

Regulatory Reporting PRINCIPLES

Join our Regulatory Reporting Community of Practice here





This study was carried out by Wavestone for the Legal interoperability action of the ISA² programme by:

WAVESTONE

Authors:

Monica ADAMI

Patricia BACHMAIER

Barbora KUDZMANAITE

Alessandro ZAMBONI

Disclaimer

The information and views set out in this publication are those of the author(s) and do not necessarily reflect the official opinion of the Commission. The Commission does not guarantee the accuracy of the data included in this study. Neither the Commission nor any person acting on the Commission's behalf may be held responsible for the use which may be made of the information contained therein.

© European Union, 2020





TABLE OF CONTENTS

IS YOUR REGULATORY REPORTING CLEAN AND HEALTHY?

A	LOO	K AT CHALLENGES AND PRINCIPLES	4
1.	. RE	GULATORY REPORTING PRINCIPLES	6
	1.1	FIT FOR PURPOSE	7
	1.2	COHERENT	8
	1.3	CLEAR1	0
	1.4	TECHNOLOGY-DRIVEN	1
	1.5	INTEROPERABLE	13



Is your regulatory reporting clean and healthy? A look at challenges and principles

The regulatory reporting process is an integral part of ensuring the implementation of European legislation. The main purpose of regulatory reporting is to collect data from concerned reporting parties (Member States or businesses) that is required under European legislation, in order to check the compliance of the concerned stakeholders (private or public entities)¹. Furthermore, the gathered data has the potential to be used for the following: evaluate the effectiveness and efficiency of a Directive or a Regulation; serve as an evidence base for new EU policy development; inform the public of the state-of-play of EU legislation implementation; or analyse risks in a specific domain².

For the purpose of this issue paper, regulatory reporting is defined as presented in Table 1.

Table 1 Regulatory Reporting Definition

Regulatory reporting is the provision of periodical structured or unstructured data (qualitative or quantitative) from concerned private and public organisations, to competent authorities (at EU or national level) as required by the requirements set in specific EU legislation³.

It is a process, which entails the following main stages: the setting of regulatory reporting requirements in EU legislation, data acquisition, data processing and data sharing. These stages involve both the European Commission and officers within its Agencies dealing with reported data, as well as the parties which will be submitting data.

The first stage of regulatory reporting, which focuses on the setting of regulatory reporting requirements, has implications for all subsequent stages and for the quality of the data that is collected. Hence, it is crucial to ensure that the regulatory reporting requirements are clearly set and they

¹ Case study analysis of regulatory reporting practices across the European Commission. Page 58.

Available at: https://op.europa.eu/en/publication-detail/-/publication/5a5e5b13-e996-11e9-9c4e-01aa75ed71a1, accessed on September 23 2020

² Case study analysis of regulatory reporting practices across the European Commission. Page 6, available at: https://op.europa.eu/en/publication-detail/-/publication/5a5e5b13-e996-11e9-9c4e-01aa75ed71a1, accessed on September 23 2020

³ Case study analysis of regulatory reporting practices across the European Commission. Page 6.

Accessed on September 23 2020. https://op.europa.eu/en/publication-detail/-/publication/5a5e5b13-e996-11e9-9c4e-01aa75ed71a1



mandate the gathering of only the data that is necessary for the process, taking account of data or information already collected, which minimizes administrative burden⁴.

This ambition is also confirmed when we look at the main challenges associated with the regulatory reporting process. These can be summarised as follows⁵:

- Unclear regulatory reporting requirements set out in the legislative text;
- Complexity of both setting the regulatory reporting requirements and those of the following stages to collect, process and report data.

The consequences of these challenges, if not tackled, can be burdensome and counterproductive: multiple reporting, poor interoperability across data sets, poor quality and reusability of the data collected and inconsistent reporting timelines, among others. Additionally, these consequences may result in a waste of resources of all parties involved, while still offering a non-optimal result. Failure to identify synergies with other units, European Commission services, and Agencies leads to missed opportunities and unnecessary burdens on public and private organisations in the EU Member States⁶.

In the light of all this information, several colleagues from Directorate-General (DG) for Informatics (DIGIT), DG Environment (ENV), DG for Health and Food Safety (DG SANTE), DG for Financial Stability, Financial Services and Capital Markets Union (FISMA) and Secretariat-General (SG) set out to establish a Regulatory Reporting Community of Practice in late 2019. They were driven by a shared belief that there is room to streamline the regulatory reporting process in the European Commission and its Agencies. More concretely, they believe that there are significant benefits to be reaped from establishing synergies between DGs and Agencies involved in the process. This Community of Practice will serve as a place where policy, legal and IT officers involved in the regulatory reporting process can come together to exchange best practices, share ideas and find relevant resources.

