
EuroGeographics' feedback on

“Digital Omnibus (Digital Package on Simplification)” Call for Evidence

TR 51080067776-74

Brussels, October 2025

Ref.no.2025-111

About EuroGeographics

EuroGeographics is an independent international not-for-profit organisation representing Europe's National Mapping, Cadastral and Land Registration Authorities.

EuroGeographics is committed to providing easy access to, and encouraging greater use of, map, land and geographic information from the European National Mapping, Cadastre and Land Registry Authorities. We believe in a society empowered by the use of trusted geospatial services from these official national sources.

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.

Implementing the Open Data and re-use of PSI Directive

EuroGeographics members have been investing significant money, time and resources to meet the requirements of the Open Data and re-use of PSI Directive, which left them without significant income due to the introduction of the free-of-charge regime for certain categories of datasets.

EuroGeographics, as a membership organisation was 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 project was an opportunity to showcase to policymakers and users the potential and demand for public sector data, with both significantly exceeding initial estimates of user numbers, but also to demonstrate what needs to be improved in the existing frameworks, because our experience is that:

- Making trusted public sector data available online does not necessarily make them (re) useable. Useability can only be achieved through additional output at the point of delivery, which requires specialised knowledge and investments. That would be a harmonisation of the data themselves, the access licence harmonised across borders in the correct data format to feed straight into user systems, etc.
- There is a need for more consideration for sector-specific specifics, such as in geospatial, taking into account the complexity of data collection and maintenance.
- There is a need to acknowledge and support sector umbrella organisations such as EuroGeographics, as it is essential for cross-border communication and coordination beyond the political level, which is vital for seamless data flow and the EU value adding.
- Public sector information can contain information protected under the personal data protection rules, which cannot be made open to all. To overcome this, different levels of access to data may be needed, depending on the user type.
- By not being able to capture who the users are, we are not able to cater to evolving specific users' needs and requirements, which might leave the public sector at the margins of the data market.
- 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 is securing funding to ensure this sustainability.

Legal coherence as a path to simplification

We support this initiative, which targets problems and seeks simplification in the annotated policy areas to reduce compliance costs.

It has to be recognised that in practice, each Member State implements the regulation in different ways. In the geospatial domain, in some Member States, even the cadastral parcel number is considered personal data. On the other hand, in some Member States, you can search the national geoportal by address and access full personal details of the owner, including personal identification number, mortgage details, and transaction history.

We consider that harmonising the reuse rules under the Data Governance Act and under the Open Data and re-use of PSI Directive in one legal act will increase legal clarity. Having one legal act also minimises the possibility of conflict or contradiction between the two instruments. It contributes to better governance because it assumes one national contact point is accountable. It will also mitigate the risk of uneven implementation in Member States, which is the biggest barrier for cross-border re-use and EU value adding. Still, the anonymisation and other toll costs will remain a challenge.

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.

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



Your sincerely,

Sallie Payne Snell
Secretary General and Executive Director

w. www.eurogeographics.org
e. sallie.payne@eurogeographics.org
m. + 44 (0) 7768 386230