

The proposed extension of Qualified Trusted Services to include identification and authentication services as a separate QTS is a very positive signal. a very positive signal. These services are absolutely necessary in many use cases and already form the cornerstone for many trust services as individual modules. foundation stone for many trust services. Here, however, a uniform Europe-wide definition of the level of assurance of the identification and authentication procedures and their applicability as procedures for qualified trust services. in order not to continue to be confronted with purely national regulations.

Likewise, the extension of the eID regulations to the private sector (cf. option 2) is a good approach to promote the introduction of new and the recognition of existing trust services for identification. In the area of digital identity providers, we see a Europe-wide fine-tuned regulatory intervention as particularly important, so that the level-of-assurance determination for private sector digital identity services does not undermine the security of existing notified eIDs or established secure identification procedures. identification procedures. The goal must be to establish the independent qualified trust services mentioned above. In doing so, it should be ensured that an initial identification is based on up-to-date data and secure identification procedures. A distinction should be made between qualified identification and authentication services. It is also important to prevent the The use of existing trust services (e.g. use of the electronically qualified signature as an identification method) should be qualified signature as a substitute for identification) must be prevented.

However, in the proposed options, the Commission neglects the existing qualified trust services in comparison to the the eID elements of the eIDAS Regulation. This leaves the existing barriers to competition unaddressed. Due to the lack of a Europe-wide legal framework regarding the permitted areas of use in which qualified trust services can develop their legal effectiveness, and the legal effectiveness, and the very high costs for obtaining and maintaining a qualification, qualified trust services will continue to be a niche market. trust services will continue to eke out a niche existence. Economic use is largely impossible or only possible by switching to countries with the lowest certification requirements. countries with the lowest certification requirements. Regulations must be found here so that the application landscape does not continue to be national regulations do not continue to fragment the application landscape and that a truly European market for trust services can market for trust services can emerge.

Furthermore, it is desirable to create a Europe-wide standardisation of the certification processes, in order to achieve a Europe-wide standardisation in this area as well. level playing field throughout Europe. It must be ruled out that the respective national supervisory authorities and certification bodies can national supervisory authorities and certification bodies interpret the ETSI standards on which each test is based in a different way, resulting in massive differences in the requirements to be implemented. differences in the requirements to be implemented.