



## *Input Have your Say*

The [Groningen Declaration Network](#) (GDN) takes this opportunity to “**have our say**” about *Draft implementing regulation - Ares(2026)1286304*

### **Who we are**

The GDN Network is an international, non-profit federated trust located in the Netherlands. It represents a voluntary network of like-minded organizations and individuals that seek to make digital student data portability happen. Its network of thought leaders from around the globe are collaborators who seek to support, advise, and offer innovative changes in the ways we share artifacts of academic learning. The GDN Network seeks common ground in best serving the academic and professional mobility needs of citizens worldwide by bringing together stakeholders in the digital student data ecosystem. It seeks to develop and support best practices and support the advancement of globally accepted standards for safe and citizen-oriented convenings and information exchanges.



*The main goal of the Groningen Declaration is to develop best practices and advocate for and support globally-accepted standards for secure, citizen-centered digital capacity building and portability of student data and academic credentials.*



## Our observations

- The GDN advocates implementation of standards that ensures interoperability in the Educational and Employment sector, not only within Europe but also in the rest of the world.
- Europe has been a thought leader in this space; we extend our compliments to the Commission for the great work that has been done already, legally through implementing acts of the Directive, Technical (through the architectural reference framework ) and through extensive (on going) testing by EC-(co)funded Large Scale Pilots e.g. [DC4EU](#)
- The DC4EU project confirmed that the European Digital Identity (EUDI) Wallet ecosystem is technically viable for secure, cross-border use in foundational public domains like Education and Social Security. Across 101 institutions in 25 countries, this consortium successfully issued and verified high-assurance credentials - digital diplomas across borders.
- The consortium enabled high-assurance interoperability using emerging global standards for digital credentials.
- It is promising to see that the Commission also formally includes these formats and protocols for machine-readable, automatically portable credentials enabling (semantic) interoperability and portability (like W3C-VC which has been extensively tested by the consortium DC4EU).

## Our Advice to the Commission

- We see the reference to these protocols as promising and encourage the Commission to establish the necessary Regulatory Framework and guidance (legal for European member states, advisory for others) for the operational use of referenced standards and protocols in this Implementation Act.
- For countries outside the EU the GDN encourages the EC to build international partnerships and translation/cross walk capacity that support projects that advance global interoperability principles through co-funded world projects (i.e. beyond European countries) as a way to extend the work and test out the framework internationally beyond European member states (plus Norway, Ukraine and Switzerland.)
- A complete EU regulatory Framework for ALL standards and protocols mentioned or referenced in the Draft Implementation Acts (Including widely tested and adopted standards such as W3C-VC) enforces a global momentum for interoperable, portable digital credentials.