



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR JUSTICE AND CONSUMERS

Directorate A: Civil and commercial justice
Unit A.2: Civil justice

MINUTES

FIFTH JOINT MEETING OF THE TAKING OF EVIDENCE STEERING COMMITTEE AND THE SERVICE OF DOCUMENTS STEERING COMMITTEE

20 November 2025

I. WELCOME AND INTRODUCTORY REMARKS

The Commission welcomed everyone and introduced the Commission members joining this meeting. The Commission presented the agenda, and the Committee adopted the agenda.

The 19th Member State which recently launched in production was welcomed.

II. MEMBER STATES' DEPLOYMENT AND GO-LIVE STATUS UPDATE

Each Member State provided an update on their deployment and go-live status, sharing the potential issues that they are facing.

Currently, 19 Member States are in production:

- 12 Member States have all authorities live
- 7 Member States have some authorities live
- 8 Member States don't have any authorities live
- 23 e-CODEX access points (maintained by eu-LISA).

Each of the present Member States provided an overview of their deployment status and shared information on any issues. In addition, the representatives of the Member States were requested to provide statistics on the total number of users in the SoD&ToE production environments and the number of requests dealt with since the Member State went live, including Service of Documents and Taking of Evidence requests sent and received. The Commission seeks to understand the traffic volume in each Member State.

During the last Steering Committee meeting, it was noted that Member States continue to receive requests outside the system from Member States that are supposed to use the decentralised IT system. The Commission has received some statistics from the e-Justice Portal regarding the number of generated forms under both instruments – the amounts haven't changed significantly compared to pre-go-live numbers. However, the Commission had expected that the usage of forms on the e-Justice Portal would decrease after the system went live, but this has not been the case yet. This suggests that many cases are still being sent via other means. The Commission would like to gain a better understanding of the extent to which the system is being utilized.

Some Committee members provided their statistics directly, while others indicated that they require internal alignment to obtain information on the number of users and cases exchanged. Based on the info reported during the meeting on the amount of messages exchanged in the decentralised IT system and users of the system and they account to over 32 000 messages and around 30 000 users. Presumably this represents around 25-30% of the total usage of the system when all MS and all Authorities will be connected. Committee members were asked to share further statistics after the meeting.

One Committee member brought to attention an issue with cases containing diacritical characters in the names of attachments or downloaded files, which was initially identified as a potential problem with the use of UTF-8 and its transmission within the HTTP protocol, particularly in headers. Additionally, another issue was raised with the Support Team regarding the character limit in SoD Form A, point 5.2, which was deemed too short to provide an accurate explanation. In response, the Commission stated that the first issue was reported recently and requires further analysis, which will be conducted in due time. Regarding the second point, the Commission considered it a change request rather than a bug. The request has been logged for potential future consideration but will require additional effort. The Member State will be informed of the outcome of the analysis in due course.

Another Committee member inquired about the feasibility of launching the production environment when not all authorities are live. The Commission responded that it is possible to enable a subset of authorities by configuring the necessary data at the CDB level. The Commission proposed that the Support Team could provide the Member State with detailed instructions and assistance during a dedicated technical session to facilitate this process. However, Member States were cautioned against using this solution as it causes confusion within the users of the system who have difficulties in understanding which authorities are using the system and which are not.

III. PRESENTATION OF GERMANY REGARDING THE IMPLEMENTATION AND USE OF THE REFERENCE IMPLEMENTATION

A representative from Germany presented an overview of the national implementation of the Reference Implementation (RI), including lessons learnt and potential areas for future improvement.

The project kicked-off on 7 May 2024 after the Commission had released the minimum-viable-product of the RI, and Germany was able to go live on 1 May 2025, within approximately one year.

Germany presented a project schedule plan, which consisted of the following phases:

- demo version available – Acceptance instance,
- CDB validation,
- conformance tests,
- production-ready,
- go-live.

The production environment was made available later than initially planned, and the validation process in the CDB proved to be more complex than anticipated. As a result, the process was not completed until March 2025. Consequently, it was not possible to initiate proper user management and training earlier, which left the Member State with limited time to fully prepare.

