



**The voice of blind and partially sighted people in Europe**

## **Response to Public Consultation on the Revision of the European Interoperability Framework**

June 2016

### **Foreword regarding the accessibility of online consultations**

We urge the European Commission (EC) to note that the HTML 'EUsurvey' platform used for the present consultation is **not** fully accessible for blind and partially sighted people or other disabled people who use keyboards but can't use a mouse.

HTML content can - and should – be made accessible to all. Provision of “alternative” formats is not the answer.

We have raised these concerns, repeatedly, for a number of years<sup>1</sup> - to no avail. The EC urgently needs to audit its online tools and channels of communication, especially those designed to engage with citizens. The EC should ensure an appropriate level of accessibility by using European Standard EN301549 when procuring digital goods and services.

## **1. Registration**

The **European Blind Union (EBU)** is a non-governmental, non profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind people and people with low vision in Europe. It currently operates within a network of 44 national members including organisations from 27

---

<sup>1</sup> See the overview of the European Commission's websites we commissioned in 2014 for more information [http://www.euroblind.org/media/ebu-blind-date/Access-Denied-Annex-I\\_-\\_European-Commission-Overview.doc](http://www.euroblind.org/media/ebu-blind-date/Access-Denied-Annex-I_-_European-Commission-Overview.doc)

European Union member states, candidate nations and other major countries in geographical Europe.

**Our Interest Representative Register ID is 42378755934-87**

## 2. Publication consent

**We are happy for our contribution to be made public.**

## 3. Assess the need of revising the EIS and EIF

### 3.1. Assessment of needs and problems of interoperability

---

**Q1. Please select up to 10 major problems that you identify as obstructing the implementation of interoperability at national level.\***

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

**Q2. Please select up to 10 major problems you identify as obstructing the implementation of cross-border interoperability.\***

- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF (adopted in 2010)

since they were adopted before the ones at EU level.

- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF, since the latter do not always capture the needs of Member States' public administrations.
- There is a lack of resources available for implementing cross-border interoperability in Member States.
- Cross-border interoperability is not a priority in the political agenda of Member States.
- There is a lack of a consolidated view on all the existing cross-border interoperability initiatives in Member States.
- The IT budget of Member States is largely affected by the maintenance of legacy systems.
- Cross-border interoperability is not perceived as a worthwhile investment in Member States.
- European Structural and Investment Funds (ESIF) that could be used to implement cross-border interoperability are not well leveraged by Member States.
- There is a shortage of skills to implement cross-border interoperability-related policies and initiatives in Member States.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Cross-border digital public services available in Member States are not (although it is needed) sufficiently multilingual.
- There is a limited demand from citizens, businesses and/or administrations for digital cross-border public services (e.g. cross-border mobility is low).
- Existing cross-border digital public services available in Member States are not sufficiently known by citizens, businesses and/or public administrations (lack of awareness).
- National portals tend to be fragmented.
- National portals are not sufficiently integrated with EU portals.
- Technological evolution in Member States is largely affected by the maintenance of legacy systems.
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in.
- There is a lack of interoperability standards or Member States are using different standards
- Interoperability standards, even when available, are not widely used
- Other
- Don't know/ No opinion

**[If 'Other' is ticked] Please describe the other problems identified as obstructing the implementation of cross-border interoperability in EU countries.**

There is significant fragmentation across the EU in terms of the level of digital accessibility that is required at national level – some countries have legal requirements in this area and some don't. Ensuring that accessibility is a core criterion in implementation of national and cross-border interoperability is essential for the 30 million blind and partially sighted citizens who access online government systems.

**Q3. In your view, what are the main problems, if any, faced by businesses when using digital public services provided by European public administrations, at national or cross-border levels?\***

- Not all digital public services are exposed for use by the IT systems of businesses, so manual work is still needed

- Different digital public services, exposed for use by the IT systems of businesses, are using different standards (lack of a common approach for standards and specifications at national level)
- There is no one single portal through which businesses can access all digital public services.
- The public services are not all fully digitised. Businesses have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- Published information is not complete, not concise enough, outdated or irrelevant
- Businesses face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Information is not sufficiently translated in the language of businesses' interest
- Businesses have to submit, although electronically, the same data many times when using different digital services
- Businesses have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know/No opinion

**[If 'Other' is ticked] Please describe the other problems faced by businesses when using digital public services nationally or cross-border.**

Blind and partially sighted people come across inaccessible digital public services every day (websites, apps, self-service kiosks) - if they run businesses they come across the same issues.

