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2 TO:
3 Directorate-General for Health and Food Safety
4 European Commission
5
6
7 **The Information management system for official controls Regulation (IMSOC)**

8
9 **Ref. Ares(2019)3294976 - 20/05/2019**
10 **(Committee: C20410)**

11
12
13 First of all, a lot of thanks to Directorate-General for Health and Food Safety for organising this
14 important consultation.

15
16 This opinion represents an opinion of an individual citizen, not any legal entity.

17
18 This opinion does not contain:
19 – any business secrets
20 – any trade secrets
21 – any confidential information.

22
23 This opinion is public.
24 PDF file of this opinion can be added to a relevant web page.

25
26 Annex 1 holds information about previous consultations at the European Union level.
27 Annex 2 holds information about disclaimers and copyright.

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31 Best Regards,

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33
34
35 Jukka S. Rannila
36 citizen of Finland
37
38 signed electronically

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40
41 [Continues on the next page]
42

43

44 About previous consultations / Repeating several issues

45

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

49

50 Highlighting only some issues

51

52 Proposed IMSOC Regulation (this consultation) implements several proposals which I have
53 presented to different units of the European Commission. This opinion does not handle all issues
54 which are mentioned on consultation documents.

55

56 More and more identifiers (ID)

57

58 In the previous consultations there has been discussion about different identifiers (ID) in different
59 systems. It can be noted from the previous opinions, that there will be several and different
60 identifiers (ID) for different levels. At the European Union level there can be several identifiers
61 (ID), e.g. following:

62

63 * global identifiers (ID)

64 * EU-wide identifiers (ID)

65 * general member state identifiers (ID)

66 * several identifiers (ID) in member states.

67

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

69

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

72

73 Examples of these identifiers are following:

74

75 1) Facebook ID for an individual person

76 2) Facebook ID for the individual up-dates of individuals

77 3) Data Universal Numbering System (D-U-N-S)

78 4) Reuters instruments codes (RICs)

79 5) Social security code for individual citizens in the European Union member states

80 6) Business identity code for a company in an European Union member state

81 7) Value added tax code for a company in an European Union member state.

82

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

86

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89 The information systems were established at different times and have since been modified on legal
90 and operational grounds.

91

92 **More new identifiers (ID)?**

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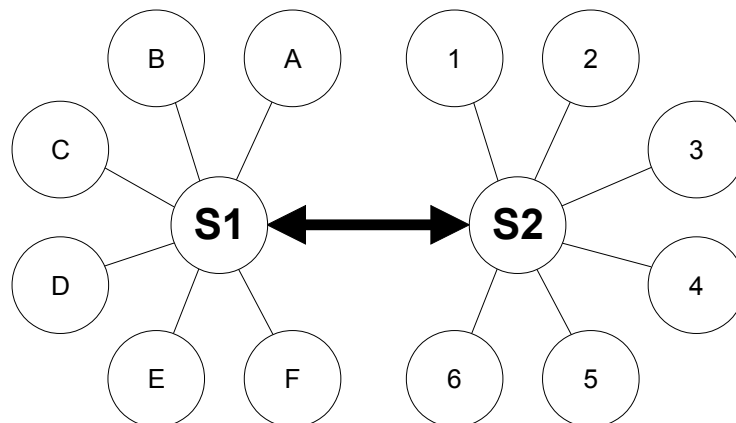
94 The current reality is, that there will be more and more IDs, since digitalisation of different areas
95 will result new IDs and/or combination of new and old IDs.

96

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

103

1-2



104

105

106

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

107

108

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

110

111

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

113

114

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

116

117

Some issues to be consider – public systems and private systems?

118

119 Here we can note following combinations:

- 120 • public ↔ public
- 121 • private ↔ private
- 122 • private ↔ public
- 123 • (public ↔ private)

124

125 Based on previous considerations there could be some efforts:

126

- 127 • There could be some adjustments for (public ↔ public) public information systems.
- 128 • There could be some adjustments for (private ↔ private) private information systems.
- 129
- 130 • There could be some adjustments for (private ↔ public) cooperation between public and private information systems.