The statistics have been presented:

- number of authorities to be connected - 979,
- number of local administrators trained – over 650,
- number of training sessions – around 100 to 54 German master trainers,
- number of registered users – over 7500,
- number of administrators – around 1000,
- number of update meetings - 8,
- number of informative discussions – over 150,
- number of handouts/manuals - 5,
- number of support mails in final phase – around 1500,
- number of technical sessions with the Commission – 75.

The national users encountered several challenges. Many court employees, who were not familiar with IT, were hesitant to use the system due to concerns about making mistakes. Additionally, the system's performance was initially insufficient and didn't cover all national workflows. There were some difficulties with user management, ticketing and national support structures. Although the performance issues have since been resolved, some tickets were submitted to the Commission. Despite these challenges, the team believes things are moving in the right direction. Initially, there was a plan to provide all users with access to the acceptance environment for testing purposes. However, it was later realized that the acceptance and production environments are two distinct systems, resulting in a large number of requests and some mistakes. Currently, national support structures are being established to mirror Germany's federal structure.

As for the lessons learnt, the primary challenges on national level were related to:

- limited connection to test environment,
- communication with users,
- federal structure and distribution of responsibilities,
- clarifying the responsibilities in training system.

Germany expressed appreciation for the ticketing system, although there were some delays in resolving issues. The importance of communication with other Member States and weekly Technical Sub-committee meetings was highlighted as effective in addressing challenges. The ability to discuss issues with other Member States and having a comprehensive list of contact points in other Member States was also deemed valuable. Over the past few months, communication has been enhanced. To further improve the process, Germany suggested that practitioners using the RI should be immediately notified if another Member State is temporarily unavailable, as emails sent to national points of contact often do not reach the actual users. At the national level, Germany is still in the process of learning and refining its approach, with access to the acceptance environment currently limited to a small number of individuals. Efforts are being made to improve communication with users and coordination is in place. Additionally, Germany is considering establishing a national Steering Committee to support the implementation of the RI.

The Commission expressed appreciation for the presentation and acknowledged the valuable contribution of the Support Team. The Commission inquired about the proposed improvements to the ticketing system, and the German representative explained that there were delays in case handling due to technical constraints, specifically related to the resolution point of view in ticketing. The Commission also asked about the test environment being unavailable and whether announcing it during the weekly meeting was sufficient or if alternative communication methods should be used. The German representative responded that ideally, users should be able to immediately see when another Member State is unavailable for a certain period. The current methods of distributing this information, such as via email or during weekly meetings, were deemed ineffective as they do not reach practitioners directly.

IV. CHANGE MANAGEMENT PROCESS

It was recalled that a presentation on the change management process was given at the previous Steering Committee meeting, during which questions and comments were raised, all of which have been incorporated into the meeting minutes. The purpose of revisiting this topic was to provide a comprehensive overview of the process for handling change requests. The change management process is expected to consist of three main stages:

- the submission of the change request (Support Team),
- phase in which a change request is accepted and prioritized,
- development, testing and release.

The Commission will conduct a high-level analysis and assessment, which will enable the proper ranking of change requests. Where feasible, an impact analysis will also be provided. Following this, the development, testing, and release of the changes will be communicated to the relevant stakeholders, ensuring transparency and clarity throughout the process.

V. UPDATE OF PLANNED CHANGE REQUEST / IMPROVEMENTS (EFFORTS, PLANNING, RELEASE DATES)

The seventeen improvements ranked by the Member States were presented, and an update was provided on the status of each item. Specifically, the issues of file extensions and maximum file size were discussed during the meeting. It was noted that several improvements have been scheduled for Release 4.1, while others are planned for Release 4.0. Additionally, some items are currently under analysis by the Commission, and further discussion with the Member States is required for other improvements to move forward.

One Committee member requested clarification on the systematization in the Excel table, noting that the priority ranking by some Member States did not seem to be included in the total calculation, and that non-responding Member States were counted as 0. The Commission acknowledged that there seems to have been a mistake in the calculations but noted that the differences in the individual rankings did not seem significant. They also expressed openness to discussing alternative methodologies for making the ranking more transparent and accurate, particularly when some Member States had not responded.

Another Committee member inquired about the status of the electronic signature module and a newly submitted request, as well as its prioritization. The Commission replied that the signing module required further business, technical, and security analysis, as well as alignment within the Commission. They also mentioned that the new change request would be presented later.

