# **Manuscript**

Note:

1) Reading through the initial set of documents without interpreting and making few general notes (What is interesting or significant?)

2) Organising the terms and possible themes to provide more accurate terms/phrases to inform future coding and analysis for a more nuanced understanding of the data and more relevant information (iterative process)

The text numbers refer to the numbers of the documents (ID) found via the html widget of the dictionary created in R Studio.

As some statements contain more than one word combination categorised into a cluster, they can be extracted via more than one cluster.

The paragraphs are structured (per cluster based on the results of the cluster analysis) as follows:

- text number and type of actor and year

- quotation

- first cycle of coding: open coding

- second cycle of coding: axial coding (possible matches with theoretical components)

# **Cluster 1: electronic services**

Text 1: EU document 2014

“The European Parliament, in its resolution of 21 September 2010 on completing the internal market for e-commerce (1), stressed the importance of the security of electronic services, especially of electronic signatures” [76:12 p 2 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/7bbecefe-5c43-4c19-b289-a30a91e5bb37)

* electronic services security as an integral aspect for direct access to services
* DEG radical disintermediation

“Confidence in and convenience of online services are essential for users to fully benefit and consciously rely on electronic services.” [76:13 p 7 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/e8c32bed-f6c9-48f7-87de-d5851a4d0184)

* electronic services convenience as an essential aspect for user’s reliance
* DEG Client-based or needs-based reorganisation

“‘trust service’ means an electronic service normally provided for remuneration” [76:14 p 12 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/08bab1b4-9a7c-4c03-9cfd-3287a10db985)

* financial incentives for providing trust services/electronic services
* NPM performance-related pay

Text 18: private stakeholder 2019

“Amongst the electronic services provided by Trust Services Providers (TSPs) and covered by the eIDAS Regulation, the question of website authentication is expected to become a mechanism extensively used.” [7:3 p 2 in Feedback from Eurosmart (Business association) F487173.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9c021f48-a652-444a-81c5-2682eab2ce37/quotations/c6c02c6f-632c-4aa7-843b-ccad5a49644d)

* the wide use of website authentication aligns with the goal of direct service access; shift towards digital technologies for establishing direct connections between providers and customers, who have direct access to the services
* DEG radical disintermediation

Text 53: private stakeholder 2020

“remote electronic signature service providers should apply specific management and administrative security procedures” [46:6 p 10 in Feedback from European Signature Dialog (Company business) F547552.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/7d30814c-3253-4fa3-a34f-4b6527440b3c/quotations/782faad0-2df9-44f6-b4b6-0b641b174eae)

* electronic service security as a responsibility of service providers to ensure direct access to services
* DEG radical disintermediation

Text 62: private stakeholder 2020

“\* Public administrations should roll out more public services,

making better use of electronic trust

services in their contact with citizens and businesses.

Strongly agree” [154:1 p 2 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/050a76e5-07df-41f3-b078-694880d5a3b4)

* providing more public services and leveraging electronic trust services can enable direct access to services and hence enhance interactions with citizens and businesses alike
* DEG radical disintermediation

Text 70: private stakeholder 2020

“meaningfully involve the private and financial sector in relation to electronic attestation services” [33:1 p 2 in Feedback from SGM CONSULTING - EVROTRUST (Company business) F548844.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b1969509-4af0-4edc-bef6-b90813a8e50c/quotations/a0d47c76-959f-4d55-817f-5e659643ec4a)

* involvement of private sector in electronic services
* NPM capital market involvement in projects

“A new category of eIDAS trust services is to be introduced for the purpose of attesting the identity and/or status of a given person in a given situation or context – the Electronic Identification Service;” [33:2 p 3 in Feedback from SGM CONSULTING - EVROTRUST (Company business) F548844.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b1969509-4af0-4edc-bef6-b90813a8e50c/quotations/f50a1cfd-a51a-4992-a670-541b464fc743)

* Promoting direct service access without intermediaries by offering users a secure identification method
* DEG radical disintermediation

Text 77: EU document 2021

“The European Parliament, in its resolution of 21 September 2010 on completing the internal market for e-commerce (1), stressed the importance of the security of electronic services, especially of electronic signatures” [75:12 p 2 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/7bbecefe-5c43-4c19-b289-a30a91e5bb37)

* the security of electronic services as an integral aspect for direct access to services
* DEG radical disintermediation

“‘trust service’ means an electronic service normally provided against payment” [76:8 p 22 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/873f1de8-9410-45bf-b7a3-51f6be4a9df8)

* financial incentives for providing trust services/electronic services
* NPM performance-related pay

# **Cluster 2: public security**

Text 1: EU document 2014

“The Commission shall make available to the public, through a secure channel, the information referred to in paragraph 3 in electronically signed or sealed form suitable for automated processing.” [75:15 p 25 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/8631c9b5-3742-42b8-aeac-cb5b30523faa)

* the provision of information through a secure electronic channel may be indicative of electronic channels as the primary means of communication
* DEG Electronic service delivery

# **Cluster 3: commission implementation**

Text 35: private stakeholder 2020

“This implementation act should be reviewed to enlarge the data set defining natural and legal person with supplemental optional attributes. As such it would be helpful to support other sectorial usages that require other data.” [73:2 p 2 in Feedback from ACN - Alliance pour la Confiance Numérique (Alliance for Digital Trust) (Business association) F548675.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a3eedf3f-01be-4051-bc8c-1c0e39853ce2/quotations/557173ca-76ef-4d36-b03b-0667d4a7e012)

* the implementation act should be adjusted to include various sectorial usages; this implies the need for standards
* DEG reinstating central processes

The criteria defined in this implementation act are too vague and leave too much space for interpretation. A first attempt to refine them was achieved by the cooperation group through a guidance. However these criteria still remain vague, while this document does not have any legal effect, as it is only indicative.” [73:3 p 3 in Feedback from ACN - Alliance pour la Confiance Numérique (Alliance for Digital Trust) (Business association) F548675.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a3eedf3f-01be-4051-bc8c-1c0e39853ce2/quotations/4683ad69-eb88-4977-9188-83d7cb691bf2)

* The missing legal effect of implementation criteria necessitates more precisely defined criteria for standardisation
* DEG reinstating central processes

