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TO: Directorate-General for Migration and Home Affairs / Unit B3

Document identifier: Ref. Ares(2017)3765711 - 26/07/2017

Interoperability of information systems for migration and security

First of all, a lot of thanks to Directorate-General for Migration and Home Affairs for organising this important consultation.

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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]

40

41 **A list of previous consultations**

42

43 On Annex 1 is information about my previous consultations based on different consultations. Many
 44 opinions have been addressed to different units of the European Commission. I have repeated the
 45 same issues several times on those documents (Opinions).

46

47 **Several issues have been implemented or proposed before this opinion**

48

49 I have highlighted several issues based previous consultations. Many of my proposals are already
 50 implemented as legislative text. Many of my proposals are already in different information systems.

51

52 Therefore this opinion is rather limited and this opinion highlights just some issues.

53

54 **About documents**

55

56 I have tried to read following documents

57

* COM(2016) 205 final – Brussels, 6.4.2016

58

* High-level expert group on information systems and interoperability – Final report
 (May 2017)

59

* Universal Message Format – brochure

60

61 **Large number of different information systems / Understanding context**

62

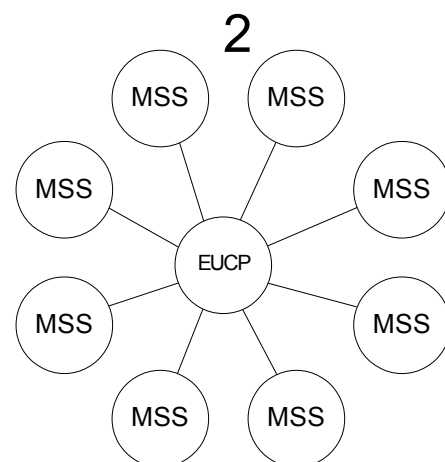
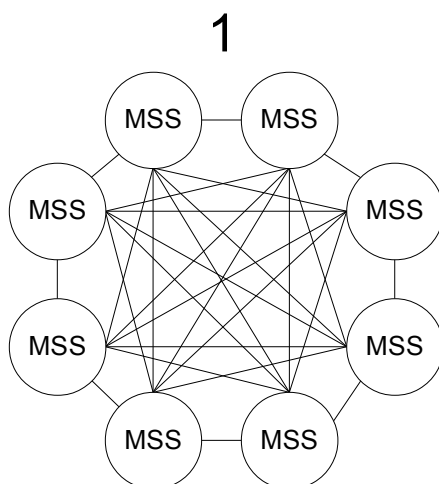
63 Different information systems referenced in different documents. Actually there are so many
 64 information systems referenced that it is rather hard to understand meaning of all mentioned
 65 information systems.

66

67 **About member state systems (MSS) and European Contact point (EUCP)**

68

69



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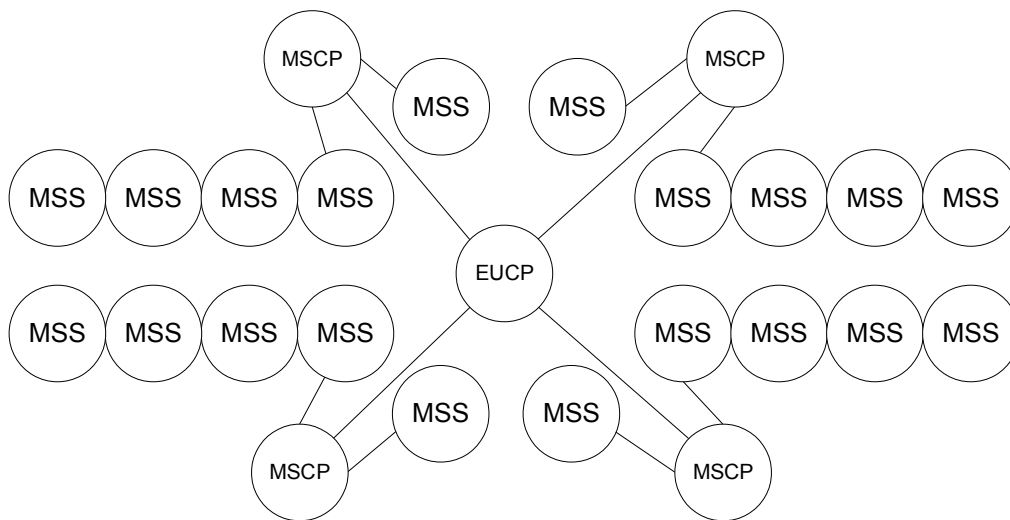
71

72 Based on previous consultations I have presented importance of member state systems (MSS) and
 73 European Contact point (EUCP).

