

Brussels, 12 May 2026
(OR. en, ga)

9219/26

**Interinstitutional File:
2025/0360 (COD)**

**SIMPL 97
ANTICI 100
DATAPROTECT 155
CYBER 222
TELECOM 228
CODEC 900
PROCIV 97
COMPET 569
MI 471
INST 220
PARLNAT 116
PARLNAT**

COVER NOTE

From: The Irish Houses of the Oireachtas
date of receipt: 7 May 2026
To: The President of the Council of the European Union

Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2016/679, (EU) 2018/1724, (EU) 2018/1725, (EU) 2023/2854 and Directives 2002/58/EC, (EU) 2022/2555 and (EU) 2022/2557 as regards the simplification of the digital legislative framework, and repealing Regulations (EU) 2018/1807, (EU) 2019/1150, (EU) 2022/868, and Directive (EU) 2019/1024 (Digital Omnibus)
[15698/25 - COM(2025)837 final]
- Opinion on the application of the Principles of Subsidiarity and Proportionality

Delegations will find enclosed the opinion¹ of the Irish Houses of the Oireachtas on the above.

¹ The translation(s) of the opinion may be available on the Interparliamentary EU Information Exchange website (IPEX) at the following address: <https://secure.ipex.eu/IPEXL-WEB/document/COM-2025-0837>



**Tithe an
Oireachtais**
**Houses of the
Oireachtas**

**An Comhchoiste um Dhlí agus Ceart, Gnóthaí Baile agus
Imirce**

An Cion Polaitiúil maidir le

COM(2025)837 Togra le haghaidh RIALACHÁN Ó PHARLAIMINT NA hEORPA AGUS ÓN gCOMHAIRLE lena leasaítear Rialacháin (AE) 2016/679, (AE) 2018/1724, (AE) 2018/1725, (AE) 2023/2854 agus Treoracha 2002/58/CE, (AE) 2022/2555 agus (AE) 2022/2557 a mhéid a bhaineann leis an gcreat reachtach digiteach a shimpliú, agus lena n aisghairtear Rialacháin (AE) 2018/1807, (AE) 2019/1150, (AE) 2022/868, agus Treoir (AE) 2019/1024 (Omnibus Digiteach)

Bealtaine 2026

Joint Committee on Justice, Home Affairs and Migration

Political Contribution on

COM(2025)837 Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2016/679, (EU) 2018/1724, (EU) 2018/1725, (EU) 2023/2854 and Directives 2002/58/EC, (EU) 2022/2555 and (EU) 2022/2557 as regards the simplification of the digital legislative framework, and repealing Regulations (EU) 2018/1807, (EU) 2019/1150, (EU) 2022/868, and Directive (EU) 2019/1024 (Digital Omnibus)

May 2026

34/JCH/12

Page 1 of 22

Table of Contents

| | |
|--|-----------|
| 1. Introduction | 3 |
| 2. Scrutiny by the Committee | 3 |
| 3. Decision of the Committee | 3 |
| 3. Opinion of the Joint Committee | 5 |
| 4. Recommendations of the Joint Committee | 8 |
| APPENDIX 1 - Membership..... | 10 |
| APPENDIX 2 – Committee Information..... | 11 |

1. Introduction

1. The Oireachtas Joint Committee on Justice, Home Affairs and Migration (“the Committee”) considers the “*Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2016/679, (EU) 2018/1724, (EU) 2018/1725, (EU) 2023/2854 and Directives 2002/58/EC, (EU) 2022/2555 and (EU) 2022/2557 as regards the simplification of the digital legislative framework, and repealing Regulations (EU) 2018/1807, (EU) 2019/1150, (EU) 2022/868, and Directive (EU) 2019/1024 (Digital Omnibus)* (the “Proposal”) to be significantly important to Ireland and the EU.