Text 55: private stakeholder 2020

“The Commission Implementing Regulation EU 2015/1501 on the interoperability framework should require credential phishing resistance at LoA High;” [43:2 p 3 in Feedback from FIDO Alliance (Company business) F548762.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8acdeab5-da03-4f07-bc41-6ffc0833a8c8/quotations/6485b567-df0f-4db9-b7e7-e84db0b0da04)

* the regulation should include more security standards by providing a common framework
* DEG reinstating central processes

Text 76: private stakeholder 2020

“The Commission Implementing Regulation EU 2015/1501 [6] should require credential phishing resistance at Level of Assurance” [24:2 p 3 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/71676ca5-5e4f-49fc-974a-6057819112ec)

* additional security standards as a priority for the regulation
* DEG reinstating central processes

“The Commission Implementing Decision (EU) 2016/650 [7] does not refer to any standards for signing devices operated by a trust service provider in a secure environment that could meet the requirements in the eIDAS Regulation (EU) 910/2014 Annex II [5]” [24:3 p 7 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/2f253f04-ae97-415c-8e51-28b3e2dba83a)

* signing devices require standards for security through a centralised approach
* DEG reinstating central processes

“The Commission Implementing Regulation EU 2015/1501 [6] on the interoperability framework refers to technical specifications with SAML v2 as the federation protocol used for interaction between the eIDAS-Nodes. The scope could be broadened to include OpenID Connect [11], since that is a modernized version of federation protocols, which is deployed at several private and governmental systems” [24:4 p 9 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/a2ec3e46-0045-48af-9212-f5af3ac52579)

* regulation should address widely used protocols to ensure a more centralised approach and establish standards
* DEG reinstating central processes

# **Cluster 4: national standards**

Text 77: EU document 2021

“In the absence of European regulation, there is a risk that national legislators will set diverging national standards. To prevent fragmentation, it is necessary to define a single pan-European framework that will enable the cross-border recognition of trust services supporting the operation of electronic ledgers.” [76:9 p 12 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/3ba1afb1-86b6-41cb-9009-8fcd4d8ab955)

* fragmentation risk due to national standards —> European framework required for cross-border recognition of trust services
* DEG reinstating central processes

# **Cluster 5: issuance level**

Text 77: EU document 2021

“to optimally achieve the objectives of this initiative, it is necessary to finance a number of actions both at the Commission level, where the allocation of about 60 FTEs is envisaged in the period 2022-2027 and at Member State level through their active participation in the expert groups and committees linked with the work of the initiative and which are composed of the representatives of Member States.” [76:10 p 9 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/2ba7b0e6-fc00-45c0-9cf5-7ac10a1e822e)

* multi-level collaboration due to financial incentives
* DEG Joined-up governance

# **Cluster 6: development support**

Text 77: EU document 2021

“Procurement contracts supporting the development of standards and technical specifications, as well as the cost of maintaining the building blocks of the eID and trust services are estimated at up to 3-4MEURO annually.” [76:11 p 49 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/0c8b9ba7-cbe7-4f0a-8677-bcc39ebd5596)

* developing standards requires specialised knowledge, such as procurement contracts for expertise
* DEG procurement concentration and specialisation

# **Cluster 7: market inclusion**

Text 3: private stakeholder 2019

“The regulation contains the standardised trust services of the European digital single market, which include the qualified electronic signature (QES), the qualified electronic seal (QSiegel) or qualified website certificates (QWACs). With the help of these tools, electronic communication can be secured.” [22:14 p 1 in 2019 English-German Feedback from Bundesdruckerei GmbH (Company business) F487162 (private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/7167983f-a5db-4751-91f9-54750d66eb82/quotations/a2e32737-fa3e-42c1-93aa-a3e76c753d2d)

* standardisation in single market for secure communication
* DEG reinstating central processes

Text 43: other stakeholder 2020

“care must be taken since there is an inherent risk to create a non harmonized market by inclusion of such «local» attributes” [57:1 p 3 in Feedback from Association for promotion of digital verification (Other) F545872.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/5e3caf41-9691-4ca8-9f96-77ef54cc9d10/quotations/989fb867-06b3-42b5-b36d-426cbea93047)

* the trade-off between including local attributes and market harmonisation highlights the relevance of standardisation for a more harmonised market environment
* DEG reinstating central processes

Text 51: private stakeholder 2020

“there is an inherent risk to create a non-harmonized market by inclusion of such local attributes.” [47:1 p 1 in Feedback from Erste Group Bank AG (Company business) F548968.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/5c48f155-346f-49df-a6b8-7e34325429ef/quotations/a41113ab-90c0-4c0f-8057-b22418fcaba6)

* The trade-off between incorporating local attributes and market harmonisation highlights the importance of standardisation for a more harmonised market environment
* DEG reinstating central processes

Text 66: private stakeholder 2020

“shortcomings in the current eIDAS framework that need to be addressed. These shortcomings feed into wider problems that we are experiencing in the European digital identity verification market. These include: - eIDAS supports a limited amount of trust services and use-cases - eIDAS does not establish certifiable standards for all digital identity providers - There is a lack of adoption and harmonisation across Member States and verticals - Due to lack of adoption, barriers to entry have emerged in specific verticals and Member States” [32:8 p 1 in Feedback from Onfido Ltd. (Company business) F548633.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/47795f41-9420-48b9-801f-2dd8b91d328c/quotations/0467bd7e-3dc1-4588-9db7-05c937d546be)

* eIDAS framework has shortcomings that hinder the wide adoption of digital identity verification within Europe; one of the reasons is the lack of certifiable standards
* DEG Reinstating central processes

# **Cluster 8: system creation**

Text 32: other stakeholder 2020

“An overall system must be created in which EU citizens are given real power of disposal over their data.” [64:1 p 1 in 2020 English-German Feedback from GISAD i.G. F548915 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/13e556f1-6917-4369-8b8e-e4ed512ddb29/quotations/95e0d721-1682-4fc6-9af9-998d32b81124)

* to grant citizens the control over their own data, an integrated and cohesive system is required
* DEG Joined-up governance

