Public consultation on the revision of the Union legislation on vehicle type-approval (Regulation (EU) 2018/858) with regard to access to in-vehicle generated data for the purpose of providing vehicle-related and mobility service

Fields marked with * are mandatory.

Introduction

The Commission adopted the Data Strategy[1] to unleash the potential for innovation lying in industrial data. The Commission proposal on the Data Act is the last major cross-sectoral legislative initiative under the Strategy. The data strategy also announced the review of the current EU vehicle approval legislation for what concerns access to vehicle data. Access to vehicle data has been regulated at the EU level since 2007 as regards repair information and on-board diagnostic (OBD). Since then, the market for connected vehicles has developed. Connected vehicles now allow not only remote access to vehicle data, but also remote access to functions (e.g. remote door unlocking for car sharing, launching diagnostic routines) and resources (e.g. displaying information on a vehicle dashboard). This remote access enables not only remote diagnostic, but also new services such as mobility as a service, pay-as-you-drive insurance or smart charging.

The proposal for the Data Act will empower consumers and other users of connected products with the right to have access to any accessible vehicle data and the right to share such data with third parties. It introduces in particular consumer rights to access and share data with third parties, compensation and contractual principles for Business to Business data exchange, sets rules for Business to Government data access in case of emergency, as well as cloud services switching principles.

The Commission proposal for the Data Act is conceived as an instrument addressing access to data on connected devices across sectors. The Data Act will have a major impact on the mobility ecosystem, boosting innovation and competition in aftermarkets and other automotive services. Nevertheless, the horizontal framework of the Data Act may not address all the specificities of each industrial ecosystem. For instance, automotive aftermarkets may benefit from some additional measures.

The present questionnaire aims at consulting the public and the various groups of stakeholders on their experience and views concerning access to in-vehicle generated data for vehicle-related and mobility services[2] and on possible legislative measures to ensure fair and secure access to vehicle data, functions and resources.

[1] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM/2020/66 final.

[2] This category is conceived broadly, as any service related to the use of a vehicle, the provision of which requires or is improved by in-vehicle generated data. It includes also services relating to participation of electric vehicles in the electricity market (such as bi-directional charging, i.e. from vehicle to grid/home).

Guidance on the questionnaire

This public consultation consists of some introductory questions related to your profile, followed by a questionnaire. **Please note that you are not obliged to respond to all questions in the questionnaire.**

At the end of the questionnaire, you are invited to provide any additional comments and/or to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire as well as the uploaded position papers and policy briefs will be published online. Please read the specific privacy statement attached to this consultation informing on how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your contribution will be treated and published together with those received from individuals.

About you

*Language of my contribution
- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian

- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

*I am giving my contribution as

- ○ Academic/research institution
- ● Business association
- ○ Company/business organisation
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

*First name

Zoi

*Surname

Sagia

*Email (this won't be published)

z.sagia@etrma.org

*Organisation name

255 character(s) maximum

European Tyre & Rubber Manufacturers Association

*Organisation size
- ● Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](). It's a voluntary database for organisations seeking to influence EU decision-making.

6025320863-10

*Country of origin

Please add your country of origin, or that of your organisation.

○ Afghanistan	○ Denmark	○ Libya	○ Saint Pierre and Miquelon
○ Åland Islands	○ Djibouti	○ Liechtenstein	○ Saint Vincent and the Grenadines
○ Albania	○ Dominica	○ Lithuania	○ Samoa
○ Algeria	○ Dominican Republic	○ Luxembourg	○ San Marino
○ American Samoa	○ Ecuador	○ Macau	○ São Tomé and Príncipe
○ Andorra	○ Egypt	○ Madagascar	○ Saudi Arabia
○ Angola	○ El Salvador	○ Madeira	○ Senegal
○ Anguilla	○ Equatorial Guinea	○ Malawi	○ Serbia
○ Antarctica	○ Eritrea	○ Malaysia	○ Seychelles
○ Antigua and Barbuda	○ Estonia	○ Maldives	○ Sierra Leone
○ Argentina	○ Ethiopia	○ Mali	○ Singapore
○ Armenia	○ Falkland Islands	○ Malta	○ Sint Maarten
○ Aruba	○ Faroe Islands	○ Marshall Islands	○ Slovakia

- Australia
- Austria
- Azerbaijan
- Azores
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- ● Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands

- Fiji
- Finland
- Former Yugoslav Republic of Macedonia
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana

- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger

- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Swaziland
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste

- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Canary Islands
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba

- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos

- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy

- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen

○ Curaçao	○ Latvia	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Cyprus	○ Lebanon	○ Saint Kitts and Nevis	○ Zimbabwe
○ Czech Republic	○ Lesotho	○ Saint Lucia	
○ Democratic Republic of the Congo	○ Liberia	○ Saint Martin	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Feedback publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

◉ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the [personal data protection provisions](#)

Questions

Understanding of the present situation

Between July 2019 and March 2020, the European Commission services organised a series of workshops with stakeholders to collect information on the current situation on vehicle-related and mobility services dependent on access to in-vehicle generated data. Additionally, between 2019 and 2021 a study on access to in-vehicle data, functions and resources (to be published together with the impact assessment to this initiative) was prepared.

