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| **ECON-VII/029** |
| **155th plenary session, 24-25 May 2023** |

**EN**

**OPINION**

**Interoperable Europe Act**

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| THE COMMITTEE OF THE REGIONS* notes that certain aspects of the proposal need to be reinforced and fine-tuned, in particular as regards new tasks for subnational authorities, the resources provided in order for them to be able to swiftly and efficiently implement interoperability solutions, and a balanced governance structure that respects the principle of subsidiarity and the different models of governance in the Member States, and allows local and regional authorities to have a say on the pace and degree of implementing interoperability solutions;
* notes that the development and implementation of common interoperability solutions will entail significant financial and staff costs for local and regional authorities; stresses that this includes the need to develop and invest in new interoperable solutions or to start transforming existing systems. To this end, funding sources such as the Digital Europe programme should help local and regional authorities to cover the associated costs;
* calls on the Interoperable Europe Board to provide specific information on when the mandatory interoperability assessment will take place and what factors may trigger such an assessment, for example in the case of public procurement; also stresses that it should not be mandatory to undertake the interoperability assessment until the relevant guidelines have been adopted by the Interoperable Europe Board;
* reiterates the critical importance of interoperability for the digital resilience and strategic independence of the EU: by having interconnected services and systems, a potential digital pandemic as a result of a major cyber-attack on the weakest spot of the network needs to be prevented by using the same or similar solutions across interconnected entities. At the same time, using open-source solutions will decrease dependency on major suppliers of software solutions, thus increasing the strategic independence of the EU.
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| RapporteurMichele PAIS (IT/ECR)President and member of the Sardinia Regional CouncilReference documentProposal for a Regulation of the European Parliament and of the Council laying down measures for a high level of public sector interoperability across the Union (Interoperable Europe Act)COM(2022) 720 |

**Opinion of the European Committee of the Regions – Interoperable Europe Act**

1. **RECOMMENDATIONS** **FOR AMENDMENTS**

**Amendment 1**

Recital (3)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The new governance structure should have a legal mandate to drive the further development of the European Interoperability Framework and other common interoperability solutions, such as specifications and applications. Furthermore, this Regulation should establish a clear and easily recognizable label for some interoperability solutions. The creation of a vibrant community around open government technology solutions should be fostered. | The new governance structure should ***allow local and regional authorities to have a fair say concerning the pace and degree of implementation in line with the principle of subsidiarity. This would give the governance structure*** a legal mandate to drive the further development of the European Interoperability Framework and other common interoperability solutions, such as specifications and applications. ***The financial implications for local and regional authorities of tasks concerning interoperability implementation should be kept to a minimum.*** Furthermore, this Regulation should establish a clear and easily recognizable label for some interoperability solutions. The creation of a vibrant community around open government technology solutions should be fostered. |

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| **Reason** |
| Local and regional authorities have limited resources in terms of funding, human resources, tools, etc. Therefore, while complying with the principle of subsidiarity, –local and regional authorities should retain a sense of control over the implementation process. They should also receive appropriate funding for additional costs imposed on them by the implementation process. |

**Amendment 2**

Recital 3

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
|  | ***In order to make the process sufficiently democratic and bottom up, citizens of European Member States should have a say concerning priorities of interoperability solutions. To this end, in line with the objective of the Interoperable Europe Act, local and regional authorities may conduct direct consultations with citizens once every two years, in order to survey which interoperability solutions citizens deem to be of priority. The European Commission shall allocate appropriate financial support for local and regional authorities to conduct such dialogues with their citizens. Local and regional authorities shall share the results of the consultations with the Interoperable Europe Board and the Interoperable Europe community.*** |

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| ***Reason*** |
| LRAs are closest to citizens, therefore they can gain the most accurate insight into the priorities and expectations of citizens. To make interoperability a democratic and bottom-up process, sufficient and active involvement of LRAs in the monitoring of citizens' priorities will be crucial. |