Text 45: private stakeholder 2020

“The eIDAS Regulation provides for mutual recognition of notified identification instruments existing in the Member States and thus already provides for a common European eID ecosystem by creating interoperability between national systems (see Policy Option 3).” [54:1 p 2 in Feedback from Bundesdruckerei GmbH (Company business) F546495.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/2fdacd99-3481-42ec-afc2-e4a0c681d360/quotations/a7c82455-9a39-43ed-9ee2-1f153eda8f1a)

* Interoperability as the foundation for a unified, well-integrated eID system to ensure compatibility among national systems
* DEG Joined-up governance

Text 54: private stakeholder 2020

“National eID schemes are mostly notified at level “High” under eIDAS. On the other hand, private service providers prefer relying on eID schemes with LoA “Substantial” as it provides a good trade- off between (1) the cost incurred to technically support an eID scheme, and (2) the risks of fraud resulting from the usage of an eID. Therefore, a large ecosystem of eID scheme of LoA “Substantial” is needed to meet today’s needs of private service providers” [45:11 p 7 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/c224e098-2a8d-4399-9ac3-9904dd2d882f)

* interests of private providers, among other actors, are relevant for the functioning of the eID scheme; this requires the integration of information across different levels
* DEG Joined-up governance

# **Cluster 9: solution framework**

Text 3: private stakeholder 2019

“The public sector will become more efficient through cloud services and will be able to better manage digital processes in the future. However, such services and applications require the necessary legal certainty for the users and manufacturers of these solutions. So far, a framework for the regulatory enabling of these services is missing.” [22:15 p 39 in 2019 English-German Feedback from Bundesdruckerei GmbH (Company business) F487162 (private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/7167983f-a5db-4751-91f9-54750d66eb82/quotations/03a5c6b6-5d45-4603-8c8f-9de2722325cc)

* regulatory framework for services required
* DEG Reinstating central processes

Text 54: private stakeholder 2020

“it may be worth considering a dedicated role for identity proofing, sorted out from the one of eID provider. This would be justified given the utmost importance and criticality of identity proofing for trust in private eID solutions under the new framework.” [45:12 p 10 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/5c0d65d3-2393-4e79-83fe-fe7578368488)

* the existence of a framework is indicative of certain standards for identity proofing
* DEG Reinstating central processes

Text 66: private stakeholder 2020

“The patchwork of regulations that exists across Member States causes a high level of uncertainty for businesses and effectively blocks consumers in some Member States from using safe and user-friendly digital identity verification solutions in others. The eIDAS framework should address the regulatory fragmentation” [32:4 p 1 in Feedback from Onfido Ltd. (Company business) F548633.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/47795f41-9420-48b9-801f-2dd8b91d328c/quotations/25f3cc35-d1fa-4cc7-b078-6036d152e097)

* lack of harmonisation can cause regulatory fragmentation —> possible solution: improvement of eIDAS framework
* DEG Reinstating central processes

# **Cluster 10: electronic identification systems**

Text 6: other stakeholder 2019

“The security levels specified by the eIDAS Regulation for electronic means of identification (eID) are only suitable to a limited extent for use in the sovereign area of the member states. In particular, according to the current legal situation, the unauthorised transfer of an eID (in Germany, e.g. Union citizen card and PIN) cannot be detected. This often stands in the way of integrating eID in the sovereign sphere, since acting under a false identity cannot be ruled out with certainty.” [19:1 p 1 in 2019 English-German Feedback from\_ Bundesnotarkammer F487262 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/83985e28-cc5a-437a-b0ec-fe2935ea227e/quotations/3b338d26-bf03-4152-9c45-3bfe31390b15)

* challenges of verifying eID fragmentation
* DEG Joined-up governance

Text 11: other stakeholder 2019

“eIDAS has achieved market development by increasing confidence in electronic transactions and improving interoperability between Member States. between Member States.” [14:1 p 1 in 2019 English-Spanish Feedback from\_ Anonymous F487184 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/f47c8165-d587-432a-b54f-d6c2b3f98ef2/quotations/023d71cb-2ca2-4183-817b-b969e71b54a2)

* eIDAS benefit: interoperability between states
* DEG Joined-up governance

Text 18: private stakeholder 2019

“the recently created CEN/CENELEC TC on Blockchain and DLT will soon set about working on a Technical Specification on eIDAS/eID compliance, to enable compliance with eIDAS regulation eID requirements” [7:4 p 4 in Feedback from Eurosmart (Business association) F487173.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9c021f48-a652-444a-81c5-2682eab2ce37/quotations/ccad7293-9d0b-48b8-81b7-acb123ae04d1)

* relevance of eIDAS regulatory compliance
* DEG Reinstating central processes

Text 34: private stakeholder 2020

“To ensure wide reach, existing SSO standards which are already in conformity with eIDAS should be included. The eIDAS regulation should define and complement standards to ensure interoperability in consideration of different levels of security.” [68:16 p 2 in Feedback from 1&1 (Company business) F548611.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/d90eab48-0b39-4d32-8267-d35fc7077a09/quotations/45dae449-dd89-4e92-abd4-e4113e46bbdb)

* eIDAS interoperability standards for different levels of security
* DEG Joined-up governance

Text 41: other stakeholder 2020

“Any Commission intervention should be based on technological neutrality with a special attention to the eID models already in place and the interoperability node system currently used. Only in this way can the maximum efficiency with the widest dissemination be achieved. In this sense, a link with the Strong Customer Authentication (SCA) provided by the PSD2 might play an important role in the promotion of the application of eID under eIDAS also by the private sector.” [62:1 p 1 in Feedback from Anonymous F548950.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a64eacb2-d1d3-4a17-b355-3a327550e042/quotations/89a1e9fc-ff69-4ee8-9dc6-22edfe7d92b8)

* Involving the private sector in the adoption of the eIDAS
* NPM Capital market involvement in projects

Text 45: private stakeholder 2020

“The additional introduction of a European eID (with its extremely high legal and technical complexity) would probably slow down the ongoing process of the eIDAS Regulation and would not address the lack of use cases. Bundesdruckerei therefore recommends that the concrete design of the national eID systems should continue to be left exclusively to the Member States which must assume liability for the authenticity of an identity and validate the national eID.” [54:2 p 2 in Feedback from Bundesdruckerei GmbH (Company business) F546495.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/2fdacd99-3481-42ec-afc2-e4a0c681d360/quotations/5bd1fe1b-6456-4767-a828-2a3ee1ad2d75)

