



Questionnaire
Open Public Consultation
Business or private organisation

Open Public consultation: Revision of the European Interoperability Framework

Introduction

In October 2015, the European Commission has launched the work on an Impact Assessment for the revision of the European Interoperability Strategy ([EIS](#)) and the European Interoperability Framework ([EIF](#)). On the one hand, the EIS aimed to provide guidance and to prioritise actions needed to improve interaction, exchange and cooperation among European public administrations across borders and across sectors for the delivery of European public services. On the other hand, the purpose of the European Interoperability Framework (EIF) was a) to promote and support the delivery of European public services by fostering cross-border and cross-sector interoperability, b) to guide public administrations in their work to provide European public services to businesses and citizens and c) to complement and tie together the various National Interoperability Frameworks (NIFs) at European level.

The general objective is to ensure that a coherent vision on interoperability exists in the EU in relation to interactions between the European public administrations (hereinafter the term "public administrations" will also include organisations acting on their behalf) and between them and citizens and businesses. This can be done through updating and extending the EIF and updating the EIS by reviewing the current Communication "Towards interoperability for European public services", [COM \(2010\)744](#).

The review is deemed necessary in order a) to align with the recent policy development, i.e. the Digital Single Market (DSM) policy, the revised Directive on the reuse of Public Sector Information, etc., b) to align with emerging technological trends (cloud computing, big and open data, etc.) and c) to put more focus on the implementation of the EIF rather than the simple alignment with the national approaches on interoperability.

ISA², a programme on "Interoperability solutions and common frameworks for European public administrations, businesses and citizens" adopted on 25 November 2015 ([Decision \(EU\) 2015/2240](#)) will be the principal instrument to implement the EIS and EIF for the next 5 years.

Completing the survey should not take more than 30 minutes.

Accessibility matters to us. If you have difficulty in accessing this online consultation, please find here attached an [accessible Word version](#), which you can complete offline and return to the following email address: DIGIT-ISA2-CONSULTATIONS@ec.europa.eu.

The privacy statement, available [here](#), outlines in detail how the data that you provide as part of this questionnaire will be protected.

In case you need any additional information about this Impact Assessment, please do not hesitate to contact DG DIGIT B6 directly by addressing an email to the following address: DIGIT-ISA2-CONSULTATIONS@ec.europa.eu

1. Registration

I am responding: *

- As an individual Citizen, on behalf of myself only
 On behalf of a Business or private organisation
 On behalf of a Public Administration
 On behalf of a Research centre/Academia/Standardisation organisation/Business supplying services to public administrations

Surname:*

Radoi

Name:*

Raul

Email address:*

info@cnue.be

What is your nationality?*

- | | | | | | |
|-----------------------------------|--|-------------------------------------|-------------------------------------|------------------------------------|------------------------------------|
| <input type="checkbox"/> Austrian | <input type="checkbox"/> Belgian | <input type="checkbox"/> British | <input type="checkbox"/> Bulgarian | <input type="checkbox"/> Croatian | <input type="checkbox"/> Cypriot |
| <input type="checkbox"/> Czech | <input type="checkbox"/> Danish | <input type="checkbox"/> Dutch | <input type="checkbox"/> Estonian | <input type="checkbox"/> Finnish | <input type="checkbox"/> French |
| <input type="checkbox"/> German | <input type="checkbox"/> Greek | <input type="checkbox"/> Hungarian | <input type="checkbox"/> Icelandic | <input type="checkbox"/> Irish | <input type="checkbox"/> Italian |
| <input type="checkbox"/> Latvian | <input type="checkbox"/> Liechtensteiner | <input type="checkbox"/> Lithuanian | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Maltese | <input type="checkbox"/> Norwegian |
| <input type="checkbox"/> Polish | <input type="checkbox"/> Portuguese | <input type="checkbox"/> Romanian | <input type="checkbox"/> Slovakian | <input type="checkbox"/> Slovenian | <input type="checkbox"/> Spanish |
| <input type="checkbox"/> Swedish | <input type="checkbox"/> Other | | | | |

[If 'Other' is ticked] Please specify your nationality.*

The Council of the Notariats of the European Union (CNUE) is a non-profit association under Belgian law (asbl).

