



Opinion of the European Economic and Social Committee

**Proposal for a Directive of the European Parliament and of the Council amending
Directive 2007/2/EC as regards simplification of certain requirements for the establishment of the
Infrastructure for Spatial Information in the Union**

(COM(2025) 985 *final* – 2025/0393 (COD))

(C/2026/3236)

Rapporteur: **Anna SCHOEMAKERS**

Legislative procedure	EU Law Tracker
Referral	European Parliament, 17.12.2025 Council, 20.3.2026
Legal basis	Article 192(1) and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 985 <i>final</i>
Relevant Sustainable Development Goals (SDGs)	SDG 9 – Industry, Innovation, and Infrastructure SDG 11 – Sustainable Cities and Communities SDG 12 – Responsible Consumption and Production SDG 16 – Peace, Justice, and Strong Institutions
Section responsible	Agriculture, Rural Development and the Environment
Adopted in section	26.2.2026
Adopted at plenary session	18.3.2026
Plenary session No	604
Outcome of vote (for/against/abstentions)	203/1/2

1. RECOMMENDATIONS

THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE (EESC)

1.1. supports the objectives of EU competitiveness, legal simplification and reduced administrative burden, and considers that accessible, interoperable and high-quality spatial data constitute a critical enabling factor for innovation, economic and climate resilience, evidence-based policymaking and the proper functioning of the Single Market ⁽¹⁾;

⁽¹⁾ See p. 1 of the Explanatory Memorandum.

1.2. welcomes the revision of Directive 2007/2/EC (INSPIRE) ⁽²⁾ in accordance with the Commission's evaluation and the findings of REFIT and welcomes the proposed amendments aimed at simplifying obligations, removing obsolete provisions, reducing duplication and modernising governance, while preserving the fundamental objective of a coherent and harmonised European infrastructure for spatial information, under the name of GreenData4All ⁽³⁾;

1.3. strongly supports the alignment of the revised INSPIRE framework with horizontal EU data legislation, in particular Directive (EU) 2019/1024 ⁽⁴⁾ on open data and the re-use of public sector information, and welcomes the removal of overlapping and redundant provisions to ensure legal consistency, interoperability and regulatory clarity across the Union's digital acquis. The EESC considers that this approach appropriately reflects the evolution towards a single European data ecosystem, rather than parallel or fragmented sectoral regimes ⁽⁵⁾;

1.4. reiterates that the data addressed under the GreenData4All initiative should not be understood as serving environmental policy alone. Spatial environmental data are, by nature, cross-border and cross-sectoral, and constitute a strategic public asset for a wide range of Member State and Union policies, including climate adaptation, agriculture (e.g. CAP policy), air quality, space programmes, disaster risk reduction, public health, spatial planning, and civil protection. These data can support public administrations, social partners, civil society organisations, businesses, researchers and citizens, as well as EESC opinions and activities such as its work on the European Union's One-Health approach ⁽⁶⁾. The EESC therefore welcomes the continued Union-level approach of facilitating a full standardised data lifecycle, in line with subsidiarity and proportionality ⁽⁷⁾;

1.5. takes note that the Commission has conducted a meaningful and inclusive stakeholder engagement and consultation process, which has led to positive and actionable outcomes, and acknowledges the broad support expressed by public authorities, users of scientific data, civil society organisations, private persons and other stakeholders for amending and simplifying Directive 2007/2/EC, which strengthens the legitimacy and practical relevance of the proposed amendments;

1.6. would prefer an explicit reference to social partners and civil society organisations in Article 18 of Directive 2007/2/EC. Although civil society can be understood to be implicitly included, the absence of a concrete reference may lead to divergent interpretations and discretionary application at Member State level, potentially undermining consistent and inclusive implementation. Adding to this, the EESC prefers to be a partner in an implementation process delivered through a multiannual work programme;

