Jukka S. Rannila

www.jukkarannila.fi

OPINION

16 August 2021

1 (20)

Public / WWW

1
2 TO:
3 Unit A.3: Company law
4 Directorate-General for Justice and Consumers (JUST)
5 European Commission
6
7
8 **Ref. Ares(2021)4683211 - 20/07/2021**
9 **Upgrading digital company law**
10
11
12 First of all, a lot of thanks to Directorate-General for Justice and Consumers (JUST) for organising
13 this important consultation.
14
15 This opinion represents an opinion of an individual citizen, not any legal entity.
16
17 This opinion does not contain:
18   –   any business secrets
19   –   any trade secrets
20   –   any confidential information.
21
22 This opinion is public.
23 PDF file of this opinion can be added to a relevant web page.
24
25 Annex 1 holds information about previous consultations at the European Union level.
26 Annex 2 holds information about copyright, licence and disclaimers.
27
28
29
30 Best Regards,
31
32
33
34 Jukka S. Rannila
35 citizen of Finland
36
37 signed electronically
38
39
40 [Continues on the next page]

41
42 **About previous consultations / Repeating several issues**
43
44 Annex 1 holds information about previous consultations. I have repeated the same issues several
45 times and previous consultation documents can be assessed critically. Different units of the
46 European Commission already know something about my previous opinions.
47
48 **Highlighting only some issues**
49
50 This opinion does not handle all issues which are mentioned on the consultation document. I have
51 presented different issues to different units of the European Commission. Generally speaking many
52 proposals are already implemented and therefore I don't present all possible issues based on this
53 consultation.
54
55 **The consultation document is technologically neutral and does not mention specific company**
56 **names**
57
58 It is fully understandable that the consultation document is technologically neutral. It is also fully
59 understandable that the consultation document does not mention specific company names.
60
61 **This opinion concentrates on Business Registers Interconnection System (BRIS)**
62
63 Business Registers Interconnection System (BRIS) is the main issue for this opinion.
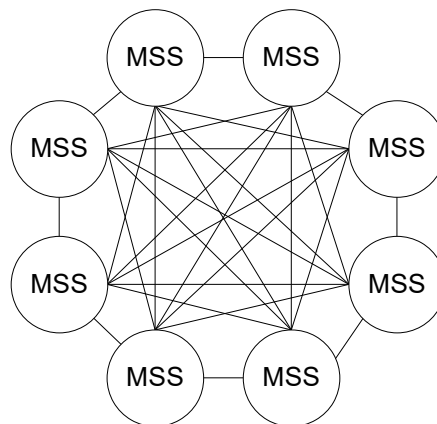64
65 **EU-wide level?**
66
67 I have noted several times that different member state systems (MSS) can interlinked in many ways.
68 This means that co-operation with European Union systems means a lot of work. This leads to the
69 question of a European Contact Point (EUCP) for different member state systems (MSS).
70

MSS = Member State System

71
72

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73
74   There are 28 member states (European Union) at the moment. In reality there are unique situations
75   with information systems in different member states. In some cases information systems can be
76   implemented based on complex system-to-system connections. Complex system-to-system
77   connections means a lot of work when there are changes in some systems.
78
79   Naturally there could be direct contacts between different member state systems (MSS) and
80   European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
81   number of different member state system. Based on 27 member state systems there could be
82   hundreds of connections:
83
84   27 x 10 = 270 MSS ↔ 1 EUCP
85   27 x 20 = 540 MSS ↔ 1 EUCP
86   27 x 30 = 810 MSS ↔ 1 EUCP
87
88   Here we can note that there can be hierarchy between different system (EU ↔ member states) and
89   there can be member state contact points (MCP). Then there can be some hierarchy between
90   different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
91   with member state systems in member states. Therefore member state contact points (MCP) can
92   reduce the complexity with European Union contact point (EUCP)
93
94   Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
95   that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
96
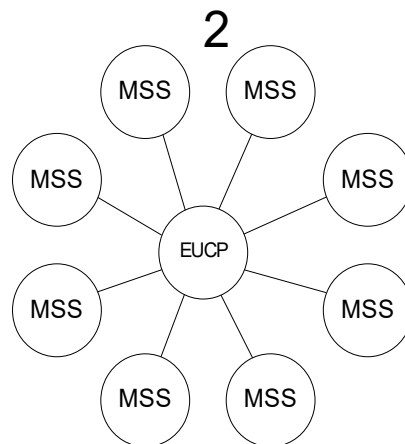
97
98   **MSS = Member State System, EUCP = European Contact Point**
99
100 In the current situation, European Union member states (and some co-operation states) have their
101 own internal IDs for several information systems. Also, the members states organised as a
102 federation have their own internal problems with state-level IDs.
103
104 Based on those calculations there could be a lot of direct connections to the European contact point.

