



The implementation and practical operation of the e-APP: responses to the e-APP Questionnaire

Mr Caio Gomes de Freitas

Legal Officer

14th International Forum on the e-APP

Marrakech, Morocco

12-13 May

Responses received

- Questionnaire published on 17 February
- Responses were due by Friday, 17 April

50

Responses received

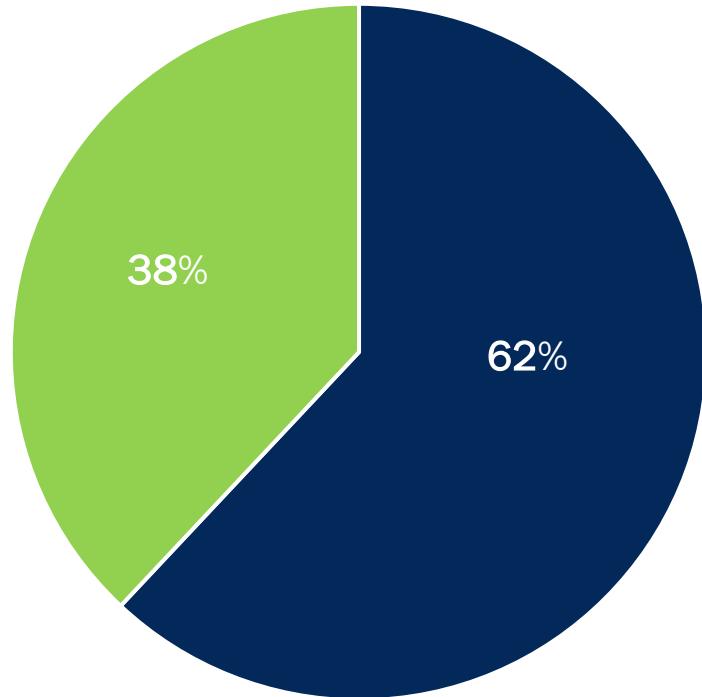
47

Contracting Parties

Implementation of the e-APP

Questions 1 to 3.1

Respondents issuing e-Apostilles



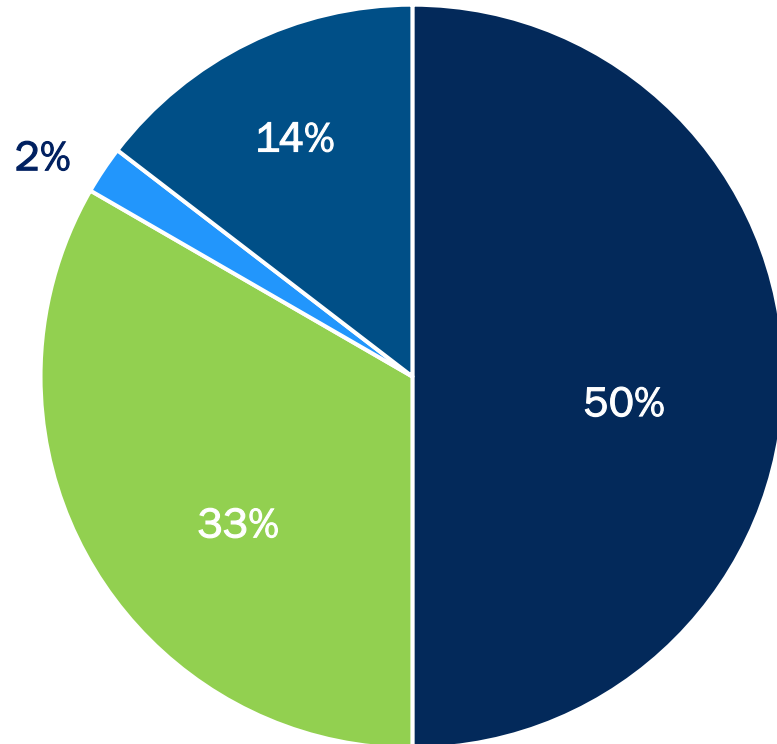
■ Yes ■ No, e-Apostilles have not been implemented yet.