1.7. underlines that the simplification and modernisation of the INSPIRE framework, in alignment with the latest Union rules on open data, is expected to generate annual cost savings of approximately EUR 12 million, making this an attractive part of the Environmental Omnibus package. By streamlining requirements and ensuring consistency with the current open data framework, the revised approach aims to reduce compliance costs for public authorities, while at the same time facilitating broader and more efficient access to high-value geospatial datasets for both public and private users. This is expected to enhance data re-use, support innovation and contribute to improved policy implementation across multiple sectors. The EESC supports these cost savings in time and in budget ⁽⁸⁾;

⁽²⁾ Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 establishing an Infrastructure for Spatial Information in the European Community (INSPIRE) (OJ L 108, 25.4.2007, p. 1, ELI: <http://data.europa.eu/eli/dir/2007/2/oj>).

⁽³⁾ See p. 8/9 of the Explanatory Memorandum.

⁽⁴⁾ Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (OJ L 172, 26.6.2019, p. 56, ELI: <http://data.europa.eu/eli/dir/2019/1024/oj>).

⁽⁵⁾ See p. 4/5 of the Explanatory Memorandum.

⁽⁶⁾ OJ C, C/2026/16, 16.1.2026, ELI: <http://data.europa.eu/eli/C/2026/16/oj>.

⁽⁷⁾ See p. 3/6 of the Explanatory Memorandum.

⁽⁸⁾ See p. 9/10 of the Explanatory Memorandum.

1.8. notes that the proposal does not include changes to the Union's budgetary framework and is presented as budget-neutral. However, the EESC recommends ensuring that the Member States have access to appropriate hardware and software tools so that they can use the same technical standards and procedures and thus ensure data interoperability. Building adapted capacity should remain a constant concern. Specific funds should be provided to the Member States for this purpose, in particular for the validation of data based on published standards⁽⁹⁾;

1.9. highlights that intergenerational fairness requires forward-looking policymaking that explicitly considers the long-term consequences of today's decisions for future generations. This principle is particularly relevant in the harvesting, processing and publication of spatial data, as such data are increasingly being used to inform policy choices with lasting environmental and societal impacts. The transition from the INSPIRE Directive to a future-proof GreenData4All framework therefore presents an important opportunity to continue assessing and mitigating the potential negative consequences of our data-driven future. While intergenerational fairness may appear to be a broad concept, it is directly applicable to this legislative process;

1.10. points out that intergenerational fairness encompasses avoiding adverse environmental impacts from data storage on water, energy and land use. It also encompasses social consequences, including risks of exclusion in 'white zones' – or simply unequal access. The currently unknown and potential negative consequences of AI should also not be left aside, but need to be addressed, for example through the community of expert users. The overall approach of fairness will then ensure that spatial data infrastructure remains accessible and beneficial to all, regardless of personal characteristics, background, role, or status in society, as a core component of a fair and sustainable data governance framework that serves both current and future generations;

1.11. strongly recommends that the implementation of the revised INSPIRE framework be accompanied by reinforced efforts to ensure that European spatial data are collected, stored, processed and protected within the Union, under European legal jurisdiction, in full compliance with Union law, data protection standards and the Union's objectives on strategic autonomy and digital resilience.

2. EXPLANATORY NOTES

Arguments in support of recommendations 1.1, 1.2 and 1.3

2.1. One of the enduring successes of European Union cooperation lies in the sharing and joint use of spatial data. The establishment of common frameworks for the collection, management and exchange of geospatial information has enabled many stakeholders – especially public authorities and civil society organisations at local, regional, national and Union level – to carry out their tasks more effectively, both within Member States and across borders. Open and accessible spatial data are essential tools for monitoring, planning, evaluation and continuous improvement of spatial decision-making. They support evidence-based policies and enhance administrative efficiency, transparency and accountability. Member States, acting individually, cannot adequately ensure the development, governance, management and interoperability of open spatial data for multi-purpose use by multiple stakeholders across the entire territory of the European Union.

