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TO:
European Commission

Commission reference: Ref. Ares(2019)4941562 – 29/07/2019

Draft for COMMISSION IMPLEMENTING REGULATION (EU) – amending Implementing Regulation (EU) 2015/220 laying down rules for the application of Council Regulation (EC) No 1217/2009 setting up a network for the collection of accountancy data on the incomes and business operation of agricultural holdings in the European Union

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 disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

44

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

46

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

50

51 **Collecting accountancy data only once**

52

53 Generally speaking information should be added only once for some central system.

54

55 **Proposal: ALL data should be added only once in some (central information) system.**

56

57 The same information can be asked several time which means more work for reporting different
58 issues.

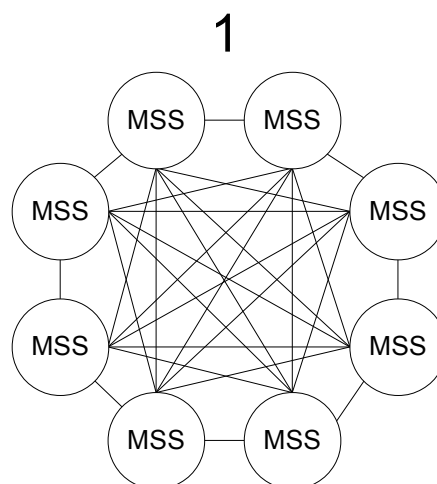
59

60 **EU-wide level?**

61

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

65



MSS = Member State System

66

67

68

69 There are 28 member states (European Union) at the moment. In reality there are unique situations
70 with information systems in different member states. In some cases information systems can be
71 implemented based on complex system-to-system connections. Complex system-to-system
72 connections means a lot of work when there are changes in some systems.

73

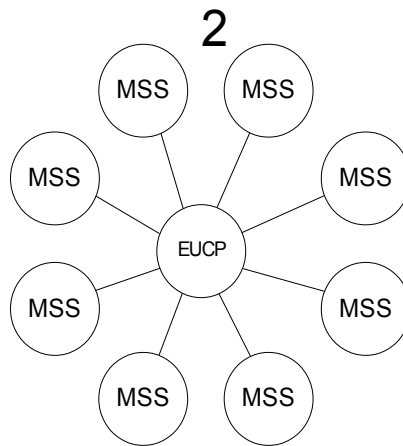
74 Naturally there could be direct contacts between different member state systems (MSS) and
75 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large

76 number of different member state system. Based on 28 member state systems there could be
 77 hundreds of connections:

78
 79 $28 \times 10 = 280 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$
 80 $28 \times 20 = 560 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$
 81 $28 \times 30 = 840 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$
 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 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 90 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
 91



92
 93 **MSS = Member State System, EUCP = European Contact Point**
 94

95 In the current situation, European Union member states (and some co-operation states) have their
 96 own internal IDs for several information systems. Also, the members states organised as a
 97 federation have their own internal problems with state-level IDs.
 98

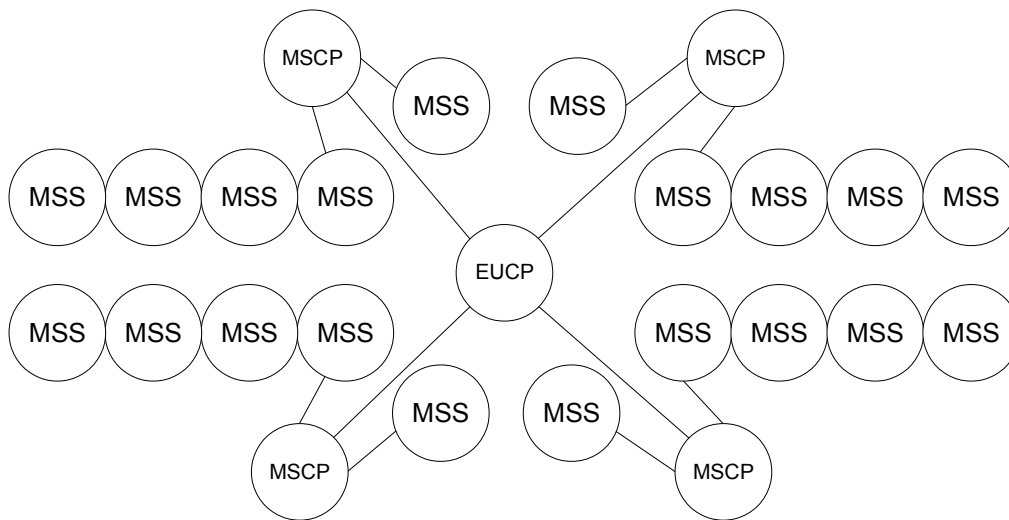
99 Based on those calculations there could be a lot of direct connections to the European contact point.
 100 Number of those connections can be overwhelming. The situation between member states can vary
 101 in many ways. So there can different and unique systems between member states.
 102