Looking at the challenges associated with the regulatory reporting process, they appear to be universal across all parties involved in the process. Therefore, as an initial input for the community of practice, this issue paper puts forward **principles for setting regulatory reporting requirements.** The focus of the principles is on the first stage of the regulatory reporting process due to the significant impact that it has on all subsequent stages. The proposed principles in this paper address the two abovementioned challenges, namely lack of clarity and increased complexity.

After a thorough analysis of documents from the European Commission and its Agencies, Fitness Checks, and consultations with colleagues from several DGs, **five principles for setting regulatory reporting requirements** have been identified. Each principle is accompanied by best practices and an overview of the issues that it aims to tackle.

⁴ For instance, fragmented approaches lead to the impossibility of cross-reading data collected for reporting and pooling them together, resulting in no valuable output. This implies a waste of effort and time from all the stakeholders involved in the process. DG ENV interview 2020. Page 4.

⁵ E.g. Actions to Streamline Environmental Reporting; Final Report Fitness Check & Evaluation - DG ENER; A European strategy for data, among others.

⁶ The strategy pointed out the gathering of data low in interoperability and quality as a recurrent issue. Source: COM/2020/66 final, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS A European strategy for data, Brussels 19.2.2020.



It is important to bear in mind that the approach to these principles is holistic yet detailed and practical for the parties involved. In particular, the principles are aimed at guiding policy and legal officers across the European Commission and its Agencies when designing and setting regulatory reporting requirements in EU legislation.

If you find this issue paper compelling, or have additional thoughts on the topic you would like to share, join the Regulatory Reporting Community of Practice <u>here</u>. You will also find more information on the topic and have the opportunity to pose questions and share your insights.

1. Regulatory Reporting Principles

When setting regulatory reporting requirements, one should ensure that the resulting requirements and data gathered are **fit for purpose**, **coherent**, **clear**, **technology-driven** and eventually **interoperable**.

In the following section, each of the principles is accompanied by a detailed description of its meaning, a practical example, the challenges it aims to address and a list of potential best practices. The principles relate to one another; hence some address the same challenge from a different angle and/or complement other principles. Taken together, these principles contribute towards a streamlined regulatory reporting process and interoperability of the gathered data.

The regulatory reporting principles are summarised in Figure 1 and further detailed below.

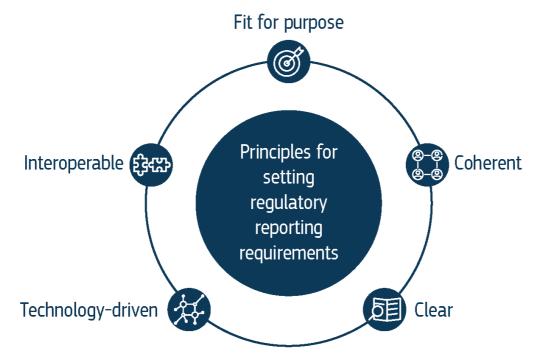


Figure 1 Snapshot of the regulatory reporting principles





1.1 Fit for purpose

What is it about?

A regulatory reporting requirement being fit for purpose implies that it should be well aligned with the needs of broader policy objectives, ensuring that only the necessary data is collected in order to feed the policy cycle. This includes anticipating the data needed to be able to conduct an evaluation in line with the Better Regulation guidelines. At the highest level, the regulatory reporting requirements should be in line with the European Commission's Communication *A European strategy for data* ⁷ and ultimately with any other ongoing or upcoming policy initiatives in the specific domain. The purpose of the gathered data should be decided upon with the key reporting actors when setting regulatory reporting requirements, as well as with key industry stakeholders when pertinent. The feasibility of the planned reporting requirements as well as the appropriate timing of reporting should be checked in the design phase too. This will help to avoid requesting unnecessary data and will contribute to the reduction of administrative burden (internally and externally).

For example, stakeholders from DG ENV have emphasised that due to disparate calendars, there is a large gap between the time in which data is collected and when it is used as evidence to inform policy making. This implies that frequently, the information is outdated and irrelevant. For that reason, DG ENV stressed the need for harmonisation of the policy and the reporting calendars to ensure that the purpose for which data will be collected is closely aligned with the policy objectives⁸.

