272

273 There can be new member states (more than 28) . One member state (United Kingdom, UK) is
274 leaving the European Union. We have to notice that there are also European microstates and states
275 outside of the European Union. Based on that complexity the prefix could be “E”.

276

277 **Proposal: May be the possible European prefix could be just “E”.**

278

279 The European prefix could be just “E” since some new states may later join the European Union.

280

281 The prefix could be just “E” and then the prefix could be the same even though some states can
282 later join the European Union.

283

284 **Note: Naturally there can be other conclusions and only member state prefixes are**
285 **used.**

286

287 **More and more identifiers (ID)**

288

289 In the previous consultations there has been discussion about different identifiers (ID) in the
290 different systems. It can be noted from the previous opinions, that there will be several and different
291 identifiers (ID) for different levels. On the European Union level there can be several identifiers
292 (ID), e.g. following:

293

294

295

- 296 * global identifiers (ID)
297 * EU-wide identifiers (ID)
298 * general member state identifiers (ID)
299 * several identifiers (ID) in member states.
300

301 **Proposal: There could be a systematic review of different identifiers (ID).**
302

303 It can be noted, that some member states (EU) are federations, and different federal states can have
304 their own identifiers (ID).
305

306 Examples of these identifiers are following:
307

- 308 1) Facebook ID for an individual person
- 309 2) Facebook ID for the individual up-dates of individuals
- 310 3) Data Universal Numbering System (D-U-N-S)
- 311 4) Reuters instruments codes (RICs)
- 312 5) Social security code for individual citizens in the European Union member states
- 313 6) Business identity code for a company in an European Union member state
- 314 7) Value added tax code for a company in an European Union member state.
315

316 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
317 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
318 of using IDs from privately owned information systems.
319

320 **More new identifiers (ID)?**
321

322 The current reality is, that there will be more and more IDs, since digitalisation of different areas
323 will result new IDs and/or combination of new and old IDs.
324

325 The creation YET another public ID is not always organised by the European Union, and in some
326 cases the European Union (and member states) just have to accept the reality of some of those
327 public IDs – in some cases even private IDs are the norm. The Reuters Instrumens Codes (RICs) is
328 an example of a near monopoly situation, and some of current private IDs might constitute (near)
329 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
330 General, and it will be interesting to see possible new cases related to private IDs.
331

332 **EU-wide level?**
333

334 I have noted several times that different member state systems (MSS) can interlinked in many ways.
335 This means that co-operation with European Union systems means a lot of work. This leads to the
336 question of a European Contact Point (EUCP) for different member state systems (MSS).
337

338 Naturally there could be direct contacts between different member state systems (MSS) and
339 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
340 number of different member state system. Based on 28 member state systems there could be

341 hundreds of connections:

342

343 $28 \times 10 = 280 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

344 $28 \times 20 = 560 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

345 $28 \times 30 = 840 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

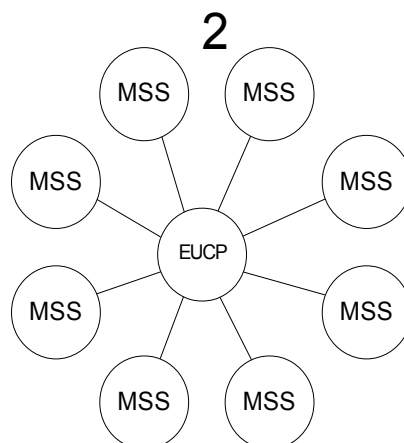
346

347 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 348 there can be member state contact points (MCP). Then there can be some hierarchy between
 349 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 350 with member state systems in member states. Therefore member state contact points (MCP) can
 351 reduce the complexity with European Union contact point (EUCP)

352

353 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 354 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

355



356

357 **MSS = Member State System, EUCP = European Contact Point**

358

359 In the current situation, European Union member states (and some co-operation states) have their
 360 own internal IDs for several information systems. Also, the members states organised as a
 361 federation have their own internal problems with state-level IDs.

362

363 Based on those calculations there could be a lot of direct connections to the European contact point.
 364 Number of those connections can be overwhelming. The situation between member states can vary
 365 in many ways. So there can different and unique systems between member states.

