

STUDY

Requested by the IMCO committee



The role of Points of Single Contact and other information services in the Single Market



Policy Department for Economic, Scientific and Quality of Life Policies
Directorate-General for Internal Policies
Authors: Pau SALSAS-FORN et al.
PE 658.179 - October 2020

EN

The role of Points of Single Contact and other information services in the Single Market

Abstract

This study analyses the role and development of Points of Single Contact and other information services. It reviews recent policy documents, and identifies a range of weaknesses for the provision of contact points. The main recommendations are to improve monitoring (using the indicators and the Single Market Scoreboard) and make use of infringement proceedings in case of non-compliance. The actions could build on the instruments available under the recent Single Digital Gateway Regulation.

This document was provided by the Policy Department for Economic, Scientific and Quality of Life Policies at the request of the committee on Internal Market and Consumer Protection (IMCO).

This document was requested by the European Parliament's committee on Internal Market and Consumer Protection.

AUTHORS

Pau SALSAS-FORN (director), Europe Economics
Giulia TOGNACCI, Europe Economics
Sophie VANCAUWENBERGH, Milieu Consulting SRL
Emma PSALIA, Milieu Consulting SRL
Caterina MARIOTTI, Milieu Consulting SRL

ADMINISTRATORS RESPONSIBLE

Christina RATCLIFF
Mariusz MACIEJEWSKI

EDITORIAL ASSISTANT

Roberto BIANCHINI

LINGUISTIC VERSIONS

Original: EN

ABOUT THE EDITOR

Policy departments provide in-house and external expertise to support European Parliament committees and other parliamentary bodies in shaping legislation and exercising democratic scrutiny over EU internal policies.

To contact the Policy Department or to subscribe for email alert updates, please write to:

Policy Department for Economic, Scientific and Quality of Life Policies

European Parliament

L-2929 - Luxembourg

Email: Poldep-Economy-Science@ep.europa.eu

Manuscript completed: October 2020

Date of publication: October 2020

© European Union, 2020

This document is available on the internet at:

<http://www.europarl.europa.eu/supporting-analyses>

DISCLAIMER AND COPYRIGHT

The opinions expressed in this document are the sole responsibility of the authors and do not necessarily represent the official position of the European Parliament.

Reproduction and translation for non-commercial purposes are authorised, provided the source is acknowledged and the European Parliament is given prior notice and sent a copy.

For citation purposes, the study should be referenced as: Salsas-Forn, P. et al., *The role of Points of Single Contact and other information services in the Single Market*, Publication for the committee on Internal Market and Consumer Protection, Policy Department for Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg, 2020.

© Cover image used under licence from Adobe Stock

CONTENTS

LIST OF ABBREVIATIONS	5
LIST OF TABLES	6
EXECUTIVE SUMMARY	7
1. INTRODUCTION	10
1.1. Methodology	11
1.2. Structure of the document	11
2. DEFINITION, ROLE AND RATIONALE	13
2.1. Points of Single Contact	13
2.2. Contact points	16
2.3. Assessment	16
3. LATEST LEGISLATIVE DEVELOPMENTS	18
3.1. The Single Digital Gateway (SDG) Regulation	19
3.2. Overview of legislation	20
4. RECENT DEVELOPMENTS	22
4.1. The Commission Action Plan (2020)	22
5. SHORTCOMINGS	25
5.1. The "2013 study"	25
5.2. Problems identified in the SDG impact assessment (2017)	27
5.3. Problems identified in infringement proceedings	28
5.4. Assessment of shortcomings	28
6. BEST PRACTICES	30
6.1. Problems with identifying "best practice"	30
6.2. Your Europe	30
6.3. Other examples	31
6.4. Using the Single Market Scoreboard (SMS)	31
6.5. Towards outcomes-based methods	34
7. WEAKNESSES IN THE LEGAL FRAMEWORK	35
7.1. Disparity	35
7.2. Heterogeneity in the provision	36
7.3. Need for more precise guidance	36
7.4. Administrative (not user) perspective	37
7.5. No data, no benchmarking, no learning from best practice	37

7.6. Lack of enforcement powers	38
7.7. Outstanding shortcomings in the legal framework	39
7.8. Need for improved definitions of some concepts	39
8. CONCLUSIONS AND RECOMMENDATIONS	40
8.1. Use of indicators for monitoring purposes	40
8.2. Enforcement	41
8.3. Complementary legislative and implementing initiatives	42
8.4. Some issues are of a secondary nature	42
8.5. Input-based regulatory conception	43
8.6. Recommendations	43
REFERENCES	45

LIST OF ABBREVIATIONS

CJEU	Court of Justice of the European Union
EC	European Commission
ECC-Net	European Consumer Centres Network
eID	Electronic Identification
eIDAS	Electronic Identification and Trust Services
EU	European Union
EURES	European Employment Services (or European Network of Employment Services)
FAQs	Frequently Asked Questions
IMCO	EP committee on the Internal Market and Consumer Protection
LFN	Letter of Formal Notice
MS	Member State
ODR	Online Dispute Resolution
PCP	Product Contact Point
PCPC	Product Contact Point for Construction
PQD	Professional Qualifications Directive
PSC	Point of Single Contact
SD	Services Directive
SDG	Single Digital Gateway
SME	Small and Medium-sized Enterprise
SMS	Single Market Scoreboard
UK	United Kingdom
VAT	Value Added Tax

LIST OF TABLES

Table 1:	Document structure and link to terms of reference	12
Table 2:	List of EU contact points and their description	14
Table 3:	List of problems	27
Table 4:	Single Market Scoreboard indicators by tool	33

EXECUTIVE SUMMARY

Background

To allow for a smooth functioning of the Single Market, a range of different tools have been established to simplify the administrative procedures that service providers and citizens need to be able to operate and function across the European Union (EU).

The Services Directive established Points of Single Contact (PSCs) as one-stop shops where providers should be able to get information (on rules and formalities) and complete all procedures needed to establish themselves and grow in the Single Market. Building upon the provisions of the Services Directive, other contact points were created to improve information provision in areas such as free movement of goods, professional qualifications and consumer concerns. Some other tools have been developed for the purpose of informing businesses and citizens about different EU issues (in particular EU rights) or for facilitating transactions within the EU (for example, how to act when rights are breached, problem solving services or business support).

Aim of the study

Despite efforts to work towards a user-friendly entry point to assist citizens and businesses to find the information they need on the EU Internal Market, and repeated calls for reducing the administrative burden for their cross-border activities, significant obstacles and difficulties to access other Member States remain in this front. Therefore, the aim of the study is to:

- Define the current role of the PSCs and other information services in the EU;
- Identify areas in the regulation that prevent information points from achieving the full potential of the Single Market; and
- Provide recommendations on how the PSCs could be improved for citizens and business users.

Recent developments

The requirements on contact points contained some mandatory provisions. However, a number of weaknesses were identified in their implementation. To correct for such problems, the Single Digital Gateway (SDG) Regulation was adopted with the specific objective of overcoming the fragmented and sectoral nature of the existing one-stop shops and to make certain administrative procedures fully available online.

The Commission published in 2020 a long-term Action Plan for better implementation and enforcement of Single Market rules. Importantly, the 2020 Commission Action Plan recalls that enforcement of Single Market rules requires two important actions: the use of infringement proceedings (where needed) and close collaboration at all levels of governance.

Of interest for this study is the idea of establishing of a common feedback and process to collect user statistics. A feature that is part of the SDG Regulation.

Shortcomings and weaknesses in the legal framework

Contact points have been found as underperforming by a long list of studies and evaluations. Most recently, the Single Digital Gateway (SDG) impact assessment (2017) summarised the main problems as:

- lack of online information;
- poor quality of information and assistance services;
- lack of availability of online procedures (especially for non-national users);
- poor awareness of their existence
- limited accessibility for foreign users; and
- a lack of overview of their general performance.

We have identified a number of weaknesses of some of the directives and legislation surrounding contact points. We have assessed these in relation to the provisions foreseen in the SDG regulation and conclude that:

(1) the implementation of the SDG has the potential to correct a large number of these weaknesses, in particular in relation to quality requirements, monitoring and enforcement; and

(2) the areas where some clarification or supporting measures might be needed are: indicators for monitoring the quality of services provided, complementary measures for electronic identification and cross-border payments.

Conclusions and recommendations

In summary, we have two main recommendations (recommendations 1 and 2), both stemming from the identified problem of lack of incentives in the implementation of the contact points. There are three additional recommendations (3, 4 and 5) that could provide a basis to be developed in the future.

Recommendation 1: improve monitoring.

The following should be considered:

- Taking full advantage of the objective indicators already provided by the SMS;
- Developing new indicators according to the PSC Charter and to the principles established in this study;
- Exploiting Articles 24, 25 and 26 of the SDG Regulation to enhance performance monitoring, including in the implementing act to be adopted by the Commission;
- Proposing objective measures (based for example on the time taken by a researcher to find certain information or complete a certain process); and
- Encouraging the Commission to break the data down when fulfilling its reporting obligation so that comparison and benchmarking can be done.

Recommendation 2: improve enforcement.

The following should be considered:

- Using the Commission's power to initiate infringement proceedings as introduced by the SDG Regulation in case of non-compliance by Member States.

Recommendation 3: complementary legislative and implementing initiatives.

The following should be considered:

- Harmonising acceptance of remote identification methods under the current revision of the eIDAS Regulation and promote the use of electronic identification in the context of the SDG Regulation; and
- Supporting the removal of remaining practical barriers during the implementation of the SDG Regulation, in particular related to the submission of electronic evidence in the context of an online procedure and cross-border payments.

Recommendation 4: present new clear definitions and avoid the use of the same terminology for different concepts.

The following should be considered:

- Clarifying and defining the different instruments and concepts relating to contact points; and
- Providing homogeneity in the concepts and terminology used in different regulations and policy documents.

Recommendation 5: move to outcomes-based approaches for the evaluation and monitoring of contact points.

The following should be considered:

- Progressively abandoning prescriptive approaches about particular designs of contact points (and in particular, portals) and start using outcomes-based approaches;
- Taking into account experiences from broader regulatory practices (for example, regulation of utilities); and
- Encouraging learning from the successful experiences of different Member States.

1. INTRODUCTION

Both citizens and businesses have greatly benefited from the European Single Market. Reducing barriers across Member States has allowed freer movement and a wider choice of goods and services around the Union. Through the simplification of rules, the legal and justice system is now more harmonised and, as such, it should enable citizens and businesses to better understand their rights and duties beyond the borders of the Member State where they reside or normally operate. The Single Market is also characterised by the principle of non-discrimination where all citizens and companies are treated equally and in a non-discriminatory manner so that the provision of goods and services should be as easy across borders as it is within each individual Member State.

However, although the Single Market has gone a long way, there are still some obstacles to the full achievement of its potential. Often these relate to the delay in many Member States to integrate the technological developments that characterise our time and hence benefit from the possibilities these offer in terms of (cross-border) accessibility to information and services. Hence, obstacles might arise in contexts where the retrieval of accurate and relevant information online and the completion of specific administrative procedures online is, when possible at all, time consuming, complicated and expensive.

In recent years, a number of EU institutions and publications have identified areas of improvement, in particular in the provision and delivery of EU-related information.

In 2012, the Commission Communication on Better Governance of the Single Market identified the use of smarter information technology tools to inform businesses and citizens as one of the four key aims to improve the effectiveness of the Single Market for businesses and citizens¹. The Commission highlighted the role and further development of online portals for citizens and businesses to improve the understanding of their rights (and minimised difficulties encountered when trying to exercise them).

In 2015, the Commission Communication "A Digital Single Market Strategy for Europe" reinforced this concept by emphasising the role of the internet and digital technologies in changing how citizens and businesses operate, and its potential source of growth². A year later, the Commission Communication on the "EU e-Government Action Plan 2016-2020" cited amongst one of its actions for 2017 the creation of the Single Digital Gateway: a European single-entry point linking the European and national level portals, websites, services and systems³.

