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The Single Digital Gateway Regulation: Lessons from Implementation in Five EU Countries

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Foreword

As more citizens become accustomed to using digital administrative services, the next phase of digital administration is already emerging with the implementation of the Single Digital Gateway Regulation (SDGR). This regulation aims to make administrative services that are particularly important for the internal market fully digital and accessible across borders. Just as digital toll stickers for motorways have become standard, the goal is to make cross-border activities – such as studying, working and doing business – digital, and thus easier and more convenient.

In view of the considerable need for improvement in the area of digital government, which is highlighted annually by the Digital Economy and Society Index (DESI) and the European e-Government Benchmark, the likelihood of Germany meeting the deadlines for the implementation of the SDGR seemed low. Despite differences in technical requirements and legal frameworks among EU Member States, one major commonality emerged: none of them managed to fully implement the SDGR by the end of 2023.

This EU-wide delay can largely be attributed to common challenges faced by the implementers, including the complex interpretation of the regulation, difficult communication with the implementing bodies, management of the SDGR within other national digitalisation projects, and generally limited resources.

Even as these challenges are being addressed, new projects are already underway to further advance the goals of the SDGR, such as the Personal Digital Wallet for Citizens (EUDI Wallet) based on the amendment to the eIDAS Regulation (eIDAS 2.0) ((EU) 2024/1183). This brings similar issues into view, making it especially worthwhile to look back and learn from previous experiences.

To this purpose, this White Paper takes a pragmatic approach and examines what can be done now at an organisational level to not only fulfil the SDGR but also related future projects in Germany using efficient and accessible solutions. Drawing on interviews with experts from various administrative levels in

Germany and selected EU Member States, concrete recommended actions were developed. These focus primarily on overarching organisational challenges during the implementation to date, in areas such as governance structures, monitoring, work methods and collaboration. The aim is to apply these insights to future projects effectively. The primary audience includes implementers and decision-makers at different administrative levels. Although the focus is on Germany, noteworthy examples from other countries are also highlighted.

We would like to take this opportunity to thank our interview partners and hope this paper provides useful insights.

Competence Center Public IT

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Highlights

The cross-border provision of administrative services to strengthen the European internal market remains a central goal of EU-wide digitalisation efforts. The implementation of the Single Digital Gateway Regulation will therefore continue, despite the expiry of the deadlines. This White Paper provides an initial review of the implementation of the SDGR, identifying in particular organisational challenges that have arisen not only in Germany but also in four other EU countries (Austria, Ireland, Spain and Sweden), and derives insights that can inform future projects and initiatives. A key finding is that implementers across the Member States faced similar challenges, despite differing framework conditions and requirements. Key challenges included the extensive effort required to interpret the regulation, the secondary priority that it has long been given, difficult communication with implementing actors, and, in some cases, a lack of acceptance. Complex management within pre-existing national projects and limited knowledge about the actual progress of implementation over time have further complicated SDGR implementation. Based on the interview results, recommended actions were developed that can help to shape solutions for these problems and are presented in more detail in Chapter 5. Given the constraints of legal and political framework conditions, as well as limited resources and (technological) path dependencies for all actors involved, these recommendations focus primarily on organisational factors and can also help to facilitate the implementation of future projects.

Provide targeted support: Tailor assistance to the target group and proactively offer support services

The SDGR's complexity and comprehensive interpretation requirements, combined with its integration into national projects, created a strong necessity for advice and support. In Germany, the federal states and municipalities, which vary widely in their requirements, framework conditions and capacities, are often dependent on support. In the context of the SDGR, however, the provision of information and support services was sometimes delayed and not always aligned with specific needs. Going forward, a more cohesive approach to information

management, knowledge sharing and participation could be beneficial (from the outset). This would involve not only developing information resources, training materials and support tools tailored to the target group, but also adapting and providing these resources through a well-planned distribution strategy. Advisory services and contact points should not only be made available on request. Rather, an active advisory structure should be established that enables continuous feedback and gauges the needs and sentiments of implementing actors (see p. 20).

Communicate proactively: Increase relevance by emphasising benefits and fostering dialogue

During the implementation of the SDGR, the potential benefits and successes of the regulation were often not clear to the implementing actors, raising the risk that it would be permanently viewed as an additional burden and accordingly given a low priority. In order to avoid the negative effects of this, such as a delay in the overall project, strategic and proactive communication can be used as a targeted tool. A well-planned, benefit-focused communication strategy highlights the advantages, added value and potential positive secondary effects for implementers, while clarifying areas of overlap with other projects. Moreover, a communication strategy that is focused on creating dialogue and trust must be based on transparent reporting. Only in this way can expectations and goals be regularly and systematically aligned, which in turn lays the foundation for addressing the issues and concerns of affected stakeholders. Finally, it is essential to showcase successful implementation practices and make them easy to find (see p. 22).

Focus on data-based management: Lay the foundation for evidence-based decisions with robust monitoring

The implementation of a comprehensive EU regulation such as the SDGR adds new demands to existing digitalisation projects, creating additional dependencies and requiring the reallocation of resources. This makes targeted management more difficult, as these interdependencies impede a focus on the goals of

individual projects. This can make it challenging for decision-makers and implementers to make strategic decisions regarding individual projects. A lack of data on the actual implementation status at various levels, as was partly the case with the SDGR, further hinders targeted governance. It is therefore crucial to carry out comprehensive and transparent monitoring from an early stage in order to quickly identify and respond to problems. To this end, recording the implementation status in as much detail and as widely as possible is key. Systematically involving federal states and municipalities in this process is especially important for gathering feedback from these implementation levels (see p. 24).

Share knowledge and resources more effectively: Give higher priority to international cooperation

All actors implementing the SDGR face limited resources and capacities. Given the complex starting conditions and high demands within each national context, cross-border cooperation on the SDGR was often given low priority. While there were some successful pilot projects and cooperative efforts within the EU, many opportunities for exchange and networking across borders were underutilised. Interviewees pointed to differences in established IT infrastructures, national legislation and organisational principles as reasons for this. However, there are many similar challenges across countries, with gaps in knowledge not only regarding the implementation status but also solutions in other EU countries. The potential of consistently promoting cross-border knowledge transfer – which could accelerate the implementation of complex projects and optimise resources – has been underestimated and could be utilised to a greater extent. For example, increased strategic exchange with similarly positioned EU countries, ideally in an early implementation phase, could allow actors to leverage existing expertise. Dividing the implementation work between EU partners according to their respective resources and competencies, for example within pilot projects, should also be planned at an early stage. Finally, existing EU formats for project planning and coordination should remain widely utilised, with even greater focus on supporting national implementation efforts (see p. 24).



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1. The SDG Regulation

In the future, a range of relevant administrative services from EU countries should be available online and accessible across borders. The EU set this goal in 2018 with the adoption of the SDGR ((EU) 2018/1724) and the subsequent implementing regulations (EU) 2020/1121 and (EU) 2022/1463, which established the legal framework for this initiative. The main idea is to create a »single digital gateway« that strengthens the European internal market by providing a uniform, seamless and user-centric range of digital administrative services and supplementing them with verified information. In this way, it should become easier for businesses and citizens to interact with public administration across borders.

The SDGR set several sub-goals that were to be met by December 2023. First, information about certain administrative services had to be provided in several languages. Subsequently, the processing of these administrative services had to be made digital and seamless. The final step was to make it possible to access and process these services across borders.

