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TO:  
Directorate-General for Communications Networks, Content and Technology (DG CNET)  
European Commission

**Consultation / Fake news and online disinformation / CNECT PLAN/2017/1783**  
**Ref. Ares(2017)5489364 - 10/11/2017**

First of all, a lot of thanks to Directorate-General for Communications Networks, Content and Technology (DG CNET) 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 on the European Union level.  
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila  
citizen of Finland  
signed electronically

[Continues on the next page]

41  
42 **Two previous consultations highlighted**

43  
44 Here we can note two previous consultations – meaning opinions 40 and 86.

45  
46 EN: Opinion 40: Media Freedom and Pluralism / Audiovisual Regulatory Bodies  
47 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)

48  
49 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
50 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)

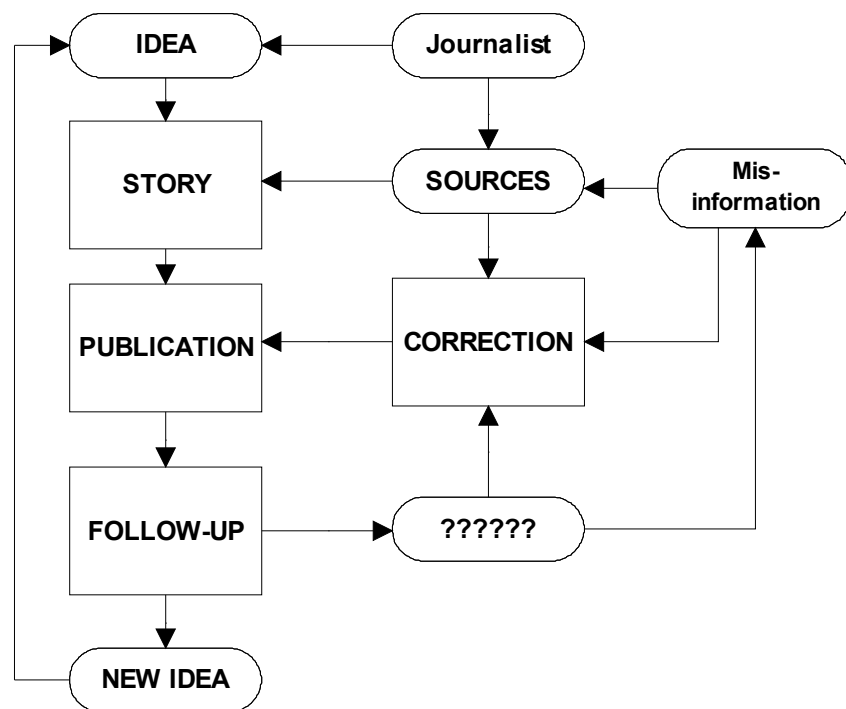
51  
52 **Repetition of some issues**

53  
54 Parts of previous opinions can be highlighted again based on current consultation (fake news and  
55 online disinformation). Naturally there will some new issues mentioned related to this consultation.

56  
57 **One simplification**

58  
59 Based on previous opinions I have constructed following figure.

60



61  
62  
63 One clear problem is misinformation. Also correcting different misinformed claims should be  
64 handled efficiently. Problem of misinformation is accelerated since electronic networks can spread  
65 misinformation very efficiently.

66

67 **The general aim: pursuit for the truth / truth-seeking**

68

69 The truth is, that misinformation can spread nowadays instantly around the Internet. Therefore, the  
70 truth-seeking endeavours are facing yet another problem, i.e. distortion by the general  
71 misinformation.

72

73 There are some interesting examples of truth-seeking endeavours organised outside the European  
74 Union:

75 \* PolitiFact <sup>1</sup>

76 \* PolitiFact Australia <sup>2</sup>

77 \* FactCheck.org <sup>3</sup>

78 \* The Fact Checker <sup>4</sup>.

79

80 It can be said, that PolitiFact has a reputational brand, and the brand is now expanded to Australia.  
81 All these four examples are organised differently. (e.g. a foundation, a private company). Also, there  
82 are some (non-profit) institutions supporting investigative journalism. Naturally, there are different  
83 sites for leaking different classified material to the public, e.g. <sup>5</sup> Wikileaks.

84

85 The aim is the same with different organising modes: serious truth-seeking.

86

87 In this opinion, I will not give a qualitative analysis for the examples; the general note is, that some  
88 of those services can be very controversial depending on the situation.