The European Parliament has also frequently called for the consolidation of online administrations for citizens and businesses (such as SOLVIT and the European Consumer Centres) and the need to promote progressively more inter-connected procedures to deal with problem solving, to enhance efficiency and ease of use, and to minimise overlaps⁴. In 2010, the IMCO committee called on the Commission to design guidelines with regards to the advancement and interlinking of various problem solving mechanisms to accomplish these objectives. This included further improvement and advancement of the Your Europe portal, which should be regarded as the single gateway to all the relevant information; and of the Points of Single Contact to enhance the user friendliness, the ease of accessing information, and the completion of administrative procedures online. In addition, the European Parliament called

¹ European Commission (2012). Better Governance of the Single Market, COM(2012)259 Final.

² European Commission (2015). A Digital Single Market Strategy for Europe, COM(2015)192 Final.

³ European Commission (2016). EU e-Government Action Plan 2016-2020, COM(2016)179 Final.

⁴ European Parliament (2010). Report on Governance and Partnership in the Single Market, 2010/2289(INI).

European Parliament (2010). Report on delivering a single market to consumers and citizens, 2010/2011(INI).

European Parliament (2010). Resolution of 9 March 2010 on SOLVIT, 2009/2138(INI).

on Member States to raise public awareness on EURES (European Employment Services) in order to allow citizens to benefit from the increased employment opportunities made available across the EU.

1.1. Methodology

This study involves a comprehensive review of already published policy documents analysing some of the existing issues and provides an assessment of what we consider the main strengths and weaknesses of the current provision and regulation of contact points. Through an in-depth analysis based on policy regulation and evaluation principles (and economic thinking and legislative reasoning), we provide recommendations on policy options and actions for improving these. Our method uses the findings of a previous 2013 study ("A European Single Point of Contact")⁵ as a starting point. In relation to those findings, we assess any evolution by looking at evidence from other research studies and evaluations.

We should note that because of the scope and time frame of the current study, an exhaustive review has not been possible. The reviewed studies, however, are enough to provide an overview of the recent policy developments (most studies cross-reference others, so the main discussions recently developed around this topic have been incorporated in this study)⁶.

1.2. Structure of the document

The structure of the document follows the suggestion by the Policy Department for Economic, Scientific and Quality of Life Policies to align the chapters with the items in the terms of reference. It was agreed that this way the reader would be able to quickly find the themes required in the research. The following chapters constitute the rest of this document. Their correspondence with the items in the terms of reference is reflected in the table below.

⁵ This was part of the requirements requested by the European Parliament.

⁶ The research undertaken for this study excludes the recent IMCO DRAFT (2020) report, as this is currently under discussion. The committee draft report contains amendments which were tabled in committee on 17/06/2020. It is currently awaiting committee decision (an indicative plenary sitting date, 1st reading/single reading, is scheduled for 24/11/2020).

Table 1: Document structure and link to terms of reference

CHAPTER 2 Definition, role and rationale	Refer to available assessments and formulate its own assessments of the current role of the PSCs and other information services in the EU;
CHAPTER 3 Latest legislative developments	Provide analysis based on the latest legislative developments in this area for services and products;
CHAPTER 4 Recent developments	Take into account any recent developments from the European Commission;
CHAPTER 5 Shortcomings	Identify examples of shortcomings to be tackled (for example level of fees or other administrative requirements);
CHAPTER 6 Best practices	Identify examples of best practices (within the EU or at international level) that can serve as models to follow in Member States;
CHAPTER 7 Weaknesses in the legal framework	Assess, on the basis of a broad variety of sources, including (if any) academic literature, infringement procedures (LFNs sent on 6 June 2019) and EU pilots, court cases and EC working papers, in which areas the legal framework (that addresses directly or indirectly the PSCs) impacts or fails to impact the achievement of the full potential of the Single Market;
CHAPTER 8 Recommendations	Identify clear recommendations on how the PSCs could be improved and made more visible, particularly for citizens and business users.

Source: Authors' own elaboration.

The range of points of contact and information services in the EU is very large. In the rest of the document, Points of Single Contact (PSCs and others) and other different information services will be referred to as "contact points".

2. DEFINITION, ROLE AND RATIONALE

KEY FINDINGS

A number of contact points have been set up to provide information and procedures needed to operate in and make use of the Single Market. These cover areas such as: free movement of goods and services; professional qualifications and consumer protection. Other tools provide information to businesses and citizens about different EU issues or facilitate transactions within the EU.

The rationale behind contact points is to allow for a smooth functioning of the Single Market. They aim to achieve the following objectives:

- **Information:** inform people about their rights under EU law;
- **Speeding up administration:** enable users to make use of their rights by simplifying and speeding up administrative procedures; and
- **Problem solving:** solve problems when EU rights have been breached.

To allow for a smooth functioning of the Single Market, a range of different tools have been established to simplify the administrative procedures that citizens and businesses need to be able to operate and function across the EU. This chapter describes the contact points in the EU, clarifying their particular roles, as established by the different pieces of legislation and other studies, together with a description of the rationale for the existence of such tools.

2.1. Points of Single Contact

The Services Directive⁷ originally established Points of Single Contact as one-stop shops where providers should be able to get information (on rules and formalities) and complete all procedures needed to establish themselves and grow in the Single Market.

Since the establishment of the PSCs in 2006, a number of other contact points have been set up in other pieces of legislation. Building upon the provisions of the Services Directive, contact points were created to improve information provision in areas such as: free movement of goods (Product Contact Points - PCPs, Product Contact Points for Construction - PCPCs); professional qualifications (Professional Qualifications Assistance Centres); and consumer protection (Consumer Centres and Healthcare Contact Points). Some other tools have been developed for the purpose of informing businesses and citizens about different EU issues (in particular EU rights) or for facilitating transactions within the EU (for example, how to act when rights are breached, problem solving services or business support).

A list of EU contact points is provided in Table 2, below.

⁷ Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market.

Table 2: List of EU contact points and their description

Contact point	Short description
Points of Single Contact	Points of Single Contact were established by the Services Directive. They are e-Government portals that allow service providers to get the information they need (on a range of practical issues, for example registration, licence, recognition of professional qualifications) and complete administrative procedures online. They are managed by the "EUGO network" of national coordinators, and are there to help businesses with three important operational aspects: online information; online completion of procedures and formalities; and assistance by telephone or email.
Product Contact Points (PCPs)	Regulation (EU) 2019/515 on the mutual recognition of goods imposes the establishment of a Product Contact Point (PCP) in each EU country. The scope of a PCP is generally twofold: to provide (free of charge) a personalised response within 15 days to specific queries concerning the regulation; and to make information available online (on the principle of mutual recognition and the application of Regulation 2019/515). At the request of a business or of a competent authority of another EU country, PCPs also need to provide information on the technical rules, administrative procedures, and necessary authorisations applicable to specific goods.
Product Contact Points for Construction (PCPCs)	Product Contact Points for Construction (PCPCs) are a particular kind of PCP. Hence, the same requirements stated above hold true for PCPCs as well. However, these also have to comply with additional rules, and they should provide information about (Regulation (EU) No 305/2011): rules applicable to the incorporation, assembling or installation of specific types of construction products; provisions aimed at fulfilling basic requirements for construction works applicable to the intended use of each construction product in the relevant territory (free of charge); and other issues (for which PCPCs are allowed to charge fees proportionate to the costs of providing such information or observations).
Professional Qualifications Assistance Centres	Directive 2005/36/EC on the recognition of professional qualifications required each Member State to establish a contact point by the end of October 2007. Together, these contact points form a collaborating network with a task to: provide citizens and contact points of other Member States with information concerning the recognition of professional qualifications provided for in the Directive (e.g. information on the national legislation governing the professions and the pursuit of those professions, including social legislation, and, where appropriate, the rules of ethics); and assist citizens in exercising their rights under the Directive (where appropriate, in cooperation with other contact points and the relevant authorities in the host Member State).
Consumer Centres	The European Consumer Centres Network (ECC-Net) is an EU-wide network made up of 30 centres, one in each of the Member States and also in Iceland and Norway. The mission of the network is to assist consumers in fully benefiting from the Single Market, by enhancing trust in cross-border shopping. The ECC-Net helps consumers across the EU by providing the following services free of charge: information about their rights when buying goods and services in another EU country; advice concerning any problems that arise; and assistance in handling their complaints. The ECC-Net also observes trends and issues arising in connection with cross-border transactions in the Single Market and, looking to the future, the Digital Single Market.
Healthcare Contact Points	Directive 2011/24/EU sets out the need for appropriate information on how cross-border healthcare functions in order to allow EU patients to fully benefit from their rights. Among the initiatives set up with this aim, the Directive requires each Member State to establish national healthcare contact points, which are required to: specify the information to be provided compulsorily to patients; provide information in all the official languages of the Member State where they are established; and ensure consultation with patients' organisations, healthcare insurers and providers. Each Member State could decide how and how many contact points to establish, and these could also be introduced by building on existing facilities.

Contact point	Short description
Enterprise Europe Network	The Enterprise Europe Network is a support network for Small and Medium-sized Enterprises (SMEs) that want to do business abroad within the EU or beyond. The Network helps them to access European and international markets, and provides them with growth-oriented integrated business and innovation support services to help strengthen their competitiveness and sustainability.
European Employment Services (EURES)	EURES (Regulation (EU) 2016/589) is a cooperation network designed to facilitate the free movement of workers within the EU and countries in the European Economic Area. Partners in the network include public employment services, private employment services, trade unions and employers' organisations.
Online Dispute Resolution (ODR) platform	The ODR platform, established by Regulation (EU) No 524/2013, is a web-based platform developed by the European Commission, operational since February 2016. Its objective is to help consumers and traders resolve their contractual disputes about online purchases of goods and services out-of-court at a low cost in a simple and fast way. It allows consumers to submit their disputes online in any of the 23 EU languages.
SOLVIT	SOLVIT is a free of charge out-of-court problem solving service for EU citizens and businesses who consider that their EU rights are not respected by a public administration in another Member State. Complaining users introduce their request through a simple online form. If the request fulfils certain criteria (e.g. no related legal proceeding on-going), it is dealt with through a network of SOLVIT offices with the office in the complainant's home country contacting the office of the Member State where (allegedly) administrative decisions are infringing the complainant's EU rights. Requests are as a rule dealt with within 10 weeks.
Your Europe	Your Europe (Your Europe Action Plan - COM(2013) 636 final) offers information to EU citizens and businesses about their basic rights under EU law, about how these rights are implemented in each individual country (where information has been provided by the national authorities) and it gives access to free email or telephone contact with EU assistance services, to get more personalised or detailed help and advice.
Your Europe Advice	Your Europe Advice is part of a set of information and advice tools for citizens and businesses about their EU rights. The starting point is the Your Europe website designed to give information about rights across Europe.
Europe Direct Information Centres	The European Commission manages a network of information centres, documentation centres and speakers in every EU country. They provide answers to questions on EU rights, funding, etc.; access to EU documents and publications including detailed information on European law, policies and institutions; references to other information sources and contact details for relevant organisations. They also organise training for students on EU-related fact-finding and research; help to find an EU expert speaker (lawyers, consultants, academics) for EU-focused events and operate a free of charge call service.
EU Intellectual Property Rights Helpdesk	The European Intellectual Property Rights Helpdesk supports cross-border SME and research activities to manage, disseminate and valorise technologies and other Intellectual Property Rights and Intellectual Property assets at EU level. Services include information material in the form of newsletters and an online library, a free Helpline service through phone or fax for direct and confidential Intellectual Property support by legal specialists and on-site and online training. Services are available in 13 EU languages and Turkish.
The European e-Justice portal	The portal provides information and links on laws and practices in all EU countries about practical questions like finding a lawyer, consulting a land register or finding basic information about a judicial system. The target audience are citizens, businesses, lawyers and judges with cross-border legal questions.

Contact point	Contact point
Technical Regulation Information System database	The Technical Regulation Information System database is an information tool aimed at allowing companies to detect upcoming national technical regulations that might affect the marketing of their products in the Single Market.
VAT Information portal	This European Commission webpage offers basic information about value added tax rules and procedures in the EU. As most of them are decided at national level, the portal links to the respective national websites.
EU Trade Export Helpdesk	The EU Trade Export Helpdesk offers information to companies in third countries exporting goods to the EU. Through the European Commission website they can find information on EU tariffs, requirements (e.g. plant health, public health, labelling, etc.), preferential arrangements, quotas and statistics relating to imports from trade partner countries.

