



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
Confederaziun svizra

**Bundeskanzlei BK**  
Sektion Politische Rechte

1 December 2021

---

# **Partial revision of the Ordinance on Political Rights and total revision of the FCh Ordinance on Electronic Voting (Redesign of Trials)**

## Report on the results of the consultation procedure

---

# **Table of Contents**

<b>1. Background .....</b>	<b>3</b>
<b>2. Consultation procedure .....</b>	<b>3</b>
2.1 Key points in the consultation draft .....	3
2.2 Conduct of the consultation procedure .....	4
<b>3. Evaluation of the consultation .....</b>	<b>5</b>
3.1 Overall evaluation .....	5
3.1.1 Summary .....	5
3.1.2 Cantons and communes.....	5
3.1.3 Political parties.....	8
3.1.4 Organisations.....	10
3.1.5 Individuals .....	14
3.2 Evaluation of the questionnaire.....	15
3.2.1 Evaluation of the questions .....	15
3.2.2 Evaluation of the discussion on individual articles in bill .....	18
<b>Anhang / Annexe / Allegato / Annex.....</b>	<b>25</b>

## **1. Background**

Electronic voting in Switzerland (e-voting) has been in a trial phase since 2004 and is part of the e-government strategy adopted by the Swiss Confederation and cantons. The legal basis for the trials is Article 8a of the Federal Act of 17 December 1976 on Political Rights (PRA; SR 161.1), Articles 27a-27q of the Ordinance of 24 May 1978 on Political Rights (PoRO; SR 161.11) and the Federal Chancellery (FCh) Ordinance of 13 December 2013 on Electronic Voting (OEV; SR 161.116). The principle for the project has remained, from the very beginning, 'security before speed'. In Switzerland, only e-voting systems which meet the high security requirements set in federal law are permitted.

Since 2004, 15 cantons have enacted related legal provisions at cantonal level and in over 300 trials have allowed some voters to vote online. In all cantons, Swiss citizens living abroad have been permitted to take part in the trials, and some cantons have allowed some of their resident voters to cast their vote electronically. Two online voting systems were available to the cantons in recent years: that of the Canton of Geneva and that of Swiss Post. As both of these providers withdrew their systems in mid-2019, e-voting is currently not available in Switzerland.

Following a consultation procedure on the revision of the PRA, the Federal Council decided on 26 June 2019 not to introduce e-voting as a standard voting method for the time being. At the same time, it instructed the FCh to work with the cantons to redesign e-voting trials,<sup>1</sup> setting the following objectives:

1. Further development of the systems
2. Effective control and oversight
3. Increasing transparency and trust
4. Closer cooperation with the academic community

Based on the final report of the 'Steering Committee Vote électronique' (SC VE) of 30 November 2020 on the redesign and relaunch of trials,<sup>2</sup> the Federal Council, at its meeting on 18 December 2020, instructed the FCh to work with the cantons to gradually implement the measures required for the redesign and to submit a bill for consultation containing the necessary amendments to the Ordinance on Political Rights (PoRO) and the FCh Ordinance on Electronic Voting (OEV).<sup>3</sup> The consultation procedure was opened on 28 April 2021.<sup>4</sup>

## **2. Consultation procedure**

### **2.1 Key points in the consultation draft**

In the SC VE's final report, the Confederation and the cantons have drawn up a range of measures for the redesign and relaunch of trials. With the implementation of these measures, the need for action identified in the four objectives set by the Federal Council will be met. The measures are to be implemented gradually. In an initial phase, measures to resume trials will be implemented. Small-scale trials will be resumed while work continues on implementing the medium to long-term objectives. According to initial estimates, the medium- to longer-term measures will be implemented within five years of the relaunch of trials.

The present bill for consultation provides for a partial revision of the PoRO and a total revision of the OEV and its annex. These amendments are the first stage in implementing the measures for the redesign of e-voting trials.

---

<sup>1</sup> Federal Council media release, 27 June 2019; available at [www.bk.admin.ch](http://www.bk.admin.ch) > Political rights > E-voting > Media releases.

<sup>2</sup> The final report and the complete documents on the dialog with the academic community are published on the FCh website: [www.bk.admin.ch](http://www.bk.admin.ch) > Political rights > E-voting.

<sup>3</sup> Federal Council media release dated 21 December 2020; [www.bk.admin.ch](http://www.bk.admin.ch) > Political rights > E-voting > Media releases.

<sup>4</sup> Federal Council media release dated 28 April 2021; available at [www.bk.admin.ch](http://www.bk.admin.ch) > Political rights > E-voting > Media releases.

The key points of the bill are:

- Continuation of trials
- Strengthening security
- Retention of the division of responsibilities between the Confederation and the cantons
- Strengthening independent examinations
- Increasing transparency, public involvement and cooperation with the academic community

In addition to the amendments within the scope of the redesign of e-voting trials, the consultation draft includes some updates to Section 3 and Annex 3a of the PoRO.

## 2.2 Conduct of the consultation procedure

The consultation procedure for the partial revision of the PoRO and the total revision of the OEV as part of the redesign of trial operations was opened by the Federal Council on 28 April 2021 and lasted until 18 August 2021. The cantons, the Conference of the Cantonal Governments (CCG), the political parties represented in the Federal Assembly, national umbrella organisations of communes, cities and mountain regions, national umbrella organisations for businesses and other interested parties were invited to participate.

	Invited	Submission received	Refrained from commenting in the response
<b>Cantons and communes</b>			
<i>Cantons</i>	26	25	1
<i>CCG</i>	1	0	0
<i>Communes</i>	0	1	0
<b>Political parties</b>			
<i>Represented in the Federal Assembly</i>	10	6	0
<i>Other parties</i>	0	2	0
<b>Organisations</b>			
<i>National umbrella organisations for communes, cities and mountain regions</i>	3	3	0
<i>National umbrella organisations for businesses</i>	8	2	1
<i>Other interested parties</i>	68	24	1
<b>Individuals</b>	0	4	0
<b>Total</b>	<b>116</b>	<b>67</b>	<b>3</b>

The submissions received were published on 31 August 2021.<sup>5</sup>

<sup>5</sup> Available at [www.admin.ch](http://www.admin.ch) > Bundesrecht > Vernehmlassungen > abgeschlossene Vernehmlassungen > 2021 > BK.

### 3. Evaluation of the consultation

#### 3.1 Overall evaluation

##### 3.1.1 Summary

With regard to e-voting and the redesign of trials, the consultation responses can be categorised as follows:

Support (with proposals for adaptation)	Fundamental reservations	Rejection	Refrained from commenting in the response
<b>Cantons and communes</b>			
21 <i>AG, AI, AR, BE, BL, BS, GE, GL, GR, LU, NW, OW, SG, SH, SO, TG, TI, UR, VD, ZG, ZH</i>	4 <i>FR, NE, VS, Lausanne</i>	1 <i>SZ</i>	1 <i>JU</i>
<b>Parties</b>			
2 <i>The Centre, FDP</i>	3 <i>SP, EDU, AL Bern</i>	3 <i>Greens, SVP, Pirate Party</i>	
<b>Organisations</b>			
22 <i>ASO, BFH, Centre Patronal, digitalswitzerland, DSB LU, eGov, ASC, GRI, Inclusion Handicap, Swiss Post, Pro Infirmis, Procap, SAB, SBU, SBV, sgv, CCC, SSV, Swico, SNABLIND, VZGV, Access for All</i>	3 <i>economiesuisse, privatum, SATW</i>	4 <i>CH++, Digitale Gesellschaft, SKS, E-Voting Moratorium Association</i>	2 <i>Confederation of Swiss Employers, UNIFR</i>
<b>Individuals</b>			
3 <i>Florian Moser, IsA, Olivier Pereira</i>	1 <i>Ardita Driza Maurer</i>		
<b>Total</b>			
<b>48</b>	<b>11</b>	<b>8</b>	<b>3</b>

The amendments to Section 3 and the Annex to the PoRO are welcomed by a large majority (cf. Chapter 3.2.2). The following comments therefore focus on the feedback on the e-voting provisions.

##### 3.1.2 Cantons and communes

###### Support (with proposals for adaptation)

The majority of cantons (*AG, AI, AR, BE, BL, BS, GE, GL, GR, LU, NW, OW, SG, SH, SO, TG, TI, UR, VD, ZG, ZH*) support e-voting and the bill in principle. The continuation of the trials and the main features and objectives of the redesign of trials are generally welcomed. Most cantons are convinced of the advantages of e-voting and welcome in particular the fact that the draft submitted makes the relaunch of trials possible and further increases the requirements, which are already high. The specifications are better structured in many areas, which increases their readability and comprehensibility. The cantons and their voters have had positive experiences with e-voting so far; in particular, they highlighted the advantage of e-voting for Swiss voters abroad.

