Single Digital Gateway: how EU could meet expectations of citizens and businesses?

KEY FINDINGS

- A key pillar of the European Commission’s Digital Single Market Strategy is better access for consumers and business to digital goods and services across Europe. Barriers to access, missing or incorrect information online lead to substantial costs for citizens and business. In 2017 total costs incurred by businesses in finding information for cross-border activities ranges between €5.8 billion and €57.2 billion per year.

- The 2013 study on a European Single Point of Contact prepared for the European Parliament’s Internal Market and Consumer Protection Committee (IMCO). This extensive study, presented to IMCO in 2013, recommended the creation of a European Single Digital Gateway.

- The European Parliament has called repeatedly for the development of a comprehensive and fully accessible Single Digital Gateway, building upon already existing initiatives and networks, as a single end-to-end digital process for citizens, consumers and businesses.¹

- A comprehensive SDG based on user needs is a key step in the promotion of e-government.

- Four years after the recommendations for an SDG were made and presented at the IMCO meeting also attended by the Commission, the proposed regulation for a Single Digital Gateway (SDG) was published. The ‘cost of slow Europe’ due to the length of time between the identification of the need for policy action and regulatory measure impacts, including lengthy legislative processes, are estimated to be €748 billion in the area of e-commerce alone.²

- The 2013 study on a European Single Point of Contact study mapped forty four different European level online contact points for citizens, business and consumers. At national level online contact points, ranged between 61 and 22 different sites.

- The large number of European level online services and the extensive range and differing organisational arrangements of national level online services generates complexity in identification and access to relevant services. Such complexity leads to low levels of awareness, with 91.6% of consumers and businesses not knowing of any online services at European level they could turn to in case of problems.

- No update to the 2013 study was conducted as part of the Commission’s Impact Assessment. While an extensive survey of Commission website users was conducted. User satisfaction will be higher than a representative sample of
the population. This appears to have been a missed opportunity to assess the current state of play.

- The SDG brings together a range of existing and forthcoming online services. However, interlinkages between individual EU level services is missing. Users must first find Your Europe in order to be directed to the most appropriate service. EU level services remain structured on a service based approach. There is no indication of streamlining services based on user needs. Findability and accessibility will rely on the strength/accuracy of the search engine available on Your Europe.

- **Interlinking to Member States** The proposed regulation when evaluated against the recommendations of the 2013 Single Point of Contact study, meets some of these recommendations while appearing to fall short on others.

- **Services is through Your Europe.** National websites will contain a link to Your Europe, and a common search facility on Your Europe will guide users to member state pages. While this seems an improvement in interlinking and routing to national level, it remains one directional from Your Europe to individual member state competent authority web portals.

- The SDG could provide the opportunity to establish a European search engine, enabling citizens, consumer and business to find and access information and services. However, this search engine would need to be carefully considered in terms of accuracy and strength of search results.

- **The Single Digital Gateway will utilise key solutions** (e.g. a common search facility and common feedback form), and national level sites will be required to provide information in at least one other commonly used language. This will assist in overcoming language barriers and improve accessibility. The Single Digital Gateway co-ordination group will overcome the previous silo based approach.

- The decision as to how to provide information at level will be left up to member states. This will not improve findability and accessibility for users.

- Possible solutions to better meet the recommendations made by the 2013 Single Point of Contact study, as discussed at the IMCO meeting during the presentaton of the study:

  - In order for Your Europe to improve access to information for consumers, citizens and business it needs to be comprehensive in the services it covers. There are existing services that do not appear to be captured in the current proposal.
  - **Services should be grouped where feasible on a user not a supplier basis.** Links between individual complimentary services from a user perspective should be provided. This will improve findability.
  - **Services should be streamlined** where there is an overlap based on supplier focus not a user approach.
  - **Multi-directional search functions and enquiry forms from other European level portals to Your Europe;** and, if feasible between national level portals and Your Europe. This will help users stream to the most appropriate service as many users turn to national level information sources first.
• Movement towards common presentation and organisation of information between Your Europe and national portals. If harmonisation is not feasible. Best practice guidelines could be developed by the Single Digital Gateway co-ordination group with input from stakeholders to improve user findability and access when searching for information, advice and procedures on national portals.
• Consider and assess how best to promote the SDG, including planning and promotion. This could be institutional approaches such as working groups or other bodies to promote the SDG. The SDG co-ordination groups could potentially be used for this purpose.
• At a procedural level, regular surveys to assess the level of awareness across EU citizens and business. This extends beyond surveys of users.