The annexes to the SDGR outline specific areas of life for which information on selected procedures (Annex I) and digital administrative services (Annex II) and/or support services (Annex III)¹ must be made available. These areas apply to both citizens and businesses. Examples of relevant services include providing information on buying and selling real estate, enabling the seamless submission of applications for admission to public universities, and allowing businesses to digitally register employees for necessary insurance and pension systems ((EU) 2018/1724). However, according to Art. 6 of the SDGR, only those administrative services that already exist nationally must be made available digitally ((EU) 2018/1724). This means that no new administrative services need to be created. Accordingly, although 21 administrative services are listed in Annex II of the

SDGR, Germany currently has corresponding services for only 18 of these and is therefore obliged to implement only these 18 services (BMI 2024c). A list of these services can be found on the OZG Information Platform.²

The practical implementation of the SDGR is largely left to the Member States and depends on their specific national contexts. The regulation only stipulates that a national SDG coordinator must be appointed at the federal level or equivalent in other EU countries. According to Art. 28 of the SDGR, these coordinators serve as contact points for the European Commission as well as liaisons for their respective administrations on questions relating to the regulation. The coordinators are also involved in monitoring the implementation and ensuring compliance with the SDGR. Member States can decide whether the coordinator should take on additional responsibilities and are largely free to determine the technical implementation details. However, certain requirements must be met, such as the provision of information in English (BMI 2024b).

As of September 2023, an interim report on the SDGR implementation status revealed that no EU Member State had fully met all the requirements (European Commission 2023b). In Germany, for instance, there are still gaps in the fulfilment of the SDGR. According to the report by the European Commission, 99 percent of the information required by the SDGR is already available in several languages in Germany (European Commission 2023b). Regarding the provision of digital services, a report by the Federal Interior Ministry (BMI) states that although there are currently digital solutions for 17 of the 18 procedures to be implemented, not all of them have been fully rolled out (BMI 2024c). Efforts are ongoing to improve this coverage as part of the implementation of the Online Access Act (»Onlinezugangsgesetz« - OZG). The greatest challenge in Germany is

¹ Support services (Article 16 SDGR) include additional assistance for administrative services. According to Annex III of the regulation, these include universal contact persons or national contact points for cross-border healthcare.

² Available online at: <https://informationsplattform.ozg-umsetzung.de>

the cross-border implementation of digital services. Although the cross-border exchange of evidence is being tested in some initial projects, such as a pilot project by North Rhine-Westphalia together with the Netherlands and Austria for cross-border business registration (see information box on p. 11), the comprehensive use of cross-border services is not yet possible.

The implementation of the SDGR is therefore a work in progress. The core goal of promoting cross-border digital administrative services remains intact and will continue to be supported through current and future regulations, such as the Interoperable Europe Act ((EU) 2024/903). Other EU initiatives, such as the EUDI Wallet, also present opportunities for synergies (European Commission 2024). In Germany, the SDGR is also closely linked to the OZG and register modernisation («Registermodernisierung«).

Therefore, the SDGR should not be viewed as an isolated initiative; rather, it is part of an ongoing transformation process that is largely shaped by the diverse administrative structures and digitalisation projects across the Member States. For all involved, this process is accompanied by the significant organisational challenge of implementing the regulation and its requirements within these complex landscapes.

2. The SDGR in the context of other digitalisation projects

A unique aspect of the SDGR is its interdependence with other digitalisation projects in Germany, where its implementation does not constitute a separate large-scale digitalisation project. Instead, many of its requirements are being addressed through the two ongoing projects OZG implementation and register modernisation, as these were linked to the SDGR. Additional requirements that are not already covered by OZG implementation and register modernisation concern, for example, the type of evidence exchange or the language used (BMI 2023a). However, since the additional requirements do not warrant a separate project, the implementation of the SDGR requirements is integrated into these existing projects and is financed accordingly. The connections between OZG, register modernisation and the SDGR can be summarised as follows (see also Figure 1):

Online Access Act: The OZG mainly covers the digitalisation of administrative services and the provision of verified information about them. The relevant actors at the different administrative levels technically implement the services independently, often with the help of IT service providers. Given the deadlines for the implementation of the SDGR, services relevant to the SDGR were given priority in the implementation of the OZG (BMI 2023c). The implementation of the SDGR in Germany is also based on the OZG maturity model, which defines different levels of digitalisation from »0: No information available online« to »4: Services are available online and compliant with the once-only principle«. Since a key element of the SDGR is adherence to the once-only principle, the requirements of the regulation are typically met only when OZG services reach maturity level 4. However, since OZG implementation is still incomplete in many areas, the progress of SDGR implementation is also hindered. The SDGR also presents additional quality requirements for digital administrative services that must be taken into account, such as the collection of user feedback (BMI 2023c).³

Register modernisation: Many services require specific documentation, such as a birth certificate or registration certificate. However, since there is currently no uniform digital interface to access the data of other public authorities, they cannot share available data with one another. This results in individuals having to submit the same document repeatedly and in analogue form. Register modernisation aims to implement the once-only principle in Germany and thus lay the foundation for the seamless processing of administrative services. For this purpose, the National Once-Only Technical System (NOOTS) is being developed to facilitate the domestic exchange of evidence, connecting various registers and online services through a common infrastructure. The SDGR imposed the additional requirement that this exchange of evidence must also be facilitated across borders for the procedures outlined in the regulation. To this purpose, NOOTS will be linked to the European Once-Only Technical System (EU-OOTS). An intermediary platform will serve as the link between NOOTS and EU-OOTS, thus bridging the national and EU technical systems (Federal Office of Administration 2024). However, NOOTS is still under development. In order to fulfil the SDGR obligation of connectivity to the EU-OOTS, the NOOTS components that are relevant to the SDGR will be made available first.

³ According to the SDGR, users must be able to provide feedback on the services available online. For this purpose, the national feedback component was developed, which can be used by all actors.

Cross-border implementation of the once-only principle: On behalf of the Federal Ministry of the Interior and Home Affairs, the Ministry of Economic Affairs, Industry, Climate Protection and Energy of the State of North Rhine-Westphalia is developing an intermediary platform for the cross-border implementation of the once-only principle. This platform was successfully tested in January 2023 for cross-border business registration with the Netherlands and Austria (BMI 2023b).

In May 2024, the platform was used in an additional administrative area when North Rhine-Westphalia, together with Hamburg, tested the cross-border exchange of birth certificates with several EU Member States (Austria, Belgium, Spain, Slovenia, Lithuania, Latvia, Italy and Poland) using the example of the online service “Kinderleicht zum Kindergeld” (“easy access to child benefit”). Evidence was retrieved from or transmitted to these countries (BMI 2024a).