* The prioritisation of national eIDs over European eIDs reflects the importance of national sovereignty
* DEG Re-governmentalisation

Text 46: other stakeholder 2020

“any resident of a member state should have the right to quickly obtain an eID and this eID should be compatible across the EU.” [51:7 p 3 in Feedback from Center for Data Innovation (NGO) F547234.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/77410f3b-0178-497b-ae90-946afe583863/quotations/8e5969f5-d86b-416c-9d8b-dc3a15306d30)

* Right of citizens to use the interoperable eID across the EU
* DEG Radical disintermediation

Text 54: private stakeholder 2020

“Eurosmart supports option 1 as a necessary step to consolidate the eIDAS framework. Further enhancements and extended usages of eIDs under eIDAS should be fostered. In particular, deeper harmonisation of certifications will bring more confidence and trust to stakeholders.” [45:13 p 1 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/f5ec3d5a-955a-4aa4-bac6-db5807a14633)

* Expanding the usage of eID for increased harmonisation as a requirement to strengthen the eIDAS framework
* DEG Reinstating central processes

“The use of eIDAS solutions by private actors could be an incentive to boost the European Digital Single Market.” [45:14 p 1 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/f9caa36f-1237-4e5b-a95a-8c598b083101)

* Private provision of eIDAS solutions for the benefit of the digital single market
* NPM Capital market involvement in projects

“Option 1 (improvement of the coherence, consistency and interoperability of the eIDAS framework) remains a priority. It is Eurosmart’ s preferred option. Member States and the private sector have already made investments and efforts to scale up the eIDAS framework.” [45:15 p 4 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/4a22145e-99b7-4422-bc1f-236bd4f4a51b)

* efforts from public and private actors alike to work on the eIDAS framework
* NPM Public-private partnerships

“It is paramount to improve and speed up the mutual recognition process of notified eID schemes.” [45:16 p 4 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/a892ddf2-37f8-4c92-a42d-58c00a06b62d)

* mutual recognition of eID notification scheme is important
* DEG Joined-up governance

“The eIDAS eID framework has demonstrated that a decentralised and technologically neutral framework remains the most robust solution to ensure interoperability and mutual recognition of eID schemes across Europe.” [45:17 p 4 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/0d340ec2-8005-46e7-83a4-7f0076403d8f)

* decentralised eIDAS framework for interoperability; not too much centralisation (or central control)
* NPM Light touch regulation

“the level of assurance of the natural eID bound must be at the same or upper level of assurance of the device or legal eID issued” [45:18 p 4 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/c98c0820-7a0e-44e8-83fe-ac3712b76df4)

* guideline recommendation for eID level of assurance
* DEG Reinstating central processes

“The three eIDAS levels of assurance (LoA) for eID must be the reference for the private sector. Otherwise, this would hamper a large use of digital identities within the EU, as notified eIDs under eIDAS would not be comparable to future private initiatives.” [45:19 p 6 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/a71d590c-7dd9-4f6d-afff-1deb610f4994)

* standard eIDAS level of assurance as a guideline for the private sector
* DEG Reinstating central processes

“the recognised private eID solutions should be built on a legal identity delivered by a Member State or a notified eID under the eIDAS Regulation at level “substantial” at least.” [45:20 p 9 in Feedback from Eurosmart (Business assciation) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/4613c900-ff0c-4627-a675-9a66da71d3ef)

* role division between public and private sector in eID solutions
* NPM Outsourcing

“In order to be accepted and trusted, private eIDs should ensure a strong binding between the claimed identity and the holder. It is of the utmost importance as a transaction involving an eID is usually made online without any physical interaction. A strong binding between the claimed identity and the holder requires a strong identity proofing prior to the issuance of the eID by the eID provider.” [45:21 p 9 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/3b0a33e6-464c-4054-8e1d-8eb08f752291)

* Direct online identification necessitates the use of private eID identity proofing
* DEG Radical disintermediation

“Strong binding of attributes with a notified eID under eIDAS More globally, citizens using their self-sovereign identity will collect all along their digital journey, attributes, credentials, or any certified assertions from various private attribute providers. These private attributes are related to user’s day to day activities with academic, corporate, associations, etc... Private stakeholders should have the capability to present their own attributes – e.g. university degree, professional qualification or experience, corporate attestation of work, status, proof of residence, financial solvency, etc. - and to have them bound with eIDAS identification.” [45:22 p 12 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/bec130e3-c3f9-4d4f-800f-3dddf05d8096)

* private providers should be able to choose the attribute
* NPM Light touch regulation

Text 57: other stakeholder 2020

“Given the Commission considers a more ambitious legislative intervention to the eIDAS Regulation, GLEIF suggests that a more prescriptive direction from the Commission is necessary for untapping the benefits for the end-user and the whole ecosystem.” [39:1 p 1 in Feedback from Global Legal Entity Identifier Foundation (GLEIF) (NGO) F547545.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/1fde91e4-4442-407d-99a8-4102337868aa/quotations/a92b65d7-ca81-4bfe-a962-88555702a2b9)

* eIDAS regulation is described as taking a prescriptive role to the benefit of the users and the ecosystem
* DEG Reinstating central processes

Text 61: private stakeholder 2020

“It is furthermore important that the schemes to obtain a registration as trusted service provider are equal throughout the EU to prevent unfair competition. For example currently compliance of eID’s with the eIDAS requirements differs between member states, which might cause unfair competition.” [38:1 p 1 in Feedback from KNB (Business association) F548866.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/df9869f5-2e36-4d8d-8aab-50be5dbd5bea/quotations/b9fa5ac4-f27b-41e8-99c4-47d17686b828)

* despite different eIDAS requirements across the EU, there should be fair competition among the trust service providers
* NPM Product market liberalisation

Text 62: private stakeholder 2020

“What type(s) of eID do you use?

eIDs provided by my government or other public authority” [154:2 p 1 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/bad1dce1-81c7-4d27-a4c8-06317caae85e)