2. Scrutiny by the Committee

2. The Committee held one public engagement to discuss the proposal. The public engagement took place on 24 March 2026 with representatives of:

- European Digital Rights (EDRI)
- DIGITAL EUROPE
- DCU Institute for Media, Democracy and Society
- Irish Council for Civil Liberties

Having considered its discussions with the above stakeholders it was agreed by the Committee at its meeting on 24 March 2026 to write a Political Contribution on this proposal.

3. Decision of the Committee

3. On 24 March 2026, the Committee agreed to draft a political contribution and to forward a copy to Jim O’ Callaghan T.D. Minister for Justice, Home Affairs and Migration, Ursula von der Leyen, President of the European Commission,

Roberta Metsola MEP, President of the European Parliament, and Ms.
Thérèse Blanchet, Secretary General of the Council of the European Union.

4. The Committee further agreed that, in the interests of inter-parliamentary cooperation on EU matters, a copy of this report be forwarded to the appropriate Committee in the National Parliament of each EU Member State and to Ireland's MEPs.

3. Opinion of the Joint Committee

a) Having considered the proposal in detail, the Committee makes the following observations: -

- a. The Committee notes that the proposal forms part of the EU's digital simplification agenda. The Committee notes that the proposal claims to provide for a set of technical amendments aimed at simplifying the digital legislative framework and stimulating EU competitiveness. The Committee notes that the proposal aims to reduce the burden for businesses, public administrations, and citizens, by reducing administrative compliance costs and providing greater legal certainty across a large corpus of digital legislation. The Committee notes that the technical amendments proposed seek to preserve the same standard of protections of fundamental rights and are not intended to amend the underlying objectives of the digital regulatory framework.
- b. The Committee, in general, welcome a simplification of EU digital legislation where that simplification enhances clarity and solidifies the effectiveness and adequate enforcement of the rules. The Committee consider that a simplification agenda should not weaken existing protections and safeguards for individuals. The Committee is concerned that the proposal in this case goes further than simplification and that a number of the proposed amendments risk introducing substantial changes to the rules governing data protection and risk weakening existing rules, safeguards and protections for individuals. The Committee is concerned that this proposal risks undermining predictability and the high standards of protection that currently exist.
- c. The Committee notes that the proposal seeks to make several legislative amendments to the GDPR aimed at enhancing legal certainty and facilitating compliance. The Committee recognises the benefit of measures that address difficulties for small and medium-sized enterprises, however the Committee is concerned that the

proposed amendments could introduce greater uncertainty, complexity and a risk of inconsistent enforcement, contrary to the intention of the proposal. Overall, the Committee considers the GDPR to be largely fit for purpose and is concerned that the proposed amendments risk having a destabilising effect.

- d. The Committee is concerned that the proposed clarification to the definition of 'personal data' risks lowering the level of protections and diminishing the rights of individuals in this regard. The Committee notes that the current objective assessment of identifiability, as it exists, ensures a single, EU wide standard. The Committee is concerned that the proposed clarification introduces a controller-specific interpretation that would allow personal data to be treated as personal data in some instances and as non-personal data in other instances. The Committee is concerned that this would risk undermining legal certainty and fragmenting the application of EU data protection law.
- e. The Committee is concerned by the proposed amendments which provide a definition of scientific research under the GDPR. The Committee is concerned that the proposal risks blurring the boundaries between public interest scientific research and commercial product development. The Committee is concerned that the amendment risks broadening narrow research derogations in a way that could reduce transparency and reuse constraints. The Committee is concerned that the proposal in this regard risks weakening the principal of purpose limitation.
- f. The Committee notes that the proposal seeks to clarify the situation concerning abuse by data subjects of the right of access to their personal data. The Committee notes that a data subject who requests to access their personal data may be refused or charged a reasonable fee where the right of access is used in an abusive manner for purposes other than in the protection of their data. The Committee is

concerned that the proposal risks broadening the discretion afforded to controllers in this area and undermining existing data subject access rights. The Committee is concerned that the proposal risks turning the right of access into a conditional mechanism dependent on controller assessments thus undermining predictability and legal certainty.