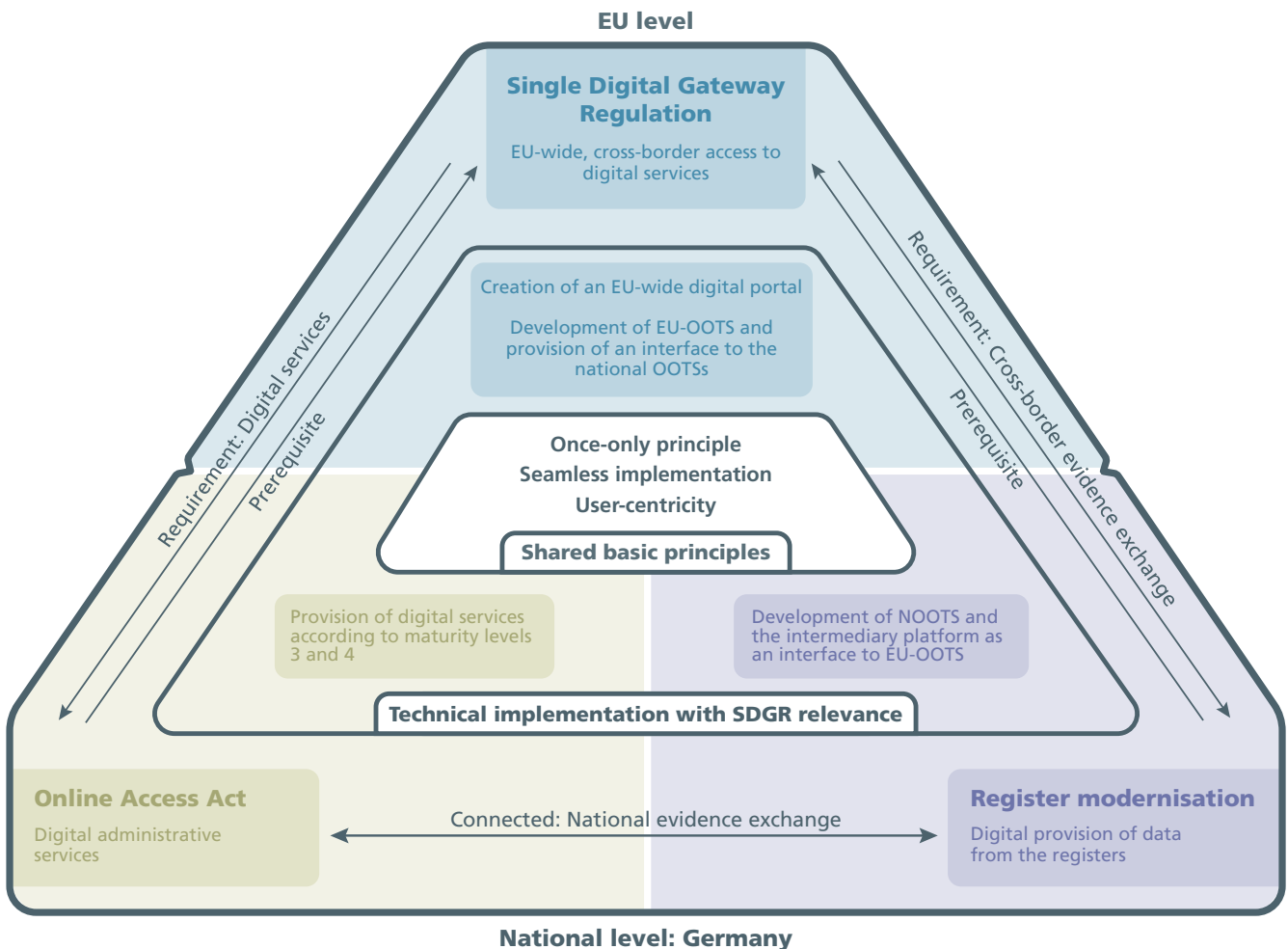


Figure 1: Legal and technical relationships between the SDGR, OZG and register modernisation



3. Implementation of the SDGR in the EU Member States – a comparison

The implementation of the SDGR was due to be completed in December 2023. However, it became clear long before this deadline that the Member States would need more time to meet all the requirements of the regulation. There were several reasons for this. In some countries, implementation was complicated by national circumstances, such as strong federalism, a lack of funds, or gaps in national legislation, which should require certain actors to implement the regulation. At the same time, the differing framework conditions and diverse approaches to digitalising administration in the EU Member States were not sufficiently considered when designing the SDGR. Added to this were delays on the part of the EU: For example, the Implementing Regulation (EU) 2022/1463, which sets out the specifications of the technical system for the cross-border exchange of evidence, was not published until 2022, two years after the SDGR came into force. Moreover, the interface for connecting the national OOTSs to the EU-OOTS has yet to be completed. Overall, implementers have faced numerous challenges for the timely fulfilment of the SDGR.

To gain a better understanding of the various approaches and challenges in implementing the SDGR, interviews with twelve implementers at various administrative levels from five EU countries (Germany, Austria, Ireland, Spain and Sweden) were conducted in the summer of 2023 in addition to desk research. The focus of the interviews was on specific approaches, established work methods and underlying organisational principles, along with the experiences of the interviewees. The findings presented here provide an overview of how the implementation and work are organised, followed by a discussion of the challenges identified in the subsequent chapter. The primary focus is on Germany, supplemented with additional insights and examples from other countries.

3.1 Resources and responsibilities

As mentioned earlier, the implementation of the SDGR is generally not a standalone project. Rather, it is integrated into the

implementation of other large-scale digitalisation projects, such as OZG implementation and register modernisation in the case of Germany. Interviewees from other countries, such as Austria and Ireland, also stated that no specific national implementation structures for the SDGR were created. In these countries, too, SDGR implementation is treated as an additional task that largely falls under existing structures. Consequently, there are no dedicated resources for the implementation of the SDGR; existing resources and personnel that have already been allocated to other digitalisation projects are also tasked with implementing the SDGR. The only position specific to the SDGR that must be filled is that of the national SDG coordinator.

An exception to this is Sweden, where a dedicated department for the SDGR was created within DIGG (“Myndigheten för digital Förvaltning»), the Swedish Agency for Digital Government. The SDGR department has its own budget and 25-30 employees for the implementation. However, it does not have the authority to mandate municipalities to implement the SDGR, meaning it largely relies on their willingness to make their services and information available for the fulfilment of the SDGR.

A look at the distribution of tasks for the practical implementation of the SDGR shows that in all the countries examined in this paper, every administrative level is affected by the implementation – albeit to varying degrees – and must be involved accordingly. Responsibility structures vary from country to country, but a common theme among interviewees was that they often have a variety of other (related) responsibilities beyond the implementation of the SDGR.

In Germany, the responsibility structure for implementing the SDGR is organised as follows: The national SDG coordinator oversees the overall management of the implementation process. He is responsible for fulfilling the tasks required by the SDGR and for identifying the services relevant to the regulation. Additionally, SDG coordinators are appointed at state level in Germany. They meet quarterly with the national SDG coordinator as part of the SDG network meetings (BMI 2023d). Each federal ministry also designates its own SDG officer. According

to the interviewees, the primary role of these additional coordinators is to facilitate communication between the individual actors and to form a network for sharing information.

The technical implementation of digital administrative services in Germany is managed by various authorities at different administrative levels. The distribution of tasks generally follows the existing responsibility structure, meaning that departments and administrative levels that are already responsible for the analogue services generally also assumed responsibility for the implementation of the SDGR. The bodies responsible for the corresponding OZG services additionally took on the implementation of the SDGR requirements. Since many of the administrative services affected in Annexes I and II of the regulation must also be implemented at the municipal level (BMI 2024c), municipalities play a significant role in the overall implementation of the SDGR. However, because federal states and municipalities are independently responsible for implementing the parts of the regulation that concern them, the framework conditions, strategies and implementing actors can vary widely both within and between the federal states of Germany.