Source: SDG impact assessment (2017) and own elaboration.

2.2. Contact points

Contact points have been previously defined as "online portals and websites with the primary aim of enabling citizens and businesses to access the benefits of, and exercise their rights within, the Single Market in their day-to-day activities and to minimise obstacles incurred". As such, "online contact points facilitate interactions between citizens and administrations, business and administration and consumers and business" (see "A European Single Point of Contact", 2013).

In the context of the Single Digital Gateway (see Chapter 3), contact points have been related to the need of businesses and citizens to know their EU rights and how to make use of them. The intervention logic of the SDG impact assessment (2017) evaluates that these points of contact are expected to bring increased awareness of and confidence in Single Market rights and opportunities. This is expected to ultimately lead to a better functioning of the Single Market and increased cross-border activities (doing business, working, studying, residing, shopping).

The importance of contact points for achieving the objectives envisaged in the Single Market seems to be repeatedly acknowledged in different places. For example, the Commission's website on points of contact recognises these as aiming to help the European service sector reap the benefits of the Single Market by making national information on rules and formalities, and national procedures available online. More recently, the Commission Action Plan (2020) envisages the role of contact points (under the SDG) to increase the knowledge of the applicable rules and the obligations for businesses and to reduce the cases of non-conformity and non-compliance. This should be done by providing access to comprehensive information on Single Market rules and administrative procedures and also by directing users to the most relevant assistance services.

2.3. Assessment

The rationale behind contact points is to allow for a smooth functioning of the Single Market. This seems to be an uncontroversial statement in the different documents and legislation relating to such tools.

The different directives relating to contact points explain how these aim to support and enhance the functioning of the Single Market. In most cases, the introductory provisions to the directives explain that the creation of a contact point is aimed at the simplification of the administrative process at EU level and at the provision of an internet portal where relevant information can be found and where formalities and administrative procedures can be completed online. Furthermore, the rationale

includes the provision of information concerning the technical rules in force in the various Member States and/or understanding the recognition procedures applicable to the various career paths in the different Member States.

Although there is no dispute on the role and importance of contact points, one aspect that might be worth clarifying is the different objectives these aim to achieve. These can be summarised into three categories (these characteristics have been previously mentioned in "A European Single Point of Contact", 2013):

- **Information:** inform people about their rights under EU law;
- **Speeding up administration:** enable users to make use of their rights by simplifying and speeding up administrative procedures; and
- **Problem solving:** solve problems when EU rights have been breached.

Their importance can also be seen in relation to the principles established in the Better Regulation Toolbox. Contact points are mentioned as examples of measures to overcome regulatory barriers (to allow EU companies to access the market). Information availability (assessing, for example, whether the procedures to be followed are clear, transparent and publicly available, and whether companies and citizens can easily enforce their rights), and costs savings are also recognised as reasons for intervention in the Better Regulation Toolbox.

3. LATEST LEGISLATIVE DEVELOPMENTS

KEY FINDINGS

The requirements on contact points contained some mandatory provisions. However, a number of weaknesses were identified in their implementation. To correct for such problems, the Single Digital Gateway (SDG) Regulation was adopted with the specific objective of overcoming the fragmented and sectoral nature of the existing one-stop shops and to make certain administrative procedures fully available online. Importantly:

- The SDG Regulation establishes detailed quality requirements for the provision of information and for assistance and problem solving, as well as a legally binding obligation for Member States to allow for the completion of certain administrative procedures entirely online. It is an important instrument for the Commission to improve the functioning of contact points and to take legal action against non-compliant Member States; and
- The SDG Regulation contains new reporting requirements focused on user experience: user feedback and user statistics, which should help track progress and identify weaknesses.

The requirements on contact points contain mandatory wording with regard to the provision of information and completion of online procedures. However, a number of weaknesses were identified in their implementation and in the formulation of the corresponding legal provisions. Weaknesses such as the absence of harmonised quality requirements, and of a legal obligation to enable the full online completion of procedures, were emphasised during the preparatory works on the adoption of the Single Digital Gateway Regulation (see also Chapter 5)⁸.

The lack of binding quality requirements for contact points in the legislation have resulted in an enforcement gap (see Chapter 7). As the Commission's legal powers under the Treaty are limited to the provisions included in the Treaties and secondary legislation, legal action against the Member States in the past was mostly related to other more precise binding obligations in these instruments and to the delays in establishing contact points⁹.

Several legislative initiatives have recently been taken to remedy the problems identified, with the strategic objective of modernising contact points, achieving cross-border interoperability and greater accessibility to these services by citizens from another Member State (set out in the 2016 e-Government Action Plan)¹⁰. Rather than amending existing legislation, these initiatives aim at remedying some of the problems identified as part of a broader digital strategy.

⁸ The identified weaknesses in relation to existing legal instruments on points of contact were: legal provisions formulated in an administration-centred manner (lack of focus on user needs); no requirement for completion of procedures online; no harmonisation of quality requirements (with regard to the provision of information or completion of online procedures); no requirements on technical standards for online completion of procedures; requirements on accessibility of information in other languages included in the SD and PQD (however, this requirement is formulated in a non-mandatory manner); no requirement to make the points of contact actively known to end-users; no results-oriented obligations for national administrations; legal basis for the adoption of further implementing measures by the Commission limited to specific issues. See Proposal for a Regulation of the European Parliament and of the Council on establishing a single digital gateway to provide information, procedures, assistance and problem solving services and amending Regulation (EU) No 1024/2012, COM(2017)256 final, 2 May 2017.

⁹ Since the adoption of the SD and PQD, only one case was brought before the CJEU in relation to PSCs, relating to the delay in establishing a contact point. No other infringement actions were taken against Member States in relation to PSCs.

¹⁰ European Commission (2016). EU e-Government Action Plan 2016-2020, COM(2016)179 Final.

3.1. The Single Digital Gateway (SDG) Regulation

The 2018 Single Digital Gateway (SDG) Regulation (Regulation (EU) 2018/1724) was adopted with the specific objective of overcoming the fragmented and sectoral nature of the existing one-stop shops and to make certain administrative procedures fully available online.

The SDG Regulation:

- Centralises access to information on rights, obligations and rules laid down in EU and national law applicable to users exercising their EU Internal Market law rights, as well as on certain national administrative procedures into **one single gateway**, which meets minimum quality requirements set out in the SDG Regulation.
- Sets **detailed binding quality and accessibility requirements** for non-national users relating to the provision of information on rights, obligations and rules, on procedures and on assistance and problem solving services.
- Requires **certain procedures to be offered fully online** (Article 6). This covers all procedures listed in Annex II of the SDG Regulation, such as an application for study financing, recognition of diplomas, a notification of business activity or the submission of an income or corporate tax declaration.
- Requires Member States to ensure that the information provided on **information on rights, obligations and rules** is, inter alia:
 - **user-friendly**, enabling users to easily find and understand the information and to easily identify which parts of the information are relevant to their particular situation;
 - **accurate and sufficiently comprehensive** to cover information that users need to know in order to exercise their rights in full compliance with applicable rules;
 - inclusive of the contact details of any relevant assistance or **problem solving services**; and
 - written in **clear and plain** language **adapted to the needs of the target users** and allowing them to quickly find the information they need.
- Requires Member States to ensure that users have access to a sufficiently **comprehensive, clear and user-friendly explanation of key elements** on information procedures, such as the relevant steps of the procedure and the means of redress or appeal.
- Requires Member States to ensure that users of contact points (PSCs, PCPs, PCPCs, national assistance centres for professional qualifications, national contact points for cross-border healthcare, EURES and online dispute resolution), have access to a **clear and user-friendly explanation** of elements including: the type, purpose and expected results of the service offered; the contact details of the entities responsible for the service; any additional languages in which the request can be submitted and which can be used in subsequent contacts.
- Includes a legal requirement to make the information described above **accessible in an official EU language**, understood by the largest possible number of cross-border users (see Articles 9(2), 10(4) and 11(2)).
- Requires Member States to ensure that users, including cross-border users, have **easy online access** through different channels **to the various contact points** (Article 7).

- Establishes **mandatory quality requirements** for contact points, under Article 16, to ensure that:
 - these services are provided within a reasonable timeframe;
 - in case of deadline extensions, users are informed in advance; and
 - users are able to pay any fees online.
- Sets mandatory requirements to ensure **cross-border access to online procedures** (Article 13).
- Sets binding **awareness-raising and promotion requirements** of the SDG and PSCs (Article 23).
- Establishes binding quality monitoring requirements for the national administrations and the Commission, including the **collection of user statistics and user feedback** (see Articles 17, 24 and 25).

The operational provisions of the SDG will enter into force on 12 December 2020, hence its full impact will become visible following this date¹¹. Some impact might be seen earlier, as a first revised Regulation¹² was adopted in 2019 (the revised Regulation refers directly to the SDG Regulation and requires Member States to ensure that the PCPs deliver their services in accordance with this regulation).

The specific formulation and direct effect of the legal requirements in the SDG Regulation should harmonise the quality requirements for online procedures and the provision of information to a greater extent. It should also enable the Commission to enforce quality in the services offered online through the contact points.

3.2. Overview of legislation

The recent changes to the legal framework for contact points following the adoption of the SDG Regulation constitute an important step forward from the existing legal requirements, which were considered to have significant weaknesses due to their fragmented, administration-focused and general nature. The requirements will apply to all information services listed in Annex I, procedures listed in Annex II and all services listed in Annex III to the SDG Regulation, including the PSCs, PCPs, PCPCs, PQD assistance centres, national contact points for cross-border healthcare, EURES and ODR. While certain stronger provisions introduced in the Commission's legislative proposal were not ultimately retained (e.g. the explicit requirement to provide access in a non-discriminatory manner), the new requirements that were adopted are considered a significant strengthening of the legal framework on contact points.

It should be noted that further measures are currently being developed to complete the legal framework for e-Government procedures at national level and to further enhance the functioning of the above-mentioned services and contact points. These include technical initiatives, such as a European Interoperability Framework for increasing the interconnection of public services and a Core Public Services Vocabulary which should facilitate the translation of content and the development of a search tool. Other initiatives aim at continuing the services (that were provided at the outset) during

¹¹ The provisions on full access to online procedures (Articles 6 and 13), among others, will only enter into force from 12 December 2023.

¹² Regulation (EU) 2019/515 on the mutual recognition of goods lawfully marketed in another Member State replaced the former Regulation on Product Contact Points (Regulation (EC) 764/2008).

the company's lifecycle and operations in other Member States.

The future regulatory requirements for contact points under the SDG Regulation, which will enter into force at the end of 2020, should therefore provide a more harmonised and robust framework for their development and operation in the Member States and better meet the needs of EU citizens and businesses in cross-border activities. The specific requirements, including quality requirements for the information to be provided, and the mandatory full digitalisation of an important number of administrative procedures in the SDG Regulation, will provide an enhanced legal basis for enforcement action by the Commission against Member States that do not comply. At the same time, the user statistics collected under the SDG Regulation should help identify which procedures are frequently used and where problems may remain. The importance of both points was emphasised by the European Commission during an interview undertaken during the research for this study.

In summary, the importance of the SDG Regulation is that it should provide a new legal basis for enforcement action by the Commission and, with that tool, make Member States more cooperative during the previous stages where non-compliance is resolved informally.

4. RECENT DEVELOPMENTS

KEY FINDINGS

The Commission published in 2020 a long-term Action Plan for better implementation and enforcement of Single Market rules. Importantly, the 2020 Commission Action Plan recalls that enforcement of Single Market rules requires two important actions: the use of infringement proceedings (where needed) and close collaboration at all levels of governance.

Of interest for this study is the idea of establishing of a common feedback and process to collect user statistics. A feature that is part of the SDG Regulation.

4.1. The Commission Action Plan (2020)

Very recently, the Commission published a long-term Action Plan for better implementation and enforcement of Single Market rules¹³. The Action Plan recognises the many regulatory and administrative barriers encountered by market operators and investors that are still present when exercising their free movement rights in the EU. The Action Plan stems from current enforcement challenges, and in particular, from the fact that sometimes, "Member States breach agreed Single Market rules, or create and tolerate obstacles in national law, with the aim of creating additional protection in their market and deriving advantages for national businesses".

