



EUROPEAN UMBRELLA ORGANISATION FOR GEOGRAPHIC INFORMATION

25 January 2021

Data Governance Act

To whom it may concern,

Dear Madam, Sir,

EUROGI is a European-wide representation body for organisations involved in the location/geospatial industry and wants to answer to your request for comment on the Data Governance Act (DGA).

We welcome the DGA and its commitment to the release of previously restricted data in order to facilitate innovation, economic growth and increased services for all citizens across Europe. The introduction of a new data governance structure which the Act provides for is both innovative and welcomed.

However, the DGA in its current draft form raises a number of issues that need further review and consideration as they may lead to unfortunate unintended consequences.

The three key issues that raise concerns are set out below.

- 1) **Citizen Trust.** A key pillar for the success of this and other programs to open up data for use is continued trust on how data contributed by citizens (eg census data, tax data, etc) will be used, managed and protected. If this does not happen citizens will become weary of contributing their data and it will lead to a lower belief and trust in digital services generally. The Act, it seems, tries to recognise this by protecting for use by big organisations. This, in our view, will be very difficult to police or implement and introduces a dangerous concept of data being available for some and not for others. If the data is so sensitive that it needs to be protected or access restricted, should it really be released? Once data is released it will be used, trust will erode and industry as well as public bodies will very likely face criticism.
- 2) **Business Trust.** The DGA tries to identify and remove barriers to the release of data which for example has Intellectual Property protection. While we understand the motivation, we think the result may be counter-productive and result in organisations being slow to engage with the public sector. If an organisation believes that its IP, which in all likelihood is its key competitive advantage, will be given away in the future and it is beyond its control to prevent, then the question arises regarding how actively will they engage with public organisations on projects?



- 3) **New Data Innovation Board.** We welcome its introduction but require greater detail of how it will operate, be staffed, budgeted, interact with other bodies, and which specific powers it will have. Our concern is that it could become another layer of costly bureaucracy and/or become excessively influenced by very large companies/organisations.

On a more general level, while EUROGI does not yet have sight of the architecture that the EU Commission has in mind at the Data Governance level, we believe there should be a provision about a better integration of and accessibility to authoritative harmonised European datasets based on the national geoinformation. This is especially lacking in our geospatial information sector.

In summary, we welcome and support the introduction of measures to make more data more available in order to stimulate economic growth, create a more knowledgeable and empowered citizenry, and encourage the process of innovation. However, we have concerns that the DGA as it is currently drafted may well have the opposite impact along with a negative impact on other significant data projects and legislation that is already in place and/or is in process of being developed. Moreover, consideration should be given, at the Data Governance level, of a clear provision for better integration of and accessibility to authoritative national datasets for the whole territory of the EU.

We would be happy to engage in further discussion regarding the issues which we raise in this submission.

Yours sincerely,

Hans Breemersch

President