74
 75 I have noted several times that different member state systems (MSS) can interlinked in many ways.
 76 This means that co-operation with European Union systems means a lot of work.

77

3



78

79

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

82

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

88

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

91

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

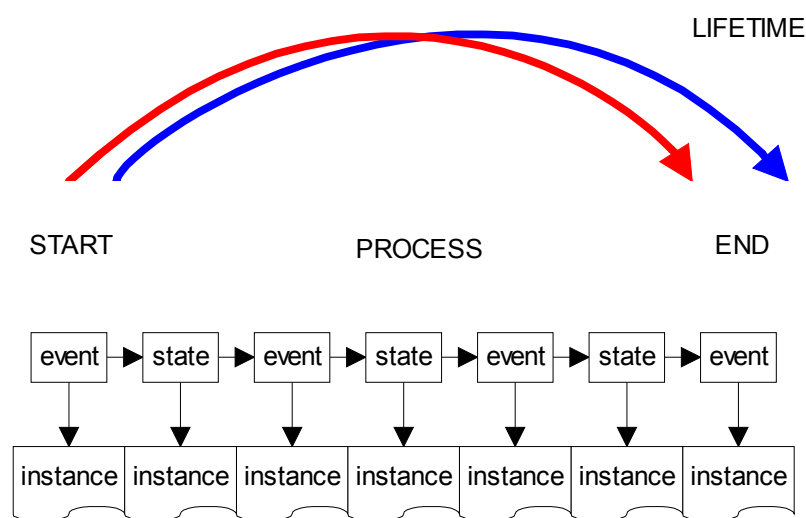
94

95 Universal Message Format as a standard has been developed previously and this can help with
 96 consolidation efforts.

97

98 **Processes, events, states, lifetime, instances, start and end**

99



100
101

102 Finally some important concepts can be noted: processes, events, states, lifetime, instances start and
103 end. It can be noted that during the lifetime of an information system there can be significant changes
104 with the selected and implemented standards.

105

106 **Proposal: Based on the results of this consultation European Commission could create
107 a roadmap/timeline for implementing different interoperable system.**

108

109 **Proposal: Based on the results of this consultation could create roadmap/timeline for
110 consolidating different interoperable system**

111

112 Therefore European Commission could have a clear roadmap for implementing different standards
113 in the near and distant future.

114

115 Here we note that different information systems have different lifetimes based on several issues.
116 Therefore there could be a clear roadmap for different information systems based on lifetime.

117

118 **More and more new identifiers (ID)**

119

120 In previous consultations there has been discussion about different identifiers (ID) in different
121 information systems. It can be noted from the previous opinions that there will be several and
122 different identifiers (ID) for different levels.

123

124 **Proposal: There could be a systematic review of different identifiers (ID) on different
125 levels.**

126

127 **Proposal: Possible systematic review of different identifiers (ID) should assess different
128 situations.**

129

130 Different information systems have also internal identifiers (ID) and external identifiers (ID) for

131 (possible) public usage. The added value for different stakeholders is provided by combination of
 132 different identifiers (ID) in a specific information system.

133

134 **Proposal: There could be some assessment(s) based on different versions of different**
 135 **identifiers (ID).**

136

137 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
 138 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
 139 (ID), but this consolidation means some serious technical and administrative actions.

140

141 **Proposal: Legacy identifiers (ID) could be assessed seriously.**

142

143 **Added value of different identifiers (ID)?**

144

145 Here we can note possible cooperation between different systems and usually cooperation between
 146 different systems means using different identifiers (ID). There can be some central (S1 ↔ S2)
 147 systems which collect information from other systems which have own identifiers (ID).

