



EUROPEAN COMMISSION

Directorate-General for Communications Networks, Content and Technology

Media and Data
Creativity

**IMPLEMENTATION OF
THE COMMISSION RECOMMENDATION
ON DIGITISATION AND ONLINE ACCESSIBILITY
OF CULTURAL MATERIAL AND DIGITAL PRESERVATION**

PROGRESS REPORT 2013-2015

**Please complete and return by e-mail to
Rachel.Soucher@ec.europa.eu no later than 30 October 2015**

Country	UK
----------------	-----------

Contact Details (info will not be published):

Name	Neil Fitzgerald
Organisation	The British Library
Telephone	+44 (0)20 7412 7053
Email	neil.fitzgerald@bl.uk

NOTE: This template follows the structure of the Recommendation of 27 October 2011 on the digitisation and online accessibility of cultural material and digital preservation. This template should be strictly followed.

The Commission Recommendation was endorsed by Council on its Conclusion of 12 May 2012. The priority actions and indicative timetable contained in these Conclusions should clearly be taken into account in your reporting of progress.

Please note that your report should focus on new developments in the reference period 2013-2015.

Please use the empty boxes underneath the questions to indicate your response/comments.

Besides your factual report, you are encouraged to raise any implementation problems or highlight any best practice examples to which you think special attention should be paid at national and/or European level. Where implementation is not fully reached, please describe how you plan to continue your work.

Please provide quantitative indicators on progress achieved, where applicable.

If no information is available for a question, please leave the corresponding box empty.

All reports will be published on the Commission's Digital Agenda for Europe website.

DIGITISATION: ORGANISATION AND FUNDING

1. PROGRESS ON PLANNING AND MONITORING THE DIGITISATION OF BOOKS, JOURNALS, NEWSPAPERS, PHOTOGRAPHS, MUSEUM OBJECTS, ARCHIVAL DOCUMENTS, SOUND AND AUDIO-VISUAL MATERIAL, MONUMENTS AND ARCHAEOLOGICAL SITES ("CULTURAL MATERIAL")

a. Setting clear quantitative targets for the digitisation of cultural material, in line with the overall targets mentioned under point 7, indicating the expected increase in digitised material in Europeana and the budgets allocated by public authorities

- Is a national strategy or other scheme in place for planning the digitisation of cultural material?

National strategy

National funding programme

Domain specific initiatives

Regional schemes

No specific scheme

Other

Please provide details of the **present** scheme, and any developments **since the last reporting period**.

While UK cultural organisations continue to be very active in the field of digitisation, there is no single plan or framework for the coordination and monitoring of digitisation of cultural material. Instead, digitisation activity is supported on an arms-length basis at several levels:

On an institutional level, individual museums, archives and libraries have developed digitisation policies and strategies specific to their collections and the needs of their audiences. These tend to be funded and driven locally, with some external funding support on a project basis.

On a regional level, groups of organisations are coordinating some aspects of digitisation activity amongst themselves.

On a national level, there is some coordination of digitisation on a thematic (as opposed to geographical) basis.

Within the Home Nations (Scotland, Wales and Northern Ireland) there are overarching cultural heritage policies which make reference to digitisation and online access to collections.

In the absence of a national digitisation plan or framework, there is no central point of commitment to supporting Europeana. Instead, each individual institution or collaborative partnership makes its own decision about the degree of

engagement with Europeana and other aggregation/syndication efforts.

- Are quantitative targets for the digitisation of cultural material set at national level?

Please provide details for the reference period 2013-2015 including any available figures on digitisation targets and allocated budgets/budget sources.

No quantitative targets for the digitisation of cultural material set at national level.

- Are qualitative targets for the digitisation of cultural material set at national level?

Please provide details of any **present** standards or guidelines, and any developments **since the last reporting period**.

No qualitative targets for the digitisation of cultural material set at national level.

b. **Creating overviews of digitised cultural material and contributing to collaborative efforts to establish an overview at European level**

- Is a national scheme or mechanism in place for monitoring the digitisation of cultural material?

Yes [] No [X]

If yes, please provide details.

- Has your country encouraged and supported the participation of cultural institutions to the [ENUMERATE](#) surveys for the establishment of a European-level overview of digitisation data? Please provide details of actions **within this reporting period**, any related figures, and/or plans to support contribution in upcoming surveys.