3.2 Monitoring

One of the primary responsibilities of the national SDG coordinators is to monitor and document the entire implementation process. How they carry out this task is largely up to them, or rather the Member States. In the interviews, it was found that targeted monitoring structures have rarely been established. In Austria, for example, there is only an informal exchange on topics related to the SDGR. Experts from Ireland, Sweden and Spain also reported that there are no concrete monitoring structures for the SDGR in their respective countries. Overall, many of the interviewees from various Member States indicated that there are no additional domestic reporting obligations beyond the reporting obligation to the EU. Instead, more detailed discussions about current projects relating to the SDGR tend to occur within existing formats on SDGR-related topics. As a result, those responsible for the implementation are often dependent on receiving relevant information from informal exchanges. An exception to this is Germany, where basic monitoring structures were established during the implementation process.

The current status of SDGR implementation in Germany is tracked in two dashboards. The non-public SDG1 dashboard is intended for the national SDG coordinator and the SDG coordinators at state level. This dashboard is similar in structure to the Digital Administration Dashboard (»Dashboard Digitale Verwaltung«) and is primarily used to record the current level of fulfilment of the information requirements, as well as for communication with the state coordinators. Fulfilment levels are categorised as »not fulfilled«, »minimally fulfilled«, »partially

fulfilled« and »fully fulfilled«. The criteria are based on the text modules provided and their availability in English.

In addition, there is a non-public SDG2 dashboard that contains information on the current implementation status of the administrative services affected by the SDGR. This shows, for example, the total number of SDGR procedures to be implemented, the number of online services currently implemented and the chronological progress of the implementation status. However, it only uses three categories: »Implemented«, »Not yet implemented« and »Not monitored«, meaning that ongoing implementation projects are not recorded. Consequently, feedback on specific challenges or issues faced by implementers is not systematically collected.

3.3 Collaboration and knowledge transfer

At European level, there is a dedicated exchange platform regarding the SDGR for all EU Member States, known as the SDG coordination group. This group is made up of a representative of the EU Commission and the national SDG coordinators from each Member State. They meet approximately six times a year and also exchange information between meetings (European Commission 2023a). The group's tasks and responsibilities include sharing and regularly updating best practices for SDGR implementation, as well as supporting the EU Commission in developing common ICT solutions for the EU-OOTS. Furthermore, in order to facilitate coordination among specialists involved at the operational level across Member States, as well as clarify technical and organisational aspects and make joint decisions, the EU Commission has established six subgroups under the coordination group. These subgroups, made up of representatives from the Member States, each deal with an aspect of EU-OOTS implementation (see Figure 2). They enable the Member States to exchange and develop ideas for the actual implementation of the regulation, thus promoting basic EU-wide harmonisation. Germany regularly participates in all six subgroups, and according to interviewees, representatives from their respective countries also take part in at least one of the groups.

Within the Member States, there are limited SDGR-specific cooperation formats or working groups for knowledge exchange. The only established exchange format in Germany is the SDG network meeting mentioned above. Interviewees from other EU countries noted that discussions regarding SDGR topics typically occur within the context of other national (digitalisation) projects.

Aside from the exchange formats described, structured cooperation is limited, both domestically, such as in the form of user communities, and between Member States. One notable

exception is Sweden, where collaboration under the framework of the »Nordic Cooperation« aims to create common standards and provide existing technical solutions open source across national borders. Although this cooperation format is not specifically tied to the SDGR, it does influence its implementation. SDGR-specific work methods or tools are not used. When describing their specific approach and work methods, the interviewees often mentioned general aspects such as the advantages of agile working and the usefulness of permanent, interdisciplinary teams.

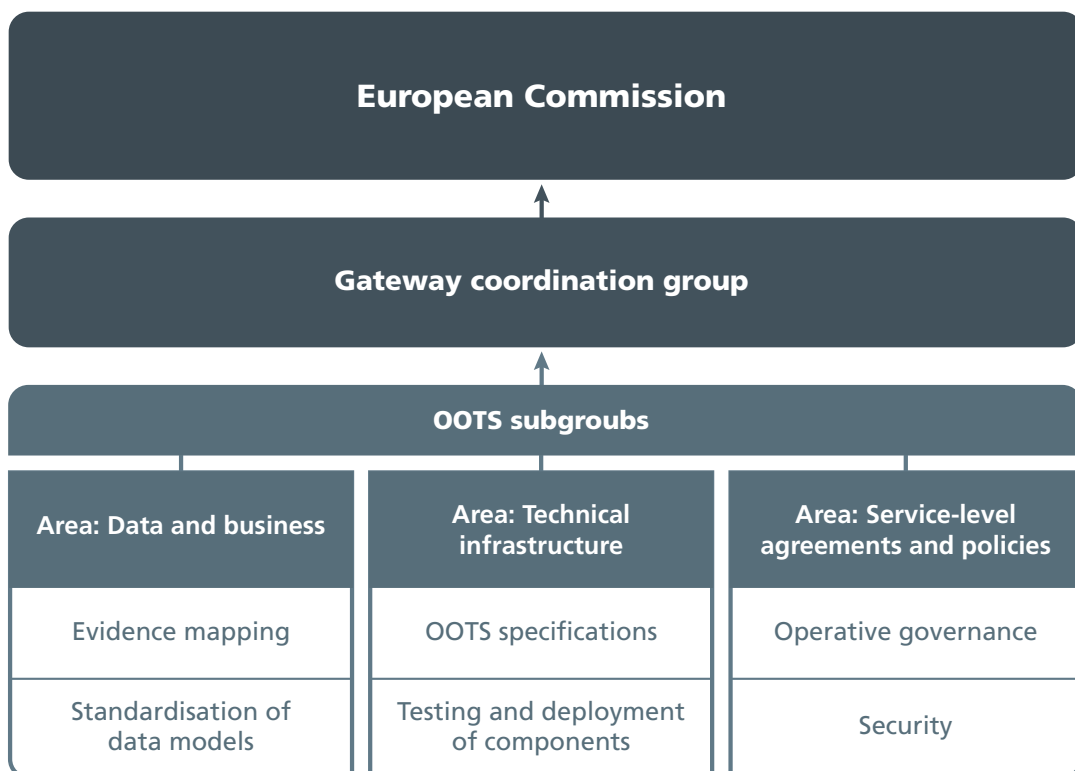


Figure 2: Governance of the SDGR at EU level



4. Challenges of implementation

Based on the findings outlined above regarding organisational structures, specific procedures and work methods, various challenges were identified across multiple Member States, which thus appear to be key to the implementation of EU-wide digitalisation projects:

Complexity hinders management of the implementation process

The diversity and complexity of administrative landscapes affect the implementation of a regulation. For example, the implementation of the SDGR in all Member States is closely linked to national initiatives and large-scale projects to digitalise administration. This complexity makes it very difficult to manage the implementation process in a targeted manner, as many elements are closely intertwined. A lack of financial resources means that an incentive system cannot be used, while limited accountability requirements for the implementers and a lack of feedback options make it even more difficult to gauge the actual progress of the implementation and to understand specific issues faced by those who have not yet achieved the targets. As a result, there is a lack of detailed data to support the strategic management of the individual project and to identify areas where intervention is needed, as well as adequate options for responding to these problems.

