

*Commission Call for Evidence for an Impact Assessment of
“GreenData4All – updated rules on environmental spatial data and access
to environmental information”*

EuroGeographics’ feedback

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Brussels, 20th March 2024

Key points:

- Revision of the INSPIRE Directive represents a significant milestone for EuroGeographics’ members - the **opportunity to apply lessons learned** during the implementation period and to comprehensively regulate geospatial data governance.
- A number of EuroGeographics’ members are National Contact Points for INSPIRE, and many have **invested significant resources in the implementation of the Directive over the last 15 years**. Those investments should be protected and continued to benefit society.
- EuroGeographics’ members are keen to make their data available for the future Green Deal data space, which is a critical component supporting environmental policy development and implementations, as well as the transition to a more sustainable economy.
- EuroGeographics members' data also underpins every other data space established under the European Strategy for Data.

About us

EuroGeographics is an independent international not-for-profit organisation representing Europe’s National Mapping, Cadastral and Land Registration Authorities (hereinafter referred to as “NMCAs”). Our members provide a range of geospatial products, services, and expertise that support green and digital transition, 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 over the last 15 years.

About GreenData4All initiative and policy proposals

EuroGeographics welcomes this initiative and its overall aim for updating and modernising existing rules on establishing an Infrastructure for Spatial Information in the European Community. Revision of the INSPIRE Directive represents an important milestone for EuroGeographics' members. It is an opportunity for an appropriate solution to better govern geospatial data and geospatial knowledge infrastructure, which supports not only Green Deal priority actions on climate change, circular economy, zero pollution, biodiversity, and deforestation, but **every single data space annotated in the European Strategy for Data**.

The technical specifications for data and data sharing

We fully agree with the statement that the INSPIRE Directive's rules for spatial environmental data sharing tend to be overly rigid, complex to implement, and not user-friendly. To overcome these complications, the Europe Region of the United Nations Committee of Experts on Global Geospatial Information Management (UN-GGIM: Europe) has selected 14 INSPIRE themes as core data, and delivered simplified specifications that enable the creation of pan-European spatial data sets for EU-funded projects.

We support any action towards simplification and modernisation of the technical provisions for data harmonisation, network services, etc. **provided that previous investments are respected** and solutions are identified to finance new ones, such as APIs.

The scope of data to be covered in support of environmental policy development

The current thematic scope of INSPIRE includes 34 cross-sectoral categories, at least half of which are from the geospatial sector.

The Implementing Act on High-Value Datasets (HVD), which defines a list of datasets whose reuse can have major benefits for society and the economy, refers to the INSPIRE rules to make listed geospatial data available and accessible for reuse. Our members appreciated this level of coherence.

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.

This occasion of broad public consultations and discussion to make geospatial data functional for the future Green Deal and all other data spaces could be an opportunity to set a pathway towards changing such backgrounds.

One of the solutions considered in this Call is refocusing the scope of the INSPIRE Directive on environmental data while leaving non-environmental data (cadastral parcels and agricultural parcels, buildings, road networks, etc.) out of scope – to be covered by other sectoral tools.

We can understand that data describing the state of the environment and pressures upon it were inadequate in the INSPIRE Directive and this has to be amended. However, **geospatial and location information are critical components for environmental monitoring and reporting providing an accurate continuous observation of the territory, which is necessary to deploy the Green Deal actions.**

By conforming with the INSPIRE Directive, Europe's NMCAs have rendered their data discoverable, accessible and interoperable. While INSPIRE is rigid, it provides a clear framework within which to manage geospatial information. The proposal of removing the non-environmental data (cadastral parcels and agricultural parcels, buildings, road networks, etc.) out of the scope of the updated rules to be covered by other sectoral tools without defining which these are, risks having little or no governance in the geospatial sector.

We believe that the 'other sectoral tools' should be defined, this cannot be left only to the Implementing Act on HVD which touches only a small segment of the geospatial sector. Suggestions can include for example new Geospatial Regulation; Geospatial Strategy for data spaces; or Guidelines on Geospatial Data for GreenData4All.

In any case, we believe a separate chapter of the GreenData4All initiative should refer to the geospatial data component and its role in the Green Deal data space.

The organisational / governance structure

The absence of a nominated role for NMCAs in many formal procedures means there are shortcomings in existing geospatial data governance, currently fragmented across different policy areas. NMCAs experts are not represented in all relevant committees and expert groups. **A coordination mechanism, or integration with the governance structure established under horizontal data legislation, would be a solution with a guarantee for the inclusion of National Mapping, Cadastral and Land Registration Authorities representatives.**

Final remarks

We are aware that this initiative is an important component of the future Green Deal dataspace based on the European Strategy for Data. This strategy is progress that we want to support and make successful.

Our members' strategic goal is to make their data available for all data spaces.

However, we consider the Green Deal Data space a priority since it is understood as a continuation of 15 years of investment in the implementation of INSPIRE.

We are open to, and would welcome, an active role in the future debate to get the best solution for the functional Green Deal data space, and coherent geospatial data governance, while also preserving the sustainability of EuroGeographic's members' work.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "S. L. Payne". The signature is written in a cursive, flowing style.

Sallie Payne Snell,

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