NAPCORE strategic position and common strategy for EU policies and developments

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Abstract

The aim of the document is to give an overview of priorities and planned actions of NAPCORE regarding EU policies and developments. This report includes three parts:

1) An overview table of EU policies and strategies including a short description as well as a short statement on the relevancy for NAPCORE. Each policy has a priority value calculated based on values of impact and urgency.

2) For the topmost policies dedicated actions that we as NAPCORE plan on taking up regarding these policies.

3) The NAPCORE Statement Paper on the ITS Directive revision

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Abbreviations

Abbreviation	Meaning
AFIR	Alternative Fuels Infrastructure Regulation
CAT	Core Alignment Team
C-ITS	Cooperative Intelligent Transport Systems
EC	European Commission
EPICS	European Platform on ITS and C-ITS Services
ITS	Intelligent Transport Systems
MDMS	Multimodal Digital Mobility Services
MMTIS	Multimodal Travel Information Services
NAP	National Access Point
NAPCORE	National Access Point Coordination Organisation for Europe
NB	National Body
NIS	Network and Information Security
RTTI	Real Time Traffic Information
SC, SCOM	Steering Committee
SCS	Steering Committee Support
SRTI	Safety Related Traffic Information
SSTP	Safe and Secure Truck Parking
SWG	Sub-working Group
TEN-T	Trans-European Transport Network
WG	Working Group
WG1	NAPCORE Working Group 1 "NAP & NB Platform Strategy and Governance"
WP	Working Programme

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Overview of this document

NAPCORE's WG 1 is called "NAP & NB Platform Strategy and Governance" and is tasked with defining NAPCORE's strategic position and common strategy for EU policies and developments. This is the 2022 version of a report that documents the working group's work results so far. As there are many policies to consider and there are constant developments over time which need to be considered the document is meant and planned to be a "living document" with fixed iterations at the end of the years 2022, 2023 and 2024.

The definition and agreement on common NAPCORE strategic positions is dependent on the individual EU policy or development looked at, so an individual approach needs to be found for each. For this first year's version a lot of preparatory work has been done, like identifying relevant EU policies and developments, analysing them and prioritizing them. Only for the topmost prioritized item (the ITS Directive with its revision) a common statement paper as NAPCORE positioning has been achieved.

This document has three sections that, in combination, form the first iteration of the NAPCORE position and strategy as well as future activities to develop coordinated NAPCORE strategies towards EU policies and actions. The three sections of this document are as follows:

1. Prioritised list of EU policies with their impact/urgency on NAPCORE:
   This list contains those EU policies and developments at EU level that are most relevant to NAPCORE.
2. Actions for the highest prioritised policies and developments:
   For those policies and developments ranked highest in the overview list in the first section, actions are listed that WG1 is planning for 2023 in order to create a common position and strategy. For those policies and developments in the list that are closely related, action groups were defined.
3. Coordinated NAPCORE Statement Paper on the Revision of the ITS Directive:
   One NAPCORE-harmonised position was coordinated in 2022: a NAPCORE statement paper on the revision of the ITS Directive. This document is provided as part of this milestone report in the annex.

1. Prioritized list of EU policies and developments

1.1. Methodology

The following methodology was used by WG1 to create a prioritized list of EU policies and developments:

1. Identification phase

In a first step all active partners named and listed those EU policies and developments that in their view had some relevance to the NAPs and thus potentially NAPCORE. All named policies and developments were gathered in a shared spreadsheet document on the NAPCORE SharePoint server. Duplicates were removed.

2. Rapporteur phase

For each line in the list, one or two rapporteurs have been designated. Their task was to read and review the available texts and possibly secondary information on it and fill in to the table a description of the policy or development and a summary of the of the relevancy for the NAPs and NAPCORE. Outcomes have been presented in working group meetings.

3. Scoring phase

The rapporteur also, from their subjective perspective, scored in a first go their designated EU policy/development for its "Importance or Impact" for NAPs and the "Urgency to act" for NAPCORE. For this the following scales were used:

Importance / Impact	Urgency to act
0 - not important, no impact	0 - no need to act
1 - hardly important, almost no impact	1 - currently no need to act, possibly later
2 - low importance, little impact	2 - action can wait but should not be forgotten
3 - little importance and impact	3 - action some time later advisable
4 - quite important and more than a little impact	4 - action sometime soon could beneficial
5 - important and medium impact	5 - action soon would be beneficial
6 - more important and more impact	6 - action soon is called for
7 - very important and considerable impact	7 - quite urgent action needed
8 - high importance and high impact	8 - action urgently needed
9 - very high importance and very high impact	9 - action very urgently needed
10 - extremely important and highest impact	10 - immediate action required

These scores were then reviewed and discussed in several WG1 meetings, and if contested, changed according to general consensus among participants.

4. Priorisation

Lastly a priority index was calculated by multiplying the impact value (1-10 from lowest to highest impact) with the urgency value (1-10 from no urgency to very urgent). The resulting calculated priority is given, with its individual impact and urgency factors, in the overview list and has been used for ordering to rank the list from topmost to least prioritised.

1.2. Results of the priorisation

Calculated Priority (Impact x Urgency)	Name of Policy/Strategy	Short description	Relevancy for NAPCORE
81 (9 x 9)	ITS Directive 2010/40/EU (incl. Revision 2022)	Framework for the deployment of several ITS areas, which gave rise to the deployment of NAPs.	The ITS Directive is the foundation upon which both the National Access Points and the National Bodies (NB) have been established. Any revision of the ITS Directive will likely have a big impact on the role, tasks, responsibilities, requirements, mandates and more of both the NAPs and NBs - at least on a higher level (=> not as concrete and in high detail as the Delegated Regulations under the ITS Directive).
80 (10 x 8)	MMTIS, Delegated Reg. (EU) 2017/1926 (incl. revision 2022)	Provision of EU-wide multimodal travel information services using the NAP. The Delegated Regulation (EU) 2017/1926 on EU-wide multimodal travel information services establishes the necessary specifications to ensure that multimodal travel information services are accurate and available across borders to users.	Highly relevant for NAPCORE because the transport authorities, transport operators, infrastructure managers or transport on-demand service providers should make the static and dynamic data, corresponding metadata and information on the quality of the data accessible to users through a national or common access point.
70 (10 x 7)	RTTI, Delegated Reg. (EU) 2015/962 (incl. revision 2022 - new designation is 2022/492)	Provision of EU-wide Real Time Traffic Information services - road transport and its interfaces with other modes of transport	The Commission has established this act with a view to improving the accessibility, exchange, re-use and update of data required for the provision of high quality and continuous real-time traffic information services across the Union. It is highly relevant for NAPCORE because the deployment of ITS accelerates across the Union, it requires

			continued support in the form of increased and seamless access to existing and new data types relevant to the provision of real-time traffic information services, with a higher geographical coverage. Since all roads (except for small private roads) are included, and for some data categories already applicable from 1st of January 2025 it is important that NAPCORE well in advance has described rules for data quality, metadata descriptions etc., in order to ease the process and make sure that data owners exert their time correctly from the start and in this that we align with what market parties find relevant, so they will be able to deploy the RTTI services.
64 **(8 x 8)**	Mobility Data Space	The creation of a Mobility Data Space is mentioned in several EU policies (Green Deal, Strategy for Data, Staff working document on data spaces, New EU Urban Mobility Framework, ...), so it can be regarded as an overarching goal and policy action.	Highly relevant for NAPCORE, as the NAPs are playing (need to play, should play...) a vital part within (or in relation to) the European Mobility Data Space. NAPCORE should work on a common position of NAPs within the MDS, making sure the NAPs find a place and are compatible technically. Communication of MDS and NAP roles is super important as to not confuse data providers, users, the mobility data community.
60 **(10 x 6)**	SRTI, Delegated Reg. (EU) 886/2013	This DR is supplementing the ITS Directive 2010/40/EU and is a further elaboration of Action C mentioned in the ITS Directive: data and procedures for the provision, were possible, of road safety related minimal universal traffic information, free of charge, to users.	* Obligation to share data on the eight SRTI categories, both on public and private side, via a NAP * Privacy regulations mentioned in the DR must be met * DATEX II is the standard * Compatibility, interoperability and continuity are crucial. Here lies an important role for NAPCORE in coordination and standardisation.
49 **(7 x 7)**	Cybersecurity Act (Regulation 2019/881)	Information and communications technology cybersecurity certification	Relevance for NAPCORE security in two aspects: It sets the scope and governance of ENISA, who is the central EU cybersecurity authority This regulation also sets requirements for cybersecurity certification, which national authorities will have to follow for NAP implementation and operation

49 (7 x 7)	NIS Directive (incl. revision 2022)	Measures for a high common level of security of network and information systems across the Union	For the sector of transport Member States shall identify the operators of essential services with an establishment on their territory. An operator of essential services provides a service which is essential for the maintenance of critical societal and/or economic activities (See annex II, for road transport: road authorities/operators of ITS). Each Member State shall establish a list of essential services. In general, national strategy on the security of network and information systems covers the sector of transport (article 7) Operators of essential services should be subject to the specific security requirements only with respect to those services which are deemed to be essential. Be aware of the imminent release of the revision of NIS Directive, known as NIS2: 1) Increase the level of cyber resilience (all medium size and large entities active in the sector covered by NIS2 have to comply, remove the possibility for member states to tailor the requirements) 2)Reduce inconsistencies in resilience across the internal market in the sectors already covered by the directive, by further aligning i) the de facto scope; ii) the security and incident reporting requirements; iii) the provisions governing national supervision and enforcement; and iv) the capabilities of the Member States' relevant competent authorities 3) improve the level of joint situational awareness and the collective capability to prepare and respond, by i) taking measures to increase the level of trust between competent authorities; ii) by sharing more information; and iii) setting rules and procedures in the event of a large-scale incident or crisis.

