

European Commission

June 25th 2021

Comments from the Danish Chamber of Commerce on the Commission's roadmap/IIA on the Data Act

The Danish Chamber of Commerce is pleased to provide feedback on the European Commission's IIA for the Data Act.

Generally, we believe that use of data will be fundamental for the digital transformation of the European Union, and that use of data has a great potential to enable us to overcome many of the greatest challenges faced by our society e.g. the climate crisis.

We welcome the effort of the European Commission to establish legal certainty and to promote more data sharing in the B2B and B2G context. It is important to ensure that any future (legislative) framework encourages competition and the development of new business models.

We encourage the aim to increase B2B and B2G data sharing but stress that sharing data must always be voluntary. Therefore, legislators should seek to develop incentives, partnerships between private and public sector actors and other measures that would encourage voluntary data sharing.

Ensuring legal certainty and transparency for businesses is key to long term success and achieving desired outcomes. As a rule, we favor an approach that, 1) takes into account newly implemented regulation and/or other initiatives, whose effect is still not fully understood (e.g. the codes of conduct developed by SWIPO) and 2) does not create regulatory overlap with other pieces of EU regulation and/or other international frameworks (e.g. OECD, WTO etc.).

The Danish Chamber of Commerce looks forward to following this proposal closely and is available for further comments at any time.

Kind regards,

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Chief Advisor