The questions below aim at confirming and complementing the findings based on the aforementioned sources of information with a wider group of stakeholders on what is today the availability of vehicle-related and mobility services based on access to vehicle data, functions and resources as well as how easy it is to access in-vehicle generated data for the purpose of providing or developing these services.

Possible way forward

In this section all respondents are invited to share their views on the need for, scope and expected impacts of a legislative intervention that would aim at complementing the Data Act. The purpose of these questions is to obtain views on the relevance of possible measures aiming at creating benefits from different economic, social and environmental perspectives and on the need for a possible regulatory intervention.

8. Today, access to repair and maintenance information is subject to articles 61 and seq. of Regulation EU/2018/858. Access to other in-vehicle data for other purposes is not covered by Regulation EU/2018/858. Relevant applicable rules include competition rules and data protection legislation, and the upcoming Data Act (legislative proposal adopted by the Commission on 23 February 2022).

Do you consider that the current and upcoming legal framework applicable to access to in-vehicle generated data and resources sufficiently ensures fair and non-discriminatory access by all services providers (vehicle manufacturers, independent service providers and public authorities)?

- ○ Yes
- ◉ No
- ○ I don't know

Please explain.

500 character(s) maximum

9. Which other issues beyond access to data would need to be updated in the vehicle approval legislation to take into account of the latest technical

developments (e.g. on automated vehicles, on electric vehicles)?

Please explain

500 character(s) maximum

> Legislation should also address access to in-vehicle functions, resources, as well as, types of access profiles & independent cybersecurity framework scheme. The access to in-vehicle data should not be limited to cloud access but access should be given to other modes based on vehicle capabilities, like edge computing. Further, possibility to interact with the driver regardless the level of automation, rules for accessing HMI & categorization in the assessment of the interactions should be given.

10. Do you agree with the following statement:

	Yes	No	I don't know
There is no need for regulatory intervention. Access to in-vehicle generated data can be best handled by the market.	○	●	○
Measures must be implemented to secure access to in-vehicle data (while respecting general principles of fairness and non-discrimination)	●	○	○
How vehicle data can be technically accessed (i.a. on board, on an external server etc.) should be regulated to ensure a secured, fair and non-discriminatory access	●	○	○
The possibility of multiple direct, on-board access by services providers to vehicle data and functions will make it substantially more difficult to ensure safety and/or cybersecurity of the vehicle (as compared to access on an external server)	○	●	○
Rules on access to vehicle data, functions and resources should not only improve access for the purpose of providing vehicle-related and mobility services, but also enable public authorities to perform their tasks, i.e. in the field of climate, environmental and road safety policies.	●	○	○

11. If you would like to explain further your above answers, please use the following free text box:

2000 character(s) maximum

> Tyre Industry advices that the upcoming regulation should address all the possible vehicle communication interfaces including but not limited to On-Board Diagnostics Port, Web Server, Human Machine Interface, In Vehicle Infotainment system access, Intelligent Transport Systems etc.
> Standards like SVI provide a solution how to cyber secure on-board access, whereas ITS ones are another example for multiple cyber secure access.

12. Do you agree with the following statements:

Remote access to more, better quality in-vehicle generated data, functions and to vehicle resources...

	Yes	No	No opinion
is necessary to provide new vehicle-related and mobility services	◉	○	○
is necessary to enable the customers[1] to enjoy better choice, prices and quality of vehicle-related and mobility services (The category of 'customers' as used in this questionnaire refers to both professional customers, e.g. fleet owners and individual users) [1] The category of 'customers' as used in this questionnaire refers to both professional customers, e.g. fleet owners and individual users	◉	○	○
will enable fair competition	◉	○	○
will contribute to improving road safety and reducing environmental impacts, such as air emissions	◉	○	○
will lead to disappearance of certain small workshops/service providers who are not prepared for digitisation of their services provision	○	○	◉
will lead to small workshops/service providers widening their share of the market	○	○	◉
will require additional measures to protect privacy and personal data to be implemented by stakeholder to ensure General Data Protection Regulation (GDPR) compliance	○	◉	○
will require increased investments and costs for vehicle manufacturers	○	○	◉
will require increased investments and costs for services providers	◉	○	○
will reduce vehicle manufacturers share of vehicle related (e.g. aftermarket) and mobility services	○	◉	○
will result in more expensive vehicles being offered	○	◉	○
will result in less innovative vehicles being offered	○	◉	○
will result in more innovative vehicles being offered	◉	○	○
will result in lower prices of vehicle components	◉	○	○
will result in more innovative vehicle components	◉	○	○
will result in new/more innovative services for customers	◉	○	○
will result in an increase of the personnel of services providers, due to the expansion of the market	◉	○	○

Assessment of the impact of possible measures on access to vehicle data, functions and resources

The proposal for the Data Act will empower consumers with the right to have access to any accessible vehicle data and the right to share such data with third parties.

