Annotated agenda – Nordic-Baltic coordination network on regulatory issues (NOBAREG)

Time: 1. and 2. April 2025(Day one: 10-17, day two 9-15)

Venue: Danish Agency for Digital Government

Participants

Denmark	Latvia	Sweden
Denmark	Norway	Finland (Digital)
Iceland	Aaland Island	Estonia (Digital)

Tuesday 1. April

Topic	-
Report from the WG@CA for AI meeting in Lisbon	**Overview of the Lisbon Meeting** Thomas provided a report from the recent **WG@CA for AI** meeting, which took place just one week before the current NoBaReg session. In addition to a **UNESCO-organized workshop**, the meeting focused on critical topics related to AI supervision and implementation of the **AI Act** across Member States. Breakout sessions were held on the following topics: 1. GPAI (General Purpose AI) 2. AI Labs 3. Transparency 4. Annex I (Classification of High-Risk AI Systems) 5. Cybersecurity 6. Prohibited AI Practices 7. Regulatory Sandboxes 8. AI Literacy 9. Incident Management and Reporting Slides shared at the Lisbon meeting were included in NoBaReg's Master Deck and covered: • The **decentralised model** emerging for appointing Competent Authorities (CAs) • A **stocktaking** exercise on Member States' AI readiness • Strategies for **innovation-friendly supervision** • The planned **sub-group structure** within the AI Board • A review of **practical tools and challenges** related to supervisory work **Points of Interest for NoBaReg**

Topic	-
	- **Regulatory Sandboxes** were highlighted as an area gaining momentum. Notably, **Estonia reached out** to NoBaReg to explore opportunities for coordination or collaboration—even though AI is no longer part of NoBaReg's current mandate. Adam and Thomas will follow up with a meeting and consider possible support channels, potentially involving the Nordic Council of Ministers. - The **European Commission** is expected to establish **additional subgroups** under the AI Office, including one focused on regulatory alignment. - The PL noted the **Austrian approach** to AI Act implementation as pragmatic and pedagogical—potentially a reference model for others. - Discussions around **General Purpose AI (GPAI)** revealed ongoing ambiguity in distinguishing between **GPAI systems** and **GPAI models**, a theme that will likely require continued attention. **TSI/UNESCO Project – Training Competent Authorities** The now-concluding **TSI/UNESCO project** was recognised for its valuable contributions, especially in developing **practical training tools** for Competent Authorities. Of particular interest was an **incident response simulation exercise** designed from the perspective of a supervisory authority. NoBaReg discussed whether this kind of **hands-on, simulation-based training** could be adapted for implementation across other legislative frameworks beyond the AI Act.
Evaluation Study on EU Data Legislation – Presentation by Cap Gemini	**Hugh Gardner from Cap Gemini** presented the early-stage work on an evaluation study commissioned by the European Commission, covering three major legislative acts: the Free Flow of Non-Personal Data Regulation (FFDR), the Open Data Directive (ODD), and the Data Governance Act (DGA). These regulations aim to enhance trusted data sharing across sectors and Member States, contributing to the establishment of a single European data market. As the process is still in its initial stages, the presentation focused primarily on methodology and long-term objectives. The study will assess the effectiveness and benefits of each regulation and support the Commission with evidence for evaluation reports and any potential impact assessments or revisions. One key issue raised was the challenge of harmonisation between the ODD and the DGA, particularly due to observed differences in national implementation. Metadata compatibility between these acts and the INSPIRE Directive was also highlighted as a concern. NoBaReg members noted the lack of a consistent definition of "Open Data," which continues to cause confusion and may warrant further clarification in the evaluation. The group agreed to coordinate national input and consider areas for joint feedback.

Topic	-
Interoperable Europe Act – Presentation by Dennis Kruse Lund (DIGST)	**Dennis Kruse Lund** presented Denmark's approach to implementing the Interoperable Europe Act (IEA), which aims to embed "interoperability by design" into EU and national legislation, with a particular focus on enabling cross-border digital public services. Denmark is integrating Interoperability Assessments (IAs) into its legislative process through the "digitaliseringsklar lovgivning" framework. This ensures that IAs are triggered by new binding requirements, whether originating at the EU or national level. Of approximately 250 legislative proposals annually, around 40 to 50 are expected to require such assessments. A methodology is currently being developed to allow ministries to conduct IAs independently. Dennis also introduced the IOPA Traceability Platform, a project aimed at tracking interoperability requirements across the legislative lifecycle using the European Legislation Identifier (ELI). The project is supported by the Technical Support Instrument (TSI) and will run for approximately 18 months, with the goal of producing a model that could be adopted by other Member States. One of the challenges discussed was the distributed responsibility model, where ministries or legislative proposers must manage their own IAs. This makes coordination more complex. Resource limitations have also constrained Nordic cooperation, though Sweden has signalled interest in strengthening bilateral exchanges with Denmark. Action Point: Member countries are invited to share their national IEA contact persons with the PL to facilitate continued coordination.
SEMIC 2025 Planning – Presentation by Ida Kristine Fischer Thomsen and Nicolai Larsen (DIGST)	**Ida Kristine Fischer Thomsen and Nicolai Larsen** outlined the preliminary structure and themes for the upcoming SEMIC conference, which will span two days: the first with a technical focus, and the second dedicated to strategic and policy-level discussions. Key thematic areas for SEMIC include interoperability at both local and cross-border levels, the reduction of administrative burden, and the application of emerging technologies and AI in public administration. Additional focus will be placed on data reuse and openness, and the development of digital public infrastructure, with an emphasis on open-source solutions. For NoBaReg, several opportunities for engagement were identified. These include hosting a practical workshop session (approx. three hours), contributing to a panel discussion on Day 2, and exploring collaboration with the Polish delegation on the topic of machine-to-machine access. To move forward, a short concept note (1–2 pages) outlining proposed topics and session formats will be needed. Action Points: The PL will prepare draft proposals and coordinate directly with the SEMIC team. The group will need to align on themes and formats for NoBaReg's contributions in advance.