89

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

91

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

96

97 \* global identifiers (ID)

98 \* EU-wide identifiers (ID)

99 \* general member state identifiers (ID)

100 \* several identifiers (ID) in member states.

101

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

103

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

106

107 Examples of these identifiers are following:

1 <http://www.politifact.com/about/>, About PolitiFact

2 <http://www.politifact.com.au/>, PolitiFact Australia

3 <http://www.factcheck.org/>, FactCheck.org

4 <http://www.washingtonpost.com/blogs/fact-checker/>, The Fact Checker / Washington Post

5 <http://wikileaks.org/About.html>, About WikiLeaks

- 108  
109 1) Facebook ID for an individual person  
110 2) Facebook ID for the individual up-dates of individuals  
111 3) Data Universal Numbering System (D-U-N-S)  
112 4) Reuters instruments codes (RICs)  
113 5) Social security code for individual citizens in the European Union member states  
114 6) Business identity code for a company in an European Union member state  
115 7) Value added tax code for a company in an European Union member state.

116  
117 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),  
118 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand  
119 of using IDs from privately owned information systems.

120  
121 **Examples of identifiers (ID) based on scientific communication**

122  
123 Here we can mention following identifiers:

- 124  
125 DOI <sup>6</sup>  
126 ORCID <sup>7</sup>  
127 ResearcherID <sup>8</sup>  
128 Scopus Author ID <sup>9</sup>  
129 ISNI <sup>10</sup>

130  
131 DOI is identifier (ID) for scientific articles. ORCID, ResearcherID and Scopus Author ID are  
132 identifiers (ID) for scientists. ISNI is identifier (ID) for contributors to creative works generally.

133  
134 What we can learn from these identifiers (DOI, ORCID, ResearcherID, Scopus Author ID, ISNI)?

135  
136 Here we can note following issues:

- 137  
138 1) specific (scientific) articles can be pinpointed clearly  
139 2) different scientist can be pinpointed clearly  
140 3) there can be non-profit organisations for developing different identifiers  
141 4) there can be commercial organisations for developing different identifiers.  
142 5) there can be different identifiers for the same issue, e.g. global and national  
143 6) there can be some redundancy of different identifiers.

144  
145 Here we can note one Finnish example:

- 146  
147 1) **Juuli** portal of the research publications produced at Finnish organizations <sup>11</sup>

6 <http://www.doi.org>

7 <https://orcid.org>

8 <http://www.researcherid.com>

9 <https://www.scopus.com/freelookup/form/author.uri>

10 <http://www.isni.org>

11 <http://www.juuli.fi>

148

149 Naturally different countries can have their own research publications databases, which collect  
150 information about research publications of a specific country.

151

### 152 **Proposal for identifiers (ID) for media solutions**

153

154 Based on the previous ideas of identifiers (ID) there could be following issues when creating  
155 different identifiers (ID) for media solutions:

156

- 157 • identifiers (ID) for media organisations (e.g. newspaper or television channel)
- 158 • identifiers (ID) for journalists
- 159 • identifiers (ID) for stories provided by media organisations
- 160 • identifiers (ID) for corrections of different stories.

161

162 **Proposal: A serious assessment of different identifiers (ID) for media solutions could be**  
163 **done on the European Union level.**

164

165 Naturally following identifiers (ID) could be assessed:

166

- 167 • **global identifiers (ID)**
- 168 • **EU-wide identifiers (ID)**
- 169 • **general member state (EU) identifiers (ID)**
- 170 • **several identifiers (ID) in members states (EU).**

171

172 Based on examples of identifiers (ID) of scientific publications there could be similar efforts.

173

### 174 **National level?**

175

176 It can be concluded, that a specific story in the national in a member state is actually distributed in  
177 several systems in a member state. Different member state systems (MSS) are then integrated in  
178 different layers. In other words, the original is distributed totally and partially to several systems.

179

180 Like said before, one (or more) of the systems can be a special system for correcting the  
181 misinformation distributed in different stories.

182

183 In the national level (member state) there is is a need at least for the following information:

184

- 185 • clear identifier for an original story
- 186 • original story without modifications
- 187 • modification(s) added later to the original story
- 188 • originator(s) of a story
- 189 • factual references of a story
- 190 • original distributor of a story
- 191 • members (persons / communities) in a story
- 192 • references to previous story / stories

193

194 On the other hand, the misinformation can spread also, and there could be the following  
195 information:

196

197

198

199

200

201

202

203

204

205

- clear identifier for the found misinformation
- original (misinformation) story without modifications
- modification(s) added later to the original (misinformation) story
- originator(s) of a (misinformation) story
- factual references of a (misinformation) story
- non-factual references of a (misinformation) story
- original distributor of a (misinformation) story
- members (persons / communities) in a (misinformation)story.

