

Annotated agenda – Nordic-Baltic Working Group on EU Regulation (NoBaReg)

24. November 2025, Nordic House, Copenhagen

25. November SEMIC2025, Forum, Copenhagen

Participants:

Denmark	Lithuania	Nordic Council of Ministers
Finland	Norway	(Secretariat of HNG)
Iceland	Sweden	
Latvia	Aaland Island	

This annotated agenda combines agenda descriptions with brief summaries of discussions and agreed next steps, and is intended as both meeting documentation and a reference for future NoBaReg work”

Monday 24. November 2025	
Topics	Annotation
EDUS and digital omnibus	<p>EDUS and the Digital Omnibus – Annotated Agenda Text Introduction: EDUS and the Digital Omnibus as a Joint Policy Shift</p> <p>The presentation addressed two closely connected initiatives: the European Data Union Strategy (EDUS), published on 19 November 2025 as a Commission Decision, and the Digital Omnibus package. Together, these initiatives signal a significant restructuring of the EU’s data and digital regulatory framework. EDUS sets out a strategic vision for data use in Europe, while the Digital Omnibus translates parts of this vision into concrete legal consolidation, simplification, and amendment of existing legislation.</p> <p>The European Data Union Strategy (EDUS): Purpose and Structure EDUS is framed as a strategy for “unlocking data for AI”, with a particular focus on ensuring access to high-quality data, reducing regulatory complexity, and safeguarding European data sovereignty. The strategy is structured around three pillars, each addressing a different dimension of the EU’s data policy ambitions.</p> <p>Pillar I: Scaling Up Access to Quality Data for AI and Innovation The first pillar focuses on expanding access to data that can support AI development and data-driven innovation. Central to this pillar is the further development of European data spaces, with particular attention given to six data spaces considered to be of public interest, including</p>

health, mobility, media, legal data, the Green Deal, and defence. These data spaces are positioned as key infrastructures for sharing and reusing data across borders and sectors.

The presentation also introduced “data labs” as an emerging concept, positioned as a bridge between data spaces and AI ecosystems. Data labs are described as environments that provide technical infrastructure and tools for data pooling, pseudonymisation and anonymisation, synthetic data generation, data curation, labelling, and vectorisation. In addition to technical functions, data labs are expected to offer regulatory guidance and training, as well as support for facilitating access to data for AI use cases.

Further elements under Pillar I include strategic data assets, such as public-sector, scientific, cultural, and linguistic resources, and an increased emphasis on high-value datasets. Horizontal enablers such as standards, data pooling mechanisms, and synthetic data are highlighted as necessary supporting components.

Pillar II: Streamlining Data Rules – The Omnibus Dimension

The second pillar of EDUS focuses on streamlining and simplifying the EU’s data acquis and is closely linked to the Digital Omnibus package. The objective is to reduce regulatory complexity by deleting outdated rules, consolidating public-sector data-sharing provisions, and streamlining data-sharing obligations across legislation.

The presentation highlighted ambitions to modernise rules on cookies and similar technologies, develop a more innovation-friendly privacy framework, refine the Data Act to support practical implementation, and reduce administrative burdens for scaling companies. A recurring theme is the aim of making compliance easier, including the concept of “one-click compliance” and better tools to help businesses meet their obligations under EU data law.

Pillar III: Data Sovereignty and International Data Policy

The third pillar addresses the EU’s approach to data sovereignty in an international context. It focuses on ensuring fair cross-border data flows while safeguarding sensitive non-personal EU data. The strategy emphasises linking EU data-sharing ecosystems with those of like-minded third countries and strengthening the EU’s role and influence in global data governance discussions.

The Digital Omnibus: Overall Structure and Scope

The presentation explained that the Digital Omnibus consists of two parts: an AI Omnibus adjusting the AI Act, and a general Digital Omnibus that restructures several existing data-related legal instruments. The general Omnibus introduces substantial consolidation by moving or revoking provisions across multiple acts, including the Data Governance Act, the Open Data Directive, and parts of the Free Flow of Non-Personal Data Regulation.

The Omnibus also affects platform regulation and cybersecurity, with partial revocation of the P2B Regulation, changes to ePrivacy rules by moving cookie provisions into the GDPR,

facilitation of AI training under the GDPR, and the introduction of a single reporting system under NIS2.

Implications for the Data Act

Under the Digital Omnibus, the Data Act is adjusted and clarified in several areas. These include clarifications regarding the protection of trade secrets, a narrowing of the scope of Chapter V on public-sector access to private-sector data, and the removal of Article 36 on smart contracts. The presentation noted that national legislative consequences will need to be analysed in each Member State, while indicating that no immediate changes are expected in Denmark.

Implications for the Open Data Directive

The presentation explained that the content of the Open Data Directive is largely copied into the Data Act, almost on a one-to-one basis. As a result, rules on public sector information are consolidated into a single legal act rather than being spread across two instruments. The Open Data Directive itself is revoked, which will require adjustments to national legislation. Institutionally, the Open Data Committee is dissolved, and its tasks are transferred to the European Data Innovation Board (EDIB).