Wednesday 2. April

Data Act: Competent Authorities – Status Update on National Processes	Countries were invited to share the status of designating Competent Authorities (CAs) under the Data Act, based on discussions held at the Helsinki meeting and related homework materials.
	Countries provided updates on the designation of CAs under the Data Act, revealing a varied landscape of progress. Finland is among the most advanced, expecting to send legislation to Parliament within weeks, with Traficom likely to become the CA due to its central role under the DGA and involvement in the European Data Innovation Board (EDIB). In contrast, several countries remain in early stages. Lithuania has not designated a CA yet but is considering three options, including the current DGA CA, the authority for electronic communication services, and a provider of protected data; its DPA currently represents Lithuania in the EDIB, and further updates are anticipated soon. Latvia also lacks a decision, with eight authorities involved in ongoing discussions with the Ministry of Economy, and roles such as CA and Data Coordinator still undefined.
	Other countries report limited or delayed progress. Sweden has initiated a public inquiry into Data Act implementation, due to conclude in October, but it does not include a mandate to assess CA designation, and no candidates have been identified. Iceland remains far from designation, not yet part of the EEA agreement and lacking a dedicated digital authority—though the telecom authority is under consideration. Norway has yet to begin internal discussions, and the matter is not currently included in the relevant ministry portfolio. Denmark did not provide a specific update, and Åland noted that the complexity of the Data Act, composed of five separate legal acts, makes a quick response difficult.
Introduction to the JTC25, the group responding to DA Art. 34	Joint Technical Committee 25 (JTC25) started up in fall last year, and four working groups (WGs) were created to focus on specific areas:

(Adam Arndt - DIGST)	WG 3: Data Management and Data Governance: This group will tackle the remaining topics from the Standardization Request, focusing on DCAT, ontologies, and data management. WG 2: **Dataspaces**: This group will address topics specific to dataspace from the Standardization Request related to the Data Act and incorporate the findings from the CWA Trusted Data Transaction. WG 4: Cloud and Edge: This group will undertake preparatory activities for the anticipated Standardization Request in this area. WG 1: Advisory Group: This group will support collaboration among members and with relevant stakeholders, particularly the Focus Group on Data, Dataspaces, Cloud, and Edge. The basis for the ongoing standardisation work is Article 34 of the Data Act, which requires providers of data processing services to ensure interoperability for the purposes of in-parallel use of such services. Article 34 cross-references a broader set of obligations under Articles 23, 24, 25(2), and 30(2)– (5), which are to apply mutatis mutandis to relevant service providers. In response to the Commission's request for harmonised standards under the DA, the Joint Technical Committee 25 (JTC25) was established under CEN and CENELEC. Adam Arndt reported from this work, which he co-leads on the Danish side along with Martin Brynskov, who chairs the sub-committee for Smart Cities. The work of JTC25 is directly relevant to NoBaReg, as the harmonised standards developed through this process will enable a legal presumption of compliance with the Data Act. It was highlighted that the horizontal dimensions being addressed—such as Trusted Data Transactions, the Data Space Protocol, and DCAT (Data Catalog Vocabulary)—and explained the current focus on finalising the vocabulary as the first formal deliverable. The final set of data space-related standards is expected by the end of the year. However, the process is not without challenges. The standardisation process is driven largely by active contributors, raising concerns over the limited democratic oversight. There is notable corporate influence—particularly from large players like Microsoft—who have submitted extensive change requests that some see as slowing progress. Participation is also costly, with an estimated price tag of 25,000 DKK, and Nordic-Baltic coordination in this space remains limited. Another complexity lies in the dual structure of JTC25, which is split between national delegation-based participation and expert-based working groups. While the standards themselves are not legally binding, they carry significant weight by enabling compliance assumptions. This raises the bar for validating inputs, potentially requiring additional legal resources from participating Member States.

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	Lastly, a notable unresolved issue is the Commission's stance on public access to harmonised standards. Although a legal judgment has stated that these must be made freely available, the Commission has so far been reluctant to fund open publication, creating further uncertainty around access and implementation.

Deliverables	A budget of approximately 1 million DKK has been allocated for activities running until October 2026. Two structural approaches were discussed. The first would divide the funding into four sequential deliverables of around 250,000 DKK each. The preferred option, however, is to issue a single tender covering four distinct projects, each with its own timeline and outputs. Proposed themes for the work include the intersections between key EU regulatory frameworks, such as the DGA, DA, EHDS, AIA, and GDPR, as well as the legal-technical dynamics within emerging data spaces. Additional outputs may focus on increasing the initiative's online visibility, maintaining an updated registry of national contact points, and mapping governance boards and their overlaps—potentially aligning with upcoming TSI requirements. Sustainability beyond the project timeline was also discussed. Suggestions included publishing the names of national delegates for improved coordination and transparency, and ensuring all deliverables are designed for long-term value to avoid rapid obsolescence.