The Action Plan recalls that enforcement of Single Market rules requires two important actions. On the one hand, it requires that these are correctly applied and that breaches are sanctioned (including through the use of infringement procedures, when needed). On the other hand, the achievement of the benefits of the Single Market requires close collaboration at all levels of governance in the EU (local, regional and EU authorities) and support (Member States and Commission in their respective roles):

- For the first requirement (correct application of Single Market rules), the Action Plan envisages using the Single Market Scoreboard (SMS). The SMS will provide both Member States and the Commission with a useful monitoring tool (although it is expected that the Commission will update the SMS with additional indicators to assess areas where it is expected to deliver most and to better reflect the end-users' situation in the Single Market); and
- To improve coordination and communication on specific enforcement, the Action Plan mentions the creation of a joint Single Market Enforcement Task-Force and a new cooperation network between national enforcement coordinators (which will make use of the existing Internal Market Advisory Committee to allow exchanges of information and best practices).

The Action Plan is focused on regulatory and administrative barriers, but also on illicit, dangerous products and services, and lack of practical surveillance and inspection¹⁴. In relation to contact points, the most relevant recommendations are the following:

- **Information to be provided by the Single Digital Gateway.** The increase in knowledge and awareness relies on a number of tools (publication of guidance and setting up points for exchange of information). However, it is worth noting the importance the plan allocates to the

¹³ Long term action plan for better implementation and enforcement of single market rules. COM(2020) 94 final. Brussels, 10.3.2020.

¹⁴ It is based on a number of stages (from increasing knowledge and awareness of Single Market rules, to improving their transposition, implementation and application, and also on detecting non-compliance, strengthening enforcement and the handling of infringement cases).

SDG as a way to provide access to comprehensive information on Single Market rules and administrative procedures, and as a way to point users to the most relevant services;

- **Detection of non-compliance.** Detection will take place through a reporting tool in which citizens and businesses will be able to anonymously inform on the obstacles encountered. This would be created under the SDG, taking into account experience from the Fit for Future Platform (recently renamed from "Lighten the Load")¹⁵;
- **Ex-post intervention.** It is envisaged that SOLVIT is reinforced to become the default alternative dispute resolution tool in all Single Market policy areas involving a decision by an administration;
- **Strong action will be undertaken.** In case of apparent breaches of EU law, the Commission will seek a dialogue to better understand problems and find solutions, though it "will not hesitate to take strong and effective enforcement action" where this does not deliver results;
- **Enforcement will take place in high-priority areas.** The relevance and prioritisation of the different concerns would be assessed from structural issues identified in the complaints submitted by interested parties (a system of submission of complaints will be revised and integrated in SOLVIT; the Commission will also study the possibility of extending it to other Single Market policy areas, for example using the Online Dispute Resolution platform to assist consumers);
- **Streamline complaints.** Confidence in the enforcement system relies on complaints being examined in a timely manner and on breaches being sanctioned. To that end, the Commission will streamline its case handling processes (making a preliminary assessment of complaints within two months to allow a response to the complainant and include a clear decision on how to handle the complaint: "not pursued further"; "transmitted to SOLVIT"; "initiate dialogue"; or "immediately start an infringement procedure");
- **EU Pilot.** The EU Pilot system is a useful tool for obtaining information in the phase of dialogue with Member States at the pre-infringement stage. To make this system a rapid and effective tool, the Commission intends to use the pilot under clear conditions and timetables, and for cases for which a quick solution appears attainable. The Commission will need to develop clear and objective criteria to identify when it should be used; to identify pragmatic solutions to speed up the process; to find more flexible modes of exchange to solve complex issues; and to disseminate best practice, keeping a balance with confidentiality issues; and
- **Package meetings.** To complement written formal exchanges in infringement procedures (the basis for a Court procedure), the Commission will envisage periodic "package meetings" with individual Member States, to help find solutions (correct and end misunderstandings).

Some of these action points are not new and had been explained previously as part of the work being undertaken by the Commission. For example, the 2018 update of the "2013 study" (where the Commission's responses given at the 13th Meeting of the IMCO Digital Single Market Working Group are recorded), provides an idea of the Commission's vision and useful avenues for improving the services. These include the following up-to-date and future developments (as part of the SDG):

¹⁵ The Fit for Future Platform (<https://ec.europa.eu/info/law/better-regulation/have-your-say-simplify>) is a website where users can post their suggestions on how to improve laws and reduce regulatory burden. It reads as "At any time, you can tell us how you think existing laws and initiatives could be made more effective and efficient". "All suggestions received will be published on this site, providing they comply with the house rules, and sent for review". The website used to be called "Lighten the Load".

(1) Information in Your Europe portal separately structured for citizens and businesses, which guides users to national level information. The Single Digital Gateway co-ordination group "will look at rationalisation (using user statistics of services and feedback)".

(2) A search facility will be added to Your Europe in all EU languages (to direct users to relevant EU portals or national portals).

(3) Member states will be required to translate materials into at least one other EU language¹⁶.

(4) The establishment of a common feedback form on all linked portals at EU and national level will allow the Commission and Member States to collect user statistics. This will help to determine quality, user friendliness and barriers to procedures experienced by users.

These points were later fed into the Commission Action Plan and also into the SDG Regulation (see Chapter 3).

The action plan comes after a long stream of investigations, and concerns around the lack of progress in contact points:

- In 2013, the European Commission instituted the PSC Charter¹⁷ which created four standard criteria to be required on the PSCs. The criteria related to: quality and availability of information provided; making trans-actonal electronic procedures available online; providing accessibility for cross-border users and allow administrative steps to be completed smoothly and within a reasonable amount of time;
- Subsequently, Capgemini and Eurochambres (2015) conducted quantitative and qualitative research to provide the Commission with an assessment of the functioning of PSCs against the PSC Charter criteria¹⁸. The PSCs were found: to be poorly tailored to users' needs; to take an administrative rather than a business perspective; to have failed in introducing enough procedures which can be completed online; and to be discriminatory against users from countries different from the one for which the information is searched; and
- In an implementation evaluation, the European Court of Auditors (2016) provided an opinion on the achievements and failures of the Services Directive¹⁹. In relation to PSCs, the report identified these as a prominent feature of the Directive. However, their establishment was done with delay, and their quality varied greatly across Member States. Hence, the main recommendation in relation to PSCs was that "Member States should respect the PSC Charter". The Auditors' report also recognised the lack of enforcement mechanisms and provided recommendations in the use of EU Pilots and in prioritising infringement procedures with larger economic impact.

¹⁶ The SDG regulation requires this to be a language widely used across the European Union.

¹⁷ "Charter for the electronic points of single contact under the services directive" Ref. Ares(2016)226518 - 15/01/2016.

¹⁸ Capgemini Consulting, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (European Commission), and Eurochambres (2015). *The performance of the points of single contact*.

¹⁹ European Court of Auditors (2016). *Has the Commission Ensured Effective Implementation of the Services Directive?*

5. SHORTCOMINGS

KEY FINDINGS

Contact points have been found as underperforming by a long list of studies and evaluations. Most recently, the SDG impact assessment (2017) summarised the main problems as: lack of online information; poor quality of information and assistance services; lack of availability of online procedures (especially for non-national users); poor awareness of their existence and accessibility for foreign users; and a lack of overview of their general performance.

Many of such problems are envisaged to be remedied with the SDG Regulation. However, further supporting measures can be taken to facilitate its implementation:

- The revision of the eIDAS Regulation provides an opportunity for linking the SDG Regulation with the eIDAS and to consider harmonising the acceptance of remote identification methods, thus reinforcing cross-border accessibility; and
- Supporting measures for cross-border payments and the submission of electronic evidence in the context of the SDG.

As per the request of the European Parliament, one of the main objectives of this study was to examine how the PSCs and other information services evolved since the publication of a previous study in 2013 entitled "A European Single Point of Contact" published in 2013 (the "2013 study")²⁰.

This chapter reviews the 2013 study, alongside other evidence relevant to understanding the regulation and the requirements of different contact points. In particular, we describe the "2013 study" (and the recent update undertaken in 2018²¹). The findings from the SDG impact assessment (2017) are also described to illustrate if and how some of the identified problems are still recurring.

5.1. The "2013 study"

The 2013 study is a lengthy review of the provisions on different contact points provided in the EU. It highlights some of the identified problems and provides recommended actions.

In terms of the identified problems, the 2013 study concluded that: the framework of online services was disjointed; information services from similar areas were not linked-up; signposting between complementary services was limited; levels of awareness were very low; understanding of the functions, scope and target audience of the different contact points was limited; and users had difficulty to identify and access the most appropriate services.

The recommended actions consisted of a long list of items. The list was subsequently re-assessed in 2018, when an update of the 2013 study was undertaken. The recommendations were grouped into a new (simplified) list of points for action, with the following suggestions:

²⁰ Duke, C. et al. (2013). A European Single Point of Contact. Publication for the committee on Internal Market and Consumer Protection, Policy Department for Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg.

²¹ Duke, C. (2018). Single Digital Gateway: how EU could meet expectations of citizens and businesses? Publication for the committee on Internal Market and Consumer Protection, Policy Department for Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg.

- **Provide a single entry point** based on user needs, not supplier side models, that stream users to the relevant group of online services;
- **Improve signposting** between existing complimentary services at EU level, streamlining and grouping services (with complimentary remits) and improve links to national level services;
- **Utilise key solutions** such as Frequently Asked Questions (FAQs), online enquiry forms, language translation and search engine optimisation;
- **Improve cooperation** between EU-level services and national competent authorities and promote awareness at the level of first access. Hosting of the EU logo and link on national level organisation websites, and the inclusion within national level organisation search engines were identified as possible options;
- **Use online tools** such as electronic forms to help direct questions to the most appropriate service and make them available in all EU official languages;
- **Use internal monitoring processes** of individual services to provide improved information on performance of services against key service objectives;
- **Reduce language gaps** (using automated translation tools); and
- **Produce a common online platform** to provide information about national issues and access to relevant national organisations.

The 2018 study update also assessed the progress made towards those recommendations using a new categorisation reduced to just five items. Under this new approach the study concluded that: one recommendation was met (utilisation of key solutions), one was not met (more effective sign posting) and the rest (umbrella/single entry point; interlinking and routing; information about national level provided) have been partially met, albeit with a number of caveats:²²

- **Utilisation of key solutions [MET]:** however, "the functions appear to be one directional always starting from Your Europe". It is not known if awareness of Your Europe has changed since 2013 as no update of the research has been conducted or published;
- **More effective signposting [NOT MET]:** there is continued service focus, no interlinking between individual services and missing services;
- **Umbrella/single entry point [PARTIALLY MET]:** a more comprehensive assessment of the current state of play would have helped to better assess the needs of consumers and businesses;
- **Interlinking and routing [PARTIALLY MET]:** limited interlinking between national sites and Your Europe; and
- **Information about national level provided [PARTIALLY MET].**

²² For simplicity, we have reduced the titles of the original categories. These were: "Umbrella, single entry point, that guides and streams users to the most appropriate service based on user needs, not supplier side models"; "More effective signposting between existing complimentary online services, streamlining and grouping services that have complimentary remits and improved links to national level online services"; "Service interlinking and routing"; "Utilise key solutions (FAQs, online enquiry forms, language translation, search engine optimisation, cooperation with national organisations)"; "Each individual service within the common platform should provide information about national level issues within its remit and access to relevant national organisations".

5.2. Problems identified in the SDG impact assessment (2017)

In the preparatory work for the SDG Regulation, the Commission prepared a set of documents in which it explained the objectives of the proposal, the impact assessment and exposed the different sources and consultations undertaken. The SDG impact assessment (2017) thoroughly evaluates a range of EU contact points and concludes that overall these are "very fragmented, with varying levels of coverage and differences in quality", they are also "not user centred, difficult to find and to use, especially for foreign users". More in detail, the impact assessment provided a large list of problems, which can be aggregated into the following categories (a full description is provided in Table 3).

