

Brussels, 18 March 2026
Case No: 84786
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REASONED OPINION

delivered in accordance with Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice concerning Iceland's breach of Articles 6 and 7 of Directive 2006/123/EC on services in the internal market and Article 57 of the Directive 2005/36/EC on the recognition of professional qualifications

1 Introduction

The present reasoned opinion concerns the issue that the website designated as the Point of Single Contact (PSC) website in Iceland, namely island.is, falls short of complying with the requirements set out by the EEA law rules, in particular the Services Directive¹ and the Professional Qualifications Directive² (Professional Qualifications Directive or the PQD), as it does not provide the necessary information to service providers from other EEA States.

By letter dated 18 February 2020 (Doc No 1113547), the Authority informed the Icelandic Government that it had opened an own initiative case concerning the PSC in Iceland. In that letter the Authority requested information on various issues related to the performance of the PSC and any measures taken to follow up on the conclusions and recommendations addressed to Iceland by the European Commission in a report from 2015 (“2015 Report from the European Commission”) on the PSC performance in the EEA.³ This included questions on the e-completion of procedures and use of electronic means of identification and signature, availability of payment by foreign payment means, structure of information, and various aspects related to the usability and quality of the services under Regulation (EU) No 910/2014 *on electronic identification and trust services for electronic transactions in the internal market* (“eIDAS Regulation”).⁴

Following several correspondences⁵ and discussions at package meetings, the Authority issued a letter of formal notice on 29 March 2023 (Doc No 1334629) where it concluded that by

- not having set up a single entry-point website as PSC in Iceland serving as interlocutor of websites of national authorities for the purpose of the Services Directive and Professional Qualifications Directive, and in any event, by
- not providing the relevant information as required by the Services Directive available on or through the PSC,
- not providing specific information as required by the Professional Qualifications Directive on or through the PSC,
- not providing access to an electronic procedure for applying for a license or recognition of professional qualifications on or through the PSC, and
- not allowing for a full electronic process for the above purpose on or through the PSC,
- not allowing foreign eIDs, whether published or not in the Official Journal,

Iceland has failed to fulfil its obligations arising from Articles 6, 7 and 8 of the Services Directive, Articles 57 and 57a of the Professional Qualifications Directive and Article 6 of the eIDAS Regulation as adapted to the EEA Agreement by Protocol 1 thereto.

¹ Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market, OJ L 376, 27.12.2006, p. 36.

² Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, OJ L 255, 30.9.2005, p. 22, as amended by Directive 2013/55/EU of the European Parliament and of the Council of 20 November 2013 amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation (EU) No 1024/2012 on administrative cooperation through the Internal Market Information System (‘the IMI Regulation’), OJ L 354, 28.12.2013, p. 132.

³ The reports were published on the website of the European Commission at the time, but are not anymore available.

⁴ Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, OJ L 257, 28.8.2014, p. 73.

⁵ For a complete list of correspondence, see at point 1 of the letter of formal notice (Doc No 1334629).

The Icelandic Government replied by a letter dated 30 June 2023 (your ref: HVIN23050162/3.26; Doc No 1384519) in which it acknowledged that there is work to be done in the organisation of the PSC in Iceland, in particular, as to the lack of availability and accessibility of information concerning recognition of professional qualifications.

Accordingly, an internal decision had been taken that the island.is website would become the PSC in Iceland. The site was still in development and would require additional time and financial resources to meet all the necessary requirements. Therefore, the relevant ministries fully acknowledged that it would be important for the Icelandic Government to establish a comprehensive plan and a timetable for actions to fully comply with both the Services Directive and the PQD. Furthermore, it would be beneficial to align these efforts with the necessary actions to implement the EU Single Digital Gateway.

In that same letter, the Government also informed the Authority that, in order to coordinate the necessary efforts, the Icelandic ministries have formed an inter-ministerial working group with participation from the Ministry of Higher Education, Science and Innovations, the Ministry of Finance and Economic Affairs, the Ministry of Culture and Business Affairs and Digital Iceland⁶, which operates the island.is website. The aim would be to have Iceland fully comply with the obligations laid down in the Services Directive and the PQD in early 2025. The exact time plan for the working group had not yet been finalised.