**Amendment 3**

Recital (8)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| To set up cross-border interoperable public services, it is important to focus on the interoperability aspect as early as possible in the policymaking process. Therefore, the public organisation that intends to set up a new or to modify an existing network and information system that is likely result in high impacts on the cross-border interoperability, should carry out an interoperability assessment. This assessment is necessary to understand the magnitude of impact of the planned action and to propose measures to reap up the benefits and address potential costs. The interoperability assessment should be mandatory in three cases, which are in scope for cross-border interoperability. In other situations, the public organisations may decide to carry out the interoperability assessment on a voluntary basis. | To set up cross-border interoperable public services, it is important to focus on the interoperability aspect as early as possible in the policymaking process. Therefore, the public organisation that intends to set up a new or to modify an existing network and information system that is likely result in high impacts on the cross-border interoperability, should carry out an interoperability assessment. This assessment is necessary to understand the magnitude of impact of the planned action and to propose measures to reap up the benefits and address potential costs. ***In order to ensure the smooth implementation of the interoperability assessment, the Interoperable Europe Board should publish specific guidelines on which services are covered by the directive.*** The interoperability assessment should be mandatory in three cases, which are in scope for cross-border interoperability. ***In cases where an interoperability assessment is mandatory, training opportunities should be provided, and funding sources such as the Digital Europe Programme shall ensure that the resources for the additional costs incurred are also made available to local and regional authorities. In non-mandatory*** situations, the public organisations may decide to carry out the interoperability assessment on a voluntary basis. |

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| **Reason** |
| Local and regional authorities have limited resources and therefore cannot be expected to cover the costs of mandatory assessments by themselves. To this end, in cases where interoperability assessments are mandatory, the Commission should ensure funding for assessments.  |

**Amendment 4**

Recital 37

|  |  |
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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| In order to ensure uniform conditions for the implementation of this Regulation, implementing powers should be conferred on the Commission to set out rules and the conditions for the establishment and the operation of the regulatory sandboxes. | In order to ensure uniform conditions for the implementation of this Regulation, implementing powers should be conferred on the Commission to set out rules and the conditions for the establishment and the operation of the regulatory sandboxes ***in cooperation with relevant public sector bodies including local and regional authorities***. |

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| ***Reason*** |
| Since regulatory sandboxes shall be operated under the responsibility of the participating public sector bodies, it would be one sided for the European Commission to establish operational conditions alone, without consulting with other relevant entities. |

**Amendment 5**

Article 3(3)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The national competent authorities and the interoperability coordinators shall provide the necessary support to carry out the interoperability assessment. The Commission may provide technical tools to support the assessment. | The national competent authorities and the interoperability coordinators shall provide the necessary support to carry out the interoperability assessment. The Commission may provide technical tools to support the assessment. ***The national competent authorities and the Interoperable Europe Board shall provide support in pre-assessing whether the intended operation falls within the scope of this Regulation, before the interoperability assessment becomes mandatory.*** |

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| **Reason** |
| The scope of the Regulation is broad and for smaller public sector bodies or municipalities it may be too complicated to assess whether the intended operation has a cross-border element. |

**Amendment 6**

Article 3(5)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
|  | ***(5) a) (new) When carrying out an interoperability assessment, the public sector body, or institution, body or agency of the Union concerned, shall refrain from using the expertise of their supplier of current services or employees thereof in order to prevent a potential conflict of interests. This consultation is without prejudice to the protection of commercial or public interests or the security of such systems.*** |

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| ***Reason*** |
| In order to avoid "vendor lock-in", the public sector bodies concerned should use the expertise of persons independent from suppliers of current systems and/or networks as their assessments might be biased in favour of existing solutions. |

**Amendment 7**

Article 9(2)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The policy implementation support project shall set out: 1. the existing Interoperable Europe solutions deemed necessary for the digital implementation of the policy requirements;
2. any missing interoperability solutions to be developed, deemed necessary for the digital implementation of the policy requirements;
3. other recommended support measures, such as trainings or peer-reviews;
 | The policy implementation support project shall set out:1. the existing Interoperable Europe solutions deemed necessary for the digital implementation of the policy requirements;
2. any missing interoperability solutions to be developed, deemed necessary for the digital implementation of the policy requirements;
3. other recommended support measures, such as trainings or peer-reviews;
4. ***financial support opportunities to assist the implementation of interoperability solutions.***
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| **Reason** |
| Financial support will be inevitable for the implementation of interoperability. To this end, it should be a specific aspect of the policy implementation support as well. |

**Amendment 8**

Article 11(2)

|  |  |
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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| Regulatory sandboxes shall be operated under the responsibility of the participating public sector bodies and, where the sandbox entails the processing of personal data by public sector bodies, under the supervision of other relevant national authorities, (…) | Regulatory sandboxes shall be operated under the responsibility of the participating public sector bodies and, where the sandbox entails the processing of personal data by public sector bodies, under the supervision of other relevant national ***or sub-national*** authorities, (…) |

