



Position Paper

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POSITION PAPER ON THE SINGLE DIGITAL GATEWAY: REACTION OF EUROCHAMBRES TO THE EUROPEAN COMMISSION'S CONSULTATION

EUROCHAMBRES welcomes the European Commission's initiative on the introduction of a Single Digital Gateway. This short position paper should be considered as EUROCHAMBRES' contribution to the Commission's consultation on the subject.

On the objective of the initiative: better serve information needs

EUROCHAMBRES is fully supportive of creating a connected Digital Single Market, and is in particular supportive of pillar three of the Digital Single Market Strategy published in May 2015: *Maximising the growth potential of our European Digital Economy*.

Although there are already services to provide information and to provide assistance to businesses, EUROCHAMBRES acknowledges the need for a more centralized approach which would allow companies to better make use of the opportunities of the Single Market thanks to the creation of a navigation tool.

Companies that want to trade cross-borders could very much benefit from in the improvement of the quantity and quality of relevant online information on rules and requirements and a full online transactionality of the main cross-border procedures. During the European Parliament of Enterprises of 2016, 88% of enterprises answered positively to the question "*is a lack of information on rules and requirements a significant obstacle to trading in other EU member states?*"

This demonstrates that there is still a long way to go in terms of assisting companies in their plans to expand throughout the EU. Small businesses don't have the resources to deal with the current patchwork of rules. In the absence of a fully-fledged single market, companies should at least have access to accurate and succinct information about local rules.¹

¹ For all results of the European Parliament of Enterprises, go to:
<http://www.eurochambres.eu/Content/Default.asp?PageID=1&DocID=7522>

The specifics of the tool

- **Findability of information**

Companies and citizens have sometimes issues with finding relevant information on regulations that are applicable in other member states. One of the main identified reasons for this is that the information is scattered out on different national and EU portals, which in many instances are not connected to each other.

We are very much in favour of national administrations centralising the to-go points of contacts for rules on services and goods. It would be appreciated if the national administrations could centralize all the existing portals in one portal. In particular, it would make sense to integrate the content which is currently available on PSCs, PCP, PCPCs and SOLVIT on one national portal. Centralisation of information of course does not mean that the information should only be available on one single portal.

- **Quality of information**

The Single Digital Gateway initiative cannot be successful without a significant improvement of quality of the available information. This means that the information needs to meet measurable quality criteria regarding accuracy, relevance and timeliness, and plain language. These criteria should be defined through hard and soft law.

The content of the EU-level portal/centralized EU level-database should consist of basic information that is the same for all member states (e.g. general introduction text on topics, EU wide product rules). For country specific information (e.g. national rules), deep links from the EU-level portal to the right information on national sites and contact points should be provided. This set-up and division of tasks between EU and national level is to avoid updating problems while at the same time ensuring that the information can be easily found.

Member states, in our view, should be required to fulfil certain criteria as regarding the minimum amount of information they provide as well as ensure proper follow-up with companies that might have more sector-specific queries. It is crucial for companies that they receive the latest information on all latest legislation. It could even be envisaged that if legislation is in the making, that a warning is disclosed. From a practical point of view, it also important that businesses know when (ie date and time) they can have access to more personal assistance.

It is crucial for the success of the tool that the questions which business have are answered. These are usually very concrete and relate to VAT, to the need to have a license to operate, to technical rules which are specific to the host member state, formalities to fulfil regarding employing staff and many others. When designing the portal, it should be kept in mind how an entrepreneur thinks. This means that the setup of the information should be very intuitive.

Regarding language, the information should be available in at least one other official language of which we might reasonably assume that it is spoken by a majority of entrepreneurs. In other words, it should be envisaged to make English mandatory, while leaving the choice to have another language to the discretion of the member states themselves.

- **E-procedures**

EUROCHAMBRES is fully in favour of the introduction of full transactionality for the most important e-procedures. While this objective is important, it must be ensured that certain SMEs still get support through other means to have answers to their questions on procedures. Other procedures should ideally also fulfill the same requirements about transactionality, but the rollout of those should be only progressive and

voluntary. Of course, procedures should be available preferably in English in addition to the national language of the respective member state.

The Chambers also note that an important obstacle with regards to e-procedures is that the documents are only available in the national language. Most problematic in this area are the explanations of the procedures and help desk services. Therefore the usage of English should become evident for the most important procedures.

All procedures related to VAT, other taxes and social security have been identified as a priority to be put fully online. Other business procedures that have also been identified as priorities are: registration of a business from abroad, the recognition of qualifications in another EU country and applications for public procurement in another EU country. Further, fiscal registration and submission of tax forms should be considered as well.

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All our position papers can be downloaded from www.eurochambres.eu/content/default.asp?PageID=145

EUROCHAMBRES – The Association of European Chambers of Commerce and Industry represents over 20 million enterprises in Europe – 98% of which are SMEs – through members in 43 countries and a European network of 1700 regional and local Chambers.

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