Unclear assignment of roles and responsibilities

Another challenge in the context of SDGR implementation is the often ambiguous allocation of roles and responsibilities. Interviewees consistently noted in different contexts that responsibilities were not always communicated clearly, leading to a broad diffusion of responsibility and gaps in knowledge. This was particularly evident at the local administrative level in the respective EU Member States. Even when responsibilities are clearly assigned, the new SDGR-related role is often an additional task for an existing team or individual, creating a perception of the regulation as a tedious additional burden.

Difficulties in engaging municipalities

In the context of the SDGR, exchange and interaction at the municipal level were perceived as particularly challenging, as there is usually no institutionalised communication between the municipal level and the SDG coordinators at the national level. In Germany, the federal government is prohibited under the constitution from directly assigning tasks to municipalities. Both in Germany and Austria, there is often only sporadic exchange between municipalities and the SDG coordinators of the respective (federal) state. Although municipalities are also affected by the SDGR requirements, they are not strategically integrated into the development and delivery stages of the implementation process, which can cause delays in fulfilling the regulation.

Lack of support

The interviewees often described feeling unsupported in many tasks or inadequately equipped with resources and information. This suggests that current support services and the integration of the SDGR into existing systems may not yet be sufficiently comprehensive or tailored to the needs of the implementers.

Many interviewees criticised the available information materials, such as guidelines, as being too abstract and lacking in concrete, practical advice or examples. This absence of information and support has led to delays in implementation. A particular challenge is interpreting the SDGR and deriving the specific obligations, which requires implementers to first spend considerable time building up the necessary expertise and defining tasks. This fuels frustration among implementers, who may not already have the necessary know-how, and further slows the implementation process.

Relevance and benefits are not clearly communicated

The frustration described above was also observed in other areas among the interviewees. Most of the interviewed experts could see only a very limited number of use cases of the SDGR

4. Challenges of implementation

and therefore perceived it primarily as an additional burden. Only a small number of respondents pointed to the benefits and positive effects of the SDGR; for example, in Germany, the regulation has helped to accelerate register modernisation. Moreover, the mandatory nature of the SDGR has created the necessary pressure to transform national systems. Additionally, the implementation of the SDGR could provide tangible relief for businesses operating across borders. However, most interviewees were unaware of these positive side effects and possible benefits, and some respondents at the municipal level reported knowing nothing at all about the SDGR. This results in a lack of acceptance for the implementation of the regulation. The challenges therefore lie in clarifying these uncertainties and misunderstandings, conveying the relevance of the SDGR and thereby creating acceptance, as well as supporting and motivating implementers. All of this would enable the implementation to run more smoothly.

The potential of (international) cooperation is not fully utilised

Another challenge lies in the limited knowledge about the implementation of the SDGR both in other countries and at other domestic administrative levels. The lack of exchange formats and institutionalised cooperation makes it difficult to learn from one another and to leverage existing solutions effectively. This means that much potential is wasted to make the implementation of the SDGR more efficient, as successful solutions and insights are not systematically shared. It is also difficult to initiate cooperation when there is little clarity about which partners would make viable collaborators. Interviewees often highlighted differences among the Member States, especially with regard to technical requirements, political structures and legal frameworks. Despite these considerable differences, however, similar organisational and internal administrative challenges emerged across the board. This indicates that a strategic challenge lies in alleviating knowledge gaps and actively fostering cross-border exchange in order to learn from one another and better utilise opportunities for synergies.



5. Recommended actions

The previous chapter offered a concise overview of the challenges and obstacles in implementing the SDGR, along with possible reasons for its delay. The analysis highlighted that legal frameworks, organisational structures, limited resources, delays in implementing national projects, and existing IT infrastructures place tight constraints on the coordinating and implementing actors. It also became clear that, despite all their differences, no EU Member State was able to meet the deadline for implementation of the SDGR. As described, this was also due to delays on the part of the EU and, according to many interviewees, the fact that the regulation does not sufficiently account for national contexts. The following recommended actions therefore focus primarily on organisational factors that, within the constraints of existing framework conditions, can help to facilitate the implementation of future projects and positively influence the further implementation of the SDGR. These recommendations are grouped into four areas of action: support structures, communication, monitoring, and international cooperation (see Figure 3). They are directed mainly at implementers and decision-makers at the various administrative levels, particularly in the German federal and state governments (and their equivalents in other Member States).

5.1 Establish and integrate targeted support structures

Interpreting EU regulations and adapting the requirements for implementation in Germany is highly complex. The federal government faces the dual challenge of meeting EU accountability obligations while supporting the federal states in advancing implementation. The federal states, in turn, must support the municipalities in this process, in addition to adapting the administrative services that fall under their own responsibility. The evaluation of SDGR implementation in the previous chapters highlighted how essential this support is. At the same time, it revealed the challenges of involving, informing and empowering the relevant actors. To minimise possible delays and misunderstandings early on and to ensure that implementers

feel supported, it may be beneficial to adopt a strategic joint approach to information management, knowledge transfer and participation from the outset. Specifically, the following measures are recommended:



Develop user-oriented information materials early on:

It is crucial to tailor information about the project specifically to the various administrative levels, internal authority structures, and service providers. Despite the recognised need for such customised information materials at all levels, in practice, these resources are often still lacking or are delivered too late to those who need them. To address this, responsible actors – in Germany, primarily the federal and state governments – should focus on refining their information offerings to better meet the needs and responsibilities of the respective implementers. The information provided should be tailored as precisely as possible to the specific context, considering factors such as the appropriate level of detail, degree of abstraction, and information density. In addition, the effectiveness of different forms of communication should not be underestimated. A range of communication formats and media can be utilised to ensure that content is shared in a flexible and targeted manner. Such formats could include legally secure interpretation aids, practical guidelines, checklists, detailed manuals, or explanatory videos. Accompanying information seminars, training courses, and Massive Open Online Courses (MOOCs) can also help to address local needs and issues. For instance, in the state of Baden-Württemberg, so-called »digital pilots« (»Digitallotsen«) received training on the SDGR as part of an online seminar organised by the municipal state associations (Municipal State Associations of Baden-Württemberg 2023). The seminar included an explanation and contextualisation within the broader European framework, along with an outline of the tasks for municipalities. Project-specific training can also be integrated into the many existing programmes aimed at digitally upskilling administrative employees, such as state-level academies and competence networks.



Make information more accessible and develop targeted distribution strategies:

It is equally important that relevant information reaches the intended audiences. This means ensuring easy accessibility, findability and distribution of information that is tailored to target groups. Relevant information and training resources should be even more deeply integrated into existing structures and closely linked with established advisory services aimed at digitalising administration. A key task is to present information online in a clear and strategic way, ideally using familiar platforms and information websites. For example, to reach municipalities, online portals run by the federal states can be effective, especially those designed to support municipalities with digitalisation in general or with implementing the OZG in particular. The focus here should be on providing the information in a well-structured way and linking relevant information. This includes contextualising the project alongside other digitalisation initiatives, providing further links to useful supports, and regularly updating the information to ensure it remains up to date. Furthermore, all stakeholders can benefit from a central information hub that consolidates relevant information on comprehensive and ideally freely accessible portals. In Germany, for example, information about the SDGR has been consolidated and made freely accessible at federal level through various platforms, such as the OZG information platform (information on services relevant to the SDGR and contact points), the OZG guide (»OZG-Leitfaden«, information on governance and implementation management), and the federal portal of the Federal Ministry of the Interior and Home Affairs.

