

Open Public Consultation: Revision of the European Interoperability Framework (Public Administrations)

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 () and the European Interoperability EIS 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
D G D I G I T

Unit B6 - Interoperability solutions for European public administrations (ISA)
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1. Registration

*

Surname:

Name:

*

Email address:

*

What is your nationality?

Dutch

*

Where do you live?

Netherland

*

What is the name of your administration?

Ministry of the Interior and Kingdom Relations

At which level of government does your organisation/administration work?

National

*

Have you already replied to any targeted consultation related to the revisions of the EIS/EIF in the course of 2015 (e.g. workshops, interviews, online surveys)?

Yes

*

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

*

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

2. Publication consent

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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 is a draft version of the revised European Interoperability [here](#) 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 ISA), 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. Assess the need of revising the EIS and EIF

The questions related to this section have been addressed during the targeted consultations which took place in the course of 2015, with regards to the revision of the EIS/EIF (e.g. workshops, interviews, online surveys).

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 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 at Member States level

The following set of questions will address [interoperability at Member State level](#), i.e. across national public administration’s entities of different levels and sectors.

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Q1. To what extent is interoperability among your country's public administration's entities considered as a political priority?

- High priority
- Medium priority**
- Low, or not at all a priority
- Don't know/ No opinion

*

Q2. What are the main priorities in relation to interoperability among your country's public administration's entities?

The political objectives are realising a digital government , that provides easy and secure digital public services to citizens and businesses, with the aim of better service delivery, administrative burden reduction and increased efficiency. Interoperability is an important condition.

One of the main initiatives to achieve interoperability is the creation of the Generic Digital Infrastructure (GDI) .

GDI consists of standards , products and services that are used jointly by (all) several public administrations government and in some cases even by private parties with a public task. GDI is an indispensable part of the (digital) basic services that allow organizations to organize their primary processes. The Netherlands Government reference architecture (NORA) is part of the GDI . NORA is considered the National Interoperability Framework.

The GDI has a governance under the umbrella of the national Commissioner for Digital Government. The governance of the GDI focus on (open) standards for the electronic interchange of data between administrations and between administrations, businesses and citizens. It is thus about standards that allow data exchange across organization borders.

Q3. Are the priorities mentioned in the previous question (Q2) formalised in a specific strategy?

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

Please specify which official document you are referring to.

Vision paper digital government

Q4. Please select up to 10 major problems identified in your administration as obstructing the implementation of interoperability among your country's public administration's entities.

at most 10 choice(s)

- **There is no single legal framework in my country within the area of interoperability across sectors (legislation in the area of interoperability tends to be sectorial).**
- There is a lack of resources available for implementing interoperability in my country.
- **Interoperability is not a priority in the political agenda of my country.**
- There is a lack of a consolidated view on all the existing interoperability initiatives in my country.
- The IT budget of my country is largely affected by the maintenance of legacy systems.
- Interoperability is not perceived as a worthwhile investment in my country.
- EU funds, i.e. European Structural and Investment Funds (ESIF) that could be used to implement interoperability are not well leveraged by my country.
- The implementation of interoperability initiatives in my country is not sufficiently monitored.
- There is a shortage of skills to implement interoperability-related policies and initiatives in my country.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Technological evolution in my country is largely affected by the maintenance of legacy systems.
- Technological evolution in my country is largely affected by the maintenance of legacy systems.
- **There is a lack of standards to sufficiently ensure interoperability or standards, even if available, are not enough integrated by suppliers in their solutions.**
- There is a lack of a national public procurement strategy or guidelines, especially with regards to reference to standards and specifications
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in in my country.
- The costs and benefits of interoperability are not assessed when developing national legislation.
- Some of the Member States' policies may contain requirements that are not supported by / adapted to the market (e.g. reference to specific technologies as being the only permissible solutions).
- Other
- Don't know / No opinion

*

Q5. In relation to interoperability among public administration's entities, which of the following areas have been addressed by your administration?