206 Naturally, there has to be identifier for person / community, who / which has made a evaluation of a  
207 story and the amount of misinformation in a story. Therefore some more additions:

208

209

210

211

- person / community responsible for evaluating the amount of misinformation  
in a story.

212 It can be said, that depending on the situation in a specific member state, misinformation  
213 distributing efforts are covered rather fast. E.g. in Finland different media actors are quite eager to  
214 point mistakes in stories provided by other media actors.

215

### 216 **Why there is so much text about a simple issue?**

217

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

220

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

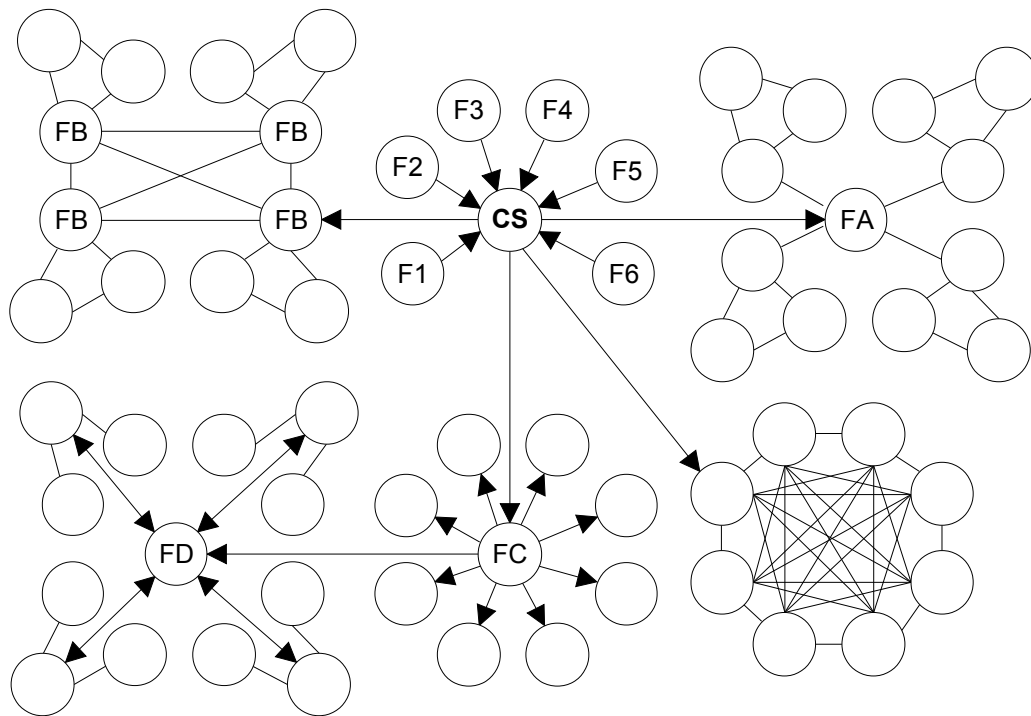
227

### 228 **Problem of layered information systems**

229

230 [Continues on the next page]

231



232  
233

234 Naturally there can be a central system (CS) on some occasions. A central system (CS) could handle  
235 the problem of several identifiers (ID) on different levels. In reality there can be several layers for  
236 different systems. Then there can be several formats (e.g. F1-F6, FA-FD) which can be based on  
237 standardisation efforts.

238

239 **Proposal: A serious assessment of layered information systems could be done on the**  
240 **European Union level.**

241

242 **EU-wide level?**

243

244 However, the news cycle (factual and non-factual) does not follow neatly or easily the national  
245 borders between member states. A story revealed is global by nature in our globalised world.