As part of the Europeana v3.0 project Collections Trust acted as the national coordinator for the continuing ENUMERATE surveying. Unfortunately, given importance, the response from UK organisations was very limited (c10), and therefore any figures would not be useful to add here. The lack of response was put down to the lack of compulsion to fill out the survey, and 'survey fatigue'. It is

hoped the situation in Europeana-DSI will improve any figures from the UK.

2. PROGRESS ON PARTNERSHIPS BETWEEN CULTURAL INSTITUTIONS AND THE PRIVATE SECTOR IN ORDER TO CREATE NEW WAYS OF FUNDING DIGITISATION OF CULTURAL MATERIAL AND TO STIMULATE INNOVATIVE USES OF THE MATERIAL, WHILE ENSURING THAT PUBLIC PRIVATE PARTNERSHIPS FOR DIGITISATION ARE FAIR AND BALANCED, AND IN LINE WITH THE CONDITIONS INDICATED IN ANNEX I

- Have cultural institutions in your country entered into PPPs (including also partnerships with non-EU partners) for digitisation or for facilitating the access to digital cultural heritage?

Yes [] No []

Please provide details of any major partnerships established **since the last reporting period**, compliance of the respective agreements with the conditions in Annex I of the Recommendation as well as contact details of the cultural institution involved.

As reported in previous biannual reports, the practice of Public Private Partnerships (PPP) is well-developed in the UK, with a particular emphasis on partnerships between national institutions (museums, archives and libraries) and private-sector partners with a specific interest in digital content and online services.

PPP arrangements tend to be a contractual matter between the institution and the partner, and hence no central register is kept of them. UK institutions have been aware of the Recommendation and best practice for PPP, but have also been careful to negotiate preferential arrangements during contract to promote access and sustainability.

3. PROGRESS ON MAKING USE OF STRUCTURAL FUNDS, WHERE POSSIBLE, TO CO-FINANCE DIGITISATION ACTIVITIES

- Is your country using, or planning to use, funding from the European Structural and Investment Funds for the period 2014-2020 for the digitisation of cultural material?

Yes [] No []

If yes, please provide details of specific programmes, or large-scale projects, and respective amounts.

We are not aware of any structural funding that is being applied to the digitisation of cultural material. The primary sources of investment in digitisation programmes in the UK continue to be Lottery funding, fundraising, and institutional budgets.

4. PROGRESS ON WAYS TO OPTIMISE THE USE OF DIGITISATION CAPACITY AND ACHIEVE ECONOMIES OF SCALE, WHICH MAY IMPLY THE POOLING OF DIGITISATION EFFORTS BY CULTURAL INSTITUTIONS AND CROSS-BORDER COLLABORATION, BUILDING ON COMPETENCE CENTRES FOR DIGITISATION IN EUROPE.

- Has your country developed ways to optimise the use of digitisation capacity and achieve economies of scale, through pooling of digitisation efforts or cross-border collaboration?

Yes [] No [X]

Please provide details of any developments or best practice examples of national, or cross-border, collaboration **within this reporting period.**

There is a growing interest in UK for using shared services to achieve economies of scale and pooling of expertise in a number of the end-to-end digitisation workflow pipeline aspects, e.g. the Wellcome Library is developing a proof of concept for a [Digital Cloud Library System](#) for its own purposes which it has opened for others to participate in.

DIGITISATION AND ONLINE ACCESSIBILITY OF PUBLIC DOMAIN MATERIAL

5. PROGRESS ON IMPROVING ACCESS TO AND USE OF DIGITISED CULTURAL MATERIAL THAT IS IN THE PUBLIC DOMAIN

a. Ensuring that material in the public domain remains in the public domain after digitisation

- Has your country encountered obstacles in the process of ensuring that material in the public domain stays in the public domain after digitisation? How do cultural institutions in your country take up the Europeana Public Domain Charter? Please provide details of the **present** situation and any developments **within this reporting period**.

The UK has implemented revisions to the PSI Directive. This means that level playing field terms and conditions should be applied to those wishing to reuse the public domain collections of cultural bodies.

Given the reductions in public sector financing that cultural bodies in the UK are subject to a number of organisations are having to commercialise public domain items in order to create revenue streams.

b. Promoting the widest possible access to digitised public domain material as well as the widest possible reuse of the material for non-commercial and commercial purposes

- Are there projects or schemes for promoting the widest possible access to and reuse of digitised public domain material? Please provide details of any developments **within this reporting period**.

