

Webinar Q&A

Interoperability in action: act and assessments

29/01/2025 10:00 – 11:00 am CET

During this webinar organised by the Digital-ready Policymaking (DRPM) community, the speakers discussed the next steps for making interoperability a reality. The topic sparked a heated debate in the chat as well as during the Q&A part when the participants could ask their questions by themselves. Below, we summarised some of the questions raised during the webinar.

Watch the event's recording and the presentation [here](#).

- Do you provide an API for the interoperability assessment? In case, shall we gather the data in a national portal and then send it to the EU?

Yes, an API for assessments is being developed and will be published this year. The Act clarifies that the report of an interoperability assessment shall be published at least on an official website in a machine-readable format ([Art. 3 \(2\), IEA](#)). The national competent authorities can further designate other, public locations where the reports can be published. Therefore, it is up to you the Member State to decide where to gather the data, as long as it is an official website – one option can certainly be a national portal.

- How do I know if my entity is in scope?

It is important to consider who the obligation of interoperability assessments apply to. Article 1 (2) of the Interoperable Europe Act (IEA) states that “*This Regulation applies to **Union entities and public sector bodies that regulate, provide, manage or implement trans-European digital public services***”. You would therefore need to check whether these criteria apply to you.

- **Public sector bodies** are defined in Art. 2 (6) IEA in the same way a public sector body is defined by Article 2(1) of the Open Data Directive, namely: *I) State, regional or local authorities; II) bodies governed by public law ; or III) associations formed by one or more such authorities or one or more such bodies governed by public law*. This definition is used not only in the context of the Open Data Directive but also for the eIDAS Regulation. Consequently, a public organisation that falls within the scope of those legislative acts also falls within the definition of a public sector body according to the IEA.
- Secondly, you would have to determine whether any of the services that your entity regulates, provides, manages or implements are **trans-European digital public services**, i.e., *digital services provided by Union entities or public sector bodies to one another or to natural or legal persons in the Union, and requiring interaction across Member State borders, among Union*

entities or between Union entities and public sector bodies, by means of their network and information systems (Art. 2 (2) IEA). For this, it is important to keep in mind that full discretion of the definition and regulation of public services lies with the Member States (Art. 1 (3) IEA).

- If both of these are given, i.e., your entity constitutes a public sector body and it regulates, provides, manages or implements a trans-European digital public service, then you are within scope of the regulation.
- Lastly, many of the instruments of the IEA are also offers (such as trainings, the interoperability assessments or the regulatory sandboxes). While the question of legal applicability is of course important, we would invite you to assess which instruments of the IEA could provide value in your organisations.
- How do you explain interoperability to normal people?

Interoperability focuses on connecting different sources while respecting the singularity of these sources and allowing individual access to them. In opposition to this, integration aims at “making things the same”. For example, interoperability allows for the connection of different national systems that all have their own legal basis and workflows. Integration would mean that these systems must change to adjust their workflows to each other so that they are the same, most likely also resulting in having to change the legal basis.

Often, interoperability is understood in technical terms, like the example of systems mentioned above. However, interoperability actually touches upon several different layers, including semantic, legal and organisational. The European Interoperability Framework defines interoperability in these four layers, and except for technical:

- Semantic refers to the meaning of the data that is being exchanged: e.g., is what I say being understood in the way I intended it?
- Legal interoperability refers to the ability to exchange data in the first place: e.g., am I allowed to exchange the data and under which circumstances?
- Organisational interoperability refers to the process of exchanging data: e.g., where is the data that I want to exchange stored/accessible and who do I exchange it with?

These are only some very basic overviews. If you want to learn more, you can have a look at the trainings provided by the [Interoperable Europe Academy](#). These include trainings on [interoperability](#), the [European Interoperability Framework](#) as well as the [Interoperable Europe Act](#).

- Does the Act require that the assessments are made public?

Yes, [Art. 3 \(2\)](#) clearly states that “The Union entity or public sector body concerned shall publish, in a machine-readable format facilitating automated translation, a report presenting the outcome of the interoperability assessment, including the items listed in the Annex, on an official website.”

- Do the National Competent Authorities (NCA) under the Interoperable Europe Act also need to have competences under others acts like the Single Digital Gateway, AI Act or similar?

