EuroGeographics' feedback on

"A European Data Union Strategy" Call for Evidence

About EuroGeographics

EuroGeographics is an independent international not-for-profit organisation representing Europe's National Mapping, Cadastral and Land Registration Authorities. We believe in a society empowered by the use of trusted geospatial services from these official national sources.

EuroGeographics supports the public good by representing our members' interests, maintaining networks that help our members improve their capabilities and role, and by facilitating access to and use of our members' geospatial data and services. By providing a single point of contact, we enable government, business and citizens to benefit from their collective expertise, products and services.

We also provide pan-European data produced using authoritative, reliable, comparable and verifiable geospatial data from official national sources. This includes open data, administrative boundaries, topographic mapping and a digital elevation model. Our production system is unique internationally, and a particularly important example of international collaboration in the geospatial area.

Experience of the European Strategy for Data

We consider the Communication "A European Strategy for Data" and the concept of data spaces, where data can flow within the EU and across sectors, an important development for the European digital market. Following the main principles of the Strategy – that the value of data lies in its use and re-use and the need for increased availability of high-value public sector data – EuroGeographics, together with its members, recognises that this framework will encompass the cross-border geospatial initiatives that we have been developing for many years.

The Strategy's implementation was supported by corresponding funding programmes, including the Digital Europe Programme.

EuroGeographics is the lead partner in the Digital Europe-funded project Open Maps for Europe 2 (OME2) which is delivering **a new production process, technical specification and prototype** for harmonised high-value data from multiple European countries under a single open licence.

This financial support has enabled us to build upon, and enhance the datasets delivered by the successful Open Maps for Europe project, which was co-financed by the Connecting Europe Facility, Open Maps for Europe enabled EuroGeographics to provide easy access to free-to-use harmonised data from more than 40 European countries, realising the benefits of the Open Data and re-use of Public Sector Information (PSI) Directive by driving innovation, market development, and growth to support the digital economy.

Access to high-value, large-scale, harmonised, and edge-matched pan-European datasets is a top request from users, in particular policymakers, and the OME2 project has seen higher-than-expected user numbers for all its datasets. By the end of 2024, an average of 491 new users a month were registering on the Open Maps For Europe portal. Since the launch of OME2, the total number of registered unique users has increased by 250% to over 19,000.

EuroGeographics recognises that beneficiaries have a responsibility to be sustainable following project funding. However, the open data concept requires a continuous release of data of at least the same or improved quality and quantity which incurs a cost for the data provider. Furthermore, datasets must be up-to-date, harmonised, and easily accessible to stakeholders. For EuroGeographics members, the challenge with the Open Data and re-use of the PSI Directive, which is one of the key Strategy pillars, is securing funding to ensure this sustainability.

A European Data Union Strategy as a next step

We support this initiative to explore options to increase the availability of high-quality data, consider possible investments in data infrastructures, examine ways to use data to reduce the administrative burden, including legal simplification, and address the external aspects of data flows.

We are willing to share our knowledge and experience gained through addressing the challenge of finding, easily accessing and licensing authoritative pan-European harmonised edge-matched, large-scale, high-value geospatial data, which feeds artificial intelligence and serves as a foundation for innovation across multiple sectors.

We are aware that Union priorities have largely changed due to new geopolitical circumstances, which put security, defence, and resilience at the forefront. This urged policymakers to define the critical infrastructure: an asset, a facility, equipment, a network or a system, which is necessary for

the provision of essential services. The pan-European geospatial reference data is the foundation for meeting these objectives, as the mapping of locations is the starting point and must be the first action for any coordinated approach addressing any critical cross-border sectors listed in the Resilience of Critical Entities Directive.

We strongly suggest that the forthcoming European Data Union Strategy includes a maintained, sustainably funded pan-European geospatial high-value large-scale dataset as a part of the investment in data infrastructure.

We believe that without sustainable investment in European value-adding, the large amount of currently available geospatial open data from official national sources will not be usable (serviceable) for cross-border requirements to meet the Commission's political priorities. They will remain fragmentated and disregarded despite the immense amount of national assets, and will challenge the overall concept of public sector open data in the long term.
The European Data Union Strategy should not only focus on the internal market or the digital economy but should also emphasize the potential of data for societal progress. To create value from the potential of the existing reliable data, the accessibility of data and its responsible use must be addressed in the European Data Union Strategy.

Digital Twins can play a significant role in responding to or preparing for changes in climate, spatial planning, geographical developments, or other potential impacts of events. The role of trusted geospatial data in creating and managing high-quality Digital Twins is essential, particularly for the Destination Earth (DestinE) initiative.

Regarding legal simplification as another pillar of the Data Union Strategy, we consider that **prioritising legal coherence is the best path towards simplification.** We have been raising this fragmentation issue for geospatial policy and data through all of our representation activities. The fragmentation prevents the Union and its business and citizens from maximising the benefits from high-value geospatial data collected from official sources. We are expecting progress to be made by the "A comprehensive policy framework for core geospatial data in the EU" pilot project proposed by the ITRE Parliament Committee, which will be launched by the end of this year.

The European Data Union Strategy should also explicitly address the role that public service providers play as data-supplying and data-demanding parties in the European data spaces. Public service providers have a different legislative framework regarding data and the provision of data, as well as the various roles that may apply to an organisation from different laws, such as data user, data controller, and data owner. The importance of the role of public service providers in data space initiatives and other data ecosystems should be sufficiently reflected in the European Data Union Strategy, with a good balance between the importance of societal benefits and strengthening the internal market for data.

Please do not hesitate to contact me for any additional clarification.

Your sincerely,

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