

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35

TO:  
European Commission

**Reference: COM(2020) 767 final, 2020/0340 (COD)**

First of all, a lot of thanks to European Commission for organising this important consultation.

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

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

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

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

Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila  
citizen of Finland

signed electronically

[Continues on the next page]

36

**37 About previous consultations / Repeating several issues**

38

39 Annex 1 holds information about previous consultations. I have repeated the same issues several  
40 times and previous consultation documents can be assessed critically. Different units of the  
41 European Commission already know something about my previous opinions.

42

**43 Highlighting only some issues**

44

45 This opinion does not handle all issues which are mentioned on the consultation document. I have  
46 presented different issues to different units of the European Commission. Generally speaking many  
47 proposals are already implemented and therefore I don't present all possible issues based on this  
48 consultation.

49

**50 Consultation document is technologically neutral and does not mentioning any company  
51 names**

52

53 It is fully understandable that the consultation document is technologically neutral. It is also fully  
54 understandable that the consultation document does not mention specific company names.

55

**56 Previous opinion related to this consultation**

57

58 I gave following opinion when the roadmap of this consultation was assessed.

59

**60 EN: Opinion 165: Legislative framework for the governance of common European  
61 data spaces**

62 [http://www.jukkarannila.fi/lausunnot.html#nro\\_165](http://www.jukkarannila.fi/lausunnot.html#nro_165)

63

**64 Some issues based on the proposed legislation**

65

66 Article 8 of the proposed legislation contains following text.

67

**68 Article 8**

69 Single information point

70

71 (1) Member States shall ensure that all relevant information concerning the application of  
72 Articles 5 and 6 is available through a single information point.

73

74 (2) The single information point shall receive requests for the re-use of the categories of data  
75 referred to in Article 3 (1) and shall transmit them to the competent public sector bodies, or  
76 the competent bodies referred to in Article 7 (1), where relevant. The single information  
77 point shall make available by electronic means a register of available data resources  
78 containing relevant information describing the nature of available data.

79

80 I have advocated several times single information points for member state information systems and

81 European Union single information point. Proposed legislation proposes single information points.

82

83 Article 11 of the proposed legislation contains following text.

84

85 **Article 11**

86 Conditions for providing data sharing services

87 (4)

88 the provider shall facilitate the exchange of the data in the format in which it receives it from

89 the data holder and shall convert the data into specific formats only to enhance

90 interoperability within and across sectors or if requested by the data user or where mandated

91 by Union law or to ensure harmonisation with international or European data standards;

92

93 I have highlighted differences between vertical standards and horizontal standards when

94 standardising information systems. **I repeat that opinion.**

95

96 I have presented web feeds (RSS and Atom) as an example of horizontal standard. **I repeat that**

97 **opinion.**

98

99 Article 27 of the proposed legislation contains following text.

100

101 **Article 27**

102 Tasks of the Board

103

104 (d)

105 to assist the Commission in enhancing the interoperability of data as well as data

106 sharing services between different sectors and domains, building on existing

107 European, international or national standards;

108

109 Here I note that proposed European Data Innovation Board can handle very technical issues.

110

111 **Opinion: European Data Innovation Board could propose very technical consultations**  
112 **about different technical standards.**

113

114 Here I note that different standards can be very technical and detailed.

115

116 **Opinion: European Commission could organise consultations (Have your say) for**  
117 **assessing technical standards.**