- g. The Committee notes that the proposal clarifies when a controller may rely on Article 6(1)(f) GDPR to pursue a legitimate interest and process personal data in the context of development and use of AI systems and models. The Committee is concerned that by introducing a specific provision for AI related processing, the proposal risks elevating certain forms of large- scale data reuse from a contextual assessment to a structurally recognised category of lawful processing. The Committee is concerned that the proposal risks creating a presumption that AI training and operation are by default compatible with the legitimate interest of the controller and risks normalising the broad use of personal data without sufficiently robust necessity and proportionality checks. The Committee is also concerned in relation to the right to object to legitimate interest processing carried out for AI purposes. The Committee is concerned that in a context where many individuals are unaware that their data is incorporated into AI training pipelines that the individual's right to object is eroded.
- h. The Committee is concerned that the proposal risks weakening protections for special category data where it is used in the training of AI systems. The Committee notes that controllers remain required to implement technical and organisational measures to avoid processing special category data and further note that controllers are required to remove such data once it is identified within AI systems unless that removal requires disproportionate effort. The Committee is concerned that the proposal risks reversing the approach which prohibits, as a rule, the processing of special category data towards an acceptance of the presence of special category data within AI systems. The

Committee has concern that this further risks being problematic in circumstances where proposed amendments to the AI Act permit the processing of special category data for the purpose of bias detection and correction in AI systems. The Committee is concerned that the proposal risks normalising the retention of sensitive personal data in favour of AI system optimisation. The Committee is further concerned by the risk of legal uncertainty which could arise due to the reliance on disproportionate effort as a standard when individuals may not be able to reasonably predict when their special category data will be removed or retained especially considering the proposed bias-related provisions of the AI Act.

- i. The Committee notes that as the proposal claims to be technical in nature that it is therefore not underpinned by a full impact assessment in accordance with the Better Regulation guidelines. Insofar, as the Committee consider that certain measures contained within the proposal risk going beyond mere technical amendments the Committee is concerned that proceeding without a full impact assessment report elevates the risk of unjustified changes within the proposal.

4. Recommendations of the Joint Committee

5. The Committee recommends that: -
 - a. Further consideration be given towards utilising a full legislative proposal supported by a full impact assessment report with adequate consultation periods and evidentiary requirements to introduce the elements of the proposal that risk going beyond mere technical amendments and instead risk substantial changes to the rules governing data protection.
 - b. Further consideration be given towards parsing recent decisions of the Court of Justice of the European Union to alleviate the risk of

misinterpretation or codification of a case-specific assessments into a general regulatory mechanism.

- c. Pursue with greater vigour non-legislative measures, including the issuance of practical guidance, stakeholder engagement and additional support such as templates and checklists which can provide greater clarity on GDPR and reduce the need to pursue legislative measures that risk substantial change.

Matt Carthy

Matt Carthy, T.D.
Cathaoirleach
07 May 2026

APPENDIX 1 – Committee Membership

Cathaoirleach

[Matt Carthy TD](#), Sinn Féin

Leaschathaoirleach

[Paula Butterly TD](#), Fine Gael

Members

[Tom Brabazon TD](#), Fianna Fáil

[Catherine Callaghan TD](#), Fine Gael

[Albert Dolan TD](#), Fianna Fáil

[Gary Gannon TD](#), Social Democrats

[Alan Kelly TD](#), Labour

[Pádraig O'Sullivan TD](#), Fianna Fáil

[Mark Ward TD](#), Sinn Féin

[Senator Robbie Gallagher](#), Fianna Fáil

[Senator Garret Kelleher](#), Fine Gael

[Senator Michael McDowell](#), Independent

[Senator Anne Rabbitte](#), Fianna Fáil

[Senator Lynn Ruane](#), Independent

APPENDIX 2 – Committee Information

Committee videos

Footage of Committee proceedings can be found on the [Committee videos page](#).