366

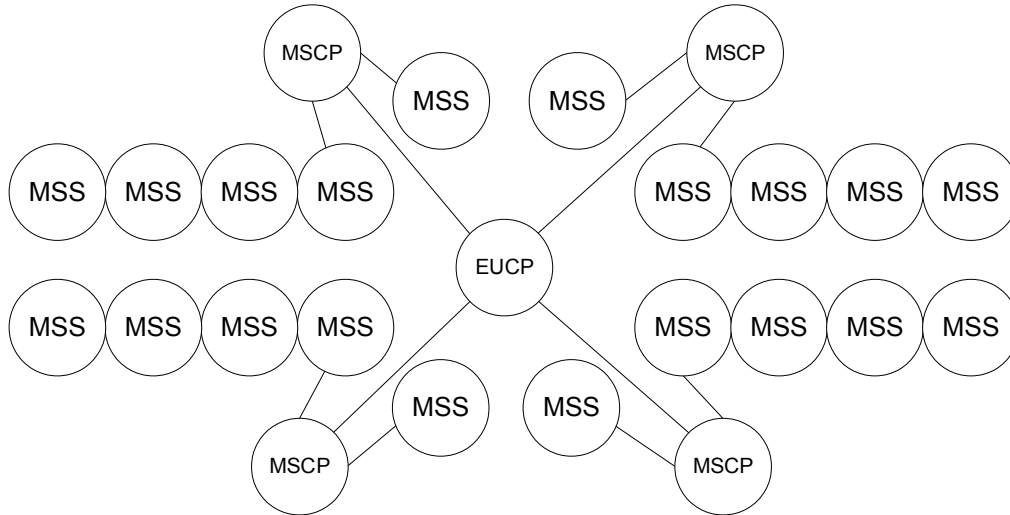
367 On the other hand, there are some working examples of joined or federated EU-wide registers.
 368 However, the amount of administration and needed legally binding agreements is considerable.

369

370 **Proposal : There could be one information system (member state contact point, MSCP)**
 371 **on member state level.**

372

3



MSS = Member State System

MSCP = Member State Contact Point, EUCP = European Contact Point

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The solution can be, that member states have own Member State Contact Points (MSCP) and different state level systems are combined gradually. Then the member state system IDs can be used in the European Contact Point (EUCP).

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Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

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Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations with member state systems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).

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392

Proposal: Different member state systems could be consolidated based on limited number system-to-system connections.

393
394
395

Proposal: There could be some time frames for consolidating different member state systems (MSS) with member state contact points (MSCP).

396
397
398

Proposal: There could be some time frames for consolidating member state contact points (MSCP) with the European Union contact point (EUCP).

399
400
401

Proposal: One information system (member state contact point, MSCP) on member state level could handle system-to-system connections with the European Union level (European contact point).

402

403

Proposal: There could be some serious work for developing a standardised member state contact point (MSCP).

404

405

406

Proposal: After developing a standardised member state contact point (MSCP) different member states could consolidate their systems (MSS ↔ MSCP).

407

408

409

Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European Union level.

410

411

412

Naturally we have to note that developing a standardised member state contact point (MSCP) means more work. On the other hand a standardised member state contact point (MSCP) could handle cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member states may have more systems than other member states. We have to note that there are different systems based on several technological solutions.

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About different standards

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I have proposed several times to use *open horizontal standards* when developing different information system.

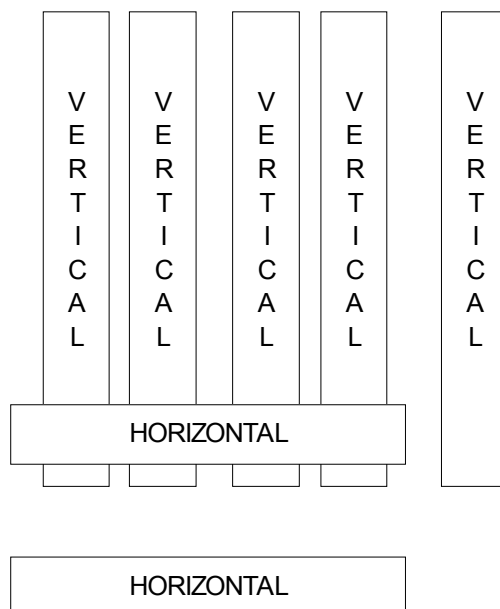
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Favouring open standards / Favouring horizontal standards

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428

There are differences between horizontal and vertical standards. A simple example is naturally email solutions. There are several vertical standards when creating technically email solutions. Then

429

430 there are horizontal standards which enable sending messages between technically different email
431 solutions.

432

433 **Proposal: There could be assessment of vertical and horizontal standards.**

434

435 **Proposal: Using horizontal standards could be favoured when creating different**
436 **information systems on the European Union level.**

437

438 Horizontal standards enables technological solutions which can work together. Horizontal standards
439 hides different complexities in information systems.

440

441 **Opinion: The number of redundant standardisation efforts should be minimal.**

442

443 **Proposal: There could be separation of horizontal standards and vertical standards.**

444

445 **Proposal: There could be different standardisation efforts to horizontal standards and**
446 **vertical standards.**

447

448 Personally I have advocated using different horizontal standards. For example email standards
449 (horizontal) are implemented with very different technologies (vertical).