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105 Number of those connections can be overwhelming. The situation between member states can vary
106 in many ways. So there can different and unique systems between member states.
107
108 On the other hand, there are some working examples of joined or federated EU-wide registers.
109 However, the amount of administration and needed legally binding agreements is considerable.
110
111 **Proposal : There could be one information system (member state contact point, MSCP)**
112 **on member state level.**
113
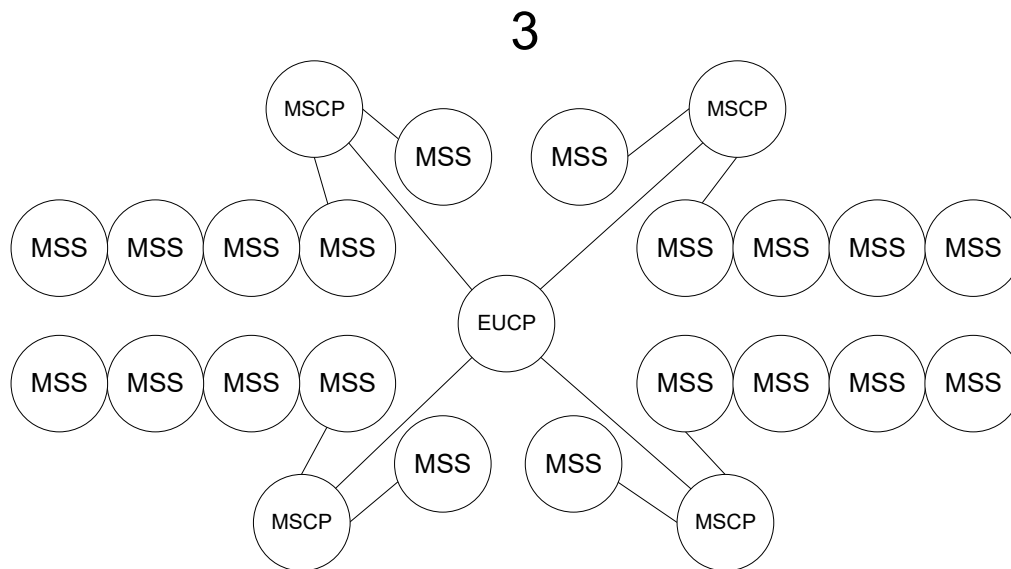
MSS = Member State System
MSCP = Member State Contact Point, EUCP = European Contact Point

114
115
116
117
118 The solution can be, that member states have own Member State Contact Points (MSCP) and
119 different state level systems are combined gradually. Then the member state system IDs can be used
120 in the European Contact Point (EUCP).
121
122 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
123 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
124
125 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
126 there can be member state contact points (MCP). Then there can be some hierarchy between
127 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
128 with member state systems in member states. Therefore member state contact points (MCP) can
129 reduce the complexity with European Union contact point (EUCP).
130
131 **Proposal: Different member state systems could be consolidated based on limited**
132 **number system-to-system connections.**
133

134   **Proposal: There could be some time frames for consolidating different member state**
135   **systems (MSS) with member state contact points (MSCP).**
136
137   **Proposal: There could be some time frames for consolidating member state contact**
138   **points (MSCP) with the European Union contact point (EUCP).**
139
140   **Proposal: One information system (member state contact point, MSCP) on member**
141   **state level could handle system-to-system connections with the European Union level**
142   **(European contact point).**
143
144   **Proposal: There could be some serious work for developing a standardised member**
145   **state contact point (MSCP).**
146
147   **Proposal: After developing a standardised member state contact point (MSCP)**
148   **different member states could consolidate their systems (MSS ↔ MSCP).**
149
150   **Proposal: European Union contact point (EUCP) and member state contact points**
151   **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
152   **Union level.**
153
154 Naturally we have to note that developing a standardised member state contact point (MSCP) means
155 more work. On the other hand a standardised member state contact point (MSCP) could handle
156 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
157 states may have more systems than other member states. We have to note that there are different
158 systems based on several technological solutions.
159
160 **About different identifiers (ID)**
161
162 Developing a standardised member state contact point (MSCP) means some work to be done. Here
163 we can note that there will be several _**identifiers**_ when developing new systems and maintaining
164 current systems (EUCP ↔ MSCP).
165
166 I have proposed several times to use _**open and public identifiers**_ when developing different
167 information system.
168
169 **More and more new identifiers (ID)**
170
171 In previous consultations there has been discussion about different identifiers (ID) in different
172 information systems. It can be noted from the previous opinions that there will be several and
173 different identifiers (ID) for different levels.
174
175 Examples of these identifiers (ID) are following:
176
177   1) Facebook ID for an individual person
178   2) Facebook ID for the individual up-dates of individuals