Arguments in support of recommendation 1.4

2.2. The value of spatial data is increasingly linked to climate action, climate change mitigation and adaptation, risk prevention, and early warning and response systems for flooding, air pollution, droughts and wildfires. Open spatial data will remain particularly important with regard to strengthening the single market and implementing the European Green Deal. The process of developing a proposal for amending Directive 2007/2/EC started some time ago and was only later

⁽⁹⁾ See p. 10 of the Explanatory Memorandum.

added to the Omnibus package. This integration has no (environmental) consequences for the European Commission's proposal amending this directive, and the proposal is in full alignment with the Digital Omnibus package. While there is no single sustainable development goal explicitly dedicated to open data sharing, it is widely recognised that open and interoperable data are indispensable enablers for achieving the sustainable development goals as a whole. Reliable spatial data underpin progress across multiple goals by informing policy design, tracking outcomes and enabling coordinated action at scale.

Arguments in support of recommendations 1.5 and 1.6

2.3. At the same time, the use of shared data must continue to be firmly guided by the public interest. Governments at Member State level are responsible for this, and civil society will continue to have a role as a co-developer and as a watchdog to ensure proper data use. The EESC supports the Union's approach to open data, which rests on the principle that data should serve the common good and support sustainability objectives, but that it is important not to be naïve, and to remain alert to the risks of harvesting data for commercialisation that could contribute to environmental degradation, over-exploitation of natural resources, illegal dumping or deforestation, or be prioritised for non-transparent (international) security reasons or regulations. Again, the EESC fully supports the proposal to amend the INSPIRE Directive in line with the GreenData4all initiative, especially with the aim of continuation.

Arguments in support of recommendations 1.7 and 1.8

2.4. While welcoming the fact that technical and financial burdens are expected to decrease, the EESC notes that the establishment of dedicated funding mechanisms falls outside the scope of amendments to Directive 2007/2/EC. Nevertheless, the EESC would be in favour of making specific funds available to Member States in order to ensure the most effective and accessible use of data in this increasingly data-driven era. This is particularly relevant given the rapidity of technological development, including the fast-evolving field of artificial intelligence, which will further increase both the demand for and the value of high-quality, interoperable data.

Arguments in support of recommendations 1.9, 1.10 and 1.11

2.5. While the proposal refers to the EU Data Act (Regulation (EU) 2023/2854)⁽¹⁰⁾ and the General Data Protection Regulation (Regulation (EU) 2016/679)⁽¹¹⁾, it does not explicitly address the strategic challenges and intergenerational fairness concerns brought to the table by young people with regard to data governance and data use. When taking the initiative forward, particular attention should be paid to data storage, including its energy and water footprint, and to issues of data sovereignty and data protection on European soil. Although these aspects may fall outside the immediate scope of Directive 2007/2/EC, the EESC considers that, together with the youth perspective, they are intrinsically linked to the overarching objective of ensuring long-term governance of European spatial data that is inclusive – including the elimination of 'white zones' within the Union – sustainable and accessible for all. Addressing these dimensions is essential to maintaining trust in the European spatial data infrastructure, particularly in the current geopolitical, technological and security context.

⁽¹⁰⁾ Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act) (OJ L, 2023/2854, 22.12.2023, ELI: <http://data.europa.eu/eli/reg/2023/2854/oj>).

⁽¹¹⁾ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1, ELI: <http://data.europa.eu/eli/reg/2016/679/oj>).

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

Add recital (14) to COM (2025) 985 final amending Directive 2007/2/EC

linked to recommendation 1.11

Text proposed by the European Commission	EESC amendment
	(14) <i>In view of the strategic importance of spatial data that falls within the scope of Directive 2007/2/EC, it should be ensured that such spatial data are collected, stored, processed and protected on European soil and under European legal jurisdiction. This will strengthen legal certainty, reinforce trust in public-sector data sharing, and align the GreenData4All framework with the Union’s objectives on digital sovereignty, cybersecurity and strategic autonomy.</i>

Reason

The rapidly changing geopolitical context calls for heightened attention to the location, governance and legal framework under which European data are managed. The EESC underlines that data protection, data-sharing practices and governance standards vary significantly across global jurisdictions, and that the Union’s legal framework provides a particularly high level of protection for personal*, public-sector and strategic data.