- **Semantic interoperability (i.e. how the meaning and syntax of information should be addressed)**
- **Information availability and usage (i.e. where and which information is available and what can be done with this information)**
- **Trust and Privacy (i.e. how information can be accessed and exchanged in a secure and trustworthy way)**
- **Catalogue of service (i.e. consolidated list of available services)**
- **Catalogue of ICT standards and interoperability specifications to guide public procurers,**

- **Interoperability architecture** (i.e. architecture that puts together and structures all aspects of a public service from legal to organisational, information-related and technical)
- **Expertise support and methodologies** (i.e. how to create and maintain the aforementioned architecture)
- **National legislation referring to/linked with ICT** (i.e. performing a systematic and well defined ICT implications' assessment with the involvement of legal and ICT experts)
- **Interoperability awareness** (i.e. awareness and recognition of interoperability as a cornerstone for building public services)
- **Sharing best practices and supporting communities by using collaborative platform(s).**
- Other
- Don't know / No opinion

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Please further detail the initiative(s) that address "semantic interoperability" in your administration.

As part of the system of base registries a catalogue (repository of data) has been developed describing the data that are held in the different base registries , their meaning , how they are interconnected, and the legislation for which the data were collected.

National view on semantics: http://noraonline.nl/wiki/Nationaal_Semantisch_Vlak

Together with several communities that help set up this national view, for example by harmonizing definitions or explaining the differences

Please further detail the initiative(s) that address "information availability and usage" in your administration.

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As part of the system of base registries a catalogue (repository of data) has been developed describing the data that are held in the different base registries , their meaning , how they are interconnected, and the legislation for which the data were collected.

Please further detail the initiative(s) that address "trust and privacy" in your administration.

Data protection rules, Privacy impact assessments, and base lines information security

Please further detail the initiative(s) that address "catalogue of services" in your administration.

The Dutch standard for collaborating catalogues is a set of agreements about the exchange of information on products and services of government organization, like permits, grants, subsidies, taxes and charges. Individual government organizations provide information on their website about their service provided to citizens and businesses. By publishing this information in accordance with the SC standard creates a virtual catalogue or reference registry for the entire government.

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Please further detail the initiative(s) that address "catalogue of ICT standards and interoperability specifications to guide public procurers" in your administration.

The Cabinet sets open standards as the norm. Open standards contribute both to interoperability and freedom of choice for suppliers. 'Open' refers to the standardization process. This applies to low-threshold availability of documentation, no obstacles based on intellectual property rights (e.g. no patent royalties), opportunities for public participation, and independence and sustainability of the standardization organization. The Standardisation Forum manages the lists of open standards. The list comprised both recommended (common) and mandatory ('comply or explain') open standards. The target group is the (semi-) Government including the fields of education and care.

Please further detail the initiative(s) that address "interoperability architecture" in your administration.

NORA is the Dutch Government reference architecture. The philosophy behind NORA is to "Navigate to relevant Agreements". NORA contains a set of national agreements that allows governments to cooperate with each other and to implement a whole of government approach for service delivery. NORA is built around ten basic principles for digital services, which public services are supposed to meet, to increase the interoperability of their services. The ten basic principles are further concretized in derived principles that can be used when designing or modifying processes and systems in practice. NORA is considered the National Interoperability Framework.

Please further detail the initiative(s) that address "expertise support and methodologies" in your administration.

NORA community: http://noraonline.nl/wiki/Beheer_en_doorontwikkeling_NORA and especially the communities that are active in the about 20 domains / sectors http://noraonline.nl/wiki/NORA_Familie

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Please further detail the initiative(s) that address "national legislation referring to/linked with ICT" in your administration.

Currently legislation is being prepared that will arrange mandatory use of parts of the GDI.

The system of base registries, that is aimed at reuse of government data is underpinned by legislation. Each base register is arranged by law. Some examples of these laws are legislation (base register persons, new commercial register and base register buildings and addresses).

Legislation is in place for the use of unique identifying numbers (citizens service number), facilitating technically the exchange of personal data between domains. Usage of the CSN is arranged by law and under strict conditions.

4.2 Assessment of needs and problems at cross-border level

The following set of questions will address the **cross-border dimension of interoperability**, i.e. when it has to be established between public administrations of different countries or between businesses and public administrations that are not located in the same country.

