

# eIDAS Open Public Consultation

Fields marked with \* are mandatory.

## 1

### Introduction

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Digital identity enables transactions in the digital world. In a hyper connected world, the ability to establish individual identities of natural persons, legal entities, machines and devices uniquely, accurately, quickly and securely is going to be critical and has a considerable potential for wealth creation.

The COVID-19 crisis clearly demonstrates the need to provide all European citizens and businesses quickly with a universally accepted, trusted digital identity and with trust services such as eSignatures to allow for seamless business continuity in the Single Market and to access to crucial and sensitive public online services such as in eHealth, eGovernment or eJustice. Universally accepted trusted identification and authentication enables effective protection of personal data in the online world. At the same time, it promotes business cases based on a discretionary disclosure of data and creates the conditions for a responsible and accountable management of data and artificial intelligence in society. Using these opportunities contributes to the recovery of the European economy and to the European digital autonomy. The revision of the eIDAS Regulation is therefore part of the Commission's response to the crisis.

With the adoption of the [eIDAS Regulation](#) in 2014, the EU broke new ground globally by introducing a first cross-border framework for trusted digital identities and the so-called trust services such as electronic signatures that can be used to sign documents in the online world, much like one signs a document with a pen in the offline world. The eIDAS Regulation is meant to ensure secure and seamless electronic interaction between citizens, businesses and public authorities. This should increase trust in the internal market and make online services more effective. The European Commission is currently evaluating this regulatory framework.

The eIDAS Regulation ensures:

- that individuals and businesses can use their own national electronic identification schemes (eIDs) to authenticate when accessing public online services in other EU Member States. This is achieved by establishing an interoperability framework and by enforcing mutual legal recognition of notified schemes;
- the development of a European internal market for electronic Trust Services (electronic signatures, electronic seals, time stamps, electronic delivery services and website authentication) recognised across borders with the same legal status as traditional paper based processes.

The Commission will assess to what extent the eIDAS framework remains fit for purpose, i.e., to deliver the intended outcomes, results and impacts and whether it is appropriate to modify the scope of the Regulation or its specific provisions, taking into account the experience gained in the application, as well as

technological, market and legal developments.

In its Communication on Shaping Europe's Digital Future, published on 19th February 2020, the Commission took the position that universally accepted public electronic identity (eID) is necessary for consumers to have access to their data and securely use the products and services they want without having to use unrelated platforms to do so and unnecessarily sharing personal data with them. The Commission will consider revising the eIDAS Regulation to improve its effectiveness, extend its benefits to the private sector and promote trusted digital identities for all Europeans.

The aim of this public consultation is to collect feedback on drivers and barriers to the development and uptake of eID and trust services in Europe and on the impacts of the options for delivering an EU digital identity. It targets broad public (e.g. citizens and end-users, including older persons and persons with disabilities) as well as companies directly impacted by the eIDAS Regulation (e.g. trust service providers, identity providers), competent authorities in the Member States, international organisations and concerned stakeholders on the eIDAS framework.

## 2 About you

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### \* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ Gaelic
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian

- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

\* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

\* First name

FILIP

\* Surname

CORVELEYN

\* Email (this won't be published)

FILIP.CORVELEYN@LEGALSTUDIO.BE

\* Scope

- ☒ International
- ☐ Local
- ☐ National
- ☐ Regional

\* Organisation name

*255 character(s) maximum*

\* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#) It's a voluntary database for organisations seeking to influence EU decision-making.

\* Country of origin

Please add your country of origin, or that of your organisation

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| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
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| <input type="radio"/> Barbados                         | <input type="radio"/> Gabon                               | <input type="radio"/> Monaco         | <input type="radio"/> South Korea                                  |
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| <input type="radio"/> British Virgin Islands           | <input type="radio"/> Guyana                              | <input type="radio"/> Niger          | <input type="radio"/> The Gambia                                   |
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| <input type="radio"/> Cocos (Keeling) Islands  | <input type="radio"/> Japan                             | <input type="radio"/> Philippines              | <input type="radio"/> United States Minor Outlying Islands |
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| <input type="radio"/> Congo                    | <input type="radio"/> Kazakhstan                        | <input type="radio"/> Portugal                 | <input type="radio"/> Uzbekistan                           |
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| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho    | <input type="radio"/> Saint Kitts and Nevis                       | <input type="radio"/> Zimbabwe          |
| <input type="radio"/> Denmark                          | <input type="radio"/> Liberia    | <input type="radio"/> Saint Lucia                                 |   |