**Q4. In your view, what are the main problems, if any, faced by citizens when using digital public services provided by European public administrations, at national or cross-border levels?\***

- There is no one single portal through which citizens can access all digital public services.
- The public services are not all fully digitised. Citizens have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence
- Citizens have no trust that transactions and personal data will be secured
- Citizens face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Published information is not complete, not concise enough, outdated or irrelevant
- Citizens do not get enough support while using digital public services
- Citizens have to submit, although electronically, their personal data many times when using different digital services
- Citizens have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know/No opinion

[If 'Other' is ticked] Please describe the other problems faced by citizens when using digital public services nationally or cross-border.\*

Blind and partially sighted citizens have the same concerns around trust and data privacy as other citizens but they also face unnecessary accessibility and usability issues because public administrations do not currently implement well recognised web accessibility standards (EN 301549). There is an urgent need to ensure end-to-end accessibility of online interactions. Sometimes it is not possible for blind and partially sighted people to authenticate themselves because the interface is inaccessible. At other times a payment system will be inaccessible, too. Therefore we need better interoperability standards as well as the swift adoption and implementation of the EU Directive on the accessibility of the websites and mobile applications of public sector bodies.

## 4. Assess the impact of the EIS/EIF revision

### 4.1. Assessment of the revision of the EIS

**Q5. Do you agree that the vision for a revised EIS should be that "By 2020, citizens and businesses should benefit from interoperable user-centric digital public services, at national and EU levels, in support to the free movement of goods, persons and services throughout the Union"? \***

Yes

**Q6. Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate at national level in spite of the potential complexity of implementing any individual one.\***

| Actions  | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. Define and implement a governance structure to enable interoperability of digital public services at national level   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable end-to-end public services  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Ensure users' involvement in the design of national public services   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Actions  | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 8. Promote the use of interoperable solutions including those produced by EC programmes in particular by ISA/ISA <sup>2</sup> (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.))  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 10. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. Support activities related to security and data protection issues of public services   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 12. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. Support activities ensuring that the "digital" dimension is considered when preparing national legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision-making and the national legislative process                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. Align with and promote the use of the European Interoperability Reference Architecture (EIRA)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 15. Enrich and reuse solutions contained in the European Interoperability Cartography (EICart)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 16. Ensure that data is transferrable between public services without restrictions, with respect to data protection and security rules   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q7. Are there any additional important action(s) that could better support interoperability at national level?\***

Yes

[If 'Yes' is ticked] Please further detail the proposed additional action(s).\*

It is essential to ensure that accessibility is a mandatory criterion when developing interoperability between public services, citizens and businesses.

**Q8. Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate in the context of cross-border interoperability between EU countries in spite of the potential complexity of implementing any individual one.\***

| Actions  | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. Define and promote governance structure/s for the interoperable management of digital public services at European level                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Identify, liaise and share governance practices with relevant policies and their governance structures at EU or national level                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Actions  | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable European public services  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Ensure users' involvement in the design of European public services   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 8. Prepare a communication strategy and have it implemented  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 10. Promote the use of interoperable solutions, including those produced by EC programmes in particular by ISA/ISA <sup>2</sup> (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. Support activities related to the development and operation of Trans European Systems supporting EU policies, including their underlying network infrastructure  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 12. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. Support activities related to the description, organisation and availability of catalogues of European and national public services  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 15. Support activities related to security and data protection issues of public services   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 16. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 17. Support activities ensuring that the "digital" dimension is considered when preparing EU legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision and law making   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 18. Align with and promote the European Interoperability Reference Architecture (EIRA)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 19. Put in place and operate the European Interoperability Cartography (EICart) and feed it with reusable and interoperable solutions from the EC, the Member States' administrations and other sources  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 20. Ensure that data is transferrable between the European public services without restrictions , with respect to data protection and security rules   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Q9. Are there any additional important action(s) that could better support interoperability at European level?\***

Yes

[If 'Yes' is ticked] Please further detail the proposed additional action(s).\*

Ensure that the requirement for accessibility is mainstreamed in all interoperability policy and legislative developments so that disabled citizens, including blind and partially sighted citizens can benefit from interoperability.