31 respondents have implemented the e-Apostille component

Challenges preventing the implementation

Implementation challenges (e.g., lack of resources, lack of infrastructure)	68%
Cost	53%
System interoperability / compatibility	26%
Judicial or administrative structure	26%
Security concerns	21%
Internal law limitations	11%
Other	5%

Ability to accept and process incoming e-Apostilles



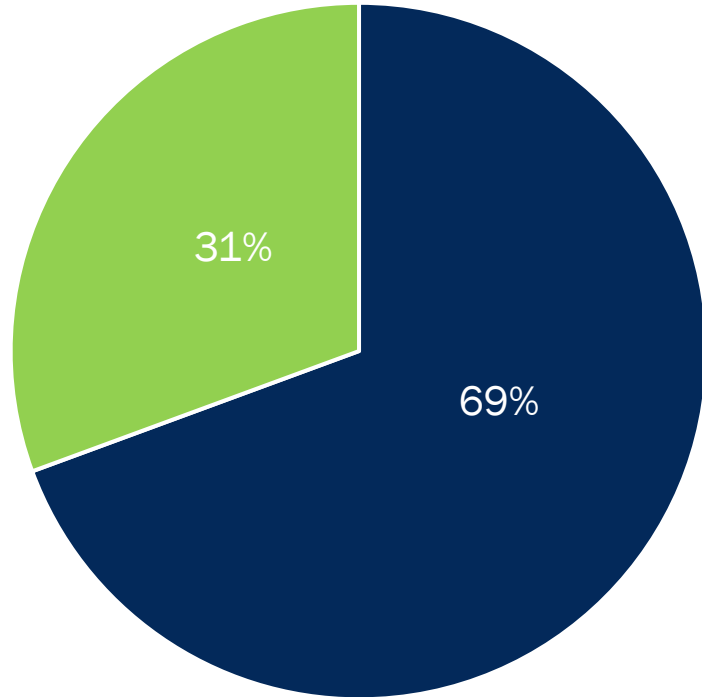
- Yes, all e-Apostilles can be processed
- Yes, but on certain conditions
- No, e-Apostilles cannot be processed
- Unknown

Conditions include:

- Verifiable via e-Register (most common)
- Permanently affixed or logically associated to the underlying public document
- Underlying document verifiable online
- Included in e-APP notification
- Printout required by some recipients

(*) Processing may vary by recipient

Respondents operating an e-Register



■ Yes ■ No, an e-Register has not been implemented yet.

34 respondents have implemented the e-Register component

Challenges preventing the implementation

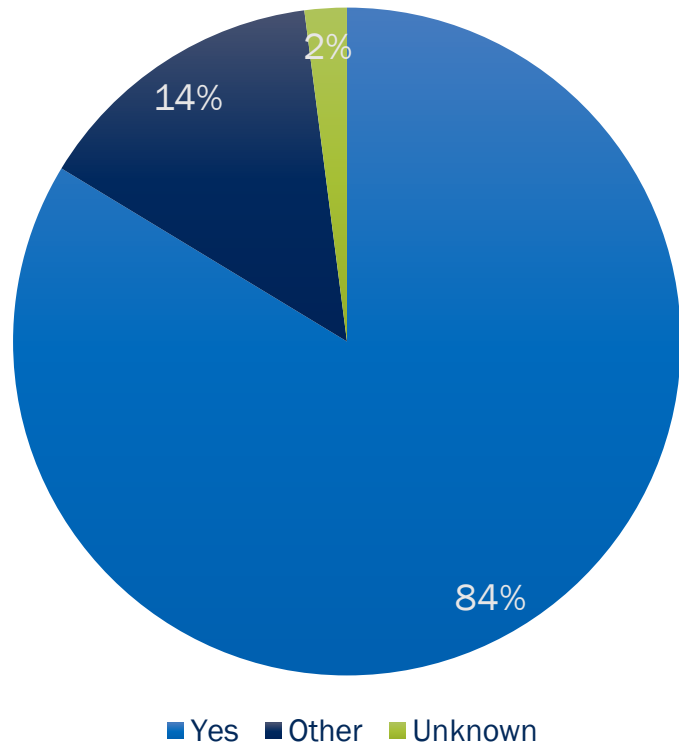
Implementation challenges (e.g., lack of resources, lack of infrastructure)	73%
System interoperability/compatibility	40%
Cost	40%
Judicial and administrative structure	26%
Security concerns	20%
Internal law limitations	13%
Other	6%