At the same time, established event formats and conferences, such as the conferences of specialised ministers, can be used to disseminate existing information materials more widely. It is crucial to distribute these resources through various channels and to involve as many stakeholders as possible from the outset. This means addressing these actors – from committees and associations to existing networks and alliances – at an early stage and actively engaging them. To enhance knowledge transfer to the municipalities, for example, the state associations and municipal umbrella associations can be specifically addressed and included in communications. These organisations already have established relationships and communication channels with municipalities, understand potential needs and know how to tailor support offers effectively.



Establish contact and advisory centres for municipalities and actively address municipal actors:

Closely related to this is the challenge of providing project-specific advice in a way that reaches as many actors as possible – especially municipalities, which already face significant challenges in digitalising their administration and related national measures. There is a well-documented need for external

support in the form of advice and networking opportunities (Hornbostel et al. 2022). Many smaller municipalities, in particular, feel ill-equipped to implement the legal requirements of national projects independently and require additional support (Hornbostel et al. 2022). A multifaceted approach is therefore important and can help to effectively introduce an initiative into municipalities. On the one hand, dedicated contact points are needed – especially at federal state level – who can be reached quickly and easily by actors seeking assistance. On the other hand, strategies are needed that proactively pass on information and offers of support to those involved, even if they are not actively looking for help.

A contact person who is experienced in detailed questions can provide valuable advice on technical issues, assist with prioritisation, and clarify the specific requirements that arise at different stages. Integrating this support into existing municipal advisory structures is particularly important for ensuring easy access to support through established formats. One example is the OZG municipal coordination office in the state of Hesse, which comprises four representatives of the Hessian municipal umbrella organisations and a representative of the Hessian Minister for Digital Strategy and Development. This body coordinates issues of municipal digitalisation in general and is also the contact point for municipalities on issues relating to OZG implementation. In this context, it also deals with the implementation of the SDGR. Such institutionalised contact points offer the opportunity to obtain structured feedback from municipalities and actively involve them in the further development and expansion of support services. They create an important channel for identifying specific advisory needs, allowing for iterative adjustments to ensure that services are genuinely tailored to those needs. Including municipal associations in such an advisory structure also enables insights into the sentiment in municipalities, offers a clearer picture of on-the-ground implementation, and opens up additional communication channels. This is particularly beneficial for federal and state governments, especially when there are otherwise limited opportunities for exchange.

In addition, analogue and in-person support structures play an important role in facilitating direct on-site exchange, as they allow for active engagement with those involved. Many states are increasingly training contact persons from municipalities to become digitalisation experts through specialised qualification programmes and using them as multipliers. Examples of this include the municipal digital pilots in Baden-Württemberg and the digital pilots and digital navigators in Saxony. Approaches of this kind offer great potential for actively disseminating the requirements of a specific project through targeted training. As experts in their respective municipalities, these representatives can help raise awareness of a regulation and its requirements, promote transparency, and alleviate concerns. Currently, about a third of all German municipalities have a central office for digitalisation projects (Geschäftsstelle Stadt.Land.Digital. 2022),

which opens up new opportunities for active involvement of the municipalities.

Moreover, encouraging networking between municipalities is essential for (informal) knowledge transfer and can advance implementation efforts. Although the need for inter-municipal networking in the context of digitalising administration is a widely discussed topic (Geschäftsstelle Stadt.Land.Digital. 2022), it is still sometimes overlooked, as could be seen in the context of implementing the SDGR. To address this, more intensive efforts are needed that go beyond conferences and short-term exchange formats, with the aim of fostering and also coordinating inter-municipal cooperation on specific projects.

5.2 Shape communication to focus on benefits and foster dialogue

The motivation of those implementing a regulation such as the SDGR ultimately plays a crucial role in its successful implementation. This is especially true when a project's success depends heavily on the commitment of all stakeholders, for example due to diffuse responsibility structures or limited financial resources. It is therefore important to clearly and convincingly communicate the value, relevance and long-term goals of the initiative. In the context of implementing the SDGR, it became clear that many stakeholders struggled to see the potential benefits or successes of the regulation. The interviews revealed that the implementation of a European or international project carries the risk of being perceived as a long-term, burdensome additional task that accordingly receives relatively low priority. These problems and the resulting effects can be counteracted by a communication and dialogue strategy that is initiated early on by the coordinating actors. Such a strategy can highlight the benefits of the project, reduce complexity, and foster transparency and trust. Specifically, the following measures are recommended:



Proactively communicate benefits and potential:

In highly complex projects that require adaptation into national structures and comprehensive support services for this process, the actual relevance of the project can be overlooked in communications. This makes effective communication even more critical, especially when the project's impact is not immediately tangible for the many implementing actors. For successful implementation, it can therefore be helpful if coordinating actors communicate the potential benefits of the project early on, using a well-prepared communication strategy. To this end, both the short-term and long-term advantages of the project should be presented as clearly as possible, directly relating these to the everyday challenges of the implementers. In the context

of EU projects, it can be particularly worthwhile to develop detailed use cases that illustrate relatable scenarios, case studies, and real-life situations. These examples can help implementers understand the positive effects and tangible benefits of the regulation. At the same time, the effectiveness of highlighting positive secondary effects should not be underestimated. For example, according to some of the experts interviewed, the SDGR has had a positive effect on the progress of register modernisation in Germany – a side effect that many implementers may not even recognise.

Ultimately, effective communication about digitalisation projects should aim to highlight synergies with other initiatives, reduce complexity and clearly define the distribution of tasks. It is crucial to specify which aspects of the project are relevant to the respective target audience and which requirements are already being implemented in the context of other projects. By making these connections clear, acceptance can be boosted, particularly for projects whose direct effects may not be visible at some levels in the short to medium term. A communication strategy or campaign can also build trust and promote acceptance for a project if it is designed to be dialogue-oriented. This should involve communicating implementation progress and challenges transparently and not only regularly informing implementing actors and intermediaries about current developments, but also actively seeking their input on the concerns and challenges they face.



Make good practices easy to find online and link them:

One of the best ways to showcase the feasibility of projects is through successful practical examples. Although the importance of communicating good practices is widely recognised, they are often too difficult to find for those who need them. To improve this, efforts can be made to increase the accessibility of good practices to interested parties – beyond only presenting them at conferences or in reports. There is no need to create new infrastructure for this; instead, successful implementation examples and approaches can be integrated into existing digital overviews and catalogues. For municipalities, for instance, these examples could be added to existing databases of good practices, digital atlases, or navigators for municipal digitalisation projects. However, such integration requires careful elaboration and maintenance – from choosing the right keywords to formulating the project description. In the case of Europe-wide or cross-border projects, a link or reference to corresponding platforms and databases in other EU countries can also be helpful. Even a simple reference can open doors, revealing potential parallels and helpful strategies that might not be immediately obvious to those implementing the projects.



5.3 Simplify management through greater transparency and data-based decision-making

Managing a large-scale, multidimensional EU project is exceptionally challenging. As previously discussed, relying solely on symbiotic links with other digitalisation projects, as in the case of the SDGR with register modernisation and OZG, is insufficient for the effective management of the implementation process. Additionally, the absence of specific intervention and steering mechanisms hinders the targeted management of the project.