## 4.2. Assessment of the revision of the EIF

**Q10. Please select up to 10 areas in which you expect the EIF to contribute the most with regard to the implementation of interoperability in the different Member States as well as in Europe in general. \***

- Cost savings
- Time savings
- Increased revenue
- Reduced operational costs
- Software vendor lock-in avoidance
- Support innovation
- Support employment
- Facilitate reuse, sharing and adoption of future solutions
- Increase transparency
- Increase growth and competitiveness
- Protection of fundamental rights
- Reduced CO<sub>2</sub> emissions
- Better decision making
- Advance public and private policy goals
- Higher satisfaction levels in services for the direct beneficiaries of interoperability solutions
- Improved compliance for organisations implementing, operating and maintaining interoperability solutions
- Better data quality
- Better data availability
- Improved security
- Other
- Don't know/ No opinion

**Q11. Please indicate the level of importance of the following recommendations with regard to the benefits they may generate in the different Member States in spite of the potential complexity of implementing any individual one. \***

| Recommendations                        | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. Data transferability                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. User involvement                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Once-only submission of information | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Administrative simplification       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Effectiveness and efficiency        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

For this purpose, the EIF proposes a **Conceptual Model** the components of which, and corresponding recommendations, are presented below.



| Recommendations                | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion             |
|--------------------------------|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 6. <b>Base Registries</b>      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 7. <b>Open data</b>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 8. <b>Service Catalogues</b>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 9. <b>Security and privacy</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

The EIF proposes a **layered interoperability model** and recommends that public administrations should ensure proper “Interoperability governance” of their interoperability activities, also through alignment with the European Interoperability Framework and continuous monitoring.

Recommendations stemming from the proposed model are listed below.

| Recommendations  | Not at all important     | Rather not important     | Neither important nor unimportant | Rather important         | Very important                      | Don't know / No opinion  |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|-------------------------------------|--------------------------|
| 10. <b>Standards and specifications</b>                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. <b>Open specifications</b>                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 12. <b>Interoperability and public services governance</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. <b>Legal interoperability</b>                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. <b>Organisational interoperability</b>                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 15. <b>Information interoperability</b>                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 16. <b>Technical interoperability</b>                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Different impacts may result from the implementation of the aforementioned actions. These impacts can be positive (also referred to as "benefits" in the remainder of this questionnaire) or negative (also referred to as "costs" in the remainder of this questionnaire) and can be grouped into the following three categories::

- **Economic impacts**: changes in costs (compliance cost, increased revenue, reduced operational cost, etc.), changes in time needed to perform an activity (that could often be translated in economic impact), administrative burdens to businesses and citizens, impact on the potential for innovation, competitiveness, technological development, etc.
- **Social impacts**: impacts on fundamental/human rights, changes in employment levels or job quality, social inclusion, impacts on health, security (including crime and terrorism), education, accessibility to and quality of public services, citizens' participation in decision-making, etc.
- **Environmental impacts**: positive and negative impacts associated with the changing status of the environment such as climate change, air, water and soil pollution, etc.

**Q12. Please indicate, if any, the expected types of benefits resulting from the implementation of the following recommendations. \***

| Recommendations                                     | Economic (for businesses and/or citizens) | Economic (for public administrations) | Social                              | Environmental            | Other                    | None                     | Don't know / No opinion             |
|---|---|---------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 1. Data transferability                             | <input type="checkbox"/>                  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 2. User involvement                                 | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 3. Once-only submission of information              | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 4. Administrative simplification                    | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 5. Effectiveness and efficiency                     | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 6. Base Registries                                  | <input type="checkbox"/>                  | <input type="checkbox"/>              | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7. Open data  | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 8. Service Catalogues                               | <input type="checkbox"/>                  | <input type="checkbox"/>              | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 9. Security and privacy                             | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 10. Standards and specifications                    | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 11. Open specifications                             | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 12. Interoperability and public services governance | <input type="checkbox"/>                  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 13. Legal interoperability                          | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 14. Organisational interoperability                 | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 15. Information interoperability                    | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 16. Technical interoperability                      | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

**Q13. In your opinion, would you say that businesses will also benefit from the EIF revision?**

Yes

**Q14. In your opinion, would you say that citizens will also benefit from the EIF revision?**

Yes

**Q15. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for citizens? \***

Agree

Please feel free to comment on your answer.

It is currently very difficult for blind and partially sighted people to navigate a range of online systems that are not interoperable and with varying degrees of accessibility. A high level of interoperability, coupled with a high level of accessibility would make a major difference in the lives of 30 million blind and partially sighted citizens

**Q16. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for businesses? \***

Agree

Please feel free to comment on your answer.

