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LIMITE

**COSI 110
DAPIX 198
ENFOCUSTOM 134
ENFOPOL 250
AVIATION 71
GENVAL 60
JAI 514**

NOTE

From: Spanish delegation
To: Working Party on Information Exchange and Data Protection (DAPIX)
Subject: Directive (EU) 2016/681 on the use of passenger name record (PNR) data
- Technical aspects and application in the intelligence field / discussion
note

Spain is highly interested to implement (EU) Directive 2016/681 on the use of passenger name record data, the so-called PNR Directive, and likes to remind Member States of the challenges for the establishment of national PIUs. Therefore, Spain invites Member States to agree on:

- coherent standards regarding the technical requirements for the submission of PNR data;
- the channel, SIENA or sTESTA, for PIU/PIU-, and PIU/EUROPOL information exchange;
- templates for PIU/PIU- and PIU/EUROPOL-information exchange with sufficient margins to include the requested information and the necessary security standards;

- coherent IT applications for each PNR system in order to ensure a quick and efficient information exchange, using the templates referred to as interface with the system;
- defined guidelines for information exchange between third States and European PIUs.

Regardless of the challenges in sight today, we believe that there must be a forum attached to the Council which is responsible for discussing technical and legal issues at stake. For this reason, the solution that a group within DAPIX to monitor developments in this area, as well as to monitor what has been approved in other working groups, is paramount.