Technology and the e-APP (incl. the use of digital signatures

Questions 4 to 6.2

Functional equivalence of electronic signatures

- Rate of response: 49 responses (46 Contracting Parties)

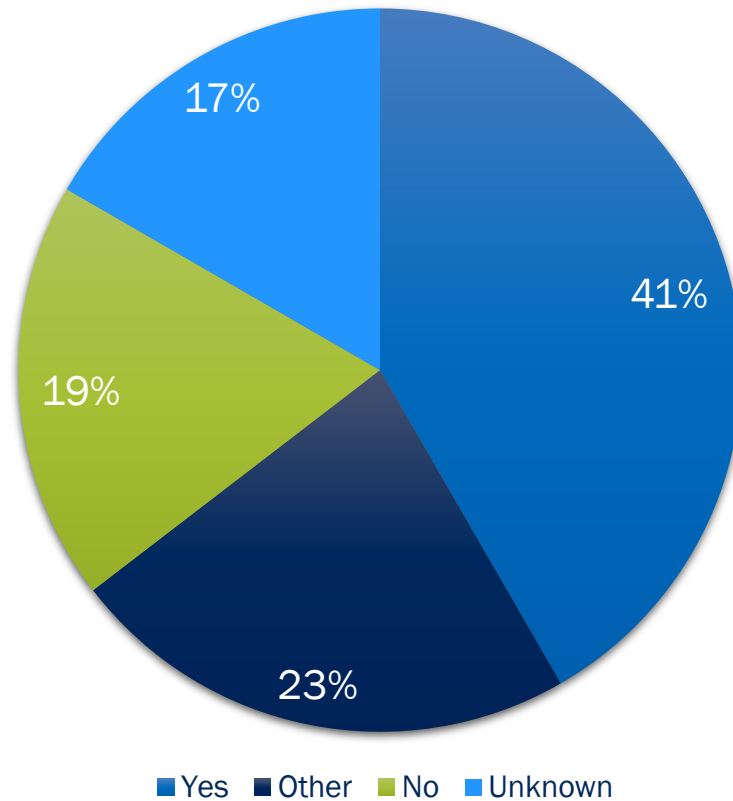


Yes, but subject to conditions:

- EU: eIDAS sets standards (e.g., qualified e-signatures)
- Signatory must be duly identified; integrity ensured
- Use of time stamps and party consent
- Depends on the type of e-signature (affects probative value)
- Some documents require manual issue/signature (domestic policy)

Electronic signatures on incoming electronic documents

- Rate of response: 48 responses (46 Contracting Parties)