246

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

250

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

255

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

256

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

257

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

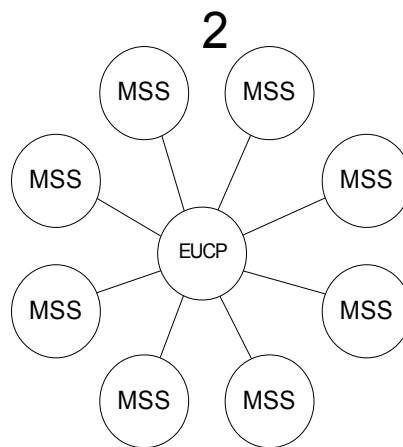
258

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

264

265 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude  
 266 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).  
 267

267



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

268

269

270

271

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

275

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

279

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

282

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

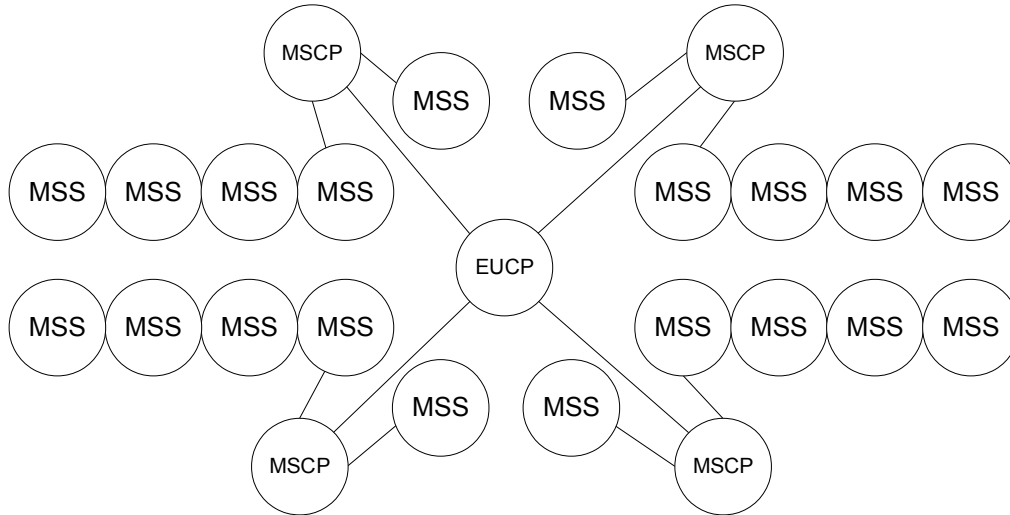
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287 [Continues on the next page]



3



**MSS = Member State System**

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

288

289

290

291

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

295

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

298

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

304

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

307

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

310

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

313

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

317

318 **Possible global connections**

319

320 Here we can note that there can be global contact point for different issues.

321

322 **Proposal: There could be assessments about global contact points for different issues.**

323

324 **Proposal: There could be assessments about cooperation between global contact**  
325 **point(s) and European contact point(s).**

326

327 In reality there are several information systems related to global security issues. Consolidating with  
328 different global systems means some practical efforts on the European Union level.

329

330 **About different standards**

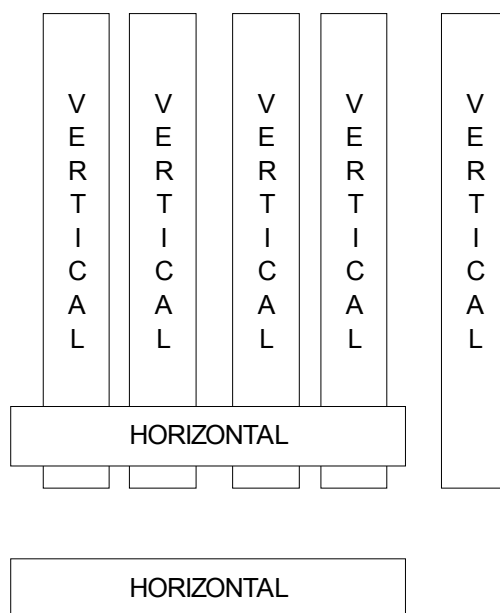
331

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

334

335 **Favouring open standards / Favouring horizontal standards**

336



337

338

339 There are differences between horizontal and vertical standards. A simple example is naturally  
340 email solutions. There are several vertical standards when creating technically email solutions. Then  
341 there are horizontal standards which enable sending messages between technically different email  
342 solutions.

343

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

345

346

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

347

348

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

351

352

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

353

354

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

355

356

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

357

358

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

361

Here we can note some problems:

363

364

- some systems are based on **de-facto** standards
- some systems are based on **de-jure** standards
- there can be confrontations between **de-facto** and **de-jure** standards
- there can be a monopoly situation in some domain
- some standards may inhibit possible actions of some stakeholders
- there can be a standard war on some domains
- standards have different life-cycles
- systems have different life-cycles
- there can be mismatches between different life-cycles
- there can be failed standards
- there can be deprecated standards.