1. Introduction

In 2013, London Economics completed a research study for the European Parliament Committee on Internal Market and Consumer Protection (the IMCO Committee) to provide background information and advice to Members on priority measures and actions to be taken in the field of “A European Single Point of Contact”.3

The extensive study undertook the following actions:

• Mapping of EU level contact points for citizens and business, and national contact points in ten Member States to assess the state of play.4
• Survey of citizens and businesses in five Member States5 to determine the level of awareness and knowledge amongst EU citizens and businesses of existing EU online portals.
• Stakeholder consultation at the EU level and within the ten Member States to assess possible solutions for improvement to information and execution of rights for citizens, consumers and business via online services and to explore stakeholder views on the value of a common online contact point

The study presented at IMCO in 2013, which was also attended by the European Commission, recommended the creation of a European Single Digital Gateway. This briefing by Dr Charlotte Duke of London Economics, for Policy Department A on request of the IMCO Committee, evaluates and presents a critical assessment of the EC proposal (in terms of institutional arrangements, proposed processes and solution) and its accompanying documents (impact assessment and staff working document). The evaluation is made in reference to the findings and recommendations made in the 2013 “A European Single Point of Contact” study.

2. Benefits to business, consumers and citizens

The European Commission’s Digital Single Market Strategy focuses on three distinct pillars of the Digital Single Market.6 One of these pillars is better access for consumers and businesses to digital goods and services across Europe. Helping to ensure a single digital market by removing barriers that hold back cross-border e-commerce. Improved access to information and processes for citizens and businesses on-line is key to the Digital Single Market and e-government.

Barriers to access, missing or incorrect information online lead to substantial costs for citizens and business.

The benefits to consumers of improved ability to compare services online was estimated to be €300 million in 2012.7 While time lost by EU citizens from not being able to access public services online range between €150 million and €600 million.8
In 2017 total costs incurred by businesses in finding information for cross-border activities ranges between €5.8 billion and €57.2 billion per year.\textsuperscript{9}

The benefits to businesses and citizens of ‘once only’ registration of data for is around €5 billion per year,\textsuperscript{10} while the benefits of a ‘whole of government’ approach to services is (also) around €5 billion per year\textsuperscript{11}.

A comprehensive SDG based on user needs is a key step in the promotion of e-government. The SDG should reduce the burden faced by citizens and consumers by improving the efficiency and transparency of interactions with public administrations.

Four years after the recommendation for the establishment of a SDG in the Single Digital Market study for IMCO, the European Commission published its proposal for a regulation on establishing a Single Digital Gateway.\textsuperscript{12}

The ‘cost of slow Europe’ which is the cumulative ‘cost of non-Europe’ accrued between the identification of the need for policy action and regulatory measures having an impact, including the lengthy legislative process and common delays in transpositions and implementation of Directives adds up. The cost of slow Europe in the area of e-commerce have been estimated at €748 billion.\textsuperscript{13}

3. Fragmentation of services

The 2013 study on a European Single Point of Contact mapped forty four different European level online contact points for citizens, business and consumers. The online service framework was comprehensive covering a wide range of issues, however it was also found to be fragmented in places with overlaps between service function in others. It is was a complicated task to track down services as the route to different services can vary, they can be known by different names (or ‘nick names’) and there is a large number of them. This was emphasised by limited awareness of the 44 services identified amongst consumers and businesses surveyed as part of the study (see section 4 below), and no stakeholder consulted as part of the study knew all of the online services that targeted their representative group.