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Q6. To what extent is cross-border interoperability considered as a political priority in your country?

Medium priority

Q7. What are the main priorities in relation to cross-border interoperability in your country?

Cross border interoperability is rather arranged by domain. The policy is to solve cross-border interoperability at operational service level by a continuous improvement of our services. Priorities differ by domain.

Q8. Are priorities mentioned in the previous question formalised in a specific strategy?

No

Q9. What are the main problems, if any, faced by your administration while implementing these aforementioned priorities?

*

Q10. Please select up to 10 major problems identified in your administration as obstructing the implementation of interoperability with other countries.

at most 10 choice(s)

- Our national interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF (adopted in 2010) since they were adopted before the ones at EU level.
- Our national interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF, since the latter do not always capture the needs of our public administrations.
- There is a lack of resources available for implementing cross-border interoperability in my country.
- **Cross-border interoperability is not a priority in the political agenda of my country.**
- **There is a lack of a consolidated view on all the existing cross-border interoperability initiatives in my country.**
- The IT budget of my country is largely affected by the maintenance of legacy systems.
- Cross-border interoperability is not perceived as a worthwhile investment in my country.
- European Structural and Investment Funds (ESIF) that could be used to implement cross-border interoperability are not well leveraged by my country.
- There is a shortage of skills to implement cross-border interoperability policies and initiatives in my country.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Cross-border digital public services available in my country are not (although it is needed) sufficiently multilingual.
- **There is a limited demand from our national citizens, businesses and/or administrations for digital cross-border public services (e.g. cross-border mobility is low).**
- Existing cross-border digital public services available in my country are not sufficiently known by citizens, businesses and/or public administrations (lack of awareness).
- Our national portals tend to be fragmented.
- Our national portals are not sufficiently integrated with EU portals.
- Technological evolution in my country is largely affected by the maintenance of legacy systems.
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in in my country.
- There is a lack of interoperability standards or different countries are using different standards.
- Interoperability standards, even when available, are not widely used.
- Other

- Don't know / No opinion

Q11. In your view, do you see any additional problems that may obstruct the implementation of interoperability between your administration and other countries?

The GDI is developed to serve national objectives and GDI elements are aimed at public administrations in the national domain.

Generic interoperability frameworks are often difficult to be connected with the specific business needs of the public services in the domains. The lack of connection with the business may result in limited results and support.

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Q12. In relation to cross-border interoperability, which of the following areas have been addressed by your administration?

- **Semantic interoperability (i.e. how the meaning and syntax of information should be addressed)**
- **Information availability and usage** (i.e. where and which information is available and what can be done with this information)
- Trust and Privacy (i.e. how information can be accessed and exchanged in a secure and trustworthy way)
- **Catalogue of service** (i.e. consolidated list of available services)
- **Catalogue of ICT standards** and interoperability specifications to guide public procurers
- **Interoperability architecture** (i.e. architecture that puts together and structures all aspects of a cross-border public service from legal to organisational, information-related and technical)
- Expertise support and methodologies (i.e. how to create and maintain the aforementioned architecture)
- Cross-border legislation referring to/linked with ICT (i.e. performing a systematic and well defined ICT implications' assessment with the involvement of legal and ICT experts)
- Interoperability awareness (i.e. awareness and recognition of interoperability as a cornerstone for building cross-border public services)
- Sharing best practices and supporting communities by using collaborative platform(s).
- **Other**
- Don't know / No opinion

Please further detail the initiative(s) that address "semantic interoperability" in your administration.

*

Connection has been made between the system catalogue at the national level and the work under ISA on Core vocabularies

Please further detail the initiative(s) that address "information availability and usage" in your administration.

See previous question

Please further detail the initiative(s) that address "catalogue of services" in your administration.

*

Connection has been made between the national initiative of the cooperating catalogue and the work under ISA on catalogue of services

Please further detail the initiative(s) that address "catalogue of ICT standards and interoperability specifications to guide public procurers" in your administration.

*

The use of open standards has been promoted also in the light of the revised EIF and connection has been made between the work on the Standardisation Forum on ISA work on CAMMS

Please further detail the initiative(s) that address "interoperability architecture" in your administration.

