

EUROCHAMBRES Position Paper on the Framework for a European Digital Identity

EUROCHAMBRES welcomes the proposal for a framework for a European Digital Identity as an important step to secure digital identification. A trusted and secure electronic ID, based on commonly agreed standards, would be a useful tool for citizens, businesses and authorities alike. However, to achieve a true breakthrough for digital documents in Europe, Member States should be required to accept them as fully equivalent to traditional documents.

The recent Covid crisis has revealed how difficult access to public health services, such as testing, still is for EU citizens in another Member State. At the same time, the “Green Covid Certificate” has shown that Europe can overcome long standing national reservations and introduce a **pragmatic solution very quickly** if deemed necessary. We consider a similarly courageous approach necessary for electronic ID. The possibility to issue electronic IDs has existed for years, but acceptance is low, as it does not deliver any significant advantage for citizens. Currently, only 14 Member States have notified at least one eID scheme and only 59 % of EU residents have access to trusted and secure eID schemes. A true replacement for traditional ID cards, at least within the EU would be such a revolutionary advantage. It would complement the efforts of recent years to facilitate the cross border recognition of documents, for areas such as social insurance, driving licences or professional licences in the service sector.

We therefore recommend improving the proposal on establishing a framework for a European Digital Identity COM (2021) 281 final 2021/0136 (COD) by providing a list of **electronic documents** that Member States are obliged to accept as a **full equivalent** to traditional documents, starting with the following:

- national ID cards
- social insurance cards
- driving licenses
- student cards
- documents on professional qualifications as laid down in Directive 2005/36/EC
- work permits

Trust is essential for the functioning and reliance on eID. Therefore, we suggest keeping the number of entities that are entitled to issue digital credentials or electronic attestations of attributes (issuing entities according to Art 6a lit 2) low, under strict supervision and regulated by the same regulation. The legal framework should ensure that establishing the core of a person’s identity, such as their first name, second name, date of birth, national number and social insurance number) is always sourced from a state run register.

Usability is essential if it is the accepted solution among citizens and businesses. In this context, usability starts with smooth and easy initial registration procedures and ends with a quick yet secure authentication process for daily transactions, for example when citizens authenticate themselves in a web shop. This would enable all age groups to use the new tool. To this end, a future proof legal framework for such identification technology has to support different registration paths, including in-person registration and "remote onboarding procedures". It should be fully harmonised across all EU Member States to ensure fair competition. They should be recognized as "eIDAS highly compliant" as long as they prove to be secure.

For the **implementing acts** and the "**Toolbox** for a coordinated approach towards a European Digital Identity Framework", it is essential to keep worldwide interoperability in mind, especially since the European eID will set standards for cross-border acceptance of eID. Therefore, we recommend building upon existing standards or standards that are about to be published, such as OpenIDConnect, SAML and ISO 18013-5.

The **security requirements** should be defined in such a way that most citizens can use the eID and at the same time the information provided can be easily read and verified. This requires neutrality towards technology while maintaining high security standards by defining minimum standards. Therefore, instead of limiting the legal framework to one specific piece of technology, a flexible approach supporting different security components including secure elements, trusted execution environments or platform-specific solutions should be adopted.

EUROCHAMBRES – The Association of European Chambers of Commerce and Industry represents over 20 million enterprises in Europe – 98% of which are SMEs – through 45 members and a European network of 1700 regional and local Chambers.

Further information: Christoph Riedmann, Tel. +32 2 282 08 60, riedmann@eurochambres.eu
Press contact: Ms. Karen Albuquerque, Tel. +32 2 282 08 62, albuquerque@eurochambres.eu