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179   3) Data Universal Numbering System (D-U-N-S)
180   4) Reuters instruments codes (RICs)
181   5) Social security code for individual citizens in the European Union member states
182   6) Business identity code for a company in an European Union member state
183   7) Value added tax code for a company in an European Union member state.
184
185 The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S),
186 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
187 of using identifiers (ID) from privately owned information systems.
188
189   **Proposal: There could be a systematic review of different identifiers (ID) on different**
190   **levels.**
191
192   **Proposal: Possible systematic review of different identifiers (ID) should assess different**
193   **situations.**
194
195 Different information systems have also internal identifiers (ID) and external identifiers (ID) for
196 (possible) public usage. The added value for different stakeholders is provided by combination of
197 different identifiers (ID) in a specific information system.
198
199   **Proposal: The could be some assessment(s) based on different versions of different**
200   **identifiers (ID).**
201
202 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
203 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
204 (ID), but this consolidation means some serious technical and administrative actions.
205
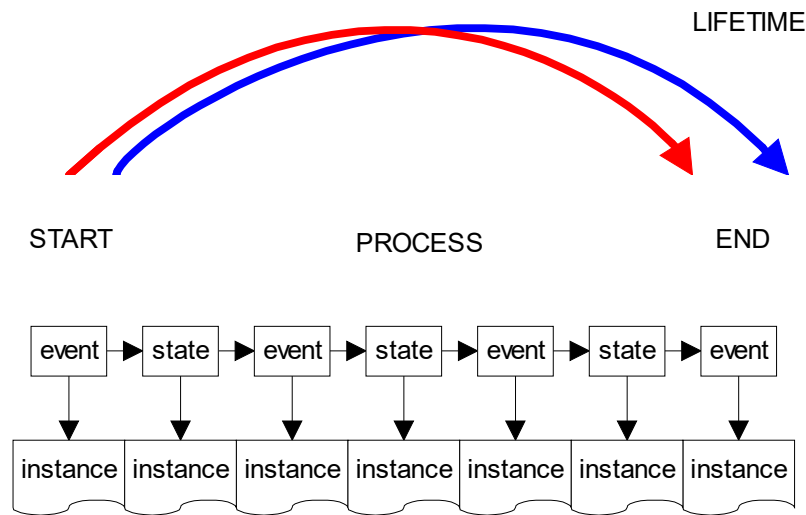206   **Proposal: Legacy identifiers (ID) could be assessed seriously.**
207
208 When information about relevant identifiers is collected, there could be a serious assessment of
209 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
210 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.
211
212   **Proposal: The nature of different identifiers (ID) could be assessed.**
213
214   **Proposal: There could be serious negotiations with some providers of identifiers (ID).**
215
216 In the European Union there has been different anti-trust cases which are related to different private
217 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
218 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.
219
220 **Processes, events, states, lifetime, instances, start and end**
221

LIFETIME

START   PROCESS   END

| event | → | state | → | event | → | state | → | event | → | state | → | event |

