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Position Paper

Evaluation of the European Interoperability Framework and new interoperability strategy for EU governments

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In CSC's view, the European Interoperability Framework (EIF) has proven to be a useful tool for advancing data sharing in Europe. Interoperability is a key pre-requisite for driving forward a sustainable and well-functioning digital single market, data economy and knowledge-based decision making in Europe. The layered interoperability model of the EIF helps to highlight the different dimensions of interoperability (legal, organisational, semantic, technical) and allows for a comprehensive approach as opposed to the general tendency of considering interoperability only as a technical question. Also, the EIF conceptual model for integrated public services provision is useful for promoting the idea of 'interoperability-by-design' and ultimately the efficiency and user-friendliness of European public services.

It must be kept in mind, however, that the EIF is only a starting point and its real impact on the functioning of European public services and digitalisation depends on how it is applied in practice. Application must be uniform across the different EU Member States, extend to all sectors and take into account all relevant dimensions. Interoperability must be a guiding principle also in terms of applying the EIF across sectors (public-private-research), to enable data sharing and re-use (according to [FAIR principles](#)), for growth and competitiveness.

In order to harmonise interoperability practices across the Union, some EU-level regulation may be necessary. However, it must be noted that recommendations and other soft law instruments often yield better and more durable results, especially if they are developed on the basis of community-driven common practices that most practitioners are already familiar with (eg. <http://www.x-road.global/>). Soft law instruments are also more flexible when it comes to digital services and data, and in this context, we must be careful not to regulate phenomena that are not familiar enough to us yet.

It is also important to take into account any existing national or European legislation when developing European regulation, in order to avoid creating legal barriers for interoperability. Reviewing existing regulation and identifying needs for changing it would also serve the purpose of promoting legal interoperability. The aim must be a combination of a reasonable level of regulation and soft law instruments/community-driven best practices towards an open, federated and interoperable ICT ecosystem. Interoperability with existing data infrastructures must be ensured, and existing infrastructures utilised where possible, to avoid duplicating efforts and building silos.



The different aspects of interoperability must be considered in a holistic way. For example, EIF application in public procurement must be two-fold. On one hand, the procurement systems must be interoperable with one another in order for it to be easier for one provider to participate in tenders in multiple Member States. On the other hand, interoperability requirements must be included in the calls when procuring services or systems that need to be interoperable with their counterparts in other Member States.

Emphasis must be put on identifying and sharing best practices as this alone often incentivises positive developments. For example, EU [Open Source Observatory \(OSOR\) | Joinup](#) has achieved good results by sharing open standards based open source reference implementations among public administrations. While improving the interoperability of digital public services across national borders, attention must also be paid to making these services as user-friendly as possible. Giving the individual the control over data concerning her/himself, according to the [MyData principles](#), is a key element in creative development of user-centric digital services, which would also boost data economy.

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