

European Commission
DG Internal Market, Industry, Entrepreneurship and SMEs
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Response to the Consultation on the Single Digital Gateway

The Confederation of Swedish Enterprise is Sweden's largest business federation representing 50 sector organisations and 60 000 member companies with over 1.6 million employees.

The Confederation of Swedish Enterprise (henceforth Swedish Enterprise) finds that the questionnaire provided for the consultation on the Single Digital Gateway is difficult for a business representative organisation to respond to. Swedish Enterprise has, therefore, chosen to respond to the consultation and express our support for the Single Digital Gateway initiative with this paper instead.

Swedish Enterprise represents many businesses that already engage in, or could engage in, cross-border trade within the EU, and for these, it is especially important that remaining barriers to trade and free movement in the Single Market are removed. Swedish Enterprise thus supports the European Commission's efforts to revive and modernise the Single Market and to enhance its function, as expressed for example in the Single Market Strategy (COM (2015) 550 final).

Generally, lack of access to information about the laws and rules that apply in the Single Market and in different Member States, prevents companies from making use of all the opportunities that the Single Market offers. We, therefore, welcome the Commission's ambition to create a Single Digital Gateway (SDG).

With an increase in the number of contact points, and several different contact points containing information relevant to a specific company's operations, it is important to link these contact points together. A central hub for the various contact points such as the SDG would be a great improvement and help for companies looking for information on how to do business cross border.

The SDG could be a 'one-way-in' for companies seeking information about what rules apply in which Member States and wanting to manage administration related to establishment or cross-border trade of both services and goods that the services passport is meant to be for the construction and business services sectors. The added benefit of putting resources into creating the SDG would, of course, be that it would be built on and improve systems that are already partly in place and it is a system open to all businesses in all sectors that see the potential of doing business in the Single Market.

The success of the new gateway will, however, depend on the information and functions available through it being continuously updated with the latest Member State information so that it represents a relevant portal of the Single Market. Member States should already be providing relevant information through a variety of contact point/information points. It is well-known that in many cases the quality of the information leaves much to be desired due to a variety of reasons, one of which is lack of resources at Member State level. One important aspect of the work to establish the SDG, apart from its design, will thus be to consider what resources will be made available to Member States to provide the information upon which the SDG will be built.

For example, Points of Single Contacts, as required by the Services Directive, have not yet been fully established in all Member States. Many existing PSCs do not contain all the information as provided for in the Services Directive regarding the rules, laws, and procedures that apply to service providers and their capability to process administrative formalities.

Swedish Enterprise has also previously argued that PSCs should be expanded to also include information regarding trade with goods. Swedish Enterprise also agrees with the 2013 Charter for the Electronic Points of Single Contact under the Services Directive that to meet the needs of businesses, the PSCs should not only meet the obligations of the Services Directive but go beyond them, in terms of scope and functionality. If these points of contact are to become part of the new gateway, this work to update and transform them must be continued.

The new Gateway should provide companies with all the information and assistance they need to operate in the Single Market including the possibility to complete administrative procedures entirely online.


The SDG should be designed with efficiency in mind so that it is easy for all sized businesses to use. It should be ambitious enough to be more than just an information page but actually assist businesses that are willing to operate across borders. This includes providing valid and reliable contact points for follow-up enquires; including the date and time of when these services are available. All current information should be accessible in the national language or languages, and importantly, in a more internationally spread language, such as English. It is also important that the information provided must maintain the same quality regardless of language.

Swedish enterprise is a member of BusinessEurope. We agree with the more detailed points regarding the SDG submitted by BusinessEurope in a letter addressed directly to Commissioner Bieńkowska.

Swedish Enterprise will be pleased to assist the Commission in the development of the Single Digital Gateway in any way we can as the details of this initiative become clearer.



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