* government provision of the eID
* DEG Re-governmentalisation

Text 69: other stakeholder 2020

“Any Commission intervention should be based on technological neutrality with a special attention to the eID models already in place and the interoperability node system currently used. Only in this way can the maximum efficiency with the widest dissemination be achieved. In this sense, a link with the Strong Customer Authentication (SCA) provided by the PSD2 might play an important role in the promotion of the application of eID under eIDAS also by the private sector.” [30:1 p 1 in Feedback from Poste Italiane (Other) F548999.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/40549a79-1d1c-4f0d-b27f-1bb62cdb5ed4/quotations/e632db51-3dad-41bc-b008-c8aa9bb417de)

* Involving the private sector in the adoption of the eIDAS
* NPM Capital market involvement in projects

Text 73: private stakeholder 2020

“Option1: In this respect, harmonization as mentioned in option1 appears as a necessary step to establish solid foundations across the EU, on top of which further enhancements and extended usages of eIDs under eIDAS can be fostered. In particular, deeper harmonization of certifications will bring more confidence and trust to stakeholders, and will finish clarifying the eIDAS security requirements and Levels of Assurance – LoAs -. The recent adoption of the Cybersecurity Act and the coming EU CC scheme arrive at the right time to smoothly achieve such harmonization.” [26:2 p 1 in Feedback from Thales DIS (Company business) F548993.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/67cdbb2a-9855-4e70-b0e1-2fa52b46eb04/quotations/15a45405-1b88-4333-bd2e-1ceeca1ac466)

* Promoting harmonisation through the usage of eIDs under the eIDAS framework
* DEG Reinstating central processes

“To boost such adoption and further structure private eID frameworks, a dedicated regulation should give a mandate to European Standardization Organisations (ESOs) to define the necessary harmonized standards for the reuse of notified eID schemes by the private sector. This harmonized standard should address private eIDs and attribute providers as well as private services accepting them (also called relying parties). It should consider data privacy, identity and attribute proofing, and strong binding of private attributes with a notified eID under eIDAS” [26:3 p 1 in Feedback from Thales DIS (Company business) F548993.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/67cdbb2a-9855-4e70-b0e1-2fa52b46eb04/quotations/90b4fba2-90aa-48e0-adf4-ad78e289f927)

* private providers should be able to choose the attribute
* NPM Light touch regulation

“If such private companies were to create eIDAS-compliant eID schemes, the identification and authentication requirements should preferably meet the LoA according to High in order for the eID schemes to be fully notified on the EU level. If needed, separate tenants with specific identification and authentication solutions may be deployed to increase the security level as required to meet LoA High. The private companies may take the legal responsibilities and liabilities for the eID schemes, equivalent to the supervising agencies” [24:5 p 8 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/b75a5b91-ae58-4cd6-80e8-65b1abe0a7e0)

* For the eID schemes, there are some criteria and standards that private providers have to fulfil; their responsibility is compared to that of supervising agencies, so there might be a clear distinction between private providers and other entities, such as public entities, involved in this process
* NPM Purchaser-provider separation

Text 77: EU document 2021

“When notified electronic identification means and the European Digital Identity Wallets are used for authentication, Member States shall ensure unique identification.” [76:12 p 28 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/68d4f16b-6a8c-4d8c-bd55-5a6f7c99eb4c)

* it is the task of the national government to ensure identification
* DEG Re-governmentalisation

# **Cluster 11: digital identity**

Text 18: private stakeholder 2019

“facial and voice recognition are gaining importance for enabling Digital Identities.” [7:6 p 1 in Feedback from Eurosmart (Business association) F487173.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9c021f48-a652-444a-81c5-2682eab2ce37/quotations/4c85d111-c330-414b-8324-3448929eae9a)

* digital identity verification also comprises methods of facial or voice recognition; this could suit different needs and facilitate self-verification without intermediaries
* DEG Radical disintermediation

Text 25: other stakeholder 2020

“digital identity does not consist of a civil status identity but of a multitude of digital identifiers, including an identity linked to the e- reputation integrating all the personal or professional elements present on the web where the level of trust remains to be proven.” [72:1 p 1 in 2020 English-French Feedback from Anonymous F549055 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e137bcaf-6113-49f3-92bc-cd63864466be/quotations/043434ce-e495-4483-8b72-fce1d7dca55e)

* the plurality of digital identities/identifiers implies that there are various purposes for which identities can serve depending on the needs of the user
* DEG Client-based or needs-based reorganisation

Text 26: other stakeholder 2020

“As digital identity is multiple and contextual, it is important to allow individuals to have several digital identities. Thus, an individual should be able to use different digital identities in different contexts” [71:8 p 1 in 2020 English-French Feedback from CNIL (French Data Protection Authority) (Public authority) F549054 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/464383a8-4945-4d98-b449-1d3f555b62ad/quotations/252c9bc3-734c-4088-ac67-5ce29a6fdcee)

* various purposes for various digital identities depending on the needs of the user and the context
* DEG Client-based or needs-based reorganisation

Text 27: other stakeholder 2020

“it strongly values multiple digital identity solutions in line with the French model (FranceConnect), which leaves the choice to the citizen to use the identity they wish (public or private) depending on the procedure they wish to carry out.” [70:3 p 1 in 2020 English-French Feedback from Conseil national du numérique (Public authority) F547048 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e690c263-03e6-4b7f-9996-8a6cbaecdffb/quotations/ffec1c50-1b2c-49ed-ba7c-3df6bdc6ed49)

* various purposes for various digital identities, including the national model, depending on the procedure the user carries out
* DEG Client-based or needs-based reorganisation

“individuals had difficulties in trusting digital identity: some of them would tend to favour the historical identity actors (States)” [70:4 p 2 in 2020 English-French Feedback from Conseil national du numérique (Public authority) F547048 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e690c263-03e6-4b7f-9996-8a6cbaecdffb/quotations/b06dce28-02fa-4f16-bdf7-6c337a63a5e6)

* survey: some people prefer digital identity provision by the government
* DEG regovernmentalisation

“individuals had difficulties in trusting digital identity: some of them would tend to favour the historical identity actors (States) while others would favour private actors” [70:8 p 2 in 2020 English-French Feedback from Conseil national du numérique (Public authority) F547048 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e690c263-03e6-4b7f-9996-8a6cbaecdffb/quotations/0358c10b-c6c2-40e5-9605-5b9fc11a9c5c)