A comprehensive plan including a timetable for action to fully comply with the obligations identified in the letter of formal notice has, however, never been communicated to the Authority.

By a letter dated 16 April 2024 (your ref: HVIN23110057; Doc No 1501608), the Icelandic Government informed the Authority about steps it has taken to amend the access to information on recognition of professional qualifications in Iceland. The website island.is could already be found as a single page which would lead to information and processes for the recognition of professional qualifications. For some professions, there would already be full and complete online recognitions available. The general aim would be to work towards all processes being online by the end of 2025.

At the package meeting of 6-8 May 2025 (see follow-up letter of the Authority, Doc No 1535591), the Icelandic Government confirmed that island.is would indeed be the Icelandic PSC and all information and procedures could be accessed on or via this portal. The Authority, however, raised the awareness of the Icelandic Government that no Icelandic website is indicated when searching a PSC for Iceland through the “Your Europe portal” or “EUGo portal”, which are the starting points provided by the European Commission for all EEA States for service providers to seek for information about a potential new host state. Consequently, at the time of the package meeting, it was still not possible for a foreign service provider to clearly identify island.is as the Icelandic PSC.

Furthermore, when the Icelandic Government presented to the Authority the PSC live on screen during the package meeting, the relevant information concerning professional qualifications could be found on island.is under the tab “public services”, following the link to “Education” and subsequently selecting the link “Professional licenses and education for professional qualifications”. There, all regulated professions that exist in Iceland (listed in form of a drop-down menu) and information about recognition of professional qualifications would be available as well as the entry points for the electronic (recognition) procedures. The page regarding the recognition process would be further linked to the ENIC/NARIC website, which is the organisation responsible for professional recognition in Iceland.

The Authority commented at the meeting that this information seems to be “too hidden” to be considered “easily accessible” for foreign service providers, as required by the Services Directive and the PQD. The tabs would not necessarily relate to recognition of foreign qualifications but rather to accessing professional education in Iceland. The PSC should be clear as to where a service provider has to look for the relevant information so that the service provider does not need to look for it with trial-and-error searches on the website.

⁶ Ministries as named at the material time.

Moreover, it seemed that there was still no information specifically about temporary and occasional cross-border service provision into Iceland, in particular, the list of professions for which a prior check of qualifications can be applied under Article 7(4) of the PQD seems to be missing completely. This implies that still no description existed for the differences of permanent and occasional cross-border service provisions under either the Services Directive or the PQD.

The Authority also stated at the package meeting that electronic procedures for applications seemed to be in place, and that the electronic identification through eIDs would not be pursued anymore under the present case, but looked into when assessing the application of the Single Digital Gateway Regulation in the EEA EFTA States, as it is done by the European Commission for the EU Member States, after it has entered into force in the EEA.

To summarise, although the Icelandic Government has made progress in setting up the Icelandic PSC, there is still relevant information missing on island.is. This is the main aspect addressed in this reasoned opinion and maintained from the letter of formal notice. The other aspects that were addressed under points 4.3 and 4.4 of the letter of formal notice are, accordingly, not being pursued further.

2 Relevant national law

Article 4(1) of the Icelandic Act No 76/2011 on services in the internal market of the European Economic Area transposes Article 6 of the Services Directive. Article 6 of the Icelandic Act No 76/2011 on services in the internal market of the European Economic Area⁷ transposes Article 7 of the Services Directive.

As to professional qualifications, it seems that, in accordance with the respective tables of correspondence received by Iceland for the implementation of Directive 2005/36/EC (Doc No 600851) and Directive 2013/55/EU (Doc No 1156444), Articles 57 of the PQD has not been transposed into national law in Iceland.⁸

3 Relevant EEA law

Directive 2006/123/EC on services in the internal market establishes a general legal framework aimed at facilitating the exercise of the freedom of establishment for service providers and the free movement of services, while maintaining a high quality of services.⁹

The Services Directive lays down provisions concerning the right of service providers (as well as recipients) to information (Article 7) and the right of service providers to complete procedures for applying by electronic means for a license to provide services (Articles 6 and 8). According to those provisions, both information and e-procedures are to be made accessible and available to service providers through a PSC.

