

CLR Labs

La Ciotat

CLR Labs feedback on the European Digital Identity (EUID)

European Commission's public consultation on the EU digital ID scheme for online transactions across Europe

CLR Labs is the first European Evaluation Laboratory dedicated to the evaluation of Biometrics technologies. We bring all aspects of biometrics and mobile security expertise and we cover all Biometrics technologies and their associated products, users and ecosystems. We are based in La Ciotat – South of France.

Our evaluation and testing procedures are set up according to European Accreditation Agreement rules and International Standards ISO/IEC 17025.

eIDAS has been the first regulation to cover the digital world replacing the previous electronic signature directive from 1999 and have created the first federated Digital Identity scheme in the world.

By giving a legal definition of electronic identification and electronic authentication, the European Commission and the Member states have created the first legal definition of what is the Digital Identity : it is corresponding to the sum of electronic identification (who I am) and electronic authentication (How I prove it).

This definition comes with a complete set of requirements (enrollment, issuance, usage and security measures, peer review etc.).

The eIDAS regulation has also created a legal certainty for the on-line onboarding. This has opened a completely new field of opportunities for European Start-ups and SMEs by creating new business models. We have seen since 2014 the creation of hundreds of European startups and SMEs proposing eIDAS compliant on-boarding solutions, liveness detection modules, biometrics identification and verification.

It is critical to protect these critical assets and develop further our European ecosystem by continuing to develop the current eIDAS regulation possibilities.

These current eIDAS possibilities are still not yet fully realized but are in a very good way, and European Startups and SMEs need stability and time to growth. Business Angels may be also impacted with any large revision of the eIDAS regulation and may be stopped some investments decisions in start-ups and SME's.

Any drastic change on the current eIDAS regulation will destabilized this European precious ecosystem.

CLR Labs is strongly supporting the option 1 proposed by the European Commission, the two others will create bad messages and signals to the market and may stop some current projects. The current eIDAS projects may be delayed from 2 or 3 years waiting for both the co-decision and the implementing acts are fully completed.

Furthermore, the option 2 will bring electronic identification and electronic authentication toward **server based or cloud-based solution** and removing the necessary local interaction with the user (using a mobile application, a USB token, an eID card etc...).

The user will be losing its sole control of these critical processes (identification and authentication).

Centralizing these two critical processes will benefits to global and large actors and not to the European start-ups and SMEs.

The option 1 will be helping the current eIDAS European eco-system to better benefits from the current opportunity of the current eIDAS regulation. Using implementing acts and guidelines will help in getting the fine tuning of the European interoperability.

By example, and based on our competence domain, the article 24.d would need to be complemented by a guideline mentioning that European Laboratories ISO/IEC 17025 accredited on the ISO/IEC 30107 standards (presentation attack detection) and having a serious evaluation methodology is the way to prove to the eIDAS CAB (Conformity Assessment Body) that the proposed solution is compliant against the requirements of the article 24.d.

This will be a great help to the eIDAS CAB auditors. They can rely on evaluation report issued by accredited laboratories and reduce the potential fraud linked to the identity spoofing when Biometrics verification is used (Facial recognition, Fingerprint presentation, vocal recognition etc...).

The second challenge is to make sure that the biometrics solution and the associated evaluation laboratories are GDPR compliant and are putting the right security, organizational measure to manage sensible data such as biometrics ones.

In this respect, CLR Labs has clear mission statement: Toward Biometrics certified with European Values.

We believed that a European Biometrics Certification Scheme should be prepared within the Cyber Security Certification framework of the European Cybersecurity Act. It is a question of digital sovereignty and alignment with the European Values.

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