#### \* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

##### ☐ **Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

##### ☒ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☒ I agree with the [personal data protection provisions](#)

### 3 General questions about electronic identification (eID)

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Individuals and businesses can use under eIDAS their own national electronic identification schemes (eIDs) (e.g. government issued eID cards/Apps) to authenticate when accessing public online services in other EU Member States. This is achieved by establishing interoperability of different national eIDs and enforcing mutual legal recognition of notified schemes.

In the context of this consultation, an eID is a means of electronic identification (it ascertains “who you are”) and authentication (it proves that “you are who you say you are”) issued by an organisation to be used in a wide range of online services provided by different organisations. A national identity card that can be used

in eGovernment services provided by several agencies, or a social network login account that you can use in several online shops would qualify as eIDs, but the credentials given to you by your bank to access exclusively their online banking services would not.

\* Do you have an electronic identification means (eID) which can be used to access online services?

- ☒ Yes
- ☐ No
- ☐ Don't know

What type(s) of eID do you use?

- ☒ eIDs provided by my government or other public authority
- ☐ Personal user accounts provided by social networks or online platforms
- ☐ eIDs provided by other private sector organisations (e.g. trust service providers, banks, mobile operators)
- ☐ Other

If other please specify:

\* How often do you use your eID to access or use online services?

- ☐ Everyday
- ☐ Once or twice a week
- ☒ Once a month
- ☐ Less than once a month
- ☐ Never
- ☐ I don't know / no opinion

For what services do you use or would you like to use your eID?

	I already use my eID	I would like to use my eID
Public services (e.g. fill in your tax form, request certificates, ...)	<input type="radio"/>	<input checked="" type="radio"/>
Utility services (energy, water supply), telecom services	<input type="radio"/>	<input type="radio"/>
Medical (eHealth) services	<input type="radio"/>	<input type="radio"/>
Open a bank account	<input type="radio"/>	<input type="radio"/>



Access online platforms (e.g. social networks, my online streaming account)	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>

\* Have you found the availability of the eID means or the electronic trust services (e.g. electronic signature) particularly useful during the lockdown measures introduced due to the COVID-19 crisis?

☒ Yes  
☐ No

If yes, what solutions have you used and for what services?

	eIDs provided by my government or other public authority	eIDs provided by other private sector organisations	Personal user accounts provided by social networks or online platforms	Electronic signature	Other electronic trust services (e.g. eSeals, Time Stamps)
Online public services (eGovernment)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
eHealth services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COVID-19 specific online services (e.g. reporting symptoms, test results, requesting benefits/allowance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Concluding contracts remotely	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Online shopping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If Other, please specify:

\* If no, what was the reason?

- ☐ I do not have them or could not get one (e.g. face to face interaction was needed to obtain/activate/renew an eID/eSignature certificate during the lockdown)
- ☐ The online services I would need to use are not available for my eID / eSignature tools
- ☐ I could not access the online services I would need due to usability / technical issues (e.g. lack of a card reader, software incompatibility, accessibility barriers for persons with disabilities)
- ☐ Lack of trust
- ☐ Other

If Other, please specify:

The eIDAS Regulation ensures that individuals and businesses can use their own national electronic identification schemes (eIDs) to authenticate when accessing public online services in other EU Member States. This is achieved by establishing interoperability and enforcing mutual legal recognition of the so-called notified schemes. The list of notified national eID schemes is published [here](#).

\* Are you aware that you can use one of the notified national eID schemes to access online public services in other EU Member States?

- ☒ Yes
- ☐ No

\* If you have one of these notified eIDs - have you ever used it to access online services in another EU Member State than your country of residence?

- ☐ Yes
- ☐ No
- ☒ Don't know

How important for you is the ability to use your eID to access public services in other EU Member States?

