



## EUROCITIES & CEMR joint position on 'European Interoperability strategy for European Public Services'



EUROCITIES and the Council of European Municipalities and Regions (CEMR) welcome the work of the European Commission to support interoperability and the opportunity to comment on the European Interoperability Strategy for Public Services (hereafter EIS).

EUROCITIES and CEMR are representative organisations of local and regional authorities at European level. EUROCITIES is the European network of major cities, bringing together over 140 cities from across Europe. CEMR is the broadest organisation of local and regional government in Europe; its members are over 50 national associations of towns, municipalities and regions from 38 countries. Together these associations represent some 100,000 local and regional authorities.

### General remarks

1. The programme on Interoperability Solutions for European Public Administrations (hereafter ISA) is 'a programme on interoperability solutions for European public administrations, including local and regional administrations and Community institutions and bodies, providing common and shared solutions facilitating interoperability'. Local and regional authorities should therefore have a prominent role to play both in designing and implementing the roll-out of this programme and any other work concerning interoperability.
2. The objective 'to support cooperation between European public administrations by facilitating the efficient and effective electronic cross-border and cross-sectoral interaction between such administrations, including bodies performing public functions on their behalf, enabling the delivery of electronic public services supporting the implementation of Community policies and activities.' (article 1.2) can not be achieved without the active involvement of local and regional authorities. This must cover cross-border, horizontal and vertical interoperability.
3. For interoperability to be effective it must encompass all levels of government, the European, national, regional and local levels. Interoperability between national administrations is not sufficient if interoperability at local level does not work.
4. The Commission should establish forms of structured cooperation with local and regional authorities and provide experts from local and regional authorities with access to thematic expert/advisory groups set up within the framework of the ISA programme or following the adoption of EIS. The Commission should establish an expert group with representatives from local and regional authorities to provide input, and launch and support projects and studies on the challenges and solutions local and regional authorities face, which should be financed under ISA.

5. It is important to create a common understanding and language between the different layers of government in the EU/EEA Member States and across the Member States as well as with private stakeholders. Specific task groups at Member State level to facilitate the implementation should involve all levels of public authorities as well as other stakeholders to help creating a common understanding, common aims and a smooth implementation.

## Comments on the hearing document

6. The document (point 14.1 and 14.2) refers to the 'top-down' and 'bottom-up' approach. As we understand these terms, their use in this specific context might be misleading. We propose therefore to replace them by global (instead of top-down) and sectoral (instead of bottom-up).
7. We welcome the proposal under 14.3 'to work via a limited number of politically relevant and concrete sectoral projects at EU and Member States levels;' however, in our view it is crucial to extend these projects and to include the regional and local level. This might be intended, but should be expressed explicitly to make sure local and regional administrations are involved.
8. Concerning the cluster 'Assessment of ICT implications of EU legislation' (point 14.5), it is important to assess also the impact on the local and regional level and to involve local and regional authorities. Often the implications of EU legislation are strongest at local and regional level (see e.g. the services directive).
9. Local and regional governments should also be involved in the accompanying measure 'Raising Interoperability Awareness' (point 14.6). Our experience with the preceding Commission programme on interoperability shows that the issue is not necessarily known at local level. There is an urgent need to raise awareness of the EIS and ISA at sub-national level. For this, it is crucial to develop an understanding of what interoperability and EIS/ISA is about - not only for ICT experts but for the senior administrative and political representatives of cities, municipalities and regions.
10. The Commission should support capacity building of local and regional staff on interoperability, open source etc. The Commission should also support the development and implementation of standards and solutions for interoperability (technical and semantic) in local and regional administration and encourage intermunicipal cooperation.
11. The Commission should also support the translation of national ICT guidelines and recommendations into English in order to stimulate the exchange of experience and knowledge.
12. Local and regional authorities should also be invited to contribute to the section 'Sharing Best Practices' (point 14.7). For ISA to reap the greatest benefits, the programme has to be included in national, regional and local ICT-architecture. A good practice example would be that the Netherlands encourage local authorities to set up local implementation plans which combine ISA objectives with their own ICT-plans.