There are no national schemes within this reporting period.

- What experience has your country been able to gather concerning the re-use of digitised public domain material for non-commercial or commercial purposes? Please provide details of **any best practice examples within this reporting period**. Please also indicate whether there are mechanisms for monitoring such reuse (take-up by organisations engaging in re-use and take-up by end-users/visitors).

In 2014, the Digital Scholarship Team at the British Library partnered with the Technology Strategy Board and IC Tomorrow, in a [Digital Innovation Contest](#) to encourage and establish a feedback loop for tracking and measuring the use and impact of public domain content made available online. A successful proof of concept was developed with outcomes and next steps are currently under

consideration.

In early 2013 the British Library established [British Library Labs](http://britishlibrary.typepad.co.uk/digital-scholarship/bl-labs/) with Andrew W. Mellon Foundation funding to support and inspire the public reuse of digital collections and data in exciting and innovative ways, this has included an annual competition, the release of 1 million images onto Flickr, and numerous collaborative projects: <http://britishlibrary.typepad.co.uk/digital-scholarship/bl-labs/>

c. Taking measures to limit the use of intrusive watermarks or other visual protection measures that reduce the usability of the digitised public domain material.

- Are measures to limit the use of watermarks or other visual protection measures reducing the usability of digitised public domain material in place?

Yes [] No [X]

Please provide details of any developments **since the last reporting period..** Where applicable, please also indicate best/worst practice examples.

DIGITISATION AND ONLINE ACCESSIBILITY OF IN-COPYRIGHT MATERIAL

6. IMPROVE CONDITIONS FOR THE DIGITISATION AND ONLINE ACCESSIBILITY OF IN-COPYRIGHT MATERIAL.

a. Rapid and correct transposition and implementation of the provisions of the Directive on orphan works

- Has your country adopted legislation to transpose the Directive on orphan works?

Yes [X] No []

Please provide details of any developments **since the last reporting period.**

In 2014 the UK transposed the Orphan Works Directive as well introduced a licensing scheme for the reuse of orphan works for commercial purposes. The latter scheme also allows for the licensing of orphan works which are stand-alone artistic works that are excluded from the Directive, as well as for the licensing of unpublished materials which are largely excluded from the Directive.

b. Legal framework conditions to underpin licensing mechanisms identified and agreed by stake-holders for the large-scale digitisation and cross-border accessibility of works that are out-of commerce.

- Are there any legal/voluntary stakeholder-driven schemes in your country to underpin the large- scale digitisation and cross-border accessibility of out-of-commerce works?

Yes No

Please provide details of any developments **since the last reporting period** (including schemes, references and impact).

In 2014 the UK government introduced a general Extended Collective Licence (ECL), although as yet no collecting society has applied to operate in extended mode.

The cultural sector's view is that the overly complex way ECL has been introduced in the UK means that it is unlikely to facilitate any large scale-digitisation.

Extended Collective Licensing does not allow access to the works of non-members from abroad which is why geo-blocking is common in other ECL countries like Norway and Denmark.

c. Contributing to and promoting the availability of databases with rights information, connected at the European level, such as ARROW.

- Is your country contributing and promoting the availability of such databases at the European level?

Yes No

Please provide details of any developments **since the last reporting period**.

ARROW has no platform or process publicly available to cultural sector bodies in the UK.

EUROPEANA

7. PROGRESS ON CONTRIBUTION TO THE FURTHER DEVELOPMENT OF EUROPEANA

- a. Encouraging cultural institutions as well as publishers and other right holders to make their digitised material accessible through Europeana, thus helping the platform to give direct access to 30 million digitised objects by 2015, including two million sound or audio-visual objects
- Please provide details of any developments, or best practice examples, **within this reporting period.**

As a country, there is no national coordinated effort to encourage cultural institutions, publishers and other rights holders to make material accessible to Europeana. The Collections Trust and the British Library remain the primary channels for the promotion of Europeana in the UK. No additional resources have been made available for this work, and there is no overall policy mandate or directive promoting engagement in Europeana.