Challenges addressed

- <u>Lack of awareness of the broader EU policy objectives:</u> officers setting regulatory reporting requirements are not aware of the broader EU policy objectives, which results in missed opportunities to gather relevant data or in asking twice for the same information⁹.
- Short-term thinking for long-term data, which results in unusable data: officers responsible for setting regulatory reporting requirements do not think through the long-term purpose and the right timing of the data to be reported, resulting in limited usability of the data collected¹⁰.
- Administrative burden on the reporting parties: it often happens that DGs request more regulatory reporting data than needed and at different timeframes, which results in an unnecessary administrative burden for the reporting parties and the requesting stakeholders.

⁷ COM/2020/66 final, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS A European strategy for data, Brussels, 19.2.2020.

⁸ DG ENV interview 2020. Wavestone. Page 4.

⁹ DG MOVE. Interview 2020. Wavestone. Page 5.

¹⁰ Final Report Fitness Check & Evaluation – Trinomics, available at: https://ec.europa.eu/energy/sites/ener/files/documents/final_report__fitness_check_evaluation_and_ia_18072016_final.pdf. Page 135-136.



Best practices to follow

- ✓ Identify the purpose and objectives of the data collection exercise. The resulting regulatory reporting requirements should be traced to those goals to ensure that they are fit for purpose.
- ✓ Ensure that the reporting requirements provide relevant information for effective regulatory monitoring and reporting.
- ✓ In line with above, aim to the extent possible to synchronise the timing of regulatory data collection with broader policy developments and data collection exercises at the DG or related policy domains early on in the process, so as to guarantee the usefulness of collected data.
- Ask only for the required data that are necessary in a particular policy area, i.e. ensure that the EU principle of proportionality is respected. The proportionality principle means that, to achieve its aims, the EU will only take the action it needs to, and not more¹¹. By being very specific on the type of data that needs to be collected, one can ensure that reporting parties will not need to report data that is non-essential. This will help to avoid additional administrative burden.
- Ensure that the legislation setting regulatory reporting requirements allows for the future reuse of collected data for other purposes and different policy domains and by other DGs within the European Commission.



1.2 Coherent

What is it about?

A coherent regulatory reporting requirement implies that policy officers setting up regulatory reporting requirements should aim to ensure the coherence of those requirements with each other and with those already existing in the same or other domains. Coherence will help to guarantee the most effective and efficient process possible. This entails proactive coordination and cooperation with stakeholders involved in the different regulatory reporting stages and policy domains and with policy officers responsible for parallel reporting flows. This will help to avoid duplicated or overlapping requirements and ensure consistency of the data collected.

Following the coherence principle when setting up regulatory reporting requirements will also help to implement the once-only principle¹². By mapping existing reporting requirements, available data will be reused to the greatest extent possible. In addition, better coherence between DGs will help to ensure

Accessed on September 24 2020.

¹¹ Glossary. European Commission.

 $https://ec.europa.eu/regional_policy/en/policy/what/glossary/p/proportionality\#: \sim : text = Proportionality\%20 regulates\%20 how\%20 the\%20 European, needs\%20 to\%20 and\%20 no\%20 more.\\$

¹² The **Once Only Principle** entails that citizens and businesses provide diverse data **only once** in contact with public administrations, while public administration bodies take actions to internally share and reuse these data – even across borders – always in respect of data protection regulations and other constraints. More information is available at:

https://ec.europa.eu/cefdigital/wiki/display/CEFDIGITAL/Once+Only+Principle#:~:text=The%20Once%20Only%20Principle%20entails,protection%20regulations%20and%20other%20constraints, last accessed on 24/09/2020.



that the collected data is of the right granularity, accompanied with appropriate metadata and hence can be reused in other policy domains.

For example, the EEA offers a practical approach to ensure the coherence of regulatory reporting requirements. The Agency has put a data governance model in place, appointing one dedicated Data Manager per each data flow, who is responsible for the coordination and communication with the concerned external parties. This helps to ensure that there is no duplication of data, and that the external and internal stakeholders are aligned in their understanding and needs for regulatory reporting requirements. In addition, the Data Manager tracks and notifies the concerned parties of what and when they need to deliver¹³.