365

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375

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

380

381

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388

**What could be done on the European Union level?**

389

390 The main issues addressed in this opinion are:

391

- 392 1) The challenge of real-time misinformation
- 393 2) Mitigating the real-time misinformation with different IDs for (inter alia)
- 394 stories, actor, factual information, misinformation
- 395 3) The problem of layered IDs nationally, EU-wide and globally
- 396 4) Some solutions for layered IDs.

397

398 It can be said, that there will be several formats / standards, which can be free and public, 2) private  
399 and commercial, 3) not standardised, 4) standardised, 5) national, 6) international, 7) official, 8)  
400 non-official, 9) obsolete. And naturally there are several combinations (1 to 9).

401

**Proposal: Therefore European Commission could do following:**

402

- 403 1) **Follow the standards / formats landscape in the media landscape**
- 404 2) **Encourage usage of public and free standards in the media landscape**
- 405 3) **Possible fund and advise the development of public and free standards in**
- 406 **the media landscape**
- 407 4) **Assess the situation with private and commercial identifiers (ID) in the**
- 408 **media landscape**
- 409 5) **Possibly enforce some opening the usage of interfaces private and**
- 410 **commercial identifiers (ID) in the media landscape (cf. RICs case)**
- 411 6) **Active cooperation with global partners which provide different IDs in**
- 412 **the media landscape.**

413

**An example of possible activity for the European Commission**

414

415 Previously, there was is a simple conception of a journalistic publication: from an idea to another  
416 idea, and in the middle there is the publication of a story. In the following figure, there is simple  
417 process model from beginning to ending.

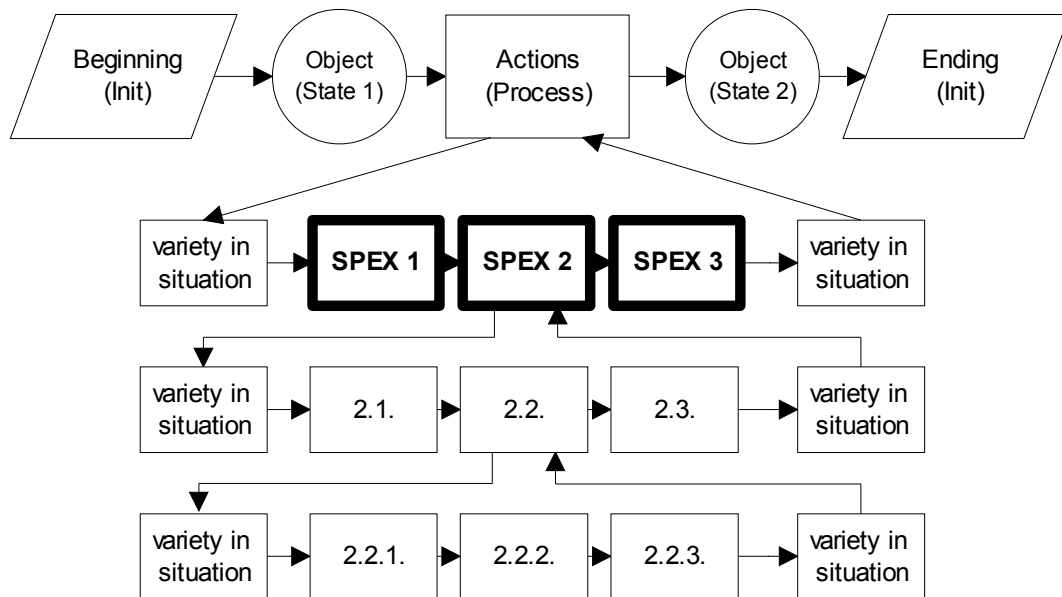
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420 [Continues on the next page]

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422



423  
424

425 Generally speaking, information systems need in some points highly detailed information, and in  
426 some cases this information is given by people using displays.

427

428 The European Commission could work with global and regional partners for creating standardised  
429 user interfaces (SPEX) for different stakeholders. These standardised user interfaces (SPEX) could  
430 then be implemented by different information systems.

431

432 An example for this kind of standardised user interfaces (SPEX) could be “a citizen interface” for  
433 reporting inaccuracies in a published story, i.e. the “a citizen interface” for reporting inaccuracies in  
434 story would be the same or almost the same in different systems regardless of the technological  
435 measures. These standardised user interfaces (SPEX) could be developed in different consultations.

