

I. General remarks

Secure digital identities are seen as a key factor for further digitisation in Europe and a stronger convergence of the Digital Single Market and more efficient administration. eco therefore welcomes the efforts to strengthen trust services based on corresponding technologies. Efforts to date have not yet been sufficiently successful and greater dissemination of corresponding services in administration, business and society would be desirable. In general, it can be observed here that the eIDAS legal framework has created the basis for numerous special applications that are mainly used in business transactions (B2B). For simple single sign-on services, however, which are used in less critical areas, the legal framework is currently not yet well developed. However, it is precisely this area (C2B) that is central to the continued success of trust services.

II. About the Inception Impact Assessment in detail

â€”^a On the "Problem, the initiative aims to tackle".

In the Commission's view, the dissemination of trust services can still be expanded. In principle, this assessment is correct, as is the concern about the rather slow implementation of the regulation in the member states. The legal framework for digital identities, which is currently not particularly well developed, also leads, as the Commission rightly recognises, leads to only a hesitant development of the possibilities for digital identities.

Even if a market approach is fundamentally welcome for the development of various solutions for digital identities and associated services such as single sign-on services, the problem of insufficient scaling and fragmentation that often occurs in the market remains. From eco's point of view, the creation of a standardised digital identity based on an open standard with a corresponding data format would be welcome here.

â€”^a On "Objectives and Policy Options

For an ambitious project such as a European digital identity (EUID), the legal framework will have to be adapted and, if necessary, further pre-legislative regulations will have to be created. Based on this realisation, eco does not consider the retention of the existing framework described under the "baseline scenario" to be a particularly suitable approach for achieving the goals.

The eco also believes that the "extended baseline scenario" elaborated under "Option 1" will not be sufficient to ensure sufficient homogenisation in the development of digital identities. The national eIDs developed in the Member States in this framework also bear the risk of fragmentation, which is not sufficient in the light of the objective of a common digital single market.

The proposal listed under "Option 2" to expand the eIDAS Regulation to include a European digital identity based on market design is promising from eco's point of view and could serve as a basis for further digitisation and the promotion of digital identities. However, care must be taken in the design that the planned regulations do not diverge too much in the individual member states or create a fragmentation of the market.

With regard to the ideas suggested under "Option 3", eco welcomes the approach of a uniform digital European ID (EUID) that is compatible with the eIDAS framework and further legislation. eco points out, however, that the provision of services and IDs should ideally take place on the market and not through sovereign acts within the framework of the administration. As far as the obligation to provide corresponding products and services for their use is concerned, eco believes that there is a need for further discussion. An obligation of private providers to use EUID, in the worst case even a single

specific product, is considered by eco to be not very expedient. The wording of the Inception

However, the wording of the Inception Impact Assessment suggests that this is precisely what is intended. eco rejects this proposal. It should also be emphasised that the planned euID should ideally be designed as an open standard / open data format, if necessary with further technical requirements, so that a wide variety of providers are able to providers are able to easily integrate it into their services and link it to other services and products. services and products and, conversely, that EU citizens have the opportunity to citizens have the possibility to register an EUid with a provider of their choice. provider of their choice. eco advises against a state solution. Previous efforts in this direction have been unsuccessful due to their almost exclusive have not been successful in the market due to their almost exclusive focus on administrative services.

On Preliminary Assessment of Expected Impacts

As already outlined, the retention of the existing legal framework is likely to result in only a few significant impulses for the dissemination of digital services. eco therefore advocates an adjustment of the legal framework.

The extent to which the two scenarios listed under Option 2 and Option 3 are suitable in detail to promote the desired goals of greater use of digital services cannot be conclusively assessed at present and depends on the concrete design.

In the opinion of eco, a Europe-wide approach and a uniform ID with a view to forming a digital single market with uniform and equal rules throughout Europe, as described in option 3 with the help of the EUid, is desirable. However, it is crucial that these plans for an EUid and the associated services take into account the character of an open internet that can be used by everyone and that the basic ability to connect and integrate with other services and a high degree of interoperability are guaranteed. Unlike previous national projects, which have relied on proprietary solutions, the EUid should accordingly also be open and able to be integrated by a wide variety of service providers and product developers into their services and applications easily and without additional costs or licence fees. At the same time, such a provision for the private sector should not be linked to an obligation to use it. eco is convinced that with the provision of a uniform ID in combination with market-driven solutions for the provision of services and applications around the ID, the best possible solution for society, the economy and the state can take place.

III. Summary and evaluation

eco supports the revision of the legal framework for trust services. Particularly from the point of view of strengthening digital identities and general services in less critical areas (single sign-on), this is welcome in the opinion of eco and necessary in view of the low penetration. With a view to the digital single market, a uniform solution across Europe would make sense for citizens as well as for governments and the economy. However, when redesigning the legal framework, care should be taken to ensure that any planned EUid or other solution does not make the mistake of similar national considerations in earlier years and focus on specific services or products or strive for proprietary and costly solutions. An open connectable system with a high degree of interoperability that enables the simplest and

most cost-effective integration into various products and services and acceptable requirements for the authorisation for the operation of corresponding ID services are, in the opinion of eco, imperative to make the Commission's plans a success, otherwise they will fail either due to a lack of demand because of too much specialisation or due to a lack of offers in the market. In the eco's view, an obligation to use such a system would then also no longer make sense if it becomes established in the market anyway. This would also allow room for innovation. Minimum requirements for the security of hardware and software used should nevertheless be pursued in the standard to be aimed for within the framework of the security by design approach in order to reduce the risks of misuse and identity theft.