A Committee member proposed enhancing the ranking method by calculating the average of all votes and dividing it by the number of Member States that voted, which would be more accurate when some Member States using national implementation (NI) omit answering to particular points. The Commission suggested that two columns, 'Total score' and 'Average', could be used to compare the results and make the prioritization process easier.

The Commission then presented an overview of the planning for the next two releases, emphasizing the need for synchronization in updating protocols among all Member States. A technical meeting was proposed to discuss this further.

The Commission presented the most important blocking issues reported recently:

- FinalRecipient, reported as blocking issue by one Member State. The Commission does not consider it as an issue, but as a change request. Nevertheless, its implementation will be ready for the next major release 4.0 as it is necessary for the e-Evidence release.
- Vulnerability issue reported blocking by another Member State. Also addressed, fixed and ready for release 4.0. (February 2026).

One Committee member expressed concern that converging the CDB and synchronizing all Member States simultaneously might be a challenging task, suggesting that it could be divided into phases to make it more manageable. The Commission responded that the necessary features would be available in Release 4.0, but not all of them will be immediately activated. Activation of FinalRecipient will require coordination, as all Member States must activate the functionality at

the same time. A proposed plan will be presented and discussed with the Member States in the Steering Committee on 29 January 2026, to ensure a smooth implementation.

Another Committee member requested a technical meeting to discuss what are the nature of changes to be applied in the RI that will require a coordinated deployment between all Member States for Release 4.0. and whether this can be implemented faster. The Commission agreed to organise such a meeting and some other Committee members and an observer were interested to participate.

The Commission presented the change requests that had been submitted over the past two months, providing an update on the latest development. These requests will be presented in the next technical meetings and in the 6th Steering Committee meeting on 9 December 2025.

Furthermore, the Commission summarized the actions that had taken place since the 4th Steering Committee meeting, highlighting the progress made and the steps taken to address the various issues and requests raised by the Member States.

- 4 out of 5 topics presented in the previous discussion paper have been discussed and clarified
- Communication regarding the Certificates has been made on the Technical Sub-Committee meeting
- Hotfix 3.2.5. was released recently to made section 1.3 Form K of SoD non-mandatory (defined by the Member States as a blocking issue).

The Commission presented a discussion paper, which had been distributed to the Steering Committee members prior to the meeting, with the aim of clarifying the key open points that had emerged during the preliminary analysis of maximum file size and file extensions included in the EUSurvey. The purpose of the document was to facilitate a discussion with the Steering Committee on these topics and gather feedback on preferable solution elements, including various options. It was noted that some of the questions and issues raised may require further, more in-depth decision-making, and could potentially be referred to the Technical Sub-Committee for additional consideration.

(1) Max file size.

The current Reference Implementation (RI) does not impose any restrictions on file size. This presents a challenge, as file sizes can differ between the sender and recipient. To ensure that messages and attachments are transmitted without issues, they must align with the file size criteria of both parties.

It is essential to keep in mind that a message includes the following components:

- *Main document: this can be either a PAdES method (PDF) signature, or a user-specified signature in any format;*
- *Message and form XML;*
- *Attachments;*

- *Token files (visible only on the recipient's side).*

The size of these components collectively impacts the overall size of the message to be sent.

a. Proposed solution 1:

Implementing a common validation for every Member State in the RI, considering the limitations of each component of the RI architecture and impose a limit of a maximum of 25 MB for each message. If this solution is applied, the RI will not allow a user to send a message that exceeds the limit. Moreover, the RI will not accept any incoming message which exceed the limit.

National Implementation (NI) would need to apply and adjust the limits accordingly on their sides.

Impact: *RI and NIs; it is mandatory for the NI to adapt similar business logic when sending and receiving messages.*

Affected components:

- *RI front-end;*
- *RI back-end;*
- *NI front-end;*
- *NI back-end.*

Pros:

- *The limit is clear for every user - no need to check extra sources;*
- *No problem with forwarding cases - one unified limit ensures that users can forward cases to the responsible authority without hitting unexpected restrictions (lower limits);*
- *Fair and equal treatment - all Member States operate under the same conditions.*

Cons:

- *Longer implementation process compared to the solution no. 2;*
- *A more restrictive system - the strict limit makes the decentralised IT system less flexible.*

b. Proposed solution 2:

The RI will not impose any restriction (as it is now). COM will distribute a list with the maximum size for each Member State's implementation(s). Users will need to consult the referred list when they are preparing the request to adapt to specific limitations to ensure that the limit is not exceeded for each message sent. In the RI, a generic reminder could be added to prompt the user to check whether the limit has been exceeded.