42 **(7 x 6)**	Data Governance Act	This act seeks to increase trust in data sharing, strengthen mechanisms to increase data availability and overcome technical obstacles to the reuse of data. The Data Governance Act will also support the set-up and development of common European data spaces in strategic domains, involving both private and public players, in sectors such as health, environment, energy, agriculture, mobility, finance, manufacturing, public administration and skills. The Data Governance entered into force on 23 June 2022 and, following a 15-month grace period, will be applicable from September 2023.	The Data Governance Act deals among other topics on the domain of mobility and the setup of data spaces. As such it is very much related to the NAPs. The exact consequences of this regulation on the NAPs still need to be evaluated, but it seems to be a given that especially on the data policy side of things there is a strong connection.
36 **(6 x 6)**	Potential upcoming/new services platform ("EPICS")	Initiative to create a platform like NAPCORE but for ITS and C-ITS services. This platform would be highly relevant for NAPCORE since the services are/will be based upon NAP data. Also, this platform could play a major role in harmonizing data requirements for data collection.	NAPCORE covers the NAPs (and NBs) as data exchange facilitator in Europe. The data usage in services for road users and travellers in Europe is outside of the scope of NAPCORE. NAPCORE could benefit from a "sister" organisation of services in the ITS domain, that can take over important harmonisation and coordination tasks in this field.
30 **(10 x 3)**	Truck Parking, Delegated Reg. (EU) 885/2013	Provision of information services for safe and secure parking places for trucks and commercial vehicles using the NAP	- Categories and data types involved (Static and dynamic data) - Information on safety and equipment of the parking area - Metadata - Geographical coverage of the data (priority zones where dynamic information will be provided, availability of parking place along a corridor) - Data format (DATEX II) - Data updates (once a year for static data and no less than once every 15 minutes for dynamic data)
30 **(6 x 5)**	General Data Protection Regulation (GDPR) (Regulation 2016/679)	The protection of natural persons with regard to the processing of personal data and the free movement of such data	Each potential data provider or user make available its personal information during the registration stage. Non-personal data processing can also result in the indirect identification of natural personal and in the profiling of behaviours. This means that there is a necessity to protect both personal data and natural persons from a direct or

			indirect identification and harmonize the strategy to be followed by NAP operators thereof.
25 (5 x 5)	AFIR Regulation	Deployment of alternative fuels infrastructure	This proposal is relevant for NAPCORE. Requirements on data types regarding availability of and accessibility to relevant recharging and refuelling-related data are included in Delegated regulation 2015/962 and 2017/1926, but are sparely specified. This proposal describes better which data the operators shall display and share. This is relevant information for the groups working with data and data formats.
25 (5 x 5)	Artificial Intelligence Act	Different set of rules tailored on a risk-based approach with four levels of risks. Definition of high-risk IA systems. Governance of high-risk IA systems. Requirements for high risk IA systems. On 15 June the French Presidency of the Council circulated a consolidated compromise text of the proposed Artificial Intelligence Act. It proposed to give Member States more flexibility when setting up sandboxes and to allow for live testing in the IA regulatory sandbox. It also proposed to regulate general purpose AI systems, which are AI systems capable of doing a wide range of tasks. Additional clarifications have been with regard to the amount of penalties for various infringements of the AI Act. In addition, administrative fines imposed on Union institutions, agencies and bodies has been updated. Annex III applies to AI systems intended to be used as safety components in the management and operation of road traffic or used to control or as safety components of digital infrastructure or	Article 10 sets rules for data and data governance, especially for training, validation and testing data sets that shall be subject to appropriate data governance and management practices (inter alia: data collection; formulation of relevant assumptions, notably with respect to the information that the data are supposed to measure and represent). Note that "AI systems intended to be used as safety components in the management and operation of road traffic" are considered as high risk (Annex III). Conformity Assessment Procedure and Technical documentation to prepare for High Risk systems.

		intended to be used to control emissions and pollution.	
20 **(4 x 5)**	The New EU Urban Mobility Framework (communication from the commission to the EU parliament)	Guidance for local action, toolbox for sustainable mobility To help the EU build on its 2013 urban mobility package and meet its 2050 climate target, this initiative proposes measures to encourage EU countries to develop urban transport systems - Sustainable Urban Mobility Plan play major role; Part of the wider "Efficient and Green Mobility Package"	- Cities as main connection points of TEN-T - General Issue according to Evaluation of 2013 urban mobility package: Lack of consistent collection of urban mobility data and the need for a better EU governance framework in which Member States, regional and local authorities are more heavily involved. Support should be available to local authorities to better link cross-border transport strategies with sustainable urban mobility plans, capacity building and training, and better urban planning. - Better management of transport and mobility using multimodal hubs and digital solutions is needed to increase system-wide efficiency
20 **(4 x 5)**	Data Act	Measures for a fair and innovative data economy	There is a certain relevancy for NAPCORE: NAPs form a data space, and requirements for operators of data spaces are proposed in the act. It needs to be further assessed how the NAPs fall under this legislation and what the impact for the NAPs are in detail.
18 **(6 x 3)**	Directive on open data and the re-use of public sector information (PSI) (Directive 2019/1024)	Rules to make public and publicly funded data reusable for commercial or non-commercial purposes	A lot of data on the NAP can be categorized as public sector information. As such, this data falls directly under this regulation.
16 **(4 x 4)**	MDMS - Multimodal Digital Mobility Services regulation (planned)	Planning and buying tickets for journeys that combine different modes of transport can be cumbersome for travellers in the EU. To compare different options, many use digital services such as route planners and ticket vendors. This initiative addresses challenges for these services and implements Action 37 of the sustainable and smart mobility strategy.	MDMS is "a service providing information on traffic and travel data such as location of transport facilities, schedules, availability or fares for more than one transport mode, which may include features enabling the making of reservations, bookings or payments or the issuing of tickets." Links between the MDMS regulation and the MMTIS or RTTI (and its standards) could be further discussed and clarified.

		It aims to better integrate public transport and rail services to achieve seamless multimodal passenger transport, delivering the EU Green Deal.	
12 **(4 x 3)**	A European Green Deal	How Europe can tackle climate change and environmental challenge in the best way. Transformation of EU economy.	- NAPCORE GA, p. 13: "Through increased digitalisation and support to new sustainable mobility services the project will also contribute to the common European mobility data space and the objectives of the Green Deal." - Various action fields, "Transport" most relevant for NAPCORE and derived from that "Sustainable and Smart Mobility Strategy" - as it is a broad overarching strategy, no specific elaboration on mobility data or NAPs

12
(4 x 3)
	Sustainable and Smart Mobility Strategy	Strategy/ Action Plan derived from the European Green Deal for the "Transport" sector - green and digital transformation of EU transport system	- The Strategy identifies a total of 82 initiatives in 10 key areas for action ("flagships"), each with concrete measures.
			 - most relevant for NAPCORE: key area "Smart Mobility"
			  + Flagship 6 "Making connected and automated multimodal mobility a reality"
			  + Flagship 7 "Innovation, data and Artificial Intelligence for smarter mobility"
			  + Action: Develop a common European mobility data space and establish a stronger coordination mechanism for the national access points established under the ITS Directive

12 (4 x 3)	European Electronic Tolling Service Directive (EETS) (Directive 2019/520)	The interoperability of electronic road toll systems and facilitating cross-border exchange of information on the failure to pay road fees in the Union	The European Electronic Toll Systems (/-services) Directive 2019/520/EU, sets the requirements for European interoperability of toll systems in the Union. It also has an implementing regulation (EU) 2020/20 and a delegated decision (EU) 2020/203. Relevance for NAPCORE: • The EETS Directive provides the legal basis under GDPR for the use of toll data by authorities for the purpose of traffic management (art. 14.2) • Apart from rights and obligations of stakeholders (typically Member States, Authorities, Toll Chargers, Service Providers, Users) it refers to harmonized standards, e.g. ISO/DIS 12855 and to be defined 16986 for the exchange of information between Back Offices. • CEN TC 278 WG1 is the body which takes care of related standards • For ANPR, standards will be developed by CEN TC 278 WG1 under an EC Grant Agreement (through 2024) • CEN TC 278 PT 142 provides standardization support related to EETS legislation • Toll systems/services/data currently are governed and operated by specific European and national regulations and also nationally organized in specific schemes and organizations. Therefore, it is a matter of national policies if Toll related data will be linked to NAPs.
10 (2 x 5)	Regulation on Union guidelines for the development of the trans-European transport network (EU 2021/1153 and EU 913/2010)	Mainly physical infrastructure on TEN-T network, but scope expands in revision	The revision might increase the scope of this regulation to also cover digital aspects. Also, since some of the Delegated Regulations under the ITS Directive are applicable for the TEN-T network, there is a connection between this regulation and the data the NAPs contain.