The service providers should be able, online and through the points of single contact, in relation to their service activities (both as established or establishing providers), domestically¹⁰ and cross-border, as well as providing or seeking to provide cross-border services temporarily and occasionally, to:

⁷ Lög nr. 76/2011 um þjónustuviðskipti á innri markaði Evrópska efnahagssvæðisins.

⁸ The complete implementation of Directive 2005/36/EC, as amended, is scrutinised by the Authority in a separate conformity assessment case (Case No 89498).

⁹ See Article 1 of the Services Directive.

¹⁰ On the application of provisions of the Services Directive regarding establishment to purely national situations see CJEU judgment of 30 January 2018 in joined cases C-360/15 and C-31/16 *Visser*, of January 2018 (point 3 of the operative part) – in those specific court cases regarding Chapter III of the Services Directive.

- obtain all relevant information on applicable rules for access to and exercise of service activities,
- complete all procedures and formalities needed for access to and exercise of service activities,
- receive assistance from competent authorities, consisting in information on the way in which the specific requirements are generally interpreted and applied.

The PQD establishes rules according to which an EEA State, which makes access to or pursuit of a regulated profession in its territory contingent upon possession of a specific professional qualification is to recognise professional qualifications obtained in another Member State and which allow the holder of the said qualifications to access and pursue the same profession in that Member State.

The PQD, notably since the modification by Directive 2013/55/EU, clarifies in its Articles 57 and 57a that the rules of Articles 6, 7 and 8 of the Services Directive already cover information requirements and electronic procedures concerning the recognition of professional qualifications. It thus complements the Services Directive by requiring specific information which EEA States shall ensure is available and it extends the obligations of the Services Directive to professions not covered by the Services Directive, like health professions, as well as to recognition procedures for employees. Together those two legal instruments therefore cover all information requirements and procedures necessary for access to and exercise of service activities in their scope, whether they concern (regulated) service activities by self-employed or the exercise of a regulated profession by employees.

For the purposes of this reasoned opinion, only Articles 6 and 7 of the Services Directive and Article 57 of the Professional Qualifications Directive remain relevant. As explained above, the case is not being pursued any further with regards to the technical aspects set out in Article 8 of the Services Directive, Article 57a of the Professional Qualifications Directive and Article 6 of the eIDAS Regulation.

Article 6 of the Services Directive reads:

Points of single contact

1. Member States shall ensure that it is possible for providers to complete the following procedures and formalities through points of single contact:

(a) all procedures and formalities needed for access to his service activities, in particular, all declarations, notifications or applications necessary for authorisation from the competent authorities, including applications for inclusion in a register, a roll or a database, or for registration with a professional body or association;

(b) any applications for authorisation needed to exercise his service activities.

2. The establishment of points of single contact shall be without prejudice to the allocation of functions and powers among the authorities within national systems.

Article 7 of the Services Directive reads:

Right to information

1. Member States shall ensure that the following information is easily accessible to providers and recipients through the points of single contact:

- (a) requirements applicable to providers established in their territory, in particular those requirements concerning the procedures and formalities to be completed in order to access and to exercise service activities;
- (b) the contact details of the competent authorities enabling the latter to be contacted directly, including the details of those authorities responsible for matters concerning the exercise of service activities;
- (c) the means of, and conditions for, accessing public registers and databases on providers and services;
- (d) the means of redress which are generally available in the event of dispute between the competent authorities and the provider or the recipient, or between a provider and a recipient or between providers;
- (e) the contact details of the associations or organisations, other than the competent authorities, from which providers or recipients may obtain practical assistance.

2. Member States shall ensure that it is possible for providers and recipients to receive, at their request, assistance from the competent authorities, consisting in information on the way in which the requirements referred to in point (a) of paragraph 1 are generally interpreted and applied. Where appropriate, such advice shall include a simple step-by-step guide. The information shall be provided in plain and intelligible language.

