Public Consultation as part of the Green Data for All impact assessment.

Fields marked with * are mandatory.

Introduction

Public consultation on the initiative 'GreenData4All – updated rules on geospatial environmental data and access to environmental information'

About the consultation
This consultation is part of the impact assessment of the GreenData4All initiative, which aims to increase the availability, accessibility and reusability of data to support environmental policy development and implementation. The initiative seeks to address current challenges hampering effective data sharing and to ensure that environmental data sharing is adapted to the information needs of end users. The GreenData4All initiative also aims to limit burden on data providers and ensure that every push for making data available is substantiated by a clear user need and/or business value chain.

On the supply side, the initiative seeks to simplify the technical specifications for data and data sharing, which are currently set out in the INSPIRE Directive and to align them with the relevant horizontal legislation, such as the Open Data Directive, the High-Value Datasets Regulation, the Data Act, the Data Governance Act and the Interoperable Europe Act. On the demand side, the initiative seeks to refocus and expand the scope of data sharing (e.g. to non-spatial environmental data) to align it with environmental policy needs and in particular priority use-cases, and to provide easy-to-use end-user applications.

This public consultation aims to gather the views of EU citizens and stakeholders on possible options for building a dataspace with a data offering that is adapted to the needs of environmental data users, easily accessible and reusable by all users, less constraining for data producers, while guaranteeing, where needed, data confidentiality and privacy. Replies may be submitted in any EU official language. It takes approximately 20 minutes to fill in the questionnaire. You may interrupt your session at any time and continue answering at a later stage. If you do so, please remember to keep the link to your saved answers as this is the only way to access them. Only questions marked with a red asterisk are mandatory. Once you have submitted your answers online, you will be able to download a copy of the completed questionnaire. Thank you for taking part in this consultation.

About you

*Language of my contribution
　○ Bulgarian

- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ● English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian
- ○ Irish
- ○ Italian
- ○ Latvian
- ○ Lithuanian
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- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

*I am giving my contribution as
- ○ Academic/research institution
- ○ Business association
- ○ Company/business
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union

○ Other

*First name

> Marjana

*Surname

> ZELIC

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*Organisation name

255 character(s) maximum

> EuroGeographics

*Organisation size

- ○ Micro (1 to 9 employees)
- ● Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

> 51080067776-74

*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

○ Afghanistan	○ Djibouti	○ Libya	○ Saint Martin
○ Åland Islands	○ Dominica	○ Liechtenstein	○ Saint Pierre and Miquelon
○ Albania	○ Dominican Republic	○ Lithuania	○ Saint Vincent and the Grenadines

- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria

- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico

- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu

○ Costa Rica	○ Kiribati	○ Qatar	○ Vatican City
○ Côte d'Ivoire	○ Kosovo	○ Réunion	○ Venezuela
○ Croatia	○ Kuwait	○ Romania	○ Vietnam
○ Cuba	○ Kyrgyzstan	○ Russia	○ Wallis and Futuna
○ Curaçao	○ Laos	○ Rwanda	○ Western Sahara
○ Cyprus	○ Latvia	○ Saint Barthélemy	○ Yemen
○ Czechia	○ Lebanon	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Democratic Republic of the Congo	○ Lesotho	○ Saint Kitts and Nevis	○ Zimbabwe
○ Denmark	○ Liberia	○ Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

◉ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the [personal data protection provisions](#)

Introduction: General questions

What is the role of your organisation? Please select all that apply

☐ Producing and making available environmental data

☐ Hosting and providing access to environmental data (that you do not produce)

☐ Using environmental data in your work / activities

☐ None of the above

☑ Other

Please specify

> EuroGeographics is an independent international not-for-profit organisation (AISBL) representing Europe's National Mapping, Cadastral and Land Registration Authorities (hereinafter referred to as "NMCAs"). Our members provide a range of geospatial data, products, services, and expertise that support environmnet monitoring and reporting, and many more government and business decisions. Some of our members are National Contact Points for INSPIRE, and through their national transposition or international framework programmes, expended significant resources in the implementation of the INSPIRE Directive.