The cantons of *AG, BE, BS, GR, LU, NW, SG, SH, TG* and *ZH* remarked that in further developing and implementing e-voting, it must be ensured that the procedures and processes remain manageable for

the cantons and system providers. Furthermore, when implementing the detailed requirements that the Confederation has laid down (especially in connection with cantonal processes and organisation), care should be taken to ensure that the organisational autonomy of the cantons is preserved (*AG, AR, BE, BS, GL, GR, LU, NW, SG, SH, TG, TI, ZH*). The Canton of *GE* proposes adjustments to certain provisions in order to respect the organisational autonomy of the cantons. The cantons of *AI* and *OW* also note that the regulation has a high level of detail, but state that they can understand this given the current political and public debate (*AI*) or the high requirements for security and trustworthiness (*OW*). From the point of view of the Canton of *AI*, the strict specifications, which leave the cantons no room for manoeuvre, cannot be a permanent solution.

Furthermore, the cantons of *BE, BS, GL, GR, LU, SG, SH* and *TG* call for a review and adjustment of the division of responsibilities between the Confederation, the cantons and the system providers. These cantons take the view that the review should take place in the longer term, as also envisaged in the catalogue of measures drawn up by the Confederation and the cantons.

The majority of cantons (*AG, AI, BE, BL, BS, GL, GR, LU, NW, OW, SG, SH, SO, TG, TI, UR, ZH*) point out that the costs of e-voting are high and that these will continue to rise, especially with the measures planned for the medium to long term. Funding of these costs will have to be secured in the long term. In the next few years, only a few cantons will offer e-voting, and will not be able to finance its further development on their own; a substantial financial contribution from the federal government is necessary. The cantons of *GR, SG* and *TG* therefore welcome the fact that the foundations for such funding have been laid within the framework of eGovernment Switzerland and Digital Public Services Switzerland (DPSS). The Canton of *VD* regrets the fact that the Confederation does not contribute more to the costs and suggests that the DPSS should be involved not only as a source of funding, but also as a political steering body working in partnership with the Confederation, cantons and communes. Furthermore, the cantons of *GL* and *UR* point out the special challenges faced by small cantons with limited resources, and the Canton of *GE* calls for the Confederation to control Swiss Post's tariff structure in order to guarantee that all cantons can make financially viable use of e-voting.

With regard to limiting the voters eligible to participate, the majority of cantons (*AG, AR, BE, GL, GR, NW, SG, SH, SO, TG, TI, ZH*) state that this has a negative influence on the cantons' willingness to offer e-voting. In the cantons' view, e-voting must be offered on a broad basis if it is to be successful and cost-effective. Limiting the number of voters who can vote electronically would not be appropriate in the medium to long term and should therefore only apply in an initial phase after the resumption of trials. As soon as a stable trial operation has been established, the limits are to be lifted. The cantons of *AI, BL* and *BS* share this position. The cantons of *AG, BE, GR, SG, SH, TG* and *ZH* would welcome a time limit on the limits in the PoRO, and the Canton of *GL* calls for the cantons to be allowed to apply to the Federal Chancellery for a review of the limits. The Canton of *ZH* in particular emphasises its critical attitude towards indefinite limitations of the trials – if they should remain unchanged for years despite the successful and secure use of e-voting, this could be interpreted as mistrust of the system and undermine its trustworthiness.

The cantons of *LU, OW* and *VD* support limiting the number of eligible voters and the limits set; the Canton of *LU*, like the majority of cantons, supports the limits in an initial phase following the resumption of trials.

The Canton of *GE* welcomes the fact that people with disabilities are not included in the limits placed on permitted voter numbers, but considers the proposed limits to be too restrictive overall, claiming that this leads to high costs for the cantons and prevents system providers from operating profitably. It requests that the limit on the national electorate be removed.

The Canton of *ZG* supports the introduction of e-voting, but calls for the Confederation to create the legal basis for nationwide use and permanent regular operation. If it is not possible to work towards widespread use of e-voting, the cost/benefit ratio will be unreasonable. For this reason, the Canton of *ZG* calls for the limits on permitted voter numbers to be abolished.

The change in responsibilities for examining systems is welcomed by the majority of cantons (*AG, AI, AR, BE, BL, BS, GE, GL, GR, LU, NW, SG, SH, SO, TG, TI, ZG, ZH*). The cantons of *AG, BE, BS, GL, GR, SG, SH, TG, TI* and *ZH* believe that the focus should be on the continuous improvement process. The Canton of *OW* believes it would be appropriate for the Confederation to examine the system

when in ordinary operation. However, as long as the cantons operate a system voluntarily during the trial phase, they should be free to have their systems examined independently.

The transparency requirements are in principle welcomed by all cantons in this category. In particular, the cantons of *AG*, *BE*, *BL*, *BS*, *GE*, *GR*, *NW*, *SG*, *SH*, *SO*, *TG*, *TI* and *ZH* emphasise the importance of transparency and the publication of the systems for public trust and for detecting weaknesses. The Canton of *AI* also takes the view that transparency is important for creating trust, but the main goal is to develop a secure product. Some cantons point out that the procedure for publishing information on the cantons' operations and processes must respect organisational autonomy (see above). The Canton of *GL* supports the transparency requirements, but also stresses that these are relatively high, especially for small cantons.

Arrangements for the increased involvement of academia are also supported in principle by all the cantons mentioned. However, the cantons of *AG*, *BE*, *BS*, *GR*, *LU*, *NW*, *SG*, *SH*, *SO*, *TG* and *TI* demand that dialogue with the academic community must not take precedence over political decision-making and that the decision must remain with the political decision-makers. The Canton of *GL* emphasises that, with regard to academic involvement, it is necessary to weigh up the various arguments in each case and to clearly define competencies and mandates. The Canton of *OW* is of the view that the cantons should themselves be able to decide on any involvement, since they have to bear the costs.

The cantons of *OW*, *SO* and *VD* expressly welcome the cantons' freedom to decide whether to introduce e-voting. The Canton of *VD* prefers a cautious approach, in particular because of the current lack of public trust in e-voting and open questions regarding the processing of sensitive data. It suggests that a broad discussion be held on digitalisation of political rights.

In addition, the cantons make numerous proposals for amendments to the individual articles, including a call for the licensing procedure to be simplified, at the latest by the time of transition to regular operation (*AG*, *AI*, *BE*, *BL*, *BS*, *GL*, *GR*, *LU*, *SG*, *SO*, *TG*, *TI*, *ZH*).

The Canton of *UR* states that it has taken note of the joint opinion of the cantons of *AG*, *BE*, *BS*, *FR*, *GR*, *NE*, *SG* and *TG* and largely shares its general positions. It points out that, in view of the high costs, it is important for a small canton to be able to 'dock on' to an existing system and to secure long-term funding. It reserves the right to decide on a trial introduction of e-voting only when the financial and organisational framework is definitely in place. In addition, it points out the special circumstances of elections based on a first-past-the-post system.

#### Fundamental reservations

Like the majority of cantons, the cantons of *FR* and *NE* support e-voting and are in favour of continuing the trials. However, unlike the other cantons, they call for a rapid and prioritised review and adjustment of the responsibilities of the Confederation, cantons and system providers. From their point of view, the general situation has changed fundamentally, as only one system provider is now available and the federal government is making detailed technical specifications, thereby increasing the requirements and complexity. This leaves the cantons with no room for manoeuvre, but still bearing the entire responsibility. In the view of the cantons of *FR* and *NE*, this division of tasks and the responsibility for financing the costs is no longer appropriate and should be reviewed urgently. The Canton of *FR* calls for the Confederation to assume more responsibility. Due to the complexity of e-voting, it believes the federal government probably has to provide its own system.

As far as other issues are concerned, attention should be drawn to the statements of the majority of cantons in the category 'Support (with proposals for adaptation)', especially that of the Canton of *FR* (cf. above all the position of the cantons *GR*, *SG* and *TG*). Like the majority of cantons, *FR* and *NE* highlight the high costs and the need for federal financial participation. The Canton of *NE* believes that the impact on costs must be taken into account when considering changes to the requirements. In addition, the Canton of *NE* states that the proposed limits on the numbers of voters are too restrictive and mean that it would have to limit the number of its 'guichet unique' users. This would be contrary to its e-government strategy. The Canton of *NE* takes the view that such limits should only apply to the first ballot or the first year of service. It requests that the limit on the national electorate be removed. Furthermore, the Canton of *NE* is critical of plans to publish e-voting results. It believes that publication would not have the desired

effect, as the e-voting results may differ from the other results, and voting secrecy would be compromised. It believes that there is no satisfactory solution to this problem.

The Canton of VS states that it supports the introduction of e-voting as a medium-term goal, especially for Swiss voters abroad and people with disabilities. It welcomes the 'security before speed' approach and the cantons' freedom of decision. However, the Canton of VS rejects the bill, taking the view that an e-voting system has to be in public hands. This could avoid a monopoly situation and the disadvantages that arise from private providers' desire to make a profit, as well as high costs and unequal treatment of the cantons. The Confederation should work with the cantons to provide a reliable and secure system and take the overall lead, particularly on technical and financial matters. The Canton of VS attached the CCC questionnaire to its response.