9 (3 x 3)	eCall, Delegated Reg. (EU) 305/2013	The "eCall" service automatically dials Europe's single emergency number 112 in the event of a serious road accident and communicates the vehicle's location and other relevant data to the emergency services. Thus, the response time of the emergency services is cut drastically, reducing road fatalities by about 5-10 % and resulting in less severe injuries	Only of little relevance, as this is the only delegated regulation derived from the ITS Directive without a reference to the NAP.
9 (9 x 1)	A European Strategy for Data	Creating a single market for data, ensure that more data becomes available. The data strategy should ensure that: - data can flow within the EU and across sectors; - European rules and values, in particular personal data protection, consumer protection legislation and competition law, are fully respected; - the rules for access to and use of data are fair, practical and clear, and there are clear and trustworthy data governance mechanisms in place; there is an open, but assertive approach to international data flows, based on European values. ; - creating new products and services based on more accessible data ; - reduce fragmentation between Member State - Data generated by the public sector as well as the value created should be available for the common good - Opening up government-held information (Government to Business/Open Data Directive) - Sharing and use of privately-held data by other companies (business-to-business) - Use of privately-held data by government authorities (business-to-government) - Sharing of data between public authorities - reduce market imbalances due to big player platforms	Strong relevancy for NAPCORE, e.g. because of the described concept of European mobility data spaces. However, since this is "only" a strategy document, no direct consequences from this alone are given. Rather, secondary legislation, of which the European Strategy for Data is the "umbrella" strategy, like the Data Act or the Data Governance Act have a more direct impact and warrant more urgent action from NAPCORE as in regards to this general strategic document.

		- Enhance data interoperability and quality / to empower AI developments - Enable data infrastructures and technologies to empower digital transformation - Empower individuals to exercise their rights (GDPR/ePrivacy) - Enable big data and analytics methods - Cybersecurity in general The strategy realises the vision for a genuine single market for data 1.) A cross-sectoral governance framework for data access and use 2.) Enablers: Investments (2021-2027) in data and strengthening Europe's capabilities and infrastructures for hosting, processing and using data, interoperability 3.) Competences: Empowering individuals, investing in skills and in SMEs 4.) Common European data spaces in strategic sectors and domains of public interest should lead to the availability of large pools of data in these sectors and domains, combined with the technical tools and infrastructures necessary to use and exchange data	
6 **(3 x 2)**	CER Directive (will replace the European Critical Infrastructure (ECI) Directive 2008/114)	Resilience of critical entities (related to NIS = cybersecurity whereas CER = more or less physical aspects)	Limited impact. Focus on physical infrastructure.

4 **(2 x 2)**	Free Flow of Data Regulation (2018/1807)	Framework for the free flow of non-personal data in the European Union	In general, this Regulation do not tackle NAPCORE directly, as of fact, that our project does not plan to implement any obstacles for free flow of non-personal data within EU. However, during further works in NAPCORE, we have to pay attention on regular bases if any of recommendations or tips, produced by NAPCORE team, would not act in contradiction to the rules of the Regulation 2018/1807. However, in case if such recommendation (possibly produced by NAPCORE if necessary) would anyhow encourage to constitute data localisation requirement (of course, to be further laid down by law), we have to be aware that such requirement need to be published via a national online single information point, operated by given MS.
2 **(2 x 1)**	CEN Standardization Policy	Potential issue with standard creation communities in the mobility field. Regarding license / terms of use.	Might affect some aspect of/for standards and standardisation aspects of DATEX II, TN-ITS, Transmodel, ...
1 **(1 x 1)**	Action plan to boost long distance and cross-border passenger rail (communication from the commission to the EU parliament and the council)	To promote efficient and green mobility, in line with the Commission's Strategy for Sustainable and Smart Mobility. The package also includes revisions of the regulations on TEN-T and Intelligent Transport Systems (ITS), as well as a new EU urban mobility framework.	Limited. Maybe touching work in SWG4.3
1 **(1 x 1)**	Digital Services Act package (Digital Services Act and Digital Market Act)	1/ create a safer digital space to protect fundamental rights of all users; 2/ establish a level playing field to foster innovation, growth and competitiveness	Very minor - just to check the regulation from time to time, if there are any changes
0 **(2 x 0)**	Staff working document on data spaces	The Commission publishes an overview of the state of play of the common European data spaces that are being developed in various fields.	Interesting summary of the current status and activities for EU data spaces
unrated	Cyber Resilience Act (upcoming)	Horizontal cybersecurity requirements for products with digital elements	Not evaluated yet.

Table 1: List of EU policies and developments including priority, description and relevance for NAPCORE

2. Actions

The following Actions for 2023 were defined as the 16 topmost prioritized topics and EU policies of the table of EU policies in chapter 1. Some actions were grouped into action groups.

Action Group	EU Policy area(s)/topic(s)	Lead / Main contributor(s)
1	ITS Directive 2010/40/EU (incl. Revision 2022)	DK
2	MMTIS, Delegated Reg. (EU) 2017/1926 (incl. revision 2022)	BE
3	RTTI, Delegated Reg. (EU) 2015/962 (incl. revision 2022 - 2022/670)	NL
4	• Mobility Data Space • Data Governance Act • Data Act • Directive on open data and the re-use of public sector information (PSI) (Directive 2019/1024)	DE-BASt, FR, PL, IT, ES, AT
5	SRTI, Delegated Reg. (EU) 886/2013	ASFINAG
6	• Cybersecurity Act • NIS Directive	DE-BASt
7	Potential upcoming/new ITS services platform ("EPICS")	DE-BASt, NL
8	Safe and Secure Truck Parking, Delegated Reg. (EU) 885/2013	CZ, RO
9	General Data Protection Regulation (GDPR) (Regulation 2016/679)	LV
10	AFIR Regulation	NO, FR, HR
11	Artificial Intelligence Act	LU
12	The New EU Urban Mobility Framework	AT

Table 2: Overview of Actions of WG1

In the following chapters, the actions are further detailed and described. Actions which have already been completed in 2022 have been greyed out in the following tables.

2.1.   Actions in relation to the ITS Directive Revision

Description of the topic, relevance and goal

The following actions are follow-ups after the publication of the statement paper and monitoring of the proceedings regarding the legislative process around the revision of the Directive. See chapter 3 for further description of the NAPCORE statement paper on the ITS Directive revision.

Action description	Goal	Output(s)	Partners leading	Est. time
Release of the Statement Paper on the NAPCORE website	To prove that NAPCORE is able to find a common ground	Statement Paper	WG1 / H.3	09/22
Submission to DG MOVE	To make NAPCOREs position known to the Commission	-	DE-BASt	09/22
Inform all relevant partners and important stakeholders	To make NAPCOREs position known to relevant partners especially Czech presidency of the European Council, the rapporteur of the European parliament	-	WG1 lead	09/22
Monitoring and collecting feedback		Feedback collection	WG1	Throughout 2022/2023
Monitoring activities surrounding the legislative process of the ITS Directive revision		-	WG1	Throughout 2022/2023
Follow-up meeting	To discuss updates and potential revisions of our statement paper once more details of the actual final text is known	Possibly list of new actions	WG1	12/22 and later as needed
Re-evaluate priorisation in WG1	For further action	Decision if new action(s) is/are required	WG1	6/23

2.2. Actions in relation to the MMTIS Delegated Regulation

Description of the topic, relevance and goal

Following Directive 2010/40/EU ("ITS Directive") the European Commission developed for priority action a Delegated Regulation with regard to the provision of EU-wide multimodal travel information services (Commission Delegated Regulation (EU) No 2017/1926).

The European Commission has announced a revision of the Delegated Regulation. This is the opportunity for NAPCORE to dress a state of the art, almost three years after the first deadline (data categories at the first service level had to be made accessible by the first of December, 2019). To contribute to the Regulation's revision, and based upon these findings, the current state of play and strategic evolutions of NAPs, a NAPCORE Statement Paper will be published and distributed. Regarding the timeline, the idea is to communicate NAPCORE's position before the publication of the final proposal of the Commission (Q2/2023).

The following actions will result in a NAPCORE-coordinated, SCOM approved Statement Paper, being the official point of view of NAPCORE towards the revision of the Delegated Regulation MMTIS.

Action description	Goal	Output(s)	Partners leading	Est. time
Get an overview of current MMTIS data on all NAPs (survey)	State of the art of actual implementation of the Delegated Regulation	Deliverables	WG2/WG3/sWG4.3	Partially done
Organise a workshop at the NAPCORE Mobility Data Days	Discuss first results related to MMTIS from different WGs and open debate on revision of the Regulation	Internal note	WG1 - BE	11/22
Propose and work on draft preliminary position on the revision of the Regulation	Have the possibility to share our views with workgroup leaders concerned within NAPCORE	Internal note	WG1 - BE	12/22
NAPCORE internal workshop on the drafted preliminary position	Receive input from members and adapt draft	Draft Paper	WG1 - BE	02/23
External stakeholder involvement (esp. Advisory Board) via written comments or workshop	Gather expectations regarding the role and position of NAPs and NAPCORE from external stakeholders	Updated draft paper	WG1 - BE H.2 - AT	02/23

Propose a draft Statement Paper to the SCOM	Be able to publish a common position	Final Draft Paper	WG1 - BE	02/23
SCOM approval of the Statement Paper	To reach consensus as much as possible for approval of the Statement Paper by all partners	Statement Paper	H1 / AT	03/23
Communicate the Statement Paper to the European Commission	Communicate NAPCORE official position	Statement Paper	WG1 - BE	03/23
Release Statement Paper on the NAPCORE website and message on social media	Communication on our own channels		H3	04/23
Inform all relevant partners	Make NAPCOREs position known to relevant partners etc.		WG1 - BE	04/23

2.3.　Actions in relation to the RTTI Delegated Regulation

Description of the topic, relevance and goal

The Real Time Traffic Information (RTTI) Delegated Regulation (DR), published December 18th 2014 (2015/962), has been revised in February of 2022 (2022/670). Even though the parent ITS Directive 2010/40 is currently under revision, the revised RTTI DR includes an extension of the network. A phased implementation is foreseen to gradually increase the geographical scope on accessible data:

- 1 January 2023 – providing a list and map visualisation of roads included in the 'primary road network'
- 1 January 2025 – providing all crucial data categories for the entire network, other data for primary road network
- 1 January 2025 – 1 January 2027 – providing all data categories for the entire network.