Impact: *RI and NI; it is recommended for the NI to implement similar business logic when sending and receiving messages.*

Affected components:

- *RI front-end;*
- *RI back-end;*
- *NI front-end;*
- *NI back-end.*

Pros:

- *Greater flexibility for both sides - users can adapt to restrictions applied to Member States involved in each particular case - the RI does not prevent sending a case. It should, still however, be remembered that there are e-CODEX Connector limits;*
- *Easier and faster to implement compared to solution no. 1,*

Cons:

- *Risk of exceeding the limits with large files - the RI allows sending above the recipient's indicated limits, extremely large files may be sent, potentially causing performance issues;*
- *Dependence on user discipline - the solution works only if all parties respect the agreement;*
- *Potential issues with forwarding cases - if different installations/stacks have different limits, forwarding cases may be blocked unexpectedly.*

The Steering Committee is kindly asked which solution should be implemented?

Almost all Committee members agreed that introducing a horizontal limit (unique file size limit) on maximum file size (option 1) was necessary, with many expressing concerns that the proposed 25 MB limit was insufficient and proposed between 70 and 100 MB. The Commission requested that eu-LISA conduct a test of the e-CODEX Connector capacity, based on the usage patterns detected so far, to validate whether this limit could be enhanced.

It was noted that, regardless of the specific limit chosen, a decision would need to be made on how to handle files that exceed the limit, including how to present this to the user. The discussion paper referred to the total size of the message, and it was highlighted that the current total traffic in the RI is expected to increase significantly, potentially reaching four times its current level within the next year. The Steering Committee decided that the Technical Sub-Committee should continue the discussions on maximum file size strategies and report back at the next meeting of 9 December 2025.

(2) File extensions.

Since the topic of max file size consumed most of the discussion in the 4th Steering Committee meeting, we propose to separate the two features and discuss them in separate blocks.

The purpose of this feature is to protect Member States' authorities from receiving files they do not wish to receive. The proposed change aims to establish uniform file type restrictions for all Member States, rather than maintaining the current situation where each implementation applies its own limitations. It is important to highlight that the only format that it is allowed by all implementations is standard PDF, with limitations in some cases to PDF/A. Other formats commonly accepted are DOC/DOCX (in 55% of implementations), XLS/XLSX (42% of implementations) and TXT (40% of implementations).

Impact: RI and NI. The NI must implement similar business logic when sending and receiving messages.

Affected components:

- *RI front-end;*
- *RI back-end;*
- *NI front-end;*
- *NI back-end.*

The Steering Committee is kindly asked whether there the attachments that can be sent should be limited to only certain formats/file types? If 'yes', which formats/file types should be allowed for SoD and which for ToE?

Regarding the file extensions, no clear consensus was reached regarding the preferred approach. Two potential strategies were considered:

- **Whitelisting:** Both RI and National Implementation (NI) would permit only specific, approved file types.
- **Blacklisting:** These interfaces would accept all file types except those explicitly prohibited.

The Steering Committee decided that the Technical Sub-Committee should continue the discussions also on the file extensions and report back at the next meeting of 9 December 2025.

VI. PLANNING OF NEXT MEETINGS

The next meetings are planned online for 9 December 2025, 29 January 2026 and 11 March 2026.

The next planned steps for the next two weeks (before next Steering Committee of 9 December) are:

- Presentation by the Commission of the change requests in the Technical Sub-committee. These change requests will be also presented in the next Steering Committee.
- eu-LISA will provide information regarding Connector's capabilities in terms of max file size.
- As suggested by the Steering Committee, discuss with the Technical Sub-committee two open points: Maximum File Size and File Type.
- Technical meeting regarding the FinalRecipient changes that will be included in the next release (4.0).

VII. ANY OTHER BUSINESS

No other business was raised.

LIST OF PARTICIPANTS

Commission

Austria

Belgium

Bulgaria

Croatia

Czechia

Denmark

Finland

France

Germany

Greece

Hungary

Ireland

Italy

Lithuania

Luxemburg

Malta

Netherlands

Poland

Portugal

Romania

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