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2 TO:

3 Unit D2 – Social security coordination

4 Directorate-General for Employment, Social Affairs and Inclusion

5 European Commission

6

7 **European Social Security Number / Reference: Ares(2017)5862503**

8

9 First of all, a lot of thanks to Directorate-General for Employment, Social Affairs and Inclusion
10 (Unit D2) for organising this important consultation.

11

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

13

14 This opinion does not contain:

15 – any business secrets

16 – any trade secrets

17 – any confidential information.

18

19 This opinion is public.

20 PDF file of this opinion can be added to a relevant web page.

21

22

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

24 Annex 2 holds information about disclaimers and copyright.

25

26

27

28 Best Regards,

29

30

31

32 Jukka S. Rannila

33 citizen of Finland

34

35 signed electronically

36

37

38 [Continues on the next page]

39

40

41 About previous consultations and opinions

42

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

44

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

47

48 More and more identifiers (ID)

49

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

54

55 * global identifiers (ID)

56 * EU-wide identifiers (ID)

57 * general member state identifiers (ID)

58 * several identifiers (ID) in member states.

59

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

61

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

64

65 Examples of these identifiers are following:

66

67 1) Facebook ID for an individual person

68 2) Facebook ID for the individual up-dates of individuals

69 3) Data Universal Numbering System (D-U-N-S)

70 4) Reuters instruments codes (RICs)

71 5) Social security code for individual citizens in the European Union member states

72 6) Business identity code for a company in an European Union member state

73 7) Value added tax code for a company in an European Union member state.

74

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

78

79 More new identifiers (ID)?

80

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

83

84 The creation YET another public ID is not always organised by the European Union, and in some

85 cases the European Union (and member states) just have to accept the reality of some of those
 86 public IDs – in some cases even private IDs are the norm. The Reuters Instruments Codes (RICs) is
 87 an example of a near monopoly situation, and some of current private IDs might constitute (near)
 88 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
 89 General, and it will be interesting to see possible new cases related to private IDs.

90

91 **EU-wide level?**

92

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

96

97 Naturally there could be direct contacts between different member state systems (MSS) and
 98 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
 99 number of different member state system. Based on 28 member state systems there could be
 100 hundreds of connections:

101

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

102

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

103

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

104

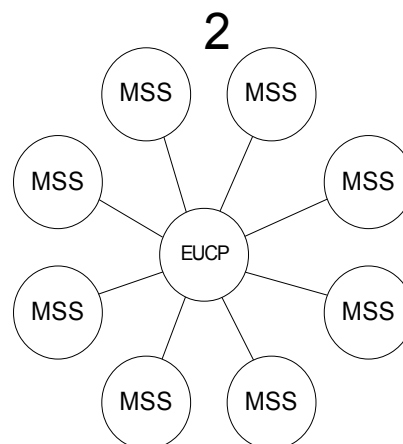
105

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

111

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

114



115

116

MSS = Member State System, EUCP = European Contact Point

117

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

121

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

125

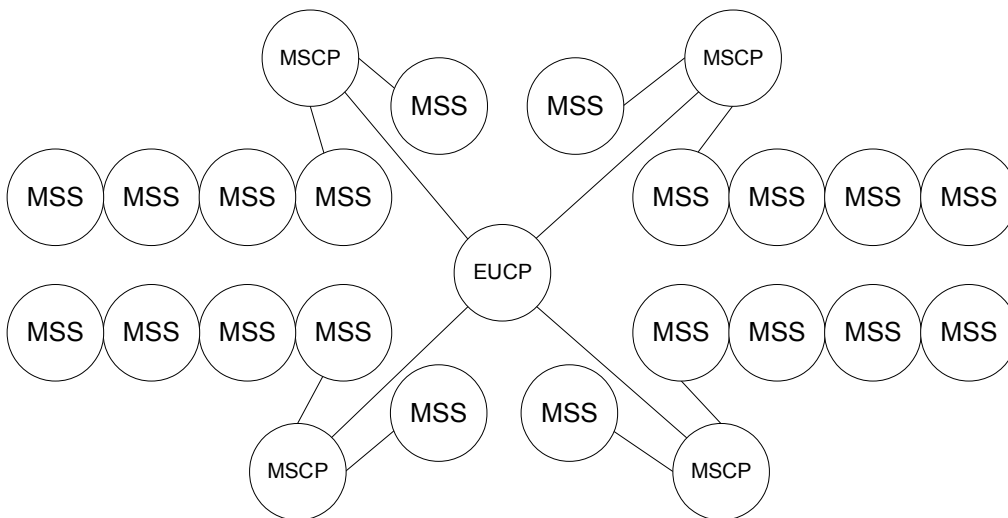
126 On the other hand, there are some working examples of joined or federated EU-wide registers.
 127 However, the amount of administration and needed legally binding agreements is considerable.

