TO:
Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
European Commission


Title: Commission Implementing Regulation establishing standard forms for the publication of notices in the field of public procurement ("eForms")

First of all, a lot of thanks to Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs 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

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PART 1: Supporting different proposals based on proposed Commission Implementing Regulation establishing standard forms for the publication of notices in the field of public procurement ("eForms")

(1) EU wide procurement procedure identifier

Public feedback explanatory note (Chapter 4: Purpose) contains following:

Enabling better identification of business opportunities in the EU by introducing an EU wide procurement procedure identifier.

NOTE: I have advocated several times European Union wide identifiers (ID) based on previous consultations.

(2) Collaborative platform

Public feedback explanatory note (chapter 5: Support measures) contains following:

The Commission will prepare guidance on implementing the standard forms and will maintain a collaborative platform for the exchange of best practices and discussion of issues.

NOTE: I have advocated several times one European Union contact point (EUCP) for cooperation with member state systems.

(3) Series of services (APIs)

Public feedback explanatory note (chapter 5: Support measures) contains following:

Member States will have access to a new version of the eNotices application, currently under preparation by the Publications Office. The Publications Office will provide the forms and a series of services (APIs) that 3rd parties can re-use and integrate in their applications; this will make the development of their own applications faster and easier.

NOTE: I have advocated several times one European Union contact point (EUCP) for creating different interfaces and/or application programming interfaces (API). One European Union contact point (EUCP) could handle cooperation members state systems (MSS). Actually I have advocated member state contact point (MSCP), which could handle cooperation with members state systems (MSS).

(4) Public feedback explanatory note (Chapter 4: Purpose) contains following:

Helping improve governance by making structured buyer and seller identifiers

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mandatory and including a limited number of policy relevant fields (e.g. on green, social, and innovative procurement).

NOTE: I have noted several times different identifiers which are used in member states. There can be buyer and seller identifiers in different member state systems.

(5) Public feedback explanatory note (Chapter 6: Future updates) contains following:

In the future, after the adoption of this regulation, the Implementing Regulation on standard forms should be amended more often than in the past (e.g. every one or two years instead of every four). However, these changes should consist of minor "bugfixing" changes, not major reforms. This more agile approach is appropriate for an IT environment, which eForms are unavoidably part of, and will avoid the current situation where problems often go unsolved for years. Such an approach also corresponds well with the flexibility given by the advisory procedure, an administratively light procedure, which is used for adopting the act.

NOTE: I have noted several times that there can be different versions of different interfaces, identifiers and standards.

NOTE: Proposed timetable for changes (e.g. interfaces, identifiers and standards) can mean usage of several versions.

(6) Public feedback explanatory note (Chapter 6: Future updates) contains following:

Besides allowing technical improvement to the standard forms, this responsive approach to legislation will also allow Member States to innovate in the area of data while respecting the Directives' provision that "Notices published at national level shall not contain information other than that contained in the notices dispatched to the Publications Office of the European Union." Specifically, Member States will be able to add fields at national level, because these will then be added (as optional) also at the EU level. Thus, equal treatment for companies will be ensured while Member States will be able to innovate for the sake of competition and transparency.

NOTE: Based on some consultations I have noted need different free-form fields (concepts) for different information systems.

Opinion: Proposed solution for adding optional fields (concepts) can be supported.

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PART 2: Some comments based on previous mentioned issues

Even though feedback explanatory note contains issues, which can be supported, I present some issues to be consider after this consultation:

(A) EU wide procurement procedure identifier

About different identifiers (ID)

Developing a standardised member state contact point (MSCP) means some work to be done. Here we can note that there will be several identifiers when developing new systems and maintaining current systems (EUCP ↔ MSCP).

I have proposed several times to use open and public identifiers when developing different information system.

More and more new identifiers (ID)

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

Examples of these identifiers (ID) are following:

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

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

Proposal: There could be a systematic review of different identifiers (ID) at different levels.

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

Different information systems have also internal identifiers (ID) and external identifiers (ID) for (possible) public usage. The added value for different stakeholders is provided by combination of
different identifiers (ID) in a specific information system.

Proposal: The could be some assessment(s) based on different versions of different identifiers (ID).

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

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

When information about relevant identifiers is collected, there could be a serious assessment of possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier, there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

Proposal: The nature of different identifiers (ID) could be assessed.

Proposal: There could be serious negotiations with some providers of identifiers (ID).

In the European Union there has been different anti-trust cases which are related to different private sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

Question: What this means to Commission Implementing Regulation establishing standard forms for the publication of notices in the field of public procurement ("eForms")?

Answer: This means that there can be several identifiers (ID) for different information systems.

Proposal: Proposed systems have to support several identifier (ID) versions at the same time.
Answer: New information systems may be developed in the future and those new information systems can use different identifiers (ID).

(B) Collaborative platform

Complexity at the European Union level

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

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

Here we can calculate connections based on number of information systems.

<table>
<thead>
<tr>
<th>Connections</th>
<th>Systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 x 28</td>
<td>28</td>
</tr>
<tr>
<td>5 x 28</td>
<td>140</td>
</tr>
<tr>
<td>10 x 28</td>
<td>280</td>
</tr>
<tr>
<td>15 x 28</td>
<td>420</td>
</tr>
<tr>
<td>20 x 28</td>
<td>560</td>
</tr>
<tr>
<td>28 x 30</td>
<td>840</td>
</tr>
</tbody>
</table>

Proposal: Complex system-to-system connections implemented in information systems could be assessed carefully.
Naturally there could be direct contacts between different member state systems (MSS) and European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large number of different member state system. Based on 28 member state systems there could be hundreds of connections. One option is to have a single European contact point for member state systems. Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems, (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There are unique situations with member statesystems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).

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

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Based on those calculations there could be a lot of direct connections to the European contact point. Number of those connections can be overwhelming. The situation between member states can vary in many ways. So there can different and unique systems between member states. I have proposed several times creation of member state contact points which could handle different system-to-system connections at member state level. Then it can be easier to create connections between member state contact points and European contact point.

Proposal: There could be one information system (member state contact point, MSCP) at member state level.

Proposal: Different member state systems could be consolidated based on limited number system-to-system connections (MSCP ↔ MSS).

Proposal: One information system (member state contact point, MSCP) at member state level could handle system-to-system connections at the European Union level (European contact point) (EUCP ↔ MSCP).

Proposal: There could be some serious work for developing a standardised member state contact points (MSCP).

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

Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European Union level.

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

Question: What this means to Commission Implementing Regulation establishing standard forms for the publication of notices in the field of public procurement ("eForms")?

Answer: Consolidation of different (EUCP ↔ MSCP ↔ MSS) information systems can mean work for several years.

Answer: Different Member State Systems (MSS) have their own life-cycles.
Answer: Proposed cooperation between (EUCP ↔ MSCP ↔ MSS) different systems have different problems based on life-cycles of systems.

Answer: The European Commission and member states can agree on changes for different systems based on life-cycles of different systems.

(C) Series of services (APIs)

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Previously there has been discussion about different identifiers (ID). Public feedback explanatory note notices different application programming interfaces. Here can be repeated that there can be several identifiers (ID) and different application programming interfaces (API).

There can be several layers of identifiers (ID) and application programming interfaces (API). Identifiers (ID) and application programming interfaces (API) can also implement different standards.

**Question:** What this means to Commission Implementing Regulation establishing standard forms for the publication of notices in the field of public procurement ("eForms")?

**Answer:** There can be some new standards for identifiers (ID) and application programming interfaces (API) in the future.

**Answer:** Assessing different layers of identifiers (ID) and application programming interfaces (API) can mean some new development work (EUCP ↔ MSCP ↔ MSS).

**Answer:** Like mentioned before there can be different versions for identifiers (ID) and application programming interfaces (API).

**Answer:** In some cases (EUCP ↔ MSCP ↔ MSS) there can identifiers (ID) and application programming interfaces (API) which are not develop by European Commission or member states.

NOTE: In some cases Directorate-General for Competition (European Commission) has assessed different identifiers (ID). In some cases some identifiers (ID) may cause monopoly situation.

**(D) Adding optional fields (concepts)**

**Answer:** Adding optional fields (concepts) can be supported even though there are already a lot of proposed fields – i.e. standard forms for the publication of notices in the field of public procurement.

**Answer:** It is always possible to have new fields (concepts).

**(E) About different standards for assessing publication of notices in the field of public procurement**

About different standards

I have proposed several times usage of *open horizontal standards* when developing different information systems.

**Favouring open standards / Favouring horizontal standards**

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

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

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

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

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

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

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

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

Here we can note that different national details can be vertical standards.
Proposal: Different (vertical) national details (standards) should not hinder usage of (European) other standards (horizontal).

Here we can note some problems:

- 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.

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.

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

There are different standards setting organisations on the information technology field. One list of these standards setting organisations is provided by ConsortiumInfo.org.

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

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

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

Proposal: Governments should especially concentrate on horizontal standards.

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

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

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

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

(F) Modelling different processes

Here can be noted that procurement processes can vary when doing procurement.

Opinion: Concept definitions are very good based on the annex for main consultation document.

However, there is not too much considerations about different process models for procurement. Since concepts are well revised and presented it is possible to create good process models for procurement.

Proposal: Different procurement process models could be presented – for example as flowcharts (previous figure).
Proposition: Processes with external stakeholders could be modelled.

Proposition: There could be possibilities for describing and modelling different process models for procurement.

Problems naturally arise since processes and outcomes can clear or unclear. Naturally it is easier to model processes when processes and outcomes are very clear.

Proposal: There could be well-revised process models which could be used when procuring something.
Here can noted that different processes have their lifetime and during lifetime there are several events and states. It is possible to document every instance of events and states. Documentation (events and states) can mean traditional documents and/or electronic systems.

**G) Cooperation between systems – direct connections or transmitting documents?**

Here we can note following basic functions of different information systems:

- add data
- retrieve data
- change data
- remove data
- administration of an information system
- data as documents
- direct connections between systems
- displays and interfaces
- communication between systems.

Proposal: Direct connections between systems should be assessed carefully.

Proposal: Connections between systems based on documents should be assessed carefully.

**H) Number of different features for procurement systems**

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Here can noted number of different features when using some information system.

Proposal: Number of different features for different systems should be assessed carefully.

Proposal: Number of different interfaces should be assessed carefully.

Proposal: Number of features for different interfaces should be assessed carefully.

Opinion: One big interface with large number of features is not the best possible way for creating information systems.

Proposal: There could be several interfaces based on needs of different stakeholders.

(I) Developing technical regulations for procurement systems
Previously I have advocated development of open solutions (e.g. open standards) to be used in different phases for procurement processes. Like mentioned before there are several issues to be considered when developing different systems.

Proposal: There could be a process model for developing technical regulations.

Proposal: Different consultations about technical issues could be transmitted to
different (national?) information technology expert associations.

Proposal: There should be a clear process for developing and assessing technical regulations – e.g. two phases for assessing technical issues.

(J) Other issues

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

I have advocated usage of web feeds\(^2\) on several previous opinion documents. Actually there are two standards for web feeds: RSS\(^3\) and Atom\(^5\)\(^6\)\(^7\).

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

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

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

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

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

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

\(^2\) [https://en.wikipedia.org/wiki/Web_feed](https://en.wikipedia.org/wiki/Web_feed)
\(^3\) [http://www.rssboard.org/rss-specification](http://www.rssboard.org/rss-specification), RSS 2.0 Specification
\(^4\) [https://en.wikipedia.org/wiki/RSS](https://en.wikipedia.org/wiki/RSS), Wikipedia / RSS

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ANNEX 1

My opinions to the previous and relevant consultations – these 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