Committee debates

Transcripts of Committee debates can be found on the [Committee debates page](#).

Contact details

The contact details for the Committee can be found on the [Committee page](#).

Orders of reference

Read the [Orders of reference](#) for the Committee.



**Tithe an
Oireachtais**
**Houses of the
Oireachtas**

An Comhchoiste um Dhlí agus Ceart, Gnóthaí Baile agus Imirce

An Cion Polaitiúil maidir le

COM(2025)837 Togra le haghaidh RIALACHÁN Ó PHARLAIMINT NA hEORPA AGUS ÓN gCOMHAIRLE lena leasaítear Rialacháin (AE) 2016/679, (AE) 2018/1724, (AE) 2018/1725, (AE) 2023/2854 agus Treoracha 2002/58/CE, (AE) 2022/2555 agus (AE) 2022/2557 a mhéid a bhaineann leis an gcreat reachtach digiteach a shimpliú, agus lena n-aisghairtear Rialacháin (AE) 2018/1807, (AE) 2019/1150, (AE) 2022/868, agus Treoir (AE) 2019/1024 (Omnibus Digiteach)

Bealtaine 2026

An Comhchoiste um Dhlí agus Ceart, Gnóthaí Baile agus Imirce

An Cion Polaitiúil maidir le

COM(2025) 837 Togra le haghaidh RIALACHÁN Ó PHARLAIMINT NA hEORPA AGUS ÓN gCOMHAIRLE lena leasaítear Rialacháin (AE) 2016/679, (AE) 2018/1724, (AE) 2018/1725, (AE) 2023/2854 agus Treoracha 2002/58/CE, (AE) 2022/2555 agus (AE) 2022/2557 a mhéid a bhaineann leis an gcreat reachtach digiteach a shimpliú, agus lena n-aisghairtear Rialacháin (AE) 2018/1807, (AE) 2019/1150, (AE) 2022/868, agus Treoir (AE) 2019/1024 (Omnibus Digiteach)

Bealtaine 2026

34/JCH/12

An Clár Ábhar

| | |
|--|-----------|
| <u>1. Réamhrá</u> | 14 |
| <u>2. Grinnscrúdú arna dhéanamh ag an gCoiste</u> | 14 |
| <u>3. Cinneadh an Choiste</u> | 14 |
| <u>3. Tuairim an Chomhchoiste</u> | 16 |
| <u>4. Moltaí an Chomhchoiste</u> | 20 |
| <u>AGUISÍN 1 – Comhaltas an Choiste</u> | 20 |
| <u>AGUISÍN 2 – Faisnéis an Choiste</u> | 22 |

1. Réamhrá

Measann Comhchoiste an Oireachtais um Dhlí agus Ceart, Gnóthaí Baile agus Imirce (“an Coiste”) go bhfuil an-tábhacht leis an *“Togra le haghaidh RIALACHÁN Ó PHARLAIMINT NA hEORPA AGUS ÓN gCOMHAIRLE lena leasaítear Rialacháin (AE) 2016/679, (AE) 2018/1724, (AE) 2018/1725, (AE) 2023/2854 agus Treoracha 2002/58/CE, (AE) 2022/2555 agus (AE) 2022/2557 a mhéid a bhaineann leis an gcreat reachtach digiteach a shimpliú, agus lena n-aisghairtear Rialacháin (AE) 2018/1807, (AE) 2019/1150, (AE) 2022/868, agus Treoir (AE) 2019/1024 (Omnibus Digiteach)”* (an “Togra”) d’Éirinn agus do AE.