103 On the other hand, there are some working examples of joined or federated EU-wide registers.
 104 However, the amount of administration and needed legally binding agreements is considerable.
 105

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

108
 109
 110 [Continues on the next page]

3



MSS = Member State System

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

111
 112
 113
 114
 115 The solution can be, that member states have own Member State Contact Points (MSCP) and
 116 different state level systems are combined gradually. Then the member state system IDs can be used
 117 in the European Contact Point (EUCP).

118
 119 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 120 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

121
 122 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 123 there can be member state contact points (MCP). Then there can be some hierarchy between
 124 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 125 with member state systems in member states. Therefore member state contact points (MCP) can
 126 reduce the complexity with European Union contact point (EUCP).

127
 128 **Proposal: Different member state systems could be consolidated based on limited**
 129 **number system-to-system connections.**

130
 131 **Proposal: There could be some time frames for consolidating different member state**
 132 **systems (MSS) with member state contact points (MSCP).**

133
 134 **Proposal: There could be some time frames for consolidating member state contact**
 135 **points (MSCP) with the European Union contact point (EUCP).**

136

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

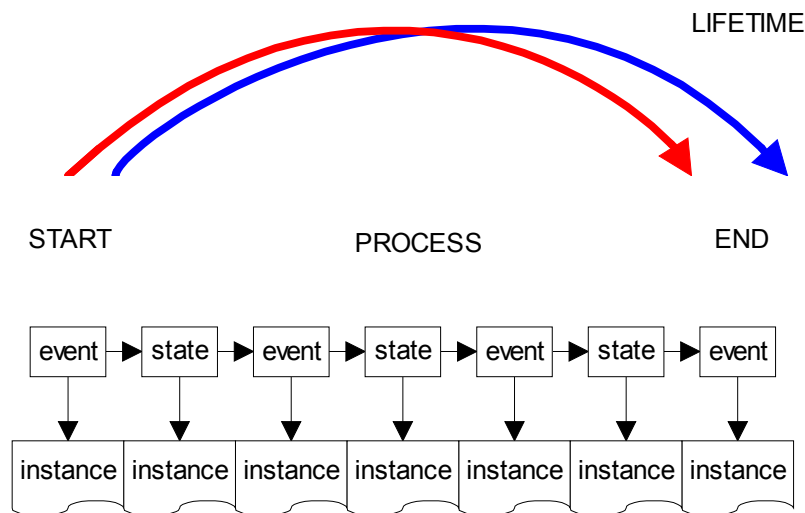
141 **Proposal: There could be some serious work for developing a standardised member**
 142 **state contact point (MSCP).**