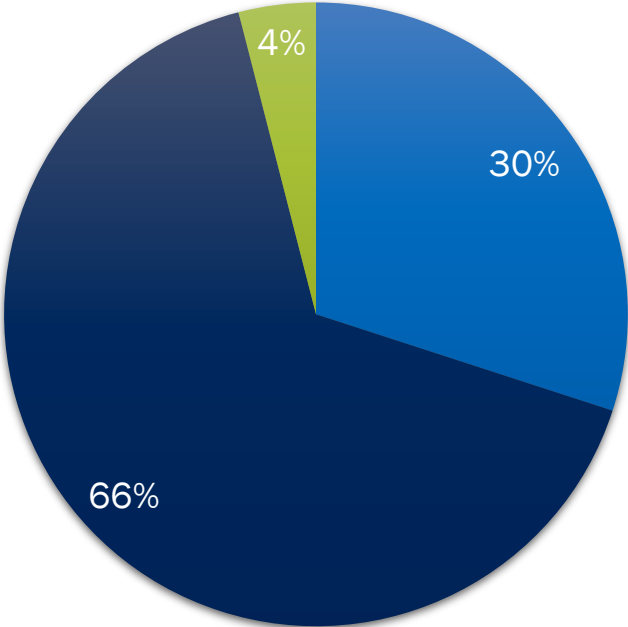
2026 e-APP Questionnaire
Question 4.1

Electronic signatures on incoming electronic documents

- Domestic legal frameworks governing electronic signatures and electronic documents
- Verification as a condition
- Technical compatibility requirements
- Type of electronic signature: qualified and advanced signatures (e.g. eIDAS standards)
- Requirements may vary depending on the type of public document

Ability to execute public documents in electronic form

- Rate of response: 50 responses (47 Contracting Parties)

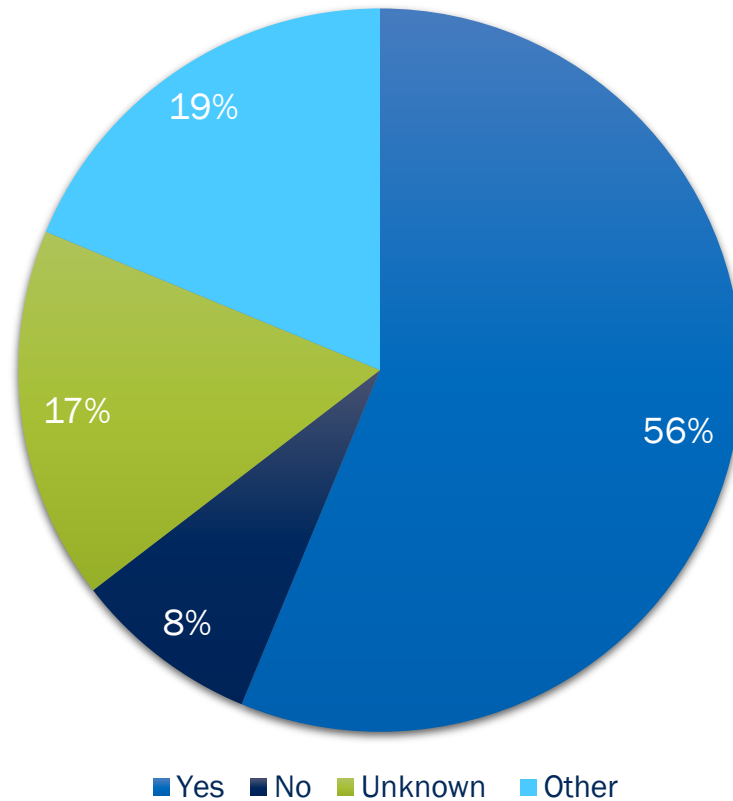


- Yes, all public documents are executed or able to be executed in electronic form
- Yes, certain categories of public documents are executed or able to be executed in electronic form
- No, public documents are never executed in electronic form