118

119

120

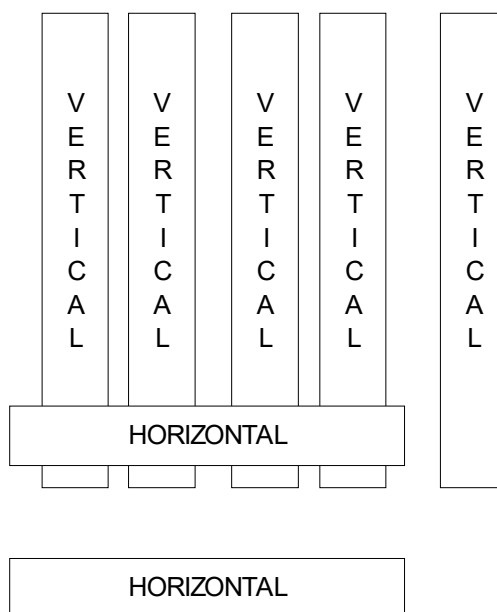
121

122 **Repetition of previous opinions**

123

124 **Favouring horizontal standards**

125



126  
127

128 There are differences between horizontal and vertical standards. A simple example is naturally  
129 email solutions. There are several vertical standards when creating technically email solutions. Then  
130 there are horizontal standards which enable sending messages between technically different email  
131 solutions.

132

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

134

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

137

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

140

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

142

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

144

145 **Proposal: There could be different standardisation efforts to horizontal standards and**  
146 **vertical standards.**

147

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

150

151

152 Here we can note some problems:

153

- 154 • some systems are based on **de-facto** standards
- 155 • some systems are based on **de-jure** standards
- 156 • there can be confrontations between **de-facto** and **de-jure** standards
- 157 • there can be a monopoly situation in some domain
- 158 • some standards may inhibit possible actions of some stakeholders
- 159 • there can be a standard war on some domains
- 160 • standards have different life-cycles
- 161 • systems have different life-cycles
- 162 • there can be mismatches between different life-cycles
- 163 • there can be failed standards
- 164 • there can be deprecated standards.

165

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

170

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

177

178 There are different standards setting organisations on the information technology field. One list <sup>1</sup> of  
179 these standards setting organisations is provided by ConsortiumInfo.org.

180

181 One warning can be said about standards setting organisations. All standards setting organisations  
182 are not successes based on several factors and there can may irrelevant standards setting  
183 organisations. Market situation on different vehicle markets varies a lot based on different factors.

184

185 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**  
186 **different standard setting organisations could be assessed carefully.**

187

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

190

191 **Proposal: Governments should especially concentrate on horizontal standards.**

192

193 **Proposal: Some government agencies could apply for memberships of different**  
194 **standard setting organisations which develop especially horizontal standards.**

195

196 **Proposal: Government agencies should not be passive by-standers when different**  
197 **horizontal standards are developed.**

1 Standard Setting Organizations and Standards List, [www.consortiuminfo.org/links/linksall.php](http://www.consortiuminfo.org/links/linksall.php)

198

199

**Proposal: Government agencies could financially support development of horizontal standards.**

200

201

202

**Proposal: There could some guidance for using open horizontal standards on different application fields.**

203

204

205

206

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

207



208

209

I have advocated usage of web feeds<sup>2</sup> on several previous opinion documents. Actually there are two standards for web feeds: RSS<sup>3 4</sup> and Atom<sup>5 6 7</sup>.

212

213

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

214

215

216

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

217

218

219

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

220

221

222

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

223

224

225

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

226

227

228

It can be noted, that different back-office systems (with a wide variety of different technologies) can implement RSS standards, and these RSS feeds can be used in the front-office systems. With this kind solutions front-office systems don't need direct system-to-system communications with back-office systems.

229

230

231

2 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed)

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

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

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

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

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

232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276

### ANNEX 1

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

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

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

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_1](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century

[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](http://www.jukkarannila.fi/lausunnot.html#nro_2)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_3](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](http://www.jukkarannila.fi/lausunnot.html#nro_5)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_6](http://www.jukkarannila.fi/lausunnot.html#nro_6)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_8](http://www.jukkarannila.fi/lausunnot.html#nro_8)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_9](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 15: Collective Redress

[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](http://www.jukkarannila.fi/lausunnot.html#nro_15)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_17](http://www.jukkarannila.fi/lausunnot.html#nro_17)

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_18](http://www.jukkarannila.fi/lausunnot.html#nro_18)

