EUROPEAN UNION

Committee of the Regions

EDUC-V-045

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OPINION

Interoperability as a Means for Modernising the Public Sector

THE EUROPEAN COMMITTEE OF THE REGIONS points out:

– The benefits and opportunities provided by the comprehensive use of Information and Communication Technologies (ICTs) for making the public sector more efficient and transparent.

– The importance of accessibility of public institutions to private individuals and businesses via electronic means, irrespective of the physical location of the addressing person and therefore emphasises its support for the development of cross-border public services, especially those covering aspects of interoperability and e-identification, e-signatures, electronic service of documents and other building blocks of e-government.

– The ISA2 Programme's commitment to promote and, where appropriate, support the partial or full standardisation of existing interoperability solutions and to do so in cooperation with other standardisation activities at EU level and in European and other international standardisation organisations.

– That the interoperability of e-government requires not only system compatibility (M2M solutions), but also capacity of civil services to work in close cooperation with information systems, as well as public awareness of the possibilities that such systems offer; the Committee therefore suggests adding human capacity-building, both in terms of digital and language skills, and awareness-raising components to the ISA2 programme, as suggested in other legislation.

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Rapporteur

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Reference document

Proposal for a Decision of the European Parliament and of the Council establishing a programme on interoperability solutions for European public administrations, businesses and citizens (ISA2) 'Interoperability as a means for modernising the public sector'
COM(2014) 367 final

Opinion of the European Committee of the Regions – Interoperability as a Means for Modernising the Public Sector

I. POLICY RECOMMENDATIONS

THE EUROPEAN COMMITTEE OF THE REGIONS

1. Underlines the benefits and opportunities provided by the comprehensive use of Information and Communication Technologies (ICTs) for making the public sector more efficient and transparent;

2. Notes the importance of accessibility of public institutions to private individuals and businesses via electronic means, irrespective of the physical location of the addressing person and therefore emphasises its support for the development of cross-border public services, especially those covering aspects of interoperability and e-identification, e-signatures, electronic service of documents and other building blocks of e-government[1];

3. Underlines the importance of interoperability between the public administrations of the different Member States and those of the European Union as a part of general modernisation of public administrations across the EU, as well as Community bodies, with a view to achieving the goals of the Europe 2020 strategy and of its flagship programme: a Digital Agenda for Europe[2];

4. Notes that the EU has paid significant attention to interoperability programmes since they were first introduced in 1995[3], and that various EU bodies have given a favourable assessment of such activities[4], and calls for this commitment to be maintained and for the process of further modernising public services to continue, promoting good governance and facilitating cross-border and cross-sectoral interaction;

5. Welcomes the conclusions of the European Council of October 24-25 2013, which suggested that the modernisation of public administrations should continue, with particular emphasis on e-services such as e-government, e-health, e-invoicing and e-procurement, and which highlighted the need to ensure interoperability between such services, thus leading to more and better digital services for citizens and businesses across Europe, cost savings and increased efficiency, transparency and quality of service in the public sector;

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[1] See CdR 4165/2014, 5960/2013, 5559/2013, 3597/2013, 1646/2013, 2414/2012, 1673/2013, 626/2012, 402/2012, 65/2011, 104/2010.

[2] *A Digital Agenda for Europe*, Commission Communication, COM(2010) 245 final, 28.8.2010.

[3] The first legal act in this field is considered to be Council Decision 95/468/EC of 6 November 1995 on a Community contribution for telematic interchange of data between administrations in the Community (IDA).

[4] European Parliament Resolution on a competitive digital single market — e-Government as a spearhead (3 April 2012).

6. Wishes to highlight the results of the Annual Growth Surveys published by the Commission in 2011, 2012 and 2013, which show that the quality of European public administrations has a direct impact on the economic environment and is therefore crucial to stimulating productivity, competitiveness and growth and consequently stresses the importance of the timely and comprehensive modernisation of public administrations;

7. Emphasises that over 100 000 local and regional authorities, from all 28 EU Member States, as well as other countries directly affected by EU legislation, are key providers of services to the general public and to businesses, whose voices should be heard and taken into account when drafting any initiatives affecting public service provision;