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| **Reason** |
| Regulatory sandboxes can also be operated at local and regional level. Local and regional administrations play a key role in implementing interoperability solutions close to the citizen and provide a wide range of services at local level. |

**Amendment 9**

Article 12(1)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The participating public sector bodies shall ensure that, to the extent the innovative interoperability solution involves the processing of personal data or otherwise falls under the supervisory remit of other national authorities providing or supporting access to data, the national data protection authorities and those other national authorities are associated to the operation of the regulatory sandbox. (…) | The participating public sector bodies shall ensure that, to the extent the innovative interoperability solution involves the processing of personal data or otherwise falls under the supervisory remit of other national ***or sub-national*** authorities providing or supporting access to data, the national ***or sub-national*** data protection authorities and those other national ***or sub-national*** authorities are associated to the operation of the regulatory sandbox. (…) |

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| **Reason** |
| Regulatory sandboxes can also be operated at local and regional level. Local and regional administrations play a key role in implementing interoperability solutions close to the citizen and provide a wide range of services at local level. |

**Amendment 10**

Article 13(2)

|  |  |
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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The Commission shall organise training courses on interoperability issues at Union level to enhance cooperation and the exchange of best practices between the staff of public sector bodies, institutions, bodies and agencies of the Union. The courses shall be announced on the Interoperable Europe portal. | The Commission shall organise training courses on interoperability issues at Union level to enhance cooperation and the exchange of best practices between the staff of public sector bodies, institutions, bodies and agencies of the Union. The courses ***targeted at decision-makers and/or practitioners*** shall be announced on the Interoperable Europe portal ***and may comprise online information sessions, video tutorials and workshops, train-the-trainers materials and guidelines for on-the-job learning***. |

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| ***Reason*** |
| When consulted, the CoR RegHub network has shown that training on interoperability is a key priority. In addition to practitioners and ICT experts, it is important to target senior management and to align middle managers as culture change may be required. |

**Amendment 11**

Article 15(4)(r)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| Inform regularly and coordinate with the interoperability coordinators and the Interoperable Europe Community on matters concerning cross-border interoperability of network and information systems. | Inform regularly and coordinate with the interoperability coordinators and the Interoperable Europe Community on matters concerning cross-border interoperability of network and information systems ***and on relevant EU-funded projects and networks.*** |

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| ***Reason*** |
| Other EU-funded projects of relevance, such as H2020 AURORAL, or city networks for digital transformation, such as Living-in.EU, should be presented by the Board, and synergies should be sought at strategic and operational levels. |

**Amendment 12**

Article 16(4)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
|  | ***(d) new******support public sector bodies, institutions, agencies or bodies of the Union in carrying out interoperability assessments.***  |

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| **Reason** |
| This recommendation fits with a suggestion to pool experts from all EU Member States to support interoperability assessments. Contrary to peer reviews pursuant to Article 14, experts do not necessarily need to be drawn from Member States other than the Member States where the public body undergoing the peer review - relating to an interoperability assessment - is located. |

**Amendment 13**

Article 17(2)(f)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| coordinate and encourage the active involvement of a diverse range of national entities in the Interoperable Europe Community (…) | coordinate and encourage the active involvement of a diverse range of national entities***, including local and regional authorities,*** in the Interoperable Europe Community (…) |

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| **Reason** |
| Local and regional administrations play a key role in implementing interoperability solutions close to the citizen and provide a wide range of services at local level. |

**Amendment 14**

Article 17(3)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| The Member States shall ensure that the competent authority has adequate competencies ***and resources*** to carry out, in an effective and efficient manner, the tasks assigned to it. | The Member States shall ensure that the competent authority has adequate competencies to carry out, in an effective and efficient manner, the tasks assigned to it. ***The Commission shall ensure that competent authorities of Member States receive appropriate funding to support the performance of related tasks.*** |

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| **Reason** |
| Since appointed competent authorities will be assigned additional tasks relating to interoperability, the Commission must ensure that any financial implications of relevant tasks, including the potential need to hire additional personnel, are not exclusively borne by the appointed competent authorities. |

**Amendment 15**

Article 19(2)(d)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| identification of synergies with other relevant Union ***and*** national programmes and initiatives. | identification of synergies with other relevant Union, national, ***regional and local*** programmes and initiatives. |