- 277 EN: Opinion 19: Official Acknowledgement by the Commission  
278 [http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)  
279
- 280 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
281 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
282
- 283 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
284 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
285
- 286 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
287 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
288
- 289 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
290 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
291
- 292 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
293 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
294
- 295 EN: Opinion 30: Internet Filtering  
296 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
297 NOTE: Organised by the European Committee for Standardization (CEN) <sup>8</sup>  
298
- 299 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
300 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
301
- 302 EN: Opinion 34: REMIT Registration Format  
303 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
304 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>9</sup>  
305
- 306 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
307 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
308
- 309 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
310 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
311
- 312 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
313 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
314
- 315 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
316 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
317
- 318 EN: Opinion 41: AT.39398: observations on the proposed commitments  
319 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)

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

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



- 320  
321 EN: Opinion 42: Opening up Education  
322 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)  
323  
324 EN: Opinion 43: Publication of extracts of the European register of market participants  
325 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
326 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
327  
328 EN: Opinion 44: Evaluation policy guidelines  
329 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
330  
331 EN: Opinion 45: About ICT standardisation  
332 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
333  
334 EN: Opinion 46: Review of the EU copyright rules  
335 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
336  
337 EN: Opinion 51: European Area of Skills and Qualifications  
338 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
339  
340 EN: Opinion 52: Trusted Cloud Europe Survey  
341 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
342  
343 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
344 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
345 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
346  
347 EN: Opinion 55: European Energy Regulation  
348 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
349 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
350  
351 EN: Opinion 59: Green paper on mobile Health  
352 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
353  
354 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
355 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
356  
357 EN: Opinion 61: European Register of Products Containing Nanomaterials  
358 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
359  
360 EN: Opinion 64: Corporate Social Responsibility - European Commission  
361 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
362  
363 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
364 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)

- 365 EN: Opinion 68: European Network Code Stakeholder Committees  
366 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
367 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
368
- 369 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
370 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
371 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
372
- 373 EN: Opinion 74: Enabling the Internet of Things  
374 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
375 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) <sup>10</sup>  
376
- 377 EN: Opinion 80: Mandatory Transparency Register  
378 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
379
- 380 EN: Opinion 84: Revision of the European Interoperability Framework  
381 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
382
- 383 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
384 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
385
- 386 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
387 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
388
- 389 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
390 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
391 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
392
- 393 EN: Opinion 93: Safety of apps and other non-embedded software  
394 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
395
- 396 EN: Opinion 95: Targeted consultation on eForms  
397 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
398
- 399 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
400 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
401
- 402 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
403 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
404
- 405 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
406 Regulators. Recast  
407 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)  
408

<sup>10</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 409 EN: Opinion 100: Protection of personal data (EU)  
410 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
411
- 412 EN: Opinion 101: Governance of the Energy Union  
413 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)  
414
- 415 EN: Opinion 102: Smart Wearables  
416 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)  
417
- 418 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
419 (ENISA)  
420 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)  
421
- 422 EN: Opinion 108: Single Digital Gateway  
423 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)  
424
- 425 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code  
426 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)  
427
- 428 EN: Opinion 111: Interoperability of information systems for migration and security  
429 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)  
430
- 431 EN: Opinion 113: Transform of health and care  
432 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)  
433
- 434 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the  
435 Internet  
436 [http://www.jukkarannila.fi/lausunnot.html#nro\\_114](http://www.jukkarannila.fi/lausunnot.html#nro_114)  
437 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
438
- 439 EN: Opinion 118: Fake news and online disinformation  
440 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)  
441
- 442 EN: Opinion 119: European Social Security Number  
443 [http://www.jukkarannila.fi/lausunnot.html#nro\\_119](http://www.jukkarannila.fi/lausunnot.html#nro_119)  
444
- 445 EN: Opinion 120: European Labour Authority  
446 [http://www.jukkarannila.fi/lausunnot.html#nro\\_120](http://www.jukkarannila.fi/lausunnot.html#nro_120)  
447
- 448 EN: Opinion 121: 2nd Data Package  
449 [http://www.jukkarannila.fi/lausunnot.html#nro\\_121](http://www.jukkarannila.fi/lausunnot.html#nro_121)  
450
- 451 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European  
452 Cybersecurity Research and Competence Centre  
453 [http://www.jukkarannila.fi/lausunnot.html#nro\\_122](http://www.jukkarannila.fi/lausunnot.html#nro_122)