- Lack of online information.
- Lack of quality of the information (inaccurate, incomplete, outdated) and of the assistance services (contact points may take far too long to respond).
- Lack of fully online procedures (especially for non-national users).
- Lack of awareness (of the existence of the various portals and support services) and difficult online findability.
- Lack of accessibility for foreign users (language, form fields only accepting national data or standards), discrepancy in registration fees for domestic and non-domestic businesses.
- Lack of overview of Single Market problems: lack of performance statistics makes it difficult for EU policy-makers to identify where the obstacles are.

The findings are not surprising and follow a long trend of complaints highlighting the lack of progress in the development of contact points. The opinions are not only at the institutional level: the REFIT Platform has also commented on the lack of progress²³. The identified shortcomings are consistent with those stated in the Commission Action Plan (see Chapter 4).

Table 3: List of problems

Identified problems	Description
1- Lack of online information	Businesses often have to rely on intermediaries, incurring additional costs. Citizens find websites hard to reach or understand, and mention that they contained inaccurate or outdated information. Understanding the language is an additional problem.
2- Lack of quality of information and of assistance services	Information may be inaccurate, incomplete, outdated, not user-friendly or only available in a single language not accessible for cross-border users. Contact points may take far too long to respond or provide information that is not operational. Information supplied by Points of Single Contact is still structured according to the logic of the administration.
3- Lack of fully online procedures	Limited success in introducing online procedures, especially regarding the accessibility for non-national users, there are large variations between Member States. For many citizen important events (finding a job, moving, starting a small claims procedure, changing civil status, owning a car or studying) procedures are not available online.

²³ The impact assessment highlights how the REFIT Platform (consisting of business stakeholders and Member States representatives) also issued an opinion. It recommended using clear information and "coordinated services for businesses in each Member State to assist companies operating in the Single Market", and setting a "definition of minimum common quality criteria for the content, functioning and level of integration" of each of the contact points. The current arrangement of portals makes "it too time consuming and difficult to search for information and complete necessary procedures", according to the REFIT Platform.

4- Lack of awareness and online findability	Users are often unaware of the existence of the various portals and support services. This is largely due to the high level of fragmentation of the services on offer, their many different brand names and the confusion about what can and cannot be expected from each of them.
5- Lack of accessibility for foreign users	A recurring problem due to language barriers, national form fields only accepting national data, acceptance of only national means of identification, need for the foreign user to provide certified and translated copies of original documents as evidence, and offering only national means of payment. A discrepancy in registration fees for domestic and non-domestic businesses was also found (on average, domestic EU businesses spend EUR 1,423 to register their economic activity; while it is on average EUR 2,799 for businesses from another Member State).
6- Lack of overview of Single Market problems	Some contact points collect statistics about problems and queries submitted to them (a yearly overview of such data is published in the Single Market Scoreboard). However, there are many gaps in this overview and the facts and figures collected are often difficult to compare. The lack of evidence and subsequent analysis makes it more difficult for EU policy-makers to reliably identify the most troublesome obstacles hampering the functioning of the Single Market. Because existing surveys and consultations are only a snapshot of the situation, the assessment of evolution of the problems across time is not possible.

Source: SDG impact assessment (2017).

5.3. Problems identified in infringement proceedings

Letters of Formal Notice were sent to all 28 Member States in 2019, 13 years after the adoption of the Services Directive, requesting them to improve their PSCs and address issues related to online availability and quality of information; and raising concerns with access to and completion of procedures online through the PSCs. Consultations with Member States are currently taking place to remedy the shortcomings identified in the LFNs, following which the Commission may proceed with the issuance of reasoned opinions if the issues are not solved within a reasonable amount of time (see also Chapter 7)²⁴.

5.4. Assessment of shortcomings

Many of the shortcomings identified in the past (both in the 2013 study and the 2017 SDG impact assessment) are meant to be addressed by the recent SDG Regulation. While it is somewhat early to see how the SDG Regulation works in practice, once it is fully enforced (and established whether the provisions bring enough clarity for regulators), it seems that the most important weaknesses will be addressed.

There are some issues, however, which we consider still need improvement. These are:

- Further facilitation of online payment methods: while the Single European Payment Area Regulation²⁵ represented a huge step forward for making cross-border payments under the same conditions as domestic payments, these direct benefits for consumers and businesses should be further implemented in the context of the SDG Regulation, through the availability of payment methods for cross-border users;

²⁴ In an interview with officials, the European Commission did not provide further information with regard to the timeframe of the next steps in the infringement proceeding.

²⁵ Regulation (EU) No 260/2012 of the European Parliament and of the Council of 14 March 2012 establishing technical and business requirements for credit transfers and direct debits in euro.

- The eIDAS Regulation, which is the key EU piece of legislation on electronic identification, leaves the acceptance of remote identification methods to the discretion of the Member States, resulting in different requirements throughout the EU. The Commission has recently launched a public consultation in preparation of the revision of the eIDAS Regulation with a view to remedy any remaining shortcomings and further enhance the security and use of electronic identification methods and signatures throughout the EU. This revision provides an opportunity to assess the potential for greater acceptance of eIDs issues in other Member States, including their use through the SDG;
- Practical obstacles related to the submission of electronic evidence in support of an online procedure (e.g. minimum information requirement in a document, format, etc.) may continue to exist and will require close scrutiny by the European Commission as part of its enforcement actions under the SDG;
- Specific indicators for the collection of user feedback and statistics still to be adopted by the European Commission in the form of an implementing act²⁶. It will be important to ensure that such indicators measure not only quantity, but also quality, such as the time required to complete a procedure, common obstacles causing delay or interruption of the procedure, and whether users were provided with the information they were looking for.

²⁶ Articles 24(4) and 25(5) of the SDG Regulation provide a legal basis for the adoption of an implementing act by the European Commission with the method for collecting and exchanging the user statistics and feedback.

6. BEST PRACTICES

KEY FINDINGS

Defining "best practice" is a difficult task as it risks falling into personal and subjective judgements. This chapter provides an example of a good portal ("Your Europe", in terms of providing accessibility for foreign users, performance statistics, good navigation, and taking users into consideration) but warns about being too prescriptive in any recommendations about precise design of portals, if these do not take into account users' experiences.

The chapter also provides alternative solutions which might help to select good examples. This uses indicators developed on the basis of consumer feedback (such as evidence from the Single Market Scoreboard) or using output-based methods more generally (designed to measure and quantify objectives and desired outcomes of interventions).

6.1. Problems with identifying "best practice"

When identifying "best practice" one would need to look for examples which do not suffer from some of the encountered limitations which this study aims to overcome: lack of information; poor quality; unavailable online procedures (especially for non-national users); difficult online findability; low accessibility for foreign users (especially lack of language coverage); and lack of performance statistics (see Chapter 5).

Multiple examples can be provided along these dimensions. Those provided in this chapter should be taken with extreme caution: while they can be used to illustrate some of the ideas to be conveyed (and their potential), at the same time we do not want to suffer from one of the important limitations found in the provision of such services. This is: the fact that contact points are being criticised for being designed taking into account an *administrative* rather than a *user* point of view. Consistent with this, any recommendation should be made carefully so that it does not end up recommending approaches according solely to the logic of the administration, whilst we would welcome those "best practices" which are more neutral in accounting for the regulator's own perception, and which leave it to the users (via their feedback, web analytics on traffic, or following opinions surveys) to determine the processes, paths or designs that are most useful in their own experience.

6.2. Your Europe

Your Europe (<https://europa.eu/youreurope/>) is a web portal offering information to EU citizens and businesses about their basic rights under EU law, and how these rights are implemented in each Member State. Your Europe is an example of cooperation as both EU institutions and national governments provide information content (national governments providing information on national rules implementing the Single Market and also promoting the portal).

In 2019, it had a record 35.7 million visits (48% growth over 2018), and 92% of visitors were satisfied with Your Europe, according to the Single Market Scoreboard.

Your Europe is a good example because it does not suffer from some of the identified problems:²⁷

- **Accessibility by foreign users:** Your Europe has an introductory page which allows language selection;
- **Performance statistics:** Your Europe is capable of generating facts and figures to assess traffic and visits on the different webpages: total visits by country (by businesses and citizens); and relative frequencies (shares) by topic (for citizens this includes: Travel, Work, Vehicles, Consumers, Residence formalities, Health, Family, Education and Youth; for businesses this includes: Taxation, Running a Business, Selling in the EU, Finance and funding, Product requirements, Human resources, Dealing with customers);
- **Navigation:** Your Europe organises its pages according to main topics which makes navigation easy. It has a convenient method of leading the user through a range of menus and interactive questions that channel the user to different pages until reaching the desired final relevant page (this can be a link to the relevant Member State administration); and
- **Users first:** Your Europe claims it is a multilingual portal which "puts user needs first". Your Europe has a "Help us improve" button which allows providing feedback and suggestions for improvement.

6.3. Other examples

As part of its review, the SDG impact assessment (2017) identified good practices which could be used as a model for developing the Single Digital Gateway. The following practices and examples are highlighted:

- **Fully integrated** citizen and business portals (France, the Netherlands, Luxembourg, Cyprus and Malta);
- **Quality criteria** and performance indicators to manage quality of the content of government portals (France);
- **Analyses of user feedback** are used in different ways through: mystery shopping exercises to get feedback and define priorities for further development (Luxembourg); analytics and user feedback to continuously improve the content on its website (the Netherlands); or a short and effective feedback mechanism on each webpage of the portal (Poland); and
- **Sharing best practices:** In the Netherlands the Government set up a central platform for business information where existing portals can work together by providing information, sharing best practices and improving their key performance indicators together. In Denmark the Government provides a service to authorities where they can produce their own digital solutions in an easy way. It requires a very small fee for the operational costs of the engine from each authority. The development is done collaboratively and all authorities benefit from it.

6.4. Using the Single Market Scoreboard (SMS)

As said, we would not want to be prescriptive in the recommendation of one particular "best practice" example. As evaluators or regulators, it is very difficult to come up with a realistic solution that fits the needs of the potential users (businesses or citizens) of the points of contact (especially given the wide

²⁷ In particular, the problems described in Table 3: the lack of accessibility for foreign users, lack of overview of Single Market problems (lack of evidence on usage), lack of online information (websites hard to reach or understand) and lack of quality of information (structured according to the logic of the administration, not users).

range of services and areas being addressed). Attempting to do so risks falling into recommendations which are based on the "logic of the administration" (or of the evaluators, in this case). We are also uncertain on how the format of best portals might evolve in the near future. Although the authors of the current study felt perfectly comfortable with the organisation of some of the portals, we cannot envisage how these are likely to evolve in the near term. Given current developments in the marketplace, it might be possible that the organisation of information in the form of web portals is superseded by others presenting the information using very different and recently developed tools. In just a few years ahead, it might be possible that web portals start to disappear to the benefit of new platforms and ways of presenting information (using LinkedIn, Facebook, YouTube, Instagram, or others), which might be preferred by the younger generations to come. Interactive pages whereby immediate assistance services can be provided (through chats for example, or desk support centres using artificial intelligence technology) might also change completely the idea and provision of "user friendly" services.

However, one thing we can do is to establish some high-level objectives (in terms of time taken to find a certain solution, or of performance that looks at frequencies and numbers of problems solved, for example), and then identify which services are best performers in such objectives. With a ranking of the services' performance, it would be easy to choose a model to follow.

To some extent, this is something that has already been provided by the European Commission. The Single Market Scoreboard (SMS) includes data on the performance of, among others, governance tools providing assistance services for citizens and businesses (such as the PSCs, Your Europe, and SOLVIT)²⁸. It also includes which results have already been obtained, which feedback was received and which conclusions were drawn. The information is provided along the indicators envisaged in the 2015 report on performance of the PSCs against the PSC Charter²⁹ (Table 4).

²⁸ The SMS was first published in November 1997 by the European Commission. To provide of an overview of the Single Market, it has constantly developed and currently provides the performance of Member States in key Single Market policy areas and with regards to trade integration and market openness (the aim is to further expand the areas in the coming years).

²⁹ Capgemini Consulting and Eurochambres (2015). The Performance of the Points of Single Contact.