NORA is the Dutch Government reference architecture. Coordination between the national and European interoperability framework has been made.

Please explain which other area(s) have been addressed by your administration.

We support the initiative to create an interface between the national standard digikoppeling and the European edelivery standard

4.3 Assessment of needs and problems related to the EIF

Today, there is a common understanding among Member States on the basic requirements to achieve interoperability, based on the "European Interoperability Framework" launched by the Commission in 2010. According to the Digital Single Market Strategy for Europe, it is now time to update and extend this framework.

As mentioned in the Report on the State of Play of Interoperability 2014, the average alignment between EU Member States' national interoperability frameworks and the EIF stood at 74% in 2014.

However, the overall average of NIF Implementation and Monitoring for 2014 was significantly lower (28%).

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Q13. In your opinion, what are the main problems, if any, faced by your administration while implementing the EIF?

Based on the Report on the State of Play of Interoperability 2014, certain issues have been identified as impeding the implementation of the EIF at national level.

Generic interoperability frameworks are often difficult to be connected with the specific business needs of the public services in the domains.

Interoperability will not be increased when it's unclear which problem is to be solved (in relation to the costs and effort). When stimulating interoperability it's important to connect to the business. The approach should focus and prioritise use cases of cross-border services with clear user-need (citizen, businesses, public administration), where interoperability barriers appear and connect where possible with domain priorities. Examples could be found in the field of social security, procurement, international students.

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Q14. Please select up to 5 major problems identified by your administration as impeding the implementation of the EIF.

at most 5 choice(s)

- Technical aspects and rules are specified in some legislation in my country, resulting in difficulties to stay in line with technological innovations.
- Lack of central interoperability governance and coordination at national level.
- There are IT budget cuts in the public administrations of my country.
- Legislation does not take interoperability into account.
- Lack of a monitoring process for interoperability projects.
- Lack of engagement from stakeholders.
- The effort needed for NIF implementation and monitoring is too significant for my country.
- Public entities in my country generally do not have sufficient IT resources.
- Skills/competencies improvement is needed in my country for the development of interoperability solutions.
- Multilingualism (whenever needed) is a key challenge in my country.
- Legacy technology is a barrier to the implementation of the EIF in my country.
- Silo mentality is a barrier to the implementation of the EIF in my country.
- Different ways of working among IT people is a barrier to the implementation of the EIF in my country.
- Benefits from the use of common interoperability solutions are not always precisely assessed.
- Lack of public procurement strategy and guidelines on the use of standards
- **Don't know / No opinion**
- **Please feel free to comment on your answer.**
- From the perspective of subsidiarity other (domain or national) frameworks may prevail
- The Netherlands score well in the EU rankings regarding connection between the national frameworks (NORA) and EIF. Moreover the Netherlands score well in the implementation of the national framework.

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Q15. Are the principles, recommendations, conceptual models and interoperability requirements contained in the EIF considered when a new ICT project is launched in your administration?

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

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Please explain the reason(s) why these principles, recommendations, conceptual models and interoperability requirements are only partially considered when a new ICT project is launched in your administration.

From the perspective of subsidiarity other (domain or national) frameworks are applicable (e.g. Enterprise Architecture Rijksoverheid)

5. Assess the impact of the EIS/EIF revision

5.1 Assessment of the revision of the EIS

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, assess the

complexity/difficulty of their implementation and identify the type and severity of their impacts. It will also identify the priorities to be tackled by the EIS.

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Q16. Do you agree that the vision for a revised EIS should be that "By 2020, citizens and businesses should benefit from interoperable user-centric digital public services, at national and EU levels, in support to the free movement of goods, persons and services throughout the Union"?

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

Visions should be ambitious; the vision is in line with the Cabinets ambitions to allow citizens to interact with governments in a digital way. The cross border dimension puts an additional dimension. The development of cross border services should be demand driven.

Please explain the reason(s) why you do not agree with the vision and/or make your own proposal.

