



NOTE

December 2016

Danish response to the open consultation on the Single Digital Gateway

General remarks

The Danish government supports the ambition to make it easier for businesses and citizens to access information on the single market and make use of the contact points available for assistance and problem solving. The Danish government welcomes the intention to streamline and improve existing efforts by establishing the Single Digital Gateway (SDG).

Architecture of the Single Digital Gateway

The Danish government supports the concept of the SDG as a single entry point at European level. In order to ensure a consistent approach to architecture, navigation and concepts for content at all levels, it is important that the Commission takes the primary ownership of the portal. This also applies to technical issues and digital solutions which should be developed by the Commission and take into account considerations of interoperability at Member State level. The Commission is invited to carefully consider to which extent principles like once only and reuse of data may be integrated in functionalities of the SDG.

At the overall European level, the SDG should provide an independent layer of information, e.g. an overview of areas with common EU rules. At Member State level, the Commission should ensure a similar structure, user interface and ways to present content for all countries. This is crucial to ensure a certain quality consistency and comparability across Member States. The Commission should develop structures and concepts in close cooperation with Member States and by involving businesses and citizens. In this respect, it is important to map existing channels and information to avoid overlap and duplication of information leading to confusion for users and to heavy demands for maintenance.

Content according to the reality of users

It is important to obtain clarity regarding which areas of information that should be available to users. Today, existing information services and contact points (e.g. the product contact point, the point of single contact and Solvit) each have a defined scope. However, from a user's perspec-

tive, there appears to be a need for the SDG to cover a broader range of areas. The reality of businesses and citizens is often defined by complex situations with a need for information related to more contact points or to areas not covered by the current contact points. For businesses operating cross border in the service area, aspects like e.g. VAT, social security and working environment are of much interest. In Denmark, this has been tackled through an expansion of the point of single contact that today provides this type of information going beyond the obligations of the Services Directive.

A focus on concrete user behavior and “user journeys” has been crucial for the development of the current Danish point of single contact. The commission is invited to take a similar approach for the SDG. This could lead to information based on the logic of “life events” or typical situations which businesses often find useful, e.g. by using the methodological approach from the European eGovernment benchmark reports. Once online available, traffic and digital behavior should be systematically monitored in order to base future adjustments on actual demand.

The landscape of single market opportunities is continuously subject to change and it is important that the SDG takes this into account to ensure its relevance and ensure added value for businesses with innovation potential. In this respect, the Danish government encourages the Commission to look into ways to cover regulation areas of growing importance, e.g. e-commerce and collaborative economy. To the extent that a full overview over these types of rules cannot be established at Member State level, the Commission should collect current available data and present this to users at the overall European level of the SDG.

Strong governance framework

Based on the experiences with existing instruments, it is desirable that the proposal on the SDG includes a strong governance framework, setting out clear obligations and modes of cooperation for both the Commission and Member States. If introducing a governance framework for the SDG, it is crucial to clarify its status and relation to existing governance provisions laid down in e.g. the Services Directive, the PSC Charter, the Regulation for Mutual Recognition and the Solvit recommendations. Another issue to be addressed is the resource situation of Member States. It seems necessary that the Commission allocates resources to Member States to ensure that substantial improvements can be achieved through the SDG, both in terms of information, assistance and network activities.

Obligations for the Commission

The Commission’s main ownership of the gateway, its structure and overall functioning should be laid down in the governance framework. Fur-

thermore, the Commission should be given a facilitating, supporting and monitoring role. Building on existing single market networks and expert groups, the Commission should facilitate that such formations share best practice and work towards common operational goals. Finally, the Commission should monitor and evaluate performance and activities of the SDG and ensure that problems and development encountered in practice are taken up at a policy level.

Obligations for Member states

For Member States there should be a number of obligations related to the quality of information, assistance and cooperation. All information should be subject to regular updates and, as a minimum, be available in English. Quality criteria for good case handling practice should be defined, e.g. deadlines for answering queries, means of communication and practices of signposting. In terms of cooperation, a governance framework should define Member States' contribution to cross border network and reporting activities. While setting out clear obligations, it is very important that a governance framework maintains the flexibility of Member States in terms of organisation across government administrations.