* survey: some people prefer digital identity provision by the private sector; outsourcing of public services to private provider
* NPM Quasi-markets

“it is necessary to provide training for all age groups before and in parallel with the development of digital identities.” [70:6 p 2 in 2020 English-French Feedback from Conseil national du numérique (Public authority) F547048 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e690c263-03e6-4b7f-9996-8a6cbaecdffb/quotations/91d463a2-91b5-46af-a14d-437e6df566c0)

* user training for digital identity required to align the use of the digital identity with its development
* DEG: Facilitating isocratic administration and co-production

“it is important to let citizens choose the digital identity solutions they want to use, if they want to use one.” [70:7 p 2 in 2020 English-French Feedback from Conseil national du numérique (Public authority) F547048 (public).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e690c263-03e6-4b7f-9996-8a6cbaecdffb/quotations/eecfb710-2628-408f-8b20-1104c63e66f3)

* citizens decide whether or not they use a digital identity solution, and if so, which one. Their choice could be based on their needs
* DEG Client-based or needs-based reorganisation

Text 28: other stakeholder 2020

“Furthermore, for reasons of administrative coherence and the proper functioning of the Member States, it seems to us essential to leave the function of issuing authorities the function of issuing identity documents, whether they are digital or on physical media.” [74:3 p 1 in 2020 English-French Feedback from Conseil supérieur du notariat F548663 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a2cb5881-0208-4299-936c-05a22a30eb09/quotations/cbf4b517-728d-4911-8e61-9802a924049d)

* regardless of the medium, governments should be the sole issuer of identity documents
* DEG Re-governmentalisation

Text 29: other stakeholder 2020

“eIDAS identities are strong enough to avoid the need to create sectoral identities such as a financial identity. If the purpose of a financial identity is to reinforce sectoral controls, adding attributes to current eIDAS identities is sufficient to achieve the required level of trust.” [69:1 p 1 in 2020 English-French Feedback from Jean-Jacques Vaultier (EU citizen) F543935 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/d957adaa-de95-4a83-8dcf-d963d11f7146/quotations/f37b8d52-f7c1-4046-bfaa-18c2ed4db1fb)

* having one digital identity for universal use that can be personalised by adding additional attributes for different purposes if needed
* DEG Interactive and ‘‘ask once’’ information-seeking

Text 30: private stakeholder 2020

“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.” [67:1 p 1 in 2020 English-German Feedback from BvDP (Company business) F547352 (private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/c5f2aff8-4d27-4b3b-9d36-34cefd866cb7/quotations/12703cd7-0891-4ffd-821c-da1a1d5092e3)

* A European-wide regulation as a requirement for the adoption of appropriate security measures
* DEG Reinstating central processes

Text 31: private stakeholder 2020

“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.” [66:1 p 2 in 2020 English-German Feedback from eco - Verband der Internetwirtschaft e.V. (Business association) F547025 (private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/864e79da-3d1a-4ebc-8577-cf9a3dca6426/quotations/a17fed10-7259-469e-87c4-0fd0cc45b915)

* The widespread adoption of digital identities with single sign-on verification requires a legal framework
* DEG Interactive and ‘‘ask once’’ information-seeking

Text 32: other stakeholder 2020

“GISAD rejects a pure software solution for digital identification. Many attempts to install such solutions in the past in have failed because they are too inconvenient for the citizen.” [64:2 p 1 in 2020 English-German Feedback from GISAD i.G. F548915 (other).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/13e556f1-6917-4369-8b8e-e4ed512ddb29/quotations/f3c4d786-63a2-48a7-b1ea-9ffa656d3cdb)

* digital identification solutions should be convenient to use for citizens; this may be reflective of a user-centric approach that takes the users’ needs and preferences into account
* DEG Client-based or needs-based reorganisation

Text 34: private stakeholder 2020

“The eIDAS Regulation should set the course and ensure that citizens can participate in the European digital market with a European digital identity rather than having to use non-European IDs” [68:17 p 2 in Feedback from 1&1 (Company business) F548611.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/d90eab48-0b39-4d32-8267-d35fc7077a09/quotations/c2238235-f89a-473a-93db-946beaa5e3e4)

* The widespread recognition of a European digital identity requires legislation
* DEG Interactive and ‘‘ask once’’ information-seeking

Text 35: private stakeholder 2020

“The extension of the scope of the regulation to private actors shall also put in place legal incentives encouraging private sector to issue and effectively use digital identity compliant with the eIDAS framework.” [73:5 p 1 in Feedback from ACN - Alliance pour la Confiance Numérique (Alliance for Digital Trust) (Business association) F548675.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a3eedf3f-01be-4051-bc8c-1c0e39853ce2/quotations/d8407d47-a459-432c-b104-40dc5588a0a9)

* interests of private providers are relevant for the functioning of the eID scheme
* DEG Joined-up governance

Text 36: other stakeholder 2020

“The Digital Identity should be considering as a critical infrastructure and the notification process at European level shall remain a prerogative of the Member States.” [65:1 p 1 in Feedback from AIG CEV (NGO) F547568.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/e62c18bd-322f-4221-8867-10c111d9d398/quotations/0d07fb2a-8644-4c76-b996-8fe61f4313c3)

* the national government has the authority over the notification concerning the digital identity
* DEG Re-governmentalisation

Text 41: other stakeholder 2020

"The introduction of digital identity trusted services, other than the eIDs already implemented under the eIDAS Regulation, should not be pursued. As previously noted, if this were to happen it could undermine the massive efforts, organizational and economic, put in place by the Member States that have already developed notified digital identity systems. As already mentioned, the employment of already existing eID schemes would enable significant synergies to be easily exploited” [62:3 p 1 in Feedback from Anonymous F548950.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a64eacb2-d1d3-4a17-b355-3a327550e042/quotations/4936a713-5c7e-46e3-9770-5bfdd4b119eb)

* the national government has the authority over the notification concerning the digital identity systems; existing eID schemes enable good synergies
* DEG Re-governmentalisation