The revised RTTI DR also implies alignment on several aspects, preferably on EU-level:

- Agreement on data definition, data format and metadata
- Alignment on methods for location referencing
- Agreement on common definitions of data quality with a view to use common data quality indicators, including how to measure and monitor quality.
- Come to agreement with stakeholders what the minimum quality requirements should be
- Agreement on additional or alternative standards (if necessary)
- Defining common FRAND terms
- Harmonising on compliance assessment.

The revised RTTI DR not only has implications for road authorities, but for private organizations as well:

- Digital map producers should be encouraged to integrate relevant data updates into their existing map and map update services in timely manner.
- Service providers shall process and include, without additional costs to end users, in the relevant services they provide, any temporary traffic management measures developed by the competent authorities and made accessible by the NAPs in a machine-readable format.
- In order to comply with public policies such as road safety, service providers and digital map producers should collaborate with public authorities to correct inaccuracies in their data (feedback loop).

Each of the member states within NAPCORE has to provide a list and map visualization of roads included in the 'primary road network'. In order to be able to provide this list and map, it is important to have an overview of the 'as is' situation per member state as well as a roadmap on how gradually implement the revised RTTI DR. By coming to an agreement in an early phase, both on public as private side, on which particular elements it is necessary to align on EU-level - in order to best facilitate the deployment of services – we can prevent on divergent implementation of the revised RTTI DR. The next step will be to determine

which aspects can be dealt with within in the scope of NAPCORE and which aspects should be addressed elsewhere (for instance in the now open CEF call or other (new) projects.

Action description	Goal	Output(s)	Partners leading	Est. time
Organize a workshop at the NAPCORE Data Days	Open, first debate on revision of the Regulation: (1) what is the impact of the extension of the geographical scope, (2) what do the requirements for the private parties mean, (3) how can we as NAPCORE address (1) and (2)?	Internal note	WG1, H2	11/22
Get an overview of current RTTI data on all NAPs (survey and/or research on NAP's)	State of the actual implementation of the Delegated Regulation (which data for which type of roads, data format/standard/current quality criteria and scores on these quality criteria)	-	WG2 / WG3	01/23
Organize a webinar together with partners from the Advisory Board (service providers, TISA, TM2.0, POLIS, CEDR)	to (1) give an overview of the revised RTTI DR, (2) to hold on to and to proceed on the awareness raised during the NAPCORE Data Days, (3) get an overview of challenges road authorities are currently encountering in the information and route advices given by service providers. Result: use cases to work on together and a first categorization in levels of cooperation needed with service providers.	Webinar plus short questionnaire send out in advance to all the Member States	NL, Advisory Board members	01/23
Discussion in the physical TM2.0 meeting on February 22th in Brussel on what the overview of use cases and the levels of complexity mean for the levels of collaboration defined a few years ago in TM2.0.	To update the levels of collaboration for TM2.0 and align them with what is necessary to work together in the defined use cases.	Updated levels of cooperation for TM2.0	NL, Advisory member TM2.0 together with NL and other Advisory members	02/23
Physical meeting with road authorities and service providers at TomTom headquarter in Berlin	To classify the use cases on level of cooperation needed and start elaborating.	Agreement on use cases to align on	NL, Advisory member TomTom, together with	03/23

			NL and other Advisory members	
Update of the RTTI Action Plan	Bring more focus in the RTTI Action Plan and elaborate on concrete steps to work on	Updated RTTI Action Plan	NL	03/23
SCOM approval of the RTTI Action Plan	Agreement within NAPCORE on which aspects to address within NAPCORE	SCOM decision	WG1	03/23
Implementation of NAPCORE elements of RTTI Action Plan in Working Programme 2023	Addressing NAPCORE tasks concerning the RTTI DR to the relevant WG's	Draft working programme	WG1	Starting in 03/23

2.4. Actions in relation to the Mobility Data Space, Data Governance Act, Data Act and Directive on open data and the re-use of public sector information

Description of the topic, relevance and goal

The setup of a Mobility Data Space (MDS) is called for in several EU policies and strategies (Green Deal, Strategy for Data, Staff working document on data spaces, New EU Urban Mobility Framework, and more). A CSA by DG CNCT and DG MOVE regarding a preparatory action for the setup and implementation of a data space for mobility has started in October 2022 ("PrepDSpace4Mobility"). The NAPs as existing digital infrastructure for the exchange of mobility related data should play a crucial part in the definition and/or setup of the Mobility Data Space. NAPCORE should try to find a common view and place of the NAPs in relation to the upcoming Mobility Data Space. Next to the technical view of a possible integration, legal, organisational and communication aspects of the NAP/MDS relationship will be looked into.

The European data strategy of February 2020 announced the creation of data spaces in 10 strategic fields one of them being mobility field. The ultimate goal is that together, the data spaces will form a single European data space: a genuine single market for data. This development is aligned with EU Law on data sharing. Three main regulations regulate the data sharing in the EU.

First, the **Directive 2003/98/EC** on the re-use of public sector information, known as the PSI Directive now called Open Data Directive is an EU directive that stipulates minimum requirements for EU member states regarding making public sector information available for re-use. The Directive is an attempt to remove barriers that hinder the re-use of public sector information throughout the Union. The PSI Directive was amended in 2019, becoming the Open Data Directive (Directive (EU) 2019/1024 on open data and the re-use of public sector information), which entered into force on 16 July 2019. It consisted of a revision of the public sector information directive from 2003. Member states had until 16 July 2021 to transpose the new directive into national law. The Open Data Directive regulates the re-use of publicly/available information held by the public sector. However, the public sector also holds vast amounts of protected data (e.g. personal data and commercially confidential data) that cannot be re-used as open data but that could be re-used under specific EU or national legislation. A wealth of knowledge can be extracted from such data without compromising its protected nature, and the **Data Governance Act** provides for rules and safeguards to facilitate such re-use whenever it is possible under other legislation. Member States will need to be technically equipped to ensure that the privacy and confidentiality of data is fully respected in re-use situations. This can include a range of tools, from technical solutions, such as anonymisation, pseudonymisation or accessing data in secure processing environments (e.g. data rooms) supervised by the public sector, to contractual means such as confidentiality agreements concluded between the public sector body and the re-user. If a public sector body cannot grant access to certain data for re-use, it should assist the potential re-user in seeking the individual's consent to re-use their personal data) or the data holder's permission whose rights or interests may be affected by the re-use. Furthermore, confidential information (e.g. trade secrets) can be disclosed for re-use only with such consent or permission. Public sector bodies may charge fees for allowing the re-use as long as those fees do not exceed the necessary costs incurred. In addition, public sector bodies should incentivise the re-use for scientific research and other non-commercial purposes as well as by SMEs and start-ups, by reducing or even excluding

charging. A public sector body will have up to 2 months to take a decision on a re-use request. To help potential re-users find relevant information on what data is held by which public authorities, Member States will be required to set up a single information point. The Commission will create a European single access point (with a searchable register of the information compiled by national single information points) in order to further facilitate data re-use in the internal market and beyond. There is no obligation on public bodies to share data but where they do, they are required not to enter into exclusive data sharing agreements (subject to limited exemptions). They also have the right to impose conditions for re-use provided these are non-discriminatory, proportionate and objectively justified and do not restrict competition. It also aims at strengthening mechanisms to increase data availability and overcome technical obstacles to the reuse of data. This regulation includes guidance, technical and legal assistance to facilitate the re-use of certain categories of protected public sector data (confidential business information, intellectual property, personal data), mandatory certification for providers of data intermediation services and optional certification for organisations practising data altruism. Data intermediaries will function as neutral third parties that connect individuals and companies on one side with data users on the other. They cannot monetise the data and will have to comply with strict requirements to ensure this neutrality and avoid conflicts of interest. Any data and metadata acquired can be used only to improve the data intermediation service. The Regulation provides for a notification and supervisory framework for the provision of data intermediation services, it creates a framework for voluntary registration of organisations which collect and process data made available for altruistic processes and establishes a Data Innovation Board. The Data Governance Act impacts primarily public sector bodies, data intermediation service providers (DISPs) and data altruism organisations. Data Governance Act does not apply in the UK and outside the EU (EEA).