In the absence of this broader policy commitment, it has been necessary to focus on the promotion of Europeana as a benefit to cultural heritage institutions. There are no current specific measures to encourage the contribution of sound or audio-visual material at a policy level although UK institutions – notably the British Library – are leading on large-scale EU-funded projects like [Europeana Sounds](#) which will contribute a very significant quantity of audio material.

- Please provide figures concerning the contribution of your country to Europeana with regards to the indicative targets for minimum content contribution by 2015, as set at Annex II of the Recommendation.

At the end of October 2015 there were 3,205,784 records in Europeana from the UK. This represents 81% of the target. However there will be some additional records, particularly from the [Europeana Sounds](#) project with 110,000 UK records (out of an expected 500K) and other projects which will mean the UK will exceed the target.

- Are there known obstacles that have prevented your country from reaching the indicative targets for 2015? **(if relevant)**

Public sector spending reductions have meant that cultural sector bodies are more likely to be more focussed on revenue generation activities than contributing to Europeana.

b. Making all public funding for future digitisation projects conditional on the accessibility of the digitised material through Europeana.

- Please provide details of any steps taken, or best practice examples, **within this reporting period.**

No measures have been put in place to make contribution to Europeana a condition of funding. Instead, some conditions have been created requiring funded projects (notably through the Heritage Lottery Fund) to make digital content freely available for distribution and re-use. These conditions are broadly compatible with the requirements of the Europeana Data Exchange Agreement.

c. Ensuring that all their public domain masterpieces will be accessible through Europeana by 2015,

- Please provide details of any steps taken, or best practice examples, **within this reporting period.**

No measures are currently in place to ensure that public domain masterpieces will be available through Europeana by 2015.

d. Setting up or reinforcing national aggregators bringing content from different domains into Europeana, and contributing to cross-border aggregators in specific domains or for specific topics, which may bring about economies of scale

- Is a national aggregator bringing content from different domains into Europeana present in your country?

Yes No

- Please provide details of any developments, **within this reporting period**, concerning national aggregators, participating organisations and content domains covered.

The UK national aggregator Culture Grid (www.culturegrid.org.uk) continues to be in operation. It currently provides access to over 3m metadata records and images from more than 150 museum, library and archive collections.

- Please provide details of any developments or best practice examples, **within this reporting period**, concerning contribution to cross-border aggregators in specific domain or for specific topics.

- e. Ensuring the use of common digitisation standards defined by Europeana in collaboration with the cultural institutions in order to achieve interoperability of the digitised material at European level, as well as the systematic use of permanent identifiers
- Please provide details of any steps taken, or best practice examples, **within this reporting period**, to ensure the use of common digitisation and metadata standards to achieve interoperability at European level.

A number of UK institutions have been working with international partners over the last reporting period to establish the [International Image Interoperability Framework \(IIIF\)](#) which aims to collaboratively increase access to image resources worldwide, the [IIIF Consortium](#) was formally formed in 2015.

- Please provide details of any developments or best practice examples, within this reporting period, concerning the systematic use of permanent identifiers.

[Archival Resource Key \(ARK\) identifiers](#) have been adopted by a number of UK institutions including the British Library as an assigning authority, there are now approximately 317 organisations spread across 15 countries registered to assign ARKs to support long term access to information objects:
http://www.cdlib.org/uc3/naan_table.html

- f. Ensuring the wide and free availability of existing metadata (descriptions of digital objects) produced by cultural institutions, for reuse through services such as Europeana and for innovative applications
- Which steps has your country taken to ensure the free availability of existing metadata? How do cultural institutions in your country take up the Europeana Data Exchange Agreement? Please provide details of any developments or best practice examples, **within this reporting period**.

Following the UK government response to the Shakespeare Review of June 2013, the UK government set out its aim to create a [National Information Infrastructure \(NII\)](#). The NII will contain the data held by government which is likely to have the broadest and most significant economic and social impact if made available and accessible outside of government where possible, this includes the [Linked Open British National Bibliography](#).

For cultural organisations there has been a significant shift away from providing data to specific points of aggregation and towards the implementation of APIs which make the data accessible to a wide range of different platforms and services. Hence, instead of making legacy metadata specifically available for Europeana, cultural heritage institutions have elected to make it available for a range of uses, which may include Europeana.

- What experience has your country been able to gather concerning the re-use of free metadata, through services such as Europeana or for innovative applications? Please provide details of **any best practice examples within this reporting period.**

A number of UK institutions, including the British Library, have been experimenting with the provision of free metadata and making the [data available in a variety of formats](#) to support reuse by researchers.