Implications for the Data Governance Act

Similarly, key elements of the Data Governance Act are moved into the Data Act. Chapter II on access to protected public-sector data is largely transferred, and notification of data intermediation services providers is made voluntary. The composition and tasks of the European Data Innovation Board are changed, and explicit requirements for EDIB subgroups are removed. The presentation noted that the broader institutional consequences, including the relationship to other EU bodies such as the EDPB and AI governance structures, are not yet fully clear. As with the Open Data Directive, the revocation of the DGA will require national legislative adjustments.

Concluding Perspective

The presentation concluded by highlighting that EDUS and the Digital Omnibus together represent a major consolidation and strategic reorientation of EU data law. The combination of strategic objectives, legal simplification, and institutional restructuring will have significant implications for national administrations, competent authorities, and cross-border coordination. These developments are therefore highly relevant for NoBaReg's ongoing work on understanding, coordinating, and supporting the implementation of EU digital regulation.

<p>Freedom of movement</p>	<p>Presentation by Mr. Petri Suopanki from Freedom of Movement Council</p> <p>The presentation provided an overview of the Nordic cooperation on freedom of movement, including its policy basis, governance structure, and current focus areas.</p> <p>It outlined freedom of movement as a core political objective in Nordic cooperation, aiming to make it easier for people and businesses to work, live, study, and operate across borders in the Nordic region. The presentation showed that a large share of Nordic policy areas and cooperation programmes are directly or indirectly linked to freedom of movement and the removal of cross-border obstacles.</p> <p>The presentation introduced the concept of “Freedom of Movement in the Nordics 2.0”, describing a planned increase in ambition for the period 2025–2030. This includes a stronger focus on results, clearer ownership, broader stakeholder involvement, and increased resources. Key actors highlighted included the Freedom of Movement Council, the Ministers of Co-operation, national authorities, and a wider ecosystem of local, regional, and national stakeholders.</p> <p>A central element of the presentation was the Freedom of Movement Council, described as an independent body that prioritises and proposes solutions to cross-border obstacles, while responsibility for implementation remains at national level. The importance of strong networks and coordination across governance levels was emphasised.</p> <p>The presentation also explained the process for handling cross-border obstacles, from identification to resolution, including the roles of political and operational promoters, quality assurance, and coordination bodies within the Nordic cooperation system.</p> <p>Finally, the presentation highlighted current obstacles and focus areas, including tax-related issues, cross-border statistics, pensions, crisis situations, digital identity matching, and population registration cooperation. Digitalisation and identity matching were presented as a joint focus area involving MR-DIGITAL, NOBID, MR-SAM, and the Freedom of Movement Council, with links to Nordic declarations and prime minister-level priorities.</p> <p>The presentation can be found in the attachments</p>
<p>SEMIC 2025 – 25. November 2025 09:00 – 13:00</p>	<p>NoBaReg arranged and participated in a workshop at the SEMIC2025 under the title “Semantic interoperability without borders: Real-world use cases from Europe”.</p> <p>Introduction to the workshop</p> <p>“When we chose to legislate less by directives and more by regulation, one of the reasons is the fear and experience of fragmentation. This fragmentation is regarding both implementation, interpretation and governance. Ideally, regulations should remedy the fragmentation of legal framework, as it is the same in all MS and EEA states.</p>

That said: Even with the regulations such as DGA, DA and the AIA, there are topics that are up to MS to decide and implement: What competent body should be in charge, what fines do we impose, and when, as a question of governing and regulating through legislation.

NoBaReg contributes to the participating countries' national digitalisation efforts by facilitating knowledge sharing, exchange of experiences and discussions on common approaches to implementing EU regulation in the data area. NoBaReg supports and coordinates the national implementations of EU regulation in the data area with a central focus on the Data Act, the Data Governance Act, the Open Data Directive, and the Interoperability Regulation. NoBaReg facilitates and supports the countries' exchange of views and ideas on possible collaboration and coordination on implementing relevant regulations. NoBaReg is also providing an area for dialogues on the integration and improvement of existing data-oriented EU regulation.

In this session at the SEMIC2025, NoBaReg invited participants in a dialogue driven by practical and pragmatic speakers and exercises to learn more about how to cooperate between disciplines, departments, MS and bilaterally outside of the EU.”

The workshop included the Nordic Council of Ministers, NoBaReg, Nobid and the Finnish OOTS 2.0 Project - Smarter Cross-Border Digital Services in the Nordic-Baltic Region.

All presentations can be found in the attachments.

During day two of SEMIC2025, the three projects financed by the Nordic Council of Ministers, had a stand at the conference's exhibition area. The brochures for the three projects are attached.

Attachments:

From the meeting:

[NoBaReg Presentation Freedom of Movement in the Nordics](#)

From the work shop:

[Nordic Council Of Ministers, SEMIC 2025](#)

[OOTS 2.0 Project - Smarter Cross-Border Digital Services in the Nordic-Baltic Region](#)

[NOBID Presentation, SEMIC 2025](#)

[NoBaReg at SEMIC 2025](#)

From the exhibition:

[NOBID Nordic-Baltic eID Project](#)

[Nordic-Baltic Working Group on EU Regulation NoBaReg](#)

[OOTS 2.0 Project Smarter Cross-Border Digital Services in the Nordic-Baltic Region](#)