450

451 Here we can note some problems:

452

453

- 454 • some systems are based on **de-facto** standards
- 455 • some systems are based on **de-jure** standards
- 456 • there can be confrontations between **de-facto** and **de-jure** standards
- 457 • there can be a monopoly situation in some domain
- 458 • some standards may inhibit possible actions of some stakeholders
- 459 • there can be a standard war on some domains
- 460 • standards have different life-cycles
- 461 • systems have different life-cycles
- 462 • there can be mismatches between different life-cycles
- 463 • there can be failed standards
- 464 • there can be deprecated standards.

465

466 It is quite normal situation in the information technology field that there are competing standards
467 for some application field. Therefore there are all the time ongoing “standards wars” or “format
468 wars”. The information technology standards tend to be interrelated and one “standards war” or
469 “format war” can lead to another similar situation.

470

471 I have advocated open standards even though in some cases open standards are not de facto
472 standards. In practice public sector has very important role, when some standards are competing in
473 the market place. Because public sector has a considerable power when buying/developing
474 information systems and therefore public sector can sometimes direct markets to certain standards.

475 Therefore there should be serious vigilance when assessing different standards and “standards” in
476 some application fields.

477

478 **Needs for standardisation?**

479

480 After this consultation there could be some serious work for assessing different needs for
481 standardisation. I have advocated open horizontal standards when giving opinions to different
482 stakeholders.

483

484 **More technical consultations?**

485

486 Based on answers (consultation generally) there could be more technically oriented consultations.
487 Previously mentioned issues (this opinion) could be detailed for new technically oriented
488 consultations.

489

490 **Proposal: More technically oriented consultations could be organised after this**
491 **consultation.**

492

493 For example different technical standards could be assessed carefully.

494

495

496

497 **Good luck!!!**

498

499 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
500 opinions. This remains to be seen.

501

502

503 [Continues on the next page]

504

505

ANNEX 1

506

507 My opinions to the previous and relevant consultations – there consultations were mostly organised
508 by the European Commission. General page to all consultations – both in English and in Finnish:

509 <http://www.jukkarannila.fi/lausunnot.html>

510

511

512 My opinions to the previous and relevant consultations – there consultations were mostly organised
513 by the European Commission.

514

515 EN: Opinion 1: Review of the rules on access to documents

516 http://www.jukkarannila.fi/lausunnot.html#nro_1

517

518 EN: Opinion 2: Schools for the 21st Century

519 http://www.jukkarannila.fi/lausunnot.html#nro_2

520

521 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
522 Safe and Innovative medicines

523 http://www.jukkarannila.fi/lausunnot.html#nro_3

524

525 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

526 http://www.jukkarannila.fi/lausunnot.html#nro_5

527

528 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

529 http://www.jukkarannila.fi/lausunnot.html#nro_6

530

531 EN: Opinion 8: European Interoperability Framework, version 2, draft

532 http://www.jukkarannila.fi/lausunnot.html#nro_8

533

534 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
535 proposal for comments

536 http://www.jukkarannila.fi/lausunnot.html#nro_9

537

538 EN: Opinion 15: Collective Redress

539 http://www.jukkarannila.fi/lausunnot.html#nro_15

540

541 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

542 http://www.jukkarannila.fi/lausunnot.html#nro_17

543

544 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

545 http://www.jukkarannila.fi/lausunnot.html#nro_18

546

547 EN: Opinion 19: Official Acknowledgement by the Commission

548 http://www.jukkarannila.fi/lausunnot.html#nro_19

549

- 550 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
551 http://www.jukkarannila.fi/lausunnot.html#nro_20
552
- 553 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
554 http://www.jukkarannila.fi/lausunnot.html#nro_21
555
- 556 EN: Opinion 23: Public consultation on the review of the European Standardisation System
557 http://www.jukkarannila.fi/lausunnot.html#nro_23
558
- 559 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
560 http://www.jukkarannila.fi/lausunnot.html#nro_27
561
- 562 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
563 http://www.jukkarannila.fi/lausunnot.html#nro_28
564
- 565 EN: Opinion 30: Internet Filtering
566 http://www.jukkarannila.fi/lausunnot.html#nro_30
567 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
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- 569 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
570 http://www.jukkarannila.fi/lausunnot.html#nro_32
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- 572 EN: Opinion 34: REMIT Registration Format
573 http://www.jukkarannila.fi/lausunnot.html#nro_34
574 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
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- 576 EN: Opinion 35: Exploiting the employment potential of the personal and household services
577 http://www.jukkarannila.fi/lausunnot.html#nro_35
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- 579 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
580 http://www.jukkarannila.fi/lausunnot.html#nro_37
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- 582 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
583 http://www.jukkarannila.fi/lausunnot.html#nro_39
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- 585 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
586 http://www.jukkarannila.fi/lausunnot.html#nro_40
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- 588 EN: Opinion 41: AT.39398: observations on the proposed commitments
589 http://www.jukkarannila.fi/lausunnot.html#nro_41
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- 591 EN: Opinion 42: Opening up Education
592 http://www.jukkarannila.fi/lausunnot.html#nro_42