Additionally, DG FISMA has completed a Fitness check on <u>EU supervisory reporting requirements</u>, which concluded that there is a need to improve coherence between reporting requirements in the financial domain. Consequently, DG FISMA reacted to the Fitness Check by launching several initiatives aiming to avoid duplication of frameworks¹⁴.

Challenges addressed

- <u>Lack of overview of reporting requirements across EU law:</u> for instance, policy units/officers are not always aware if specific data has already been reported through other means, which may result in duplicated or multiple reporting.
- Overlapping reporting requirements for the reporting parties, resulting in duplicated reporting
 requirements: several stakeholders have pointed out that the reporting parties have to report
 the same type of data to different organisations, although with different frequencies and slight
 changes in the format, thus demanding a greater effort for all parties involved.
- <u>Lack of coherence in timing:</u> there are several reporting requirements on similar topics that have different deadlines for submission, leading to different data and therefore different results¹⁵.
- Work in silos: due to a lack of communication and/or coordination between policy, legal and IT officers setting regulatory reporting requirements, there are missed opportunities for data reuse¹⁶.
- Lack of a coordinated infrastructure to identify cases of duplicated or multiple reporting.

Best practices to follow

Implement oversight of all data requirements for a specific thematic policy area to see whether the necessary data is already available.

¹³ EEA Interview 2020. Wavestone. Page 4.

¹⁴ For more relevant information on coherence, relevance, efficiency, efficacy, and other helpful concepts, the reader can find useful knowledge on DG FISMA's conclusions on its "<u>Fitness check of EU supervisory reporting requirements</u>" from 2018-2019.

¹⁵ Final Report Fitness Check & Evaluation - Trinomics, available at: https://ec.europa.eu/energy/sites/ener/files/documents/final_report__fitness_check_evaluation_and_ia_18072016_final.pdf . Page 138.

¹⁶ Ibid. Page 135 – 136.



- √ Coordinate with other units or DGs working with similar requirements to streamline and exchange reported data and avoid duplicated or multiple reporting.
- Consult data catalogues for existing data and share new collected data in those catalogues. Some sources of data to be reused can be found in catalogues such as the European Data Portal¹⁷, Copernicus data platform¹⁸ and the JRC Data portal¹⁹.
- Involve the key stakeholders (policy, IT, legal officers and those representative of significant reporting parties) at an early stage of the process. This will help to ensure that synergies can be built, data that could be reused is identified, any potential shortcomings of the requirements are addressed upfront, and potential future collaboration opportunities are identified.
- Set up a data governance structure with dedicated Data Managers responsible for a specific data flow and ensuring coherence and coordination with other Data Managers.
- Consider conducting a fitness check on monitoring and reporting requirements across a given policy area to identify outdated or duplicated requirements and identify potential for administrative burden reduction and for better coherence and synergies (cfr environmental monitoring and reporting fitness check). This could inform possible targeted amendments of existing legislation.



1.3 Clear

What is it about?

A clear regulatory reporting requirement implies that it should be clearly expressed – explaining its purpose and process and supported by reporting guidelines and templates, where relevant. This will help to reduce the administrative burden on parties submitting the data, ensure that reported data is of a high quality and hence requiring less *ex post* processing, and ensure that the reported data is easily reusable.

Some stakeholders have already seen the benefits of applying the clear principle. By distributing templates to the reporting stakeholders to guide their submission of data, DG MOVE ensured that respondents had a straightforward idea of what data content was expected from them, and in which format.²⁰

-

¹⁷ https://www.europeandataportal.eu/data/, last accessed on 24/09/2020.

¹⁸ https://www.copernicus.eu/en/access-data, last accessed on 24/09/2020.

¹⁹ https://data.jrc.ec.europa.eu/, last accessed on 24/09/2020.

²⁰ DG MOVE. Interview 2020. Wavestone.



Challenges addressed

- <u>Lack of guidance and details on regulatory reporting requirements which results in poor quality of gathered data²¹; for instance, when the legal provisions defining the reporting requirements are not clear²², it hinders harmonized reporting²³.</u>
- Divergence of reporting across Member States or other entities can be a result of mixed regulatory reporting requirements. For example, sometimes the reporting organisations are obliged to submit the same data, with small variations on the format, to different bodies and with different frequency, making it burdensome and confusing for the reporting parties.
- Resource-intense data processing: officers setting regulatory reporting requirements sometimes do not specify the format in which data is to be reported. This results in a burdensome data processing and limited reusability of data. Additionally, reporting parties may not submit all the necessary data because it is too complicated for them to understand what needs to be reported.
- <u>Lack of semantic interoperability</u> resulting from the use of inconsistent terminology, the same concept being named differently. This contributes to low reusability of data.

