



## **Strengthening of the capacity of the institutions from selected EU countries in the field of implementation of Regulations (EC) No 883/2004 and 987/2009 and introduction of the electronic data exchange (EESSI)**

### **The National Seminar in Finland 11<sup>th</sup> – 13<sup>th</sup> April, 2011**

## **RECOMMENDATIONS**

### **RECOMMENDATIONS TO THE COMMISSION**

#### **1. WEBIC**

There are delays in the national projects because of the delays in Siemens project and in the EU level. The technical documentation from Siemens and the Commission has not been sufficient and accurate enough by far. The technical documentation has also been delayed. According to the initial plans Siemens should have accomplished the WEBIC for testing purposes by March 2010. Because of the delay many member states are forced to use WEBIC instead of creating and using national applications.

The project countries have a common need at least to have the search function by PIN to be included in WEBIC. The project countries also think that the ICD3 solution must be relied upon, i.e. the ICD3 solution must be realised. For instance the Finnish earnings-related pension sector is relying on the ICD3.

The project countries are expecting a work shop on WEBIC as soon as possible. (Technical Commission members shall forward this message to TC and Steering committee's meetings.) Member states also need sufficient technical documentation on WEBIC in due time in the future. Also detailed information about the changes made in new document versions is needed.

#### **2. Transition period**

The issue of transition period refers to two separate questions.

##### **a. Procedures during the transition period when moving from the paper exchange of information to the electronic exchange of information (i.e. "the normal" transition period connected to changes in legislation)**

Finland has proposed a note suggesting a procedure for the pension sector during the transition period. The proposal was sent to the Steering Committee on 8<sup>th</sup> April. The suggestion concerns the situation when the pension case has begun on paper form. The case would then be continued in electronic form, but in separate flows. This suggestion which concerns only the pension sector has been described both in the above mentioned proposal and in the guidelines for the pension sector. Now, the same issue about the procedures for the transition time should be raised in all sectors.

##### **b. Possible prolonging of the transition period**

The question about the possible prolonging of the transition period should be raised at the national

Mailing address  
PO Box 450  
FI-00101 Helsinki, Finland  
Telephone +358 20 434  
Fax +358 20 434 xxxx

Street address  
Nordenskiöldinkatu 12  
FI-00250 Helsinki  
Finland  
firstname.surname@kela.fi

1 (3)

www.kela

and European level as soon as possible. It should be looked upon both from the technical and business viewpoint. For instance if there are some member states who are not ready to be connected to EESSI by 1<sup>st</sup> May how shall the members states proceed and with what consequences? If the transition period is to be prolonged the decision should be made in good time.

The project proposes that the current decision concerning the transitional period would be prolonged meaning that member states could transfer to electronic exchange by making bilateral agreements concerning a sector in a whole.

### **3. MD/PAI**

The contents of the MD/PAI should be improved. New guidelines for criteria for filling in the information are needed from the Commission as soon as possible in order to safe-guard the usability of the MD/PAI.

### **4. Preparation time for the end users of WEBIC**

The project countries think that the member states/institutions would need at minimum three months for preparations of the end users of WEBIC. The preparations would include for instance info, trainings and preparing of the guidelines etc. at national/sector/institution level. However, these preparations can not begin before WEBIC is ready and properly tested.

## **GENERAL RECOMMENDATIONS TO THE PROJECT COUNTRIES**

All project countries should check whether their national legislation is compatible with the European legislation related to EESSI.

Project countries should pay attention to that the costs of EESSI will be relatively high at the national level (thus, not only on the European level).

## **RECOMMENDATIONS TO FINLAND**

Finland should consider that it might be risky to begin with EESSI 1st May 2012 if other member states are not EESSI ready.

It would be good for Finland to follow the developments and timetables of the neighbouring countries Sweden and Estonia especially since approximately 70% of the international cases Finland have are with Sweden and Estonia.

Finland should consider very carefully what kind of changes to SEDs and flows should be suggested now and what kind of changes should be left to the future.

## **OTHER REMARKS TO FINLAND**

The overall architecture both at the national and international level seems good.

Valuable insights have been gained during the national seminar in Helsinki. The other participant countries have got ideas for instance concerning for the search function for national applications and the national so called "EESSI law".

## **ISSUES FOR THE NEXT NATIONAL SEMINARS**

National training plans

Recommendations for member countries from the EU about the staff for the national EESSI projects/organisations