131

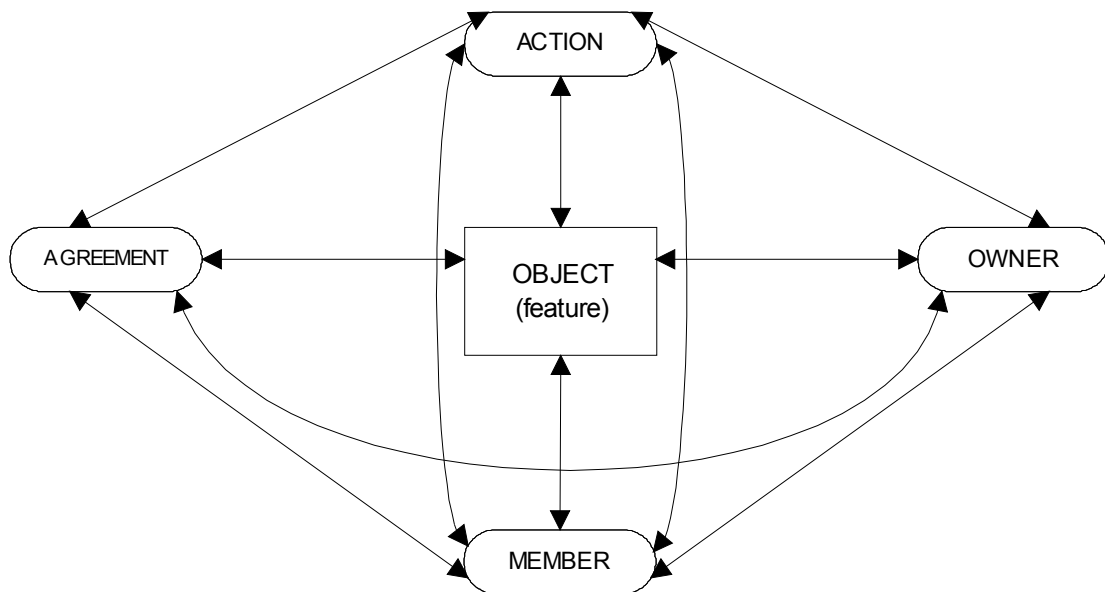
132

133 **There can be some examples:**

134

- 135 **a) There could be some regulations for providing interfaces (private, public)**
- 136 **b) There could be some regulations for document formats (private, public)**
- 137 **c) There could be some regulations for transmitting data between different systems**
- 138 **d) There could be some regulations for using databases (private, public)**
- 139 **e) There could be some regulations for using programs (private, public)**
- 140 **f) There could be some regulations for retrieving information from different systems.**

141



142

143

Note: The relations between different aspects of information systems can result rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.

144

145

146

147

Here we can note the difference between owners, agreements and members. In reality ownerships agreements and memberships cause very complex networks, and those networks are changing all

148 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
149 entities, life-cycles, etc.

150

151 Here we can note that ownership, agreement and membership are interlinked in different ways.

152 Generally speaking average usage of a system means an unique combination of ownership,
153 agreement and membership. When everything works fine there are not problems. However changes
154 with ownership, agreement and membership can result difficult situations.

155

156 In the previous consultations I have advocated following solution as the maximum solution:

157

158 * public sector institute owns the machinery and processor of the information system

159 * the machinery and processor are based on relevant open standards

160 * the operating system is based on an open-source solution

161 * public sector institute owns the source code of the information system

162 * public sector institute owns the database of the information system

163 * the database is based on open-source solution and on relevant open standards

164 * public sector institute owns all data in the information system.

165

	Owner? Member? Agreement?	Standards?	OPEN	CLOSED
1. Device / Machinery				
2. Operating system				
3. Program(s)				
4. Data models / Conceptual models				
5. Documents				
6. Databases				
7. Communications				
8. Retrieve / Interface / Display				
9. Add / Interface / Display				
10. Remove / Interface / Display				
11. Change / Interface / Display				

166

167 Naturally, there can be solutions, which are not based on the maximum solution. It can be
168 concluded, that this consultation is not (yet) about technical details.