⁸ <http://www.cen.eu/> (Accessed 2 July 2012)

⁹ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

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594 EN: Opinion 43: Publication of extracts of the European register of market participants
595 http://www.jukkarannila.fi/lausunnot.html#nro_43
596 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
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598 EN: Opinion 44: Evaluation policy guidelines
599 http://www.jukkarannila.fi/lausunnot.html#nro_44
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601 EN: Opinion 45: About ICT standardisation
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604 EN: Opinion 46: Review of the EU copyright rules
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607 EN: Opinion 51: European Area of Skills and Qualifications
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610 EN: Opinion 52: Trusted Cloud Europe Survey
611 http://www.jukkarannila.fi/lausunnot.html#nro_52
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613 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
614 http://www.jukkarannila.fi/lausunnot.html#nro_53
615 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
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617 EN: Opinion 55: European Energy Regulation
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619 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
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621 EN: Opinion 59: Green paper on mobile Health
622 http://www.jukkarannila.fi/lausunnot.html#nro_59
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624 EN: Opinion 60: Cross-border inheritance tax problems within the EU
625 http://www.jukkarannila.fi/lausunnot.html#nro_60
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627 EN: Opinion 61: European Register of Products Containing Nanomaterials
628 http://www.jukkarannila.fi/lausunnot.html#nro_61
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630 EN: Opinion 64: Corporate Social Responsibility - European Commission
631 http://www.jukkarannila.fi/lausunnot.html#nro_64
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633 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
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- 638 EN: Opinion 68: European Network Code Stakeholder Committees
639 http://www.jukkarannila.fi/lausunnot.html#nro_68
640 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
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642 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
643 http://www.jukkarannila.fi/lausunnot.html#nro_71
644 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
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646 EN: Opinion 74: Enabling the Internet of Things
647 http://www.jukkarannila.fi/lausunnot.html#nro_74
648 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
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650 EN: Opinion 80: Mandatory Transparency Register
651 http://www.jukkarannila.fi/lausunnot.html#nro_80
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653 EN: Opinion 84: Revision of the European Interoperability Framework
654 http://www.jukkarannila.fi/lausunnot.html#nro_84
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656 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
657 http://www.jukkarannila.fi/lausunnot.html#nro_86
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659 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
660 http://www.jukkarannila.fi/lausunnot.html#nro_88
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662 EN: Opinion 89: BEREC Guidelines for net neutrality rules
663 http://www.jukkarannila.fi/lausunnot.html#nro_89
664 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
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666 EN: Opinion 93: Safety of apps and other non-embedded software
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669 EN: Opinion 95: Targeted consultation on eForms
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672 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
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680 http://www.jukkarannila.fi/lausunnot.html#nro_99
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¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

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- 683 EN: Opinion 100: Protection of personal data (EU)
- 684 http://www.jukkarannila.fi/lausunnot.html#nro_100
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- 686 EN: Opinion 101: Governance of the Energy Union
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- 689 EN: Opinion 102: Smart Wearables
- 690 http://www.jukkarannila.fi/lausunnot.html#nro_102
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- 692 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
- 693 (ENISA)
- 694 http://www.jukkarannila.fi/lausunnot.html#nro_106
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- 696 EN: Opinion 108: Single Digital Gateway
- 697 http://www.jukkarannila.fi/lausunnot.html#nro_108
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- 699 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
- 700 http://www.jukkarannila.fi/lausunnot.html#nro_110
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- 702 EN: Opinion 111: Interoperability of information systems for migration and security
- 703 http://www.jukkarannila.fi/lausunnot.html#nro_111
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- 705 EN: Opinion 113: Transform of health and care
- 706 http://www.jukkarannila.fi/lausunnot.html#nro_113
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- 708 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
- 709 Internet
- 710 http://www.jukkarannila.fi/lausunnot.html#nro_114
- 711 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
- 712
- 713 EN: Opinion 118: Fake news and online disinformation
- 714 http://www.jukkarannila.fi/lausunnot.html#nro_118
- 715
- 716 EN: Opinion 119: European Social Security Number
- 717 http://www.jukkarannila.fi/lausunnot.html#nro_119
- 718
- 719
- 720 My opinions to the previous and relevant consultations – there consultations were mostly organised
- 721 by the European Commission. General page to all consultations – both in English and in Finnish:
- 722 <http://www.jukkarannila.fi/lausunnot.html>
- 723
- 724 [Continues on the next page]

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ANNEX 2

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