The EIS should be considered from both the European and national perspectives. The following set of key actions was identified through consultation with the Member States' representatives in the ISA (Interoperability Solutions for European Public Administrations) Committee and with EC officials. Those actions should be assessed to allow for their better prioritisation in the revised EIS to realise the European Union's overall and Member States' individual national interoperability objectives..

Q17. Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate in your country in spite of the potential complexity of implementing any individual one.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Define and implement a Governance structure to Enable interoperability of digital public services at national level	x					
2. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level				x		
3. Put in place optimised Organisational structures for Delivering integrated integrated (end-to-end) digital public services	x					
4. Develop tools and methods to allow public services to align their business processes, thus resulting to Interoperable end-to-end public services		x				
5. Develop and promote Monitoring mechanisms to		x				

assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses						
6. Ensure users' involvement in the design of national public services	x					
7. Ensure effective Communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness			x			
8. Promote the use of Interoperable solutions including those produced by EC programmes in particular by ISA/ISA ² (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)		x				
9. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)				x		
10. 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				x		
11. Support activities related to security and data protection issues of public services				x		
12. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens	x					
13. Support activities ensuring that the "digital" dimension is considered when preparing national legislation, the digital impact is properly assessed and proper IT solutions are in	x					

place to facilitate decision-making and the national legislative process						
14. Align with and promote the use of the European Interoperability Reference Architecture (EIRA)					x	
15. Enrich and reuse solutions contained in the European Interoperability Cartography (EICart)				x		
16. Ensure that data is Transferrable between public services without restrictions, with respect to data protection and security rules	x					

Please indicate the reason(s) why some actions are not considered as important by your administration.

Some of the above actions do not meet the principle of subsidiarity. We don't see added value of EU action of stimulating interoperability in the national domain. We have our own national and domain specific arrangements.

Q18. Are there any additional important action(s) that could better support interoperability at national level?

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

Q19. 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 country and other EU Member States in spite of the potential complexity of implementing any individual one.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Define and promote Governance structure/s for the interoperable management of digital public services at European level			x			
2. Identify, liaise and share Governance practices with relevant policies and their governance structures at EU or national level				x		
3. Ensure that interoperability				x		

requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level						
4. Put in place optimised Organisational structures for Delivering integrated (end-to-end) digital public services		x				
5. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable European public services		x				
6. Develop and promote Monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses		x				
7. Ensure users' involvement in the design of European public services				x		
8. Prepare a communication strategy and have it implemented						x
9. Ensure effective Communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness				x		
10. Promote the use of Interoperable solutions including those produced by EC programmes in particular by ISA/ISA ² (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)					x	
11. Support activities related to the development and operation of Trans European Systems supporting EU policies, including their underlying network infrastructure				x		

12. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)				x		
13. Support activities related to the description, organisation and availability of catalogues of European and national public services				x		
14. 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.				x		
15. Support activities related to security and data protection issues of public services				x		
16. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens	x					
17. Support activities ensuring that the "digital" dimension is considered when preparing EU legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision and law making					x	
18. Define, maintain and promote the European Interoperability Reference Architecture (EIRA)					x	

19. Put in place and operate the European Interoperability Cartography (EICart) and feed it with reusable and interoperable solutions from the EC, the Member States' administrations and other sources				x		
20. Ensure that data is Transferrable between the European public services without restrictions, with respect to data protection and security rules	x					

Please indicate the reason(s) why some actions are not considered as important by your administration.

These actions seem to meet the real needs of the business (public administrations with cross border services) to a lesser extent

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Q20. Are there any additional important action(s) that could better support interoperability at European level as part of the EIS?

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

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, the complexity of their implementation and impacts that they may produce (costs and benefits).

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Q21. 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

Q22. Please indicate the level of importance of the following recommendations with regard to the benefits they may generate in your country in spite of the potential complexity of implementing any individual one.

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](#).

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
1. Data transferability				x		
2. User involvement					x	
3. Once-only submission of information					x	
4. Administrative simplification				x		

5. Effectiveness and efficiency				X		
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Please indicate the reason(s) why some recommendations are not considered as important by your administration.

