



The European Business Registry Association (EBRA), together with our peer organizations International Association of Commercial Administrators (IACA), Corporate Registers Forum (CRF) and ASORLAC, sought member feedback on the impact of the COVID-19 Pandemic on business registries. The response period was open from 8 March to 16 April 2021. We hereby present the received responses from our member jurisdictions.

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COVID-19 in your country

Like many jurisdictions, the pandemic implied a major change in habits, with the decree of the State of emergency, which entailed restrictions on the movement of people and the decision to close services to the public, including public services considered non-essential.

As a result, revenues from hotels and restaurants, and sales in general (of clothes, footwear, and even vehicles, for example) decreased. Unemployment increased, not only because of the impossibility of certain companies to continue to pay wages, for instance, but also because a lot of informal employment, such as household service, for example, ceased to be requested.

Only essential services were fully maintained running, like supermarkets, gas stations, and computer, technology and appliance stores.

Landlords were prohibited from evicting tenants for non-payment, and there was, in general, a reduction in store rents. State support was approved, for companies and for individual entrepreneurs, taking into account the previous year's revenue.

Impact of COVID-19 on workload and operations

During the pandemic crisis, despite all the existing limitations (suspension/limitation of circulation, interruption in the operation of numerous services, contact between people reduced to the minimum necessary level), the uninterrupted and efficient operation of the registry services, especially through the practice, whenever possible, of acts at a distance, in a dematerialized way, and in multiple access channels through the Internet, was a constant.

There were some significant changes on the procedures:

- *Face-to-face assistance has been provided only by prior appointment. The on-site service is maintained to the public with non-informative purposes, with the previous appointment by telephone or e-mail (limited to services not provided electronically and / or qualified as urgent)*
- *Citizen birth counters (counters of the civil registry in hospitals) where closed*
- *Adoption of alternative means of attendance to face-to-face services such as:*



- *E-mail and telephone, with the reinforcement of human resources allocated to telephone assistance and response to e-mails in each of the registration services – e.g. death registration requested by e-mail*
- *Increased use of online channels and creation of new online services: Online birth certificate (civil registration); Citizen card – Simplified renewal by SMS; Delivery by mail (via ctt).*

The volume of face-to-face assistance has decreased enormously, with the resources to online channels exponentially increasing.

A few statistics regarding the business register between April 2020 and March 2021:

- *Orders received by online channel: 23,423*
- *Orders received at the counter / post: 1,067*
- *Total number of companies incorporated:*
 - *2019 – 47,059*
 - *2020 – 36,519*
 - *On the spot firm – Face to face system to incorporate a company*
 - *2019 – 25,272*
 - *2020 – 12,403*
 - *Online company – Fully online procedure*
 - *2019 – 18,363*
 - *2020 – 23,128*
 - *Traditional method (with public deed) represented a small part of the number of the total company incorporations: only 7% in 2019 and 3% in 2020.*
- *SCAP processes: 10,369 (fully online service/without presence intervention) (SCAP is the certification of powers of companies management bodies, and it allows the practice of certain acts by online channels representing the companies).*

Reorganization measures

- *Assignment and availability of personal protective equipment: masks, visors, alcohol-gel, gloves without prejudice to their purchase by the services through working capital funds in urgent situations.*
- *Provision by the central services of protective suits, visor and FFP2 masks for the provision of external Citizen Card service by the central services*
- *Provision of central acrylic protection services for workstations*
- *Adoption of the teleworking regime whenever possible – total or partial (rotating in mirror mode).*

In order to reorganize the workplaces to guarantee minimum distance between workers and the reduction of the respective number of workers per space, it was recommended whenever possible, in relation to the specific functions exercised by the workers, to alternate the provision of face-to-face service in the form of rigid hours or another that has been practiced with the effective provision of telework / alternative form of remote work.

- *Assignment of portable computers and mobile phones to carry out teleworking as well as the rescheduling of acts / service.*
- *As a result of teleworking and restrictions on face-to-face service, reallocation of resources to back office work.*

Simplification of procedures



- *As an exceptional and temporary pandemic-response measure, provided that certain legal assumptions are met, the possibility of using, generally by any person or entity, e-mail was made available either for the formulation of civil registration requests, commercial and vehicle registrations that could not be done online through the competent websites, or for communications and notifications;*
- *Provision of an electronic platform designed to enable the issuing of bank references by registration services. FI @ sh No. 205/2020. allowing the submission of orders by mail / e-mail;*
- *An experimental regime was approved by the Council of Ministers for the realization of authentic acts, terms of authentication of private documents and recognition of signatures through the Internet;*
- *It is still possible to schedule online the incorporation of a company, as well as a wide range of other acts and procedures;*
- *Digital signature and autograph signature were allowed to be placed on the same document, with the same legal value.*

Impact of COVID-19 on development projects and strategy

There were some organizational projects that were postponed, like the merger of registry offices, for instance, and the implementation of the document management system in the central services. In addition, the update of the computer systems has been postponed, and several projects related with the beneficial owner register were delayed. However, we were able to implement the new Foundations Register.

In the pandemic context of COVID-19, technological advances, the computerization of data in digital support, and the availability and reinforcement of digital justice services, allowed to maintain efficiency and fluidity in work according to the needs of citizens, companies and our economy.

The “citizen's card”, our national identity document, is a document that, through its digital certificates, allows citizens to have a secure form of authentication before online public services. The fact that this is well implemented allowed access to all kind of services, without face-to-face interaction.

COVID-19 and companies

Other measures were taken to keep the registry offices functioning in a way that is compatible with the current context. We highlight:

- *the adoption of alternative forms of work, including teleworking, reinforcing the technological equipment in the registry offices and the technological equipment made available to workers;*
- *the face-to-face service to the public was maintained for non-informative purposes, with prior dialing by telephone or e-mail (limited to services not provided electronically and / or classified as urgent - example: marriage in article mortis; testament in article mortis)*



- *the deadlines for carrying out the procedural act in the field of registration processes and procedures were suspended twice until now, between 9 March and 3 June 2020, and 25 January and 6 April 6 2021;*
- *the Government has decreed that the Citizen Card (identification document), whose validity ends between 24 February 2020 and 31 December 2021 remain valid for all legal purposes and continue to be accepted, even after that date, until 31 December 2021, as long as the holder proves that it has already been scheduled the respective revalidation. All other certificates issued by the civil, commercial and land registry and identification offices (that includes the register certificates) that expired after 24 February 2020 had their validity extended until 31 December 2021;*
- *Companies were exempted from the annual confirmation of the beneficial owner information for the year of 2021;*
- *Credit debtors were exempted from payment for a certain period, and in cases where the extension of the credit term must be registered, registration has been simplified and is free of charge.*

The “New Normal”

The systems are now being reviewed, as IRN needs to progress in order to implement several interconnections between them, to upgrade the once-only principle.

Also, the possibility of making some provisional measures permanent is being studied, like the possibility of using, generally by any person or entity, e-mail for the formulation of civil registration requests, commercial and vehicle that could not be done online through the competent website; or the possibility of realization of authentic acts, terms of authentication of private documents and recognition of signatures through the Internet.