- g. Establishing a communication plan to raise awareness of Europeana among the general public and notably in schools, in collaboration with the cultural institutions contributing content to the site
- Please provide details of any developments or best practice examples, **within this reporting period.**

There are no overarching measures to raise awareness of Europeana. Instead, UK organisations (notably the Collections Trust and the British Library) are active participants in EU-funded projects such as [Europeana 1914-1918](#), and are able to use their existing communications channels and networks to raise general awareness, e.g. <http://www.bl.uk/world-war-one>.

DIGITAL PRESERVATION

8. REINFORCE NATIONAL STRATEGIES FOR THE LONG-TERM PRESERVATION OF DIGITAL MATERIAL, UPDATE ACTION PLANS IMPLEMENTING THE STRATEGIES, AND EXCHANGE INFORMATION WITH EACH OTHER ON THE STRATEGIES AND ACTION PLANS.

- Does your country have a strategy for the long-term preservation of digital material? What actions are you planning to implement the strategy? Have you exchanged information with other Member States in order to devise your strategy and action plan? Please provide details of **any developments since the last reporting period.**

While there is no national strategy for the long-term preservation of digital material, considerable efforts are being made to address the sustainability of digital cultural content on a distributed basis. Both the British Library and the National Archives are founding members of the [Digital Preservation Coalition](#) (DPC), a UK-based organization with the remit of helping members advance their digital preservation knowledge and solutions as part of a wider community. The DPC led organization of a major digital preservation conference in the UK in 2014, and runs the bi-annual [Digital Preservation Awards](#). The British Library is a founding member of the [Open Preservation Foundation](#), and both the British Library and National Archives are also active in the [International Internet Preservation Consortium](#) (IIPC). The [British Library's Digital Preservation Strategy](#) is available online and directs the work of the Library in developing digital preservation capacity. The National Archives provide advice on their website on development of a digital preservation strategy.

The British Library worked with other Member States as part of the EU funded [SCAPE Project](#) and [APARSEN Project](#), both of which ran between 2011-2014.

The British Library is represented on the programme committees of the [International Digital Curation Conference](#) (IDCC) and the [iPres conference](#), the latter as co-chair in 2015. The Library is working closely with colleagues in a small number of Member States, as well as Australasia, to further advance shared aspects digital preservation infrastructure.

9. EXPLICIT AND CLEAR PROVISION IN YOUR COUNTRY'S LEGISLATION SO AS TO ALLOW MULTIPLE COPYING AND MIGRATION OF DIGITAL CULTURAL MATERIAL BY PUBLIC INSTITUTIONS FOR PRESERVATION PURPOSES, IN FULL RESPECT OF EUROPEAN UNION AND INTERNATIONAL LEGISLATION ON INTELLECTUAL PROPERTY RIGHTS.

- Have your country made explicit and clear provision in its legislation to allow multiple copying and migration of digital cultural material by public institutions for preservation purposes? Please provide details of **any developments since the last reporting period.**

Yes. In 2014 UK copyright law was updated to allow multiple copying and migration of digital cultural material by public institutions for preservation purposes. However, migration is not the only preservation solution and support for emulation is less clear as the current UK legislation does not explicitly state the software/[representative information](#) required to interpret the digital resources is in scope. This part is most closely related

(<http://www.legislation.gov.uk/ukxi/2013/777/regulation/17/made>), but the wording implies any software, keys or documentation must come from the publisher themselves. It would be beneficial if legislation to support digital preservation was widened to bring dependencies held by third-parties into scope (at least those that are publically available). If software was brought directly in scope under Non-Print Legal Deposit (NPLD) this would also improve solutions available for digital preservation purposes.

10. MAKE THE NECESSARY ARRANGEMENTS FOR THE DEPOSIT OF MATERIAL CREATED IN DIGITAL FORMAT IN ORDER TO GUARANTEE ITS LONG-TERM PRESERVATION, AND IMPROVE THE EFFICIENCY OF EXISTING DEPOSIT ARRANGEMENTS FOR MATERIAL CREATED IN DIGITAL FORMAT.