128

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

131

3



132

133

134 **MSS = Member State System**
 135 **MSCP = Member State Contact Point, EUCP = European Contact Point**

136

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

140

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

143

144 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 145 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

146 with member state systems in member states. Therefore member state contact points (MCP) can
147 reduce the complexity with European Union contact point (EUCP).

148

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

151

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

154

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

157

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

161

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

164

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

167

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

171

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

177

178 **About different standards**

179

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

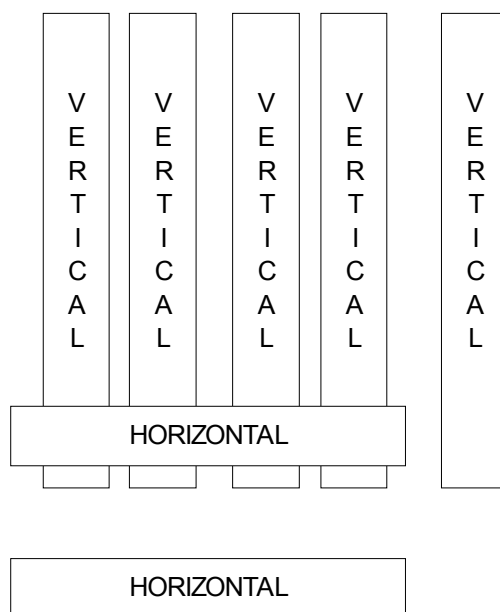
182

183 **Favouring open standards / Favouring horizontal standards**

184

185

186 [Continues on the next page]



187
188

189 There are differences between horizontal and vertical standards. A simple example is naturally
190 email solutions. There are several vertical standards when creating technically email solutions. Then
191 there are horizontal standards which enable sending messages between technically different email
192 solutions.

193

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

195

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

198

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

201

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

203

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

205

206 **Proposal: There could be different standardisation efforts to horizontal standards and**
207 **vertical standards.**

208

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

211

212 Here we can note some problems:

213

214

- 215 • some systems are based on **de-facto** standards
- 216 • some systems are based on **de-jure** standards
- 217 • there can be confrontations between **de-facto** and **de-jure** standards
- 218 • there can be a monopoly situation in some domain
- 219 • some standards may inhibit possible actions of some stakeholders
- 220 • there can be a standard war on some domains
- 221 • standards have different life-cycles
- 222 • systems have different life-cycles
- 223 • there can be mismatches between different life-cycles
- 224 • there can be failed standards
- 225 • there can be deprecated standards.

226

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

231

232 I have advocated open standards even though in some cases open standards are not de facto
233 standards. In practice public sector has very important role, when some standards are competing in
234 the market place. Because public sector has a considerable power when buying/developing
235 information systems and therefore public sector can sometimes direct markets to certain standards.
236 Therefore there should be serious vigilance when assessing different standards and “standards” in
237 some application fields.

238

239 **Needs for standardisation?**

240

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

244

245 **The Finnish case**

246

247 In Finland we have Personal Identity Code (Finnish: henkilötunnus (HETU), Swedish:
248 personbeteckning). In Finland Population Register Centre takes care of¹ the Personal Identity Code.