- ☐ Very important
- ☒ Somewhat important
- ☐ Not really important
- ☐ Don't know

\* How important for you is to have a secure single digital ID that could serve for all online services (both public and private) that provides you with the control over the use of your personal data?

- ☒ Very important
- ☐ Somewhat important
- ☐ Not really important
- ☐ Don't know

\* How important for you is the ability to use your eID on your mobile phone?

- ☐ Very important
- ☒ Somewhat important
- ☐ Not really important
- ☐ Don't know

#### 4 General questions about electronic trust services

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The eIDAS Regulation aimed to create a European internal market for electronic trust services - namely electronic signatures, electronic seals, time stamp, electronic delivery service and website authentication - by ensuring that they will work across borders and have the same legal status as traditional paper based processes.

\* Have you ever used electronic trust services (e.g. eSignature, eSeal or Timestamp)?

- ☒ Yes
- ☐ No
- ☐ Don't know

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor	Disagree	Strongly disagree	I don't know / no
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* The availability and offer of electronic trust services in the EU is <b>sufficient</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The eIDAS Regulation needs to be strengthened as a response to the COVID-19 crisis	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Providing the same legal effect to electronic trust services (e.g. qualified e-signature is equivalent to handwritten one) helped increase their <b>take-up</b> .	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I feel more comfortable and confident to use electronic trust services now compared to five years ago.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Public administrations should roll out more public services, making better use of electronic trust services in their contact with citizens and businesses.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* Do you think that additional trust services should be regulated at EU level?

- ☐ Yes  
☐ No  
☒ Don't know

\* If yes, please specify the additional trust services:

## 5 Specific questions on electronic identity (eID)

To answer these more specific questions would require a certain knowledge of the eIDAS Regulation.

\* Would you like to answer more specific questions about rules on eID under the eIDAS Regulation and the future digital identity?

- ☒ Yes  
☐ No

\* Are you replying as:

- ☐ End-user of eID (e.g. citizen, company)
- ☐ Provider of online services (public sector)
- ☒ Provider of online services (private sector)
- ☐ Provider of Identity and Authentication solutions and / or technologies and IT solutions in this area (e.g. software, hardware, services)
- ☐ Think tank, research, academic institution or individual expert
- ☐ Trade/business/professional association or other interest representation organisation
- ☐ Public policy maker
- ☐ Non-governmental organisation
- ☐ Other

\* If Other, please specify:

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The <b>number of online public services</b> to be accessed in a cross-border context by using one of the <a href="#">published</a> national eID schemes has considerably increased due to eIDAS.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation provides an <b>adequate legal framework</b> for cross-border electronic identification in Europe.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS legal framework for cross-border electronic identification in Europe should be strengthened as a response to the COVID-19 crisis.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The scope of the eIDAS Regulation should be extended to provide a <b>level playing field</b> for the private economic actors operating in the field of	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The interoperability framework established by the eIDAS is optimal and supports sufficiently the mutual recognition of the eID schemes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Do you agree that the use of electronic identification to access online public services across borders contributes to:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
Enhancing user friendliness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Saving time	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Saving money	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The simplification of the administrative procedure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An increase of service quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An increase of service security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The protection of personal data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The better access to services in another EU country	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An increase of the certainty on the authenticity of the users' identity	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Enhancing clarity on the liability of the provider of the electronic identity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The access to services to a larger group of users thanks to the uptake of eID	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* In your opinion, are there currently any factors limiting the cross-border use of electronic identification?

☒ Yes

☐ No

☐ Don't know

\* What are the factors limiting the cross-border use of electronic identification?

### Lack of awareness

- ☐ No need for it / Not relevant
- ☐ Limited number of notified eID schemes
- ☐ Lack of availability of relevant public services
- ☐ Lack of trust
- ☐ Preference for paper-based solutions or face-to-face interactions
- ☐ Too expensive
- ☐ Too complicated / not user-friendly / accessibility barriers for persons with disabilities
- ☐ Privacy concerns
- ☒ Legal obstacles (example: face-to-face interaction required by national legislation)
- ☐ Limited scope of eID schemes notified under the eIDAS Regulation (governmentally issued/recognised eIDs only)
- ☒ Suboptimal interoperability framework
- ☐ Other

If Other, please specify:

**\* To what extent do you agree that the eIDAS Regulation has achieved its objectives with regard to electronic identification?**

The objectives were: to enhance trust in electronic transactions in the internal market by providing a common foundation for secure and seamless electronic interaction between citizens, businesses and public authorities, thereby increasing the effectiveness of public online services in the EU.