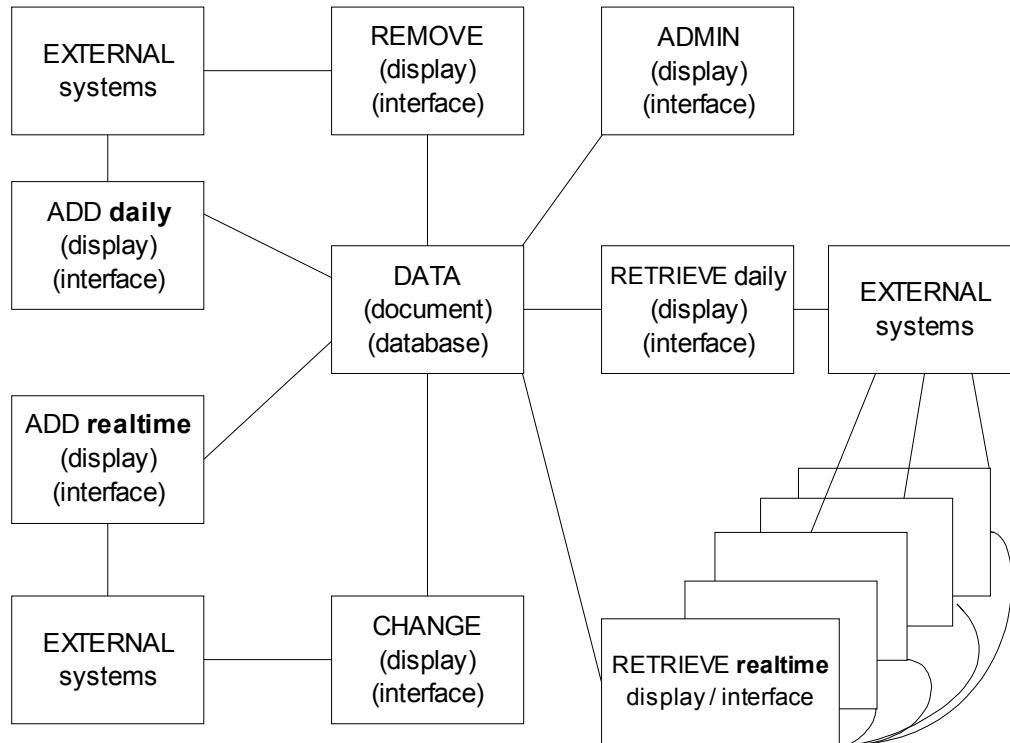
169

170 **Note: The relations between different aspects of information systems can result**
171 **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**

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Proposal: There could be some considerations for assessing possible / future changes in ownerships, agreements and memberships.

Different time frames for different information systems



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179

Like the previous figure indicates, there is difference between real-time systems and other systems.

181

Proposal: There can be different real-time systems, and the need for different real-time systems could be assessed.

184

Proposal: There can different systems with other time frames, and the need for systems should with different time frames could be assessed

187

In some cases there is a clear need for different replicated information systems.

189

It can be noted, that there can be different options for layered systems: real-time or other time periods. Generally speaking, (real-time) retrieval is the most used function, and adding, changing and removing can have different time-periods.

193

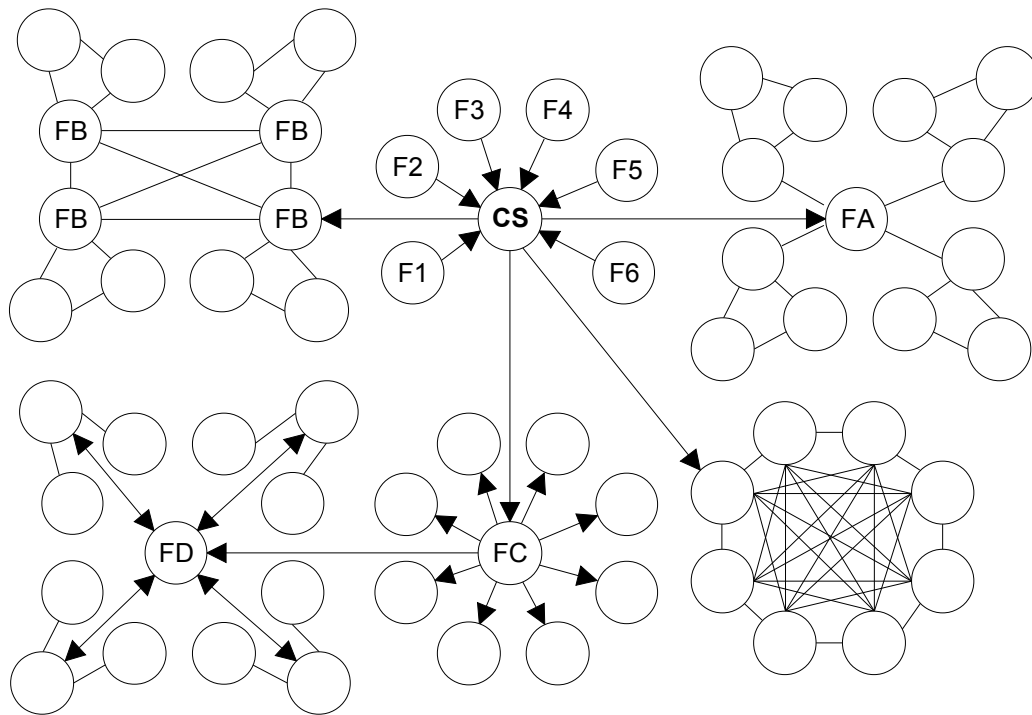
Complex networks of different systems?