148

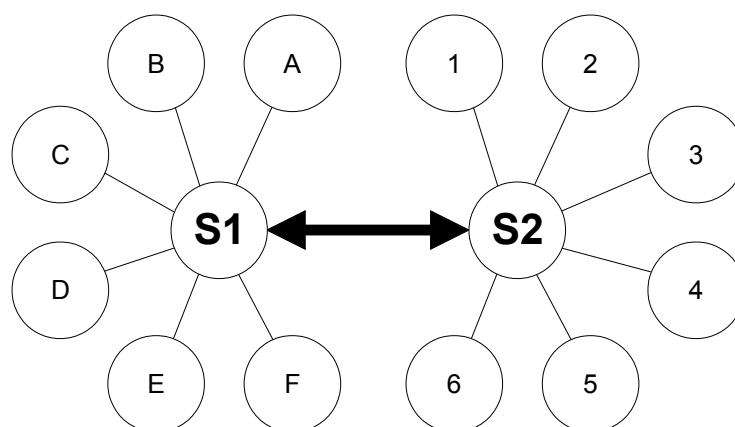
149 In previous consultations there has been discussion about different identifiers (ID) in different
 150 information systems. It can be noted from the previous opinions that there will be several and
 151 different identifiers (ID) for different levels. On the European Union level there can be several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

153

- 154 • global identifiers (ID)
- 155 • EU-wide identifiers (ID)
- 156 • general member state identifiers (ID)
- 157 • several identifiers (ID) in member states.

158

1-2



159

160

161 **Note: Digitalisation of everything means more identifiers (ID).**

162

163

Note: All new identifiers (ID) mean more work for developing existing and new informations systems.

164

165

166

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

167

168

169

Note: There can be new stakeholder groups in the near/distant future which mean more identifiers (ID).

170

171

172

173

Good luck!!!

174

175

176

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

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[Continues on the next page]

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ANNEX 1

184

185 My opinions to the previous and relevant consultations – there consultations were mostly organised
186 by the European Commission. General page to all consultations – both in English and in Finnish:
187 <http://www.jukkarannila.fi/lausunnot.html>

188

189

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

192

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

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

195

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

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

198

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

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

202

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

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

205

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

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

208

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

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

211

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

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

215

216 EN: Opinion 15: Collective Redress

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

218

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

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

221

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

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

224

225 EN: Opinion 19: Official Acknowledgement by the Commission

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

227

- 228 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
229 http://www.jukkarannila.fi/lausunnot.html#nro_20
230
- 231 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
232 http://www.jukkarannila.fi/lausunnot.html#nro_21
233
- 234 EN: Opinion 23: Public consultation on the review of the European Standardisation System
235 http://www.jukkarannila.fi/lausunnot.html#nro_23
236
- 237 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
238 http://www.jukkarannila.fi/lausunnot.html#nro_27
239
- 240 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
241 http://www.jukkarannila.fi/lausunnot.html#nro_28
242
- 243 EN: Opinion 30: Internet Filtering
244 http://www.jukkarannila.fi/lausunnot.html#nro_30
245 NOTE: Organised by the European Committee for Standardization (CEN) ¹
246
- 247 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
248 http://www.jukkarannila.fi/lausunnot.html#nro_32
249
- 250 EN: Opinion 34: REMIT Registration Format
251 http://www.jukkarannila.fi/lausunnot.html#nro_34
252 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
253
- 254 EN: Opinion 35: Exploiting the employment potential of the personal and household services
255 http://www.jukkarannila.fi/lausunnot.html#nro_35
256
- 257 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
258 http://www.jukkarannila.fi/lausunnot.html#nro_37
259
- 260 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
261 http://www.jukkarannila.fi/lausunnot.html#nro_39
262
- 263 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
264 http://www.jukkarannila.fi/lausunnot.html#nro_40
265
- 266 EN: Opinion 41: AT.39398: observations on the proposed commitments
267 http://www.jukkarannila.fi/lausunnot.html#nro_41
268
- 269 EN: Opinion 42: Opening up Education
270 http://www.jukkarannila.fi/lausunnot.html#nro_42

