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## Feedback from: Anonymous

### Feedback reference

F548902

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### Initiative

EU digital ID scheme for online transactions across Europe ([/info/law/better-regulation/have-your-say/initiatives/12528-EU-digital-ID-scheme-for-online-transactions-across-Europe\\_en](/info/law/better-regulation/have-your-say/initiatives/12528-EU-digital-ID-scheme-for-online-transactions-across-Europe_en)).

First of all, as a private sector stakeholder, we are pleased to submit our feedback to the Commission on the future revision of the eIDAS Regulation.

We completely agree with the current limitations of the eIDAS Regulation underlined by the Commission. It is true that not all Member States offer eIDs and the usage in the private sector is limited. This is mostly due to two reasons. First, fragmented practices and standardization issues create an obstacle for cross-border activities. For example, a digital service provider, with a solid eIDAS compliant solution, cannot offer its solution as it is in all Member States since every Member State has different obligations for identity verification methods used in the qualified certificate issuances. Thus, the Regulation does not guarantee a standard way of application and this requires the provider to adapt its solution to the new regulations for every new market. This is, without a doubt, a cost-burden process. Second, there is a lack of public-private incentives. Such incentives can actually help the diffusion of eIDs in both sectors.

Considering the problematics highlighted above, we think the best answer would be a combination of Option 1 and Option 2. Option 1 suggests complementing the existing eIDAS framework with additional acts and guidelines on the application of specific provisions of the eIDAS Regulation. This can, surely, ease the cross-border problems that the private sector is encountering. However, the guidelines and indications should be clear enough not to let space for different interpretations by national competent authorities and enhance further harmonization. Extending the scope of eID regulation to the private sector, as Option 2 suggests, introducing new trust services for identification, authentication, and for the provision of attributes, credentials and attestations and allowing the provision of identification for devices would definitely create new business opportunities. Here again, the standardization of interfaces and the interoperable frameworks are two crucial aspects, which should be the main focus.

On the other hand, we think that the Option 3 could go against the objectives of previous options since it will establish an additional eID mechanism, which requires the Member States to adopt along with the national eID schemes. The voluntary basis applications always tend to bring diversified applications and disrupt the harmonization and standardization efforts. Moreover, it is to be considered that today not all the Member States notified their eID schemes. This is, partially, because the adaptation of infrastructures takes time and mostly because there are still some blur points on the application of these schemes; there is a lack of willingness to diffuse the application among public services, and there is a significant absence of private sector usage. It is more likely to these issues manifest themselves also for the European Digital Identity scheme (EUid). Therefore, the priority should be assuring the correct and efficient functioning of national eID schemes and increase interoperability among them.

Finally, in our opinion, the revision should focus on perfecting the eIDAS Regulation's shortfalls by preparing clear, well-defined technology-neutral guidelines, which will help to create new business opportunities for the private sector and enhance the cross-border activities; and by working on the improvement of interoperability of national eID schemes extending their application fields, which is limited under today's circumstances. More ambitious interventions like Option 3 could be an option only when the EU will have a well-functioning eID framework all over its territory.

Sincerely

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