Text 42: private stakeholder 2020

“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” [56:3 p 2 in Feedback from ARIADNEXT (Company business) F549060.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/d20df3ae-4a8f-47a5-b76d-bc029234e256/quotations/ee7c19ae-020e-4ca5-a174-76391e2fb6a2)

* use of eID under the eIDAS framework can contribute to EU-wide harmonisation through a common standard
* DEG Reinstating central processes

Text 44: private stakeholder 2020

“The future of the digital identity market is one of a “virtuous circle” where both the public and private sector each contribute elements that they are ideally suited to provide – and each make the other stronger.” [55:3 p 4 in Feedback from Better Identity Coalition (Company business) F548763.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/7f96c5c9-0317-4468-8ea8-aafc84b54ee2/quotations/03e3fd91-d661-4a0d-9f38-6d26837cb76c)

* benefit of public-private collaboration under the eIDAS framework
* NPM: Public-private partnerships

Text 46: other stakeholder 2020

“But the Commission should not seek to impose a public sector eID requirement that would limit EU citizens from using private sector digital identity solutions as this would reduce consumer choice and access to many secure, convenient, and easy-to-use services.” [51:8 p 4 in Feedback from Center for Data Innovation (NGO) F547234.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/77410f3b-0178-497b-ae90-946afe583863/quotations/ceba6dad-72e6-4776-a459-116ff1aa77f5)

* No inconvenient private digital solutions through the mandatory use of public sector eID
* DEG Client-based or needs-based reorganisation

Text 47: other stakeholder 2020

“A key concept in The Digital City is an easy to use, safe and reliable Digital Identity. Especially in this challenging episode due to restriction of public services on physical locations to our citizens, we need to provide people with an easy way to authenticate themselves in the digital realm.” [50:2 p 1 in Feedback from City of Amsterdam (Public authority) F547522.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a7e2415e-22ad-4bac-8c8f-ecc44f9c089f/quotations/ec126a43-5fe5-48db-b400-018057a143d9)

* authentication with digital identity to use public services online
* DEG Electronic service delivery

Text 50: private stakeholder 2020

“These private sector trusted digital identity ecosystems have become widely used and provide very sophisticated protection for digital economy participants. They continue to evolve and improve driven by market competition.” [48:3 p 2 in Feedback from Developers Alliance (Business association) F547377.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/0a2f07b7-dd37-4b80-90ef-32da318eff9a/quotations/4682466f-f20e-4175-a0f4-97e98b68f89d)

* market competition of digital identity solutions by various private providers stimulate innovation
* NPM Quasi-markets

“the private sector is fully capable of developing sophisticated digital identity services, benefiting from the continuous innovation that a competitive marketplace promotes. We do not believe that a single, public sector replacement is either required, or desirable. Where a common or compatible system with universal application is beneficial, we are confident that the market will coalesce on this solution” [48:2 p 2 in Feedback from Developers Alliance (Business association) F547377.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/0a2f07b7-dd37-4b80-90ef-32da318eff9a/quotations/d62c05a1-2284-4b6f-9171-adc856f23335)

* market competition of digital identity solutions by various private providers stimulate innovation; whichever solution proves to be most beneficial will emerge as the leading solution
* NPM Quasi-markets

Text 52: private stakeholder 2020

“European digital identity that allows for a simple, trusted, secure and accessible to all public system for citizens and businesses to identify themselves and share identity related information in the digital space can be designed efficiently only at EU level.” [52:5 p 2 in Feedback from European Payment Institutions Federation (EPIF) (Company business) F549030.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/16df2543-b293-4c4e-b63d-922c6d1a66a5/quotations/72a0e3b1-d201-48d2-a4b7-d19edff5d5eb)

* EU-wide design of digital identity implies central standards
* DEG Reinstating central processes

“Despite the eIDAS framework, the national rules on provision of digital identity services remain fragmented in or undeveloped across the EU. It is important that the EU sets the right regulatory framework to make sure that the Single Market is fit for the digital age and fosters the development of digital players.” [52:6 p 2 in Feedback from European Payment Institutions Federation (EPIF) (Company business) F549030.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/16df2543-b293-4c4e-b63d-922c6d1a66a5/quotations/5dd27b74-f069-43f3-8280-5f28d3970949)

* Necessity for heightened regulation due to the risk of fragmentation resulting from national standards
* DEG reinstating central processes

Text 54: private stakeholder 2020

“the right legislative act to meet these objectives is a regulation in order to ensure the needed level of harmonisation. Using a directive would be detrimental to the objective of a global digital identity usable within EU across public and private sectors as it would open the door to numerous fragmentations.” [45:24 p 6 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/a34768f3-c4f5-4a1a-9a24-548def187d19)

* EU-wide regulation can help overcome the risk of fragmentation due to the diversity of national standards
* DEG reinstating central processes

Text 57: other stakeholder 2020

“Moreover, from an end user perspective, ‘once-only-principle’ should be essential. Given, there is a strong support in the EU for making the LEI a necessary component for the creation of digital financial identities, a clear mandate for the LEI can significantly reduce the complexity and cost – both people and technology-related – associated with due diligence and validation of customers, partners and suppliers.” [39:5 p 3 in Feedback from Global Legal Entity Identifier Foundation (GLEIF) (NGO) F547545.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/1fde91e4-4442-407d-99a8-4102337868aa/quotations/11f3ab27-cac5-4777-962e-bf28e68af4ff)

* user convenience as an essential aspect of digital identity that is supposed to make the user experience simple
* DEG End-to-end service reengineering

Text 59: private stakeholder 2020

“The insurance industry generally welcomes the introduction and voluntary use of a European digital identity system (EUid), as a supplementary eID solution, especially for cross-border processes. However, there is a need for further clarity over the exact regulatory and technological implementation of such a system. It would therefore be important to involve industry from the start in the development of any EUid scheme.” [40:1 p 1 in Feedback from Insurance Europe (Business association) F548927.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/80ee3536-5153-438b-b5ca-5a3aaf3a72ee/quotations/9cfdac7e-8eb7-49ae-a92d-7d72f23bb195)

* public-private collaboration as a necessity to clarify the implementation of the EUid
* NPM Public-private partnerships

Text 61: private stakeholder 2020

“Regarding your intentions to launch an European Digital Identity scheme (EUid) we would like to emphasize that it is important that besides public eID’s also private suppliers are allowed to offer eID services to public and private online service providers.” [38:2 p 1 in Feedback from KNB (Business association) F548866.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/df9869f5-2e36-4d8d-8aab-50be5dbd5bea/quotations/ab00132c-25c5-4236-9a36-65fd37088977)

* private supply of eID services besides the supply of public eIDs
* NPM Quasi-markets

Text 62: private stakeholder 2020

“Which of the following corrective actions should be taken?