Best practices to follow

- ✓ Provide clear guidelines for reporting parties on how to implement reporting requirements set in a specific legislation. The guidelines should be sufficiently detailed, defining the key data, formats, means to report and timelines.
- ✓ Use clear language and consistent terminology in the reporting requirements, reporting templates and guidelines.
- Set up a data governance team which would be available to provide support to the reporting parties, remind them of upcoming deadlines and answer any requests related to data that needs to be reported.



1.4 Technology-driven

What is it about?

A technology-driven regulatory reporting requirement implies that, where possible, officers setting regulatory reporting requirements should collaborate with the IT officers who will be involved in handling reported data at the early stage of requirements setting, and rely on IT systems when beneficial. This will help refine and formulate regulatory reporting requirements more clearly, identify any IT systems that could potentially be used to support the reporting process and define together system related requirements in the legal text, ensuring that it allows for sufficient flexibility for efficient IT development. The use of innovative approaches (e.g. pulling data from its source automatically), as

²¹ Final Report Fitness Check & Evaluation - DG ENER. Page 62.

²² Review of NIS Directive Intermediate Workshop. Page 20.

²³ DG MOVE Interview 2020. Wavestone. Page 4.



well as new and emerging technologies (i.e. Artificial Intelligence (AI) and sensor technology) should also be considered to the greatest extent possible when defining the regulatory reporting process.

For instance, DG for Energy (ENER) is aiming to simplify the reporting process through the use of IT tools by developing an e-Platform for the implementation of Regulation on Governance of the Energy Union and Climate Action, which can ease the streamlining of the process²⁴. To ensure that the developed e-Platform meets stakeholders' needs and that the regulatory reporting requirements set out in the Regulation are well formulated, policy officers at DG ENER collaborated closely with the IT units in their DG.

Similarly, DG SANTE is currently expanding its Data Collection Platform²⁵ to cover data coming from other regulatory reporting requirements in place at the DG, such as those laid out in the Official Controls Regulation²⁶. To ensure the success of this transition, DG SANTE's policy units work in close collaboration with the Information System Unit, the Unit responsible for the platform.

Challenges addressed

- <u>Work in silos:</u> IT officers are often only involved in the regulatory reporting process when it comes to handling and visualising reported data. However, they have knowledge and expertise that could help to streamline the regulatory reporting process.
- Slow integration of new technologies. Due to the novelty of new technologies, several challenges arise; it takes time to change reporting culture and shift to a new way of data collecting and analysis. Additionally, the process of setting the appropriate legal framework for data collection using such technologies also takes time as several questions about data harvesting and storage need to be addressed (i.e. where to store reporting obligations, how to address published data, personal data protection etc.).
- Low awareness of IT solutions supporting regulatory reporting: lack of awareness of existing technologies for reuse and opportunities to innovate, which stems from low awareness and exchange of information between concerned DGs, within units, and agencies²⁷.

²⁴ OJ L 328, Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (Text with EEA relevance.), 21.12.2018, p. 1–77

²⁵ Available at: https://webgate.ec.europa.eu/sante-xmlgate/#!/

²⁶ OJ L 95, Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation)Text with EEA relevance. 7.4.2017, p. 1–142

 $^{^{\}rm 27}$ Final Report on Regulatory Reporting. Page 60.



Best practices to follow

- Involve the IT officers who will be handling reported data early in the process. They will be able to advise on how to ensure that the resulting regulatory reporting requirements reflect the IT implementation needs, that data is requested in the correct formats and that any supporting IT tools are identified early in the process.
- ✓ Aim to identify potential IT tools to be used for regulatory reporting at the early stage of requirement setting to ensure that the process is automated to the greatest extent possible.
- √ Be open to innovation, even if it takes resources to implement changes. The new ways to gather data, such as using sensor data, and new ways to analyse data by harnessing AI help to significantly simplify the process of regulatory reporting.
- ✓ Support for the use and development of machine-readable requirements, as well as RegTech²⁸ and SupTech tools²⁹.



1.5 Interoperable

What is it about?