The Regulation ensures that individuals and businesses can use their own national electronic identification schemes (eIDs) to authenticate when accessing public online services in other EU Member States, by establishing interoperability and enforcing mutual legal recognition of notified schemes.

- ☐ Strongly agree
- ☐ Agree
- ☒ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ I don't know / no opinion

Please elaborate on how the eIDAS Regulation has/not achieved its objectives with



Do not hesitate to further elaborate on your previous answers.

\* In your opinion, should the eIDAS Regulation or its implementation be improved?



Yes



No



Don't know

Which of the following corrective actions should be taken?



Adopting guidelines to improve legal coherence and consistency



Further harmonisation through requirements established in secondary legislation (implementing acts), standardisation and the introduction of certification to the advantage of particularly convenient and secure solutions



A shift from voluntary to mandatory notification of national eID schemes



An obligation for Member States to make authentication available to the private sector



Introduction of new private sector digital identity trust services for identification, authentication and provision of attributes



Introduction of an obligation for the public sector to recognise attributes, credentials and attestations issued in electronic form by trust service providers and public authorities registered as authoritative sources



Introduction of an obligation for the private sector to recognise trusted digital identities: eIDs notified under eIDAS and trust services for identification, authentication and provision of attributes



Provision of identification for non-human entities (e.g AI agents, IoT devices)

\* In your opinion, should there be a single and universally accepted European digital identity scheme, complementary to the national publicly issued electronic identities, allowing for a simple, trusted and secure possibility for citizens to identify themselves online?



Yes



No



Don't know

\* Which possible advantages of such single and uniform European digital identity scheme are important to you?

- ☒ Trust (Government Sponsored)
- ☒ Universal Acceptance
- ☒ User convenience
- ☒ Better control of personal data
- ☐ Increased online security
- ☒ Cost savings thanks to economies of scale
- ☐ Other

Please specify and/or set-out other possible advantages:

\* Which possible dis-advantages of such single and uniform European digital identity scheme are you concerned of?

- ☒ Complexity of set-up and Governance
- ☐ Lack of flexibility to adapt to technological developments and changing user needs
- ☐ Overlap with existing solutions
- ☐ Discouragement of innovation and investments into alternative eID solutions
- ☐ State surveillance concerns
- ☒ Set up and operational costs
- ☐ Other

Please specify and/or set-out other possible dis-advantages:

Please share any additional statements, documents, position papers concerning eID under the eIDAS framework and the future of digital identity.

The maximum file size is 1 MB

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To answer these more specific questions would require a certain knowledge of the eIDAS Regulation.

\* Would you like to answer more specific questions about trust services and the eIDAS Regulation?

☒ Yes

☐ No

\* Are you replying as:

- ☒ User of electronic trust services (e.g. citizen, company, public or private service provider)
- ☐ Provider of electronic trust services
- ☐ Supplier of technologies and IT solutions for electronic trust services (e.g. software, hardware, services)
- ☐ Think tank, research, academic institution or individual expert
- ☐ Trade/business/professional association or other interest representation organisation
- ☐ Public policy maker
- ☐ Supervisory body
- ☐ Conformity assessment body
- ☐ Non-governmental organisation
- ☐ Other

\* If other, please specify:

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\* Which of the following trust services are relevant to you?

The selected trust services will trigger separate questions for each trust service regulate under eIDAS

- ☒ Electronic signature
- ☐ Electronic seal
- ☐ Electronic timestamp
- ☐ Electronic registered delivery service
- ☐ Website authentication

To what extent do you agree or disagree with the following statements?