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| ***Reason*** |
| Regional and local administrations play a key role in implementing interoperability solutions close to the citizen and provide a wide range of services at local level. |

**Amendment 16**

Article 21(1)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
| Subject to the availability of funding, the general budget of the Union shall cover ***the costs of***: (a) the development and maintenance of the Interoperable Europe portal; (b) the development, maintenance and promotion of Interoperable Europe solutions; (c) the Interoperable Europe support measures***.*** | Subject to the availability of funding, the general budget of the Union shall cover:(a) ***the costs of*** the development and maintenance of the Interoperable Europe portal;(b) ***the costs of*** the development, maintenance and promotion of Interoperable Europe solutions;(c) ***the costs of*** the Interoperable Europe support measures;***(d) the costs of mandatory interoperability assessments for local and regional authorities.******(e) citizen consultations conducted by local and regional authorities concerning interoperability priorities.*** |

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| **Reason** |
| Local and regional authorities have limited resources and cannot be expected to cover the whole cost of mandatory assessments by themselves. To this end, in cases where interoperability assessments are mandatory, the Commission should ensure funding for assessments. In line with Amendment 12, local and regional authorities are closest to citizens, thus, they can gain the most accurate insight into the priorities and expectations of citizens regarding interoperability solutions to be developed. Sufficient and active involvement of local and regional authorities in the monitoring of citizens' priorities will be crucial, for which sufficient funding will be essential. |

**Amendment 17**

Article 21(1)

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| ***Text proposed by the European Commission*** | ***CoR Amendment*** |
|  | ***(e) the additional costs incurred by the competent authorities as a result of their work on interoperability.*** |

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| **Reason** |
| Since the appointed competent authorities will be assigned additional tasks relating to interoperability, the Commission must ensure that any financial implications of relevant tasks, including the potential need to hire additional personnel are not exclusively borne by the appointed competent authorities. |

1. **POLICY RECOMMENDATIONS**

THE EUROPEAN COMMITTEE OF THE REGIONS

# notes the legislative proposal as it strives to set up a system of EU-wide interoperability governance, striking the right balance between the top-down approach in defining a procedure to set general recommendations for interoperability solutions at EU level and in taking into consideration input from local and regional authorities given that are closest to the citizens when it comes to the implementation of EU legislation;

# notes, however, that certain aspects of the proposal need to be reinforced and fine-tuned, in particular as regards new tasks for subnational authorities, the resources provided in order for them to be able to swiftly and efficiently implement interoperability solutions, and a balanced governance structure that respects the principle of subsidiarity and the different models of governance in the Member States, and allows local and regional authorities to have a say on the pace and degree of implementing interoperability solutions;

# recommends taking into account any existing national interoperability systems (general or sector-specific) that started prior to this regulatory framework, as they could conflict with the newly introduced rules. This could create misalignment and require the use of massive resources – human and financial – for implementation;

# underlines the key role of local and regional authorities in providing services to citizens and the fact that these services should be digitalised by 2030, in line with the EU Digital Decade provisions and the subsidiarity and proportionality principles; in particular, the protection of personal data must be ensured at all times and by all bodies involved;

# points out that these services typically cover sectors such as mobility, energy, population, health, agriculture and others; and points at the interlinkages with the use of data in those sectors and relevant EU legislation such as the EU Data Act, the Data Governance Act and the GDPR regulation[[1]](#footnote-1);

# acknowledges that with additional financial support provided, and training for staff in authorities, interoperability has the potential to substantially improve the efficiency of public administration at local and regional level. Local and regional administrations should ensure, within the framework of the subsidiarity and proportionality principles, that their systems are interoperable with those of other local authorities, regional authorities, nationally, as well as those of other EU countries and those of collaborating companies and suppliers; in the context of this EU legislative proposal, a key concern is cross-border interoperability;

# recognises that many local and regional administrations face financial and human resource constraints in the current economic context, and that the digital transformation must nonetheless be considered a priority; highlights that, without financial support, these changes may jeopardise economic and social opportunities in the future and may pose a real risk to digital cohesion overall; calls on the European institutions to support the digital transition with adequate financial resources, including for smaller, and/or disadvantaged regions and islands;

# highlights that a survey among the RegHub network of local and regional administrations[[2]](#footnote-2) has shown that key challenges of achieving interoperability at local level include the following: respecting relevant legal requirements; complying with technical requirements to integrate data with often complex data specifications; existing non-interoperability of various systems at the national level; lack of data that is available on a permanent basis; diversity of sources and types of consumption; in addition, there is a need to make organisations less bureaucratic and change organisational cultures in line with the interoperability of technical systems (organisational interoperability);