In general we support the recommendations in the revised EIF document. They touch on the right issues and are in general terms in line with the general principles and recommendations in NORA, which we consider as our national interoperability framework.

We welcome the principle of subsidiarity in the proposal for the revised EIF. Subsidiarity means that the EU does not take action unless this is more effective than action taken at national level. This supposes that when domain specific and national frameworks are in place these should prevail. The recommendation that national frameworks should be aligned with the European Framework however supposes that the European framework prevails. That makes us reluctant to indicate strongly that EIF recommendations bring benefits at national level.

Regarding data transferability: we prefer to speak of reuse of data.

We are of the opinion that open specifications should be 'more than preferred'. The more closed a specification is, the more friction there is with "not impose any specific technological solution"(Recommendation 4) and "data is easily transferable between systems"(R5)

We feel that the principle 12 in the current EIF meets better our concerns as it includes 'user-need', proportionality and balance between costs and benefits (thus focus).

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.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
6. Base Registries				x		
7. Open data					x	
8. Service Catalogues				x		
9. Security and					x	

privacy						
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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.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
10. Standards and specifications					x	
11. Open specifications					x	
12. Interoperability and public services governance				x		
13. Legal interoperability				x		
14. Organisational interoperability				x		
15. Information interoperability				x		
16. Technical interoperability				x		

Please indicate the reason(s) why some recommendations are not considered as important by your administration.

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.

Q23. Please indicate, if any, the expected types of benefits resulting from the implementation of the following recommendations.

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

	Economic Business/ citizens	Economic (Public administrations	social	environm	Other	None	Don't know
1. Data transferability	x	x					
2. User involvement			x				
3. Once-only submission of information	x	x					
4. Administrative simplification		x					
5. Effectiveness and efficiency 6. Base Registries		x					
7. Open data	x		x				
8. Service Catalogues			x				
9. Security and privacy			x				
10. Standards and specifications		x					
11. Open specifications		x					
12. Interoperability and public services governance							x
13. Legal interoperability							x
14. Organisational interoperability							x
15. Information							x

interoperability							
16. Technical interoperability							x

*

Please indicate the reason(s) why the implementation of some recommendations will not result in any benefits.

Our experiences with national practice have learned us that interoperability will not be increased when it's unclear which problem is to be solved (in relation to the costs and effort).
The question addressed in this consultation is too general to answer .
In principle interoperability is a condition for cooperation and data exchange for any kind of benefit.

Q24. Please indicate the level of complexity to implement the following recommendations within your administration.

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

	Very easy	Easy	Neither easy nor complex	Complex	Very complex	Don't know / No opinion
1. Data transferability						x
2. User involvement						x
3. Once-only submission of information						x
4. Administrative simplification						x
5. Effectiveness and efficiency						x
6. Base Registries						x
7. Open data						x
8. Service Catalogues						x
9. Security and privacy						x
10. Standards and specifications						x

11. Open specifications						x
12. Interoperability and public services governance						x
13. Legal interoperability						x
14. Organisational interoperability						x
15. Information interoperability						x
16. Technical interoperability						x

Please indicate the reason(s) that make(s) some recommendations complex to implement.

The question addressed in this consultation is too general to answer .

Q25. Please indicate, if any, the foreseen types of costs to implement the following recommendations within your administration.

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

	Economic	Social	Environmental	Other	None	Don't know / No opinion
1. Data transferability						x
2. User involvement						x
3. Once-only submission of information						x
4. Administrative simplification						x
5. Effectiveness and efficiency						x
6. Base Registries						x

7. Open data						x
8. Service Catalogues						x
9. Security and privacy						x
10. Standards and specifications						x
11. Open specifications						x
12. Interoperability and public services governance						x
13. Legal interoperability						x
14. Organisational interoperability						x
15. Information interoperability						x
16. Technical interoperability						x

*

Please indicate which other type(s) of cost the implementation of some recommendations will incur.

*

Q26. In your opinion, how would you rate the overall cost of implementing the proposed recommendations within your administration?

Please rate each recommendation from 1 to 5 (1 being the least costly and 5 the most costly).