For what purpose do you use environmental data? Please select all that apply.

☐ Research and development

☐ Policy making

☐ Planning

☐ Reporting

☐ Business decision making

☐ Environmental, Social and Governance (ESG) Due Diligence

☐ Corporate sustainability reporting

☐ Advocacy

☐ Public awareness and education

☐ None of the above

☑ Other

Please specify

> We provide reference data as the foundation for all environmental purposes such as analysis, planing, reporting, research, etc. Maps, high value datasets and other geospatial products and services are critical components for these actions providing an accurate continuous observation of the territory.

What types of environmental data do you most frequently use? Please check all that apply.

- ☐ Climate and weather data
- ☐ Air quality data
- ☐ Water quality and quantity data
- ☑ Soil quality data
- ☐ Industrial emissions data
- ☑ Land use/land cover data
- ☐ Biodiversity data
- ☐ Circular economy and waste management data
- ☐ Energy consumption and production data
- ☐ Marine and coastal data
- ☑ Agricultural data
- ☑ Forestry data
- ☑ Hydrology data
- ☐ Noise pollution data
- ☐ None of the above
- ☐ Other

How do you usually access environmental data?

- ○ Viewing services (e.g., online maps or visualisation platforms)
- ◉ Downloading processed data files (e.g., from government or research portals)
- ○ Using raw data for analysis in your own tools or systems (e.g., APIs, cloud platforms)
- ○ Through mobile applications (e.g., weather or air quality apps)
- ○ Other

What are the main benefits of making public environmental data more accessible? Please check all that apply.

- ☑ Innovation, scientific research and technological development
- ☑ Monitoring of environmental impacts
- ☑ Reporting of policy implementation
- ☑ Transparency and information for civil society
- ☐ Development of new business models and economic opportunities
- ☐ Business competitiveness

☐ None of the above

☐ Other

PART A: Better availability and accessibility of green data

For the purpose of the impact assessment of the GreenData4All initiative environmental data is classified in several key types:

Reference Data

Think of reference data as the foundation for all environmental analysis. It includes things like maps, country codes, and chemical registers. This data provides a consistent framework for comparing information across different areas and topics.

Monitoring Data

Monitoring data is all about tracking changes (continuous or periodic) in the environment over time. It includes measurements of air and water quality, weather patterns, and animal populations. This data helps us spot trends and respond quickly to environmental issues.

Thematic/Domain Data

This type of data focuses on specific environmental topics. It might include information about land use, biodiversity, or waste management. Thematic data helps us dive deep into particular environmental issues.

Analytical Data

Analytical data is the result of processing and combining other types of data. It includes predictive models and policy impact analyses. This data helps us understand complex environmental systems and make informed decisions.

Problem definition and specific objectives

In your view, how important is it to make environmental data available to authorities/administrations, citizens and organisations (NGOs, research institutions, businesses etc.)?

- ◉ Very important
- ○ Moderately important
- ○ Neutral
- ○ Slightly important
- ○ Not at all important
- ○ Do not know

Do you believe that current environmental data offerings meet your information needs?

- ○ Strongly agree
- ○ Agree
- ◉ Neutral
- ○ Disagree

○ Strongly disagree

○ Do not know

Do the following issues prevent the reuse of non-personal environmental data?