*Lausanne* rejects the introduction of e-voting in principle because of security concerns. It is sceptical that e-voting will have a significant impact on voter turnout and would welcome a higher priority being given to modernising and improving counting methods in elections and votes. However, *Lausanne* also states that it does not completely reject the proposed redesign of the trials. In particular, it welcomes the chosen focus on security, the high transparency requirements, the increased involvement of independent experts, and the cantons' freedom to decide on and responsibility for introducing e-voting and procuring the systems.

#### Rejection

The Canton of SZ is against the introduction of e-voting for political and financial reasons. It does not believe that manipulation can ever be completely ruled out in e-voting, and that sophisticated regulation is necessary and this leads to high costs. This would mean that small and medium-sized cantons in particular would reach their limits. It suggests that the Confederation should develop and operate the system and that digitalisation should be promoted in other areas (preparations for National Council elections, conducting consultations). The Canton of SZ welcomes the fact that the cantons are free to decide whether they wish to introduce e-voting.

#### Refrained from commenting in the response

The Canton of JU expressly refrained from submitting a comment as it does not plan to introduce e-voting following its 2018 decision.

### 3.1.3 Political parties

#### Support (with proposals for adaptation)

*The Centre* and the *FDP* support the introduction of e-voting and the continuation of the trial operation. Both parties stress the opportunities offered by digitalisation in relation to political rights and the benefits of e-voting for Swiss voters abroad and for people with disabilities. The *FDP* expressly welcomes the fact that these two target groups are exempted from the limitation of permitted voter numbers. *The Centre* states that the time is not yet ripe for a nationwide introduction of e-voting as a standard voting channel and therefore supports the continuation of e-voting within the framework of a limited trial. It welcomes the proposed limit of 30% of the cantonal electorate and 10% of the national electorate. *The Centre* also supports the division of responsibilities between the Confederation and the cantons, as well as the cantons' freedom to decide whether to introduce e-voting. Both parties stress that ensuring the security of e-voting systems is crucial. The objectives and main features of the redesign proposed are considered suitable for this purpose. The *FDP* also maintains that the electronic voting channel should be at least as easy to use as postal voting, so that the potential of e-voting can be fully exploited. This would require greater consideration of seamless continuity and a system that is generally easy to use.

#### Fundamental reservations

The SP emphasises the importance of ensuring that participation in the direct democratic process is as reliable and as broad as possible, as well as the importance of ensuring public trust in the accuracy of voting and election results. Therefore, e-voting procedures must be sufficiently secure, and conducting

trials is in principle suitable for establishing that this is the case. The *SP* takes the view that e-voting offers advantages primarily for Swiss voters abroad and people with disabilities. It welcomes the increased transparency requirements and that the trials will continue to be carried out with a very limited electorate. However, the *SP* sees a need for substantial changes to the bill submitted. For example, e-voting should only be carried out using an exclusively publicly run system and the system should be published under an open source licence. With regard to the limits on voter numbers, the *SP* states that provision should be made for a staggered increase in the number of voters permitted up to the proposed limits and that the target groups should be included in the limits, while at the same time being given priority access to e-voting (creation of a virtual constituency for Swiss voters abroad). In addition, clear success and failure criteria should be defined for the trials and research and development programmes implemented in order to ensure that there is sufficient traceability of the correct tallying of all votes while maintaining the secrecy of votes in the long term.

The *EDU* in principle welcomes the further development of e-voting and the development of a uniform solution under federal management. However, it calls for e-voting trials in the next few years to be limited exclusively to the participation of Swiss voters abroad. This target group is dependent on e-voting to exercise their political rights. However, the *EDU* does not see any need to introduce e-voting for domestic Swiss voters at the present time.

The *AL Bern* takes the view that trial operation can be continued. It welcomes certain aspects of the bill, such as the new responsibilities for examining the systems, but says that the portion of the electorate allowed to participate should also be limited to 10% in the cantons. In addition, the *AL Bern* demands fundamental changes to the legal bases: it believes that the complete verifiability requirement gives a false impression of complete security against manipulation. The fact that this is not the case should be communicated transparently so that a realistic risk assessment and broad discussion is possible. Furthermore, the traceability of the e-voting systems in the sense of the principle of the publicity of the election is to be prescribed as a specific, technical requirement and the systems are to be disclosed under an open source licence. The *AL Bern* welcomes the Confederation's new responsibility for the examination of the systems and the stronger inclusion of external experts. However, care must be taken to ensure that the experts are genuinely independent. The *AL Bern* also recommends formulating the technical requirements in more general terms in order to avoid a *de facto* requirement for specific solutions.

### Rejection

The *Greens* are sceptical about e-voting and the *SVP* and the *Pirate Party* are fundamentally against e-voting and the continuation of the trials. Overall, the three parties stress the importance of the reliability of elections and voting, as well as the trust of the population. Since these parties believe that e-voting poses security risks, they are critical of its introduction. The *Greens* do see advantages in e-voting for certain groups such as Swiss voters abroad and people with disabilities; they are in favour of improving democracy through technology and welcome the main features and objectives of the redesign, as some of the criticisms of the trials to date have been addressed. However, they do not feel this is enough. From the *SVP*'s point of view, the arguments put forward for the use of e-voting, despite the security risks, are not convincing. For example, they do not believe that declining voter turnout can be prevented with e-voting or that the costs of elections and votes can be reduced. The *Pirate Party* is calling for e-voting to be stopped.

In particular, because of security concerns, the parties are calling for a further restriction of the permitted electorate. The *Greens* and the *SVP* want trials to be restricted to Swiss voters abroad and people with disabilities. For the *Greens*, all Swiss voters abroad should have access to e-voting, regardless of their canton of origin or former canton of residence (creation of a virtual constituency). In addition, the *Greens* believe that a small number of voters in Switzerland could be included without any special admission criteria in order to preserve voting secrecy and to gain experience. However, significantly lower limits than 30% or 10% should be applied. The size of the permitted electorate should only be increased if the solution proves successful.

The *SVP* further maintains that allowing the Federal Chancellery to regularly review the limits should not lead to the trials being extended into a regular use of e-voting.

The *Pirate Party* demands a maximum limit of the maximum difference in votes in all the ballots held in past ten years in any given constituency. This would currently mean a limit of 0.08% of the national electorate.

The *Greens* and the *Pirate Party* demand that the systems be disclosed under an open source licence. The *Greens* are in favour of the federal government commissioning the examination itself in the future. They state that strict requirements should apply in relation to the independence of the experts and their names should be published. In addition, they note that the printing office is increasingly threatening to become the 'weakest link' for attacks. The requirements for printing offices must therefore be constantly developed and reviewed. The involvement of the academic community is welcomed and should be promoted through appropriate programmes. The *Pirate Party* also demands that independent experts should not be chosen selectively, that they should be able to publish their findings without restriction and that their recommendations should be implemented consistently. It also calls for more open and unrestricted methods of public scrutiny (e.g. denial of service and social engineering attacks). The official procedures should be accessible to all voters, not just to voters' representatives. Moreover, the bill does not regulate how the authorities would cope if errors were found or verification failed during or after a ballot. Overall, the *Greens* would prefer the state to take on even more responsibility. System development, for example, should be the responsibility of the Confederation and the cantons and not left to private providers with commercial interests. In developing the system, they can cooperate with the private sector or academia within defined assignments and mandates. In addition, clear success and failure criteria should be defined for the trials.

The *Greens* and the *Pirate Party* also criticise the fact that e-voting is being pushed forward at great public expense and call for the focus to be placed on other digitalisation projects (*Greens'* proposal: e-collecting, neighbourhood democracy tools, electronic consultation procedures).

### 3.1.4 Organisations

#### Support (with proposals for adaptation)

The CCC's opinion is basically identical to that of the cantons of GR, SG and TG (see the comments in Chapter 3.1.2). The CCC is also convinced of the advantages of e-voting and welcomes the bill, which creates the conditions for resuming the trials. In addition, the CCC notes that the principles pursued in e-voting (e.g. working with the academic community, developing new security technologies, dialogue with the public) would provide valuable experience for further e-government projects. For this reason, e-voting should be regarded as a strategic e-government project and pursued and financially supported within the framework of the Digital Public Services Switzerland. The CCC takes the view that the general situation has changed fundamentally, since only one system provider is available and the federal government is making detailed technical specifications. This leaves the cantons with no room for manoeuvre, it believes, making the current model of responsibilities no longer appropriate. The CCC is therefore calling for a review and change in the division of responsibilities between the Confederation, the cantons and the system providers in the near future.