Third, the Data Act proposal is the second main legislative initiative resulting from the February 2020 European strategy for data. While the Data Governance Act creates the processes and structures to facilitate data sharing by companies, individuals and the public sector, the Data Act clarifies who can create value from data and under which conditions. The Data Act will apply to device manufacturers, providers of digital services and connected products (such as 'the Internet of Things or IoT) as well as public authorities in the EU. It mandates data sharing requirements to allow data sharing among businesses, public authorities and users. SMEs are exempted from these obligations, but overall, the requirements imply that the European Commission has opted for a one-size-fits-all solution that compels all businesses to adapt. Certain limits will be put in place to guarantee that third party access to shared data remains safe and harmless to the parties involved. This entails agreed upon measures to protect confidentiality, privacy and trade secrets as well as restrictions of the use of the data by market competitors of the data holder. Providers with a significant position in the market will be labelled as gatekeepers within the market. Such actors will be subject to more specific restrictions, as third parties are not allowed to share data with these gatekeepers, nor are gatekeepers allowed to request access to these data. The Data Act will also have implications on interoperability standards and cloud switching for mobility industry.

The following actions mainly focus on the alignment of NAPCORE in relation to the Mobility Data Space to define a NAPCORE-coordinated, SCOM approved strategy for NAPs regarding their role, part, integration in the Mobility Data Space as well as a communication guideline.

Action description	Goal	Output(s)	Partners leading	Est. time
Bilateral meeting between NAPCORE and Mobility Data Space CSA representatives	Get NAPCORE known and know about MDS CSA activities	-	WG1 / DE (BASt)	09/22
Strategic discussion with the Advisory Board during the Advisory Board Meeting before the NAPCORE Mobility Data Days	Get to know (outside) stakeholder's take on the NAP<>MDS positioning and vision	Notes	WG1 / DE (BASt)	11/22
Session on Mobility Data Space during NAPCORE Mobility Data Days including representatives from the MDS CSA	Get insight into the workings of the MDS CSA, discuss NAPCORE viewpoint among NAPCORE partners, the NAPCORE Advisory Board representatives and CSA representatives	Notes	WG1 / DE (BASt)	11/22
NAPCORE internal workshop (WG1 lead) on the role of NAPs in the Mobility Data Space	Find strategic, technical, communication options	Draft strategy document	WG1 / DE (BASt)	02/23
Expert workshop on the Data Governance Act, Data Act and the PSI Directive	Identify and discuss implications of those regulations for NAPs	Notes	WG1 / DE (BASt)	05/23
Expert workshop (WG2 lead) on technical aspects of relation/compatibility NAPs/MDS	Find technical options for NAP/MDS interoperability or co-existence	Technical options working paper	WG2	05/23
High-level session on NAPs in the MDS at the ITS Europe Congress	Get outside stakeholder input	Input for strategy proposal	WG1 / DE (BASt)	05/23
WG1 decision for strategy toward NAPs for SCOM approval	Decision memo for SCOM	NAPCORE strategy proposal	WG1 / DE (BASt)	08/23
SCOM approval of NAP(CORE) strategy towards MDS	SCOM approved NAPCORE strategy	Approved NAPCORE strategy => M1.1-2023	H.1 / AT	09/23
Presentation of NAPCORE strategy toward MDS at NAPCORE Multi-day event	Stakeholder information	-	WG1 / DE (BASt)	11/23

2.5. Actions in relation to the SRTI Delegated Regulation

Description of the topic, relevance and goal

In Directive 2010/40/EU ("ITS Directive") the European Commission developed a Delegated Regulation for Priority Action C, named "Data and procedures for the provision, where possible, of road safety related minimum universal traffic information free of charge to users" (EC Delegated Regulation No 886/2013). It defines, amongst others, a single list of categories of safety related traffic information (SRTI) to be provided at no extra cost for the end user at the point of use.

In order to clarify the agreed extent and scope of the Delegated Regulation amongst the collaborating public and private parties, with a special focus on vehicle-generated data, the SRTI Ecosystem Data for Road Safety (DFRS) was initiated by European Transport Ministers of participating Member States, the European Commission and automotive industry partners and, with support of the European Commission, a mutual understanding upon the Regulation was established. A Multi-Party Agreement holding the agreed terms, conditions and obligations, as well as the procedures for adding new parties was signed by all participating parties.

The source of the data exchanged within the Data for Road Safety ecosystem mostly comes from connected vehicles on the road in the European Union, produced by manufacturers which are parties to DFRS. The participating vehicle manufacturers deliver to the DFRS data ecosystem a very small fraction of the data collected from the vehicle, for reuse of such data to create SRTI messages. Other DFRS members then regroup (and where necessary, aggregate) the data to Safety Related Traffic Information ("L3" data) for reuse by service providers and road operators to generate and distribute SRTI messages.

NAPCORE should get an overview of current SRTI data on all NAPs and specifically make sure that parties participating in DFRS publish their generated SRTI data on their NAPs. NAPCORE should liaise with DFRS to create a harmonized SRTI profile in form of a Recommended Reference Profile.

Furthermore, NAPCORE could find a common understanding of the current state of SRTI event selections throughout Europe and should agree on a harmonised set of SRTI event selection.

The following actions in relation to the SRTI Delegated Regulation will result in a NAPCORE-coordinated, SCOM approved strategy for NAPs regarding SRTI (DATEX II) event selection and mapping to data standards.

Action description	Goal	Output(s)	Partners leading	Est. time
Bilateral meeting between NAPCORE and DFRS representatives	Get NAPCORE known and know about DFRS activities	-	WG1 / AT (ASFINAG)	10/22
Session on SRTI during NAPCORE Mobility Data Days including representatives from the DFRS and Car2Car CC	Get insight into the workings of DFRS and Car2Car CC, discuss NAPCORE viewpoint among NAPCORE partners, the NAPCORE Advisory Board representatives and DFRS representatives	-	WG1 / AT (ASFINAG)	11/22

Get an overview of current SRTI data on all NAPs (survey)	Current status of SRTI event selection on all NAPs	Overview document	WG3	02/23
Collection and discussion (internal workshop) of existing documents on SRTI event mappings (DATEX 2, TPEG, TMC and DNEM)	Find a common understanding of the SRTI event selections throughout NAPs and data providers	Draft strategy document	WG1 / AT (ASFINAG)	05/23
SCOM approval of NAP(CORE) strategy towards SRTI	SCOM approved NAPCORE strategy	Approved NAPCORE strategy => M1.1-2023	H.1 / AT	09/23
Presentation of NAPCORE strategy toward SRTI at NAPCORE Multi-day event	Stakeholder information	-	WG1 / AT (ASFINAG)	11/23

2.6. Actions in relation to Cyber Security and the NIS Directive

Description of the topic, relevance and goal

Cybersecurity is one of the top priorities for Europe. It is required in most context where information flows and processing are performed.

ITS has some specific challenges related to cybersecurity. Two scenarios describe some of the challenges:

1. Traffic safety relies on very low latency vehicle to vehicle message transfer, and this messaging typically has to happen between large number of vehicles in an area at an update rate of ten messages per second, leading to massive amount of communications. This communication must be absolutely trustable but still protect privacy of the drivers, and this leads to technically conflicting requirements. The challenge has been solved in European projects for Cooperative ITS, and a number of standards has been created. Even though the C-ITS Delegated Act was stopped, the cybersecurity part is technology independent and was continued. A Public Key Infrastructure (PKI) together with the needed policies at European level was created and is currently in full operation supporting large scale pilots and some limited commercial operations.

2. Trustable data access from road authorities will also require cybersecurity. National Access Point operation is one example of this class of service. The European dimension where vehicles will travel from one country, and then receive and trust data in another country, will obviously require full interoperability. There are many technical challenges embedded in this scenario, such as access restrictions and privileges, and knowing if the received data is indeed coming from a trusted source. This is normally solved by signing all data with an identity-based certificate, and then the receiving entity can look up the cert in a known database to see if the source should be trusted. This type of technology scales badly since there are so many actors and so many authorities for different purposes. Therefore, a new set of standards has been designed that a) is built on the architecture concepts and PKI from the C-ITS mentioned above, and b) is based on ROLES that can be trusted directly at the point of use without looking up the IDENTITY status in a remote database. This set of standards is purpose-written for the NAP type of scenario.

The overall coordination of Internet type cybersecurity at EU level is handled by ENISA, and DG CNECT is overall responsible for cybersecurity. ETSI has significant competence in writing such standards and have developed the mentioned standards in cooperation with ISO and IEEE. It is suggested that strong liaisons at both government and technical level is set up to all of these. It is essential to work with the national teams in the countries that already have advanced developments in ITS cybersecurity.

The overall goal is to have trustable and interoperable data exchange in Europe, to find what is taken care of by others and what more has to be done. And then to influence or initiate necessary activities to achieve this goal.

The Network and Information Security (NIS) Directive is the first piece of EU-wide legislation on cybersecurity. Its specific aim was to achieve a high common level of cybersecurity across the Member States. While it increased the Member States' cybersecurity capabilities, the implementation proved difficult, resulting in fragmentation at different levels across the internal market. To respond to the growing threats posed with digitalisation and the surge in cyber-

attacks, the Commission has submitted a proposal to replace the NIS Directive and thereby strengthen the security requirements, address the security of supply chains, streamline reporting obligations, and introduce more stringent supervisory measures and stricter enforcement requirements, including harmonised sanctions across the EU. The proposed expansion of the scope covered by NIS2, by effectively obliging more entities and sectors to take measures, would assist in increasing the level of cybersecurity in Europe in the longer term. Within the European Parliament, the file has been assigned to the Committee on Industry, Research and Energy. The committee adopted its report on 28 October 2021, as well as a mandate to enter into interinstitutional negotiations. For its part, the Council agreed its position on 3 December 2021. The co-legislators reached a provisional agreement on the text on 13 May 2022. The text now needs to be adopted formally by both institutions, with the Parliament due to vote on it in plenary in the coming months.