[If 'A business or private organisation' is ticked] What is the name of your business/ private organisation?*

Council of Notariats of the European Union (CNUE)

My business/ private organisation is in:*

- | | | | | | |
|------------------------------------|---|-----------------------------------|-------------------------------------|----------------------------------|---|
| <input type="checkbox"/> Austria | <input checked="" type="checkbox"/> Belgium | <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Croatia | <input type="checkbox"/> Cyprus | <input type="checkbox"/> Czech Republic |
| <input type="checkbox"/> Denmark | <input type="checkbox"/> Estonia | <input type="checkbox"/> Finland | <input type="checkbox"/> France | <input type="checkbox"/> Germany | <input type="checkbox"/> Greece |
| <input type="checkbox"/> Hungary | <input type="checkbox"/> Iceland | <input type="checkbox"/> Ireland | <input type="checkbox"/> Italy | <input type="checkbox"/> Latvia | <input type="checkbox"/> Liechtenstein |
| <input type="checkbox"/> Lithuania | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Malta | <input type="checkbox"/> Netherland | <input type="checkbox"/> Poland | <input type="checkbox"/> Portugal |
| <input type="checkbox"/> Romania | <input type="checkbox"/> Slovakia | <input type="checkbox"/> Slovenia | <input type="checkbox"/> Spain | <input type="checkbox"/> Sweden | <input type="checkbox"/> United Kingdom |
| <input type="checkbox"/> Norway | <input type="checkbox"/> Other | | | | |

[If 'Other' is ticked] Please specify in which country your business/ private organisation is.*

[If 'A business or private organisation' is ticked] What is your function in your business/ private organisation?*

Secretary general

[If 'A business or private organisation' is ticked] If you represent other business (es)/ private organisation(s), please specify how many*.

The Council of the Notariats of the European Union (CNUE) is the official body representing the notarial profession in dealings with the European institutions. Speaking for the profession, it negotiates and makes decisions for the European Union's notariats.

The CNUE represents the 22 notariats of all EU Member States familiar with this institution: Austria, Belgium, Bulgaria, Croatia, the Czech Republic, Estonia, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia and Spain. Turkey has observing member status.

[If 'A business or private organisation' is ticked] What is the total number of permanent employees in your business/ private organisation? *

- 1 - 9
- 10 - 49
- 50 – 249
- >250

[If 'A business or private organisation' is ticked] At what level does your business/ private organisation operate?*

- International
- EU
- National
- Regional
- Local

[If 'A business or private organisation' is ticked] Is your business/ private organisation in the EU's Transparency Register? *

- Yes
- No

[If 'Yes'] Please specify its Transparency Register Number*.

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If you are not answering this questionnaire as an individual, please register in the [Transparency Register](#). If your business/ private organisation responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.

[If 'A business or private organisation' is ticked] Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Strategy and its content.*

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know/No opinion

If ‘A business or private organisation’ is ticked] Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Framework and its content.*

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know/No opinion

[If ‘A business or private organisation’ is ticked] Has your business/ private organisation used electronic public services provided by your country's administrations in 2015?*

- Yes
- No
- Don't know/No opinion

[If ‘Yes’ is ticked] Which electronic public services has your business/ private organisation used the most frequently?*

At national level, there are numerous electronic public services used by the notariats. At CNUE level, we have implemented various projects, such as the interconnection of registers of wills through ARERT, that constitute electronic services.

2. Publication consent

Please indicate your preference for the publication of your response on the Commission’s website:*

- Under the name given:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential.** (it will not be published, but will be used internally within the Commission)

3. Accompanying document

The document accessible [here](#) is a draft version of the revised European Interoperability Framework (EIF). While still being under continuous improvement by the Commission Services, it already reflects the results of a targeted consultation with the Member States representatives to ISA programme (the predecessor of ISA²), as well as other inputs.