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

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

- 271
272 EN: Opinion 43: Publication of extracts of the European register of market participants
273 http://www.jukkarannila.fi/lausunnot.html#nro_43
274 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
275
276 EN: Opinion 44: Evaluation policy guidelines
277 http://www.jukkarannila.fi/lausunnot.html#nro_44
278
279 EN: Opinion 45: About ICT standardisation
280 http://www.jukkarannila.fi/lausunnot.html#nro_45
281
282 EN: Opinion 46: Review of the EU copyright rules
283 http://www.jukkarannila.fi/lausunnot.html#nro_46
284
285 EN: Opinion 51: European Area of Skills and Qualifications
286 http://www.jukkarannila.fi/lausunnot.html#nro_51
287
288 EN: Opinion 52: Trusted Cloud Europe Survey
289 http://www.jukkarannila.fi/lausunnot.html#nro_52
290
291 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
292 http://www.jukkarannila.fi/lausunnot.html#nro_53
293 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
294
295 EN: Opinion 55: European Energy Regulation
296 http://www.jukkarannila.fi/lausunnot.html#nro_55
297 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
298
299 EN: Opinion 59: Green paper on mobile Health
300 http://www.jukkarannila.fi/lausunnot.html#nro_59
301
302 EN: Opinion 60: Cross-border inheritance tax problems within the EU
303 http://www.jukkarannila.fi/lausunnot.html#nro_60
304
305 EN: Opinion 61: European Register of Products Containing Nanomaterials
306 http://www.jukkarannila.fi/lausunnot.html#nro_61
307
308 EN: Opinion 64: Corporate Social Responsibility - European Commission
309 http://www.jukkarannila.fi/lausunnot.html#nro_64
310
311 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
312 http://www.jukkarannila.fi/lausunnot.html#nro_66
313
314
315

- 316 EN: Opinion 68: European Network Code Stakeholder Committees
317 http://www.jukkarannila.fi/lausunnot.html#nro_68
318 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
319
- 320 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
321 http://www.jukkarannila.fi/lausunnot.html#nro_71
322 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
323
- 324 EN: Opinion 74: Enabling the Internet of Things
325 http://www.jukkarannila.fi/lausunnot.html#nro_74
326 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ³
327
- 328 EN: Opinion 80: Mandatory Transparency Register
329 http://www.jukkarannila.fi/lausunnot.html#nro_80
330
- 331 EN: Opinion 84: Revision of the European Interoperability Framework
332 http://www.jukkarannila.fi/lausunnot.html#nro_84
333
- 334 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
335 http://www.jukkarannila.fi/lausunnot.html#nro_86
336
- 337 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
338 http://www.jukkarannila.fi/lausunnot.html#nro_88
339
- 340 EN: Opinion 89: BEREC Guidelines for net neutrality rules
341 http://www.jukkarannila.fi/lausunnot.html#nro_89
342 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
343
- 344 EN: Opinion 93: Safety of apps and other non-embedded software
345 http://www.jukkarannila.fi/lausunnot.html#nro_93
346
- 347 EN: Opinion 95: Targeted consultation on eForms
348 http://www.jukkarannila.fi/lausunnot.html#nro_95
349
- 350 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
351 http://www.jukkarannila.fi/lausunnot.html#nro_97
352
- 353 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
354 http://www.jukkarannila.fi/lausunnot.html#nro_98
355
- 356 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
357 Regulators. Recast
358 http://www.jukkarannila.fi/lausunnot.html#nro_99
359

³ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

360

361 EN: Opinion 100: Protection of personal data (EU)

362 http://www.jukkarannila.fi/lausunnot.html#nro_100

363

364 EN: Opinion 101: Governance of the Energy Union

365 http://www.jukkarannila.fi/lausunnot.html#nro_101

366

367 EN: Opinion 102: Smart Wearables

368 http://www.jukkarannila.fi/lausunnot.html#nro_102

369

370 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
371 (ENISA)372 http://www.jukkarannila.fi/lausunnot.html#nro_106

373

374 EN: Opinion 108: Single Digital Gateway

375 http://www.jukkarannila.fi/lausunnot.html#nro_108

376

377 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code

378 http://www.jukkarannila.fi/lausunnot.html#nro_110

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382 My opinions to the previous and relevant consultations – there consultations were mostly organised
383 by the European Commission. General page to all consultations – both in English and in Finnish:384 <http://www.jukkarannila.fi/lausunnot.html>

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387 [Continues on the next page]

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ANNEX 2

390 DISCLAIMERS

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