195

The reality: There will be several layered systems developed by several stakeholder communities

196

197 (both for-profit and non-profit communities).
 198



199
 200
 201 Here we can note that there can some central systems (CS) and information from those central
 202 systems can be distributed to several other systems. In reality the added value for users (citizens and
 203 different legal entities) is achieved by combining different systems to provide different
 204 services.

205
 206 We can note that there can several formats (e.g. 1-6, A-D) for transmitting information from some
 207 central (CS) information system. Some formats may be non-standard or standard.

208
 209 **Proposal: There could be some efforts for developing some central systems.**

210
 211 The practical reality is that there will be several central systems – not all-powerful one central
 212 system.

213
 214 **Proposal: There could be some efforts for standardising different central systems.**

215
 216 **About different standards**

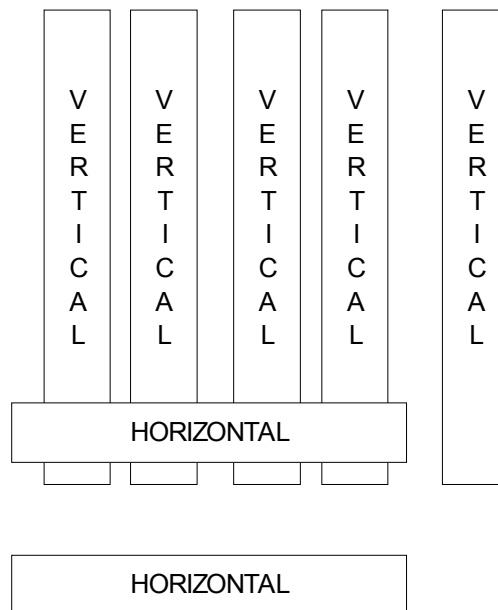
217
 218 Proposed IMSOC regulation document contains following text:

219
 220 Data exchanges between the IMSOC and other electronic systems, including the Member
 221 States’ national systems, shall:

223 (a) be based on international standards that are relevant for the system component
 224 and use XML, CMS or PDF formats;
 225 (b) use the specific data dictionaries and business rules provided for in the relevant
 226 IMSOC component.

227
 228 Data exchanges between TRACES and other electronic systems, including the Member
 229 States' national systems, shall be synchronous, reciprocal and based on UN/CEFACT, IPPC
 230 and OIE standards.

231
 232 **Favouring open standards / Favouring horizontal standards**
 233



234
 235
 236 There are differences between horizontal and vertical standards. A simple example is naturally
 237 email solutions. There are several vertical standards when creating technically email solutions. Then
 238 there are horizontal standards which enable sending messages between technically different email
 239 solutions.

240
 241 **Proposal: There could be assessment of vertical and horizontal standards.**

242
 243 **Proposal: Using horizontal standards could be favoured when creating different**
 244 **information systems on the European Union level.**

245
 246 Horizontal standards enables technological solutions which can work together. Horizontal standards
 247 hides different complexities in information systems.

248
 249 **Opinion: The number of redundant standardisation efforts should be minimal.**
 250

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

252

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

255

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

258

259 Here we can note some problems:

260

- 261 • some systems are based on **de-facto** standards
- 262 • some systems are based on **de-jure** standards
- 263 • there can be confrontations between **de-facto** and **de-jure** standards
- 264 • there can be a monopoly situation in some domain
- 265 • some standards may inhibit possible actions of some stakeholders
- 266 • there can be a standard war on some domains
- 267 • standards have different life-cycles
- 268 • systems have different life-cycles
- 269 • there can be mismatches between different life-cycles
- 270 • there can be failed standards
- 271 • there can be deprecated standards.

272

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

277

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

284

285 There are different standards setting organisations on the information technology field. One list ¹ of
286 these standards setting organisations is provided by ConsortiumInfo.org.

287

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

291

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

294

1 Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

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

297
 298 **Proposal: Governments should especially concentrate on horizontal standards.**

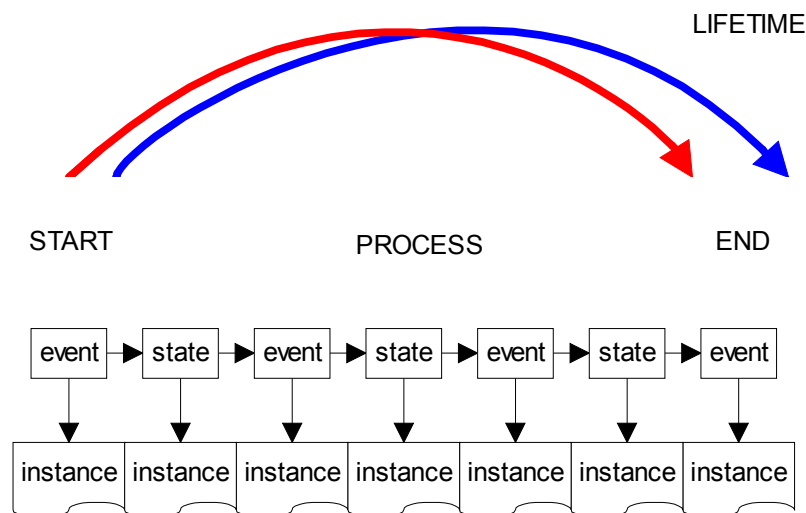
299
 300 **Proposal: Some government agencies could apply for memberships of different**
 301 **standard setting organisations which develop especially horizontal standards.**

302
 303 **Proposal: Government agencies should not be passive by-standers when different**
 304 **horizontal standards are developed.**

305
 306 **Proposal: Government agencies could financially support development of horizontal**
 307 **standards.**

308
 309 **Proposal: There could some guidance for using open horizontal standards on different**
 310 **application fields.**

311
 312 **Processes, events, states, lifetime, instances, start and end**
 313



314
 315
 316 Finally some important concepts can be noted: processes, events, states, lifetime, instances start and
 317 end. It can be noted that during the lifetime of an information system there can be significant changes
 318 with the selected and implemented standards.

319
 320 **Proposal: Based on the results of this consultation European Commission could create**
 321 **a roadmap/timeline for implementing different interoperable systems.**

322
 323 **Proposal: Based on the results of this consultation could create roadmap/timeline for**
 324 **consolidating different interoperable systems**

325
 Copyright, licence and disclaimers: check Annex 2.

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

328

329 Here we note that different information system have different lifetime based on several issues.

330 Therefore there could be clear roadmap for different information systems based on lifetime.

331

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

333



334

335

336 I have advocated usage of web feeds² on several previous opinion documents. Actually there are
337 two standards for web feeds: RSS^{3 4} and Atom^{5 6 7}.

