

Dear sir/madam,

We like to thank the European Commission for this opportunity to provide input.

From our reaction you will learn that we are enthusiastic about a more ambitious agenda for the eIDAS framework. As one of Europe's cultural and market pillars, the City of Amsterdam is actively engaging in projects to enhance full participation of its citizens and visitors in our modern digital city.

From its conception, the city of Amsterdam has been home to people from all trades and all corners of the planet, resulting in an open, free, culturally diverse and creative city. Now that we have clearly entered and experienced the full impact of the digital revolution, we seek to uphold the very same values that made our city so attractive and flourishing to begin with.

We strongly believe in a people centered approach to technology. As part of our strategic alliance with [Cities for Digital Rights](#), our Deputy Mayor Touria Meliani developed an ambitious policy framework "[The Digital City](#)", based on principles that are known to enhance trust like: privacy by design, data minimization and the use of open source code by default. As one of the pilot cities, we have been active participant of the [DECODE](#) project. The City of Amsterdam also embraces four main principles providing guidance to citizens and entrepreneurs about the values and norms of the digital infrastructure. These four principles has been widely adopted in other Dutch cities through the [Association of Netherlands Municipalities](#).

Digital Identity and the eIDAS Regulation

A key concept in The Digital City is an easy to use, safe and reliable Digital Identity. Especially in this challenging episode due to restriction of public services on physical locations to our citizens, we need to provide people with an easy way to authenticate themselves in the digital realm. There is a clear and present need for an easy to use, reliable and safe authentication mechanism for public and commercial services, preventing further eroding of people's trust. This seems to be in line with a more ambitious eIDAS regulation, providing citizens in Europe with a shared electronic trust framework for their eID's.

In cooperation with other municipalities and in cooperation with initiatives from the not for profit sector and universities, the City of Amsterdam is actively pushing for a Digital Identity for all of its citizens based on the Digital Identity engine [IRMA](#). This engine allows for citizens to have a personal decentralized wallet with verified personal data to be used as attributes, credentials and attestations for the kind of data-friendly customized authentication that fits the provisions of the GDPR.

We like to point the European Commission to our positive experiences with decentralized, zero knowledge proof eID engines – providing a transparent way to separate personal data and transactions while at the same time enhancing privacy by design and data-minimization. Based on ongoing experiments and roll out of services we see a potential for these kind of eID's as part of an extended eIDAS framework.

Based on our positive experience with IRMA we can share with the European Commission our insights in ways to more strongly accommodate such technologies. We have seen the shift towards a more attribute-based approach in the current revision, but we have not seen such a clear shift towards *decentralized architectures*, where the storage of attributes is under the direct (physical) control of users, and is not under control of intermediate parties (who can then monitor who authenticates where, with which attributes). In short, we believe the eIDAS approach would benefit from privacy by design via decentralized electronic identities.

If the European Commission has an interest to learn more about our experiences and the public services we are building with these modern eID's, we are very happy to provide for a follow-up call, a demonstration or more in depth documentation.

Yours Sincerely

Ger Baron, Chief Technology Officer, City of Amsterdam