--	--	--	--	--	--	--

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The eIDAS Regulation increased the <b>availability</b> of electronic trust services in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The level and scope of <b>governance and supervision</b> of electronic trust services established under the eIDAS Regulation are <b>adequate</b> to ensure harmonisation at EU level.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS Regulation has put in place conditions conducive to trust services based on <b>decentralised solutions</b> (including through distributed ledger technologies).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>legal effect</b> provided to trust services by the eIDAS Regulation (e.g. qualified e-signature is equivalent to handwritten one) helped increase their <b>admissibility</b> in legal proceedings.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The cross-border <b>legal effect</b> provided to trust services by the eIDAS Regulation helped increase their <b>take-up</b> .	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The <b>assessment</b> procedure for becoming a <b>qualified</b> trust service provider is <b>adequate</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation is a more <b>effective tool</b> to regulate trust services than actions taken at national level.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The provisions of the eIDAS Regulation on trust services have <b>enhanced trust</b> in electronic transactions.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*						

Repealing the eIDAS Regulation would have negative consequences for trust services in Europe.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The eIDAS Regulation has increased the <b>availability</b> of <b>electronic signature</b> in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The <b>availability</b> of <b>electronic signature</b> in the EU should be extended as a result of the COVID-19 crisis	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The <b>use</b> of <b>electronic signature</b> has increased in Europe for the last 3 years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS regulatory framework creates a <b>level playing field</b> for <b>electronic signature</b> in Europe.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS Regulation does not hinder <b>technological developments</b> in the <b>electronic signature</b> market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Citizens, businesses and public administrations in Europe can <b>effectively benefit</b> from the <b>advantages</b> of <b>electronic signature</b> .	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS Regulation has ensured <b>interoperability</b> of <b>electronic signature</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
*						

The eIDAS Regulation has increased the <b>availability</b> of <b>electronic seal</b> in the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>availability</b> of <b>electronic seal</b> in the EU should be extended as a result of the COVID-19 crisis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>use</b> of <b>electronic seal</b> has increased in Europe for the last 3 years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS regulatory framework creates a <b>level playing field</b> for <b>electronic seal</b> in Europe.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation does not hinder <b>technological developments</b> in the <b>electronic seal</b> market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Citizens, businesses and public administrations in Europe can <b>effectively benefit from the advantages</b> of <b>electronic seal</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation has ensured <b>interoperability</b> of <b>electronic seal</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The eIDAS Regulation has increased the <b>availability</b> of <b>electronic timestamp</b> in the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>availability</b> of <b>electronic timestamp</b> in the EU should be extended as a result of the COVID-19 crisis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>use</b> of <b>electronic timestamp</b> has increased in Europe for the last 3 years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS regulatory						

<b>playing field for electronic timestamp</b> in Europe.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation does not hinder <b>technological developments</b> in the <b>electronic timestamp</b> market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Citizens, businesses and public administrations in Europe can <b>effectively benefit from the advantages of electronic timestamp</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation has ensured <b>interoperability of electronic timestamp</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The eIDAS Regulation has increased the <b>availability of electronic registered delivery service</b> in the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>availability of electronic registered delivery service</b> in the EU should be extended as a result of the COVID-19 crisis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The <b>use of electronic registered delivery service</b> has increased in Europe for the last 3 years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS regulatory framework creates a <b>level playing field for electronic registered delivery service</b> in Europe.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation does not hinder <b>technological developments</b> in the <b>electronic registered delivery service</b> market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Citizens, businesses and public						

effectively benefit from the advantages of electronic registered delivery service.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The eIDAS Regulation has ensured interoperability of electronic registered delivery service.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

To what extent do you agree or disagree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* The eIDAS Regulation has increased the <b>availability of website authentication</b> in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The <b>availability of website authentication</b> in the EU should be extended as a result of the COVID-19 crisis	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The <b>use of website authentication</b> has increased in Europe for the last 3 years.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS regulatory framework creates a <b>level playing field for website authentication</b> in Europe.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS Regulation does not hinder <b>technological developments</b> in the <b>website authentication</b> market.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Citizens, businesses and public administrations in Europe can <b>effectively benefit from the advantages of website authentication</b> .	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The eIDAS Regulation has ensured <b>interoperability of website authentication</b> .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* Please specify which additional trust services should be regulated at EU level:

☒ Electronic identification and authentication



Provision of trusted attributes (uniquely linked to a verified identity – e.g. proof-of-age, credentials – professional qualifications, entitlements – Know-Your-Customer)

