

# Letters



Access Now  
Amnesty International  
Asociatia pentru Tehnologie si Internet (ApTI)  
Bits of Freedom  
Digitalcourage  
Digitale Gesellschaft  
Državljan D  
Electronic Frontier Finland  
European Center for Not-for-Profit Law Stichting (ECLN)  
European Digital Rights (EDRI)  
Fitug e.V.  
Homo Digitalis  
IT-Pol Denmark  
La Quadrature du Net  
noyb  
Open Rights Group  
Panoptykon  
Privacy International

Brussels, 14/06/2022  
Ref: OUT2022-0046

Dear Madam/ Sir,

The EDPB very much welcomes your letter calling upon the structural and procedural enforcement of the GDPR and its work to promote and safeguard data protection.

It has always been in focus of our activities to further enhance the effectiveness of cooperation and enforcement procedures under the GDPR, as evidenced by the statistics on the Supervisory Authorities' activities in 2021: 505 cross-border cases have been created in the case register, 209 One-stop-shop (Art 60) draft decisions have been issued, which resulted in 141 Final Decisions.

To improve the cooperation between data protection supervisory authorities, the Board has already launched several initiatives, such as the Coordinated Enforcement Framework, the Support Pool of Experts, or Secondment programmes, which would facilitate the sharing of knowledge, exchange of experts, methodologies and good practices among the authorities, with the active participation of colleagues from the authorities. I would also like to recall the guidance recently published by the EDPB

regarding OSS procedures (Guidelines 02/22), which addresses several key cooperation issues in order to outline legally sound and consistent approaches to be followed by all SAs and the new Guidelines on the calculation of administrative fines under the GDPR (Guidelines 04/2022).

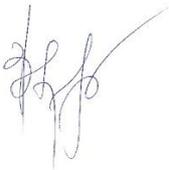
A two-day high level meeting took place in Vienna in April 2022, where the EDPB members agreed to diversify the cooperation methods used for strong and swift enforcement and consistent interpretation and application of the GDPR. In this context the EDPB members agreed:

- i. to collectively identify cross border cases of strategic importance in different Member States on a regular basis, for which cooperation will be prioritised and supported by EDPB;
- ii. that the EDPB will deal with specific legal issues on matters of general application for instance by making greater use of consistency opinion to take position;
- iii. that they commit to further exchange information on national enforcement strategies with a view to agreeing on annual enforcement priorities at EDPB level;
- iv. to facilitate the cross-border exchange of information, and therefore propose a template for data subjects' complaints, to be used by DPAs on a voluntary basis, and to improve IT cooperation tools of the EDPB;
- v. to identify a list of procedural aspects that could be further harmonised in EU law to maximise the positive impact of GDPR cooperation; and
- vi. to solidly embed the GDPR and DPAs in the overall regulatory architecture that is being developed for the digital market (Data Act, DMA, DSA, AI Act, DGA).

Regarding EDRI's call for guidance for DPAs, the EDPB acknowledges that different procedural rules, different data protection cultures and different market situations pose challenges for the consistent application of the GDPR, however one of the EDPB's main objectives is to bridge these differences and provide guidelines for consistent application.

Overall, the GDPR has created an innovative governance system designed to ensure a high level of data protection and the EDPB members are fully committed to the consistent and effective application of the GDPR.

Yours sincerely,



Ventsislav Karadjov

Vice-Chair of the EDPB