338

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

341

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

344

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

348

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

350

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

353

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

358

359 **Possible technical consultations – ANNEX I – Content of notifications referred to in Article 32**

360

361 Annex I (consultation document) contains different data fields to be implemented.

362

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

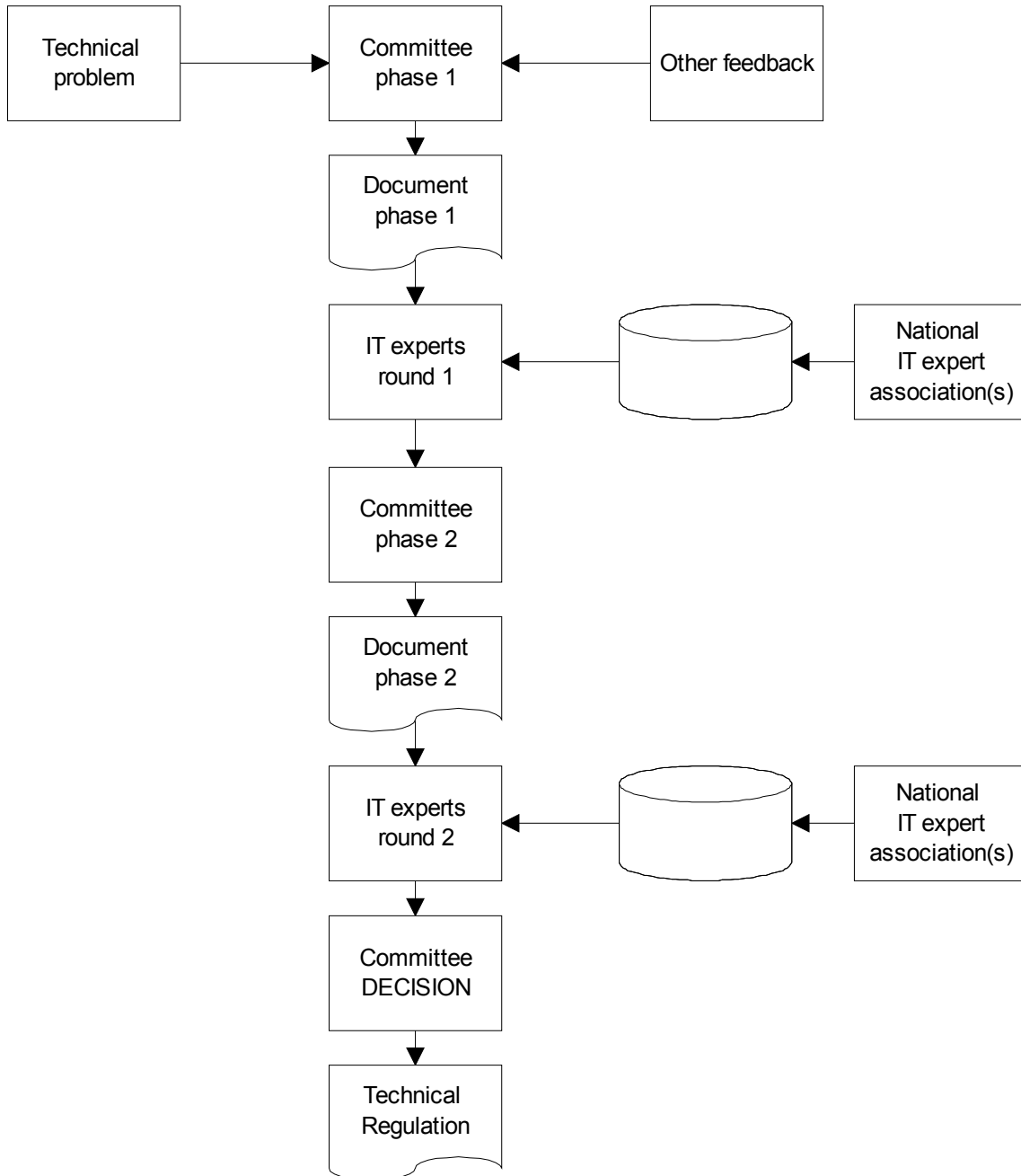
5 [https://en.wikipedia.org/wiki/Atom_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

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

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

363
364
365

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



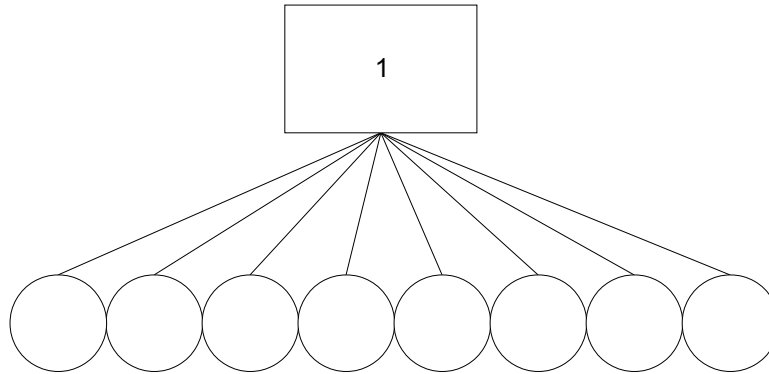
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An example of more technical consultation could be assessment of different XML formats. One option is distributing information about technical consultations to different information technology expert associations. Naturally there can be different phases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

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

Different versions of displays and interfaces?