8. Welcomes the proposal for the Programme on interoperability solutions for European public administrations, businesses and citizens (ISA2), also regarding it as a step towards the completion of the European digital market[5]. The Committee underlines, however, the importance of ensuring it is line with other relevant policy areas such as the European Semester, the Horizon 2020 Programme, the Connecting Europe Facility (CEF), the Digital Agenda for Europe's pillar II on interoperability and standards, the European Interoperability Strategy, the European Interoperability Framework and their future updates, with a view to maximising coherence and synergies;

Towards the interoperability of public administrations in the EU

9. Notes the results of studies indicating that Member State governments still have a long way to go in terms of guaranteeing businesses and private individuals trouble-free access to online public services, even within their own Member State (the indicator currently stands at 72% of all services), while the availability of cross-border public services to nationals of a different EU country amounts to less than half of services (42%)[6];

10. Stresses the importance of the European level in the coordination and provision of good practice guidelines in new areas such as electronic public services and their cross-border interoperability;

11. Highlights the benefits in terms of lower costs, re-usability and flexibility of the end product provided by the use of open standards;

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[5]   Proposal for a decision of the European Parliament and of the Council establishing a programme on interoperability solutions for European public administrations, businesses and citizens (ISA2) Interoperability as a means for modernising the public sector Brussels, 26.6.2014 COM(2014) 367 final 2014/0185 (COD)

[6]   eGovernment Benchmark Framework 2012-2015 Method paper July 2012, Final Report: A study prepared for the European Commission DG Communications Networks, Content & Technology, available at https://ec.europa.eu/digital-agenda/sites/digital-agenda/files/eGovernment%20Benchmarking%20method%20paper%20published%20version_0.pdf

12.   Therefore calls for a drive to ensure the comprehensive cross-sectoral and cross-border interoperability of the EU and Member States' e-services at the national, regional and local levels, allowing all interested countries to join this system, where appropriate;

13.   Welcomes the fact that the draft decision builds on the e-Cohesion initiative, which aims at simplifying and streamlining the implementation of cohesion policy for 2014-2020 through the electronic exchange of information between beneficiaries and relevant bodies;

14.   Shares the cautiousness expressed in the draft decision regarding the fact that a sector-specific interoperability approach entails the risk that the adoption of different or incompatible solutions at national or sectorial levels will create new e-barriers impeding the proper functioning of the internal market, the associated freedoms of movement and market competitiveness;

15.   Welcomes the ISA2 Programme's commitment to promote and, where appropriate, support the partial or full standardisation of existing interoperability solutions and to do so in cooperation with other standardisation activities at EU level and in European and other international standardisation organisations;

16.   Notes that interoperability legislation should extend to private individuals and businesses[7], and therefore calls for the ISA2 programme to be more open to non-governmental sectors;

17.   Draws attention to the high degree of trust placed in cloud computing services[8], but would point out that due to the physical nature of this service, utmost priority should be given to issues of the secure and integral operation of interoperable systems;

18.   Underlines that the interoperability of e-government requires not only system compatibility (M2M solutions), but also capacity of civil services to work in close cooperation with information systems, as well as public awareness of the possibilities that such systems offer; the Committee therefore suggests adding human capacity-building, both in terms of digital and language skills, and awareness-raising components to the ISA2 programme, as suggested in other legislation[9];

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[7]   COM(2014) 367 final 2014/0185 (COD) p. 10.

[8]   See the Communication on 'Unleashing the Potential of Cloud Computing in Europe'. COM(2012) 529.

[9]   Specifically Regulation (EU) No 1303/2013.

Scope

19.   Welcomes the scope of the proposed ISA2 Programme, which will cover all levels of administration: European, local, regional and national, and gives a commitment to take into account their respective needs, as well as those of citizens and enterprises where relevant[10];

20.   Notes that in a series of Ministerial Declarations[11], ministers have called on the Commission to facilitate cooperation among Member States by implementing cross-border and cross-sector interoperability solutions that will make more efficient and secure public services achievable;

21.   Therefore welcomes the provision of unlimited use of developed interoperability solutions by other Union institutions and bodies and by national, regional and local public administrations, thus facilitating cross-border or cross-sector interaction between them[12];

22.   welcomes the opening-up of the ISA2 to the European Economic Area and to candidate countries, as a tool for promoting their integration with the EU; suggests however, while taking into consideration possible interest from other partner states and the potential to disseminate good governance incentives, that ISA2 financing be opened up to other partner states, primarily those involved in the Eastern or Euro-Mediterranean Partnerships;