2. Grinnscrúdú arna dhéanamh ag an gCoiste

Reáchtáil an Coiste rannpháirtíocht phoiblí amháin chun an togra a phlé. Bhí an rannpháirtíocht phoiblí ar siúl an 24 Márta 2026 le hionadaithe uathu seo a leanas:

- European Digital Rights (EDRI)
- DIGITAL EUROPE
- Institiúidí DCU um Meáin Todhchaí, Daonlathas agus Sochaí
- Comhairle na hÉireann um Shaoirsí Sibhialta

Tar éis a phléití leis na páirtithe leasmhara thuas a bhreithniú, chomhaontaigh an Coiste ag a chruinniú an 24 Márta 2026 Cion Polaitiúil a scríobh maidir leis an togra sin.

3. Cinneadh an Choiste

An 24 Márta 2026, chomhaontaigh an Coiste cion polaitiúil a dhréachtú agus cóip de a chur ar aghaidh chuig Jim O’Callaghan T.D. an tAire Dlí agus Cirt, Gnóthaí Baile agus Imirce, Ursula von der Leyen, Uachtarán an Choimisiúin Eorpaigh, Roberta Metsola FPE, Uachtarán Parlaimint na hEorpa, agus Thérèse Blanchet, Uasal, Ardrúnaí Chomhairle an Aontais Eorpaigh.

Chomhaontaigh an Coiste thairis sin, ar mhaithe le comhar idirpharlaiminteach maidir le hábhair AE, go gcuirfear cóip den tuarascáil seo ar aghaidh chuig an gCoiste iomchuí i bParlaimint Náisiúnta gach Ballstáit de chuid AE agus chuig Feisirí Eorpacha na hÉireann.

3. Tuairim an Chomhchoiste

- a) Tar éis an togra a bhreithniú go mion, tugann an Coiste na barúlacha seo a leanas: -
- a. Tugann an Coiste dá aire go bhfuil an togra mar chuid de chlár oibre simplithe dhigitigh AE. Tugann an Coiste dá aire go maítear leis an togra go ndéantar foráil ann maidir le sraith leasuithe teicniúla dírithe ar an gcreat reachtach digiteach a shimpliú agus ar iomaíocht AE a spreagadh. Tugann an Coiste dá aire go bhfuil sé d'aidhm ag an togra laghdú a dhéanamh ar an ualach do ghnólachtaí, riaracháin phoiblí agus saoránaigh, ach costais chomhlíontachta riaracháin a laghdú agus deimhneacht dhlíthiúil níos mó a sholáthar ar fud corpas de reachtaíocht dhigiteach. Tugann an Coiste dá aire gurb amhlaidh leis na leasuithe teicniúla a fhéachtar leis an gcaighdeán céanna de chosaintí ceart bunúsach a chaomhnú agus nach bhfuil siad beartaithe chun cuspóirí bunúsacha an chreata rialála dhigitigh a leasú.
 - b. Tríd is tríd, fáiltíonn an Coiste roimh reachtaíocht dhigiteach AE a shimpliú i gcás ina bhfeabhsaítear soiléire leis an simpliú sin agus ina ndaingnítear éifeachtacht agus forfheidhmiú leordhóthanach na rialacha leis sin. Measann an Coiste nár cheart na cosaintí ná na coimircí atá ann cheana féin do dhaoine aonair a lagú le clár oibre simplithe. Tá an Coiste buartha go bhfuil níos mó ná simpliú i gceist leis an togra sa chás seo agus go bhfuil baol ann gurb amhlaidh le roinnt de na leasuithe beartaithe a thabharfar isteach athruithe substaintiúla ar na rialacha lena rialaítear cosaint sonraí agus go bhfuil baol ann go lagófar na rialacha, na coimircí agus na cosaintí atá ann cheana do dhaoine aonair dá ndeasca. Tá an Coiste buartha go bhfuil baol ann go mbainfeadh an bonn ó intuarthacht agus ó na caighdeáin arda chosanta atá ann cheana féin de dheasca an togra sin.
 - c. Tugann an Coiste dá aire go bhféachtar le leasuithe reachtacha éagsúla a dhéanamh ar RGCS leis an togra, leasuithe atá dírithe ar