Better interoperability will create a level-playing field for businesses and a larger potential customer base.

**Q17. Please select up to 10 recommendations that should have the highest priority to be implemented within Member States' public administrations in order to better achieve interoperability during the 2017-2020 period.\***

- Solutions and data reusability
- Openness and Transparency
- Technological neutrality and data transferability
- User centricity (user involvement, once only submission of information...)
- Inclusion and accessibility
- Security and privacy
- Multilingualism
- Once-only submission of information
- Administrative simplification
- Preservation of information
- Effectiveness and efficiency
- Base Registries
- Open data
- Service Catalogues
- Standards and specifications
- Interoperability governance
- Public service governance
- Legal interoperability
- Organisational interoperability
- Information interoperability
- Technical interoperability
- Don't know/ No opinion

**Q18. As mentioned at the beginning of this consultation, please feel free to express any further comment that you may have on the draft revised EIF text.**

Access to digital products and services is of paramount importance to people with sight loss. With technology evolving apace and an increasing number of platforms to access products and services, there is an urgent need to ensure interoperability and accessibility of these products and services for all users, otherwise the 'digital divide'

will only continue to increase. We agree that a review is necessary to ensure that policy and practice remain relevant to emerging technological trends (cloud computing, big and open data, etc.).

We believe that, in the area of public sector information – and as stipulated in Directive 2013/37/EU - public sector bodies should make documents available through open and machine-readable formats, together with their metadata in a format that ensures interoperability, re-use and accessibility. We believe that accessibility for all should be incorporated into the development of strategies relating to the interoperability of public services across the Union.

The programme on interoperability solutions and common frameworks for European public administrations, businesses and citizens should comply with the general principle of ‘inclusion and accessibility’.

Inclusion and accessibility should be part of the development lifecycle of any European public service in terms of design, information content and delivery. In this context it is important to stress that accessibility is now a mandatory criterion for technical specifications in public tenders, as stated in article 42 of Directive 2014/24/EU and European Standard EN 301 549 on Accessibility requirements for public procurement of ICT products and services in Europe is now in place ( see [http://www.etsi.org/deliver/etsi\\_en/301500\\_301599/301549/01.00.00\\_20/en\\_301549v010000c.pdf](http://www.etsi.org/deliver/etsi_en/301500_301599/301549/01.00.00_20/en_301549v010000c.pdf) )

People access online public services in different ways and increasingly on mobile devices. Many people own a desktop/laptop and at least one mobile device and may have products with differing operating systems which will need to synchronise data – there are interoperability problems with this too. In addition, it would be helpful to think about interoperability in order to ensure that mobile devices are able to link to kiosks and other digital devices where public and/or commercial services are provided, as this would also benefit users. Issues in relation to electronic payments are also of concern as this is an area where standardisation is currently lacking.

Many services can now be accessed through mobile or web-based apps. In this context and in the context of online services more generally, interoperability is essential for seamless delivery – in particular, the web has to be an interoperable platform across devices.

The main issue around web interoperability is one of conformance; current W3C standards are defined more tightly than early generations, but there are still implementation differences amongst those using the standards, which is what causes most of the interoperability issues. Therefore we look forward to the swift adoption and implementation of the EU Directive on the accessibility of the websites and mobile applications of public sector bodies

## 5. Subsidiarity

The Impact Assessment also verifies whether EU action in areas beyond its exclusive competence is compatible with the principle of subsidiarity. As defined in Article 5(3) of the Treaty on European Union, the Union should intervene only if it is able to act more effectively than EU countries at their national or local levels.

**Q19. Do you agree that, with regard to the revisions of the EIS and the EIF, action at EU level provides clear added value compared to action taken at Member State level?\***

Yes

[If 'Yes' is ticked] Please explain the main differentiating benefit of an EU action compared to an action taken at Member States level.\*

EU level action ensures that the same rules apply across 28 member states – this creates a level playing field for citizens and businesses; it fosters innovation and ultimately delivers better solutions for all EU citizens.

\*\*\*

For further information or clarification on this consultation response, please contact Carine Marzin [carine.marzin@rnib.org.uk](mailto:carine.marzin@rnib.org.uk) or get in touch with the EBU office.

European Blind Union Office : 6 rue Gager-Gabillot 75015 Paris, France

Tel : +33 1 47 05 38 20 - E-mail: [ebu@euroblind.org](mailto:ebu@euroblind.org)

Follow us on Twitter: [@euroblind](https://twitter.com/euroblind)