| instance | instance | instance | instance | instance | instance | instance |

222
223
224 Finally some important concepts can noted: processes, events, states, lifetime, instances start and
225 end. It can noted that during the lifetime of an information system there can be significant changes
226 with the selected and implemented standards.
227
228 **Proposal: Based on the results of this consultation European Commission could create**
229 **a roadmap/timeline for implementing different interoperable system.**
230
231 **Proposal: Based on the results of this consultation could create roadmap/timeline for**
232 **consolidating different interoperable system**
233
234 Therefore European Commission could have a clear roadmap for implementing different standards
235 in the near and distant future.
236
237 Here we note that different information system have different lifetime based on several issues.
238 Therefore there could be clear roadmap for different information systems based on lifetime.
239
240 **Assessing different application programming interface (APIS) / System timeline**
241
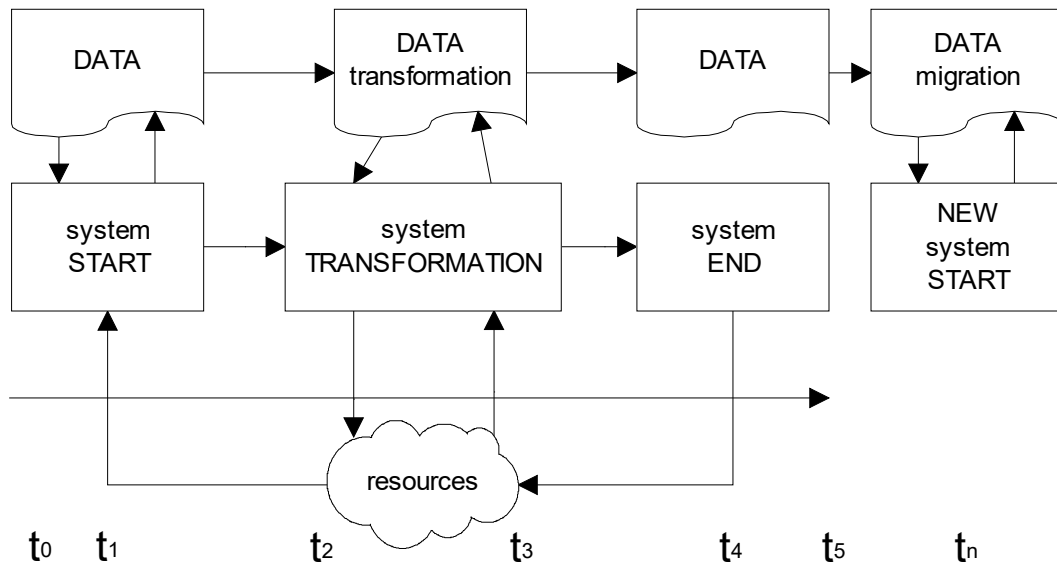242 There can several APIs when using different information systems.
243
244 The natural problem with APIs is timeline of different systems which implement different APIs.
245 There can be new and old systems which implement different APIs.
246
247
248 [Continues on the next page]

DATA → DATA transformation → DATA → DATA migration

system START → system TRANSFORMATION → system END   NEW system START

resources

t_0 t_1 t_2 t_3 t_4 t_5 t_n

249
250
251   **Proposal: Different information systems (EU-wide systems and member state systems)**
252   **could be assessed based on _informations system timelines_.**
253
254   **Proposal: Different information systems (EU-wide systems and member state systems)**
255   **could be assessed based on _implementation of different APIs_.**
256
257   **Proposal: There could be some assessments of different member state systems.**
258
259   **Note: Lifetime of different systems varies.**
260   **Note: Possibly it is not possible to consolidate all possible systems at the same**
261   **time.**
262
263   **Proposal: There could be some timetable for consolidating different systems, i.e.**
264   **cooperation between member states systems and European Union systems.**
265
266   Here can be noted that there can several APIs implemented in different information systems.
267
268
269   [Continues on the next page]
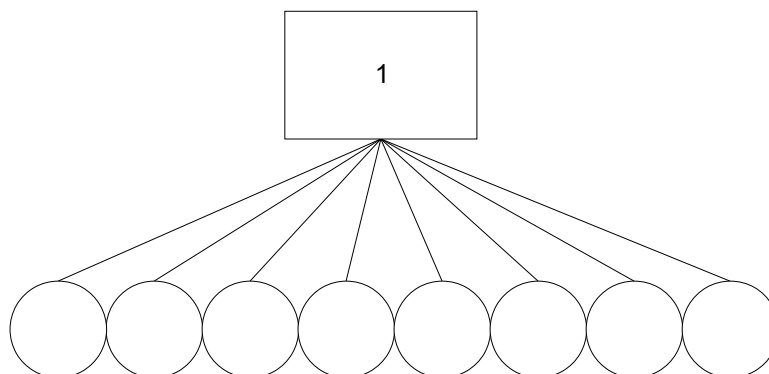
270
271
272 One issue can be different versions of APIs. Based on timelines of different systems there can be
273 different API versions in use.
274
275   **Proposal: Different API versions could be assessed very carefully.**
276
277 Based on previous issues it can be noted that in some cases an older system can implement only
278 some versions of different APIs.
279
280
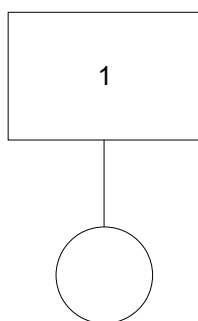
281
282
283 Here we can note different approaches for developing information systems. Some stakeholders
284 propose one well-done interface for all users of some information system. Some stakeholders
285 propose several smaller well-done interface for different users of some information system.
286
287   **Proposal: Number of different interfaces should be assessed carefully.**
288
289   **Proposal: Number of features for different interfaces should be assessed carefully.**
290
291   **Opinion: One big interface with large number of features is not the best possible
292   way for creating information systems.**
293
294   **Proposal: There could be several interfaces based on needs of different stakeholders.**
295