fheabhas a chur ar dheimhneacht dhlíthiúil agus comhlíonadh a éascú. Aithníonn an Coiste an tairbhe a bhaineann le bearta lena dtugtar aghaidh ar dheacrachtaí le haghaidh fiontair bheaga agus mheánmhéide, mar sin féin, tá an Coiste buartha go bhféadfaí éiginnteacht níos mó, castacht agus riosca forfheidhmithe neamhréirigh, atá contrártha do rún an togra, a thabhairt isteach leis na leasuithe beartaithe. Ar an iomlán, measann an Coiste go bhfuil RGCS oiriúnach don fheidhm, den chuid is mó, agus tá sé buartha go bhfuil baol ann go mbeidh éifeacht dhíchobhsaitheach ag na leasuithe beartaithe.

- d. Tá an Coiste buartha go bhfuil baol ann go n-ísleofar an leibhéal cosaintí agus go laghdófar cearta daoine aonair maidir leis sin de dheasca an tsoiléirithe bheartaithe ar an sainmhíniú ar 'sonraí pearsanta'. Tugann an Coiste dá aire go gcinntítear leis an measúnú oibiachtúil reatha ar in-sainaitheantacht, mar is ann dó, caighdeán aonair ar fud an Aontais. Tá an Coiste buartha gurb amhlaidh leis an soiléiriú beartaithe a thugtar isteach léiriú a bhaineann go sonrach le rialaitheoir lena bhféadfaí déileáil le sonraí pearsanta mar shonraí pearsanta i gcásanna áirithe agus mar shonraí neamhphearsanta i gcásanna eile. Tá an Coiste buartha go mbeadh baol ann go mbainfí an bonn tríd sin ó dheimhneacht dhlíthiúil agus go ndéanfaí cur i bhfeidhm dhlí AE maidir le cosaint sonraí a ilroinnt.
- e. Tá an Coiste buartha faoi na leasuithe beartaithe lena soláthraítear sainmhíniú ar thaighde eolaíoch faoi RGCS. Tá an Coiste buartha go bhfuil baol ann go bhfágfaidh an togra go mbeidh na teorainneacha idir taighde eolaíoch leasa phoiblí agus forbairt táirgí tráchtála doiléir. Tá an Coiste buartha go bhfuil baol ann go leathnófar maoluithe taighde cúnga de dheasca an leasaithe, agus sin ar bhealach lena bhféadfaí trédhearcacht a laghdú agus srianta a athúsáid. Tá an Coiste buartha go bhfuil baol ann maidir leis sin go lagófar prionsabal an teorannaithe de réir cuspóra de dheasca an togra.