23.   Nevertheless views as somewhat limited and undefined the provision that national administrations can be supported in their endeavours through specific instruments under the European Structural and Investment Funds (ESIF) and calls for more detailed elaboration on this proposal;

Coordination of progress in ensuring interoperability

24.   Acknowledges the progress in seeking interoperability for European public services made by the introduction of the European Interoperability Strategy (EIS) and the European Interoperability Framework (EIF) and suggests that the Commission report regularly on the level of public service interoperability within different Member states, EEA countries and candidate states, and also provide cross-sectoral analyses, thus highlighting good practices and implementing the open method of coordination in this area;

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[10]   COM(2014) 367 final, point 29.

[11]   See the declarations adopted in Manchester on 24 November 2005, Lisbon on 19 September 2007, Malmö on 18 November 2009 and Granada on 19 April 2010.

[12]   COM(2014) 367 final, Decision point 2.

25.   Calls for current changes in the cross-sectoral and cross-border interoperability of public administrations e-services EU-wide to be included, also at local and regional level, as one of the indicators to be developed in the rolling work programme with a view to measuring the programme's impact;

26.   Taking into account the low response rate from the Member States during the consultations on the ISA2 programme[13], suggests that the Commission endeavour to involve Member States as well as sub-national authorities more closely in reviewing the ISA2 Programme;

27.   Welcomes the reference to multilingualism as one of the key principles of the ISA2 Programme[14] and calls on the Commission to pay adequate attention to the development of multilingual solutions, providing end-users with greater opportunities to use solutions in their native language;

28.   Given the possibilities for misuse of stored and processed data, as well as the social and political implications, suggests explicitly mentioning security of usage as one of the general principles applying to all actions financed under the ISA2 Programme;

29.   Since implementation of the actions under the programmes preceding the ICA2 programme was often hindered by cumbersome public procurement procedures, therefore calls on the Commission to seek out possible improvements in this area, which would also make it possible to uphold the principles of sound financial management and value for money;

30.   Refers to its frequently-stated support for the development of the new common frameworks within the draft decision on ISA2 and calls for a more resource-efficient approach, primarily focussing on updating and expanding current infrastructure rather than creating new ones;

31. States that the proposal complies with the principles of subsidiarity and proportionality but points out that effective involvement of the Member States and their local and regional authorities in the ISA2 programme will be essential in order to fully achieve its aims and guarantee the continuous respect of the subsidiarity principle during the implementation of the programme;

32.   Therefore notes the need for close interaction with all tiers of public administration, especially with the level of governance closest to the citizen and providing the widest range of services - local and regional authorities;

33.   Welcomes the ambition to limit ISA2 intervention to cases of demonstrable European added value and which make a tangible contribution to strengthening and implementing EU policies

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[13]   With 16 out of 28 Member States replying during the consultations held in November 2013, see COM(2014) 367 final 2014/0185 (COD) p. 10.

[14]   COM(2014) 367 final, Art 4.

and legislation, thus achieving considerable synergies through coordination across borders or sectors;

II. RECOMMENDATIONS FOR AMENDMENTS

Amendment 1
Preamble, Recital 19

Text proposed by the Commission	CoR amendment
	(20) Security of usage and data stored in clouds is a further area which needs to be covered by ISA2.

Amendment 2
Preamble, Recital 28

Text proposed by the Commission	CoR amendment
(28) Regulation (EU) No 1303/2013 includes a thematic objective of 'enhancing institutional capacity of public authorities and stakeholders and an efficient public administration'. In this context, the ISA2 Programme should tie in with programmes and initiatives contributing to the modernisation of public administrations like e.g. the DAE, and related networks like e.g. the European Public Administration Network (EUPAN) and seek synergies with them.	(28) Regulation (EU) No 1303/ 2013 includes a thematic objective of 'enhancing institutional capacity of public authorities and stakeholders and an efficient public administration'. In this context, the ISA2 Programme should tie in with programmes and initiatives contributing to the modernisation of public administrations like e.g. the DAE, and related networks like e.g. the European Public Administration Network (EUPAN) ~~and,~~ seek synergies with them **and contribute to human capacity-building in public administrations**.

Reason

Interoperability can only be achieved if the public administrations that are expected to implement it have the capacity to do so, which is currently not always the case.