The VZGV also supports the introduction of e-voting. It calls for its definitive introduction to be pursued as a matter of priority, as it is an ever-growing need among the population. Provided there are no security issues, the VZGV would welcome an end to limits on permitted voter numbers, so that all voters would have access to e-voting. It considers a central examination of the systems by the Confederation to be expedient, but questions whether the entire system should not be made available centrally for all cantons. In addition, it regards the introduction of the electronic tallying of the ballots (e-counting) as a sensible measure.

The SSV and the ASC support the introduction of e-voting and the redesign of the trials. They stress the importance of the security of the voting channels and of public trust in the voting and election results. Against this background, the SSV welcomes the gradual relaunch of trials with a limited electorate, with the exception of Swiss voters abroad and people with disabilities. For the SSV, it makes sense for the Confederation to assume responsibility for examining the systems and their operation for the time being, but in the medium term this responsibility should be transferred to the cantons. With regard to the limits, however, the SSV would prefer a more flexible arrangement in order to avoid the need for an immediate revision of the PoRO. Furthermore, the SSV believes that the extent to which e-voting can revitalise

democracy is questionable and therefore the proportionality of costs and benefits should be kept in mind. Contrary to the bill and the majority opinion within the SSV, some of its members would prefer a nationally uniform, state-based system. The ASC maintains that the communes must be appropriately involved in the implementation work from the outset. The far-reaching arrangements with direct effects on the cantons and communes must be implemented so that they can retain their organisational autonomy. The ASC also points out that e-voting leads to high costs and that funding must be ensured in the long term. The cantons are dependent on financial support from the federal government. It welcomes the fact that a basis for this funding has been created with Digital Public Services Switzerland.

The *DSB LU* in its statement welcomes the key points of the bill and emphasises complete verifiability, the preservation of voting secrecy and strict checks on compliance with the requirements as crucial to trust in e-voting. The *DSB LU* takes the view that the specifications for the risk assessment should not only include security risks but also data protection risks (personal information on voters) and, in accordance with legal requirements, a data protection impact assessment should be carried out. It also stresses that, in order to preserve voting secrecy, the data relating to the person voting and their vote must be logically separated and the confidential data must be destroyed as soon as reasonably practicable. Furthermore, the technical and organisational measures should be based on generally recognised standards and the cryptographic protocol should be state of the art.

*OSA* supports the bill to redesign trials and stresses the importance of e-voting for Swiss voters abroad, who, in the absence of e-voting, are often unable to exercise their political rights because of the time it takes for postal votes to arrive. E-voting offers Swiss voters abroad and people with disabilities the opportunity to participate in politics without restriction. *OSA* welcomes the objectives and main features of the redesign and, in particular, the fact that the target groups are to be exempted from the limits on the electorate. In line with its 2019 resolution, *OSA* is calling for e-voting to be available for the 2023 federal elections, for the Federal Council to take the lead role in developing and maintaining an e-voting system and assume responsibility for its funding, and for the cantons to introduce the legislation required to offer e-voting by the 2023 federal elections. The Federal Council and the cantons should continue with their efforts to have a reliable, trustworthy and financially secure electronic voting channel developed as a matter of priority. In particular, unresolved questions concerning financing should not be allowed to hamper the relaunch of trials.

The organisations representing people with disabilities *Inclusion Handicap*, *Procap*, *Pro Infirmis*, *SBU*, *SBV* and *SNABLIND* welcome the introduction of an electronic voting channel, as this will enable people with disabilities to participate in elections and votes unhindered. When voting on paper, they often have to rely on the assistance of third parties and are thus unable to exercise their political rights independently and preserve voting secrecy. These organisations support the continuation of the trial operation and the main features and objectives of the redesign. In particular, they welcome the fact that people with disabilities are to be excluded from the limits on the electorate and call for clear criteria for admission under this provision. *Inclusion Handicap* and *Pro Infirmis* are calling for all people with disabilities, regardless of their canton of residence, to have access to e-voting by the 2023 federal elections at the latest. All the organisations mentioned also call for the relevant legislation to be supplemented with a binding requirement for comprehensive accessibility throughout the process. Thus, the system and all information on e-voting and the documents for elections and votes should be accessible without barriers. Compliance with this requirement would have to be verified when the systems are examined by the authorities and the public. In order to ensure accessibility for people with disabilities, experts from this field should be consulted in addition to experts from the academic community. To this end, cooperation with important professional associations and organisations would be appropriate.

For the *Access for All Foundation*, the accessibility issue is covered, as the legislation requires the client-side part of the software to comply with the eCH-0059 accessibility standard.

*Swiss Post*, as an e-voting system provider, aims at enabling secure and uninterrupted trial operations. This can only succeed, it believes, if there is continued investment in the development and introduction of e-voting and if its use can be extended to further cantons in the coming years. *Swiss Post* agrees with the objectives and main features of the redesigned trials. It thinks the bill provides a stable foundation for continuing the trials. For subsequent stages of the trials, further adjustments should be examined on the basis of catalogue of measures agreed by the Confederation and the cantons. *Swiss Post* notes that the increased requirements for transparency and public involvement are in line with *Swiss Post's*

strategy for the continuous development of the system. *Swiss Post* regards the requirement that only systems with complete verifiability will be approved as an essential new feature and the most important measure for strengthening security. *Swiss Post* understands the rationale behind limiting voter numbers in the next trial phase, but the chosen limits are too restrictive in view of the complete verifiability of the systems. They would make the more widespread use of e-voting less likely and the costs for the cantons would be too high as a result. *Swiss Post* calls for the limits on the national electorate to be waived and for the criteria for adjusting the limits to be specified. In addition, *Swiss Post* proposes various amendments to the requirements for disclosing the source code and the documentation on the system and its operation, and to the technical requirements in the OEV. It notes that the many requirements for the systems and processes are very strict and that seamless implementation in the cantons and by the system provider is complex and time-consuming.

The *BFH* supports the changes to the legislation and the main features of the redesign of trials. It understands the bill submitted to be a stage in this redesign, as stated in the final report from the Confederation and the cantons. The *BFH* expects further changes to be made and the early involvement of the academic community before the trials move to regular operation. The *BFH* makes numerous proposals for amendments to the bill. In particular, it considers the trust assumptions to be excessive and calls for them to be reduced even further, at the latest when transitioning e-voting to regular operation. Due to the high trust assumptions, the limits on voter numbers are necessary and the proposed limits should not be increased further. The *BFH* also considers it conceivable that the Confederation could develop and operate its own system in cooperation with research and business partners.

*Digitalswitzerland* and *Swico* support the introduction of e-voting and the main features of the bill. *Digitalswitzerland* expressly welcomes the technical requirements of the bill, the high transparency requirements and the ongoing review and development of the system. *Swico* highlights the advantages of e-voting for Swiss voters abroad, for reducing the likelihood of invalid ballot papers and for traceability and transparency. *Digitalswitzerland* and *Swico* expressly welcome the fact that the trials with a limited electorate are to be continued. This they feel is appropriate and necessary for strengthening security and trust. In order to avoid the national limit being reached too quickly, *Swico* suggests a limit of 20% of the cantonal and 20% of the national electorate. Furthermore, *Digitalswitzerland* and *Swico* welcome in particular the effort to increase trust and transparency as well as the inclusion of the academic community and the public, for example via bug bounty programmes. In contrast to the bill, *Swico* would welcome a further centralisation of responsibilities and suggests that the development of a state system should be examined, and calls for details of e-voting systems to be published under an open source licence. *Digitalswitzerland*, on the other hand, is in favour of the decentralised approach, as it believes a decentrally managed system entails fewer risks overall. *Digitalswitzerland* is sceptical about the feasibility of verifiability while preserving voting secrecy, while *Swico* states that verifiability and the guarantee of anonymity are technically feasible in principle. Furthermore, *Swico* suggests various adjustments: among other things, it would welcome the establishment of a permanent commission instead of alternating electoral offices, as well as rules on the procedure to be followed in the event of justified doubts about an electronic ballot. *Digitalswitzerland* also states that in addition to e-voting, other e-government projects should be promoted (especially projects with high relevance for the economy, digitalisation of the healthcare system and e-collecting).

*eGov* and the *GRI* also support the introduction of e-voting, but are against limiting voter numbers. *eGov* considers e-voting to be an important component of e-government and welcomes the objectives and increased requirements of the redesign. However, it takes the view that limiting the electorate runs contrary to the requirement of verifiability and is an unnecessary obstacle to e-voting becoming more widespread and trusted. The *GRI* opposes the limits, calling for an end to the trial phase and the proper introduction of the electronic voting channel for all voters. Furthermore, the *GRI* highlights various aspects that should be given greater consideration (e.g. the costs of paper voting; stronger incentives for standardised, uniform system solutions; involvement of experts from the fields of sustainable development, communication, user experience and usability).