The proposed expansion of the scope covered by NIS2, which would effectively oblige more entities and sectors to take measures, would assist in increasing the level of cybersecurity in Europe in the longer term.

Quite a few cybersecurity related tasks could and should be taken up by the NAPs, ideally also in a coordinated and harmonized manner:

- a Threats, Vulnerabilities and Risks Analysis (TVRA)
- identification of cybersecurity measures including ICT supply chain, system-technical and organisational measures
- trusted environment, certification/PKI infrastructure management
- set up of cybersecurity action plans on a national but also European level
- and further more.

Resources from NAPCORE to do all this are not foreseen and planned. However, with the following actions, the most urgent topics for EU-wide coordination should be identified and taken up either within NAPCORE or outside.

Action description	Goal	Output(s)	Partners leading	Est. time
Organize a workshop on "Cybersecurity of NAPs" to discuss priorities, possible list of actions, possible NAPCORE internal task allocation, further H.2 gap definition, possible next steps in defining e.g. a NAPCORE consolidated guideline/recommendation etc. ...	We have a better NAPCORE internal view on the priorities and our capabilities in working on needed tasks within NAPCORE	List of next steps within NAPCORE, definition of cybersecurity related gaps for H.2 gap list	DE (BASt)	2/23
Making sure the topic of cybersecurity is put on the H.2 gap list.	H.2 has this topic on its radar for further decision on where and how to handle this topic	Topic part of H.2 gap list	NL	3/23

2.7. Actions in relation to a foreseen (C-)ITS Services Platform

Description of the topic, relevance and goal

EPICS, which stands for "European Platform on ITS and C-ITS Services", is a proposed project that seeks to coordinate European Member States' road operators and other road and mobility service providers with a focus on coordinated and harmonized ITS and C-ITS services. It is planned to submit a project proposal in January 2023 (CEF funding). As this could be highly relevant for both data provisioning and data usage of data of the NAPs, a close relation, coordination and cooperation seems to be called for. In any case, NAPCORE should be aware of this activities' actions, plans and activities in order to potentially get involved to a higher degree in a way that still needs to be defined.

The foreseen quarterly bilateral meetings between NAPCORE and EPICS representatives make sure that both parties/projects know about each other's activities. If it is deemed necessary or beneficial a coordinated SCOM-approved strategy regarding the cooperation will be crafted.

Action description	Goal	Output(s)	Partners leading	Est. time
Bilateral meeting between NAPCORE (WG1) and EPICS representatives	Get to know the status, goals, scope of EPICS activities and/or project proposal	-	WG1 / DE (BASt)	09/22
Bilateral meeting between NAPCORE (WG1) and EPICS representatives	Get to know the status, goals, scope of EPICS activities and/or project proposal	-	WG1 / DE (BASt)	12/22
Bilateral meeting between NAPCORE (WG1) and EPICS representatives	Get to know the status of EPICS project, define cooperation/coordination NAPCORE⇔EPICS	-	WG1 / DE (BASt)	03/23
Bilateral meeting between NAPCORE (WG1) and EPICS representatives	Get to know the status of EPICS project, update cooperation/coordination NAPCORE/EPICS	-	WG1 / DE (BASt)	06/23
If needed: WG1 decision for strategy toward the (C-)ITS Services platform / EPICS	Decision memo for SCOM	Possibly: Draft strategy document	WG1 / DE (BASt)	08/23
If needed: Advisory Board and SCOM involvement in strategic discussion on intensified relationship with the ITS Services platform	NAPCORE coordinated and SCOM approved strategy regarding relationship and coordination/cooperation with EPICS	Possibly: Approved NAPCORE strategy => M1.1-2023	H.1 / AT	09/23
Session involving ITS Service platform / EPICS representatives at NAPCORE Multi-day event	Stakeholder involvement and physical meeting of NAPCORE <=> ITS Service platform representatives for cooperation/coordination	-	WG1 / DE (BASt)	11/23

2.8.   Actions in relation to Safe and Secure Truck Parking Delegated Regulation

Description of the topic, relevance and goal

Following Directive 2010/40/EU ("ITS Directive") the European Commission developed for priority action E a Delegated Regulation with regard to the provision of information services for safe and secure parking places for trucks and commercial vehicles on EU level (SSTP).

In 2018 the European Commission adopted the Commission Decision (C(2018) 8264 final) updating the Working Programme related to the actions under Article 6(3) of the ITS Directive (2010/40/EU). With this Decision, the Commission intends to define the new activities that help fulfil the ITS Directive. The need for further developments in priority area II of the ITS Directive (Continuity of traffic and freight management services) is one of the proposed work programme activities. Several EU initiatives (such as Digital Transport & Logistics Forum) developed recommendations on enabling data-sharing in multimodal logistics and supply chains.

Furthermore, in the context of the establishment of EU standards and procedures to support the development of a network of safe and secure parking, in April 2022, the European Commission adopted Delegated Regulation (C(2022) 2055 final) supplementing Regulation (EC) No 561/2006 of the European Parliament and of the Council with regard to the establishment of standards detailing the level of service and security of safe and secure parking areas and to the procedures for their certification.

The actions described in the following paragraph in the table below in regards to this topic are provided as an ideal scenario roadmap. Due to NAPCORE staff resources and budget restraints, actions might be delayed until the capacity has been confirmed and secured.

This evolution as well as the latest recommendations lead to a mapping exercise with traffic data experts and create opportunities for NAPCORE to assess the need for complementary actions, e.g. standardised freight transport & logistics information flows or interfaces between traffic information/control centres and relevant stakeholders and last, but not least procedures for certification of the level of service of truck parking and rest areas. To contribute to the proposals for SSTP possible future revision, and based upon these findings, the current state of play and strategic evolutions of NAPs covering the freight traffic management services in the context of legitimate public interest relating to transport of goods. This may include information concerning: 1) Access restrictions for road goods vehicles to (major) cities and 2) Monitoring the transport of goods negatively affecting the traffic flow or road safety and therefore requiring the professional supervision or monitoring of compliance with the obligations imposed by law (among such transports include e.g. transport of oversize load or overweight load). Conditions regarding the protection of freight carriers' commercial interests or the protection of information related to the national security and public order must be taken into account. In order to intend the relevant implementing provision to make the NAPCORE SSTP complementary actions proposals more realistic, a two-step approach will be followed, starting with an initial paper (not for publication) concerning the use of electronic freight transport related data in traffic management, especially when dealing with emergency situations. This paper will be discussed with experts with regard to the traffic management and freight transport data as well as with the Commission's experts. The outcome of this discussion will be specific recommendations

which NAPCORE will propose for improvement of data access in NAPs related to freight traffic management services. The draft of NAPCORE Statement Paper will be published and distributed within the NAPCORE Advisory Board. The official Statement Paper will be drafted, when the discussion finalised.

Action description	Goal	Output(s)	Partners leading	Est. time
Get an overview of current SSTP data on all NAPs (survey)	State of the art of actual implementation of the Delegated Regulation(s)	Notes	WG3	02/23
Propose a draft preliminary statement paper on the specific NAPCORE recommendations for improvement of data access in NAPs related to freight traffic management services	Have the possibility to share our views with experts with regard to the traffic management and freight transport data as well as with the Commission's experts at an early stage	Internal note	WG1	02/23
NAPCORE Advisory Board workshop on the preliminary statement paper	Receive input from NAPCORE Advisory Board members and adapt draft	Non-paper	WG1	03/23
SCOM approval of the first preliminary statement paper (non-paper) and discussion with Commission	Give valuable input to the Commission in its process of drafting a SSTP possible future Regulation revision	Statement to the Commission only	WG1	03/23
Propose a draft Statement Paper	Be able to publish a common position	Draft Paper	WG1	04/23
NAPCORE internal workshop on the Statement Paper	Receive input from members and adapt draft	Statement Paper	WG1	05/23
SCOM approval of the Statement Paper	To reach consensus as much as possible for approval of the Statement Paper by all partners	Statement Paper	WG1	07/23
Release Statement Paper on the NAPCORE website and message on social media	Communication on our own channels		H3	07/23
Inform all relevant partners	Make NAPCOREs position known to the Commission, to relevant partners etc.		WG1	09/23

2.9. Actions in relation to the General Data Privacy Regulation

Description of the topic, relevance and goal

The General Data Protection Regulation (GDPR) was initiated by the EU Commission and entered into force on May 25, 2018. This Regulation lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data. The GDPR levy harsh fines against those who violate its privacy and security standards, with penalties reaching into the tens of millions of euros. Though Regulation was passed by the European Union (EU), it reinforces the rights of the natural persons, whose personal data are processed. It imposes obligations onto MS, when they target or process personal data related to people in the EU (art. 3 GDPR). This Regulation has an extraterritorial effect and is also applicable to non-EU countries, if some conditions are met (see art. 3, al. 2). However, the GDPR is based on a consensus between all stakeholders. The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons with regard to the processing of personal data (art. 1).

MS of the NAPCORE project may process personal data, i.e. data, which are able to identify directly or indirectly a natural person. Therefore, each member state must have a legal basis to process personal data in the context of NAPCORE and must comply with the key principles of art. 5 GDPR. Compliance with these principles shall be documented by each MS.