Overall, the implementation of the SDGR highlights several major challenges: low accountability requirements, limited (financial) incentives, gaps in knowledge about the implementation status, a lack of possibilities to impose sanctions, and difficult framework conditions – all of which significantly complicate the fulfilment of the project. To enable effective oversight under these conditions, a robust data basis is essential. This can support evidence-based decisions and equip decision-makers to take a more strategic approach. The following recommendation aims to address this need:



Improve monitoring structures:

A more systematic and detailed monitoring process can create the basis for taking targeted measures. In order to generate the most reliable data possible, monitoring must be designed accordingly. This requires gathering as much suitable and sufficiently detailed data as possible. To obtain this, all implementing bodies should participate in the monitoring process, which could be facilitated by establishing mandatory monitoring requirements, for example. In the case of SDGR implementation, the responsibilities for overall monitoring and reporting to the EU lie with the federal government. The expansion of monitoring structures to include federal states could enable more systematic reporting to the SDG coordinators, while allowing the effective tracking of successful examples of implementation or innovative approaches at municipal level. In essence, it is crucial to identify ways to hold all implementing bodies accountable and to establish monitoring structures across the relevant administrative levels. One example of this can be found in the German federal state of Hesse, where monitoring at federal state level focuses on the procedures set out in Annex II of the SDGR. The associated requirements have been summarised into packages, and for each of the procedures, the relevant state ministries – working with municipalities – provide quarterly updates on the status of implementation to the SDG coordination, together with concrete information on how the coordinating bodies can provide support.

Beyond expanding accountability, the level of detail in monitoring is also critical. Greater data accuracy can be achieved by

capturing more detailed stages of development in implementation, rather than only distinguishing between a few categories of implementation status. These stages can be defined precisely in advance and ultimately provide a more differentiated picture of where the implementing bodies currently stand. Such nuanced monitoring could also help to identify specific measures to support implementation at a given point. This could be supplemented with a feedback component, which would enable implementers to report problems directly.

A final key step towards better oversight would be the detailed publication of monitoring results. For the SDGR, this would mean making the available dashboards publicly accessible. This would not only create transparency but would also enable better comparison across implementing bodies and thus foster the identification of good practices. Publishing the monitoring results would also enable stakeholders and researchers to identify levers and barriers to implementation and to develop solutions at an early stage.

5.4 Give higher priority to international cooperation

Cooperation between EU Member States is essential in the implementation of a cross-border digitalisation project such as the SDGR. However, it is often perceived as an additional, sometimes even unnecessary task and is not consistently pursued. As outlined in the previous chapter, there are several reasons for this. Some countries have limited resources and capacities for additional EU projects, partly because the national coordinators often balance multiple responsibilities and are already fully engaged with other projects. Moreover, implementing an EU regulation requires significant communication efforts to increase its visibility at other administrative levels, spread knowledge, and foster acceptance. In the case of the SDGR, this work is further encumbered by the fact that its actual benefits and use cases are not always clear.

Another obstacle is that national implementers often lack information about the requirements and implementation status in other EU countries. Knowledge and experiences are not often shared, and if they are, the focus is usually limited to technical aspects, with little exchange about work methods, communication strategies, information sharing, or training. As a result, many Member States tend to focus on their differences rather than their commonalities. This sentiment was also evident in the implementation of the SDGR, where diverse national contexts were described as barriers to a shared understanding of the regulation. Consequently, much potential for learning from each other or – regardless of differing framework conditions – developing common solutions that could drive greater EU-wide harmonisation is left untapped.

In view of this, international cooperation should be seen as a central component of implementing a cross-border digitalisation project such as the SDGR. In the long term, this approach would also help future EU digitalisation projects and the implementation of regulations, as cooperation partners and communication formats would already be established and there would be greater harmonisation among the Member States. The following measures can help to achieve this:



Leverage existing knowledge through strategic exchange with partners:

Despite their differences, the EU Member States face similar challenges when it comes to implementing an EU project such as the SDGR. In this case, limited resources, difficult communication and the need to foster understanding and acceptance of the regulation within each EU country have posed ongoing challenges. In this context, a strategic and regular exchange of experiences and solutions with other EU states and regions can be invaluable. This is particularly important in the early stages of a project, but also relevant in later phases, for example to receive support in dealing with specific challenges as they arise.

Various factors can be considered in the selection of strategic partners, such as similar governmental structures or geographical proximity. These aspects were also highlighted by interviewees in connection with the implementation of the SDGR. For example, countries with similar governmental structures – such as central or decentralised organisation – may find it easier to adapt one another's solutions and approaches due to (partially) similar conditions. An example of this is the collaboration between Sweden and the Netherlands, whereby similar state structures enabled implementers to share their experiences in connecting municipal procedures to the EU-OOTS. Geographical proximity can also facilitate long-term exchange, for example due to shorter distances or pre-existing, intensive contacts, as seen in the cooperation between the state of North Rhine-Westphalia and the Netherlands, or between Germany and Austria.

Specialist events, both in Germany and other EU countries, also provide excellent opportunities for establishing strategic contacts. These connections should be actively maintained and deepened through targeted follow-up. Efforts are underway to expand these contacts and to make better use of such events for networking and exchange on EU digitalisation projects. Nevertheless, it would make sense to significantly intensify these efforts. In doing so, the focus should extend beyond German events to include conferences and meetings across the EU.



Share the implementation work with partners and carry out joint pilot projects:

A more balanced distribution of implementation tasks among

multiple partners can help to ensure that existing resources are used more efficiently. This approach requires strategic cooperation and planning to identify common needs. On this basis, pilot projects, joint development initiatives or user communities can be set up. Germany is already pursuing this approach to some extent, especially the federal states that have strong networks and are particularly advanced in the implementation of national digitalisation projects. However, there is room to expand this approach and pursue cooperation of this kind even more widely. For future projects, it would be especially beneficial to plan a division of implementation tasks with EU partners from the outset, incorporating this more strongly into both strategy development and the national implementation process. An example of this in the context of the SDGR is the »Nordic Cooperation«, whereby the Scandinavian and Baltic states meet monthly to discuss legal and technical aspects of the SDGR and share open source solutions with each other. In a project funded by the Nordic Council of Ministers between 2021 and 2023, Denmark, Estonia, Finland, Latvia, Lithuania, Norway and Sweden evaluated and tested the proposed OOTS architecture for the SDGR, with the aim of identifying effective and cost-efficient joint solutions for evidence exchange. A targeted focus on developing and sharing open source solutions prevents the Member States from having to develop individual solutions multiple times and also enables countries outside of existing cooperation formats to benefit from these.

Pilot projects are also an important step towards implementing cross-border digitalisation projects by allowing real use cases to be tested and helping to harmonise technical systems across the EU Member States. For example, as part of pilot projects to implement the once-only principle, connections to the EU-OOTS as well as cross-border use cases have been tested. The trilateral pilot project between Germany, Austria and the Netherlands, in which cross-border business registration was successfully piloted (see p. 11), is a leading example. Other actors involved in implementation could learn from the experiences of this project in order to initiate pilot projects with partners on their own or join existing projects. In this way, functioning solutions can be shared more quickly, making implementation easier in the long term.