3. Member States shall ensure that the information and assistance referred to in paragraphs 1 and 2 are provided in a clear and unambiguous manner, that they are easily accessible at a distance and by electronic means and that they are kept up to date.

[...].

Article 57 of the Professional Qualifications Directive reads:

Central online access to information

1. Member States shall ensure that the following information is available online through the points of single contact, referred to in Article 6 of Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market, and regularly updated:

- (a) a list of all regulated professions in the Member State including contact details of the competent authorities for each regulated profession and the assistance centres referred to in Article 57b;
- (b) a list of the professions for which a European Professional Card is available, the functioning of that Card, including all related fees to be paid by professionals, and the competent authorities for issuing that Card;
- (c) a list of all professions for which the Member State applies Article 7(4) under national laws, regulations and administrative provisions;
- (d) a list of regulated education and training, and training with a special structure, referred to in point (c)(ii) of Article 11;

(e) *the requirements and procedures referred to in Articles 7, 50, 51 and 53 for the professions regulated in the Member State, including all related fees to be paid by citizens and documents to be submitted by citizens to competent authorities;*

(f) *details on how to appeal, under national laws, regulations and administrative provisions, decisions of competent authorities adopted under this Directive.*

2. *Member States shall ensure that the information referred to in paragraph 1 is provided in a clear and comprehensive way for users, that it is easily accessible remotely and by electronic means and that it is kept up to date.*

[...].

4 The Authority's Assessment

4.1 Organisation of the PSC in Iceland

The obligation laid down in the Services Directive concerning the establishment and maintenance of the PSC is an obligation of result. It provides, in line with its Article 6(2), the EEA States with flexibility, notably to choose the organisational set-up of the PSC that best suits their administrative organisation and already existing e-government structures. The PSC has an important role to play in facilitating the access to service activities, including services provided by professionals, and the exercise thereof in the internal market.

In the letter of formal notice, the primary question was, which website Iceland would consider as its PSC.¹¹ This aspect has been clarified by the Icelandic Government by confirming to the Authority that island.is is considered to be the Icelandic PSC. Nevertheless, as pointed out in the letter of formal notice, the information provided on or through that website and on the decentralised websites is not considered sufficient to fulfil the substantive requirements set out in Articles 7 of the Services Directive and Article 57 of the PQD for the following reasons.

Since the Services Directive does not require that a new or separate website needs to be created as PSC, many EEA States use existing national service portals for their own citizens. However, as pointed out in the letter of formal notice, the Services Directive, in particular as described in the Handbook on the implementation of the Services Directive issued by the European Commission ("the Handbook"), and with which the Authority concurs, requires for the provider to be able to easily identify the relevant PSC.¹² For this purpose, the portal "EUGo" has been created by the European Commission, which provides links to all PSCs in the EEA. Equally, the "Your Europe Portal" – the access portal of the Single Digital Gateway – contains such a list. However, in none of those portals, can island.is be identified as the PSC of Iceland, which in the Authority's view amounts to the Icelandic PSC not having been fully set up in order to be available for potential users.

This failure of clearly identifying the PSC to potential users – primarily cross-border service providers – was again explicitly pointed out by the Authority to the Icelandic Government at the package meeting in May 2025. Moreover, in the follow-up letter to the meeting, the Authority provided the Icelandic Government with the necessary contacts in the European Commission (DG GROW) to add island.is to the above-mentioned portals.

¹¹ Complementary to this, the substantive assessment made was based on the assumption that island.is was to be considered the Icelandic PSC.

¹² See Handbook on the Implementation of the Services Directive: <https://op.europa.eu/en/publication-detail/-/publication/60e2d020-6c6f-11ed-9887-01aa75ed71a1>, point 4.1, page 28 (new edition of December 2022).

In light of the above, foreign service providers would not be able to identify [island.is](#) as the PSC for Iceland, and Iceland continues to fail to reach effectively the result of establishing a point of single contact as required under Article 6(2) of the Services Directive.