Table 4: Single Market Scoreboard indicators by tool

Tool	Indicators in the Scoreboard	Tool	Indicators in the Scoreboard
Your Europe Advice	<ol style="list-style-type: none"> 1. Speed of replies (as proxy for efficiency); 2. Quality of replies (proxy for effectiveness); 3. Number of annual enquiries (16 types). 	European Consumer Centres Network (ECC-Net)	<ol style="list-style-type: none"> 1. N. of contacts; 2. N. of complaints; 3. N. of complaints per product or service (11 categories); 4. N. of cases amicably resolved; 5. N. of cases referred to other organisations; 6. N. of cases closed without a solution.
e-Certis	<ol style="list-style-type: none"> 1. N. of criteria in Directive 2014/24/EU entered in the system (7 categories); 2. Evidence recorded in relation to each criterion. 		
EURES	<ol style="list-style-type: none"> 1. Quality of info. on job vacancy exchange; 2. Vacancies posted % held EURES members; 3. Vacancies posted % all national; 4. N. of advisers/10⁶ working age population; 5. People who found a job with the help of a EURES Adviser. 	SOLVIT ³⁰	<ol style="list-style-type: none"> 1. First response time (for home centre); 2. Preparation time (for home centre); 3. Time to accept a solution (for home centre); 4. Time to accept a case (for lead centre); 5. Resolution time (for lead centre); 6. Resolution rate by country (for lead centre).
Your Europe	<ol style="list-style-type: none"> 1. Answers received by the Editorial Board to requests for information Your Europe; 2. Attendance at two Editorial Board meetings during the reporting period; 3. Traffic from government pages and promotional activity requested by the Editorial Board. 	Points of Single Contacts (PSCs)	<ol style="list-style-type: none"> 1. Are procedures offered online? 2. Can procedures be accessed by users from other MS? 3. Is sufficient information online about the procedures? 4. Is the information available in a language understood by people from other countries? 5. Does the PSC collect user feedback and improve its services on that basis? 6. Overall performance.

Source: Single Market Scoreboard.

Therefore, the attractiveness of the SMS is beyond any doubt: based on a range of objective criteria, it highlights which points of contact are best performing along such dimensions. The best performers are therefore accessible to all (including administrative authorities) to view and learn from. "Best practices" to be used as models for other contact points should be selected this way. This suggestion is not new and has been made previously: the rankings from the SMS were used in the SDG impact assessment (2017) to provide examples of best practice and note the progress by some Member States (some of the very good practices are recommended to be used as a model for the development of the Single Digital Gateway). It is intended that user feedback and user statistics from the SDG will feed into the SMS, and will help in better benchmarks and comparison across Member States.

³⁰ SOLVIT cases are handled by two centres: the Home centre prepares the case together with the client, and the Lead centre deals with the authority that took the decision at stake. The home centre is typically the SOLVIT centre in the Member State of which the citizen is a national or where the business is established. The lead centre is the SOLVIT centre in the country where the problem occurred.

6.5. Towards outcomes-based methods

This chapter provides some additional important lessons. Currently, the evaluation of the contact points' performance is carried out focusing only on the legal and technical requirements that such kind of services have to satisfy. This, while relevant, implies that the evaluation aims primarily, if not solely, to understand whether the contact point under analysis actually provides the relevant information and procedural support requested by the law, but completely overlooks more significant aspects such as the perceived effectiveness of the services provided from the end-user's perspective. For example, while it might be relevant for citizens to be provided with information in a language they can understand (when considering activities in another Member State), the mere existence of translated content *might not* be sufficient to satisfy the provision on the non-discriminatory nature of the service. Should this be a simple translation including information only relevant for nationals (in just another language), end-users might still not be able to answer the questions that brought them to the contact point.

Therefore, considering that the main goal of the points of contact is to facilitate European citizens and businesses to exercise their rights within the EU, the methodologies to conduct such evaluations should develop towards more outcomes-based approaches (as some of the reviewed policy documents are beginning to recognise). These would allow to move the focus from the contact points to the users, and thus to fully comprehend the extent to which the contact points have been able to achieve their objectives and deliver the desired outcomes. In this respect, the wealth of methodological tools and approaches from other regulated sectors (in particular public services, such as utilities providing water, electricity or telecommunication services) could be used to learn about output measurement and benchmarking.

7. WEAKNESSES IN THE LEGAL FRAMEWORK

KEY FINDINGS

Our research has listed a range of weaknesses in the legal framework. These are related to: disparity; heterogeneity in the provision; need for more precise guidance; administrative (not user) perspective; no data, no benchmarking, no learning from best practice; lack of enforcement powers; outstanding shortcomings in the legal framework; and need for improved definitions of some concepts.

We have assessed these in relation to the provisions of the SDG Regulation and conclude that: (1) some of the problems might be corrected with the improvements envisaged in the SDG Regulation; (2) the areas where further support or complementary measures might be needed are: indicators for user feedback/statistics; acceptance of cross-border identification methods; online payments; and submission of electronic evidence.

Some of the previous policy documents have identified a number of underlying reasons for the under-performance of contact points. The SDG impact assessment (2017) related these to: isolated approaches (administrations acting "as silos" without inter-linking the multitude of portals); administration-centred designs (design of services from an administration perspective, not that of the user); and neglect of non-national users (requiring national data and certifications).

We accept such reasons but following the findings of our research we have expanded these into the following categories:

- Disparity;
- Heterogeneity in the provision;
- Need for more precise guidance;
- Administrative (not user) perspective;
- No data, no benchmarking, no learning from best practice;
- Lack of enforcement powers;
- Outstanding shortcomings in the legal framework; and
- Need for improved definitions of some concepts.

7.1. Disparity

The first important regulatory problem can be related to the large number and variety of portals. There is disparity across Member States and along the services to be provided (ranging from information on VAT to the process for completing a car registration online)³¹. In a way, this is the result of the success of such instruments: as their services have been increasingly valued, more of such tools have been developing to fulfil other aspects of the Single Market. The consequence, however, is that this has resulted in a large number of directives and regulations governing contact points.

³¹ Recently, BusinessEurope (2020) noted the existing complexity in the regulatory environment. This is illustrated with the range of different contact points set up in various EU regulations, and the fact that "they do not cover all business-related aspects nor information about the entire range of requirements that a company must comply with".

We conclude that: currently the number of contact points available and relevant regulatory instruments is too large. The fragmentation of information and of assistance and problem solving services, however, is recognised in the SDG Regulation. It is expected that the different provisions establishing a Single Digital Gateway as the single entry point will simplify the number of contact points and improve the assistance to citizens and businesses.

7.2. Heterogeneity in the provision

There is a great variation in the requirements applicable to contact points, and this particularly affects the quality of the information being provided and the ease in finding such information. Particular concerns have been raised in relation to non-national users. There are also differences in the practice of quality management and observing users' feedback³².

We conclude that: there is a disparity and heterogeneity in the legal framework on contact points. The provisions have not tended to the harmonisation of the services and instead there is a wide disparity in the type and quality of services being provided. This lack of harmonisation, however, is expected to be corrected with the entry into force of the SDG Regulation, in particular after the introduction of provisions related to cross-border accessibility, harmonised quality requirements and reporting on user feedback and statistics.

7.3. Need for more precise guidance

Given the lack of progress in the requirements of the Services Directive (and the considerable differences between the services provided), the European Commission instituted the PSC Charter³³ with the goal of creating four standard criteria for the measuring and benchmarking of PSCs. These were related to quality and availability of information; trans-actionality of electronic procedures; accessibility for cross-border users; and usability and completion of steps within a reasonable amount of time.

The PSC Charter was a good first approach but suffers from two limitations. Firstly, some of the concepts are difficult to operationalise. For example, the quality and availability of information relates to aspects such as "Degree of information available", "Availability of navigation tools" or "Structure of information" which might have different interpretations depending on the respondent. However, the most important limitation of the PSC Charter is the absence of any legal obligations on implementation. This has meant its application has been below expectations (and, according to the 2017 SDG impact assessment, it is "likely to continue to be uneven and not fully delivering for businesses").

We conclude that: precise guidance has been missing in the directives. Suppliers of contact points have no target against which to measure their performance or objective to achieve. Additionally, the lack of legal obligations has been a weakness (see also further below). It is important to note, however, that the SDG remedies these issues in part: for the contact points mentioned in its Annex, it contains precise guidance in a legally binding instrument with direct effect in the legal order of the Member States. The SDG Regulation will however only fully enter into force from the end of 2020 (for

³² For example, the SDG impact assessment (2017) found differences in the provision of the services (in the Czech Republic, Lithuania, Slovenia, Spain, and the UK different contact points are merged into one single portal). The quality management is also very different (France and the UK use an elaborate set of quality criteria and performance indicators; in Germany and Malta the accuracy of information is reviewed and approved by ministries and competent organisations). User feedback mechanisms are in place in some platforms (either through analysis of user feedback such as in the Netherlands, Poland, Malta, and the UK, or using mystery shopping exercises, in Luxembourg). The easiness to undertake cross-border transactions is also different: in the Netherlands and Lithuania there is a message box integrated in the PSC to provide cross-border users with the opportunity to submit documents online. In Malta and Estonia, online procedures that are available to residents with support of eID can be accessed by foreign users as well.

³³ "Charter for the electronic points of single contact under the services directive" Ref. Ares(2016)226518 - 15/01/2016.

information requirements) and from 2023 onwards (for online procedures), so the effects of this might take some time to materialise. The SDG Regulation also contains provisions which include descriptions such as "user-friendly", "accurate and sufficiently comprehensive", "well-structured and presented", "up-to-date" and "written in clear and plain language" which could be subject to different interpretations (according to the authorities responsible of the provision, or the type of users accessing it). Therefore, more concrete indicators and metrics would be welcome (see further below).

7.4. Administrative (not user) perspective

Different studies have reported that points of contact are designed using an administrative rather than a business perspective: the report by Capgemini and Eurochambres (2015) claims that legal and administrative jargon is used instead of business vocabulary; the SDG impact assessment (2017) asserts that points of contact are still structured according to the logic of the administration.

We conclude that: the directives relating to contact points do not contain provisions which allow learning from the feedback of users. The SDG Regulation, however, envisages providing the gateway with a user-friendly tool to signal and give feedback anonymously on any obstacles encountered by them in exercising their Internal Market rights. It is expected that the online summary overviews of the problems emerging will be published and that this will help overcome problems encountered.

7.5. No data, no benchmarking, no learning from best practice

Following the PSC Charter, there was some form of action which helped highlight best practices and expose some of the Member States' weaknesses. This was done through different benchmarking reports and the Single Market Scoreboard. Although a good first attempt, we note that the data shown in the SMS contains limited information. Moreover, the indicators are not regularly updated, being the most recent "based on the data of 2017 as in-depth comparative reviews to produce this type of data are too resource intensive to repeat on a yearly basis"³⁴.

The lack of data and indicators makes it difficult for policy-makers to assess the progress of some contact points (or to reliably identify where the most significant obstacles are). The *ad hoc* surveys and consultations undertaken from time to time for evaluation purposes provide only a partial picture, as they are often based on results that are not comparable across time.

We conclude that: the lack of indicators against which to measure the progress of contact points is a severe limitation of the current legislation. Without it, it is impossible to measure the progress (and to compare the performance across providers, which would enable to learn from those achieving best results). In this respect, the SDG Regulation is a big improvement, as it requires regular reporting on user feedback and user statistics, all of which should help inform about progress in the provision of points of contact. We note that particular emphasis is put on statistics collected in relation to users' visits (number, origin and type of users of the gateway and user preferences and journeys) which might help in understanding the usage and routes taken by users in their visits. However, although it is also expected that statistics on usability, findability and quality are also collected, it is not clear how this should be done or which dimensions and metrics should be used to make any comparison or benchmark meaningful. The legal framework could improve the measurement of the quality of services by providing the methodology and indicators to be used, and also specifying the need to link these to existing reporting tools, such as the SMS.

³⁴ We note that the information relating to PSCs has disappeared from the SMS portal. The PSCs performance can be found here: https://ec.europa.eu/internal_market/scoreboard/performance_by_governance_tool/points_of_single_contact/index_en.htm.