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

	1 (least Costly)	2	3	4	5 (most costly)	Don't know / No opinion
1. Data transferability						x
2. User involvement						x

3. Once-only submission of information						X
4. Administrative simplification						X
5. Effectiveness and efficiency						X
6. Base Registries						X
7. Open data						X
8. Service Catalogues						X
9. Security and privacy						X
10. Standards and specifications						X
11. Open specifications						X
12. Interoperability and public services governance						X
13. Legal interoperability						X
14. Organisational interoperability						X
15. Information interoperability						X
16. Technical interoperability						X

Please feel free to comment on your answer.

The question addressed in this consultation is too general to answer .

*

Q27. In your view, are there any technological constraints that may hinder the implementation of the aforementioned recommendations within your administration?

- Yes

- No
- Don't know / No opinion

Q28. What is the current level of implementation of each of the following recommendations as well as your future plans in relation to their implementation within your administration?

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

	Already implemented	Partially implemented	Will be implemented	Will not be implemented	Don't know / No opinion
1. Data transferability		x			
2. User involvement	x				
3. Once-only submission of information	x				
4. Administrative simplification	x				
5. Effectiveness and efficiency	x				
6. Base Registries	x				
7. Open data	x				
8. Service Catalogues	x				
9. Security and privacy	x				
10. Standards and specifications	x				
11. Open specifications	x				
12. Interoperability and public services governance	x				
13. Legal interoperability		x			

14. Organisational interoperability		x			
15. Information interoperability	x				
16. Technical interoperability	x				

*

Please specify to which technological constraints you are referring.

*

Please select the reasons why some recommendations will not be implemented.

- Lack of financial resources
- Lack of sufficient number of human resources
- Lack of skilled human resources
- Other
- Don't know / No opinion**

*

Please indicate the missing skills that would be needed by your administration to implement the aforementioned recommendations.

*

Please indicate the other reason(s) you are referring to.

*

Q29. In your opinion, would you say that citizens will also benefit from the EIF revision?

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

*

Please explain why citizens will not benefit from the EIF revision.

The question is too general, the EIF is supportive to better cross border services for citizens and businesses. But there is little case evidence how EIF has helped the citizens to better services.

*

Q30. In your opinion, would you say that businesses will also benefit from the EIF revision?

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

*

Please explain why businesses will not benefit from the EIF revision.

The question is too general, the EIF is supportive to better cross border services for citizens and businesses. But there is little case evidence how EIF has helped the business to better services.

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

*

Q31. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for citizens?

Fully agree

Agree

Neither agree nor disagree

Disagree

Fully disagree

Don't know / No opinion

Please feel free to comment on your answer.

The question is too general, the EIF is supportive to burden reduction, but there is no clear argumentation how EIF helps realising burden reduction..

Q32. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for businesses?

Fully agree

Agree

Neither agree nor disagree

Disagree

Fully disagree

Don't know / No opinion

Please feel free to comment on your answer.

The question is too general, the EIF is supportive to burden reduction, but there is no clear argumentation how EIF helps realising burden reduction.

Q33. 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 administration 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

Q34. 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 , the Union should intervene Article 5(3) of the Treaty on European Union only if it is able to act more effectively than EU countries at their national or local levels.

*

Q35. 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.

Citizens and business should be able to get easy and secure digital public services, also when they need to manage their affairs with governments in another EU country. Common principles are important in that respect. The EIF is useful in describing and further operationalising these principles

EU action provides particular added value, where it comes to interoperability issues beyond the national domain. EU action should be aimed at making connections (interoperability on the interfaces) between the national systems (federated approach).

Please explain why EU action does not provide clear added value compared to actions taken at Member States level.

Functioning of public administrations is a matter of national competence. Prioritization and implementation of the recommendations should be considered with due respect to the existing competences.

Talking about subsidiarity, it is stated that the EU does not take action unless this is more effective than action taken at national level. This supposes that when domain specific and national frameworks are in place these should prevail.

The current draft version of the revised EIF contains the definition, that the EIF is applicable to all services provided by all government organizations. This definition can be considered is at odds with subsidiarity and proportionality. More focus and prioritization is needed on cross border services, that meet the demands of citizens, businesses and administrations.