# notes the work of the European Commission in drawing up this proposal, as well as its inclusive approach taking into account recommendations of the Expert Group on interoperability of public services[[3]](#footnote-3), a recent opinion of the Fit 4 Future platform on the "Governments Interoperability Strategy"[[4]](#footnote-4) and input from a number of stakeholders and early adopters who put innovative solutions into practice at a very early stage;

# reiterates the need to ensure that coherent solutions are introduced by ensuring retrospective compatibility of new systems with the legacy ones[[5]](#footnote-5);

# praises the use of free and Open-Source solutions that will be an undoubted advantage for local authorities and European citizens as a crucial means of achieving the intended sharing and re-use of interoperability solutions and thus of improving cross-border interoperability, as referred to in Article 4(1);

# notes that the development and implementation of common interoperability solutions will entail significant financial and staff costs for local and regional authorities; stresses that this includes the need to develop and invest in new interoperable solutions or to start transforming existing systems. To this end, funding sources such as the Digital Europe programme should help local and regional authorities to cover the associated costs;

# stresses that the use of free and open-source software is a key and necessary method of avoiding vendor lock-in, and of ensuring that the potential sharing and re-use of non-open interoperability solutions does not give right holders unfair competitive advantages (see Article 4(2));

# calls on the Interoperable Europe Board to provide specific information on when the mandatory interoperability assessment will take place and what factors may trigger such an assessment, for example in the case of public procurement; also stresses that it should not be mandatory to undertake the interoperability assessment until the relevant guidelines have been adopted by the Interoperable Europe Board:

# suggests developing frameworks and guidance on appropriate licensing and use of open-source and copyrighted interoperability solutions to support public authorities' purchasing and procurement of such solutions;

# notes that interoperability governance is fragmented, especially in decentralised countries, as a result of the voluntary nature of the European Interoperability Framework; underlines the key role of national competent authorities and "early-adopting" local and regional authorities in awareness-raising and in fostering digital transformation in their peer cities and regions;

# reiterates the need to bridge digital and territorial divides; the Digital Compass[[6]](#footnote-6) target of 100% key public services to be provided online by 2030 is helping achieve this aim; stresses that providing public service interoperability digitally and/or online is of utmost importance for all regions and municipalities in the EU, regardless of their geographical location, including peripheral regions, remote islands and mountainous areas. Technology can ensure that regions and municipalities can overcome the disadvantages of their peripheral location; highlights the need for concrete and effective collaboration with insular and peripheral regions in the governance of the interoperable transition;

# welcomes the activities of proactive cities and regions that are seeking solutions and sharing best practices, working as early adopters and testing new practices; praises the work of the living-in.eu[[7]](#footnote-7) movement, bringing together cities and communities in fostering digital transformation, or Open and Agile Smart Cities, that have been developing Minimum Interoperability Mechanisms as universal tools for achieving interoperability of data, systems, and services between cities and suppliers around the world; underlines that in order to achieve a more homogenous interoperability environment and widely used interoperability solutions, an EU-wide governance system needs to be set up;

# notes that procurement and tendering of new systems or upgrading existing ones will be burdensome for local and regional authorities, in particular due to lack of expertise, finances and personnel;

# reiterates the critical importance of interoperability for the digital resilience and strategic independence of the EU: by having interconnected services and systems, a potential digital pandemic as a result of a major cyber-attack on the weakest spot of the network needs to be prevented by using the same or similar solutions across interconnected entities. At the same time, using open-source solutions will decrease dependency on major suppliers of software solutions, thus increasing the strategic independence of the EU;

# recognises the concerns of cities, smaller municipalities and regions over the new tasks conferred by the proposed regulation and underlines the absolute need to take their specific interests into account; stresses the need for CoR representatives to be an integral part of the strategic layer of the interoperability governance; intends, through its participation in the Interoperable Europe Board, to ensure that local and regional concerns are taken on board;

# stresses that it is important for local and regional authorities to obtain specific guidelines from the Interoperable Europe Board and the competent national authorities concerning which services are covered by the interoperability assessment; stresses that a pre-screening of cross-border applicability ahead of any interoperability assessment should be defined and the national competent authorities should be in charge of this;