The *sgv* and the *Centre Patronal* support the introduction and relaunch of e-voting, the bill and its objectives. They consider the assurance of security and the building of trust to be of crucial importance. They therefore welcome the proposed limitation of the electorate. The *sgv* considers the proposed limits to be reasonable. However, the *Centre Patronal* feels that the limit of 30% of the cantonal electorate is too high and suggests that it be set at 25%, for example. The *Centre Patronal* believes it should be

possible to develop reliable solutions. Once these solutions are in place, electronic voting should be transitioned to regular operation. The *sgv* also stresses the importance of guaranteeing data protection and the need to secure demonstrable benefits of greater involvement of the academic community.

The *SAB* supports the relaunch of the trials, as e-voting offers major advantages for mountain and rural areas and for Swiss voters abroad. It says that it is important to have a simple voting system and public trust; the provision of clear information and awareness-raising among the public as well as an examination of the systems by independent experts are crucial in achieving this. For cost reasons, the *SAB* urges the Federal Chancellery, in cooperation with the Conference of Cantonal Governments, to press ahead with and coordinate the procurement of a single system. This would also enable smaller cantons to use e-voting. Any passing on of costs to the communes should be prevented.

### Fundamental reservations

*Economiesuisse* welcomes the technical implementation of the bill and the chosen procedure of involving experts, as well as the high transparency requirements, but remains critical of the expansion of e-voting, as the basic criticism of e-voting remains. *Economiesuisse* stresses the importance of security and trust in the voting channels and calls for a comprehensive discussion of the risks and future developments before further progress is made with e-voting. Overall, it believes that e-voting offers no particular added value except for Swiss voters abroad and people with disabilities, and it leads to high costs. Therefore, other e-government projects should have priority (especially projects with high relevance for the economy and digitalisation of the healthcare system). *Economiesuisse* also welcomes the decentralised approach, as it believes a decentralised system entails fewer risks overall. Individual members of *economiesuisse* are less critical of the bill and would welcome further progress with e-voting.

*Privatim* states that guaranteeing the integrity of electronic elections and voting is essential to the public's trust in e-voting. It welcomes the objectives and main features of the redesign of trials; in particular, the disclosure of information on the system and how it operates is a good way of increasing security and thus building transparency and trust. However, *privatim* points out that the risks of manipulation in e-voting cannot be assessed or controlled. The proposed redesign could lead to a temporary improvement in information security, but it is questionable whether the requirements could be implemented in this way in the cantons. It does not regard the procurement and examination of numerous systems nor a concentration on a few system providers as sensible. This problem should be taken into account.

*SATW* welcomes the general thrust of the redesign; in particular, it supports the fact that acceptance and technologies are to be tested in a reduced environment as a means of gaining experience. Trials should be made possible primarily for Swiss voters abroad. In addition, domestic Swiss voters may also be permitted to participate in individual ballots if statistical outliers can be identified and e-voting is used only for communal, cantonal and federal proposals with limited impact. Critically, it states that e-voting is not essential for the functioning of democracy and that the focus should be on more important and useful projects. *SATW* makes further recommendations, for example a staggered introduction of e-voting in order to avoid unacceptable risks. Overall, the risks and benefits should always be weighed up and, if there is any doubt, action should favour risk minimisation. In addition, the focus of the trial operation should be on transparency and easy verifiability for non-experts, and the comprehensive and integral security of the systems should be set up and tested from a modern point of view. Lastly, close international cooperation should be cultivated and a situation must be prevented in which the opinion-forming process loses importance just because casting a vote electronically is easier and faster.

### Rejection

For *CH++* there is insufficient basis for continuing the trials. In view of the risks of manipulation, a comprehensive research and development programme would have to be carried out before the trials could be resumed. This is the only way to meet the challenges of establishing a trustworthy e-voting system. Generally, *CH++* suggests that the further development of direct democracy should first focus on areas with a better balance of risks and benefits (e.g. e-collecting, e-petition, e-consultation). *CH++* suggests the following requirements for the bill: Clear success and failure criteria must be defined for the trials, the systems must be made public under an open source licence and a solution must be found for in-

cluding all Swiss voters abroad, irrespective of their canton of origin or former canton of residence (creation of a virtual constituency). CH++ welcomes the new responsibilities that the Confederation will assume in examining the systems, but would prefer the development and operation of the systems to be entirely the responsibility of the Confederation and the cantons.

The *Digitale Gesellschaft* and the *E-voting Moratorium Association* reject e-voting and the proposed bill. In particular, they see serious risks of manipulation, a lack of trust as well as shortcomings in guaranteeing security, in the comprehensibility and traceability for voters and in implementing sufficient verifiability while guaranteeing voting secrecy. Compared to postal voting, e-voting poses higher risks, but offers hardly any additional benefits, not even for specific target groups or for increasing voter participation, and it leads to high costs. With regard to the bill, the *Digitale Gesellschaft* demands in particular that the systems be disclosed under an open source licence, that denial-of-service attacks be tested and their results published, and that the Confederation and the cantons assume greater responsibility for developing the system, as development should not be dependent on the commercial interests of private providers. The *Digitale Gesellschaft* and the *E-voting Moratorium Association* recognise the quality of the regulations on e-voting to some extent, but in the opinion of the *E-voting Moratorium Association* e-voting is not feasible because it requires too many resources and too much know-how. The *Digitale Gesellschaft* calls for more organisations with technical expertise to be involved and for their recommendations to be implemented consistently. According to the *Digitale Gesellschaft*, other e-government projects should be given more attention instead of e-voting (e.g. e-collecting, e-consultation).

For the SKS, the negative aspects of e-voting in its proposed form outweigh the positive ones. The bill entails hardly any benefit to the population, but instead brings significant risks and costs. It welcomes the concept of e-voting as a further way of exercising political rights, one which could benefit people with disabilities. However, the benefit for people with disabilities is small, as the legislation does not provide for an obligation of accessibility, and the organisation does not believe that e-voting increases voter participation. Increased participation would be possible at lower cost (e.g. with pre-franked reply envelopes for postal voters) or in particular with e-collecting. The SKS also criticises the fact that no disclosure of the system under an open source licence is required, that Swiss Post, as the only remaining system provider, has a de facto monopoly and that e-voting could lead to scepticism among the population due to increased risks of manipulation. E-voting should therefore only be available, if at all, to selected groups of people such as Swiss voters abroad.

#### Refrained from commenting in response

The *Confederation of Swiss Employers* and the *UNIFR* expressly refrained from commenting.

### 3.1.5 Individuals

#### Support (with proposals for adaptation)

*IsA* – a group of private individuals who focus on the security of elections and votes – supports the bill in principle and explicitly welcomes the short- to medium-term limitation of trial operations as well as the requirements for transparency and public involvement. However, *IsA* demands that e-voting systems be published under an open source licence, together with the publication of further information on the development process (commit history) in order to build a sustainable international expert community. As a compromise, it proposes a transitional solution for the next trial phase with a binding time horizon until a mandatory open source requirement is in place. *IsA* considers the 2020 dialog with the academic community to have been a success and notes that international experts have been positive about Switzerland's handling of e-voting and its regulation. Otherwise, in addition to detailed feedback on the individual provisions, it notes that the technical requirements are highly detailed and that there is a risk of overregulation and lack of comprehensibility.

Of the other private individuals, *Florian Moser* and *Olivier Pereira* are basically positive about the bill. *Olivier Pereira* welcomes the fact that the proposed requirements are precise and stricter; in particular, he supports the new responsibilities for examining the systems, the limits on voter numbers, and the involvement of the academic community and the public. He believes that the transparency and security requirements are in line with the state of the art in academic circles, which facilitates better involvement

of the academic community. *Florian Moser* also supports the objectives of the redesign, but calls for the systems and their documentation to be disclosed under an open source licence. He also points out that when existing systems (and their associated regulation) are further developed, alternative approaches should not be excluded.

#### Fundamental reservations

*Ardita Driza Maurer* welcomes the main features and objectives of the redesign in principle. She assesses the bill from a legal perspective and questions the conformity of some aspects with the legislation or calls for a more in-depth legal and political discussion. In particular, she calls for further legislation in various places, especially if the scheme is no longer experimental but permanent. From *Ardita Driza Maurer*'s point of view, it is unclear whether this is the case, as various aspects suggest e-voting is now a permanent solution (e.g. continuous improvement process; medium to long-term package of measures; lack of objectives or evaluation criteria for the trials).

### **3.2 Evaluation of the questionnaire**

The consultation draft included a questionnaire with the following questions and a table for feedback on the individual articles. A purely quantitative evaluation of the responses is presented here. For the detailed comments and proposed amendments, reference is made to the remarks in Chapter 3.1 and the individual comments.