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296   **Favouring horizontal standards**

297

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┌─────┐ ┌─────┐ ┌─────┐ ┌─────┐ ┌─────┐
│  V  │ │  V  │ │  V  │ │  V  │ │  V  │
│  E  │ │  E  │ │  E  │ │  E  │ │  E  │
│  R  │ │  R  │ │  R  │ │  R  │ │  R  │
│  T  │ │  T  │ │  T  │ │  T  │ │  T  │
│  I  │ │  I  │ │  I  │ │  I  │ │  I  │
│  C  │ │  C  │ │  C  │ │  C  │ │  C  │
│  A  │ │  A  │ │  A  │ │  A  │ │  A  │
│  L  │ │  L  │ │  L  │ │  L  │ │  L  │
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│  ┌──┴─┴─────┴─┴──────┴─┴──┐  │ │     │
│  │      HORIZONTAL        │  │ │     │
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   ┌────────────────────────┐
   │       HORIZONTAL        │
   └────────────────────────┘
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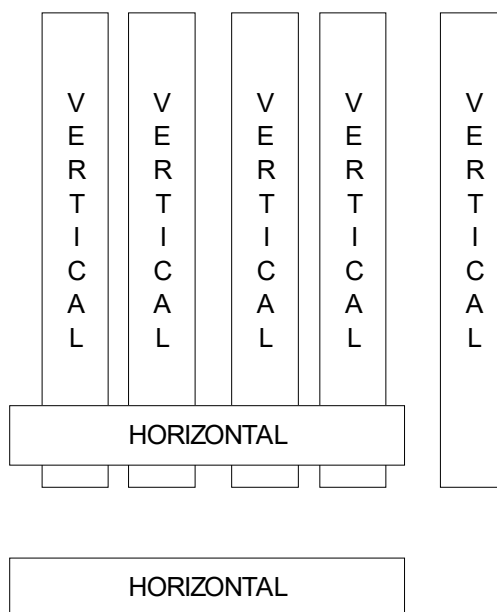
298

299

300   There are differences between horizontal and vertical standards. A simple example is naturally

301   email solutions. There are several vertical standards when creating technically email solutions. Then

302   there are horizontal standards which enable sending messages between technically different email

303   solutions.

304

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

306

307   **Proposal: Using horizontal standards could be favoured when creating different**

308   **information systems on the European Union level.**

309

310   Horizontal standards enables technological solutions which can work together. Horizontal standards

311   hides different complexities in information systems.

312

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

314

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

316

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

318   **vertical standards.**

319

320   Personally I have advocated using different horizontal standards. For example email standards

321   (horizontal) are implemented with very different technologies (vertical).

322

323   Here we can note some problems:

324
325   •   some systems are based on **de-facto** standards
326   •   some systems are based on **de-jure** standards
327   •   there can be confrontations between **de-facto** and **de-jure** standards
328   •   there can be a monopoly situation in some domain
329   •   some standards may inhibit possible actions of some stakeholders
330   •   there can be a standard war on some domains
331   •   standards have different life-cycles
332   •   systems have different life-cycles
333   •   there can be mismatches between different life-cycles
334   •   there can be failed standards
335   •   there can be deprecated standards.
336
337   It is quite normal situation in the information technology field that there are competing standards
338   for some application field. Therefore there are all the time ongoing "standards wars" or "format
339   wars". The information technology standards tend to be interrelated and one "standards war" or
340   "format war" can lead to another similar situation.
341
342   I have advocated open standards even though in some cases open standards are not de facto
343   standards. In practice public sector has very important role, when some standards are competing in
344   the market place. Because public sector has a considerable power when buying/developing
345   information systems and therefore public sector can sometimes direct markets to certain standards.
346   Therefore there should be serious vigilance when assessing different standards and "standards" in
347   some application fields.
348
349   There are different standards setting organisations on the information technology field. One list [1] of
350   these standards setting organisations is provided by ConsortiumInfo.org.
351
352   One warning can be said about standards setting organisations. All standards setting organisations
353   are not successes based on several factors and there can may irrelevant standards setting
354   organisations. Market situation on different vehicle markets varies a lot based on different factors.
355
356   **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
357   **different standard setting organisations could be assessed carefully.**
358
359   Personally I have advocated using different horizontal standards. For example email standards
360   (horizontal) are implemented with very different technologies (vertical).
361
362   **Proposal: Governments should especially concentrate on horizontal standards.**
363
364   **Proposal: Some government agencies could apply for memberships of different**
365   **standard setting organisations which develop especially horizontal standards.**
366
367   **Proposal: Government agencies should not be passive by-standers when different**