The EIF is a technical document, mainly addressing recommendations on interoperability, based on an [existing framework](#) and as such is herewith consulted with stakeholders. It mainly addresses recommendations on interoperability, the wording and impact of which are assessed through this consultation's questions. You are thus invited to familiarise yourselves with this draft EIF, so as to better understand the context of the questions. You will have the possibility to provide your feedback by answering this consultation's questions as well as through a free comment box available at the end of section 5 of this consultation.

4. Need of revising the EIS and EIF

In December 2010, the Commission adopted the Communication “Towards interoperability for European public services”¹ that included the European Interoperability Strategy² (EIS) and European Interoperability Framework³ (EIF).

Following recent political, legal and technological evolutions, a revision is now necessary so that interoperability is ensured for the public services of the Digital Single Market and that e-barriers do not emerge between the public administrations of the Member States to the detriment of other public administrations, businesses and citizens that need to interact with them.

Questions included in the following sections will focus, on the one hand, on interoperability at Member States’ (national) level and, on the other hand, on interoperability at cross-border level.

4.1. Assessment of needs and problems

The following set of questions will address [interoperability at Member State level](#), i.e. between your business/ private organisation and public administrations entities in your country, [and at EU level](#).

Q1. [On behalf of a business or private organisation] To what extent is it important for your business/ private organisation to interoperate with public administrations in your country?*

- Not at all important
- Rather not important
- Neither important nor unimportant
- Rather important
- Very important
- Don’t know / No opinion

Please feel free to comment on your answer.

Q2. [On behalf of a business or private organisation] To what extent is it important for your business/ private organisation to interoperate with other public administrations in the EU?*

- Not at all important
- Rather not important
- Neither important nor unimportant
- Rather important
- Very important
- Don’t know / No opinion

¹ COM(2010) 744 final, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Towards interoperability for European public services, Brussels, 16.12.2010.

² COM (2010) 744 final: Annex 1 to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of Regions Towards interoperability for European public services, Brussels, 16.12.2010.

³ COM (2010) 744 final: Annex 2 to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of Regions Towards interoperability for European public services, Brussels, 16.12.2010.

Please feel free to comment on your answer.

Q3. [On behalf of a business or private organisation] In your view, what are the main problems, if any, faced by your business/ private organisation when using digital public services provided by European public administrations, at national or cross-border levels?*

- Not all digital public services are exposed for use by our IT systems, so manual work is still needed
- Different digital public services exposed for use by our IT systems are using different standards (lack of a common approach for standards and specifications at national level)
- There is no one single portal through which we can access all digital public services.
- The public services are not all fully digitised. We have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- Published information is not complete, not concise enough, outdated or irrelevant
- We face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Information is not sufficiently translated in the language of our interest
- We have to submit, although electronically, the same data many times when using different digital services
- We have to use different ways of authenticating ourselves for the different digital services we are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know/No opinion

[If 'Other' is ticked] Please describe the other problems faced by your business/ private organisation when using digital public services nationally or cross-border.

5. Revision of both the EIS and the EIF

The “revision and extension” of the EIF is part of the Roadmap for the implementation of the Digital Single Market. In parallel, the Commission will propose a strategy, the EIS, to ensure that the EIF recommendations are addressed through concrete actions.

This section of the survey will shape the elements to be included in the revised EIF. It will also identify the priorities to be tackled by the EIS.

5.1. Assessment of the revision of the EIS

Q4. [On behalf of a business or private organisation] How important would it be for your business/ private organisation to benefit from interoperable digital public services, at national and EU levels, by 2020? *

- Not at all important
- Rather not important
- Neither important nor unimportant
- Rather important
- Very important
- Don't know / No opinion

[If ‘Not at all important’ or ‘Rather not important’ are ticked] Please explain the reasons why you do not consider this statement as important. *

[If ‘Neither important nor unimportant’ are ticked] Please feel free to comment on your answer.