#### 3.2.1 Evaluation of the questions

<b>Question 1.1:</b> Are you in favour of the main ideas and objectives of the redesign of trials for e-voting?				
	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	15	9	1	AG, AI, AR, BE, BL, BS, FR, GE, GL, GR, LU, NE, NW, OW, SG, SH, SZ, TG, TI, VD, VS, ZG, ZH
<b>Parties</b>	0	1	3	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	13	2	3	BFH, Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, sgv, CCC, SSV, SNABLIND, E-Voting Moratorium Association, VZGV
<b>Individuals</b>	1	2	0	Florian Moser, IsA, Olivier Pereira
<b>Total</b>	<b>29</b>	<b>14</b>	<b>7</b>	

#### **Question 1.2:** Further general feedback on the redesign of trials and the draft for consultation

	Comments submitted
<b>Cantons and communes</b>	AG, AI, AR, BE, BL, BS, FR, GL, GR, LU, NW, OW, SG, SH, SO, SZ, TG, TI, VS, ZH
<b>Parties</b>	SP, Pirate Party
<b>Organisations</b>	BFH, Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, sgv, CCC, SSV, SNABLIND, E-Voting Moratorium Association, VZGV
<b>Individuals</b>	IsA

**Question 2.1.1:** Do you consider the draft legislation to be suitable for implementing the objective of further developing the systems (in particular Art. 27*i* draft PoRO, Art. 5-8 draft OEV and Annex to draft OEV)?

	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	19	5	1	AG, AI, BE, BL, BS, FR, GE, GL, GR, LU, NE, NW, SG, SH, SO, SZ, TG, TI, VS, ZH
<b>Parties</b>	0	0	4	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	13	2	3	BFH, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND, E-Voting Moratorium Association
<b>Individuals</b>	0	1	0	IsA
<b>Total</b>	<b>32</b>	<b>8</b>	<b>8</b>	

**Question 2.2.1:** Do you consider that the new legal provisions will enable the objective of effective control and oversight to be achieved (in particular the adaptation of responsibilities for the examination of e-voting systems and their operation in Art. 27*i* draft PoRO, Art. 10 draft OEV and No 26 Annex to the draft OEV; also Art. 27*i* draft PoRO and Art. 4 draft OEV)?

	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	21	3	0	AG, BE, BL, BS, FR, GE, GL, GR, LU, NE, NW, OW, SG, SH, SO, TG, TI, VS, ZH
<b>Parties</b>	0	3	1	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	12	4	2	BFH, Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, sgv, CCC, SSV, SNABLIND, E-Voting Moratorium Association, VZGV
<b>Individuals</b>	0	1	0	IsA, Olivier Pereira
<b>Total</b>	<b>33</b>	<b>11</b>	<b>3</b>	

**Question 2.3.1:** Do you think it is necessary to limit the number of voters using e-voting and, if so, what is your opinion on the limits chosen (Art. 27*f* draft PoRO)?

	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	5	15	5	AG, AI, AR, BE, BL, BS, FR, GE, GL, GR, LU, NE, NW, SG, SH, SO, SZ, TG, TI, VD, VS, ZG, ZH
<b>Parties</b>	0	4	0	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	10	6	2	BFH, Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, sgv, CCC, SSV, SNABLIND, E-Voting Moratorium Association, VZGV
<b>Individuals</b>	2	0	0	IsA, Olivier Pereira
<b>Total</b>	<b>17</b>	<b>25</b>	<b>7</b>	

**Question 2.3.2:** Do you consider the draft legal provisions on the disclosure of information and the involvement of the public to be suitable for promoting transparency and trust (in particular Art. 27m draft PoRO; Arts 11-13 draft OEV)?

	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	19	5	1	AG, AI, BE, BL, BS, FR, GE, GL, GR, LU, NE, NW, SG, SH, SO, SZ, TG, TI, VS, ZH
<b>Parties</b>	0	2	2	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	9	3	2	Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND, E-Voting Moratorium Association
<b>Individuals</b>	1	0	2	Florian Moser, IsA, Olivier Pereira
<b>Total</b>	<b>29</b>	<b>10</b>	<b>7</b>	

**Question 2.4.1:** Do you consider the draft legal provisions to be suitable for implementing the objective of closer cooperation with the academic community (in particular Art. 27m draft PoRO, Art. 27o draft PoRO, Arts 11-13 draft OEV)?

	Yes	Yes with reservations	No	Comments submitted
<b>Cantons and communes</b>	20	5	0	AG, AI, BE, BS, FR, GL, GR, LU, NW, OW, SG, SH, SO, TG, TI, VS
<b>Parties</b>	1	3	0	Greens, SP, AL Bern, Pirate Party
<b>Organisations</b>	11	6	1	Centre Patronal, CH++, Digitale Gesellschaft, eGov, ASC, GRI, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND, E-Voting Moratorium Association
<b>Individuals</b>	2	0	0	IsA, Olivier Pereira
<b>Total</b>	<b>34</b>	<b>14</b>	<b>1</b>	

### 3.2.2 Evaluation of the discussion on individual articles in bill

PoRO		Necessary?			Sufficient?			Practicable?			Changes / comments submitted		
		Yes	No	Possibly	Yes	No	Possibly	Yes	No	Possibly			
Art. 8a para.1	Cantons / Communes	8	0	0	10	1	0	10	0	0	GE, NW		
	Parties	1	0	0	1	0	0	1	0	0			
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>1</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>			
Art. 8d para. 3	Cantons / Communes	7	1	0	8	0	0	8	0	0	FR, GE		
	Parties	1	0	0	1	0	0	1	0	0			
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>0</b>	<b>0</b>			
Art. 27b let. b	Cantons / Communes	6	1	0	5	2	2	6	1	2	AG, BE, BS, FR, GE, GL, GR, LU, NE, SG, TG, TI, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Swiss Post, CCC		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>8</b>	<b>2</b>	<b>0</b>	<b>7</b>	<b>3</b>	<b>2</b>	<b>8</b>	<b>2</b>	<b>2</b>			
Art. 27d let. c	Cantons / Communes	8	0	0	9	0	0	9	0	0	GE		
	Parties	0	1	0	0	1	0	0	1	0	SP, Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	CH++		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>11</b>	<b>1</b>	<b>0</b>	<b>11</b>	<b>1</b>	<b>0</b>			
Art. 27e paras 1-2	Cantons / Communes	6	2	0	8	1	0	7	2	0	AI, BS, GE, GL, GR, LU, SG, SO, TG, TI, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	SP, Pirate Party		
	Organisations	1	0	0	1	1	0	1	0	0	CH++, Post, CCC		
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>8</b>	<b>3</b>	<b>0</b>	<b>10</b>	<b>3</b>	<b>0</b>	<b>9</b>	<b>3</b>	<b>0</b>			
Art. 27f	Cantons / Communes	5	4	1	3	5	2	2	6	2	AG, AI, BE, BS, FR, GE, GL, GR, LU, NE, SG, SO, TG, TI, VS, ZG, ZH		
	Parties	0	1	0	0	2	0	0	1	0	SP, AL Bern, Pirate Party		

PoRO		Necessary?			Sufficient?			Practicable?			Changes / comments submitted		
		Yes	No	Possibly	Yes	No	Possibly	Yes	No	Possibly			
	Organisations	5	1	0	5	1	0	5	0	0	Centre Patronal, CH++, eGov, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND		
	Individuals	1	0	0	0	1	0	0	0	1	IsA		
	<b>Total</b>	<b>11</b>	<b>6</b>	<b>1</b>	<b>8</b>	<b>9</b>	<b>2</b>	<b>7</b>	<b>7</b>	<b>3</b>			
Art. 27 <i>i</i> paras 1-2	Cantons / Communes	8	0	0	8	0	1	8	0	1	AG, BE, FR, GE, GR, LU, SG, TG, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	SP, Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	BFH, CH++, Procap, SBU, SBV, CCC, SSV, SNABLIND		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>10</b>	<b>1</b>	<b>1</b>	<b>10</b>	<b>1</b>	<b>1</b>			
Art. 27 <i>l</i>	Cantons / Communes	8	0	0	7	0	2	7	0	2	AG, BE, BS, FR, GE, GL, GR, LU, SG, TG, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Swiss Post, Procap, SBU, SBV, CCC, SNABLIND		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>1</b>	<b>2</b>	<b>9</b>	<b>1</b>	<b>2</b>			
Art. 27 <i>m</i>	Cantons / Communes	7	1	0	5	1	3	5	1	3	AG, BE, BS, FR, GE, GL, GR, LU, NE, SG, TG, TI, VS, ZH		
	Parties	1	1	0	0	1	0	0	1	0	SP, AL Bern, Pirate Party		
	Organisations	6	0	0	1	0	1	1	0	3	BFH, Centre Patronal, CH++, Digitale Gesellschaft, Procap, SBU, SBV, CCC, SNABLIND		
	Individuals	1	0	0	0	1	0	0	0	1	IsA		
	<b>Total</b>	<b>15</b>	<b>2</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>7</b>			
Art. 27 <i>o</i>	Cantons / Communes	8	0	0	8	1	0	8	1	0	AG, BE, FR, GE, GL, GR, LU, SG, TG, TI, VS		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	CCC		
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>10</b>	<b>2</b>	<b>0</b>	<b>10</b>	<b>2</b>	<b>0</b>			
Annex 3a	Cantons / Communes	6	0	0	6	0	0	6	0	0	GE		
	Parties	1	0	0	0	1	0	1	0	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>0</b>			