# welcomes the emphasis the proposal places on open-source solutions and also on the participation of open-source developers in the Interoperable Europe community. Having open-source as key part of service solutions at local/regional administration level will enhance transparency, reduce costs, foster cybersecurity and avoid vendor lock-in situations whereby some data that has already been collected may not be available when changing suppliers of services;

# suggests that the Interoperable Europe portal – or a portal with similar features – serve as a repository of all public services provided online in the EU Member States, clustered by type of service and Member State. The portal may then become a starting point for any citizen looking for information on how to access these public services online. This would be an effective way to pool information on key public services to be provided online by 2030;

# lastly, notes that the proposal complies with the principles of subsidiarity and proportionality.

Brussels, 24 May 2023

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| The Presidentof the European Committee of the RegionsVasco Alves Cordeiro |  |
|  | The Secretary-Generalof the European Committee of the RegionsPetr Blížkovský |

1. **PROCEDURE**

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| **Title** | Interoperable Europe Act |
| **Reference(s)**  | Proposal for a Regulation of the European Parliament and of the Council laying down measures for a high level of public sector interoperability across the Union (Interoperable Europe Act) – COM(2022) 720 |
| **Legal basis** | Article 307 TFEU |
| **Procedural basis** | Rule 41(b)(i) RoP |
| **Date of Council/EP referral/Date of Commission letter** | COM(2022) 720 final* European Commission: 18 November 2022
* Council of the EU: 25 November 2022
* European Parliament: 30 November 2022
 |
| **Date of Bureau/President's decision** | 2 December 2022 |
| **Commission responsible** | Commission for Economic Policy |
| **Rapporteur** | Michele País (IT/ECR) |
| **Analysis** | 8 March 2023 |
| **Discussed in commission**  | 19 April 2023 |
| **Date adopted by commission**  | 19 April 2023  |
| **Result of the vote in commission** | unanimity |
| **Date adopted in plenary**  | 24 May 2023  |
| **Previous Committee Fit opinions**  | * The Digital Services Act and the Digital Markets Act[[8]](#footnote-8)
* European Digital Identity[[9]](#footnote-9)
* A strategy for Europe's digital future and a strategy for data[[10]](#footnote-10)
* European Data Act[[11]](#footnote-11)
 |
| **Date of subsidiarity monitoring consultation** | 2 March 2023 |

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1. Opinion 1959/2022 on the European Data Act, Rapporteur Anne Karjalainen (FI/PES), adopted on 30/6/2022, see [Opinion Factsheet (europa.eu)](https://cor.europa.eu/EN/our-work/Pages/OpinionTimeline.aspx?opId=CDR-1959-2022). [↑](#footnote-ref-1)
2. [Network of Regional Hubs (europa.eu)](https://cor.europa.eu/en/our-work/Pages/network-of-regional-hubs.aspx#3). [↑](#footnote-ref-2)
3. [Official expert recommendations for a new Interoperability Policy | Joinup (europa.eu)](https://joinup.ec.europa.eu/interoperable-europe/news/official-expert-recommendations-new-interoperability-policy). [↑](#footnote-ref-3)
4. [Final opinion 2022\_SBGR3\_10 Governments interoperability strategy\_rev.pdf (europa.eu)](https://commission.europa.eu/system/files/2022-12/Final%20opinion%202022_SBGR3_10%20Governments%20interoperability%20strategy_rev.pdf). [↑](#footnote-ref-4)
5. This is also in line with a recommendation put forward by the Fit 4 Future opinion, which suggested that organizational and semantic interoperability layers be improved to reflect the time dimension of data (this concerns the compatibility of old and new versions of IT solutions). [↑](#footnote-ref-5)
6. <https://digital-strategy.ec.europa.eu/en/policies/europes-digital-decade>. [↑](#footnote-ref-6)
7. <https://living-in.eu/>. [↑](#footnote-ref-7)
8. [OJ C 440, 29.10.2021, p. 67](https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2021:440:SOM:EN:HTML). [↑](#footnote-ref-8)
9. [OJ C 61, 4.2.2022, p. 42](https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2022:061:SOM:EN:HTML). [↑](#footnote-ref-9)
10. [OJ C 440, 18.12.2020, p. 71](https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2020:440:SOM:EN:HTML). [↑](#footnote-ref-10)
11. [OJ C 375, 30.9.2022, p. 112](https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2022:375:SOM:EN:HTML). [↑](#footnote-ref-11)