Finally, the SDG Regulation envisages a gateway coordination group to support the implementation of the regulation. It will facilitate the exchange and regular updating of best practices, discuss improvements to the user-friendly presentation of information and assist the Commission in monitoring compliance. An annual work programme should also help in designing actions to improve the presentation of information, ensure the consistent compliance and facilitate the timely implementation. Activities related to promotion and providing aggregate user statistics and feedback are also part of the programme.

7.6. Lack of enforcement powers

The lack of enforcement powers in relation to contact points has also been reported. The Auditors' report (2016) highlighted that the Commission's reluctance to pursue legal proceedings is due to: the length of the procedure and the lack of confidence in the strength of the legislation. This implies that the Commission had been "only partially effective in ensuring the implementation of the [Services] Directive". The recent Commission Action Plan (2020) also recognises that Single Market rules require that these rules are correctly applied and that breaches are sanctioned (including through the use of infringement procedures, when needed).

The first legal proceedings in relation to PSCs started only in 2015 (in the context of the Services Directive)³⁵.

- **EU Pilots:** Ten EU Pilots were opened in the second half of 2015 for non-compliance with Article 8 of the Services Directive³⁶. However, the absence of a legal basis in the Treaty for any pre-infringement procedure (such as the EU Pilot) resulted in procedural delays;
- **Letters of Formal Notice (LFNs):** On 6 June 2019, 13 years after the adoption of the Services Directive, the Commission sent LFNs to all 28 Member States, requesting them to improve their PSCs and to provide user-friendly one-stopshops for service providers and professionals³⁷. This indicates that the Commission identified shortcomings across all Member States with respect to how they implemented the PSC requirements set out in the Services Directive (SD) and the Professional Qualifications Directive (PQD)³⁸;
- **Reasoned opinions:** No reasoned opinions have thus far been issued in the context of the above-mentioned infringement proceeding. In conversation with Commission officials, we have learned that they are in the process of having consultations with Member State authorities on the basis of the LFNs to remedy the issues identified and will take further action as needed.

³⁵ A large number of infringement proceedings have been started by the Commission to push the implementation of the key instruments for the Internal Market forward over the years. Numerous examples of such initiatives by the Commission can be found, for instance, concerning the Services Directive (SD) and the Professional Qualifications Directive (PQD). In 2015, the Commission acted on identified breaches of Internal Market rules on legal form and shareholdings under the Services Directive, initiating 10 EU Pilot dialogues (see below) and 6 infringement procedures. In 2016, it requested that 9 Member States remove requirements on service provision considered to run counter to the Services Directive. In July 2019, Letters of Formal Notice were sent to Bulgaria and Hungary for failure to comply with the SD. As regards the Professional Qualifications Directive, for example, the Commission issued Reasoned Opinions against 14 Member States in 2016. In 2018, it took action against all Member States except Lithuania for not bringing their legislation in line with the PQD and, in 2019, sent Reasoned Opinions to 24 Member States and Letters of Formal Notice to 2. These illustrate the large amount of obstacles in the fulfilment of the full potential of the Single Market to date.

³⁶ European Court of Auditors (2016). Special Report: Has the Commission ensured effective implementation of the Services Directive?

³⁷ June infringements package: key decisions (2019). Single Market: Commission calls on 28 Member States to comply with EU rules on services.

³⁸ The letters addressed:

- issues with the online availability and quality of information on requirements and procedures relevant for service providers and professionals wanting to exercise their Internal Market rights;
- concerns with access to and completion of procedures online through the PSCs, including for cross-border users.

No clear indication was given regarding the timeframe for next steps, including reasoned opinions; and

- **Court cases:** There are no court cases in relation to contact points³⁹. In part, this can be explained by the very general formulation of the legal provisions establishing the PSCs and other contact points in the legislation. We expect that this issue has now, at least in part, been remedied by the SDG Regulation.

We conclude that: facilitating the enforcement of existing legislation is important for the successful implementation of contact points. The SDG Regulation contains detailed requirements for the operation of the contact points, which are expected to guide the Member States in further improving the functioning of the contact points and to allow the Commission to take action in case Member States do not comply.

7.7. Outstanding shortcomings in the legal framework

A number of remaining shortcomings in the legal framework have been identified. For instance, the lack of harmonised standards for the acceptance of remote identification methods has resulted in an uneven playing field across Member States. Access to administrative services through an eID is currently not possible in all Member States. Also, practical obstacles related to the cross-border payment and the submission of electronic evidence in online procedures are likely to require further implementing measures to be fully eliminated. While the SDG Regulation contains quality requirements for the submission of electronic documents and for the completion of online procedures, including payment, it is expected that the Commission will need to support the Member States in the implementation, in particular, of these SDG requirements⁴⁰.

We conclude that: complementary legislative and implementing measures will be essential for achieving the full potential of the SDG Regulation for the contact points.

7.8. Need for improved definitions of some concepts

The research undertaken for this study has identified a range of terms being used (including "PSCs", "Points of Single Contact", "single points of contact", "points of contact", "contact points", "points of information", "information services", "common platform", "information points", "online services") without clear delimitation of their scope or expectations in what they each should achieve. It is possible that confusion is created by users in the different definitions being used.

We conclude that: although this is something not being picked up by the previous policy documents, definitions on contact points could be clarified.

³⁹ Our research on the webpage of the CJEU (www.curia.europa.eu) identified no case-law related to the PSCs or to Articles 6, 7 and 8 of the Services Directive (the Articles that set out the requirements for the PSCs). Equally, no case-law has thus far been identified for Articles 57, 57a and 57b of the Professional Qualifications Directive, for Articles 9, 10, 11 of Regulation 764/2008 and Regulation (EU) 2019/515 concerning PCPs, for Article 10 of Regulation (EU) No 305/2011 on PCPs for construction, for Article 6 of Directive 2011/24/EU concerning national contact points for cross-border healthcare, or for the European Consumer Centres Network. No case-law was identified on Regulation (EU) 2016/589 of the European Parliament and of the Council of 13 April 2016 on a European network of employment services (EURES), workers' access to mobility services and the further integration of labour markets.

⁴⁰ The Commission noted, during an interview, that regular meetings are organised with the national authorities to support the implementation of the SDG Regulation from a technical point of view. Supporting implementing measures are currently being prepared for the entry into force of the SDG Regulation.

8. CONCLUSIONS AND RECOMMENDATIONS

KEY FINDINGS

The most important problem identified in this study are that to increase the development of contact points, there is a need for more monitoring and enforcement (including penalties when breaches are found). Some other problems are also described, although these are judged as being of a secondary nature (and less important).

On this basis, five recommendations are made. The two main recommendations are: 1) to improve monitoring and 2) to improve enforcement. Both recommendations take into account the provisions recently introduced by the Single Digital Gateway Regulation and three additional recommendations are proposed in terms of: 3) developing complementary legislative and implementing initiatives (harmonising acceptance of remote identification methods and use of electronic identification); 4) presenting clear definitions; and 5) moving to outcomes-based approaches for the evaluation and monitoring of contact points.

In this study, we have reviewed the stream of thinking and analysis of contact points in the EU, together with the existing legislation in this area. We have summarised a wide range of problems identified in different policy documents along the research lines requested by the European Parliament. While all of them put forward interesting aspects, we believe that they rank differently in terms of their importance and relevance. Furthermore, some of the issues identified are beginning to be taken into account in the SDG Regulation.

8.1. Use of indicators for monitoring purposes

Our first important conclusion is that more monitoring of the progress and development of contact points should be undertaken. We have argued that the Single Market Scoreboard (SMS) provides the right framework, but more indicators could be developed. These should take into account a number of principles (some of which were already envisaged in the PSC Charter):

- **Use measurable and objective indicators** (avoid subjective measures; include measures that can be clearly delimited and quantified);
- **Include relevant dimensions** (include objectives of the contact points, in particular: the possibility to complete some of the procedures and formalities online; time needed to do so; and the possibility to obtain other forms of assistance by telephone or email); and
- **Use real-user information** (consider measures based on online feedback forms).

Indicators should also measure clearly the different objectives that contact points aim to achieve. These are: the information role; the process role (speeding up administration) and problem solving (see Chapter 2).

A ranking-based system (with points) or benchmarking could be used and be provided as part of the SMS.

The SDG Regulation already accounts for this possibility. Articles 24, 25 and 26 require the collection of user statistics, the establishment of a user feedback tool on the gateway services, the provision of a user tool to signal obstacles to the exercise of Internal Market rights, and the collection of information from assistance and problem solving services. This framework offers a powerful tool to monitor the implementation of the regulation and hence the services offered by the national contact points.

The European Parliament should take full advantage of these instruments and can encourage the Commission to break the data down when fulfilling its reporting obligation, e.g., per procedure listed in Annex II. This would ensure that, even if user feedback is anonymised, the information provided is sufficiently detailed so that the issues that have arisen can be clearly identified. There is also potential in developing indicators that do not rely only on user feedback and are based on objective measures of performance. These could include: time taken by an external researcher to find certain type of information across pages or easiness of fulfilling a procedure (again using time, but also requirements and associated costs, if any). This should enable the European Parliament to identify any remaining shortcomings in the services provided by the points of contact in a timely manner and to immediately require corrective measures to be taken where needed.

The experience from Your Europe or the Fit for Future Platform (as a way to provide feedback and make suggestions to simplify, reduce burden and increase digitalisation of EU laws) could be used as "best practice". The degree of recurrence of specific issues could be used to prioritise areas of action. Other examples of "best practice" could be selected from the best-performing points of contact (as measured by the SMS).

8.2. Enforcement

Enforcement of Single Market rules requires that measures are correctly applied, and that breaches are sanctioned, where needed. Although much has been said about enforcement (some of the reviewed policy documents are very vocal in using this option), to date, this has been difficult to implement.

Our research for this study has recognised that, while the Commission launched many infringement proceedings in the past years relating to the Single Market legislation, very few were related to points of contact specifically, and none have resulted in a CJEU judgment. This led to variable quality in the provision of services through the points of contact to EU citizens and businesses.

Things might change in the short term as the SDG Regulation provides important new monitoring and enforcement opportunities to the Commission (in particular, its detailed provisions relating to the functioning of contact points). In this context, it is important to note that the requirements set by the SDG Regulation will enter into force at different dates (most provisions will apply from 12 December 2020, whereas a few related to online procedures will only enter into force three years later)⁴¹.

This means that starting from these dates, the Commission will have the power to initiate infringement proceedings in case of non-compliance by Member States. If these do not result in compliance or if different views regarding the necessary implementation measures persist, the Commission may decide to refer the matter to the CJEU. Ultimately, if the Court finds that the Member State has breached EU law and the infringement is not rectified, it can impose financial penalties on the Member State.

The number of infringement procedures against Member States in recent years confirms that ensuring the timely and correct implementation of EU legislation remains a challenge. While the monitoring and enforcement of EU law is a Commission competence, the European Parliament also plays its role in representing the "Union's citizens" and its action has often triggered action from the Commission such as EU Pilot investigations or infringement procedures against Member States which may eventually end up before the CJEU. In 2016, the Commission acted upon more than seven cases based on the European Parliament submissions regarding shortcomings in the way some Member States were implementing certain EU laws (see Ballesteros, 2017).

⁴¹ The obligation to offer the procedures listed in Annex II fully online (Article 6) and the requirements on cross-border access to online procedures (Articles 13, 14(1) to (8) and (10) and 15), will only enter into force 12 December 2023.

The entry into force of the new SDG Regulation therefore provides a key new opportunity for the European Parliament to follow up on the implementation of the new enhanced requirements for contact points, and to encourage any necessary enforcement action by the Commission in relation to the specific quality and accessibility requirements set out in this regulation.

Finally, the SDG Regulation places a number of obligations on the Commission. For instance, it must ensure, alongside the Member States, that quality requirements on information and assistance services are respected. The European Parliament should follow up on the Commission's direct responsibilities under the SDG Regulation and, if necessary, ensure action is taken by the Commission.