Q5. [On behalf of a business or private organisation] Please indicate the level of importance of the following actions, when these apply in your own country, with regard to the benefits that they will generate for your business/ private organisation. *

Actions	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Ensure users' involvement in the design of national public services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Support activities related to security and data protection issues of public services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Actions	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
6. Ensure that data is transferrable between public services without restrictions, with respect to data protection and security rules	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[If not all actions rated with “Very important” or “Rather important”] Please indicate the reasons why some actions are not considered as important by your business/ private organisation. *

6. Data transferability between public services should always respect data protection rules and the security of the data transferred must be guaranteed at all times.

Q6. [On behalf of a business or private organisation] Are there any additional important actions that could result in better interoperability between your organisation and public administrations in your country?*

- Yes
 No
 Don't know/ No opinion

[If 'Yes' is ticked] Please further detail the proposed additional actions.*

Q7. [On behalf of a business or private organisation] Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate in the context of cross-border interoperability between your organisation and administrations located in other EU Member States.*

Actions	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Ensure users' involvement in the design of European public services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Support activities related to the description, organisation and availability of catalogues of European and national public services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Support activities related to security and data protection issues of public services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Ensure that data is transferrable between the European public services without restrictions, with respect to data protection and security rules	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[If not all actions rated with “Very important” or “Rather important”] Please indicate the reasons why some actions are not considered as sufficiently important by your organisation. *

2. Cross-border access to and interoperability of certain registers bear high risks. Indeed, registration procedures and therefore the quality of the data registered as well as its legal value varies widely from one Member State to the other (for example, as far as the real estate register is concerned, in some Member States, anyone can register information without preventive controls, while in other Member States, such as Germany or Austria, registrations are made only after previous verification by a Court or another public authority, which leads to a much higher quality and guarantee of accuracy of the registration. The legal value of registrations also varies significantly: for instance, in some states, good faith in the accuracy of registrations is protected (as a consequence of the extensive verification procedures previous to registration), while in other states, there is no such good faith protection). Likewise, in many countries, national registers are held by notarial bodies, providing reliable information, for example, in the fields of successions, powers of attorney and family law (Belgium, France, Hungary, Romania, etc.). Some of the registers are already interlinked at European level and high-quality standards and respect of national legislations are essential for the availability of reliable information abroad. In addition, legal concepts vary widely from one Member States to another. Considering this, the European institutions should in their reflexions ensure that any risk is avoided relating to cross-border access to and interoperability of national registers and that no major misunderstandings as to the trustworthiness and legal value of information contained in the different registers occur. Thus the once only principle could also be detrimental in this area.

6. Data transferability between public services should always respect the data protection laws of the different Member States and the safety of the data transferred must be guaranteed at any time. As explained above, the free transfer of data registered in national registers between countries can be dangerous as the procedures for collecting the information, the quality of the data as well as the legal value of the information can vary widely from one Member State to the other.

Q8. [On behalf of a business or private organisation] Is there any additional important actions that could result in better interoperability between your organisation and public administrations from other EU Member States?*

- Yes
 No
 Don't know/ No opinion

[If 'Yes' is ticked] Please further detail the proposed additional actions.*

5.2. Assessment of the revision of the EIF

The revised and extended EIF will be the enhanced structure to provide guidance to public administrations regarding the definition, design and implementation of public services in the European Union. The EIF will have to be updated to reflect the recent evolution of the EU legislation and digital strategies as well as the emerging technological trends.

This section deals with the collection of input in relation to the importance of the proposed revised recommendations and impacts that they may produce (costs and benefits).

Q9. [On behalf of a business or private organisation] Please select up to 10 areas in which you expect the EIF to contribute the most with regard to the implementation of interoperability in your country as well as in Europe in general. *

- Cost savings
- Time savings
- Increased revenue
- Reduced operational costs
- Vendor lock-in avoidance
- Support innovation
- Support employment
- Facilitate reuse, sharing and adoption of future solutions
- Increase transparency
- Increase growth and competitiveness
- Protection of fundamental rights
- Reduced CO₂ emissions
- Better decision making
- Advance public and private policy goals
- Higher satisfaction levels in services for the direct beneficiaries of interoperability solutions
- Improved compliance for organisations implementing, operating and maintaining interoperability solutions
- Better data quality
- Better data availability
- Improved security
- Don't know/ No opinion

Q10.[If 'A business or private organisation' is ticked] Please indicate the level of importance of the following recommendations with regard to the benefits they may generate for your business/ private organisation. *

The EIF adheres to certain interoperability principles; notably subsidiarity and proportionality, reusability, technological neutrality and adaptability, openness and transparency, user-centricity, inclusion and accessibility, security and privacy, multilingualism, administrative simplification, preservation of information, effectiveness and efficiency.

