Open Public Consultation: Revision of the European Interoperability Framework (Business or private organisation)

Fields marked with * are mandatory.

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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.

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 or by post at:

European Commission
DG DIGIT
Unit B6 - Interoperability solutions for European public administrations (ISA)
B - 1049 Brussels.

1. Registration

*Surname:

Hannemann
**Name:**

Martin

**Email address:**

info@gmjw.net

**What is your nationality?**

- Austria
- Belgian
- British
- Bulgarian
- Croatian
- Cypriot
- Czech
- Danish
- Dutch
- Estonian
- Finnish
- French
- German
- Hungarian
- Icelandic
- Irish
- Italian
- Latvian
- Liechtenstein
- Lithuanian
- Luxembourger
- Maltese
- Norwegian
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Swedish
- Spanish
- Swedish
- Other

**What is the name of your business/ private organisation?**

gmjw consulting

**My business/ private organisation is in:**

- Austria
- Belgium
- Bulgaria
- Croatian
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- French
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italian
- Latvia
- Liechtenstein
- Lithuania
- Luxembourger
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenian
- Spain
- Sweden
- United Kingdom
- Other
What is your function in your business/ private organisation?

Owner

If you represent other business(es)/ private organisation(s), please specify how many.

1-3500

What is the total number of permanent employees in your business/ private organisation?

- 1 - 9
- 10 - 49
- 50 - 249
- > 250

At what level does your business/ private organisation operate?

- International
- EU
- National
- Regional
- Local

Is your organisation in the EU's Transparency Register?

- Yes
- No

Please specify its Transparency Register Number.

176405522467-72

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.
*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

*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

*Has your business/ private organisation used electronic public services provided by your country’s administrations in 2015?

- Yes
- No
- Don’t know / No opinion

*Which electronic public services has your business/ private organisation used the most frequently?

- tax authority

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” that included the European Interoperability Strategy (EIS) and European Interoperability Framework (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 Members 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. 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
Q2. 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

Please feel free to comment on your answer.
Q3. 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

Please describe the other problems faced by your business/private organisation when using digital public services nationally or cross-border.

There must be a new approach developed and introduced which turns the workload related to public interest themes – including public calls, tenders, procurement etc – to the roles of public bodies in favour of the target group. This rule should be particularly considered for smaller and smallest market participants as they have not the capacities for huge administration workload linked to bureaucracy and they need to concentrate on their core competences instead of spending hours, days and even weeks for (unpaid) product, project or program development, private sector engagement and its administration and communication.

I kindly ask for your consideration that I preserve the right to change or add further information, comments or recommendations on a consultative basis.

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. 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
Q5. 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.

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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.

4. Support activities related to security and data protection issues of public services.
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Q6. 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

Please further detail the proposed additional actions.

- Public interest bodies on a national, European and Intl level must consider the development of coherence policies, including rendered through contributions and commitments by the private sector, in particular small and smallest market actors.

- Public interest bodies on a national, European and Intl level must ensure that staff and officers of public bodies, including leadership, conduct best practice rules and must warrant, that submitted information, ideas, plans or other useful contributions will not be used for improvement of own interest. Otherwise it must be considered as service and as such must be compensated.

I particularly reserve the right to add or change any contribution as provided on a consultative basis which maybe subject to the renumeration or compensation of rendered services.
Q7. 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.

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| *5. Support activities related to security and data protection issues of public services |
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6. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens.

7. Ensure that data is transferrable between the European public services without restrictions, with respect to data protection and security rules.
*Q8. 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

*Please further detail the proposed additional actions.

as above

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. 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.

*at most 10 choice(s)*

- [ ] Cost savings
- [ ] Time savings
- [ ] Increased revenue
- [ ] Reduced operational costs
- [ ] Software 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. 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 Member 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.

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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](#).

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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](#).
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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 organisations. However, benefits are expected due to new business opportunities that may arise.

**Q11. 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](#).*
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<tr>
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<th>Economic</th>
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<td>16. Technical interoperability</td>
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<td>✔</td>
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*Please indicate in which other type(s) of benefit the implementation of some recommendations will result for your business/private organisation.*

Improvement and measurement of contributions by public-community-private partnership models for public interest themes.

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

**Q12. 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.

Appropriate further information may be submitted on a consultative basis.
Q13. 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.  

At most 10 choice(s)

- 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. 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.

Several EU DGs, including the DG responsible for the ISA program, are invited to join an innovative program initiative which contributes not only to the digital economy agenda, but to many more public interest themes in regard to Europe 2020 Agenda, specific European Union Key Strategies, and high level objectives by the Sustainable Development Agenda and further international organisations.

Thank you for your consideration.

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. 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

*Please explain the main differentiating benefit(s) of an EU action compared to an action taken at Member States level.

In particular in regard to smaller and smallest operators and market participants, contributions for public interest themes, bureaucracy burdens and administration workload must be compensated.

There is also evidence, that public interest bodies and leadership took or take advantage of contributed information or ideas or plans for their own interest or further development as public entity or individual career development whilst the work and efforts were submitted or communicated without renumeration.

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