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

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

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

157 **Consolidation based on system lifetime**



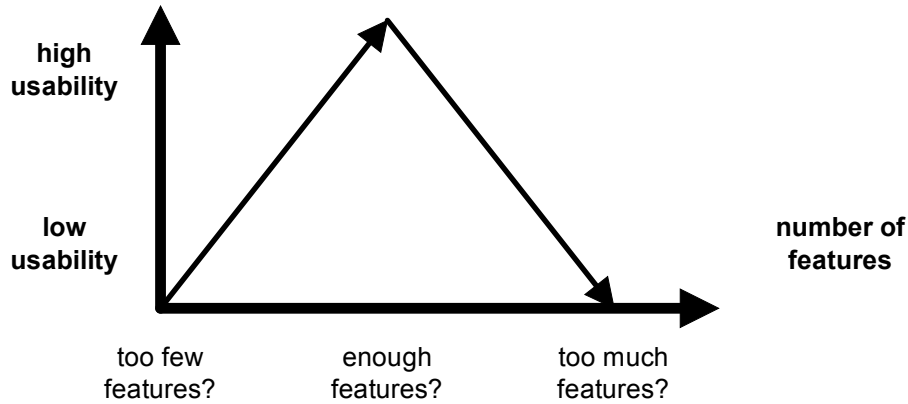
159 Here can be noted that every system have some lifetime. During lifetime there can be several
 160 processes which mean documenting events and states.
 161
 162

164 **Proposal: One issue for consolidation of information systems is lifetime of systems.**

166 **Proposal: Lifetime of different systems could be assessed carefully.**

167

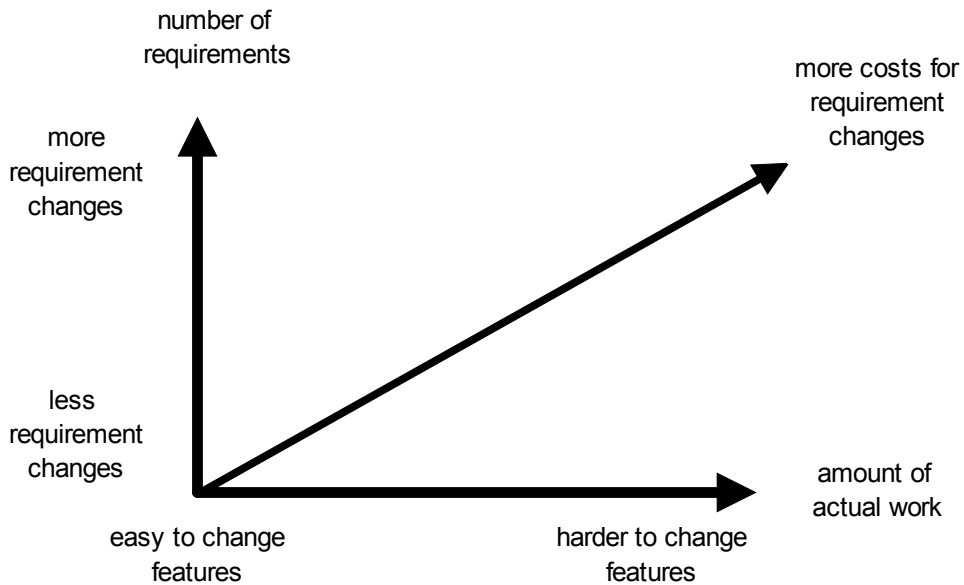
168 **Features and requirements in different information systems**
169



170
171
172 One issue is assessment of different features.

173
174 **Proposal: Number of different information system features could assessed carefully.**

175
176 **Proposal: There should not be too much features in information systems.**
177



178
179
180 One issue is number of different requirements. There can be too many requirement changes which
181 mean more work for system developers.

182

Proposal: Number of requirements could be assessed carefully.

183

184

185

Proposal: All new requirements should be assessed very carefully before implementing different requirements in different information systems.

186

187

Possible technical consultations

188

189

Proposal: There could be more technical consultations based on results of this consultation.