The EIF will be effective and serve its purpose to boost interoperability at European and national levels, when National Interoperability Frameworks (NIFs) are aligned with it. NIFs could be further tailored and extended to better meet the national context and needs.

The Members States should aim for openness and transparency, reuse and share solutions (including data) which are technologically neutral, easily accessible, secure, multilingual and also cater for proper preservation of exchanged information.

You can access a full description of each recommendation by clicking [here](#).

Recommendations	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Data transferability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. User involvement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Once-only submission of information	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Administrative simplification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Effectiveness and efficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[If not all recommendations rated with “Rather important” or “Very important”] Please indicate the reasons why these recommendations are not all considered as sufficiently important by your business/ private organisation.*

As far as data transferability is concerned, free transfer of data between base registers should be treated very cautiously due to major differences with respect to registration procedures, quality and legal value of the data registered in the different national registers as well as legal concepts.

For the establishment of European Public Services, public administrations should adopt service models that allow the reuse, whenever possible, of existing services and data components (building blocks, preferably loosely coupled with each other) and put in place and maintain the necessary infrastructure.

For this purpose, the EIF proposes a **Conceptual Model** the components of which, and corresponding recommendations, are presented below.

You can access a full description of each recommendation by clicking [here](#).

Recommendations	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
6. Base Registries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Open data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Service Catalogues	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Security and privacy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

[If not all recommendations rated with “Rather important” or “Very important”] Please indicate the reasons why these recommendations are not all considered as sufficiently important by your business/ private organisation.*

As explained above (questions 5 and 7), cross-border access to and free transfer of data between base registers can present risks due to major differences with respect to registration procedures, quality and legal value of the data registered in the different national registers as well as legal concepts.

The EIF proposes a **layered interoperability model** and recommends that public administrations should ensure proper “Interoperability governance” of their interoperability activities, also through alignment with the European Interoperability Framework and continuous monitoring.

Recommendations stemming from the proposed model are listed below.

You can access a full description of each recommendation by clicking [here](#).

Recommendations	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
10. Standards and specifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Open specifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Interoperability and public services governance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Legal interoperability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Organisational interoperability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Information interoperability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Technical interoperability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[If not all recommendations rated with “rather important” or “very important”] Please indicate the reasons why these recommendations are not all considered as sufficiently important by your business/ private organisation. *

As explained above, at least as far as (base) registers are concerned, legal interoperability as well as information interoperability bear high risks. Indeed, registration procedures and therefore the quality of the data registered as well as its legal value varies widely from one Member State to the other (for example, as far as the real estate register is concerned, in some Member States, anyone can register information without preventive controls, while in other Member States registrations are made only after previous verification by a Court or another public authority, which leads to a much higher quality and guarantee of accuracy of the registration. The legal value of registrations also varies significantly: for instance, in some states, good faith in the accuracy of registrations is protected (as a consequence of the extensive verification procedures previous to registration), while in other states, there is no such good faith protection). In addition, legal concepts vary widely from one Member States to another. Considering this, we would not recommend ignoring national standards and rights as to cross-border access and interoperability of national registers, as they could lead to major misunderstandings as to the trustworthiness and legal value of information contained in the different registers. Thus the once only principle could also be detrimental in this area.