Amendment 3
Preamble, Recital 29

Text proposed by the Commission	CoR amendment
(29) Interoperability of European public administrations concerns all levels of administration: European, local, regional and national. It is therefore important that solutions take into account their respective needs, as well as	(29) Interoperability of European public administrations concerns all levels of administration: European, local, regional and national. It is therefore important that solutions take into account their respective needs, as well as

those of citizens and enterprises where relevant.	those of citizens and enterprises where relevant. **Local and regional authorities need to be closely involved in the review of ISA2.**

Reason

As local and regional authorities participate in the programme and its implementation, they also need to be involved in the review as their experience might differ from that of other participants.

Amendment 4

Preamble, Recital 30

Text proposed by the Commission	*CoR amendment*
(30) National administrations can be supported in their endeavours through specific instruments under the European Structural and Investment Funds (ESIF). Close cooperation under the ISA2 Programme should maximise the benefits expected from such instruments by ensuring that funded projects are aligned with the Union-wide interoperability frameworks and specifications such as the EIF.	(30) National, regional and local administrations can be supported in their endeavours through specific instruments under the European Structural and Investment Funds (ESIF). Close cooperation under the ISA2 Programme should maximise the benefits expected from such instruments by ensuring that funded projects are aligned with the Union-wide interoperability frameworks and specifications such as the EIF.

Amendment 5

Preamble, Recital 32

Text proposed by the Commission	*CoR amendment*
(32) Consideration should be given to the possibility of using pre-accession funds to facilitate candidate countries' participation in the ISA2 Programme and the adoption and further implementation in those countries of solutions provided under it.	Consideration should be given to the possibility of using pre-accession funds to facilitate candidate countries' participation in the ISA2 Programme and the adoption and further implementation in those countries of solutions provided under it. **In order to encourage countries from the Eastern or Euro-Mediterranean partnerships to adopt European interoperability standards, some ISA^2 funding shall be made available to those countries, should they wish to participate.**

Amendment 6

Article 2

Text proposed by the Commission	*CoR amendment*
For the purposes of this Decision, the following	For the purposes of this Decision, the following

definitions shall apply:

(1) "interoperability" means the ability of disparate and diverse organisations to interact towards mutually beneficial and agreed common goals, involving the sharing of information and knowledge between the organisations, through the business processes they support, by means of the exchange of data between their respective information and communication technology (ICT) systems;

(2) "interoperability solutions" means common frameworks, common services and generic tools facilitating cooperation between disparate and diverse organisations, either autonomously funded and developed by the ISA2 Programme or developed in cooperation with other Union initiatives, based on identified requirements of European public administrations;

(3) acting as a "solution incubator" means the development of, or support for, interoperability solutions during their pilot phase, before they become operational under other Union programmes or initiatives;

(4) acting as a "solution bridge" means the further development of, and support for, fully operational interoperability solutions before their delivery under other Union programmes or initiatives;

(5) "common frameworks" means specifications, standards, methodologies, guidelines, common semantic assets and similar approaches and documents;

(6) "common services" means the organisational and technical capacity to deliver a common outcome to users, including operational systems, applications and digital infrastructures of a generic nature which meet common user requirements across policy or geographical areas, along with their supporting operational governance;

(7) "generic tools" means systems, reference

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definitions shall apply:

(1) "interoperability" means the ability of disparate and diverse organisations to interact towards mutually beneficial and agreed common goals, involving the sharing of information and knowledge between the organisations, through the business processes they support, by means of the exchange of data between their respective information and communication technology (ICT) systems;

(2) "European public administrations" means public administrations at EU, national, regional and local levels;

(2**3**) "interoperability solutions" means common frameworks, common services and generic tools facilitating cooperation between disparate and diverse organisations, either autonomously funded and developed by the ISA2 Programme or developed in cooperation with other Union initiatives, based on identified requirements of European public administrations;

(3**4**) acting as a "solution incubator" means the development of, or support for, interoperability solutions during their pilot phase, before they become operational under other Union programmes or initiatives;

(4**5**) acting as a "solution bridge" means the further development of, and support for, fully operational interoperability solutions before their delivery under other Union programmes or initiatives;

(5**6**) "common frameworks" means specifications, standards, methodologies, guidelines, common semantic assets and similar approaches and documents;