- f. Tugann an Coiste dá aire go bhféachtar leis an togra le soiléiriú a thabhairt ar an staid maidir le mí-úsáid a bheith á baint ag daoine is ábhar do shonraí as an gceart rochtana ar a sonraí pearsanta. Tugann an Coiste dá aire, i gcás duine is ábhar do shonraí, a iarrann rochtain a fháil ar a shonraí nó ar a sonraí pearsanta, go bhféadfar diúltú dó nó di nó táille réasúnach a ghearradh air nó uirthi i gcás ina n-úsáidtear an ceart rochtana ar bhealach mí-úsáideach chun críoch eile seachas chun a shonraí nó a sonraí a chosaint. Tá an Coiste buartha go bhfuil baol an go leathnófar an lánrogha a thugtar do rialaitheoirí sa réimse sin de dheasca an togra, agus go bhfuil baol ann, dá dheasca sin, go mbainfear an bonn ó na cearta rochtana atá ag daoine is ábhar do shonraí cheana féin. Tá an Coiste buartha go bhfuil baol ann go n-athrófar leis an togra an ceart rochtana ina shásra coinníollach de réir measúnuithe rialaitheora, agus dá réir sin, go mbainfear an bonn ó intuarthacht agus deimhneacht dhlíthiúil.
- g. Tugann an Coiste dá aire go soiléirítear leis an togra an tráth a fhéadfaidh rialaitheoir a bheith ag brath ar Airteagal 6(1)(f) RGCS chun leas dlisteanach a shaothrú agus sonraí pearsanta a phróiseáil i gcomhthéacs córais agus samhlacha IS a fhorbairt agus a úsáid. Tá an Coiste buartha, má thugtar isteach foráil shonrach le haghaidh próiseáil a bhaineann le IS, go bhfuil baol ann go n-ardófar leis an togra cineálacha áirithe athúsáide sonraí ar scála mór ó mheasúnú comhthéacsúil chuig catagóir próiseála dhleathaigh a aithnítear go struchtúrach. Tá an Coiste buartha go bhfuil baol ann go gcruthófar leis an togra toimhde go bhfuil oiliúint agus oibriú IS comhoiriúnach, mar réamhshocrú, do leas dlisteanach an rialaitheora agus go bhfuil baol ann go ndéanfar úsáid leathan sonraí pearsanta gan seiceálacha riachtanais agus comhréireachta atá sách láidir a normalú. Tá an Coiste buartha freisin faoin gceart chun cur i gcoinne próiseáil leasa dhlisteanach a dhéantar chun críoch IS. Tá an Coiste buartha gurb amhlaidh, i gcomhthéacs nach eol do roinnt mhaith daoine aonair go

bhfuil a sonraí ionchorpraithe i bpíblínte oiliúna IS, a chreimtear ceart an duine aonair chun agóid a dhéanamh.

- h. Tá an Coiste buartha go bhfuil baol ann go lagófar leis an togra cosaintí le haghaidh sonraí catagóire speisialta i gcás ina n-úsáidtear é agus oiliúint á cur ar chórais IS. Tugann an Coiste faoi deara go leantar de bheith á chur de cheangal ar rialaitheoirí bearta teicniúla agus eagraíochtúla a chur chun feidhme ionas nach bpróiseálfar sonraí catagóire speisialta agus tugann sé faoi deara, thairis sin, go gceanglaítear ar rialaitheoirí na sonraí sin a bhaint nuair a shainaithnítear iad laistigh de chórais IS mura rud é go bhfuil gá le hiarracht dhíríreach chun iad a bhaint. Tá an Coiste buartha go bhfuil baol ann go ndéanfar an cur chuige a aisiompú leis an togra lena dtoirmeasctar, mar riail, sonraí catagóire speisialta a phróiseáil i dtreo glacadh le láithreach sonraí catagóire speisialta laistigh de chórais IS. Tá an Coiste buartha go bhfuil baol ann, thairis sin, go mbeidh an méid sin achrannach in imthosca ina gceadaítear le leasuithe beartaithe ar an nGníomh um Intleacht Shaorga sonraí catagóire speisialta a phróiseáil chun claontacht a bhrath agus a cheartú i gcórais IS. Tá an Coiste buartha, thairis sin, go bhfuil baol ann go ndéanfar coinneáil sonraí pearsanta atá íogair a normalú, i bhfabhar bharrfheabhsú chórais IS. Tá an Coiste buartha, thairis sin, go bhfuil baol ann go bhféadfadh éiginnteacht dhlíthiúil teacht chun cinn de dheasca spleáchas ar iarracht dhíríreach mar chaighdeán nuair nach féidir le daoine aonair a thuar go réasúnach cathain a bhainfear nó a choinneofar a sonraí catagóire speisialta, go háirithe i bhfianaise fhorálacha claontachta beartaithe an Ghnímh um IS.
- i. Tugann an Coiste dá aire, ós rud é go maítear go bhfuil an togra de chineál teicniúil, nach bhfuil measúnacht tionchair iomlán mar bhonn taca faoi, dá bhrí sin, i gcomhréir leis na treoirlínte maidir le Rialáil níos Fearr. A mhéid a mheasann an Coiste go bhfuil baol ann go mbeidh níos mó ná leasuithe teicniúla amháin i gceist le bearta áirithe atá

laistigh den togra, tá an Coiste buartha gurb amhlaidh má théitear ar aghaidh gan tuarascáil iomlán ar an measúnú tionchair a ardaítear an baol go ndéanfar athruithe gan údar laistigh den togra.

