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Interoperable Europe Act
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Interoperability is a cornerstone of a well-functioning single market and European data economy. The European Interoperability Framework (EIF) plays a key role in advancing interoperability by drawing attention to all four layers of interoperability (legal, organisational, semantic, technical) and making recommendations from that starting point. CSC is pleased to note that the present proposal for an Interoperable Europe Act (IEA) is based on the same approach as the EIF and intends to strengthen and further develop it.

While it is good to support the non-binding EIF with some degree of binding regulation, the obligations created by the IEA must be proportionate to avoid causing unnecessary administrative burden, especially in sectors that already have strong structures steering interoperability (e.g. GÉANT/research networks). Regulation must leave room for bottom-up, community-driven development of shared standards and policies, which is the most sustainable way to achieve functional, user-centric solutions to which all parties are fully committed. In this vein, we highly appreciate the notions of co-creation and participatory processes in the proposal. These must not only concern public sector bodies as such but also those affected by public-sector interoperability solutions, especially academia.

Our emphasis on bottom-up processes does not mean that we believe interoperability will happen completely on its own, without any steering or coordination. On the contrary, we feel that a Union-level coordinating body is needed to ensure uniform understanding and application of the jointly developed interoperability standards and policies. The European Interoperability Board (IEB) must be able to play such a role and must therefore be equipped with a strong mandate and wide array of expert input needed in its work.

The mandate of the IEB must also be wide enough to cover issues related to all four levels of interoperability. At the legal level, the IEB must promote identifying and removing any legal barriers to interoperability in all existing and upcoming legislation at EU and national level. At the organisational level, the IEB, together with the Interoperable Europe Community (IEC), must take concrete steps to bridge the gaps between different organisational cultures to facilitate cooperation. At the semantic level, the IEB must work towards ensuring a functional enterprise architecture model with common data policies, FAIR data vocabularies, code sets, metadata and information models. At the technical level, the IEB must continue to look for ways to reduce the fragmentation of ICT solutions across national and sectoral borders. In general, the technical layer is typically the easiest one to make interoperable, whereas the semantic, organisational and legal are more challenging and thus require a firm approach, because technical interoperability alone cannot provide the desired outcomes.

In order for the IEB to be able to tackle all these issues, the number and composition of the working groups to be established to support the work of the IEB as per Art. 15(5) must reflect the width and complexity of the topic. Efforts must also be made to ensure that all relevant parties are involved in the IEC or are otherwise empowered to give input to the work of the IEB.

While it is important to ensure sharing and reusing of interoperability solutions, this must not be done at the expense of security. In addition to excluding interoperability solutions in some sensitive fields from the scope of the information sharing obligation as suggested in Art. 4(1), there must be provisions that ensure that that the developers of the solutions will not have to share such information that would compromise security. For example, there can be no obligation to share the configurations of the servers or other production environments of the solutions as this would give away information that would enable data breach or malicious hacking.

Certain elements of the IEA proposal bear clear resemblance to existing national interoperability governance structures, such as the interoperability platform of Finland[1]. It is indeed important to build on existing work and fully leverage both European and national structures, as well as solutions developed by international organisations, especially in the research sector[2].

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[1] https://dvv.fi/en/interoperability-platform
[2] https://rd-alliance.org/