2026 e-APP Questionnaire
Question 6

Ability to verify electronic public documents

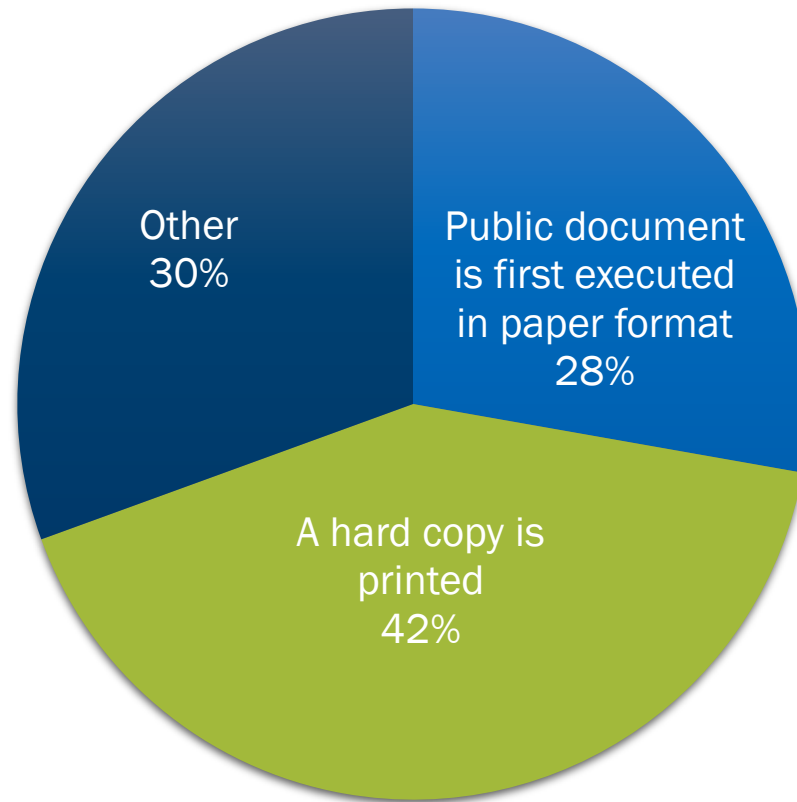
- Rate of response: 48 responses (45 Contracting Parties)



2026 e-APP Questionnaire
Question 6.1

How Apostilles are issued for electronic public documents

- Rate of response: 35 responses (33 Contracting Parties)



2026 e-APP Questionnaire
Question 6.2

Issuance of e-Apostilles

Questions 7 to 12

Requirements, conditions, or process for issuing e-Apostilles

Rate of response: 66% (29 Contracting Parties)

80%

of respondents impose some kind of requirement or have established a process for issuing e-Apostilles

Examples of requirements or conditions:

- (*) Same conditions for issuing paper and e-Apostilles (Article 3 of the Apostille Convention)
- Format of the underlying public document (e-Apostilles limited to electronic documents)
- Online application via dedicated platforms
- User account creation and/or applicant's identity verification required
- Use of electronic signatures (in some cases)
- Direct transmission and submission of the public document by issuing authority (where required)
- Some respondents limit e-Apostilles to specific categories of documents
- Domestic law and policy may restrict some documents to paper format only (and paper Apostilles)

Formats of public documents eligible for e-Apostilles

Rate of response: 64% (28 Contracting Parties)

93%

Electronic public documents

72%

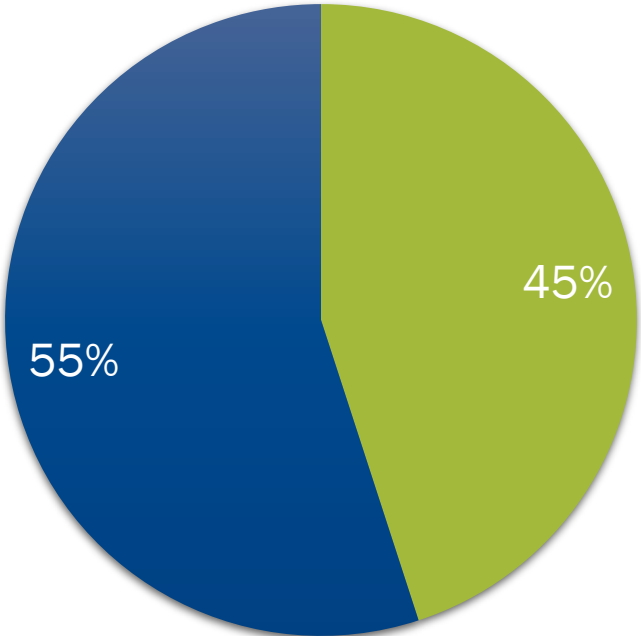
Paper public documents that have been scanned by a public official