4. Moltaí an Chomhchoiste

Molann an Coiste an méid seo a leanas: -

- a. Tuilleadh breithnithe a dhéanamh ar thogra reachtach iomlán a úsáid a bhfuil tuarascáil iomlán ar an measúnú riosca mar thaca leis lena ngabhann tréimhsí comhairliúcháin leordhóthanacha agus ceanglais fhianaiseacha chun go dtabharfar isteach na gnéithe den togra a bhfuil baol ann go mbeidh níos mó i gceist leo ná leasuithe teicniúla amháin, agus ina ionad sin, a bhfuil an baol ann go ndéanfar athruithe substaintiúla ar na rialacha lena rialaítear cosaint sonraí leo.
- b. Tuilleadh breithnithe a dhéanamh ar na cinntí a rinne Cúirt Bhreithiúnais an Aontais Eorpaigh le déanaí a mhiondealú chun maolú a dhéanamh ar an mbaol go mbainfeadh míbhrí as measúnuithe cás-sonracha nó go ndéanfar iad a chódú i sásra rialála ginearálta.
- c. Bearta neamhreachta a shaothrú ar bhealach níos bríomhaire, lena n-áirítear treoir phraiticiúil, rannpháirteachas páirtithe leasmhara agus tacaíocht bhreise a eisiúint amhail teimpléid agus seicliostaí lena féidir níos mó soiléire a sholáthar ar RGCS agus laghdú a dhéanamh ar an ngá le bearta reachtacha, lena gcuirtear athrú substaintiúil i mbaol, a shaothrú.

Matt Carthy

Matt Carthy, T.D.
Cathaoirleach
07 Bealtaine 2026

AGUISÍN 1 – Comhaltas an Choiste

An Cathaoirleach

[Matt Carthy TD](#), Sinn Féin

An Leas-Chathaoirleach

[Paula Butterly TD](#), Fine Gael

Comhaltaí

[Tomás Brabazon TD](#), Fianna Fáil

[Cáit Ní Cheallacháin TD](#), Fine Gael

[Albert Ó Dólaín TD](#), Fianna Fáil

[Gary Gannon TD](#), Na Daonlathaithe Sóisialta

[Alan Kelly TD](#), Páirtí an Lucht Oibre

[Pádraig O'Sullivan TD](#), Fianna Fáil

[Mark Ward TD](#), Sinn Féin

[An Seanadóir Robbie Gallagher](#), Fianna Fáil

[An Seanadóir Garret Kelleher](#), Fine Gael

[An Seanadóir Michael McDowell](#), Neamhspleách

[An Seanadóir Anne Rabbitte](#), Fianna Fáil

[An Seanadóir Lynn Ruane](#), Neamhspleách

AGUISÍN 2 – Faisnéis an Choiste

Físeáin choiste

Is féidir teacht ar pháis scannánaíochta d'imeachtaí an Choiste ar [leathanach físeán an Choiste](#).

Díospóireachtaí coiste

Is féidir teacht ar thras-scríbhinní dhíospóireachtaí an Choiste ar [leathanach dhíospóireachtaí an Choiste](#).

Sonraí teagmhála

Is féidir teacht ar shonraí teagmhála an Choiste ar [leathanach an Choiste](#).

Orduithe tagartha

Léigh na [hOrduithe tagartha](#) don Choiste.