Make greater use of EU formats, also in national implementation efforts:

EU formats, such as working groups focused on the implementation of a regulation, play a critical role in shaping a cohesive digitalisation process across the EU. They provide a forum for the exchange of experiences and approaches to common challenges while respecting the principle of subsidiarity and the diversity of EU Member States. In addition, such formats can develop and recommend measures aimed at facilitating the implementation of the requirements set out in the regulation. Given this coordination and support role, it is important that all

5. Recommended actions

Member States are represented to ensure that their different experiences and interests are heard and to form a consensus that is viable for everyone.

As German implementers are already active participants in EU-level working groups, it would be beneficial to apply the experience gained from EU specialist events and other collaborative formats even more strongly to national implementation efforts. Successful EU formats, such as workshops, working groups or innovative exchange platforms, could be adapted for use at the national level, allowing for a broader focus beyond technical implementation to include governance and organisational aspects. One EU format that has proven successful in the context of SDGR implementation and could also be applied nationally are the Projectathons, three-day in-person or hybrid events in Brussels with the purpose of facilitating interoperability testing in a structured environment between Member States to assess their national OOTS implementation status (European Commission 2022). Projectathons enabled participants not only to share their own progress and gain insights into the developments of other countries, but also to forge new partnerships. The active participation of German implementers in Projectathons has advanced the implementation of the SDGR in Germany. For example, this format gave rise to joint initiatives with Belgium, Portugal and Luxembourg to carry out cross-border interoperability tests.

To maximise these benefits, Germany should continue to participate in EU formats like Projectathons, allocating resources to this, and also actively encourage other Member States and partners to participate. This concept could also be extended to other national and EU projects with various actors across the ICT field. Furthermore, to enhance participation, consideration should be given to involving implementers at the lower administrative levels more actively – especially in decentralised countries such as Germany. Direct involvement of these implementers, for example in the EU subgroups, would enable shorter communication channels between the federal levels and greater consideration of challenges outside the national level. This could facilitate quicker problem-solving and improve acceptance for a regulation such as the SDGR at the lower administrative levels.

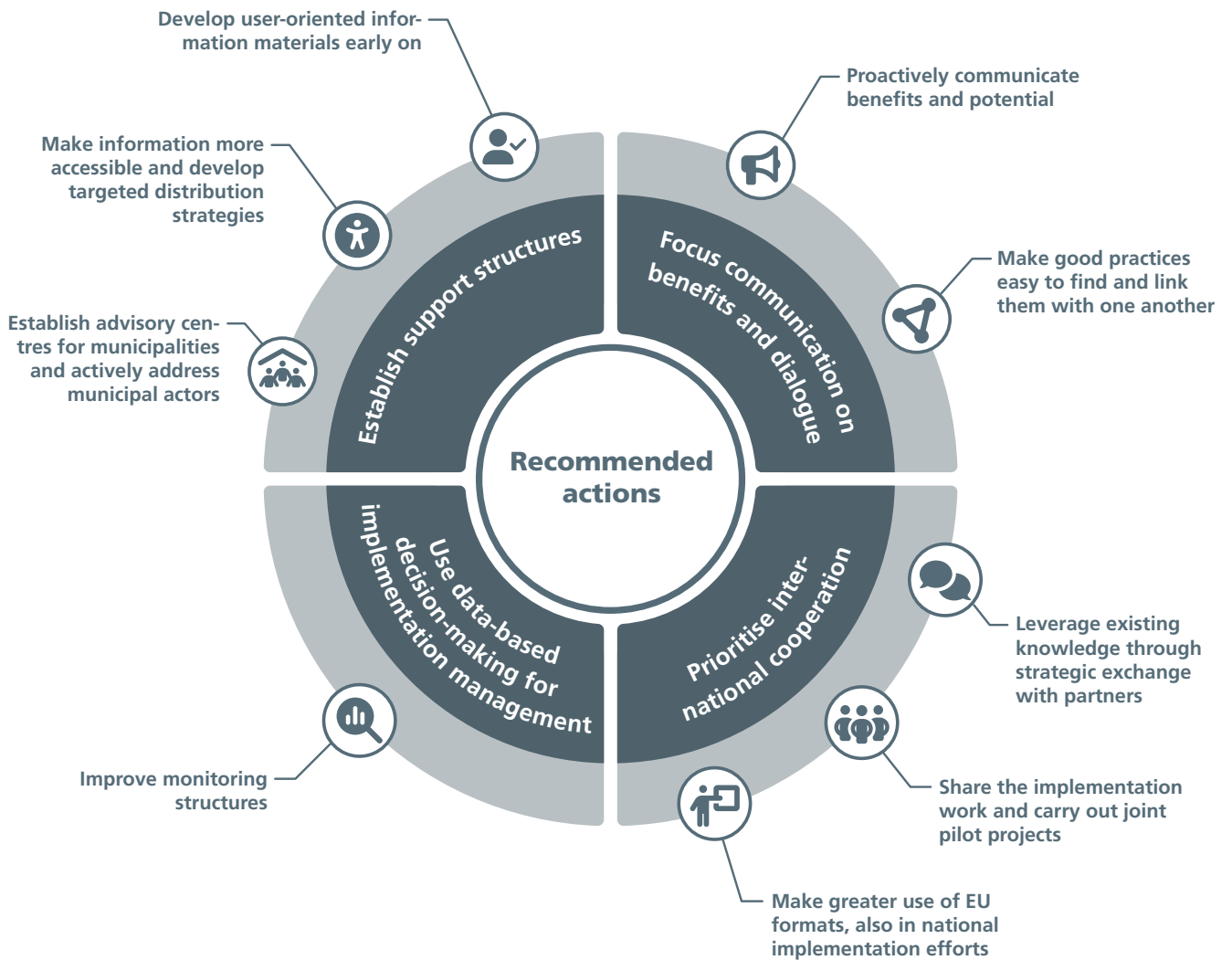


Figure 3: Overview of recommended actions



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Fahrkarten

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6. Conclusion

The cross-border provision of administrative services in the EU is an ambitious but worthwhile initiative that promises positive long-term benefits, such as strengthening the internal market and simplifying processes for businesses and citizens. The SDGR represents the first step in an ongoing transformation process that will continue to advance with upcoming projects, such as the EUDI Wallet for citizens.

Using the example of SDGR implementation, this White Paper has highlighted the fundamental challenges involved in fulfilling such a complex EU regulation. In particular, implementers face common organisational and operational challenges in management, communication and cooperation. This is partly due to the many dependencies and symbiotic relationships with other (digitalisation) projects and the considerable number of actors involved in the implementation process.

Limited resources and a shortage of skilled workers make it difficult to overhaul underlying structures. However, targeted adjustments in key areas can simplify the implementation of such projects in the future and amplify the long-term benefits.

To achieve this, it is essential to build on past experiences and initiate certain steps early on, such as creating a targeted communication strategy, establishing support structures, and conducting detailed, comprehensive monitoring. This includes the development and distribution of information material tailored to the target group and the creation of analogue and robust support structures. In addition, successes, benefits and positive secondary effects should be communicated proactively to motivate implementers and inform users about the new opportunities available to them. Moreover, existing networks should be used more strategically and further strategic partnerships with other EU Member States should be established, which can be expanded in the future.

Learning from the approaches and developments in other countries is equally valuable. Although looking beyond national borders may not always seem immediately promising, it often

reveals numerous similarities and common challenges. This insight would aid the development of future regulations and the smoother implementation of cross-border projects. In sum, increased networking, collaboration and mutual understanding are essential to realising the vision of a connected, digitalised administration in Europe.

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