1   Standard Setting Organizations and Standards List, https://www.consortiuminfo.org/list/

368   **horizontal standards are developed.**
369
370   **Proposal: Government agencies could financially support development of horizontal**
371   **standards.**
372
373   **Proposal: There could some guidance for using open horizontal standards on different**
374   **application fields.**
375
376   **An example for cooperation: Web feeds (RSS and Atom)**
377

378
379
380   I have advocated usage of web feeds [2] on several previous opinion documents. I have advocated
381   usage of web feeds on several previous opinion documents. Actually there are two standards for
382   web feeds: RSS [3] [4] and Atom [5] [6] [7].
383
384   **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
385   **informations systems.**
386
387   **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
388   **time) information for different stakeholder(s) (communities).**
389
390   **Proposal: There can be different web feeds (RSS and/or Atom) for different**
391   **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
392   **solution.**
393
394   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
395
396   It can be easier to create web feeds in different information systems since web feeds enable
397   connections without direct system-to-system connections.
398
399   It can be noted, that different back-office systems (with a wide variety of different technologies) can
400   implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
401   kind solutions front-office systems don´t need direct system-to-system communications with back-
402   office systems.
403

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2   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), 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

404 **ANNEX 1**
405 My opinions to the previous and relevant consultations – there consultations were mostly organised
406 by the European Commission. General page to all consultations – both in English and in Finnish:
407 http://www.jukkarannila.fi/lausunnot.html
408
409 EN: Opinion 1: Review of the rules on access to documents
410 http://www.jukkarannila.fi/lausunnot.html#nro_1
411
412 EN: Opinion 2: Schools for the 21st Century
413 http://www.jukkarannila.fi/lausunnot.html#nro_2
414
415 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
416 Safe and Innovative medicines
417 http://www.jukkarannila.fi/lausunnot.html#nro_3
418
419 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
420 http://www.jukkarannila.fi/lausunnot.html#nro_5
421
422 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
423 http://www.jukkarannila.fi/lausunnot.html#nro_6
424
425 EN: Opinion 8: European Interoperability Framework, version 2, draft
426 http://www.jukkarannila.fi/lausunnot.html#nro_8
427
428 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
429 proposal for comments
430 http://www.jukkarannila.fi/lausunnot.html#nro_9
431
432 EN: Opinion 15: Collective Redress
433 http://www.jukkarannila.fi/lausunnot.html#nro_15
434
435 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
436 http://www.jukkarannila.fi/lausunnot.html#nro_17
437
438 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
439 http://www.jukkarannila.fi/lausunnot.html#nro_18
440
441 EN: Opinion 19: Official Acknowledgement by the Commission
442 http://www.jukkarannila.fi/lausunnot.html#nro_19
443
444 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
445 http://www.jukkarannila.fi/lausunnot.html#nro_20
446
447 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
448 http://www.jukkarannila.fi/lausunnot.html#nro_21

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449 EN: Opinion 23: Public consultation on the review of the European Standardisation System
450 http://www.jukkarannila.fi/lausunnot.html#nro_23
451
452 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
453 http://www.jukkarannila.fi/lausunnot.html#nro_27
454
455 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
456 http://www.jukkarannila.fi/lausunnot.html#nro_28
457
458 EN: Opinion 30: Internet Filtering
459 http://www.jukkarannila.fi/lausunnot.html#nro_30
460 NOTE: Organised by the European Committee for Standardization (CEN) [8]
461
462 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
463 http://www.jukkarannila.fi/lausunnot.html#nro_32
464
465 EN: Opinion 34: REMIT Registration Format
466 http://www.jukkarannila.fi/lausunnot.html#nro_34
467 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [9]
468
469 EN: Opinion 35: Exploiting the employment potential of the personal and household services
470 http://www.jukkarannila.fi/lausunnot.html#nro_35
471
472 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
473 http://www.jukkarannila.fi/lausunnot.html#nro_37
474
475 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
476 http://www.jukkarannila.fi/lausunnot.html#nro_39
477
478 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
479 http://www.jukkarannila.fi/lausunnot.html#nro_40
480
481 EN: Opinion 41: AT.39398: observations on the proposed commitments
482 http://www.jukkarannila.fi/lausunnot.html#nro_41
483
484 EN: Opinion 42: Opening up Education
485 http://www.jukkarannila.fi/lausunnot.html#nro_42
486
487 EN: Opinion 43: Publication of extracts of the European register of market participants
488 http://www.jukkarannila.fi/lausunnot.html#nro_43
489 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
490
491