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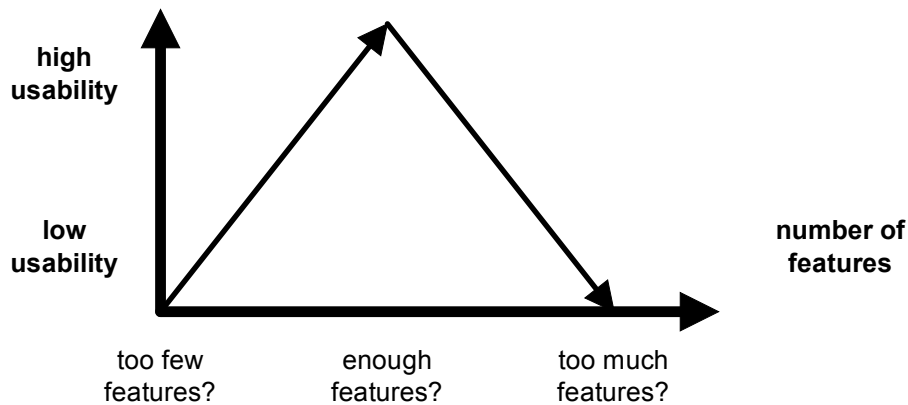
One system may have several displays and interfaces. One problem is different versions of displays and interfaces.

Proposal: There could be assessment about different versions of displays and interfaces.

Note: Different systems implement different versions for displays and interfaces.

Note: Information systems implementing different versions for displays and interfaces can mean lot of work.

Number of features



393

394

395 One problem is number of different features. In some cases there can be too much features which
396 means low usability.

397

398

Proposal: Number of different features should be assessed carefully.

399

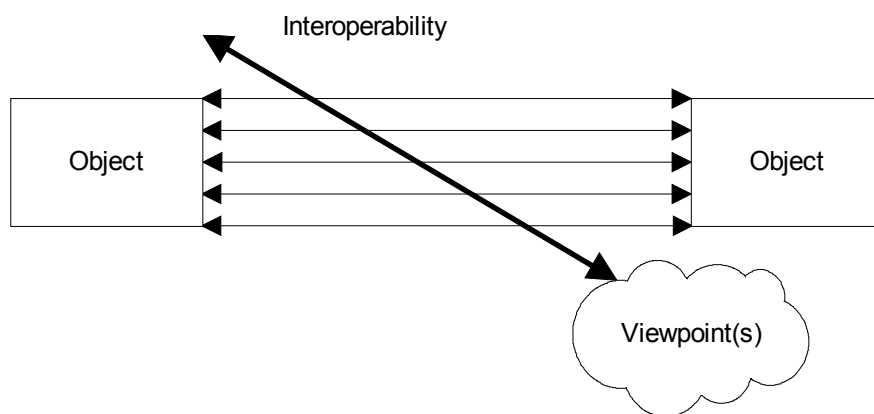
400

Note: In some cases there are actually too much features.

401

402 **Assessing different viewpoints**

403



404

405

406 Interoperability between different objects (also information systems) can be assessed based on
407 different viewpoints.