- a. Ensuring that right holders deliver works to legal deposit libraries without technical protection measures, or that, alternatively, they make available to legal deposit libraries the means to ensure that technical protection measures do not impede the acts that libraries have to undertake for preservation purposes, in full respect of European Union and international legislation on intellectual property rights.
- What arrangements has your country made to ensure that technical protection measures do not impede the acts that libraries have to undertake to guarantee long-term preservation of material created in digital format? Please provide details of **any developments since the last reporting period**.

Guidance provided on the Legal Deposit Libraries (Non-Print Works) Regulation 2013 state:

The regulations provide that the publisher must deliver, in relation to off line work and on line work with an agreed method of delivery:

- a copy of any computer program and any information necessary to access the work including any information required to allow a reader to read the work;
- a copy of any manual or other material that accompanies the work and is made available to the public.

This is intended to cover any additional material, such as computer programs or manuals/guides, which are published to accompany off line formats such as CD ROMs. It would also cover any Technical Protection Measures that apply to off line works. It is also intended to cover any programs or information which is necessary to access on line work delivered in a manner agreed between the publisher and the deposit library. This provision does not cover work which is web harvested as it is not considered that additional programs or material will be relevant to such work.

- b. Where relevant, making legal provision to allow the transfer of digital legal deposit works from one legal deposit library to other deposit libraries that also have the right to these works.
- Has your country made legal provision to allow the transfer of digital legal deposit works from one legal deposit library to other deposit libraries that also have the right to these works? Please provide details of **any developments since the last reporting period**.

Yes, delivered material is made available to all deposit libraries. Specifically the regulations state:

Access to non-print works that have been delivered to the deposit libraries under the regulations is restricted to computer terminals on premises controlled by the deposit libraries. In the case of legal publications delivered to the National Library of Scotland, access will also be available from the Facility of Advocates' library, in line with current arrangements for access to legal publications in print format. There are no restrictions on how many computer terminals a deposit library may have. The computer terminals, however, must be situated on premises controlled by the deposit libraries and only readers who are on premises controlled by the deposit libraries can be allowed access to (i.e. can view) the work on a computer terminal.

- c. Allowing the preservation of web-content by mandated institutions using techniques for collecting material from the Internet such as web-harvesting, in full respect of European Union and international legislation on intellectual property rights.
- What measures has your country adopted to allow preservation of web-content by mandated institutions? Please provide details of **any developments since the last reporting period**.

An overview of the work of the UK Web Archive was given at the 2015 IIPC General Assembly: <http://britishlibrary.typepad.co.uk/webarchive/2015/09/ten-years-of-the-uk-web-archive-what-have-we-saved.html>

11. TAKING INTO ACCOUNT DEVELOPMENTS IN OTHER MEMBER STATES, WHEN ESTABLISHING OR UPDATING POLICIES AND PROCEDURES FOR THE DEPOSIT OF MATERIAL ORIGINALLY CREATED IN DIGITAL FORMAT, IN ORDER TO PREVENT A WIDE VARIATION IN DEPOSITING ARRANGEMENTS.

- How is your country taking into account developments in other Member States in order to prevent a wide variation in deposition arrangements? Please provide details of **any developments since the last reporting period**.

IS THE RECOMMENDATION UP TO DATE AND FIT FOR PURPOSE?

THE RECOMMENDATION IS A NON-BINDING EU LEGAL ACT WHOSE PURPOSE IS TO COORDINATE, SUPPLEMENT AND SUPPORT MS' ACTIONS IN AN AREA WHERE THE EU HAS NO CENTRAL COMPETENCE. IN THIS CONTEXT:

- What are your views on the overall usefulness of the Recommendation as an instrument to improve conditions, in the areas addressed therein, in your country?

In the UK context recommendations relating to the law are ineffective. UK cultural sectors and copyright holders are unwilling to commit unlawful acts in terms of copyright law on the basis of recommendations.

- Which provisions of the Recommendation do you consider to have had high impact in your country?

- Which provisions of the Recommendation do you consider to have had low impact in your country?

Memorandum of Understanding on Out of Commerce Works.

- Would the Recommendation benefit from an update to enhance its impact or bring it up to date with current challenges so that it remains relevant in the coming years? Please provide your suggestions or comments with respect to specific provisions or in general.

ANY OTHER BUSINESS

- Please indicate in the box below any suggestions or other comments you would like to make, or any further information you consider of use for the purposes of this progress report and/or the further implementation of the Recommendation.