- 454  
455 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF  
456 THE COUNCIL on the re-use of public sector information (recast)  
457 [http://www.jukkarannila.fi/lausunnot.html#nro\\_123](http://www.jukkarannila.fi/lausunnot.html#nro_123)  
458  
459 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents  
460 [http://www.jukkarannila.fi/lausunnot.html#nro\\_125](http://www.jukkarannila.fi/lausunnot.html#nro_125)  
461  
462 EN: Opinion 128: Summertime arrangements  
463 [http://www.jukkarannila.fi/lausunnot.html#nro\\_128](http://www.jukkarannila.fi/lausunnot.html#nro_128)  
464  
465 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange  
466 [http://www.jukkarannila.fi/lausunnot.html#nro\\_129](http://www.jukkarannila.fi/lausunnot.html#nro_129)  
467  
468 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data  
469 [http://www.jukkarannila.fi/lausunnot.html#nro\\_132](http://www.jukkarannila.fi/lausunnot.html#nro_132)  
470  
471 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement  
472 ("eForms")  
473 [http://www.jukkarannila.fi/lausunnot.html#nro\\_133](http://www.jukkarannila.fi/lausunnot.html#nro_133)  
474  
475 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by  
476 UCC  
477 [http://www.jukkarannila.fi/lausunnot.html#nro\\_134](http://www.jukkarannila.fi/lausunnot.html#nro_134)  
478  
479 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)  
480 [http://www.jukkarannila.fi/lausunnot.html#nro\\_139](http://www.jukkarannila.fi/lausunnot.html#nro_139)  
481  
482 EN: Opinion 141: Farm Accountancy Data Network  
483 [http://www.jukkarannila.fi/lausunnot.html#nro\\_141](http://www.jukkarannila.fi/lausunnot.html#nro_141)  
484  
485 EN: Opinion 142: Horizon Europe (two consultations)  
486 [http://www.jukkarannila.fi/lausunnot.html#nro\\_142](http://www.jukkarannila.fi/lausunnot.html#nro_142)  
487  
488 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation  
489 (evaluation)  
490 [http://www.jukkarannila.fi/lausunnot.html#nro\\_144](http://www.jukkarannila.fi/lausunnot.html#nro_144)  
491  
492 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative  
493 [http://www.jukkarannila.fi/lausunnot.html#nro\\_146](http://www.jukkarannila.fi/lausunnot.html#nro_146)  
494 NOTE: Organised by the European Committee for Standardization (CEN)  
495  
496 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems  
497 [http://www.jukkarannila.fi/lausunnot.html#nro\\_147](http://www.jukkarannila.fi/lausunnot.html#nro_147)  
498

