The eKYC and Identity Assurance Working Group (eKYC & IDA WG) of the OpenID Foundation welcomes the proposal of the Commission to extend the scope of eIDAS trust services by introducing a new trust service for identification, authentication and for the provision of attributes, credentials and attestations and allowing the provision of identification for devices (Option 2 in the EC Revision of the eIDAS Inception Impact Assessment). This will allow companies operating identity solutions to contribute to securing digital transactions across the EU.

The eKYC & IDA WG is a dedicated working group of the OpenID Foundation (the technical standardisation body specifying OpenID Connect and accompanying extensions). The OpenID Foundation delivers specifications for interfaces that enable interoperability between implementations, and the eKYC and Identity Assurance Working Group is focusing on use cases and extensions to OpenID Connect for communicating strong identity assurance (https://openid.net/wg/ekyc-ida/).

Most commercial identity providers have built their solutions on OpenID Connect because of its strong support for mobile platforms, ease of integration, formally proven security, and the ability to have users explicitly consent. Billions of transactions are performed every day using OpenID Connect. A significant number of identity providers, e.g. financial institutions or telecommunications operators, are also able to assert digital identities on a level comparable to eIDAS trust level substantial or high. A significant number of relying parties and their developers are familiar with OpenID Connect as it is used for Open Banking as well as their own use cases. In order to leverage the respective digital identities for the EU Single Market, we recommend the commission to endorse OpenID Connect beside SAML (which was already endorsed under Implementing Act 2015/1501) as a technical standard for eIDAS.

We would also like to mention that several Identity Providers provide access to government issued identities via OpenID Connect and even eID systems use OpenID Connect, namely itsme (Belgium), BankID (Norway, Sweden, & Finland), and France Connect (France). We think this is a strong evidence that OpenID Connect could facilitate the implementation of all options given in the inception impact assessment document.

We also know that most commercial identity providers provide a mixture of attributes maintained according to different trust frameworks and at different trust levels (just think of name vs eMail address) and even self asserted attributes for the same identity. Technical standards utilised to implement the updated eIDAS regulation should consider and support such use cases by providing a clear delineation between identity attributes verified and maintained according to different trust frameworks as well as accompanying metadata about

sources, validation process, and trust level
(https://www.slideshare.net/TorstenLodderstedt/identity-assurance-with-openid-connect).

The commission might also want to consider use cases where the digital identity of EU citizens is used beyond the boundaries of the EU. The eKYC working group focuses on an international standard that is relevant to many jurisdictions with representatives from Japan, Australia, UK, US, France, Czech, and Germany. In our experience, international use cases increase the requirement for dedicated representation of the aforementioned metadata in the technical standard for attribute provisioning in order to allow the relying party to process identity data in a robust fashion.

Since the consultation paper mentions blockchain based identity solutions, we would like to point out that technical diversity in implementations is of utmost importance for innovations. However, adoption across member states and services requires technical interoperability. That's why there is also work under way to provide a bridge between blockchain based identity solutions and relying parties via the mature and simple integration with OpenID Connect standard.

As subject matter experts in digital identity, we are thrilled with the direction eIDAS is taking and are more than happy to offer our advice in the course of targeted stakeholder interviews.