There was also found to be an extensive number of national level online contact points, varying between 61 in Bulgaria and 22 in the Netherlands. National services also differed in their organisation. In the UK, Hungary and Bulgaria, for example, government e-services were found to be well developed with a central government portal providing entry to many single points of contact and facilitating electronic administrative procedures. Other countries such as Italy, France and Germany were found to have a more disaggregated organisation with online services provided at the regional level. National business or industry associations and consumer associations often operate online services targeted at specific industry guilds and consumer rights.

The large number of European level online services and the extensive range and differing organisational arrangements of national level online services was found to generate complexity in identification and access to relevant services.

4. Lack of awareness

Awareness of European level online contact points was found to be very low in 2013.\textsuperscript{14} In an unprompted survey question, each of the European level single points of contact were identified by less than 1% of consumers, apart from Europa EU (1.2%). While 91.6% (459 out of 501 respondents) said they did not know which online services they would turn to for advice or assistance (Figure 1).
Figure 1: **SPONTANEOUS:** Which online services at the European level can you think of which you might turn to for advice or assistance? Please name as many as you can think of (Citizens)

Note: 501 survey respondents

91.6% of business (230 out of 250) stated they did not know any European level online services. The only single points of contact which were identified by businesses as online services at the European level that they might turn to for advice or assistance were Europa EU (2%), Europe Direct (0.4%) and the European Public Sector Information Platform (0.4%).

Figure 2: **SPONTANEOUS:** Which online services at the European level can you think of which you might turn to for advice or assistance? Please name as many as you can think of (Businesses)

Note: 251 survey respondents
The situation in 2017 does not appear to have improved. Current online information provided by Points of Single Contact, Chambers of Commerce/Industry/Economy and Investment and Trade agencies were found, in many Member States, to be inadequate in terms of details or missing information and gaps. This missing information generates costs for businesses engaged in cross-border operations. In 2017 a survey of cross-border orientated businesses found that 25% of these firms could not find guidelines they required on cross-border operations when searching online.\(^\text{15}\)

No information for this briefing was found on consumer, citizen and business awareness of current EU level online portals, nor on the current state of play of existing portals at EU and national level. Given four years has passed since the Single Point of Contact study for IMCO it would have been useful to see what the situation is like to day and has anything changed since 2013.

Visits to Your Europe were on average 1.4 million per month in 2016, with 90% of visitors reporting they were ‘satisfied’ or ‘very satisfied’. Total visits were 17.2m, 40% more than in the previous period.\(^\text{16}\) While this data shows an increase in visitors (it is not clear from the data if these are unique visits) it does not directly assess the specific issue of low awareness across citizens and businesses in the EU, and whether awareness has increased since 2013.

Overall it appears that information remains fragmented, missing or inaccurate, awareness remains low and processes are often not available (or more difficult) to foreign users.

5. Study on a Single Point of Contact (2013) Recommendations

The study concluded that the framework of online services was disjointed. Online services that operate in similar areas were not linked-up with limited sign-posting between complementary services. Levels of awareness were found to be very low. Understanding of the functions, scope and target audience of the different European level online contact points, was limited and contributed to the difficulty for users to identify and access the most appropriate services.

In light of these conclusions the study made the following recommendations to improve the online service framework for European citizens, consumers and businesses.

- A single entry point based on user needs, not supplier side models that streams users to the relevant group of online services.
- Improved sign-posting between existing complimentary services at EU level, streamlining and grouping of services that have complimentary remits and improved links to national level services.
- Utilise key solutions such as frequently asked questions, online enquiry forms, language translation and search engine optimisation.
- Improve cooperation between European level service and national competent authorities. Cooperation between complimentary EU and national online services should also be improved as well as promotion of awareness at ground roots level. Hosting of European level online service logo and link on national level organisation websites, and the inclusion within national level organisation search engines was identified as one possible option.
- The use of online tools such as electronic forms to help to direct questions to the most appropriate service and available in all EU official languages.
- More generalised internal monitoring processes by individual services to provide improved information on performance of services against key service objectives.
- Reduce language gaps (77% of European level online services were not available in all official EU languages). Options such as the use of automated translation tools such as Statistical Machine Translation technology should be considered.
- The common online platform should provide information about national issues and access to relevant national organisations.
6. Proposed regulation on a Single Digital Gateway