4.2 Assessment of the availability and quality of information through the Icelandic PSC

In the following, it shall be assessed, whether the information [island.is](#) contains or websites it directs to, is sufficiently easily accessible and fulfils the substantive requirements set out in Article 7 of the Service Directive and Article 57 of the PQD.

According to Article 7 of the Services Directive,

- (i) the information on applicable requirements,
- (ii) the contact details of the competent authorities,
- (iii) the means of, and conditions for, accessing public registers and databases on providers and services,
- (iv) the generally available means of redress and
- (v) the contact details of the associations or organisations, other than the competent authorities from which providers or recipients may obtain practical assistance,

should be provided in a clear and unambiguous manner and be easily accessible at a distance and by electronic means to providers and recipients through the PSC. The information should be kept up to date.

Article 57(1) of the PQD complements the Services Directive by extending the obligations of Article 7 of the Services Directive to professions outside the scope of the Services Directive, like health professions, as well as to recognition procedures for employees.

4.2.1 Accessibility of information related to foreign service providers

The Authority considers that the obligation laid down in Article 7(1) of the Services Directive – requiring that information should be easily accessible – means that such information must be available directly on the PSC website or that the PSC website must clearly direct users to the relevant external webpage (for example, that of the competent authority) where the information is published. Article 7(3) further requires that the information and assistance referred to in paragraphs 1 and 2 of Article 7 be provided in a clear and unambiguous manner, ensuring that they are easily accessible remotely and by electronic means, and that they are kept up to date. These obligations also apply to Article 57(1) and (2) of the PQD.

At first sight, [island.is](#) appears to be a website primarily aimed at Icelandic citizens seeking information on domestic public services. It is only when searching further that certain information relevant to foreign service providers can be found. For example, as explained by the Icelandic Government at the package meeting in May 2025, information concerning professional qualifications can be located on [island.is](#) under the tab “Education”, by following the link to “Assessment of Education” and subsequently selecting “License for a regulated profession”. According to the Government’s explanations, this section contains a list – presented as a drop-down menu – of all regulated professions in Iceland, along with information on recognition requirements and access points for the electronic recognition procedures. Under some of the tabs concerning individual professions, links to the ENIC/NARIC¹³ website are provided, which is the actual starting point for the electronic application process for recognition in Iceland.

¹³ Which is the organisation responsible for professional recognition in Iceland.

In the view of the Authority, the information described above is too difficult to locate to meet the requirement of being “easily accessible” for foreign service providers under both the Services Directive and the Professional Qualification Directive. First, the naming of the relevant links does not clearly indicate where information about the recognition of foreign qualifications can be found; instead, the wording suggests that the links relate to accessing professional education in Iceland. Second, the relevant information becomes visible only at the third sub-level, as a minimum, after entering island.is, which requires considerable time and effort to uncover. However, the PSC must clearly indicate where a service provider can find the relevant information, so that they do not have to navigate through multiple links or rely on trial-and-error searches on the website to locate the applicable rules and procedures.

Most of the information required under Article 7(1) of the Services Directive and Article 57 of the Professional Qualifications Directive can only be located through the general search function on the island.is website, which provides unclear results (see follow-up letter of the package meeting in 2023 (Doc No 1379175, page 4, first paragraph). In particular, this concerns information about:

- (i) requirements to be met to provide services in Iceland (Article 7(1)(a));
- (ii) the means of, and conditions for, accessing public registers and databases on providers and services (Article 7(1)(c));
- (iii) the means of redress generally available in the event of disputes between the competent authorities and the provider or the recipient, or between a provider and a recipient, or between providers (Article 7(1)(d)); and
- (iv) the contact details of the associations or organisations, other than the competent authorities, from which providers or recipients may obtain practical assistance (Article 7(1)(e)).

Moreover, at the package meeting, the Icelandic Government confirmed that there was still no information available on the specific requirements applicable to the temporary and occasional cross-border provision of services into Iceland, including the substantive and procedural information requirements as set out in Article 7(1) of the Services Directive.

