

The national electronic identification systems published in the OJEU (Official Journal of the European Union) are digital identity systems with cross-border recognition in the public administrations of the Member States of the European Union. systems with cross-border recognition in the public administrations of the Member States of the European Union. The national validation validation platforms allow the validity of the national systems to be checked against the authentication processes of their holders in these European administrations. European administrations. Therefore, it is considered that the current electronic identification systems based on national systems, which have passed favourably the systems, which have passed favourably a peer review process of the Co-operation Network, are considered to be in compliance with the current considered to be compliant with the current requirements of the eIDAS Regulation (910/2014) and the corresponding implementing acts.

As an improvement in the review process of the eIDAS Regulation, it can be considered to extend its recognition to the private sector and to promote the use of trusted identities for all Europeans.

In this sense, it is considered necessary to extend the recognition of the current electronic identification systems published in the OJEU not only to public but also to private online transactions, without prejudice to the study of a new digital identity system based on a single, secure, European digital identity. on a single, secure, reliable and interoperable European digital identity.

It is envisaged that the two systems can coexist, leaving EU citizens to decide whether to use one or the other, depending on their particularities.

Particular mention should be made of digital identity management systems based on distributed ledger technology (DLT). ledger technology (DLT), one of the use cases being the decentralised identity model, also known as SSI (Self-sovereign identity), which seems to be regulated in the revision of the eIDAS Regulation. On the model, it is considered interesting to use the identification systems of the eIDAS Regulation published in the OJEU for the issuance of verifiable credentials developed by the international W3C community. It is desirable to use an electronic identification system in conformity with the eIDAS Regulation Regulation to ensure the reliability of the information contained in the verifiable credential. Qualified certificates could also be used to certificates could also be used to support the signatures and verifications of the verifiable credentials, increasing their legal value through their electronic sealing (European eIDAS Bridge project). (European eIDAS Bridge project). Ultimately, the verifiable credential is not considered to be notifiable as an electronic identification system since it is considered to be a method of submission of electronic documents. it is considered to be a method of submitting cardholder data, not an electronic identification scheme.

Finally, it is considered that the Regulatory Body that has been involved in the negotiation process of the eIDAS Regulation should exercise supervisory and control functions over the above-mentioned electronic identification schemes. of supervision and control of such electronic identity schemes, both those notified under Article 9(1) of the eIDAS Regulation and those resulting from the eIDAS Regulation. eIDAS Regulation, as well as those derived from the new EU digital identity system or based on decentralised identity models (DLT).

As in the case of compliance audits of trust services, it is considered necessary to carry out regular audits through Trust Service Authorities (TSAs). through Conformity Assessment Bodies (CABs) is considered necessary.