The main aim of the Single Digital Gateway is to reduce as much as possible the additional administrative burden that EU citizens and businesses face when they expand their activities in other Member States. It seeks to improve the availability, quality and accessibility of information online.\(^{17}\) The main features of the proposal are:

It has been **four years since the publication and presentation of the Study on the Single Point of Contact for IMCO**. In 2013 this study was presented at an IMCO meeting attended by the European Commission. This delay in action from identification of a need for policy action to the publication of the proposed regulation will have lead costs from ‘slow Europe’. As previously pointed out the costs of ‘slow-Europe’ in the area of e-commerce has been estimated to be €748 billion.\(^{18}\)

Table 1 presents the assessment of the proposed regulation in regard to the deficiencies identified and recommendations made in the 2013 A European Single Point of Contact Study.

**Table 2 : Assessment of Option 2 in regard to the deficiencies identified and recommendations made in the 2013 A European Single Point of Contact Study**

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<th>2013 Recommendation</th>
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<td><strong>Umbrella, single entry point</strong>, that guides and streams users to the most appropriate service based on user needs, not supplier side models.</td>
<td>Gateway will be Your Europe maintaining the existing structure</td>
<td>The European Commission Impact Assessment (IA) states that the evidence to support the use of Your Europe is backed up by robust citizen, consumer and business research.(^{19}) The IA references findings from a 2016-17 study of firms who currently do business cross border or are considering doing business cross-border. This study surveyed 94 businesses and 23 business organisations.(^{20}) For citizens, research was conducted as part of the EC DG Strategy and Corporate Communications Transforming our Online Communications (2014).(^{21}) This included a poll of Commission website users (107,000). The poll identified the six most important areas for users: EU Law, rules, treaties and judgements; Research and innovation, funding, grants and subsidies; education and training in the EU, EU strategy, political priorities; Environmental protection, and found that satisfaction with EC online services was amongst users 60%. Ideally a survey of a representative population of EU citizens and businesses would have been a more robust approach to assessing user needs which included questions on previous use and awareness. <strong>Commission response at the 13th Meeting of IMCO DSM WG:</strong> All information already on the Your Europe portal is structured by citizens and Your Europe is structured by user themes for citizens and business. This makes it a good starting point for a Single Digital Gateway. Your Europe was found in 2013 to be limited in its effectiveness due to insufficient coverage. When specifically asked, only 7% of consumers and 9% of business said they had heard of Your Europe. Sufficient coverage will need to be ensured, and awareness raised of Your Europe amongst potential users. <strong>Assessment:</strong> Partially met the recommendation. Main reason is that a more comprehensive assessment of the current state of play would have helped to better assess the needs of consumers and businesses.</td>
<td>Your Europe is structured by user themes for citizens and business. This makes it a good starting point for a Single Digital Gateway. Your Europe was found in 2013 to be limited in its effectiveness due to insufficient coverage. When specifically asked, only 7% of consumers and 9% of business said they had heard of Your Europe. Sufficient coverage will need to be ensured, and awareness raised of Your Europe amongst potential users. <strong>Assessment:</strong> Partially met the recommendation. Main reason is that a more comprehensive assessment of the current state of play would have helped to better assess the needs of consumers and businesses.</td>
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### More effective sign-posting between existing complimentary online services, streamlining and grouping services that have complimentary remits and improved links to national level online services.