In this context, the EESC considers it essential for European spatial data to be governed and managed in a manner that ensures continued application of European law and standards, thereby safeguarding public interest objectives, legal certainty and strategic autonomy. *INSPIRE and GreenData4All do not include personal data.

Amendment 2

Add new recital (15) to COM(2025) 985 final amending Directive 2007/2/EC

linked to recommendation 1.6

Text proposed by the European Commission	EESC amendment
	(15) <i>Article 18 of Directive 2007/2/EC is amended as follow:</i> <i>Member States shall ensure that appropriate structures and mechanisms are designated for coordinating, across the different levels of government, the contributions of civil society organisations and all those with an interest in their infrastructures for spatial information.</i>

Reason

The intention is to add an explicit reference to civil society organisations in Article 18 because the use of shared data must continue to be firmly guided by the public interest. Governments on Member State level are responsible for this, and civil society will continue to have a role as co-developer and as a watchdog to ensure proper data use. The EESC supports the Union’s approach to open data, which rests on the principle that data should serve the common good and support

sustainability objectives, but that it is important not to be naïve and to remain alert to the risks of harvesting data for commercialisation, which could contribute to environmental degradation, over-exploitation of natural resources, illegal dumping or deforestation, or be prioritised for non-transparent (international) security reasons or regulations. Again, the EESC fully supports the proposal to amend the INSPIRE Directive in line with the GreenData4all initiative, especially with the aim of continuation.

Amendment 3

Add new recital (21) to COM(2025) 985 final amending Directive 2007/2/EC

linked to recommendation 1.9 and 1.10

Text proposed by the European Commission	EESC amendment
	<i>Intergenerational fairness requires forward-looking policymaking that explicitly considers the long-term consequences of today’s decisions for future generations. These include environmental consequences, social consequences and the (as yet unknown) consequences of AI’s role in the process of producing spatial data. This principle is particularly relevant in the harvesting, processing and publication of spatial data, as such data are increasingly being used to inform policy choices with lasting environmental and societal impacts. The transition from the INSPIRE Directive to a future-proof GreenData4All framework therefore presents an important opportunity to continue assessing and mitigating the potential negative consequences of our data-driven future.</i>

Reason

While intergenerational fairness may appear to be a broad concept, it is directly applicable to this legislative process. It encompasses avoiding adverse environmental impacts from data storage on water, energy and land use. It encompasses social consequences, including risks of exclusion in ‘white zones’ – or simply unequal access. The currently unknown and potential negative consequences of AI should also not be left aside, but need to be addressed, for example through the community of expert users. The overall approach of fairness will then ensure that spatial data infrastructure remains accessible and beneficial to all, regardless of personal characteristics, background, role, or status in society, as a core component of a fair and sustainable data governance framework that serves both current and future generations.

Amendment 4

Add Article 1(11) to COM (2025) 985 final amending Directive 2007/2/EC

linked to recommendation 1.6

Text proposed by the European Commission	EESC amendment
	(11) Article 18 is amended as follows: <i>Member States shall ensure that appropriate structures and mechanisms are designated for coordinating, across the different levels of government, the contributions of civil society organisations and all those with an interest in their infrastructures for spatial information.</i>

Reason

The intention is to add an explicit reference to civil society organisations in Article 18 because the use of shared data must continue to be firmly guided by the public interest. Governments on Member State level are responsible for this and civil society will continue to have a role as co-developer and as a watchdog to ensure proper data use. The EESC supports the Union's approach to open data, which rests on the principle that data should serve the common good and support sustainability objectives, but that it is important not to be naïve and to remain alert to the risks of harvesting data for commercialisation, which could contribute to environmental degradation, over-exploitation of natural resources, illegal dumping or deforestation, or be prioritised for non-transparent (international) security reasons or regulations. Again, the EESC fully supports the proposal to amend the INSPIRE Directive in line with the GreenData4all initiative, especially with the aim of continuation.

Brussels, 18 March 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND