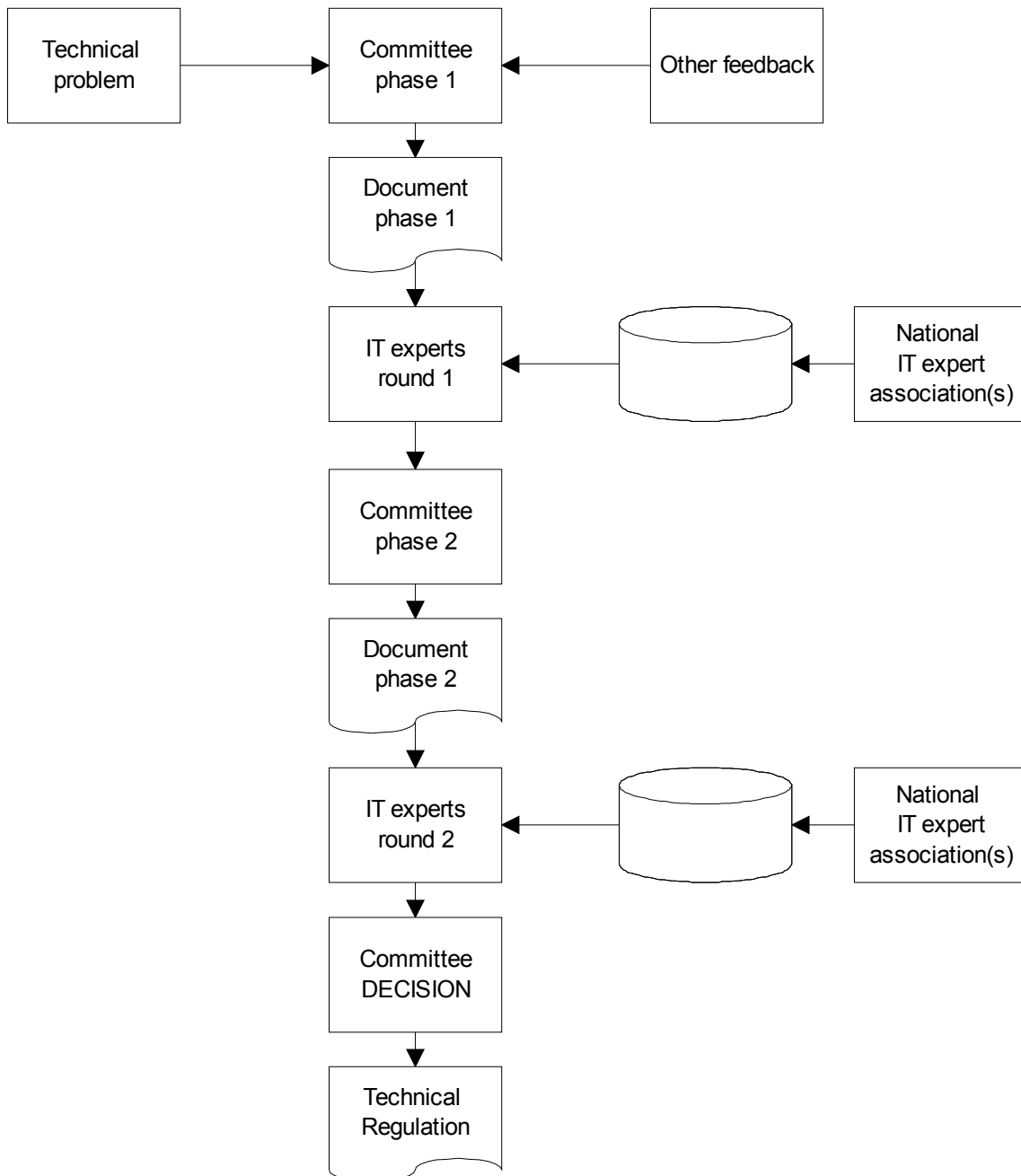
190

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194 [Continues on the next page]



195
196

197 An example of more technical consultation could be assessment of different XML formats. One
198 option is distributing information about technical consultations to different information technology
199 expert associations. Naturally there can be different phases (e.g. two phases) for assessing different
200 information technology issues.

201
202
203

Proposal: Information about more technical consultations could be distributed for different information technology expert associations.

204

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

206



207

208

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

211

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

214

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

217

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

221

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

223

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

226

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

231

232

233 **Good luck!!!**

234

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

237

238 [Continues on the next page]

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

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

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

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

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

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

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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

EN: Opinion 2: Schools for the 21st Century

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

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

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

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

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

EN: Opinion 15: Collective Redress

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

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

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

- 284 EN: Opinion 19: Official Acknowledgement by the Commission
285 http://www.jukkarannila.fi/lausunnot.html#nro_19
286
- 287 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
288 http://www.jukkarannila.fi/lausunnot.html#nro_20
289
- 290 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
291 http://www.jukkarannila.fi/lausunnot.html#nro_21
292
- 293 EN: Opinion 23: Public consultation on the review of the European Standardisation System
294 http://www.jukkarannila.fi/lausunnot.html#nro_23
295
- 296 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
297 http://www.jukkarannila.fi/lausunnot.html#nro_27
298
- 299 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
300 http://www.jukkarannila.fi/lausunnot.html#nro_28
301
- 302 EN: Opinion 30: Internet Filtering
303 http://www.jukkarannila.fi/lausunnot.html#nro_30
304 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
305
- 306 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
307 http://www.jukkarannila.fi/lausunnot.html#nro_32
308
- 309 EN: Opinion 34: REMIT Registration Format
310 http://www.jukkarannila.fi/lausunnot.html#nro_34
311 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
312
- 313 EN: Opinion 35: Exploiting the employment potential of the personal and household services
314 http://www.jukkarannila.fi/lausunnot.html#nro_35
315
- 316 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
317 http://www.jukkarannila.fi/lausunnot.html#nro_37
318
- 319 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
320 http://www.jukkarannila.fi/lausunnot.html#nro_39
321
- 322 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
323 http://www.jukkarannila.fi/lausunnot.html#nro_40
324
- 325 EN: Opinion 41: AT.39398: observations on the proposed commitments
326 http://www.jukkarannila.fi/lausunnot.html#nro_41

⁷ <http://www.cen.eu/> (Accessed 2 July 2012)

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

- 327
328 EN: Opinion 42: Opening up Education
329 http://www.jukkarannila.fi/lausunnot.html#nro_42
330
331 EN: Opinion 43: Publication of extracts of the European register of market participants
332 http://www.jukkarannila.fi/lausunnot.html#nro_43
333 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
334
335 EN: Opinion 44: Evaluation policy guidelines
336 http://www.jukkarannila.fi/lausunnot.html#nro_44
337
338 EN: Opinion 45: About ICT standardisation
339 http://www.jukkarannila.fi/lausunnot.html#nro_45
340
341 EN: Opinion 46: Review of the EU copyright rules
342 http://www.jukkarannila.fi/lausunnot.html#nro_46
343
344 EN: Opinion 51: European Area of Skills and Qualifications
345 http://www.jukkarannila.fi/lausunnot.html#nro_51
346
347 EN: Opinion 52: Trusted Cloud Europe Survey
348 http://www.jukkarannila.fi/lausunnot.html#nro_52
349
350 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
351 http://www.jukkarannila.fi/lausunnot.html#nro_53
352 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
353
354 EN: Opinion 55: European Energy Regulation
355 http://www.jukkarannila.fi/lausunnot.html#nro_55
356 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
357
358 EN: Opinion 59: Green paper on mobile Health
359 http://www.jukkarannila.fi/lausunnot.html#nro_59
360
361 EN: Opinion 60: Cross-border inheritance tax problems within the EU
362 http://www.jukkarannila.fi/lausunnot.html#nro_60
363
364 EN: Opinion 61: European Register of Products Containing Nanomaterials
365 http://www.jukkarannila.fi/lausunnot.html#nro_61
366
367 EN: Opinion 64: Corporate Social Responsibility - European Commission
368 http://www.jukkarannila.fi/lausunnot.html#nro_64
369
370 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
371 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 372
373 EN: Opinion 68: European Network Code Stakeholder Committees
374 http://www.jukkarannila.fi/lausunnot.html#nro_68
375 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
376
377 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
378 http://www.jukkarannila.fi/lausunnot.html#nro_71
379 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
380
381 EN: Opinion 74: Enabling the Internet of Things
382 http://www.jukkarannila.fi/lausunnot.html#nro_74
383 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁹
384
385 EN: Opinion 80: Mandatory Transparency Register
386 http://www.jukkarannila.fi/lausunnot.html#nro_80
387
388 EN: Opinion 84: Revision of the European Interoperability Framework
389 http://www.jukkarannila.fi/lausunnot.html#nro_84
390
391 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
392 http://www.jukkarannila.fi/lausunnot.html#nro_86
393
394 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
395 http://www.jukkarannila.fi/lausunnot.html#nro_88
396
397 EN: Opinion 89: BEREC Guidelines for net neutrality rules
398 http://www.jukkarannila.fi/lausunnot.html#nro_89
399 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
400
401 EN: Opinion 93: Safety of apps and other non-embedded software
402 http://www.jukkarannila.fi/lausunnot.html#nro_93
403
404 EN: Opinion 95: Targeted consultation on eForms
405 http://www.jukkarannila.fi/lausunnot.html#nro_95
406
407 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
408 http://www.jukkarannila.fi/lausunnot.html#nro_97
409
410 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
411 http://www.jukkarannila.fi/lausunnot.html#nro_98
412
413 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
414 Regulators. Recast
415 http://www.jukkarannila.fi/lausunnot.html#nro_99