8   http://www.cen.eu/ (Accessed 2 July 2012)
9   http://www.acer.europa.eu/ (Accessed 2 July 2012)

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Jukka S. Rannila

OPINION

15 (20)

www.jukkarannila.fi

16 August 2021

Public / WWW

492   EN: Opinion 44: Evaluation policy guidelines
493   http://www.jukkarannila.fi/lausunnot.html#nro_44
494
495   EN: Opinion 45: About ICT standardisation
496   http://www.jukkarannila.fi/lausunnot.html#nro_45
497
498   EN: Opinion 46: Review of the EU copyright rules
499   http://www.jukkarannila.fi/lausunnot.html#nro_46
500
501   EN: Opinion 51: European Area of Skills and Qualifications
502   http://www.jukkarannila.fi/lausunnot.html#nro_51
503
504   EN: Opinion 52: Trusted Cloud Europe Survey
505   http://www.jukkarannila.fi/lausunnot.html#nro_52
506
507   EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
508   http://www.jukkarannila.fi/lausunnot.html#nro_53
509   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
510
511   EN: Opinion 55: European Energy Regulation
512   http://www.jukkarannila.fi/lausunnot.html#nro_55
513   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
514
515   EN: Opinion 59: Green paper on mobile Health
516   http://www.jukkarannila.fi/lausunnot.html#nro_59
517
518   EN: Opinion 60: Cross-border inheritance tax problems within the EU
519   http://www.jukkarannila.fi/lausunnot.html#nro_60
520
521   EN: Opinion 61: European Register of Products Containing Nanomaterials
522   http://www.jukkarannila.fi/lausunnot.html#nro_61
523
524   EN: Opinion 64: Corporate Social Responsibility - European Commission
525   http://www.jukkarannila.fi/lausunnot.html#nro_64
526
527   EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
528   http://www.jukkarannila.fi/lausunnot.html#nro_66
529   EN: Opinion 68: European Network Code Stakeholder Committees
530   http://www.jukkarannila.fi/lausunnot.html#nro_68
531   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
532
533   EN: Opinion 71: Common Schema for the Disclosure of Inside Information
534   http://www.jukkarannila.fi/lausunnot.html#nro_71
535   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
536

537   EN: Opinion 74: Enabling the Internet of Things
538   http://www.jukkarannila.fi/lausunnot.html#nro_74
539   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) [10]
540
541   EN: Opinion 80: Mandatory Transparency Register
542   http://www.jukkarannila.fi/lausunnot.html#nro_80
543
544   EN: Opinion 84: Revision of the European Interoperability Framework
545   http://www.jukkarannila.fi/lausunnot.html#nro_84
546
547   EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
548   http://www.jukkarannila.fi/lausunnot.html#nro_86
549
550   EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
551   http://www.jukkarannila.fi/lausunnot.html#nro_88
552
553   EN: Opinion 89: BEREC Guidelines for net neutrality rules
554   http://www.jukkarannila.fi/lausunnot.html#nro_89
555   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
556
557   EN: Opinion 93: Safety of apps and other non-embedded software
558   http://www.jukkarannila.fi/lausunnot.html#nro_93
559
560   EN: Opinion 95: Targeted consultation on eForms
561   http://www.jukkarannila.fi/lausunnot.html#nro_95
562
563   EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
564   http://www.jukkarannila.fi/lausunnot.html#nro_97
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566   EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
567   http://www.jukkarannila.fi/lausunnot.html#nro_98
568
569   EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
570   Regulators. Recast
571   http://www.jukkarannila.fi/lausunnot.html#nro_99
572
573   EN: Opinion 100: Protection of personal data (EU)
574   http://www.jukkarannila.fi/lausunnot.html#nro_100
575
576   EN: Opinion 101: Governance of the Energy Union
577   http://www.jukkarannila.fi/lausunnot.html#nro_101
578
579   EN: Opinion 102: Smart Wearables
580   http://www.jukkarannila.fi/lausunnot.html#nro_102