A Data protection impact assessment has to be carried out, prior to the processing, if the data processing is likely to result in a high risk to the rights and freedoms of natural persons. The assessment will evaluate the impact of the envisaged processing operations on the protection of personal data. The controller shall seek the advice of the data protection officer, where designated, when carrying out a data protection impact assessment. A data protection impact assessment shall in particular be required in the case of:

- a systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling
- processing on a large scale of special categories of data referred to in Article 9(1)
- a systematic monitoring of a publicly accessible area on a large scale.

This DPIA enables to identify the risks, and the technical and organisational measures taken as safeguards. The ultimate goal is to promote a balanced approach enhancing mutual cooperation between MS to better achieve an efficient mobility at Union level while at the same time engaging MS in the promotion of the values referred to in Article 2 Treaty on European Union and the Treaty on the Functioning of the European Union (Official Journal C 326, 26/10/2012 P. 0001 – 0390). Specific attention shall be made on the principle of proportionality.

The following actions are listed as an ideal roadmap for this topic only. Due to NAPCORE staff resources and budget constraints, it is not certain, that all actions listed can take place as planned here.

Action description	Goal	Output(s)	Partners leading	Est. time
Get an overview of legal obligations for MS related to GDPR compliance in NAPCORE project (e.g. art. 30, 35 GDPR)	GDPR Compliance and opportunities (GDPR is not applicable when MS carry out activities which fall within the scope of Chapter 2 of Title V of the TEU)	Excel table	Each partner	01/23
Organize an expert meeting on the processing of personal data in the context of NAPCORE	Transparency on legal requirements	Meeting	Each partner	02/23
Propose a draft preliminary statement paper on the specific use of personal data within each NAP.	Coordinated approach	Statement	WG1	03/23
SCOM approval of the Statement Paper	Formalise the coordinated approach	Document	SCOM	04/23
Release Statement Paper on the NAPCORE website and message on social media	Build Trust with third parties	Website	Each partner	04/23
Inform all relevant partners on measures to be implemented (including safeguards)	Engage all partners of the project	Document	WG 1	06/23
GDPR compliance checklist to focus MS efforts and ensure that they understand the practical steps required to avoid penalties.	Offer practical tools to help with the compliance	Document	WG1	09/23

2.10. Actions in relation to the Alternative Fuels Infrastructure Regulation

Description of the topic, relevance and goal

This proposal concerns the creation of a new Regulation for the deployment of alternative fuels infrastructure replacing Directive 2014/94/EU. It describes the requirements for the physical recharging and refuelling infrastructure and also for payment infrastructure. This DR is not a DR under the ITS Directive. This DR is currently being examined by the European parliament (vote in TRAN scheduled for October). On October 19th 2022 there were amendments adopted by the European Parliament and of the Council[1]. For NAPCORE amendments stated in article 17, 18, amendments 236-254 are especially relevant.

Requirements on data types regarding availability of and accessibility to relevant recharging and refuelling-related data are also included in Delegated regulation 2015/962, in new Delegated regulation 2022/670 and Delegated regulation 2017/1926, but are sparely specified in these delegated regulations. This proposal describes better which data the operators shall display and share.

The following actions are listed as an ideal roadmap for this topic only. Due to NAPCORE staff resources and budget constraints, it is not certain, that all actions listed can take place as planned here.

Action description	Goal	Output(s)	Partners leading	Est. time
Monitor the legislative process of the AFIR	Consider possible changes in the requirements	Update of requirements for format and profiles	WG1	Starting 11/23
Workshop with IDACS and STF representatives to discuss format and profile for recharging and refuelling data	Consolidate available work done on this topic in other projects and group and evaluate fit-for-purpose	Documentation of previous work and need for further work	WG4	Q1/23
Compilation and comparison of AFIR, MMTIS, RTTI and RTTD data requirements concerning recharging/refuelling data	Have a clear and single definition of data required by these regulations	Note or excel table	WG4	Q2/23
Provide a common format and profile for recharging and refuelling data	Compliance with DR 2022/670 RTTD	Common format	WG4	Q2/23
Draft NAPCORE guideline on Alternative Fuel data exchange via the NAPs	Draft NAPCORE recommendation	Draft guideline	WG4	Q3/23

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[1] Link: https://www.europarl.europa.eu/doceo/document/TA-9-2022-0368_EN.html

SCOM approval for NAPCORE guideline on Alternative Fuel data exchange	Harmonized NAPCORE recommendation	NAPCORE guideline on Alternative Fuel data exchange	H1	Q3/23

2.11. Actions in relation to the Artificial Intelligence Act

Description of the topic, relevance and goal

The EU Artificial Intelligence Act (AI Act), proposed by the European Commission in April 2021, aims at developing rules for artificial intelligence, and at mitigating its risks to ensure that AI systems within the EU are safe and comply with existing laws on fundamental rights, norms and values. The AI Act applies to both public and private actors inside and outside the EU as long as the AI system is placed on the Union market or its use affects people located in the EU. It can concern both providers (e.g. a developer of an AI system) and users of high-risk AI systems (e.g. a State buying an AI-based system). The AIA defines AI systems broadly by including logic- or rule-based information processing (such as expert systems), as well as probabilistic algorithms (such as machine learning). Like the GDPR, it applies to all firms wishing to operate AI systems within the EU, irrespective of whether they're based in the EU or not. The AIA adopts a risk-based approach to regulating AI systems. In terms of their perceived risk, some AI systems are banned outright, while others aren't regulated at all. First, there are '**prohibited AI practices**', which are banned outright. This includes a very limited set of particularly harmful uses of AI that contravene EU values because they violate fundamental rights (e.g. social scoring by governments, exploitation of vulnerabilities of children, use of subliminal techniques, and – subject to narrow exceptions – live remote biometric identification systems in publicly accessible spaces used for law enforcement purposes). Second, there are '**high-risk AI systems**'. In line with a risk-based approach, those high-risk AI systems are permitted on the European market subject to compliance with certain mandatory requirements and an ex-ante conformity assessment. The classification of an AI system as high-risk is based on the intended purpose of the AI system, in line with existing product safety legislation. Therefore, the classification as high risk depends not only on the function performed by the AI system, but also on the specific purpose and modalities for which that system is used. Third, there are '**limited-risk AI systems**'. AI systems under this category are subject to transparency obligations to allow individuals interacting with the system to make informed decisions. This is the case for a chatbot, where transparency means letting the user know they're speaking to an AI-empowered machine. Further examples may include spam filters, AI-enabled video and computer games, inventory management systems or customer and market segmentation systems. Providers need to ensure that natural persons are informed that they're interacting with an AI system (unless this is obvious from the circumstances and the context of use). Fourth, there are '**low-risk AI systems'**; they're low risk because they neither use personal data nor make any predictions that influence human beings. According to the European Commission, most AI systems will fall into this category.

The current proposal has a linear view of the AI value chain, in which one entity places a given AI system on the market and is made accountable for complying with the regulation whenever the system is considered "high risk". The AI Act envisions a relatively clear distinction between two entities: the provider and the

user. This division only directly addresses the situation in which the entirety of algorithmic development and design is done by the provider, while the user feeds input data into the AI system and monitors it for serious malfunctions.

Of particular interest is the issue of so-called general-purpose AI (GPAI) models, which were not mentioned in the original Commission proposal of April 2021, but are given unique treatment in the compromise proposal published in May 2022 by the Council of the European Union under the French presidency. GPAI models are characterised by their training on especially large datasets to perform many tasks. GPAI models only fall under the AI Act when their application meets the same criteria as any other model, such as being used for a high-risk purpose. These models—especially those used for natural language processing, computer vision, speech recognition, simulation, and robotics—have become central in many commercial AI applications. However, they can generate risks for fundamental rights and safety, if they are deployed for high-risk purposes. In order to mitigate these risks, developers of GPAI models must provide a documentation related to the performance of internal checks, the trustworthiness of the system (based on the information available at the time of development) as well as information related to the possible uses the system has been trained for, the related level of accuracy to be expected, and the possible mitigating measures to be adopted to ensure the mitigation of possible risks for safety and/or fundamental rights. The text proposed by the European Parliament introduces a clear reference to reasonably foreseeable uses and misuses (Recital 32, a new Recital 32a, and Recitals 42 to 44). "Particular attention should be paid to the foreseeable uses and reasonably foreseeable misuses of AI systems with indeterminate uses".

Each MS will have to clarify if and, if yes, in which extent the EU AI Act may apply to each national NAP and in the long term to a potential EU NAP. This requires to identify if AI is used, what is the level of risks and which safeguards have been taken. A risk management system, a technical documentation, a quality management system and internal controls for a conformity assessment may be required.

The following actions are listed as an ideal roadmap for this topic only. Due to NAPCORE staff resources and budget constraints, it is not certain, that all actions listed can take place as planned here. A delegation of some tasks to H2 as identified gaps is probable, further discussions will happen in WG1 for that.