⁹ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 416
417 EN: Opinion 100: Protection of personal data (EU)
418 http://www.jukkarannila.fi/lausunnot.html#nro_100
419
420 EN: Opinion 101: Governance of the Energy Union
421 http://www.jukkarannila.fi/lausunnot.html#nro_101
422
423 EN: Opinion 102: Smart Wearables
424 http://www.jukkarannila.fi/lausunnot.html#nro_102
425
426 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
427 (ENISA)
428 http://www.jukkarannila.fi/lausunnot.html#nro_106
429
430 EN: Opinion 108: Single Digital Gateway
431 http://www.jukkarannila.fi/lausunnot.html#nro_108
432
433 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
434 http://www.jukkarannila.fi/lausunnot.html#nro_110
435
436 EN: Opinion 111: Interoperability of information systems for migration and security
437 http://www.jukkarannila.fi/lausunnot.html#nro_111
438
439 EN: Opinion 113: Transform of health and care
440 http://www.jukkarannila.fi/lausunnot.html#nro_113
441
442 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
443 Internet
444 http://www.jukkarannila.fi/lausunnot.html#nro_114
445 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
446
447 EN: Opinion 118: Fake news and online disinformation
448 http://www.jukkarannila.fi/lausunnot.html#nro_118
449
450 EN: Opinion 119: European Social Security Number
451 http://www.jukkarannila.fi/lausunnot.html#nro_119
452
453 EN: Opinion 120: European Labour Authority
454 http://www.jukkarannila.fi/lausunnot.html#nro_120
455
456 EN: Opinion 121: 2nd Data Package
457 http://www.jukkarannila.fi/lausunnot.html#nro_121
458
459
460

- 461 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
462 Cybersecurity Research and Competence Centre
463 http://www.jukkarannila.fi/lausunnot.html#nro_122
464
- 465 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
466 THE COUNCIL on the re-use of public sector information (recast)
467 http://www.jukkarannila.fi/lausunnot.html#nro_123
468
- 469 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
470 http://www.jukkarannila.fi/lausunnot.html#nro_125
471
- 472 EN: Opinion 128: Summertime arrangements
473 http://www.jukkarannila.fi/lausunnot.html#nro_128
474
- 475 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
476 http://www.jukkarannila.fi/lausunnot.html#nro_129
477
- 478 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
479 http://www.jukkarannila.fi/lausunnot.html#nro_132
480
- 481 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
482 ("eForms")
483 http://www.jukkarannila.fi/lausunnot.html#nro_133
484
- 485 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
486 UCC
487 http://www.jukkarannila.fi/lausunnot.html#nro_134
488
- 489
- 490 My opinions to the previous and relevant consultations – there consultations were mostly organised
491 by the European Commission. General page to all consultations – both in English and in Finnish:
492 <http://www.jukkarannila.fi/lausunnot.html>
493
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