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<td>business, and guides users to national level information.</td>
<td>Annex 10 of the Impact Assessment sets out the SDG links with other initiatives. This appears to be structured in terms of a service approach not user approach. It also appears to be incomplete in some instances. For example in the area of studying and learning opportunities – EURES (living and working in the EU) is included but POLETUS (EC information portal on earning opportunities and qualification in Europe), Eurydice (information on education systems and policies) and Study Europe (information on university study) are missing. The option does not provide interlinkages between families of services. There is no indication of streamlining services based on user needs. <strong>Commission response at the 13th Meeting of IMCO DSM WG:</strong> Once the Regulation is adopted the Single Digital Gateway co-ordination group will look at rationalisation. To do this they will look at user statistics of different services and user feedback. In addition, many assistance services are established through binding acts and therefore cannot simply be removed. Improved quality of the Your Europe Portal will mean users will be better able to find the portal from standard web searches (e.g. Google). If the search facility “is right” on Your Europe then users will be able to find the services they need.</td>
<td>It is recognised that many services are established by Directives. This means that services cannot simply be removed. However, there appears to be no interlinkages between individual services. This means a user must first find Your Europe in order to be streamed to the most appropriate service. Whether improvements in the quality of Your Europe will improve its ranking in standard search engines is not known at this time. The services remain structured on a service based approach. This option relies on the strength/accuracy of the search engine available on Your Europe. <strong>Assessment:</strong> Not met the recommendation. The main reason is the continued service focus, no interlinking between individual services and missing services.</td>
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### Service interlinking and routing

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<td>Links from Your Europe to other EU initiatives</td>
<td>EU and national websites to contain links to Your Europe. Common search facility on Your Europe to guide users to member state pages. Common EU level enquiry form for assistance from Your Europe. The 2013 Single Point of Contact study found that when searching to solve a problem (e.g. with a product bought cross-border) or rights (travel, work, study) the most common place citizens go for advice is national institutions. Further, awareness of Your Europe is low – when prompted only 6% (of 501 respondents) stated they had heard of You Europe; and, only 30% Routing to national member state information pages and assistance services is through Your Europe. Therefore, citizens, businesses, and consumers need to find Your Europe in order to benefit from coordination between EU and member state information and assistance services. While this seems an</td>
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<td>of business and citizens knew that Your Europe covers both consumer and business issue. <strong>Commission response at the 13th Meeting of IMCO DSM WG:</strong> A search facility will be added to Your Europe in all EU languages. The facility will direct users to relevant EU portals or national portals. At national level information will need to be provided in at one other national language. A question was posed at the IMCO meeting, that the SDG provided an opportunity to establish a European search engine. As such, it would need to carefully considered and regulation may be required.</td>
<td><strong>Assessment:</strong> Partially met. Main reason is limited interlinking between national sites and Your Europe. Utilise key solutions (FAQ, online enquiry forms, language translation, search engine optimisation, cooperation with national organisations)</td>
<td>Improvement in interlinking and routing, it remains one directional from Your Europe to individual MS competent authority web portals.</td>
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<td>A common search facility and assistance service finder to guide users to the right service. Provision of information in at least one other foreign language at national level. Single Gateway co-ordination group and stakeholder network. The SDG utilises key solutions, but appears to be one directional in terms of search functions and online enquiry forms (as previously identified) The use of smart search tools will assist users to find the information and procedures they require, however as previously stated, this search facility appears to be one directional – based on the Your Europe page with limited operability the other direction from national portals to Your Europe and between national portals. Provision of information on national portals in at least one other commonly used language will assist in overcoming language barriers. SDG coordination group which overcomes the silo based management approach. <strong>Commission response at the 13th Meeting of IMCO DSM WG:</strong> Member states will be required to translate materials into at least one other EU language. Standard search engine searches (e.g. Google) will find Your Europe.</td>
<td><strong>Assessment:</strong> Met, however as noted the functions appear to be one directional always starting for Your Europe. Therefore the findability of Your Europe will be key. It is not known if awareness of Your Europe has changed since 2013 as no update of the research has been conducted or published.</td>
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<td>Each individual service within the common platform should provide information about national level issues within its</td>
<td>Common list of information topics to be available on Your Europe and national websites. Annex II of the proposed regulation</td>
<td>Findability was identified as the most important quality criteria for online services in the public consultation conducted as part of the Impact Assessment (82% of business and 72% of consumers). The 2013 Single Point of Contact study found that the framework of member state services vary considerably. For example, in the UK, Hungary and Bulgaria, government e-services are well developed Information provision is to be left up to member states, there will be no common structure between the Your Europe and member state services. This will not improve findability and accessibility for users.</td>
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<td>remit and access to relevant national organisations</td>
<td>lists 13 procedures that should be fully accessible online for domestic and foreign users (timeline for implementation to be agreed per member state). Common user feedback tool to identify problems at Commission and member State level, with joint monitoring of quality criteria.</td>
<td>with a central government portal providing entry to many single points of contact and facilitating electronic administrative procedures. Other countries such as Italy, France and Germany were fun to have a more disaggregated organisation with online services provided at the regional level. <strong>Commission response at the 13th Meeting of IMCO DSM WG:</strong> The coverage and quality of information varies at member state level. Article 5 of the proposed regulation sets out the procedures that will be required to be provided online and accessible for both domestic and cross-border users. By fully centralising information (Option 1), the Commission would take away ownership from the member states. The Commission wants to collaborate with member states and does not want to duplicate or waste good systems that already exist at member state level. The establishment of a common feedback form on all linked portals at European and national level will allow the EC and member states to collect user statistics. This will help to determine quality, user friendliness and barriers to procedures experienced by user.</td>
<td><strong>Assessment: Partially met</strong></td>
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7. **Recommendations**