408

409 **Proposal: There could be assessment about interoperability based on different
410 viewpoints.**

411

412 **Proposal: Different viewpoints could be assessed systemically.**

413

414

415 **Good luck!!!**

416

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

419

420 [Continues on the next page]

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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

- 466 EN: Opinion 19: Official Acknowledgement by the Commission
467 http://www.jukkarannila.fi/lausunnot.html#nro_19
468
- 469 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
470 http://www.jukkarannila.fi/lausunnot.html#nro_20
471
- 472 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
473 http://www.jukkarannila.fi/lausunnot.html#nro_21
474
- 475 EN: Opinion 23: Public consultation on the review of the European Standardisation System
476 http://www.jukkarannila.fi/lausunnot.html#nro_23
477
- 478 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
479 http://www.jukkarannila.fi/lausunnot.html#nro_27
480
- 481 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
482 http://www.jukkarannila.fi/lausunnot.html#nro_28
483
- 484 EN: Opinion 30: Internet Filtering
485 http://www.jukkarannila.fi/lausunnot.html#nro_30
486 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
487
- 488 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
489 http://www.jukkarannila.fi/lausunnot.html#nro_32
490
- 491 EN: Opinion 34: REMIT Registration Format
492 http://www.jukkarannila.fi/lausunnot.html#nro_34
493 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
494
- 495 EN: Opinion 35: Exploiting the employment potential of the personal and household services
496 http://www.jukkarannila.fi/lausunnot.html#nro_35
497
- 498 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
499 http://www.jukkarannila.fi/lausunnot.html#nro_37
500
- 501 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
502 http://www.jukkarannila.fi/lausunnot.html#nro_39
503
- 504 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
505 http://www.jukkarannila.fi/lausunnot.html#nro_40
506
- 507 EN: Opinion 41: AT.39398: observations on the proposed commitments
508 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

⁹ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 509
510 EN: Opinion 42: Opening up Education
511 http://www.jukkarannila.fi/lausunnot.html#nro_42
512
513 EN: Opinion 43: Publication of extracts of the European register of market participants
514 http://www.jukkarannila.fi/lausunnot.html#nro_43
515 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
516
517 EN: Opinion 44: Evaluation policy guidelines
518 http://www.jukkarannila.fi/lausunnot.html#nro_44
519
520 EN: Opinion 45: About ICT standardisation
521 http://www.jukkarannila.fi/lausunnot.html#nro_45
522
523 EN: Opinion 46: Review of the EU copyright rules
524 http://www.jukkarannila.fi/lausunnot.html#nro_46
525
526 EN: Opinion 51: European Area of Skills and Qualifications
527 http://www.jukkarannila.fi/lausunnot.html#nro_51
528
529 EN: Opinion 52: Trusted Cloud Europe Survey
530 http://www.jukkarannila.fi/lausunnot.html#nro_52
531
532 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
533 http://www.jukkarannila.fi/lausunnot.html#nro_53
534 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
535
536 EN: Opinion 55: European Energy Regulation
537 http://www.jukkarannila.fi/lausunnot.html#nro_55
538 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
539
540 EN: Opinion 59: Green paper on mobile Health
541 http://www.jukkarannila.fi/lausunnot.html#nro_59
542
543 EN: Opinion 60: Cross-border inheritance tax problems within the EU
544 http://www.jukkarannila.fi/lausunnot.html#nro_60
545
546 EN: Opinion 61: European Register of Products Containing Nanomaterials
547 http://www.jukkarannila.fi/lausunnot.html#nro_61
548
549 EN: Opinion 64: Corporate Social Responsibility - European Commission
550 http://www.jukkarannila.fi/lausunnot.html#nro_64
551
552 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
553 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 554
555 EN: Opinion 68: European Network Code Stakeholder Committees
556 http://www.jukkarannila.fi/lausunnot.html#nro_68
557 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
558
559 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
560 http://www.jukkarannila.fi/lausunnot.html#nro_71
561 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
562
563 EN: Opinion 74: Enabling the Internet of Things
564 http://www.jukkarannila.fi/lausunnot.html#nro_74
565 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
566
567 EN: Opinion 80: Mandatory Transparency Register
568 http://www.jukkarannila.fi/lausunnot.html#nro_80
569
570 EN: Opinion 84: Revision of the European Interoperability Framework
571 http://www.jukkarannila.fi/lausunnot.html#nro_84
572
573 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
574 http://www.jukkarannila.fi/lausunnot.html#nro_86
575
576 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
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¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

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- 671
- 672 My opinions to the previous and relevant consultations – there consultations were mostly organised
673 by the European Commission. General page to all consultations – both in English and in Finnish:
674 <http://www.jukkarannila.fi/lausunnot.html>
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