249

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

251

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

253 C: century sign

254 ZZZ the individual number

255 Q: control character (checksum)

256

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

258

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

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

260

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

264

265 **EU-FI-311280-888Y**

266

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

270

271 **FI-311280-888Y**

272

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

275

276 **E-FI-311280-888Y**

277

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

279

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

284

285 **31121980**

286

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

288

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

291

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

294

295 **31121980-123ABC**

296

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

298

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

300

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

302

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

304
305 **Conclusion about the European prefix (EU / E / only member state prefix)**
306

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

310
311 **Proposal: May be the possible European prefix could be just “E”.**

312
313 The European prefix could be just “E” since some new states may later join the European Union.

314
315 The prefix could be just “E” and then the prefix could be the same even though some states can
316 later join the European Union.

317
318 **Note: Naturally there can be other conclusions and only member state prefixes are**
319 **used.**

320
321 **More technical consultations?**

322
323 Based on answers (consultation generally) there could be more technically oriented consultations.
324 Previously mentioned issues (this opinion) could be detailed for new technically oriented
325 consultations.

326
327 **Proposal: More technically oriented consultations could be organised after this**
328 **consultation.**

329
330 For example different technical standards could be assessed carefully.

331
332
333
334 **Good luck!!!**

335
336 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
337 opinions. This remains to be seen.

338
339
340 [Continues on the next page]

341

ANNEX 1

342

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

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

346

347

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

350

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

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

353

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

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

356

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

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

360

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

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

363

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

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

366

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

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

369

370 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
371 proposal for comments

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

373

374 EN: Opinion 15: Collective Redress

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

376

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

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

379

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

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

382

383 EN: Opinion 19: Official Acknowledgement by the Commission

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

385

- 386 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
387 http://www.jukkarannila.fi/lausunnot.html#nro_20
388
- 389 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
390 http://www.jukkarannila.fi/lausunnot.html#nro_21
391
- 392 EN: Opinion 23: Public consultation on the review of the European Standardisation System
393 http://www.jukkarannila.fi/lausunnot.html#nro_23
394
- 395 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
396 http://www.jukkarannila.fi/lausunnot.html#nro_27
397
- 398 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
399 http://www.jukkarannila.fi/lausunnot.html#nro_28
400
- 401 EN: Opinion 30: Internet Filtering
402 http://www.jukkarannila.fi/lausunnot.html#nro_30
403 NOTE: Organised by the European Committee for Standardization (CEN) ²
404
- 405 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
406 http://www.jukkarannila.fi/lausunnot.html#nro_32
407
- 408 EN: Opinion 34: REMIT Registration Format
409 http://www.jukkarannila.fi/lausunnot.html#nro_34
410 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ³
411
- 412 EN: Opinion 35: Exploiting the employment potential of the personal and household services
413 http://www.jukkarannila.fi/lausunnot.html#nro_35
414
- 415 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
416 http://www.jukkarannila.fi/lausunnot.html#nro_37
417
- 418 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
419 http://www.jukkarannila.fi/lausunnot.html#nro_39
420
- 421 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
422 http://www.jukkarannila.fi/lausunnot.html#nro_40
423
- 424 EN: Opinion 41: AT.39398: observations on the proposed commitments
425 http://www.jukkarannila.fi/lausunnot.html#nro_41
426
- 427 EN: Opinion 42: Opening up Education
428 http://www.jukkarannila.fi/lausunnot.html#nro_42

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

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

- 429
- 430 EN: Opinion 43: Publication of extracts of the European register of market participants
- 431 http://www.jukkarannila.fi/lausunnot.html#nro_43
- 432 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
- 433
- 434 EN: Opinion 44: Evaluation policy guidelines
- 435 http://www.jukkarannila.fi/lausunnot.html#nro_44
- 436
- 437 EN: Opinion 45: About ICT standardisation
- 438 http://www.jukkarannila.fi/lausunnot.html#nro_45
- 439
- 440 EN: Opinion 46: Review of the EU copyright rules
- 441 http://www.jukkarannila.fi/lausunnot.html#nro_46
- 442
- 443 EN: Opinion 51: European Area of Skills and Qualifications
- 444 http://www.jukkarannila.fi/lausunnot.html#nro_51
- 445
- 446 EN: Opinion 52: Trusted Cloud Europe Survey
- 447 http://www.jukkarannila.fi/lausunnot.html#nro_52
- 448
- 449 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
- 450 http://www.jukkarannila.fi/lausunnot.html#nro_53
- 451 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
- 452
- 453 EN: Opinion 55: European Energy Regulation
- 454 http://www.jukkarannila.fi/lausunnot.html#nro_55
- 455 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
- 456
- 457 EN: Opinion 59: Green paper on mobile Health
- 458 http://www.jukkarannila.fi/lausunnot.html#nro_59
- 459
- 460 EN: Opinion 60: Cross-border inheritance tax problems within the EU
- 461 http://www.jukkarannila.fi/lausunnot.html#nro_60
- 462
- 463 EN: Opinion 61: European Register of Products Containing Nanomaterials
- 464 http://www.jukkarannila.fi/lausunnot.html#nro_61
- 465
- 466 EN: Opinion 64: Corporate Social Responsibility - European Commission
- 467 http://www.jukkarannila.fi/lausunnot.html#nro_64
- 468
- 469 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
- 470 http://www.jukkarannila.fi/lausunnot.html#nro_66
- 471
- 472
- 473