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

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

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EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19
EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20
EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
http://www.jukkarannila.fi/lausunnot.html#nro_21
EN: Opinion 23: Public consultation on the review of the European Standardisation System
http://www.jukkarannila.fi/lausunnot.html#nro_23
EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
http://www.jukkarannila.fi/lausunnot.html#nro_27
EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_28
EN: Opinion 30: Internet Filtering
http://www.jukkarannila.fi/lausunnot.html#nro_30
NOTE: Organised by the European Committee for Standardization (CEN)
http://www.jukkarannila.fi/lausunnot.html#nro_32
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
EN: Opinion 35: Exploiting the employment potential of the personal and household services
http://www.jukkarannila.fi/lausunnot.html#nro_35
EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
http://www.jukkarannila.fi/lausunnot.html#nro_37
EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
http://www.jukkarannila.fi/lausunnot.html#nro_39
EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
http://www.jukkarannila.fi/lausunnot.html#nro_40
EN: Opinion 41: AT.39398: observations on the proposed commitments
http://www.jukkarannila.fi/lausunnot.html#nro_41


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EN: Opinion 68: European Network Code Stakeholder Committees
http://www.jukkarannila.fi/lausunnot.html#nro_68
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 71: Common Schema for the Disclosure of Inside Information
http://www.jukkarannila.fi/lausunnot.html#nro_71
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 74: Enabling the Internet of Things
http://www.jukkarannila.fi/lausunnot.html#nro_74
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 80: Mandatory Transparency Register
http://www.jukkarannila.fi/lausunnot.html#nro_80

EN: Opinion 84: Revision of the European Interoperability Framework
http://www.jukkarannila.fi/lausunnot.html#nro_84

EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
http://www.jukkarannila.fi/lausunnot.html#nro_86

EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
http://www.jukkarannila.fi/lausunnot.html#nro_88

EN: Opinion 89: BEREC Guidelines for net neutrality rules
http://www.jukkarannila.fi/lausunnot.html#nro_89
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 93: Safety of apps and other non-embedded software
http://www.jukkarannila.fi/lausunnot.html#nro_93

EN: Opinion 95: Targeted consultation on eForms
http://www.jukkarannila.fi/lausunnot.html#nro_95

http://www.jukkarannila.fi/lausunnot.html#nro_97

EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
http://www.jukkarannila.fi/lausunnot.html#nro_98

http://www.jukkarannila.fi/lausunnot.html#nro_99

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

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EN: Opinion 100: Protection of personal data (EU)
http://www.jukkarannila.fi/lausunnot.html#nro_100

EN: Opinion 101: Governance of the Energy Union
http://www.jukkarannila.fi/lausunnot.html#nro_101

EN: Opinion 102: Smart Wearables
http://www.jukkarannila.fi/lausunnot.html#nro_102

http://www.jukkarannila.fi/lausunnot.html#nro_106

EN: Opinion 108: Single Digital Gateway
http://www.jukkarannila.fi/lausunnot.html#nro_108

EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
http://www.jukkarannila.fi/lausunnot.html#nro_110

EN: Opinion 111: Interoperability of information systems for migration and security
http://www.jukkarannila.fi/lausunnot.html#nro_111

EN: Opinion 113: Transform of health and care
http://www.jukkarannila.fi/lausunnot.html#nro_113

EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the Internet
http://www.jukkarannila.fi/lausunnot.html#nro_114

NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 118: Fake news and online disinformation
http://www.jukkarannila.fi/lausunnot.html#nro_118

EN: Opinion 119: European Social Security Number
http://www.jukkarannila.fi/lausunnot.html#nro_119

EN: Opinion 120: European Labour Authority
http://www.jukkarannila.fi/lausunnot.html#nro_120

EN: Opinion 121: 2nd Data Package
http://www.jukkarannila.fi/lausunnot.html#nro_121

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EN: Opinion 122: Proposal to create a cybersecurity competence network with a European Cybersecurity Research and Competence Centre
http://www.jukkarannila.fi/lausunnot.html#nro_122

EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the re-use of public sector information (recast)
http://www.jukkarannila.fi/lausunnot.html#nro_123

EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
http://www.jukkarannila.fi/lausunnot.html#nro_125

EN: Opinion 128: Summertime arrangements
http://www.jukkarannila.fi/lausunnot.html#nro_128

EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
http://www.jukkarannila.fi/lausunnot.html#nro_129

EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
http://www.jukkarannila.fi/lausunnot.html#nro_132

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:
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ANNEX 2

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