Action description	Goal	Output(s)	Partners leading	Est. time
Get an overview of AI systems used In NAPCORE project	Identify the impact of the EU AI Act in NAPCORE MS	Document	WG1	03/23
Designing a risk management system: identification, evaluation of the level of risks and mitigation measures.	Overview of the level of risk	Document	WG1	05/23
Creating the technical documentation and keeping it up-to-date. This includes information requirements include, for example, the instructions for use, identification of the provider as well as characteristics, capabilities and limitations of performance of the high-risk AI system	Enable the competent authorities to assess the compliance	Document	WG1	09/23

Designing a quality management system: It needs to be documented in the form of written policies, procedures and instructions, including, for example, the following aspects:	Compliance tool	Document	WG1	10/23
Conformity assessment procedure based on internal controls	Compliance proof	Document	WG1	12/23
WG1 decision for strategy and action plan toward AI Trustworthiness and sustainability. Example of actions: identify the MS priorities, obligations and safeguards which must be put in place	Compliance and safeguards	Document	WG1	09/23
SCOM approval of the AI Trustworthiness and sustainability strategy and action plan	Validation	Document	SCOM	09/23
Identify each MS competent authorities for future cooperation	Coordination and cooperation	Letter	MS	01/23

2.12. Actions in relation to the New Urban Mobility Framework

Description of the topic, relevance and goal

To support the transition to cleaner, greener, and smarter mobility, in line with the objectives of the European Green Deal, the Commission adopted on the 14th December 2021 the new Urban Mobility Framework. The initiative complements the proposal for revised guidelines for the Trans-European > Transport Network (TEN-T revision).

The Urban Mobility Framework provides guidance for local action in cities and a toolbox for sustainable mobility, by outlining measures to encourage EU countries to develop urban transport systems. As cities are seen as main connection points of the TEN-T, it is foreseen that all major cities ('urban nodes') on that network must develop a sustainable urban mobility plan by 2025 - with public transport and active mobility (walking, cycling) at its heart.

Its objectives include:

- contributing to EU Green House Gas reduction targets as set in the Climate Law (including -55% by 2030)
- improving transport and mobility to, in and around cities as well as improving the efficiency of goods and home deliveries.

Actions are described in relation to the Revision ITS Directive (Statement Paper) and its Delegated Regulations on MMTIS (EU) 2017/1926 (incl. revision 2022) and RTTI (EU) 2015/962 (incl. revision 2022 - new designation is 2022/492) e.g.: "The EC will: consider the mandatory provision of operators' real-time data (e.g. timetable and disruption information), including from public transport, through national (data) access points, in its review of Delegated Regulation 2017/1926 on multimodal travel information services to be adopted in 2022".

Therefore, on the one hand the relevance for NAPCORE and resulting actions will be in relation to the listed actions 2.1. (ITS Directive Revision), 2.2 (MMTIS) and 2.3. (RTTI Delegated Regulation). On the other hand, it will be important for NAPCORE to have a common understanding, on how to deal with the different priorities in terms of cities/ urban motility.

The following actions should increase the dialogue concerning the alignment of different perspectives regarding cities (public transport) vs. TEN-T (road users). In order to help create synergies in terms of urban level and data collection, a Cooperation Agreement with POLIS will be set up to allow for joint work on operational level (e.g. SWG 4.3, H.2)

Action description	Goal	Output(s)	Partners leading	Est. time
Strategic discussion within Advisory Board	Strategic advice on alignment in data provisioning on urban level.	Document (internal note)	H.1	11/22
Strategic alignment with POLIS at NAPCORE Mobility Data Days	Identification of strategic issues and expectations from POLIS on cooperation with NAPCORE.	Document (internal note)	H.1	11/22
Elaborate a first draft of the Cooperation Agreement	Structure and suggestions on focal topics to jointly work on with POLIS	Document (draft Cooperation Agreement)	H.1	12/22
Collect feedback and revision	Aligned content and operational points for joint work	Document (coordinated Cooperation Agreement)	H.1/H.2/SubWG4.3/CAT	02/23
SCOM approval on Cooperation Agreement with POLIS	Approval from SCOM on content of Cooperation Agreement with POLIS	SCOM decision	H.1/ SCOM	03/23
Signing Cooperation Agreement with POLIS	Signature on cooperation	Document (signed Cooperation Agreement)	H.1/Secretary General	Q2/23

3. Coordinated NAPCORE Statement Paper on the Revision of the ITS Directive

The Statement Paper is a paper of consensus that includes all NAPCORE partners' (and thus also Member States') agreed viewpoints from a NAP and National Body perspective on the Revision of the ITS Directive. WG1 has coordinated this in 2022.

The NAPCORE Statement Paper was

- discussed in two dedicated workshops with WG1 members and experts from member states (May and June 2022)
- discussed moreover at two WG1 meetings (May and June 2022)
- discussed at SCOM meeting (June 2022)
- modified many times (input from meetings and from mails)

The purpose of making a Statement Paper was to …

- make NAPCORE's position known to the European Commission
- create "visibility" for NAPCORE and legitimize the existence of NAPCORE
- influence that the ITS Directive in the future is in line with the interests of NAPCORE
- prove that NAPCORE can come up with a joint statement / strategy for all MS/NAPs – and show that a common ground exists internally in NAPCORE
- be visible about our goals to external stakeholders and hopefully meet their expectations

The Statement Paper went through NAPCORE's official written voting procedure (three weeks during July), where all SCOM members accepted the final version and agreed to put it on the NAPCORE official homepage.

The text of the NAPCORE Statement Paper on the Revision of the ITS Directive can be found in the Annex I.

ANNEX I
NAPCORE Statement Paper on the Revision of the ITS Directive

Status: Final

Version: 4.1

Date: 4th of July

Authors: NAPCORE WG1 (NAP & NB Strategy and Governance) and experts in the member states

Main author: Sine Dyreborg, Danish Road Directorate, Member of NAPCORE WG1

This NAPCORE Statement Paper conveys a joint view from the whole NAPCORE project in regard to the revision of the ITS Directive. The NAPCORE Statement Paper is not a political statement, but merely a project statement. The purpose of this Statement Paper is to declare NAPCORE's support to the revision of the ITS Directive. Moreover, to raise concerns and to pinpoint challenges in relation to subject matters that has a direct or indirect impact on the work done in the NAPCORE framework.

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NAPCORE Statement Paper on the Revision of the ITS Directive

NAPCORE is the coordination mechanism to improve compatibility of the National Access Points (NAPs)as the public cornerstone of European mobility data exchange. Itis a project supported by the Connecting Europe Facility (CEF) of the European Union, the European Commission and a partnership of NAP operators and National Body representatives of all European Member States (and beyond). NAPCORE's goal is to improve the interoperability of mobility services related data in Europe through mobility data standard harmonization and alignment. NAPCORE sets out to empower NAPs by defining and implementing common procedures and strategy, strengthening their position and supporting steps towards the creation of European-wide ITS solutions to better facilitate the use of EU-wide data and fostering collaboration on compliance and enforcement between the National Bodies of Member States. NAPCORE supports the intentions and aims of the suggested revision of the ITS Directive and its focus on making better use of data to create a more sustainable, efficient and resilient European-wide transport network, and to improve data sharing in the mobility, transport and logistics sectors with a multimodal perspective. In fact, NAPCORE is an enabler of the ITS Directive and plays a crucial harmonization role, meaning that lessons learned could be harvested from the project which would contribute to the improvement of any future revision of the ITS Directive or its Delegated Regulations. From a technical and practical perspective, NAPCORE embraces the direction of increasing the availability, accessibility and use of data types and ITS services for an extended geographical area, while focusing on a balanced cost-benefit ratio, in particular for rural areas and minor roads. By increasing the availability of data on NAPs and simplifying the re-use of data in accordance with GDPR, NAPs will in the future contribute to the common European Mobility Data Space and, in fact, act as the backbone of it.

NAPCORE acknowledges that mandating the availability of crucial data will improve the functioning of ITS services but emphasizes that the rights of data holders and users need to be defined and guaranteed, including the conditions for reuse of data. While the mandates for data types and services offer many benefits, NAPCORE also raises attention to the significant investment needed to make the relevant data available and accessible, and to deploy the relevant services with a sufficient

level of quality. As such, it is important to consider the costs and administrative burden that will be carried by public authorities and private operators. NAPCORE is fully aware of the importance of data quality, hence NAPCORE devotes effort in this field. NAPCORE recognizes the importance of data accessibility and encourages full transparency on data quality in order to enable NAP data users to find the data adequate for their own purposes. This focus will contribute to an overall improvement of data quality in the ITS ecosystem. Based on experience with the current version of the ITS Directive and the related Delegated Regulations, NAPCORE foresees challenges in achieving the potential benefits through the actual implementation and enforcement. Experience from National Bodies and NAP operators across Europe shows that it can be difficult to ensure compliance with the requirements, especially in relation to large multinational market players. It would not be efficient for every National Body to individually approach these players. Therefore, NAPCORE will work on the alignment of compliance assessment across Member States and coordinate action between National Bodies. Additionally, it aims to provide a public-private table to discuss how NAPCORE can help to increase the provision, exchange and usage of data, as well as the provision of services. For interoperable data provision and usage, and provision of interoperable services, a harmonized enforcement approach across Europe is important. This way NAPCORE foresees that the intend benefits can be achieved and that harmonized and interoperable ITS services can be deployed across Europe in the near future. As the coordinated European network of NAPs, NAPCORE is now working on the creation of guidelines and recommendations for NAP strategies, governance and architecture, data standards and data quality, interoperability and accessibility, all of which contribute towards more harmonized NAPs. With the revision of the ITS Directive, the tasks and roles of NAPs in general will grow, therefore it is important to align and balance expectations, goals, financing and available resources. NAPCORE endorses the revision of the ITS Directive as a further step towards the creation of European-wide ITS solutions and looks forward to contributing to the important work in the subsequent delegated acts.