- ☐ eArchiving
- ☐ Delegated management of signature keys
- ☐ Operation of distributed ledgers storing electronic evidences
- ☐ Operation of identity hubs storing personal data of behalf of the users
- ☐ Other
- ☐ No need for additional trust services, the current scope is sufficient

\* If other, please specify:

Do you agree that the use of trust services established by the eIDAS Regulation contributes to:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I don't know / no opinion
* Enhancing user friendliness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Saving time	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Saving money	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The simplification of the administrative procedure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An increase of service quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* An increase of service security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The protection of personal data	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* Do you think the legal effect provided to electronic documents by the eIDAS Regulation has effectively increased their take-up and admissibility in legal proceedings?

Art. 46 of the eIDAS regulation states that "An electronic document shall not be denied legal effect and admissibility as evidence in legal proceedings solely on the grounds that it is in electronic form."

- ☐ Strongly agree
- ☐ Agree
- ☒ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ I don't know / no opinion

\* In your opinion, are there any factors limiting the use of electronic trust services?

- ☒ Yes
- ☐ No
- ☐ Don't know

\* What are the factors limiting the use of electronic trust services?

- ☐ Lack of awareness
- ☐ No need for it / Not relevant
- ☐ Lack of availability for relevant services
- ☒ Lack of trust or fraud concerns
- ☒ Preference for paper-based solutions or face-to-face interactions
- ☐ Too expensive
- ☐ Too complicated / not user-friendly / accessibility barriers for persons with disabilities
- ☒ Privacy concerns
- ☒ Not enough legal certainty
- ☐ Other

\* If Other, please specify:

\* To what extent do you agree that the eIDAS Regulation has achieved its objectives with regard to electronic trust services?

The objectives were to seek to enhance trust in electronic transactions in the internal market by providing a common foundation for secure and seamless electronic interaction between citizens, businesses and public authorities, thereby increasing the effectiveness of public and private online services, electronic business and electronic commerce in the EU.

The Regulation ensures the development of a European internal market for electronic Trust Services (electronic signatures, electronic

- ☐ Strongly agree
- ☐ Agree
- ☒ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ I don't know / no opinion

Please elaborate how the eIDAS Regulation has/not achieved its objectives with regard to electronic trust services.

Do not hesitate to elaborate on your previous answers.

How could the eIDAS Regulation or its implementation be improved with regard to trust services?

Please share any additional statement, document, position paper regarding trust services and eIDAS.

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

***Please elaborate how the eIDAS Regulation has/not achieved its objectives with regard to electronic trust services.***

*Disclaimer: we will talk about only e-signature*

*The current legal framework has not yet reached an optimal level of harmonization in relation to e-signature. National governments' interpretations of the Regulation have complicated the validity and recognition of the electronic signatures between Member States - for instance by restricting the use of electronic signatures to some categories of documents - thus impeding the consolidation of a single internal market for online corporate services.*

*The interoperability of electronic signature has not been proved sufficient under the current legal framework. In our experience, although in certain Member States e-signature is widely used and accepted, local electronic signature services are better supported and accepted by the national authorities.*

*Corporate compliance could be better handled if the digital signature signed in one MS could be legally recognizable in any other MS, with great benefits for the companies in terms of time and cost savings. The benefits deriving from the use of e-signature are undermined by the need of handwritten signatures for certain corporate processes. For instance, the director of a company is allowed to sign an officer change resolution electronically in the Netherlands but still needs to sign the filing form with the chamber of commerce with a wet signature.*

*Electronic signature is also limited by the legal obligation to be physically present while signing a document for identity authentication purposes. As to documents that require notarization, most Member States, while allowing the witness to sign electronically, still require their physical presence in front of the notary.*

***How could the eIDAS Regulation or its implementation be improved with regard to trust services?***

- 1) Establish EU common requirements for electronic services that would enhance the interoperability of existing trust services. Providing effectively the same legal effect to electronic signatures to handwritten ones would help increase their diffusion, and broaden the spectrum of solutions available for companies for a global and efficient entity management.*
- 2) Couple the e-signature with an EU identity to avoid the physical presence requirements for the identification of individuals.*