(6**7**) "common services" means the organisational and technical capacity to deliver a common outcome to users, including operational systems, applications and digital infrastructures of a generic nature which meet common user

platforms, shared and collaborative platforms, and generic components which meet common user requirements across policy or geographical areas;

(8) "actions" means projects, solutions already in their operational phase and accompanying measures;

(9) "project" means a time-limited sequence of well-defined tasks addressing identified user needs through a phased approach;

(10) "accompanying measures" means:

– strategic and awareness-raising measures;

– measures in support of the management of the ISA^2 Programme;

– measures in relation to the sharing of experience and the exchange and promotion of good practices;

– measures to promote the re-use of existing interoperability solutions;

– measures aimed at community-building and capability-raising; and

– measures aimed at establishing synergies with initiatives relevant to interoperability in other areas of Union policy;

(11) "European Interoperability Reference Architecture (EIRA)" means an architecture of a generic structure, comprising a set of principles and guidelines applying to the implementation of interoperability solutions in the European Union;

(12) "European Interoperability Cartography (EIC)" means a repository of interoperability solutions for European public administrations provided by Union institutions and Member States, presented in a common format and complying with specific re-usability and interoperability criteria that can be represented on the EIRA.

requirements across policy or geographical areas, along with their supporting operational governance;

(7**8**) "generic tools" means systems, reference platforms, shared and collaborative platforms, and generic components which meet common user requirements across policy or geographical areas;

(8**9**) "actions" means projects, solutions already in their operational phase and accompanying measures;

(9**10**) "project" means a time-limited sequence of well-defined tasks addressing identified user needs through a phased approach;

(10**11**) "accompanying measures" means:

– strategic and awareness-raising measures;

– measures in support of the management of the ISA^2 Programme;

– measures in relation to the sharing of experience and the exchange and promotion of good practices;

– measures to promote the re-use of existing interoperability solutions;

– measures aimed at community-building and capability-raising; and

– measures aimed at establishing synergies with initiatives relevant to interoperability in other areas of Union policy;

(11**12**) "European Interoperability Reference Architecture (EIRA)" means an architecture of a generic structure, comprising a set of principles and guidelines applying to the implementation of interoperability solutions in the European Union;

(12**13**) "European Interoperability Cartography (EIC)" means a repository of interoperability solutions for European public administrations provided by Union institutions and Member States, presented in a common format and complying with specific re-usability and

	interoperability criteria that can be represented on the EIRA.

Amendment 7
Article 3

Text proposed by the Commission	*CoR amendment*
The ISA2 Programme shall support and promote:	The ISA2 Programme shall support and promote:
(a) the assessment, improvement, establishment, industrialisation, operation and re-use of existing cross-border or cross-sector interoperability solutions;	(a) the assessment, improvement, establishment, industrialisation, operation and re-use of existing cross-border or cross-sector interoperability solutions;
(b) the development, establishment, industrialisation, operation and re-use of new cross-border or cross-sector interoperability solutions;	(b) the development, establishment, industrialisation, operation and re-use of new cross-border or cross-sector interoperability solutions;
(c) the assessment of the ICT implications of proposed or adopted Union legislation;	(c) the assessment of the ICT implications of proposed or adopted Union legislation;
(d) the identification of legislation gaps that hamper interoperability between European public administrations;	(d) the identification of legislation gaps that hamper interoperability between European public administrations;
(e) the establishment, maintenance and improvement of the EIRA;	(e) the establishment, maintenance and improvement of the EIRA;
(f) the establishment and maintenance of the EIC as an instrument to facilitate the re-use of existing interoperability solutions and to identify the areas where such solutions are still lacking;	(f) the establishment and maintenance of the EIC as an instrument to facilitate the re-use of existing interoperability solutions and to identify the areas where such solutions are still lacking;
(g) the assessment, update and promotion of existing common specifications and standards and the development, establishment and promotion of new common specifications and standards through the Union's standardisation platforms and in cooperation with European or international standardisation organisations as appropriate; and	(g) the assessment, update and promotion of existing common specifications and standards and the development, establishment and promotion of new common specifications and standards through the Union's standardisation platforms and in cooperation with European or international standardisation organisations as appropriate**, including on data transmission, processing and storage security**; and
(h) the development of mechanisms that will	

measure and quantify the benefits of interoperability solutions.	(h) the development of mechanisms that will measure and quantify the benefits of interoperability solutions.
In addition, the ISA2 Programme may act as a 'solution incubator', piloting new interoperability solutions, and as a 'solution bridge', operating existing interoperability solutions.	In addition, the ISA2 Programme may act as a 'solution incubator', piloting new interoperability solutions, and as a 'solution bridge', operating existing interoperability solutions.