- 474 EN: Opinion 68: European Network Code Stakeholder Committees
475 http://www.jukkarannila.fi/lausunnot.html#nro_68
476 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
477
478 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
479 http://www.jukkarannila.fi/lausunnot.html#nro_71
480 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
481
482 EN: Opinion 74: Enabling the Internet of Things
483 http://www.jukkarannila.fi/lausunnot.html#nro_74
484 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁴
485
486 EN: Opinion 80: Mandatory Transparency Register
487 http://www.jukkarannila.fi/lausunnot.html#nro_80
488
489 EN: Opinion 84: Revision of the European Interoperability Framework
490 http://www.jukkarannila.fi/lausunnot.html#nro_84
491
492 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
493 http://www.jukkarannila.fi/lausunnot.html#nro_86
494
495 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
496 http://www.jukkarannila.fi/lausunnot.html#nro_88
497
498 EN: Opinion 89: BEREC Guidelines for net neutrality rules
499 http://www.jukkarannila.fi/lausunnot.html#nro_89
500 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
501
502 EN: Opinion 93: Safety of apps and other non-embedded software
503 http://www.jukkarannila.fi/lausunnot.html#nro_93
504
505 EN: Opinion 95: Targeted consultation on eForms
506 http://www.jukkarannila.fi/lausunnot.html#nro_95
507
508 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
509 http://www.jukkarannila.fi/lausunnot.html#nro_97
510
511 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
512 http://www.jukkarannila.fi/lausunnot.html#nro_98
513
514 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
515 Regulators. Recast
516 http://www.jukkarannila.fi/lausunnot.html#nro_99
517

⁴ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 518
519 EN: Opinion 100: Protection of personal data (EU)
520 http://www.jukkarannila.fi/lausunnot.html#nro_100
521
522 EN: Opinion 101: Governance of the Energy Union
523 http://www.jukkarannila.fi/lausunnot.html#nro_101
524
525 EN: Opinion 102: Smart Wearables
526 http://www.jukkarannila.fi/lausunnot.html#nro_102
527
528 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
529 (ENISA)
530 http://www.jukkarannila.fi/lausunnot.html#nro_106
531
532 EN: Opinion 108: Single Digital Gateway
533 http://www.jukkarannila.fi/lausunnot.html#nro_108
534
535 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
536 http://www.jukkarannila.fi/lausunnot.html#nro_110
537
538 EN: Opinion 111: Interoperability of information systems for migration and security
539 http://www.jukkarannila.fi/lausunnot.html#nro_111
540
541 EN: Opinion 113: Transform of health and care
542 http://www.jukkarannila.fi/lausunnot.html#nro_113
543
544 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
545 Internet
546 http://www.jukkarannila.fi/lausunnot.html#nro_114
547 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
548
549 EN: Opinion 118: Fake news and online disinformation
550 http://www.jukkarannila.fi/lausunnot.html#nro_118
551
552
553
554 My opinions to the previous and relevant consultations – there consultations were mostly organised
555 by the European Commission. General page to all consultations – both in English and in Finnish:
556 <http://www.jukkarannila.fi/lausunnot.html>
557
558
559 [Continues on the next page]

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591 Use of broken English

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