Interoperability (see definition³⁰) is at the core of a smooth regulatory reporting process. The abovementioned principles all contribute in their own way to fostering interoperability: the technology-driven principle relates to technical interoperability, the importance of ensuring coherence through coordination links to organisational interoperability, and clear requirements foster legal interoperability. However, semantic interoperability is at the core of regulatory reporting as it concerns smooth data exchange, relying on the use of common definitions and concepts among stakeholders. This principle implies that the data being collected follows European or international standards and specifications of data classification, and is accompanied by high-quality metadata. The accompanying metadata should be accurate, available, complete, conformant, consistent, credible, processable, relevant and timely³¹. This will enhance data portability³² and reusability.

A practical example of interoperability is the use of data dictionaries in the European Food Safety Authority (EFSA): by understanding how the data items are named in the different Member States,

²⁸ Regtech is the management of regulatory processes within the financial industry through technology.

²⁹ Suptech refers to the use of innovative technology such as artificial intelligence and machine learning by supervisory agencies to support supervision.

³⁰ Interoperability is defined as the ability of organisations to interact towards mutually beneficial goals, involving the sharing of information

and knowledge between these organisations, through the business activities they support, by means of the exchange of data between their ICT systems.

COM(2017) 134 final, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS European Interoperability Framework – Implementation Strategy, Brussels, 23.3.2017.

³¹ European Data Portal, Training Module 2.2.Open Data & Metadata Quality, 2014, available at: https://www.europeandataportal.eu/sites/default/files/d2.1.2_training_module_2.2_open_data_quality_en_edp.pdf, last accessed on 24/09/2020.

³² Data portability is the right to transfer personal data from one organisation (controller) to another organization, or to the data subject in the context of digital personal data and automated processing.



EFSA is capable of mapping, filtering and aggregating the data with the right classification, ensuring valuable reuse of the information³³.

Challenges addressed

- Incomparability of data: data is not comparable or cannot be aggregated when the data needs and specifications have not been thought of in the design stage (resulting in uneven formats of data)³⁴. It may also occur when the legal provisions setting up the reporting requirements are not specific enough, hence resulting in Member States reporting different types of information, with different levels of granularity and at different frequencies³⁵.
- Poor potential for reuse of data or poor reuse of the data: there is a low reuse of existing data from EU sources (such as data gathered by the Copernicus project³⁶ in the environmental domain) or directly from the public (e.g. in the context of citizen science) due to differences in data formats and low levels of awareness³⁷.
- <u>Mixture of regulatory reporting requirements:</u> the same stakeholders must report the same information twice to different parties. This can be caused by a lack of synergies due to the failure to communicate between concerned DGs and Agencies, or to different data formats³⁸.
- <u>Impossibility to cross-read data and pool it</u>: it can be burdensome for those processing the data to do so due to an absence of standards for the formats of the reporting requirements³⁹.

Best practices to follow

- Map existing national data structures and compare them before setting specific reporting procedures, specifications or standards; for instance, the SIGMA project aims to ensure interoperability by mapping all the national data structures to the common SIGMA Animal Disease Data Model σ -ADM model⁴⁰.
- √ Create or leverage on existing data dictionaries to achieve a more complete and flexible
 harmonisation of reporting; as an example, the harmonised SIGMA Animal Disease Data
 Model was conceived to gather data, where possible, from existing data collection systems
 that were already in place⁴¹.

³³ EFSA interview. Wavestone.

³⁴ DG SANTE Interview 2020. Wavestone.

Final Report Fitness Check & Evaluation - DG ENER. Page 62.

³⁵ DG MOVE Interview 2020. Wavestone. Page 4.

³⁶ More information at: https://www.copernicus.eu/en

³⁷ COM(2017) 312 final , REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS, Actions to Streamline Environmental R actions to Streamline Environmental Reporting, Brussels, 9.6.2017, Page 4.

³⁸ Ibid. Page 60.

³⁹ Ibid. Page 60.

⁴⁰ EFSA. SIGMA Animal Disease Data Model. Accessed 15 August 2020.

Available on: https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2019.5556

⁴¹ Case study analysis of regulatory reporting practices across the European Commission. Publications Office. Page 55. Accessed 15 August 2020.Available on: https://op.europa.eu/en/publication-detail/-/publication/5a5e5b13-e996-11e9-9c4e-01aa75ed71a1



Provide common templates and controlled vocabularies for submitting regulatory data to national or European regulators in order to ensure that the data is comparable and reusable. Ensure that reporting parties follow these common rules.



Join our Regulatory Reporting
Community of Practice
here