8.3. Complementary legislative and implementing initiatives

While we have repeatedly argued that many of the weaknesses relating to the functioning of the contact points are addressed by the SDG Regulation, which will enter fully into force between the end of 2020 and the end of 2023, other complementary legislative initiatives and support measures will be important in ensuring the full operational potential of the contact points. For instance, the Single European Payments Area has been instrumental in facilitating cross-border payments by consumers. The eIDAS can represent a huge step forward in the electronic identification process, enabling citizens to complete online procedures via a card reader from another Member State. However, as mentioned in Chapter 5, these instruments would benefit from further improvements to fully exploit their potential in the framework of the SDG Regulation.

The revision of the eIDAS Regulation provides an important opportunity to the European Parliament to harmonise the acceptance of remote identification methods, thus reinforcing cross-border accessibility. Further implementing measures to support the implementation of the SDG Regulation will be essential, in particular in relation to the acceptance of electronic evidence and the cross-border payment for online procedures.

8.4. Some issues are of a secondary nature

The wide opinion of the policy documents we reviewed considers the legal framework to have important weaknesses due to its fragmented, administration-focused and general nature. The recently adopted SDG Regulation aims at remediating some of the issues identified, such as the lack of quality requirements in legislation establishing contact points. It also focuses on greater user-friendliness.

However, we believe that some of the legal terminology is difficult to measure and may not necessarily lead to better provision of contact points. Improving "awareness", "complexity", "effective signposting" or "appropriate links", "clarity", "accuracy", "user-friendliness", "simplified terminology" are widely-defined concepts, which might also be subjectively interpreted⁴². As it is impractical to devise solutions to improve these concepts in general, an alternative option could be to design indicators that could measure such concepts. These could be defined in terms of user feedback and opinions. The counts or frequencies of responses could be compared across Member States and services. This would allow a measure of benchmark to be achieved (perhaps assessing the number of times feedback forms complain on issues of complexity or inappropriate design of the portal or alternatively, motivating some of the issues by providing prompts or online forms on areas of interest and for which particular feedback might be wanted).

Furthermore, the research undertaken for this study has identified a range of terms being used (including "Points of Single Contact", "single points of contact", "points of contact", "contact points",

⁴² Some of such terms are also part of the SDG Regulation. The use of such terms might generate problems if they are subject to different interpretations.

"points of information", "information services", "common platform", "information points", "online services") to refer indiscriminately to the different information providers. We conclude that this might create additional confusion for those seeking to better understand their scope to exploit them at best.

8.5. Input-based regulatory conception

Finally, we would like to describe a general trend that we have noted which aims at regulating the contact points from an input-based angle. In some of the policy documents, EU institutions are presented as if they should be active participants in the specific design of the portals, scrutinising their features and possibilities. However, we believe that the focus is misplaced: it is not the task of the Commission to think about whether FAQs is the right way to organise websites nor how to reduce the complexity problems. Doing so risks falling again into the criticism of "administrative (not user) perspective" (see chapters 6 and 7).

Instead, the task of the Commission is to ensure that the envisaged outcomes are achieved. Hence, the regulatory thinking should substantially change to regulate based on outputs (using output-benchmarking) where regulating institutions ensure that a certain level of quality outputs is being provided (with independence on how this is done). The SDG Regulation is already an important step in this direction but more needs to be done. Lessons from the regulation of public services (in particular regulation of utilities) could be used⁴³.

8.6. Recommendations

In summary, we have two main recommendations (recommendations 1 and 2), both stemming from the identified problem of lack of incentives in the implementation of the contact points. There are three additional recommendations (3, 4 and 5) that could provide a basis to be developed in the future.

Recommendation 1: improve monitoring.

The following should be considered:

- Taking full advantage of the objective indicators already provided by the SMS;
- Developing new indicators according to the PSC Charter and to the principles established in this study;
- Exploiting Articles 24, 25 and 26 of the SDG Regulation to enhance performance monitoring, including in the implementing act to be adopted by the Commission;
- Proposing objective measures (based for example on the time taken by a researcher to find certain information or complete a certain process); and
- Encouraging the Commission to break the data down when fulfilling its reporting obligation so that comparison and benchmarking can be done.

⁴³ Incentive regulation is designed for improving technical and economic efficiency of public services. Traditionally, regulators have used different methods for benchmarking the costs of regulated firms and for rewarding efficient firms. More recently, benchmark methods use outputs- and outcomes-based approaches for monitoring their performance, as it is believed that this increases their efficiency. Rewards are provided for those firms that are more efficient in the delivery of outcomes (compared to their peers). Penalties are provided for those performing below some industry benchmark.

Recommendation 2: improve enforcement.

The following should be considered:

- Using the Commission's power to initiate infringement proceedings as introduced by the SDG Regulation in case of non-compliance by Member States.

Recommendation 3: complementary legislative and implementing initiatives.

The following should be considered:

- Harmonising acceptance of remote identification methods under the current revision of the eIDAS Regulation and promote the use of electronic identification in the context of the SDG Regulation; and
- Supporting the removal of remaining practical barriers during the implementation of the SDG Regulation, in particular related to the submission of electronic evidence in the context of an online procedure and cross-border payments.

Recommendation 4: present new clear definitions and avoid the use of the same terminology for different concepts.

The following should be considered:

- Clarifying and defining the different instruments and concepts relating to contact points; and
- Providing homogeneity in the concepts and terminology used in different regulations and policy documents.

Recommendation 5: move to outcomes-based approaches for the evaluation and monitoring of contact points.

The following should be considered:

- Progressively abandoning prescriptive approaches about particular designs of contact points (and in particular, portals) and start using outcomes-based approaches;
- Taking into account experiences from broader regulatory practices (for example, regulation of utilities); and
- Encouraging learning from the successful experiences of different Member States.

REFERENCES

- Ballesteros, M. (2017), *Monitoring the implementation of EU law: tools and challenges*, Publication for the committee on Petitions, Policy Department for Citizens' Rights and Constitutional Affairs, European Parliament, Luxembourg, available at: [https://www.europarl.europa.eu/RegData/etudes/STUD/2017/596799/IPOL_STU\(2017\)596799_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2017/596799/IPOL_STU(2017)596799_EN.pdf).
- BusinessEurope (2020), *"Examples of Single Market barriers for businesses - Points of single contact"*, 07/09/2020, available at: https://www.buinessurope.eu/sites/buseur/files/media/facts_and_figures/2020-09_sm_barriers_-_points_of_single_contact.pdf.
- Capgemini and Eurochambres (2015), Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (European Commission), *The performance of the points of single contact*, available at: <https://op.europa.eu/en/publication-detail/-/publication/c6af2712-8423-4c50-be26-faa4d099ce8b>.
- Charter for the electronic points of single contact under the services directive (2013), available at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewiRtl665MLqAhVIR0EAHSXCAXIQFjAAegQIBRAB&url=http%3A%2F%2Fec.europa.eu%2FDocsRoom%2Fdocuments%2F14950%2Fattachments%2F1%2Ftranslations%2Fen%2Frenditions%2Fnative&usq=AOvVaw0K03RZ_WV6CbStWHiaNM7M.
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Better Governance of the Single Market. COM/2012/259 Final, available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2012:0259:FIN:EN:PDF>.
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on A Digital Single Market Strategy for Europe. COM/2015/192 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2015%3A192%3AFIN>.
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on EU e-Government Action Plan 2016-2020 - Accelerating the digital transformation of government. COM/2016/0179 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52016DC0179>.
- Communication from the Commission on EU law: Better results through better application. C/2016/8600, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52017XC0119%2801%29>.
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Long term action plan for better implementation and enforcement of single market rules. COM/2020/94 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2020:94:FIN>.
- Court of Justice of the European Union (2020). *Annual Report 2019 Judicial Activity*, available at: <https://curia.europa.eu/jcms/upload/docs/application/pdf/2020-05/qd-ap-20-001-en-n.pdf>.

- Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32005L0036>.
- Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0123>.
- Directive 2011/24/EU of the European Parliament and of the Council of 9 March 2011 on the application of patients' rights in cross-border healthcare, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011L0024>.
- Duke, C. et al., *A European Single Point of Contact*, Publication for the committee on Internal Market and Consumer Protection, Policy Department for Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg, 2013, available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/507453/IPOL-IMCO_ET\(2013\)507453_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/507453/IPOL-IMCO_ET(2013)507453_EN.pdf)
- Duke, C., *Single Digital Gateway: how EU could meet expectations of citizens and businesses?* Publication for the committee on Internal Market and Consumer Protection, Policy Department for Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg, 2018, available at: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2018/614219/IPOL_BRI\(2018\)614219_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2018/614219/IPOL_BRI(2018)614219_EN.pdf).
- European Commission press corner on EU law, available at: <https://ec.europa.eu/commission/presscorner/home/en>.
- European Commission's website. Single Market Scoreboard page, available at: https://ec.europa.eu/internal_market/scoreboard/.
- European Commission (1997), *First Single Market Scoreboard highlights strengths and weaknesses*, available at: https://ec.europa.eu/commission/presscorner/detail/en/IP_97_1017.
- European Commission (2015), *Better Regulation Toolbox complementing the Better Regulation Guideline presented in SWD(2015) 111*, available at: https://ec.europa.eu/info/sites/info/files/better-regulation-toolbox-2015_0.pdf.
- European Commission (2017), *COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT Accompanying the document Proposal for a regulation of the European parliament and of the Council on establishing a single digital gateway to provide information, procedures, assistance and problem solving services and amending Regulation (EU) No 1024/2012*. SWD(2017) 213 final. PART 1/3, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52017SC0213>.
- European Court of Auditors (2016), *Special Report: Has the Commission ensured effective implementation of the Services Directive?*, available at: https://www.eca.europa.eu/Lists/ECADocuments/SR16_05/SR_SERVICES_EN.pdf.
- European Parliament (2010), *Report on delivering a single market to consumers and citizens*. 2010/2011(INI), available at: <https://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&language=EN&reference=A7-0132/2010>.

- European Parliament (2010), *Report on Governance and Partnership in the Single Market*. 2010/2289(INI), available at: <https://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A7-2011-0083&language=EN>.
- European Parliament, Committee on the Internal Market and Consumer Protection (2020), *DRAFT REPORT on strengthening the single market: the future of free movement of services*. 2020/2020(INI), available at: https://www.europarl.europa.eu/doceo/document/IMCO-PR-646943_EN.pdf.
- European Parliament resolution of 9 March 2010 on SOLVIT. 2009/2138(INI), available at: <https://op.europa.eu/en/publication-detail/-/publication/be0b7b79-a54c-4569-bda1-10bb81ed97f6/language-en>.
- Fit for Future Platform website, available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say-simplify>.
- June infringements package: key decisions (2019), *Single Market: Commission calls on 28 Member States to comply with EU rules on services*, available at: https://ec.europa.eu/commission/presscorner/detail/en/MEMO_19_2772.
- List of judgments of the Court of Justice concerning professional recognition, available at: <http://ec.europa.eu/DocsRoom/documents/15431/attachments/1/translations>.
- Proposal for a Regulation of the European Parliament and of the Council on establishing a single digital gateway to provide information, procedures, assistance and problem solving services and amending Regulation (EU) No 1024/2012. COM(2017)256 final - 2017/086 (COD), available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52017PC0256>.
- Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem solving services and amending Regulation (EU) No 1024/2012, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.295.01.0001.01.ENG.
- Regulation (EU) 2019/515 of the European Parliament and of the Council of 19 March 2019 on the mutual recognition of goods lawfully marketed in another Member State and repealing Regulation (EC) No 764/2008, available at: <https://eur-lex.europa.eu/eli/reg/2019/515/oj>.
- Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011R0305>.

This study analyses the role and development of Points of Single Contact and other information services. It reviews recent policy documents, and identifies a range of weaknesses for the provision of contact points. The main recommendations are to improve monitoring (using the indicators and the Single Market Scoreboard) and make use of infringement proceedings in case of non-compliance. The actions could build on the instruments available under the recent Single Digital Gateway Regulation.

This document was provided by the Policy Department for Economic, Scientific and Quality of Life Policies at the request of the committee on Internal Market and Consumer Protection (IMCO).

PE 658.179
IP/A/IMCO/2019-09

Print ISBN 978-92-846-7204-2 | doi:10.2861/63872 | QA-01-20-576-EN-C
PDF ISBN 978-92-846-7203-5 | doi:10.2861/69896 | QA-01-20-576-EN-N