OEV		Necessary?			Sufficient?			Practicable?			Changes / comments submitted		
		Yes	No	Possibly	Yes	No	Possibly	Yes	No	Possibly			
Arts 1-2	Cantons / Communes	8	0	0	6	0	2	6	0	2	AG, AI, BE, FR, GE, GR, NE, SG, TG, VS		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	BFH, CCC		
	Individuals	1	0	0	0	0	1	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>7</b>	<b>1</b>	<b>3</b>	<b>8</b>	<b>1</b>	<b>2</b>			
Art. 3	Cantons / Communes	7	0	0	8	0	0	7	1	0	GE, SO		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	3	BFH, Procap, SBU, SBV, SNABLIND		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>3</b>			
Art. 4	Cantons / Communes	8	0	0	5	0	3	5	0	3	AG, BE, FR, GE, GL, GR, SG, TG, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	BFH, CCC		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>6</b>	<b>2</b>	<b>3</b>	<b>7</b>	<b>1</b>	<b>3</b>			
Art. 5	Cantons / Communes	8	0	0	8	0	0	8	0	0	GE, LU		
	Parties	0	1	0	0	2	0	0	2	0	SP, AL Bern, Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Swiss Post, Procap, SBU, SBV, SNABLIND		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>10</b>	<b>2</b>	<b>0</b>			
Art. 6	Cantons / Communes	8	0	0	8	0	0	8	0	0	GE		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>10</b>	<b>1</b>	<b>0</b>			
Art. 7	Cantons / Communes	7	0	0	7	0	0	7	0	0	GE		
	Parties	0	1	0	0	2	0	0	2	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Procap, SBU, SBV, SNABLIND		

OEV		Necessary?			Sufficient?			Practicable?			Changes / comments submitted		
		Yes	No	Possibly	Yes	No	Possibly	Yes	No	Possibly			
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	GE, LU		
Art. 8	Cantons / Communes	7	0	0	7	0	0	7	0	0	Pirate Party		
	Parties	0	1	0	0	2	0	0	2	0			
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>			
Art. 9	Cantons / Communes	8	0	0	5	0	3	5	0	3	AG, BE, FR, GE, GR, LU, SG, SO, TG, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Swiss Post, CCC		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>7</b>	<b>1</b>	<b>3</b>	<b>7</b>	<b>1</b>	<b>3</b>			
Art. 10	Cantons / Communes	8	0	0	5	0	3	5	0	3	AG, BE, BS, FR, GE, GL, GR, LU, SG, TG, VS, ZH		
	Parties	0	1	0	0	2	0	0	2	0	Pirate Party		
	Organisations	1	0	0	0	0	1	0	0	1	Swiss Post, Procap, SBU, SBV, CCC, SNABLIND		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>3</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>4</b>			
Art. 11	Cantons / Communes	8	0	0	7	0	1	4	0	4	BE, FR, GE, GL, GR, LU, NE, SG, TG, TI, VS, ZH		
	Parties	1	1	0	0	2	0	0	2	0	Pirate Party		
	Organisations	1	0	0	0	0	1	0	0	1	BFH, Swiss Post, CCC		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>11</b>	<b>1</b>	<b>0</b>	<b>7</b>	<b>3</b>	<b>2</b>	<b>5</b>	<b>2</b>	<b>5</b>			
Art. 12	Cantons / Communes	8	0	0	6	0	2	4	0	4	AG, BE, BS, FR, GE, GL, GR, LU, SG, TG, VS, ZH		
	Parties	1	1	0	0	2	0	0	2	0	Pirate Party		
	Organisations	1	0	0	0	0	1	0	0	1	BFH, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>11</b>	<b>1</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>5</b>			
Art. 13	Cantons / Communes	7	1	0	7	1	0	5	1	2	GE, LU, NE, ZH		
	Parties	0	1	0	0	2	0	0	2	0	Pirate Party		

OEV		Necessary?			Sufficient?			Practicable?			Changes / comments submitted		
		Yes	No	Possibly	Yes	No	Possibly	Yes	No	Possibly			
	Organisations	1	0	0	0	0	1	0	0	1	Centre Patronal, Swiss Post, Procap, SBU, SBV, SNABLIND		
	Individuals	1	0	0	1	0	0	1	0	0	IsA		
	<b>Total</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>8</b>	<b>3</b>	<b>1</b>	<b>6</b>	<b>3</b>	<b>3</b>			
Art. 14	Cantons / Communes	8	0	0	8	0	0	8	0	0	GE		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	4	1	0	4	Procap, SBU, SBV, SNABLIND		
	Individuals	1	0	0	0	1	0	0	1	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>4</b>	<b>9</b>	<b>2</b>	<b>4</b>			
Art. 15	Cantons / Communes	7	0	1	4	1	3	4	0	4	AG, BE, FR, GE, GL, GR, LU, SG, TG, VS, ZH		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	CCC		
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>9</b>	<b>1</b>	<b>1</b>	<b>6</b>	<b>2</b>	<b>3</b>	<b>6</b>	<b>1</b>	<b>4</b>			
Art. 16	Cantons / Communes	8	0	0	8	0	0	8	0	0	GE		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0	Swiss Post		
	Individuals	1	0	0	0	1	0	1	0	0	IsA		
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>10</b>	<b>1</b>	<b>0</b>			
Art. 17	Cantons / Communes	8	0	0	6	0	2	6	0	2	AG, BE, GE		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>8</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>1</b>	<b>2</b>			
Art. 18	Cantons / Communes	8	0	0	8	0	0	8	0	0	GE		
	Parties	0	1	0	0	1	0	0	1	0	Pirate Party		
	Organisations	1	0	0	1	0	0	1	0	0			
	Individuals	1	0	0	1	0	0	1	0	0			
	<b>Total</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>10</b>	<b>1</b>	<b>0</b>			

Annex OEV		Changes / comments submitted
General	Cantons / Communes	AI, GE
	Parties	Pirate Party
No 1	Cantons / Communes	AG, BE, FR, GL, GR, SG, SO, TG, VS, ZH
	Organisations	Swiss Post, CCC
No 2	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, Swiss Post, CCC
	Individuals	Florian Moser, IsA
No 3	Cantons / Communes	AG, BE, FR, GL, GR, SG, SO, TG, VS, ZH
	Organisations	BFH, Swiss Post, CCC
	Individuals	Florian Moser
No 4	Cantons / Communes	AG, BE, FR, GL, GR, SG, SO, SZ, TG, VS, ZH
	Organisations	BFH, Swiss Post, Procap, SBU, SBV, CCC, SNABLIND
	Individuals	Florian Moser
No 6	Organisations	SBU, Procap, SBV, SNABLIND
No 7	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS
	Organisations	BFH, CCC
No 8	Cantons / Communes	AG, BE, BS, FR, GL, GR, SG, SO, SZ, TG, VS, ZH
	Organisations	BFH, Procap, SBU, SBV, CCC, SNABLIND
	Individuals	Florian Moser, IsA
No 10	Organisations	BFH
No 11	Cantons / Communes	AG, BE, BS, GR, SG, SZ, TG, VS
	Organisations	BFH, CCC
	Individuals	Florian Moser
No 12	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, CCC
	Individuals	IsA
No 13	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, Swiss Post, CCC
	Individuals	IsA

Annex OEV		Changes / comments submitted
No 14	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
	Individuals	lsA
No 16	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, CCC
	Individuals	lsA
No 17	Organisations	BFH
No 18	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 19	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 20	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 21	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 22	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 23	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	CCC
No 24	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, CCC
	Individuals	Florian Moser, lsA
No 25	Cantons / Communes	AG, BE, FR, GL, GR, SG, TG, VS, ZH
	Organisations	BFH, Swiss Post, CCC
	Individuals	Florian Moser
No 26	Cantons / Communes	GE, GL
	Organisations	Swiss Post
	Individuals	lsA

## Anhang / Annexe / Allegato / Annex

### **Liste der Vernehmlassungsteilnehmenden Liste des participants à la consultation Elenco dei partecipanti alla consultazione List of participants in the consultation**