In the light of the above, by failing to ensure that the information and assistance referred to in paragraphs 1 and 2 of Article 7 of the Services Directive and Article 57(1) of the PQD are provided in a clear and unambiguous manner, are easily accessible at a distance and by electronic means, and are kept up to date, Iceland fails to fulfil its obligations arising from Article 7(3) of the Services Directive and Article 57(2) of the PQD.

4.2.2. Lack of specific information required under the Professional Qualifications Directive

Article 57(1) of the PQD specifically sets out certain information that Member States must make available. This includes, in particular:

- (a) a list of all regulated professions including contact details of the competent authorities for each regulated profession and the assistance centres referred to in Article 57b;
- (b) a list of the professions for which a European Professional Card is available, the functioning of that Card, including all related fees to be paid by professionals, and the competent authorities for issuing that Card;
- (c) a list of all professions for which the relevant State applies Article 7(4) under national laws, regulations and administrative provisions;
- (d) a list of regulated education and training, and training with a special structure, referred to in point (c)(ii) of Article 11;
- (e) the requirements and procedures referred to in Articles 7, 50, 51 and 53 for the professions regulated in the relevant State, including all related fees to be paid

- by citizens and documents to be submitted by citizens to competent authorities;
and
- (f) details on how to appeal, under national laws, regulations and administrative provisions, decisions of competent authorities adopted under this Directive.

At the package meeting in May 2025, the Icelandic Government explained that the relevant information concerning professional qualifications could be found on island.is under the tab “public services”, by following the link to “Education” and subsequently selecting the link “Professional licenses and education for professional qualifications”. According to the Government, this section contains a drop-down list of all regulated professions in Iceland, along with information about recognition requirements and the entry points for the electronic recognition procedures.

However, when comparing the list of regulated professions on island.is with the European Commission’s regulated professions database, many professions are missing from that list, in particular all health professions. In addition, island.is does not provide links to the relevant national competent authorities where this information could otherwise be found. Therefore, the requirements set out in Article 57(1)(a) of the PQD are not sufficiently reflected on island.is.

The Authority was furthermore unable to identify any of the additional information requirements set out in letters (b) to (f) in Article 57(1) of the PQD on island.is. This absence of information was confirmed by the Icelandic Government at the package meeting in May 2025. Therefore, the information required by Article 57(1) of the PQD is not sufficiently available on, or accessible via, island.is.

In the light of the above, by not ensuring that the information referred to in paragraphs 1 of Article 57 of the PQD is provided, Iceland fails to fulfil its obligations arising from Article 57(1) of the PQD.

FOR THESE REASONS,

THE EFTA SURVEILLANCE AUTHORITY,

pursuant to the first paragraph of Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice, and after having given Iceland the opportunity of submitting its observations,

HEREBY DELIVERS THE FOLLOWING REASONED OPINION

that by

- not having *fully* set up a single entry-point website as PSC in Iceland serving as interlocutor of websites of national authorities for the purpose of the Services Directive and Professional Qualifications Directive (as concluded at point 4.1 above),
and in any event, by
- not providing the relevant information and assistance as required by the Services Directive available on or through the PSC (as concluded at point 4.2.1 above),
- not providing specific information as required by the Professional Qualifications Directive on or through the PSC (as concluded at points 4.2.1 and 4.2.2 above),

Iceland has failed to fulfil its obligations arising from Articles 6(2) and 7(1)(2) and (3) of the Services Directive and Article 57(1) and (2) of the Professional Qualifications Directive as adapted to the EEA Agreement by Protocol 1 thereto.

Pursuant to the second paragraph of Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice, the EFTA Surveillance Authority requires Iceland to take the measures necessary to comply with this reasoned opinion within *two months* of its receipt.

Done at Brussels,

For the EFTA Surveillance Authority,

For Arne Røksund
President

Árni Páll Arnason
College Member

Nuscha Wieczorek
Responsible College Member

For Melpo-Menie Joséphidès
Countersigning as Director,
Legal and Executive Affairs

This document has been electronically authenticated by Arni Pall Arnason, Sigrun Ingibjorg Gisladdottir.