Different impacts may result from the implementation of the aforementioned actions. These impacts can be positive (also referred to as "benefits" in the remainder of this questionnaire) or negative (also referred to as "costs" in the remainder of this questionnaire) and can be grouped into the following three categories:

- **Economic impacts:** changes in costs (compliance cost, increased revenue, reduced operational cost, etc.), changes in time needed to perform an activity (that could often be translated in economic impact), administrative burdens to businesses and citizens, impact on the potential for innovation, competitiveness, technological development, etc.
- **Social impacts:** impacts on fundamental/human rights, changes in employment levels or job quality, social inclusion, impacts on health, security (including crime and terrorism), education, accessibility to and quality of public services, citizens' participation in decision-making, etc.
- **Environmental impacts:** positive and negative impacts associated with the changing status of the environment such as climate change, air, water and soil pollution, etc.

Given that the implementation of the proposed recommendations concern Public Administrations, it will not imply any direct cost for businesses/ private organisation. However, benefits are expected due to new business opportunities that may arise.

Q11.[If 'A business or private organisation' is ticked] Please indicate, if any, the expected types of benefits for your business/ private organisation resulting from the implementation of the following recommendations by your country's public administrations. *

You can access a full description of each recommendation by clicking [here](#).

Recommendations	Economic	Social	Environmental	Other	None	Don't know / No opinion
1. Data transferability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. User involvement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Once-only submission of information	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Administrative simplification	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Effectiveness and efficiency	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Base Registries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Open data	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Service Catalogues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Security and privacy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Standards and specifications	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Open specifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Interoperability and public services governance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Legal interoperability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Organisational interoperability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Information interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Recommendations	Economic	Social	Environmental	Other	None	Don't know / No opinion
16. Technical interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[If 'None' is ticked] Please indicate the reason(s) why the implementation of some recommendations will not result in any benefits to your business/ private organisation. *

As explained above, due to differences in registration procedures as well as concerning the legal value and content of registration, at least as far as registers are concerned, legal interoperability bears high risks.

[If 'Other' is ticked] Please indicate in which other type(s) of benefits the implementation of these recommendations will result for your business/ private organisation. *

Administrative burdens are the costs to businesses and citizens for complying with the information obligations resulting from government imposed legislation and regulation.

Q12.[On behalf of a business or private organisation] In your opinion, to what extent do you agree that the implementation of the aforementioned recommendations will contribute to reduce administrative burden for your business/ private organisation?*

- Fully agree
- Agree
- Neither agree nor disagree
- Disagree
- Fully disagree
- Don't know / No opinion

Please feel free to comment on your answer.

Q13.[On behalf of a business or private organisation] Taking into account existing constraints (e.g. technological, human and financial resources, skills), please select up to 10 recommendations that will have the highest priority to be implemented within your country's administrations in order to better achieve interoperability during the 2017-2020 period.*

- Solutions and data reusability
- Openness and Transparency
- Technological neutrality and data transferability
- User centricity (user involvement, once only submission of information...)
- Inclusion and accessibility
- Security and privacy
- Multilingualism
- Once-only submission of information
- Administrative simplification
- Preservation of information

- Effectiveness and efficiency
- Base Registries
- Open data
- Service Catalogues
- Standards and specifications
- Interoperability governance
- Public service governance
- Legal interoperability
- Organisational interoperability
- Information interoperability
- Technical interoperability
- Don't know/ No opinion

Q14.[On behalf of a business or private organisation] As mentioned at the beginning of this consultation, please feel free to express any further comment that you may have on the draft revised EIF text.

6. Subsidiarity

The Impact Assessment also verifies whether EU action in areas beyond its exclusive competence is compatible with the principle of subsidiarity.

As defined in Article 5(3) of the Treaty on European Union, the Union should intervene only if it is able to act more effectively than EU countries at their national or local levels.

Q15.[On behalf of a business or private organisation] Do you agree that, with regard to the revision of the EIS and the EIF, action at EU level provides clear added value compared to action taken at Member State level?*

- Yes
- No
- Don't know/No Opinion

[If 'Yes' is ticked] Please explain the main differentiating benefit(s) of an EU action compared to an action taken at Member States level.*

[If 'No' is ticked] Please explain why EU action does not provide a clear added value compared to actions taken at Member States level.*