- 499 EN: Opinion 152: Revision of the Non-Financial Reporting Directive  
500 [http://www.jukkarannila.fi/lausunnot.html#nro\\_152](http://www.jukkarannila.fi/lausunnot.html#nro_152)  
501
- 502 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation  
503 [http://www.jukkarannila.fi/lausunnot.html#nro\\_154](http://www.jukkarannila.fi/lausunnot.html#nro_154)  
504
- 505 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year  
506 2021  
507 [http://www.jukkarannila.fi/lausunnot.html#nro\\_156](http://www.jukkarannila.fi/lausunnot.html#nro_156)  
508
- 509 EN: Opinion 159: EU competition law - market definition notice (evaluation)  
510 [http://www.jukkarannila.fi/lausunnot.html#nro\\_159](http://www.jukkarannila.fi/lausunnot.html#nro_159)  
511
- 512 EN: Opinion 161: New Competition Tool ('NCT')  
513 [http://www.jukkarannila.fi/lausunnot.html#nro\\_161](http://www.jukkarannila.fi/lausunnot.html#nro_161)  
514
- 515 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online  
516 platforms acting as gatekeepers  
517 [http://www.jukkarannila.fi/lausunnot.html#nro\\_162](http://www.jukkarannila.fi/lausunnot.html#nro_162)  
518
- 519 EN: Opinion 165: Legislative framework for the governance of common European data spaces  
520 [http://www.jukkarannila.fi/lausunnot.html#nro\\_165](http://www.jukkarannila.fi/lausunnot.html#nro_165)  
521
- 522 EN: Opinion 166: Sharing information between national business registers  
523 [http://www.jukkarannila.fi/lausunnot.html#nro\\_166](http://www.jukkarannila.fi/lausunnot.html#nro_166)  
524
- 525 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework  
526 evaluation & strategy  
527 [http://www.jukkarannila.fi/lausunnot.html#nro\\_167](http://www.jukkarannila.fi/lausunnot.html#nro_167)  
528
- 529 EN: Opinion 169: Fighting child sexual abuse: detection, removal and reporting of illegal content  
530 online  
531 [http://www.jukkarannila.fi/lausunnot.html#nro\\_169](http://www.jukkarannila.fi/lausunnot.html#nro_169)  
532  
533  
534  
535
- 536 My opinions to the previous and relevant consultations – there consultations were mostly organised  
537 by the European Commission. General page to all consultations – both in English and in Finnish:  
538 <http://www.jukkarannila.fi/lausunnot.html>  
539  
540  
541 [Continues on the next page]

542

543

544 DISCLAIMERS

545

546 Legal disclaimer:

547 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am  
548 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

549 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the  
550 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective  
551 actor making those actions.

552

553 Political disclaimer:

554 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and  
555 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal  
556 entity making law proposals.

557

558 These opinions are not meant to be extreme-right, moderate-right, extreme-centre, moderate-centre, extreme-left or  
559 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of  
560 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or  
561 worldwide politics.

562

563 These opinions are not meant to rally for a candidacy in any public election at any level.

564

565 Content of web pages:

566 This text may or may not refer to web pages. The content of those web pages is not responsibility of author of this  
567 document. They are referenced on the date of this document. If referenced web pages are not found after the date when  
568 this document is dated, that situation is not responsibility of the author. All changes done in the web pages this  
569 document refers are sole responsibility of those organisations and individuals maintaining those web pages. All illegal  
570 content found on the referred web pages is not on the responsibility of the author of this document, and producing that  
571 kind content is not endorsed by the author of this document.

572

573 Use of broken English

574 This text is in English, but from a person, whose is not a native English-speaking person. Therefore the text may or may  
575 not contain bad, odd and broken English, and can contain awkward linguistic solutions.

576

577 COPYRIGHT

578

579 This opinion paper is distributed under Creative Commons licence, to be specific the licence is "Attribution-  
580 NonCommercial-NoDerivatives 4.0 International (CC BY-NC-ND 4.0)". The text of the licence can be obtained from  
581 the following web page:

582 <http://creativecommons.org/licenses/by-nc-nd/4.0/>

583 The English explanation is on the following web page:

584 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

585



586

587

588 Tämän lausunnon lisenssi on Creative Commons -lisenssi, tarkemmin ottaen Nimeä-EiKaupallinen-EiMuutoksia 4.0  
589 Kansainvälinen (CC BY-NC-ND 4.0). Lisenssin tekstit saa luettua seuraavilla www-sivuilla:

590

591 <https://creativecommons.org/licenses/by-nc-nd/4.0/deed.fi>

592 <https://creativecommons.org/licenses/by-nc-nd/4.0/legalcode.fi>