#### **Kantone und Gemeinden / Cantons et communes / Cantoni e comuni / Cantons and Communes**

<b>AG</b>	Aargau / Argovie / Argovia / Aargau
<b>AI</b>	Appenzell Innerrhoden / Appenzell Rh.-Int. / Appenzello Interno / Appenzell Innerrhoden
<b>AR</b>	Appenzell Ausserrhoden / Appenzell Rh.-Ext. / Appenzello Esterno / Appenzell Ausserrhoden
<b>BE</b>	Bern / Berne / Berna / Bern
<b>BL</b>	Basel-Landschaft / Bâle-Campagne / Basilea-Campagna / Basel-Landschaft
<b>BS</b>	Basel-Stadt / Bâle-Ville / Basilea-Città / Basel-Stadt
<b>FR</b>	Freiburg / Fribourg / Friburgo / Fribourg
<b>GE</b>	Genf / Genève / Ginevra / Geneva
<b>GL</b>	Glarus / Glaris / Glarona / Glarus
<b>GR</b>	Graubünden / Grisons / Grigioni / Graubünden
<b>JU</b>	Jura / Giura / Jura
<b>LU</b>	Luzern / Lucerne / Lucerna / Lucerne
<b>NE</b>	Neuenburg / Neuchâtel / Neuchâtel
<b>NW</b>	Nidwalden / Nidwald / Nidvaldo / Nidwalden
<b>OW</b>	Obwalden / Obwald / Obvaldo / Obwalden
<b>SG</b>	St. Gallen / Saint-Gall / San Gallo / St Gallen
<b>SH</b>	Schaffhausen / Schaffhouse / Sciaffusa / Schaffhausen
<b>SO</b>	Solothurn / Soleure / Soletta / Solothurn
<b>SZ</b>	Schwyz / Svitto / Schwyz
<b>TG</b>	Thurgau / Thurgovie / Turgovia / Thurgau
<b>TI</b>	Tessin / Ticino
<b>UR</b>	Uri
<b>VD</b>	Waadt / Vaud
<b>VS</b>	Wallis / Valais / Vallese / Valais
<b>ZG</b>	Zug / Zoug / Zugo / Zug
<b>ZH</b>	Zürich / Zurich / Zurigo / Zurich
<b>Lausanne</b>	Stadt Lausanne / Ville de Lausanne / Città di Losanna / City of Lausanne

Politische Parteien / Partis politiques / Partiti politici / Political Parties

Die Mitte  
Le Centre  
Alleanza del Centro  
**The Centre**

EDU	Eidgenössisch-Demokratische Union
UDF	Union Démocratique Fédérale
UDF	Unione Democratica Federale
<b>EDU</b>	Federal Democratic Union
FDP	Die Liberalen
PLR	Les Libéraux-Radicaux
PLR	I Liberali Radicali
<b>FDP</b>	The Liberals
GRÜNE	GRÜNE Schweiz
VERT-E-S	Les VERT-E-S suisses
I Verdi	VERDI svizzeri
<b>Greens</b>	Swiss Green Party
SVP	Schweizerische Volkspartei
UDC	Union démocratique du centre
UDC	Unione Democratica del Centro
<b>SVP</b>	Swiss People's Party
SP	Sozialdemokratische Partei der Schweiz
PS	Parti socialiste suisse
PS	Partito socialista svizzero
<b>SP</b>	Swiss Social Democratic Party
<b>AL Bern</b>	Alternative Linke Bern
Piratenpartei	Piratenpartei Schweiz
PPS	Parti Pirate Suisse
PPS	Partito Pirata Svizzero
<b>Pirate Party</b>	Pirate Party Switzerland

## **Organisationen / Organisations / Organizzazzioni / Organisations**

Arbeitgeberverband	Schweizerischer Arbeitgeberverband
Union patronale	Union patronale suisse
Unione degli imprenditori	Unione svizzera degli imprenditori
<b>Confederation of Swiss Employers</b>	
ASO	Auslandschweizer-Organisation
OSE	Organisation des Suisses de l'étranger
OSE	L'Organizzazione degli Svizzeri all'estero
<b>OSA</b>	Organisation of the Swiss Abroad

<b>BFH</b>	Berner Fachhochschule
<b>BFH</b>	Haute école spécialisée bernoise
<b>BFH</b>	Scuola universitaria professionale di Berna
<b>BFH</b>	Bern University of Applied Sciences
<b>Centre Patronal</b>	
<b>CH++</b>	
<b>Digitale Gesellschaft</b>	
<b>digitalswitzerland</b>	
<b>DSB LU</b>	Datenschutzbeauftragter Kanton Luzern
economiesuisse	Verband der Schweizer Unternehmen
economiesuisse	Fédération des entreprises suisses
economiesuisse	Federazione delle imprese svizzere
<b>economiesuisse</b>	Federation of Swiss Business
<b>eGov</b>	eGov Schweiz
Gemeindeverband	Schweizerischer Gemeindeverband
ACS	Association des Communes Suisse
ACS	Associazione dei Comuni Svizzeri
<b>ASC</b>	Association of Swiss Communes
<b>GRI</b>	Groupement romand de l'Informatique
Inclusion Handicap	Dachverband der Behindertenorganisationen Schweiz
Inclusion Handicap	Association faîtière des organisations suisses de personnes handicapées
Inclusion Handicap	Associazione mantello delle organizzazioni svizzere che si occupano delle persone con disabilità
<b>Inclusion Handicap</b>	Umbrella Organisation for Swiss Disability Organisations
Post	Die Schweizerische Swiss Post
Poste	La Poste Suisse
Posta	La Posta Svizzera
<b>Swiss Post</b>	
privatum	Konferenz der schweizerischen Datenschutzbeauftragten
privatum	Conférence des préposé(e)s suisses à la protection des données
privatum	Conferenza degli incaricati svizzeri per la protezione dei dati
<b>privatum</b>	Conference of Swiss Data Protection Commissioners
Procap	Procap Schweiz
Procap	Procap Suisse
Procap	Procap Svizzera
<b>Procap</b>	Procap Switzerland
<b>Pro Infirmis</b>	

SAB	Schweizerische Arbeitsgemeinschaft für die Berggebiete
SAB	Groupement suisse pour les régions de montagne
SAB	Gruppo svizzero per le regioni di montagna
<b>SAB</b>	Swiss Centre for Mountain Regions
SATW	Schweizerische Akademie der Technischen Wissenschaften
SATW	Académie suisse des sciences techniques
SATW	Accademia svizzera delle scienze tecniche
<b>SATW</b>	Swiss Academy of Engineering Sciences
SBb	Schweizerischer Blindenbund
USA	Entraide des aveugles et des malvoyants
USC	Unione svizzera dei ciechi
<b>SBU</b>	Swiss Blind Union
SBV	Schweizerischer Blinden- und Sehbehindertenverband
FSA	Fédération suisse des aveugles et malvoyants
FSC	Federazione svizzera dei ciechi e deboli di vista
<b>SBV</b>	Swiss Federation of the Blind and Visually Impaired
sgv	Schweizerischer Gewerbeverband
usam	Union suisse des arts et métiers
usam	Unione svizzera delle arti e mestieri
<b>sgv</b>	Swiss Union of Crafts and Small and Medium-sized Enterprises
SKS	Stiftung für Konsumentenschutz
FPC	Fondation pour la protection des consommateurs
FPC	Fondazione per la protezione dei consumatori
<b>SKS</b>	Foundation for Consumer Protection
SSK	Schweizerische Staatsschreiberkonferenz
CCE	Conférence suisse des Chanceliers d'État
CCS	Conferenza svizzera dei Cancellieri di Stato
<b>CCC</b>	Swiss Conference of Cantonal Chancellors
SSV	Schweizerischer Städteverband
UVS	Union des villes suisses
UCS	Unione delle città svizzere
<b>SSV</b>	Union of Swiss Cities
Swico	Wirtschaftsverband der ICT- und Online-Branche
Swico	Association professionnelle pour le secteur des TIC et de l'Internet
<b>Swico</b>	Swiss Industrial Association for Information, Communication and Organisation Technology
SZBLIND	Schweizerischer Zentralverein für das Blindenwesen
UCBA	Union centrale suisse pour le bien des aveugles
UCBC	Unione centrale svizzera per il bene dei ciechi
<b>SNABLIND</b>	Swiss National Association of and for the Blind
UNIFR	Université de Fribourg
<b>UNIFR</b>	University of Fribourg

Verein E-Voting Moratorium  
Association E-Voting moratoire  
Associazione E-Voting moratorio  
**E-Voting Moratorium Association**

<b>VZGV</b>	Verein Zürcher Gemeindeschreiber und Verwaltungsfachleute ( <i>Association of Zurich Communal Chancellors and Public Administrators</i> )
Zugang für alle Accès pour tous Accesso per tutti <b>Access for All</b>	Stiftung Zugang für alle Fondation Accès pour tous Fondazione Accesso per tutti Access for All Foundation

## **Einzelpersonen / Particuliers / Privati / Individuals**

**Ardita Driza Maurer**

**Florian Moser**

**IsA** Interessensgruppe für sichere Abstimmungen (*Secure Voting Interest Group*) comprising Christian Folini, Christian Killer, Melchior Limacher (members of the core group) and co-signatories Umberto Annino, Simon Bachmann, Jan Camenisch, Nic Cantieni, Jann Deiss, Samuel Furter, Olivia Huggenberger, Marcel Keller, Burkhard Stiller and Bernhard Tellenbach

**Olivier Pereira**