



Note

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Public consultation on the revision of the European Interoperability Strategy (EIS) and the European Interoperability Framework (EIF): Danish comments

General comments

Denmark recognises the importance of the European Interoperability Strategy (EIS) and the accompanying European Interoperability Framework (EIF). They have been a valuable reference framework for national digitisation activities and the aim of ensuring that basic interoperability considerations are taken into account as an integrated part of the design and development phases of public digital services in the Member States.

Denmark finds the Commission's work on interoperability as valuable and necessary in the light of the overarching political goals in the Commission communication on the Digital Single Market endorsed politically by the Council. In this light, Denmark welcomes the proposed revision of the current Commission communications on the EIS and EIF from 2010 in order to more strongly reflect the new political goals and contextual prerequisites, and creating a stronger linkage to the EU eGovernment Action Plan 2016-2020 (COM(2016) 179 final). In general, Denmark welcomes a better integration of the principles mentioned in the EU eGovernment Action Plan 2016-2020 and the proposed revision of EIS/EIF.

Denmark is in favour of the proposed "Option 2" ("Give guidance on interoperability"). Denmark acknowledges the need to consider different tools within "soft legislative approaches" and acknowledges the possibility of using Commission recommendations within identified and commonly agreed (among Member States) areas of action as a means to guide the Member States.

It is of importance for Denmark, that the EIS/EIF is a basic guiding framework for Member States to consult and in general comply with, without jeopardising each Member State's possibility to consider the use of the framework in the light of specific needs, purposes, economic and organisational considerations, and national prioritisations. Denmark finds it of importance to ensure that the application of the framework is to decrease administrative burden and to enable Member States making the public sector as a whole more efficient and effective, and to realise qualitative and quantitative benefits including cost-savings where possible.

Specific comments

- *Definition of “European public service”*: Denmark acknowledges that an European or a national interoperability framework generally should have a wide coverage. At the same time it should be made clear, that focus on compliance of a specific service with a specific recommendation, *e.g.* multilingualism, first and foremost should be on core public services which have a concrete and well-defined relevance, user need and a sound business case. This is important in order to get a wide acceptance and practical use of the framework.
- *Reuse where possible*: Denmark suggests a general recommendation on “reuse where possible” regarding solutions, components, and information and data. Especially the reuse of data could be more clearly recommended as it holds much potential both in relation to the realisation of a “once-only” principle, greater efficiency and effectiveness and reduction of administrative burdens for businesses, and significant quality improvements of public services. In addition, such a recommendation would also be in compliance with the principles developed for the EU eGovernment Action Plan 2016-2020.
- *Directive on accessibility of public sector bodies’ websites*: Denmark suggests replacing the current communication’s elaborated text on accessibility with a general reference to the coming Directive on accessibility of public sector bodies’ websites and the application of the standard EN 310 549. Further, it should be considered how apps could be included in the context of EIS/EIF.
- *Multilingualism*: Denmark recognises the basic principle of multilingualism, but in practice the demand for multilingualism is limited. Most linguistic demands can be satisfied through an English language option in selected solutions. Therefore, Denmark prefers to have a recommendation which takes into account the demand dimension and the practical needs in each Member State as well as the business demands for a digital open market. It could be considered whether an “on-demand” principle for multilingualism could be considered instead of a general recommendation covering everything. This “on-demand” principle should take into account the business case in relation to public administration and businesses’ gains and burdens in order to secure economic sound priorities in the public sector as well as at the societal level including also growth potentials. A shortlist of most needed and recommended core public services to be supplied in English could be a help to assist Member States in making priorities. It should be voluntary to comply with and not directly as part of the EIF.
- *Security and privacy*: Denmark recognises the need for having a secure digital environment which protects personal or critical data and each citizen’s privacy and businesses’ critical business information according to legal requirements. ICT security and privacy considerations should be taken into account in the design phase of digital solutions as also mentioned in the EU eGovernment

Action Plan 2016-2020.

- *Open data:* Denmark supports a stronger focus on interoperability of data and registers as also mentioned in a number of initiatives in the Digital Single Market communication. In this light, Denmark sees possible recommendations in the area focusing on how better enlarging and deepening the usage of the PSI Directive as a basis for opening-up public sector information and data. Denmark supports the removal of barriers for free data flows and the creation of an infrastructure that makes it easy for interested citizens and businesses to access information and data, taking into account the necessary protection of personal data and privacy subject to current legal requirements.
- *Standards:* Denmark supports further European standardisation efforts in order to ensure that interoperability is based on common European standards. However, Denmark finds it important to ensure that European standardisation does not slowdown the effort to provide interoperable digital solutions in the public sector of Member States, and that recommendations on the choice and use of standards are sufficiently dynamic and flexible that interoperability can be achieved through multilateral means if common European means are not available or usable.