436

437 **An example of possible activity for the European Commission**

438

439 Since the European Union is a multi-lingual community, the question of language is important.

440

441 The European Commission could work with global and regional partners for publishing linguistic  
442 versions of some important texts in different information systems. Generally speaking, just English  
443 versions of texts in some information systems might not be feasible. The developers of some  
444 information systems could be very interested to have linguistic versions for their information  
445 services, but they don't have resources to do that.

446

447 One option is, that the European Commission funds the translation work of some important  
448 information systems, and then collects the funded amount of money is collected gradually back, e.g.  
449 yearly basis. Naturally, there has to be serious assessment of this approach, but in some cases an  
450 important information systems can be developed with minimal resources, even though the usage of

451 that system can be global.

452

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

454



455

456

457 I have advocated usage of web feeds<sup>12</sup> on several previous opinion documents. Actually there are  
458 two standards for web feeds: RSS<sup>13 14</sup> and Atom<sup>15 16 17</sup>.

459

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

462

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

465

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

469

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

471

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

474

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

479

480 **More technical consultations?**

481

482 Based on answers (consultation generally) there could be more technically oriented consultations.  
483 Previously mentioned issues (this opinion) could be detailed for new technically oriented  
484 consultations.

485

486 **Proposal: More technically oriented consultations could be organised after this**  
487 **consultation.**

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

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

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

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

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

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

488

**489 From the consultation document / Funding development of different information systems**

490

491 The consultation document mentions following issues:

492

493 In particular, the planned multi-stakeholders dialogue should enable the identification of  
494 enhanced flagging and content verification systems to ensure a prompt identification of fake  
495 news online, including through advanced automatic tools; advanced methods for tracking  
496 dissemination patterns of fake news online, removal of fake news originators and  
497 disseminators, including impostor websites and social bots; mechanisms to facilitate the  
498 exposure of relevant alternative news sources (e.g. traditional media) on users' social feeds;  
499 and requirements for more transparency and accountability in the use of algorithms that rank  
500 or organise the presentation of online news content.

501

502 All these issues can be supported. However actually implementing different proposals means using  
503 some money for implementation of different systems.

504

**505 Question: Who could support financially development implementation of proposed  
506 systems (mentioned on the consultation document)?**

507

508 Like mentioned there could be one European contact point (EUCP) for cooperation between  
509 different systems. The problem is naturally funding European contact point (EUCP).

510

**511 Question: Who could support financially development implementation of  
512 proposed European contact point (EUCP)?**

513

**514 Question: Who could support financially development of global contact  
515 point(s)?**

516

517 I have proposed several times creation of non-profit foundation for handling different technological  
518 issues.

519

**520 Proposal: Could there be a non-profit foundation which could develop different  
521 technical solutions for handling fake news?**

522

523 We already have the <sup>18</sup> International Fact-Checking Network (IFCN) which is organised by <sup>19</sup> the  
524 Poynter Institute. Cooperation with International Fact-Checking Network could be assessed  
525 carefully.

526

**527 Question: Is there already a non-profit organisation(s) for handling fake news?**

528

**529 Proposal: Cooperation with current non-profit organisation(s) could be assessed  
530 carefully.**

18 <https://www.poynter.org/channels/fact-checking>, International Fact-Checking Network

19 <https://www.poynter.org/>, Poynter Institute

531

532 I have concluded that creation of a non-profit foundation is a good solution since all stakeholders  
533 can be equal. A non-profit foundation guarantees good operation without commercial interests.  
534 Naturally different commercial entities can be members of a non-profit foundation.

535

536 **From the consultation document / No legislative efforts?**

537

538 The extensive stakeholder consultation process described below will help the Commission to  
539 assess the effectiveness of actions undertaken so far by market players and other  
540 stakeholders and to identify where existing activities need to be scaled up or where new  
541 actions need to be undertaken in order to address different types of fake news. The  
542 Communication aims to offer a set of principles addressed to all the stakeholders concerned,  
543 for **implementation through self-regulation** by social media platforms in cooperation with  
544 news providers and civil society.

545

546 **Question: Who could fund development of some (new) systems?**

547

548 Like mentioned before funding of different (new?) system(s) may be a problem.

549

550 **Proposal: Effectiveness of self-regulation should be assessed carefully.**

551

552 **Proposal: Based on assessment of effectiveness of self-regulation there could be some**  
553 **proposals for further self-regulation for different stakeholders.**

554

555 **Opinion: Naturally we can organise different issues without legislative texts.**

556

557

558 **Good luck!!!**

559

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

562

563

564 [Continues on the next page]

565



566

**ANNEX 1**

567

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

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

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

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