However, the Data Act provisions do not go into the details of access to functions and resources, which is crucial for the provision of data-dependent services in the automotive sector. In addition to ensure a proper implementation of the data act in the automotive/mobility ecosystem, such principles could be complemented by measures providing for standardisation on the data sets vehicle functions and resources concerned and by rules ensuring effective, safe and secured access as well as protection of privacy personal data and intellectual property.

The purpose of the questions below is to collect views of the expected positive and negative impacts for a set of possible measures, to inform the formulation and assessment of policy options by the Commission services. These questions are addressed to all citizens and stakeholders including public authorities in charge of specific public interest.

13. For each measure below, please tick the relevant boxes if you foresee positive or negative impacts. In the relevant box near each proposed measure, please mark your assessment of the general impact of the measure on your organisation. In the following rows, please advise on the expected specific impacts of the measure (on competition, innovation etc.). In answers to the following questions, you will be able to give more details with free text on the expected impacts.

	Positive impact	Negative impact	Neutral or no opinion
1. Requirement for vehicle manufacturers to publish a catalogue of vehicle data and functions remotely accessible on a vehicle. *In addition to the transparency requirements of the Data Act, such a catalogue could contain the data parameters available for remote access, the data specification and format, as well as availability of functions and resources accessible remotely.* Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	○	○	◉
Impact on environment	◉	○	○
2. Further requirements (in addition to those proposed under the Data Act) of non-monitoring of the business activity of a third party operator accessing vehicle data. *This requirement, complementing the general provisions of the Data Act, would allow*			

identification only for limited number of purposes, that would be listed in the Regulation , while requiring e.g. to mask the identity of the customers of services and of the service providers themselves in other cases; structural or functional arrangements to prevent monitoring in cases where identification is necessary.Compliance with such a legislation would be subject to periodic auditing by public authorities. Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	○	○	◉
Impact on environment	◉	○	○
3. Principle of equal remote access to data, functions and resources that are accessible to the vehicle manufacturer, together with safety/cybersecurity principles and reporting obligations on the implementation of such principles. *This requirement would include the possibility to communicate with the driver. Implementing rules could further define in more detail what conditions would be considered unfair or discriminatory and which restrictions could be considered justified.* Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	◉	○	○
Impact on environment	◉	○	○
4. Requirement to make a minimum set of standardised data, functions and resources to be remotely accessible to services providers. *Such a minimum list would be defined in an annex to be revised periodically via a Commission Regulation to stay in tune with technological development This measure could also define the specifications and format of those data and functions included in the minimum set.* Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	○	○	◉

Impact on environment	◉	○	○
5. Requirements to preserve the access to the On-Board Diagnostic (OBD) port open while ensuring security of "writing" access, e.g. by means of an independent accreditation, approval and authorisation scheme. *Today, many services providers use the vehicle's OBD to collect vehicle data remotely. However, such remote access to the OBD port is being restricted for cybersecurity purposes. The requirement referred to above would aim at preserving access to the OBD the extent possible without compromising cybersecurity of a vehicle.* Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	◉	○	○
Impact on environment	◉	○	○
6. Provisions further specifying the conditions and means of access, to on-board platforms, whenever such platforms are available in the vehicle, with defined criteria and process for admission of applications to such platforms (same for all third parties' and manufacturer-related entities). Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	◉	○	○
Impact on environment	◉	○	○
7. Governance rules on remote access to enable a secured but non-discriminatory access of the different stakeholders. These rules would further specify the manner in which access to data would be performed and controlled. Impact on competition	◉	○	○
Impact on innovation	◉	○	○
Impact on safety/security	◉	○	○
Impact on intellectual property rights	◉	○	○
Impact on privacy	◉	○	○
Impact on employment	◉	○	○

14. I would like to further explain expected positive or negative impacts of the requirement for vehicle manufacturers to publish a catalogue of vehicle data and functions remotely accessible on a vehicle.

1000 character(s) maximum

> The requirement to publish a catalogue of vehicle data will not only increase transparency but also facilitate interoperability of services across vehicle brands enhancing users experience. By creating trust, the measure will facilitate the adoption of connected mobility, and increase the deployment of relevant services.

15. I would like to further explain expected positive or negative impacts of further requirements (in addition to the measures already proposed in the Data Act) to prevent monitoring of the activity of a third party operator accessing vehicle data, function and resources.