Following the assessment of the proposed Regulation for a Single Digital Gateway the following solutions could be considered to improve the draft proposal to more fully meet the recommendations of the 2013 study on a Single Point of Contact.

1. In order for Your Europe to improve access to information for consumers, citizens and business it needs to be **comprehensive in the services it covers**. There are **existing services that do not appear to be captured in the current proposal**.

2. Services should be **grouped where feasible on a user not a supplier basis**. Links between individual complimentary services from a user perspective should be provided. This will improve findability.

3. **Streamline services** if feasible between services where there is an overlap based on supplier focus not a user approach.

4. **Multi-directional search functions** and enquiry forms from other European level portals to Your Europe; and, if feasible between national level portals and Your Europe. This will help users stream to the most appropriate service as many users turn to national level information sources first.

5. Movement towards **common presentation and organisation of information between Your Europe and national portals**. If harmonisation is not feasible. Best practice guidelines could be developed by the Single Digital Gateway co-ordination group with input from stakeholders to improve user findability and access when searching for.

6. Consider and assess how best to **promote the SDG, including planning and promotion**. This could be institutional approaches such as working groups or other bodies to promote the SDG. The SDG co-ordination groups could potentially be used for this purpose.

7. At a procedural level, **regular surveys to assess the level of awareness across EU citizens and business**. This extends beyond surveys of users.
2 European Parliament (2016) Reducing costs and barriers for Businesses in the Single Market, a report for the IMCO Committee
3 European Parliament (2013) A European Single Point of Contact IP/A IMCO/ST 2012-17
4 France; Portugal; Sweden; Italy; Hungary; United Kingdom; Bulgaria; Slovenia; Germany; and, the Netherlands.
5 The survey was conducted in Portugal, Hungary, Italy, Bulgaria and the UK. 100 consumers and 50 SMEs took part.
9 European Commission (2017) Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs Study on information and assistance needs of businesses operating cross-border within the EU including gap and cost analysis.
11 European Commission (2014) Study in e-government and the reduction of administrative burden, final report EY, Danish Technology Institute
12 European Commission (2017) proposal for a regulation on establishing a single digital gateway to provide information, procedures, assistance and problem solving services COM (2017) 256 final.
14 European Parliament (2013) A European Single Point of Contact IP/A IMCO/ST 2012-17
15 European Commission (2017) Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs Study on information and assistance needs of businesses operating cross-border within the EU including gap and cost analysis.
17 European Commission (2017) proposal for a regulation on establishing a single digital gateway to provide information, procedures, assistance and problem solving services COM (2017) 256 final.
18 European Parliament (2016) Reducing costs and barriers for Businesses in the Single Market, a report for the IMCO Committee
20 European Commission (2017) Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs Study on information and assistance needs of businesses operating cross-border within the EU including gap and cost analysis.
21 European Commission Strategy and Corporate Communication Europa Site (2014) Transforming our online communication user survey results