

EU digital ID scheme for online transactions across Europe

Feddback by ARIADNEXT

First of all, we would like to acknowledge the extraordinary work already carried out by the European Commission on the eIDAS Regulation and on the approach and method chosen for its revision.

We agree with the diagnosis made in the "Inception Impact Assessment" on the state of development of eIDs in Europe and the consequences that this situation has on the development of a large common European digital market. The disparities that exist between the different countries and the divergent national strategies (opening up to service providers from the private sector or not, single national identity provider or private identity providers, etc.) risk creating divides that will be difficult to bridge. This is why we do not believe that the status quo defined by the baseline scenario is feasible.

On reading the Inception Impact Assessment, we understand that the options described are not mutually exclusive and that, on the contrary, they would in all likelihood have to be combined in order to achieve a satisfactory result. Thus, it seems difficult to consider option 2 without having implemented option 1, and option 3 seems to require at least a good part of options 1 and 2.

Option 1:

This option seems to us to be the minimum change to be made. It reduces the disparities regarding prior verification of identity, especially at a distance, and is an important step.

Similarly, abandoning the doctrine of technological neutrality, if it leads to the adoption of open and already recognized international standards and specifications, will reduce the technical difficulties encountered today in ensuring the interoperability of solutions.

It might then be possible to allow an Identity Provider evaluated in one Member State and meeting the technical specifications of another Member State to

operate in the latter without having to go through a lengthy and costly evaluation again.

Member States could also be encouraged or forced to open up their identity schemes to private Identity Providers, which should foster innovation and user experience once a business model is defined. The existence of a business model for digital identity seems to us to be an indispensable element: if there is no business model, digital identity will either be financed by taxes, which will not encourage innovation, or at the mercy of players who will derive additional benefit from becoming an identity provider. It therefore seems important to us that Member States should be obliged to provide an economic model for their identity scheme as soon as it is open to private service providers.

As a private identity provider in France, we are confronted not with the absence of an economic model, since the service providers are prepared to pay, but with a lack of market organization in a model where the National Scheme plays the role of aggregator without assuming the consequences.

Option 2:

We consider this option to be highly desirable, as identification is often not sufficient to access a service, for example a banking KYC. But we do not believe it is necessary to go as far as defining new Trust Services. Indeed, if we take the example of a banking KYC, the providers of the necessary attributes are already identified (tax authority, utility bill, etc.) and adding an additional element in the trust chain does not seem to us to facilitate integration.

Option 3:

We believe that the introduction of a "European Digital Identity scheme" would be an extremely important way of strengthening the use and deployment of electronic identity in Europe. A fully harmonised e-identity scheme covering Europe would allow a transition from the current, very different systems to a common standard which would significantly contribute to adoption, both from a purely technical and economic point of view, but also increase adoption in terms of ease of acceptance and use.

We believe that this is even the only desirable horizon as it avoids the fragmentation of solutions which is a real danger for European players who will

not manage to reach a critical size in a market made up of national schemes with special requirements.

Additional comment on digital residency :

eIDAS and GDPR are extraordinary tools that shape a European conception of digital. In this sense they are both protectors and bearers of European values. It seems important to us to be able to project them beyond European borders and to allow non-EU citizens to be issued with a digital identity by a European Identity Provider, to use European online services and to place themselves under the European legal umbrella. Restrictions on residence or nationality that are sometimes present (explicitly or implicitly) in certain national identity schemes should therefore be banned.

We thank you for allowing us to express our position on the changes we believe should be made to the eIDAS Regulation and we are of course at your disposal to discuss it further.