Reason

Data transmission, processing and storage security are highly relevant in the area of interoperability and should be taken into account when developing and promoting new standards.

Amendment 8

Article 11(1)

Text proposed by the Commission	*CoR amendment*
The Commission and the ISA2 Committee shall regularly monitor the implementation and impact of the ISA2 Programme and users' satisfaction with it. They shall also explore synergies with complementary Union programmes.	The Commission and the ISA2 Committee shall regularly monitor the implementation and impact of the ISA2 Programme and users' satisfaction with it. ~~They~~ **National and sub-national authorities shall be asked for feedback on the results of this monitoring. The Commission and the ISA2 Committee** shall also explore synergies with complementary Union programmes.

Reason

It is important to remain in dialogue with national and sub-national authorities involved in the programme.

Amendment 9

Article 11(2)

Text proposed by the Commission	*CoR amendment*
The Commission shall report annually to the ISA2 Committee on the implementation of the Programme.	The Commission shall report annually to the ISA2 Committee**, the European Parliament, Council and European Committee of the Regions** on the implementation of the Programme **and the level of public service interoperability within**

different Member States.

Reason

Information on the implementation of the ISA2 programme should be made widely available. It is also important to look at the level of interoperability within individual Member States, taking into account the interoperability of services provided by regional or local authorities.

Amendment 10
Article 12

Text proposed by the Commission	*CoR amendment*
1. The ISA2 Programme shall be open to participation by the countries of the European Economic Area and the candidate countries in the framework of their respective agreements with the Union.	1. The ISA2 Programme shall be open to participation by the countries of the European Economic Area and the candidate countries in the framework of their respective agreements with the Union.
2. Cooperation with other third countries and international organisations or bodies shall be encouraged, notably in the framework of the Euro-Mediterranean and Eastern Partnerships and with neighbouring countries, in particular those of the Western Balkans and Black Sea regions. Related costs shall not be covered by the ISA2 Programme.	2. Cooperation with other third countries and international organisations or bodies shall be encouraged, notably in the framework of the Euro-Mediterranean and Eastern Partnerships and with neighbouring countries, in particular those of the Western Balkans and Black Sea regions. Related costs ~~shall not~~ **could partially** be covered by the ISA2 Programme.
3. Where appropriate, the Programme shall promote re-use of its solutions by third countries.	3. Where appropriate, the Programme shall promote re-use of its solutions by third countries.

Reason

In order to encourage international cooperation in the area of interoperability, it is necessary foresee the possibility of the programme partially covering the costs.

Brussels, 12 February 2015.

The President
of the European Committee of the Regions

Markku Markkula

The Secretary-General
of the European Committee of the Regions

Jiří Buriánek

III. PROCEDURE

Title	Opinion on Interoperability as a Means for Modernising the Public Sector
Reference	COM(2014) 367 final
Legal basis	Articles 172, 307 TFEU
Procedural basis	Formal consultation (Rule 41 (a))
Date of Council/EP referral	17/07/2014, 10/07/2014
Date of Bureau decision	-
Commission responsible	Commission for Education, Youth, Culture and Research
Rapporteur	Odeta Žerlauskienė (LT/ALDE)
Analysis	10/10/2014
Discussed in commission	21 November 2014
Date adopted by commission	21 November 2014
Result of the vote in commission (majority, unanimity)	Adopted by unanimity
Date adopted in plenary	12 February 2015
Previous Committee opinions	Interoperability Solutions for European Public Administrations (ISA)[15] Internet of Things and Re-use of Public Sector Information[16] Digital Agenda for Europe[17] eGovernment Action plan 2011-2015[18] Horizon 2020 (The Framework Programme for Research and Innovation)[19] Guidelines for Trans-European Telecommunications Networks[20]
Date of subsidiarity monitoring consultation	n.a.

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[15]   CdR 10/2009 fin.

[16]   CdR 247/2009 fin.

[17]   CdR 104/2010 fin.

[18]   CdR 65/2011 fin.

[19]   CdR 402/2011 fin.

[20]   CDR 5559-2013.