1000 character(s) maximum

> In many cases, the vehicle manufacturer (VM) is also a service provider. Having access to the full log of third parties access to vehicle data, function and resources, would represent an unfair and anti-competitive behaviour of VM. Technical solutions can be implemented to encrypt the identity of the third parties through the use of credential assigned by an independent authority.

16. I would like to further explain expected positive or negative impacts of the principle of equal remote access to data, functions and resources that are accessible to the vehicle manufacturer, together with safety/cybersecurity principles and reporting obligations on the implementation of such principles.

1000 character(s) maximum

> Putting in place an independent cybersecurity governance scheme by setting-up the missing key technical harmonized requirements is essential to ensure a fair-level access for all actors of the ecosystem. A governance scheme based on SERMI roles extension, or another independent entity could deliver the requested authentication for accessing in-vehicle data.

17. I would like to further explain expected positive or negative impacts of possible requirements to make a minimum set of data, functions and resources to be remotely and directly accessible.

1000 character(s) maximum

> The service providers should access, either remotely or locally, all the data,
> functions & resources available in the vehicle. A minimum set of data will enable the development of a multitude of services, which can be provided to users regardless of the brand or model of the vehicle.

14

18. I would like to further explain which data/functions should be part of the set referred to in question 17. In addition to general description below, you can also upload a document with more detailed specification.

1000 character(s) maximum

> Standardization of common dataset as were presented in the Access to Vehicle Data & Cybersecurity Expert Group session in 2019, including 512 datapoints, plus standardization of functions and human machine interface.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

19. I would like to further explain expected positive or negative impacts of possible requirements to preserve the access to the On Board Diagnostic port open open while ensuring security of "writing" access.

1000 character(s) maximum

> This is highly important to ensure continuity of services and at the same time allow innovation to occur and development of new services. As more and more vehicles are becoming electric, the usual role of the OBD is being at risk. In this respect, the new legislation should consider the OBD not only linked to environmental performance monitoring, but also as a full entry point to the vehicle data, which should be kept open and operational.

20. I would like to further explain expected positive or negative impacts of possible provisions specifying the conditions and means of access to on-board platforms, whenever such platforms are available in the vehicle, with defined criteria and process for admission of applications to such platforms (same for all third parties' and manufacturer-related entities)

1000 character(s) maximum

> Possibility to access and process the data inside the vehicle reduces latency, reduces data storage needs and at the same time saves energy, as the data do not need to be transmitted outside of the vehicle. In addition, vehicle manufacturers related entities and third parties will have an equal foot when accessing data for service provision to the end users.

21. If the Union legislation was to require any of the measures establishing defined criteria and process for admission of applications to on-board platforms, what should be the criteria for admission of third-party applications and a secured access to vehicle data?

500 character(s) maximum

This regulation shall assign an independent authority responsible for issuing credentials, and giving authorization to third parties and vehicle manufacturers related entities to access vehicle data. The regulation shall introduce standard cybersecurity criteria which will apply to all stakeholders in the ecosystem.

22. I would like to further explain expected positive or negative impacts on possible governance rules on remote access to enable a secured but non-discriminatory access of the different stakeholders

1000 character(s) maximum

Fair and non discriminatory access to in vehicle data for all actors is required for the new emerging service market when the vehicle is in in motion. The clear rules will allow free competition and reinforce European industry. By defining clear rules on roles, functions and responsibilities, clear liability can be attributed which enhances transparency and legal certainty for all actors in the ecosystem.

23. Taking into account the measures already proposed in the Data Act, which additional aspects of B2B contracts should be regulated for the sector? Which aspects should be left to the parties?

500 character(s) maximum

Sector-specific rules should increase clarity and strengthen the intention of the Data Act, on the use of derived data by the user's chosen third parties, and the scope of the protection from unfair contact terms and compensation safeguards.

24. Do you see any other measures that should be considered? If so please explain their impacts

500 character(s) maximum

Tyre Industry is asking for consistency of the implementation of horizontal regulation (Data Act) & sectoral one. In addition, reasonable lead time for the market to implement the new requirements of the upcoming legislation should be given.

25. Do you see any other impacts of the proposed measures?

1500 character(s) maximum

Other impacts of the proposed measures can be on the communication between the service provider and the user (considering different means of communication) and the interplay of these rules with the GDPR (how the driver is giving consent & without being distracted). Sectoral legislation should bring more clarity on these points.

Any additional comments

If you have any comments or supplementary information to add to your replies to the above questions, please insert this here:

1000 character(s) maximum

see additional file

Final Remarks

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.
Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

45508612-6aad-4d00-bd05-c059bd3288e5/ETRMA_final_remarks-compressed.pdf

Contact

grow-i2@ec.europa.eu