28%

Paper public documents that have been scanned by applicants

Issuance of paper Apostilles alongside e-Apostilles

Rate of response: 68% (30 Contracting Parties)

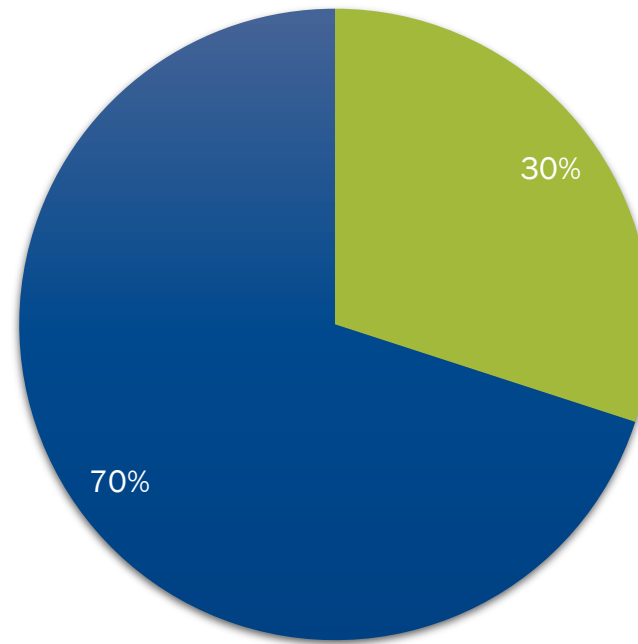


■ No, only e-Apostilles ■ Yes

2026 e-APP Questionnaire
Question 9

Preservation of the digital signature of the underlying document

Rate of response: 59% (26 Contracting Parties)



■ No, only the digital signature of the e-Apostille is preserved ■ Yes, the digital signature is preserved

2026 e-APP Questionnaire
Question 10

Additional security or technical features for e-Apostilles

- Digital watermarks
- QR codes
- Digital timestamping
- Unique tracking codes
- Hash verification
- Digital wet blue ink seals
- Printing restrictions

Operation of an e-Register

Question 13

Particulars contained in the e-Register

100%	Number and date of the Apostille (required)
95%	Name and capacity of the person signing the document and/or the name of authority whose seal or stamp is affixed (required)
63%	Name and/or type of underlying document
58%	Copy of the Apostille
55%	Copy of the underlying public document
42%	Name of the applicant
29%	Description of the contents of underlying document
21%	State of destination

Particulars contained in the e-Register

24% Other

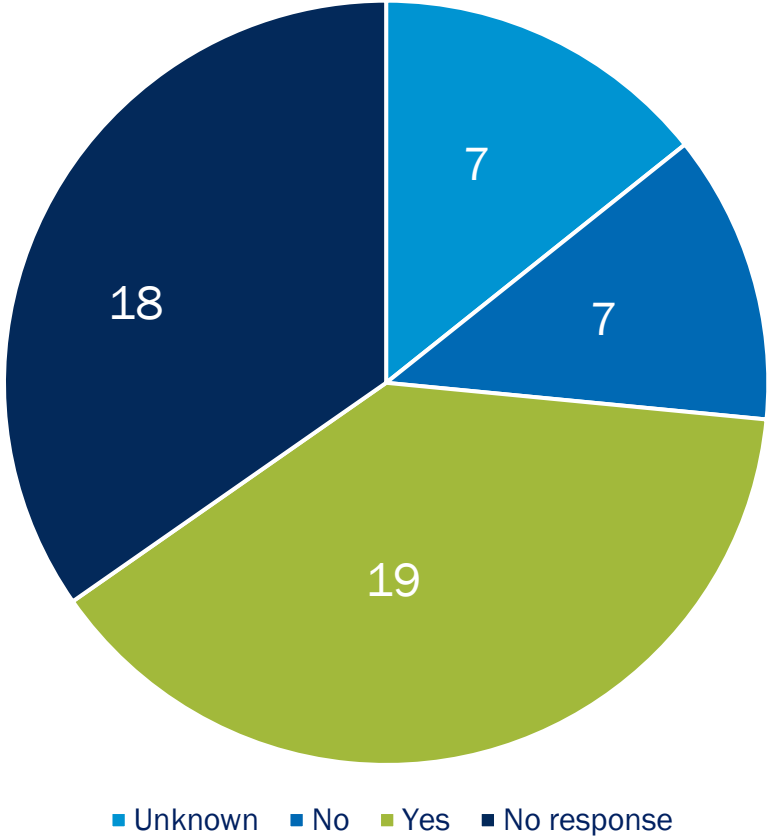
Other particulars include:

- Identification number of the applicant
- Issuing officer name and function
- Place of Issue
- Issuing date and number of the underlying public document
- Method of payment of fees
- Name of the Competent Authority

Issues with e-Apostilles

Questions 14 to 16

e-Apostilles refused by foreign recipients



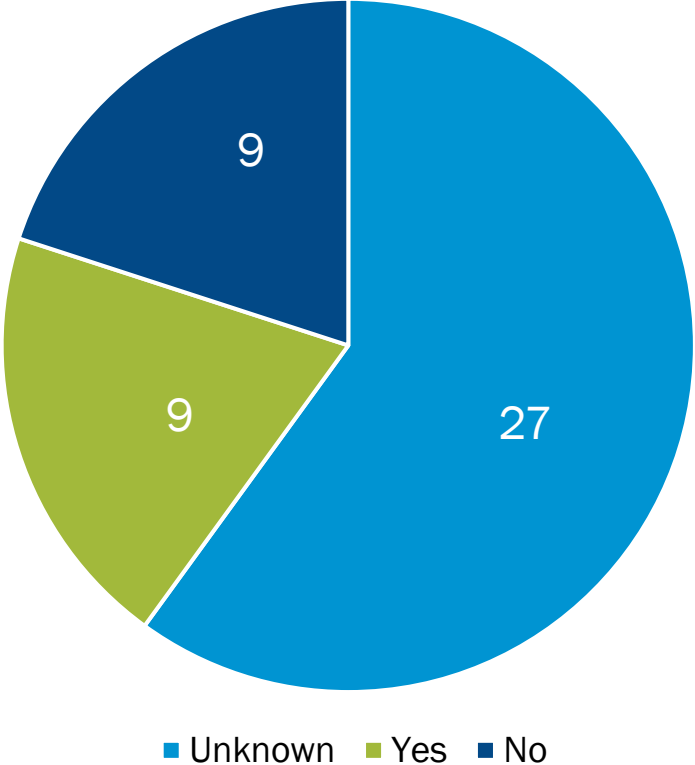
Reasons for refusal include:

- Lack of familiarity with e-Apostilles among recipients
- Limited or no systems in place to process e-Apostilles (e.g. inability to access/open files)
- Technical verification issues (e.g. inability to verify digital signatures or the e-Apostille itself)
- Requirement for paper-based documents instead of electronic formats
- Requirement for wet signatures, stamps, or other physical authentication elements

Actions taken in response

A paper Apostille was issued instead	21.2%
Contacted the receiving authority	17.0%
Contacted nearest diplomatic mission of the place of destination	17.0%
Contacted own diplomatic mission accredited to the place of destination	17.0%
Contacted the Competent Authority of the place of destination	12.7%
Unknown	10.6%
Contacted the Permanent Bureau	3.6%

Refusal of Incoming e-Apostilles



Reasons for refusal include:

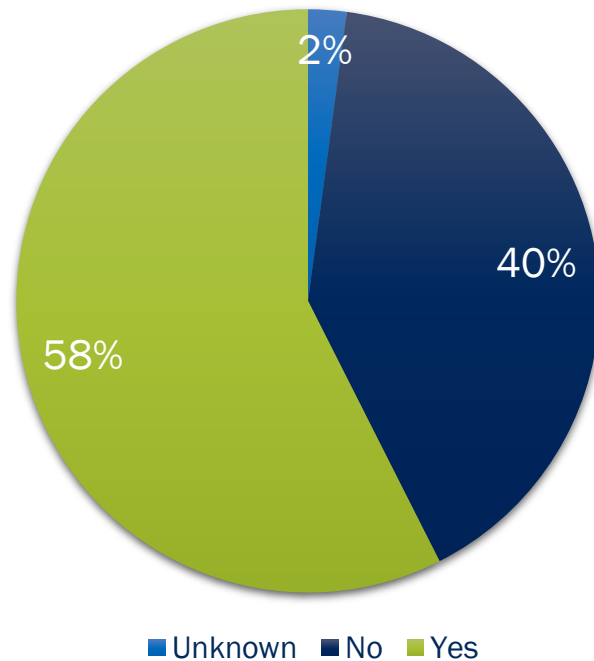
- Lack of familiarity with e-Apostilles or insufficient information on how to verify them
- Inability to clearly link the e-Apostille to the underlying document, particularly where the e-Apostille was detached, incomplete, or not accompanied by the underlying document
- Inability to verify the authenticity of the e-Apostille because access to the e-Register was unavailable or inaccessible

Education and training

Questions 17 and 18

Education and training on the e-APP for officers in the Competent Authority

Rate of response: 34% (44 Contracting Parties)

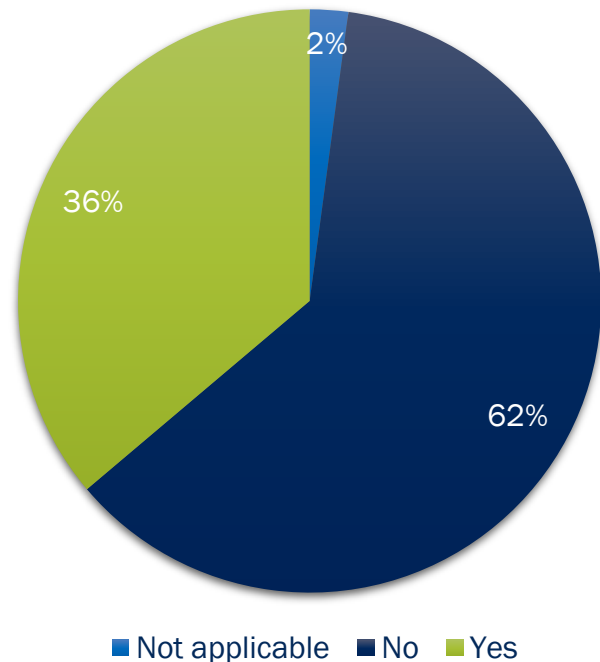


Training activities and/or guidelines include, among others:

- Development of materials for officers operating the e-APP (including FAQs)
- Instructional and informational videos
- Workshops and training sessions
- Translation and distribution of the Apostille Handbook

Education and training on the acceptance of e-Apostilles and the operation of e-Registers for recipients

Rate of response: 34% (44 Contracting Parties)



Training activities and/or guidelines include:

- Diplomatic outreach (notes to foreign missions)
- Public information (official websites)
- e-APP implementation guidelines
- Internal guidance on the acceptance of e-Apostilles and the use of e-Registers
- Workshop and training sessions
- Internal directives
- Promotional materials (e.g., leaflets, translated coversheets, access guidance)

Thank you

Mr Caio Gomes de Freitas

Legal Officer

secretariat@hcch.net