	Strongly prevents	Moderately prevents	Neutral	Slightly prevents	Does not prevent at all
Limited accessibility of monitoring data (e.g. air quality data)	○	○	●	○	○
Limited accessibility of reference data (e.g. data on protected sites)	○	○	●	○	○
Limited accessibility of analytical data (e.g. data on the health impacts of environmental factors)	○	○	●	○	○
Real-time data is lacking, or datasets are not updated at regular intervals	○	○	●	○	○
Available datasets are incomplete or have significant gaps in geographical or social coverage	○	○	●	○	○
Data sources are fragmented across many data producers making it difficult to find comprehensive data	○	○	●	○	○
Datasets shared by different data producers have different formats, structures, and standards and cannot be easily integrated	○	○	●	○	○
Data is provided in ways not suitable for direct reuse	○	○	●	○	○
Data is provided in ways that require too much digital and expert skills to turn it into actionable information	○	○	●	○	○
Confidentiality or intellectual property rights constraints	○	○	●	○	○
End user applications are not sufficiently available	○	○	●	○	○
Other - please specify below	○	○	○	○	○

In your opinion, which environmental data should be prioritised for improving accessibility and reusability? Please check all that apply.

- ☐ Climate and weather data
- ☐ Air quality data
- ☐ Water quality and quantity data
- ☐ Soil quality data
- ☐ Industrial emissions data
- ☐ Land use/land cover data
- ☐ Biodiversity data
- ☐ Circular economy and waste management data
- ☐ Energy consumption and production data
- ☐ Marine and coastal data
- ☐ Agricultural data
- ☐ Forestry data
- ☐ Hydrology data
- ☐ Noise pollution data
- ☑ None of the above
- ☐ Other

Policy measures, options and impacts

How beneficial do you think it would be that all types of environmental data (reference data, monitoring data, thematic/domain data, analytical data) are shared through a common portal or data marketplace?

- ○ Very beneficial
- ● Somewhat beneficial
- ○ Neutral
- ○ Somewhat detrimental
- ○ Very detrimental
- ○ Do not know

What incentives would encourage you or your organization to share more environmental data?

	Extremely important	Very important	Neutral	Slightly important	Not important
Financial incentives or funding opportunities	●	○	○	○	○
Recognition and visibility in publications and platforms	○	●	○	○	○

Improved data infrastructure and easy sharing tools	○	○	◉	○	○
Access to reciprocal data from other organizations	○	○	◉	○	○
Reduction of administrative burden associated with data sharing	○	○	◉	○	○
Support in verifying and validating data quality, enhancing the credibility and usability of shared information	○	○	◉	○	○

How beneficial do you think it would be to extend the scope of a common portal or data marketplace beyond public sector data to include publicly funded research data, non-open environmental data and citizen-generated environmental data?

- ○ Very beneficial
- ◉ Somewhat beneficial
- ○ Neutral
- ○ Somewhat detrimental
- ○ Very detrimental
- ○ Do not know

In your view, how important are the following services to improve data reuse?

	Extremely important	Very important	Neutral	Slightly important	Not important
A centralized data platform to integrate and consolidate environmental data from various sources	○	○	◉	○	○
Data visualisation tools	○	○	◉	○	○
Data integration services that combine multiple data sources into a unified view	○	○	◉	○	○
Real-time data access	○	○	◉	○	○
Secure data exchange to protect confidentiality and privacy	○	○	◉	○	○
User feedback mechanisms to capture evolving information needs and use cases	◉	○	○	○	○

Do you wish to respond to the second part of the questionnaire, which focuses on the revision and simplification of the current INSPIRE Directive, technical requirements and governance structure?

- ◉ Yes
- ○ No

PART B: Revision and simplification of the current INSPIRE Directive Specific questions (respondents with knowledge of current data governance system)

The INSPIRE Directive creates an EU Spatial Data Infrastructure (SDI) for the purposes of EU environmental policies and policies or activities, which may have an impact on the environment. This SDI enables the sharing of environmental spatial information among public sector organisations, facilitates public access to spatial information across Europe and assists in policy-making across boundaries. The Directive addresses 34 spatial data themes needed for environmental applications.

The Open Data Directive provides common rules for a European market of government-held data, based on transparency and fair competition. It introduces the concept of High Value Datasets (HDVs), which should be made available to the public free of charge, in machine-readable format, via APIs, and, where relevant, as a bulk download, given their high value for society and the economy. The HVDs include environmental and spatial data among others.