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

581 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
582 (ENISA)
583 http://www.jukkarannila.fi/lausunnot.html#nro_106
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585 EN: Opinion 108: Single Digital Gateway
586 http://www.jukkarannila.fi/lausunnot.html#nro_108
587
588 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
589 http://www.jukkarannila.fi/lausunnot.html#nro_110
590
591 EN: Opinion 111: Interoperability of information systems for migration and security
592 http://www.jukkarannila.fi/lausunnot.html#nro_111
593
594 EN: Opinion 113: Transform of health and care
595 http://www.jukkarannila.fi/lausunnot.html#nro_113
596
597 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
598 Internet
599 http://www.jukkarannila.fi/lausunnot.html#nro_114
600 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
601
602 EN: Opinion 118: Fake news and online disinformation
603 http://www.jukkarannila.fi/lausunnot.html#nro_118
604
605 EN: Opinion 119: European Social Security Number
606 http://www.jukkarannila.fi/lausunnot.html#nro_119
607
608 EN: Opinion 120: European Labour Authority
609 http://www.jukkarannila.fi/lausunnot.html#nro_120
610
611 EN: Opinion 121: 2nd Data Package
612 http://www.jukkarannila.fi/lausunnot.html#nro_121
613
614 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
615 Cybersecurity Research and Competence Centre
616 http://www.jukkarannila.fi/lausunnot.html#nro_122
617
618 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
619 THE COUNCIL on the re-use of public sector information (recast)
620 http://www.jukkarannila.fi/lausunnot.html#nro_123
621
622 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
623 http://www.jukkarannila.fi/lausunnot.html#nro_125
624
625

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626   EN: Opinion 128: Summertime arrangements
627   http://www.jukkarannila.fi/lausunnot.html#nro_128
628
629   EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
630   http://www.jukkarannila.fi/lausunnot.html#nro_129
631
632   EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
633   http://www.jukkarannila.fi/lausunnot.html#nro_132
634
635   EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
636   ("eForms")
637   http://www.jukkarannila.fi/lausunnot.html#nro_133
638
639   EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
640   UCC
641   http://www.jukkarannila.fi/lausunnot.html#nro_134
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643   EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
644   http://www.jukkarannila.fi/lausunnot.html#nro_139
645
646   EN: Opinion 141: Farm Accountancy Data Network
647   http://www.jukkarannila.fi/lausunnot.html#nro_141
648
649   EN: Opinion 142: Horizon Europe (two consultations)
650   http://www.jukkarannila.fi/lausunnot.html#nro_142
651
652   EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
653   (evaluation)
654   http://www.jukkarannila.fi/lausunnot.html#nro_144
655
656   EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
657   http://www.jukkarannila.fi/lausunnot.html#nro_146
658   NOTE: Organised by the European Committee for Standardization (CEN)
659
660   EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
661   http://www.jukkarannila.fi/lausunnot.html#nro_147
662
663   EN: Opinion 152: Revision of the Non-Financial Reporting Directive
664   http://www.jukkarannila.fi/lausunnot.html#nro_152
665
666   EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
667   http://www.jukkarannila.fi/lausunnot.html#nro_154
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671 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
672 2021
673 http://www.jukkarannila.fi/lausunnot.html#nro_156
674
675 EN: Opinion 159: EU competition law - market definition notice (evaluation)
676 http://www.jukkarannila.fi/lausunnot.html#nro_159
677
678 EN: Opinion 161: New Competition Tool ('NCT')
679 http://www.jukkarannila.fi/lausunnot.html#nro_161
680
681 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
682 platforms acting as gatekeepers
683 http://www.jukkarannila.fi/lausunnot.html#nro_162
684
685 EN: Opinion 165: Legislative framework for the governance of common European data spaces
686 http://www.jukkarannila.fi/lausunnot.html#nro_165
687
688 EN: Opinion 166: Sharing information between national business registers
689 http://www.jukkarannila.fi/lausunnot.html#nro_166
690
691 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework
692 evaluation & strategy
693 http://www.jukkarannila.fi/lausunnot.html#nro_167
694
695 EN: Opinion 169: Fighting child sexual abuse: detection, removal and reporting of illegal content
696 online
697 http://www.jukkarannila.fi/lausunnot.html#nro_169
698
699 EN: Opinion 170: Data sharing in the EU - common European data spaces (new rules)
700 http://www.jukkarannila.fi/lausunnot.html#nro_170
701
702 EN: Opinion 172: Guidance on tackling disinformation (update)
703 http://www.jukkarannila.fi/lausunnot.html#nro_172
704
705 EN: Opinion 173: Declaration of Digital Principles
706 http://www.jukkarannila.fi/lausunnot.html#nro_173
707
708 EN: Opinion 174: Data Act (& amended rules on the legal protection of databases)
709 http://www.jukkarannila.fi/lausunnot.html#nro_174
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711 175: EN: Opinion 175: EU financial system - supervisory data strategy
712 http://www.jukkarannila.fi/lausunnot.html#nro_175
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