The obligation from the Interoperable Europe Act to assign a national competent authority is, in theory, not related to the obligations to assign such competent authorities from other EU digital policies.

However, in national contexts, it can be the case that the national competent authority designated for the IEA also works as national competent authority for other EU legislation.

- Apart from assessment, are there any provisions for standardised recommendations for interoperability APIs per domain areas? Is the EC working on anything like that (obviously in many domains there are already domain-specific standards, but do they connect to the Interoperability Act going forward?)

Stemming from the Interoperable Europe Act, there are no provisions for standardised recommendations for interoperability APIs per domain area. It is possible that certain domain-specific APIs will become part of the recommended Interoperable Europe Solutions (i.e., interoperability solutions recommended by the Interoperable Europe Board). In general, the Interoperable Europe Act contains several instruments that should facilitate the agreement on such standards (e.g. the implementation support projects or the interoperability regulatory sandboxes, interoperability community), but the act is not the right instrument to set any binding standards for public services as such. Concrete work on this is already happening in the wider interoperability community though: The Joint Research Centre has, for example, published technical reports that could be of interest: [APIs for Innovative Public Services \(API4IPS\)](#), including a technical, legal, and organisational essentials.

- Are there plans to introduce some kind of control mechanism (for completeness, accuracy) when assessment reports are uploaded to the portal? What happens if the reports do not comply with the guidelines or the framework?

The current version of the tool just provides very limited aid to ensure completeness of the report. In the future, those features can be enhanced through additional functionalities. All reports will go through a spam filter.

- The example is about a physical card, but how do you establish interoperability between different systems in a more general approach if we don't have a unified identification for every citizen interoperating in different EU countries?

The EU disability and parking card is both in physical and digital format. Moreover, the disability and parking card will most likely be checked in combination with an Identity card, which should serve as a unique identifier across borders. This is also because interoperability between digital public services and their systems actually relies on secure identification of individuals. This should happen through their eID, for which significant efforts have already been made with the eIDAS regulation. This regulation establishes a framework for digital identity and authentication and this way for mutual recognition for eIDs issued by EU countries. This ensures their interoperability across borders as well, even though the eIDs might be set in different national contexts. The Interoperable Europe Act does not replace this initiative but links it to the ongoing initiatives.

- Some binding requirements may fall in more than one interoperability aspect or are somewhat between two aspects. For example, the Once-Only Principle affects both the organizational aspect, by requiring process alignment, and the technical aspect, by needing secure and interoperable data exchange. How should these cases be categorised?

The categorisation by layer is recommended to help detect different obstacles to interoperability by taking different viewpoints on the topic. Binding requirements can touch upon more than one layer of interoperability (legal, organisational, semantic or technical). They can be categorised for all the

layers they affect, preferably with a short explanation how this translates into practice, e.g. requiring the Once-only principle for a new system would be good for cross-border interoperability because it reduces the amount of data that is necessary to exchange and significantly reduces the necessary steps to retrieve information. It would also be beneficial for technical interoperability because systems only interact one with the directly responsible entity not with the entire chain through which the data might travel otherwise.

- How can we apply this new obligation within our (soon to be launched) EU language data space? For semantic, legal, technical and operation interoperability? And how about the other data spaces that already exist: Health, Tourism, Transport etc (<https://dssc.eu>)

If you are not legally required to do the assessment, you could still use it to assess the rules and requirements you set for the EU language data space. The interoperability assessment could serve as a reflection exercise and informal assessment of the impact of the rules and requirements you set. For example, for access you could require an EU Login which would ease cross-border interoperability as it would allow for secure authentication independent of where the user comes from. In this manner you could also reflect on other requirements that are necessary for accessing the data space. Some interoperability solutions within the data spaces might also be potential candidates for becoming Interoperable Europe solutions. Legal questions could be discussed in an Interoperability regulatory sandbox.

- Should the interoperability assessment report be delivered in the national language or in English?

You are free to do the assessment in your own language, as long as it is done in a machine-readable format ([Art. 3 \(2\), IEA](#)) which facilitates automated translation.

- For all questions related to the European Disability and Parking Card that was used as an example for the interoperability assessments, please [visit this website](#).