Policy measures, options and impacts

In your view, would a potential alignment of INSPIRE with the Open Data Directive contribute to…

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know
To simplify data sharing rules?	○	○	○	○	○	◉
To promote wide accessibility and reuse of geospatial data?	○	○	○	○	○	◉
To reduce the administrative burden on public data providers?	○	○	○	○	○	◉

Please explain your answer

> Some high value datasets regulated by Open data Directive are also INSPIRE data themes. But it has to be noted that initially these two directives had different scopes, a completely different aspects. INSPIRE focuses primarily on data sharing between administrations i.e. between all level of public authorirties unlike the Open data and re-use of PSI Directive which regulates the further use (re-use) of data in the single market. Our members view is that there is no clear argument why it is needed now and what the full alignment would mean in the practice. More in-depth analyses and possible solutions need to be presented by policy maker before creating the members' national position on this question. But the highest possible level of coherence of these 2 Directives is needed. They should not contradict each other.

Do you support the establishment of a common governance structure for data sharing that would integrate INSPIRE governance with governance structures under horizontal legislation such as the Open Data Directive or the Interoperable Europe Act?

○ Strongly support
○ Support
○ Neutral
○ Oppose
○ Strongly oppose
◉ Do not know

In your opinion, how beneficial would it be to involve data intermediaries in the creation of harmonised High-Value Datasets based on the data shared by public sector bodies?

○ Very beneficial
○ Somewhat beneficial
○ Neutral
◉ Somewhat detrimental
○ Very detrimental
○ Do not know

Please explain your answer.

Harmonising high value datasets shared by national public sector bodies is in their interest and must therefore be undertaken by them or by the association or similar expert body/consortium established by them. This is because it is a delicate, sector specific process and in case of doubt, only they can assess and explain the details and the origins of the discrepancy. A data intermediary might not be competent at this point nor does it possess the in-depth knowledge necessary to make decisions. Our position is that intermediation services between data holders and potential data users should not include the creation of harmonised HVD. Without NMCAs experts, a harmonisation of HVD from geospatial theme would not be a succes story. EuroGeographics has long term experience in creating pan european geospatial datasets. The latest Open Maps For Europe 2 (OME2) project coordinated by EuroGeographics is developing a production process and high-value, large-scale pan-European prototype. The OME2 Project shows that EuroGeographics and its members can also deliver authoritative large-scale pan-European data that is harmonised and edge-matched. This proves that the integration of authoritative national geospatial data is the foundation for future pan-European high-value datasets.

If INSPIRE would be fully aligned with horizontal legislation (Open Data Directive, Data Governance Act, Interoperable Europe Act) regarding governance structures, provisions on data sharing and technical requirements (e.g. minimal harmonisation and interoperability requirements), how valuable do you think it would be to keep INSPIRE as a stand-alone instrument?

- ◉ Highly valuable
- ○ Somewhat valuable
- ○ Neutral
- ○ Slightly valuable
- ○ Not valuable
- ○ Do not know

Please explain your answer.

The geodata infrastructure built over the past two decades, with its many useful application scenarios, should be continued in an optimized manner. Therefore, it would be important to streamline the INSPIRE Directive, consistently reduce bureaucratic requirements, describe solution- and practice-oriented processes, and, above all, incorporate NMCAs' practical experience and respect the investment in the implementation of INSPIRE.

Currently, there is no dependable policy framework ('home') for geospatial within the Union. The management of the geospatial sector is fragmented and scattered across various directives including INSPIRE, Open Data and PSI re-use Directive, Implementing Act on HVD, and some other sectorial vertical rules. Therefore the MEP from the ITRE Parliament committee have propsed a pilot project 'A comprehensive policy framework for core geospatial data in the EU' (PP105). The project proposal has been accepted, the budget allocated, and will be launched mid this year. The outcome of this project might support the answer to this question.

CONCLUSION: Additional comments

If you have any further comments on the GreenData4All initiative, please provide them below.

Please upload a document if you wish to share a more extensive contribution or any background materials that will help us to understand your answers.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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