Introduction of new private sector digital identity trust services for identification, authentication and provision of attributes” [154:4 p 4 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/2df53f99-706f-4f96-a8cb-278e9dc5e771)

* private supply of eID services
* NPM Quasi-markets

“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

Cost savings thanks to economies of scale” [154:5 p 4 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/16f34681-c6c5-4a4c-ba3e-d802dc19bc69)

* benefits of uniform EU-wide digital identity scheme
* DEG reinstating central processes

“Which possible dis-advantages of such single and uniform European

digital identity scheme are you concerned of?

Complexity of set-up and Governance

Set up and operational costs” [154:6 p 4 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/7842aa01-316f-4ff9-b6f0-f9c423915dcc)

* challenges of implementing a universal digital identity: governance and costs; possibly a matter of whether the benefits outweigh the costs
* NPM: Mandatory efficiency dividends

Text 63: other stakeholder 2020

“dangers, such as the direct competition with the private sector that the introduction of the European Digital Identity scheme (EUid) would create, a situation that is unlikely to yield better solutions and services for the citizens and more generically the users. By the way, it makes sense to postpone Option 3 after the proper implementation of Option 1 and 2.” [36:3 p 4 in Feedback from Marco SCOGNAMIGLIO (EU citizen) F548781.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a0a66136-f6fc-4f2c-bf79-93fe50d7cfc8/quotations/e82e10e6-a9a5-4121-a981-c3c3703f9f83)

* Competition between private and public providers as a possible consequence of the EUid can increase the range of provider options
* NPM Quasi-markets

“enhancing digital identity usage in an interoperable and cross-border way.” [36:4 p 5 in Feedback from Marco SCOGNAMIGLIO (EU citizen) F548781.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a0a66136-f6fc-4f2c-bf79-93fe50d7cfc8/quotations/a6699a3b-f564-4b37-a637-1351b0f465d1)

* interoperable and cross-border usage of digital identity
* DEG reinstating central processes

Text 66: private stakeholder 2020

“eIDAS does not establish certifiable standards for all digital identity providers

The lack of standards for digital identity providers means that providers are able to use unsafe solutions in some Member States, while safe solutions are not accepted in others. We believe it is essential that any European legislation on digital identity should set standards for digital identity verification providers to ensure everyone operates above a minimum bar” [32:6 p 1 in Feedback from Onfido Ltd. (Company business) F548633.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/47795f41-9420-48b9-801f-2dd8b91d328c/quotations/dcb76b25-c751-4e63-b917-feef97420f82)

* Necessity for EU-wide standards for providers of digital identification
* DEG reinstating central processes

“With most businesses unable to certify under eIDAS, innovative digital identity verification solutions are prohibited from entering some markets. Restrictive and technology-specific regulations in some countries (especially in the financial services vertical) are harming competition by prohibiting new, innovative solutions from entering markets. It is therefore necessary to put in place a framework that is proportionate to” [32:7 p 2 in Feedback from Onfido Ltd. (Company business) F548633.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/47795f41-9420-48b9-801f-2dd8b91d328c/quotations/a471e76d-b5a4-44b4-a2f4-696297194f05)

* regulation should introduce fewer market barriers for the sake of innovation promotion
* NPM Light touch regulation

Text 67: other stakeholder 2020

“to leverage the respective digital identities for the EU Single Market, we recommend the commission to endorse OpenID Connect beside SAML (which was already endorsed under Implementing Act 2015/1501) as a technical standard for eIDAS” [31:4 p 1 in Feedback from OpenID Foundation (eKYC & Identity Assurance WG) (NGO) F548976.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/ee61aebb-d489-4beb-989e-d394b9c565de/quotations/26a27453-63d8-40fa-b274-53bcff4a8b3f)

* technical standards for eIDAS required
* DEG reinstating central processes

“The commission might also want to consider use cases where the digital identity of EU citizens is used beyond the boundaries of the EU.” [31:5 p 2 in Feedback from OpenID Foundation (eKYC & Identity Assurance WG) (NGO) F548976.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/ee61aebb-d489-4beb-989e-d394b9c565de/quotations/ba04e427-0735-46dc-aeec-ee323f29b3c5)

* Commission needs to consider the variety of contexts in which the digital identity can be used, for example, outside the EU; this is a client-based approach
* DEG Client-based or needs-based reorganisation

Text 69: other stakeholder 2020

“The introduction of digital identity trusted services, other than the eIDs already implemented under the eIDAS Regulation, should not be pursued. As previously noted, if this were to happen it could undermine the massive efforts, organizational and economic, put in place by the Member States that have already developed notified digital identity systems. As already mentioned, the employment of already existing eID schemes would enable significant synergies to be easily exploited” [30:2 p 2 in Feedback from Poste Italiane (Other) F548999.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/40549a79-1d1c-4f0d-b27f-1bb62cdb5ed4/quotations/b66c5fdb-82f7-4775-a217-76f9772be26e)

* the national government has the authority over the notification concerning the digital identity systems; existing eID schemes enable good synergies
* DEG Re-governmentalisation

Text 70: private stakeholder 2020

“eIDAS has significantly underperformed delivery expectations regarding the cross-border use of notified digital identity schemes, a situation that in our view has to do with the public-sector focus and inter-governmental perspective of the eIDAS framework for identity-related matters” [33:4 p 1 in Feedback from SGM CONSULTING - EVROTRUST (Company business) F548844.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b1969509-4af0-4edc-bef6-b90813a8e50c/quotations/1d87807c-6fa2-4126-a2cc-8cfbff2731c5)

* Shortcomings of the eIDAS due to its emphasis on the national public sector: unmet expectations for the cross-border utilisation of digital identity schemes and their notifications
* DEG Re-governmentalisation

Text 71: private stakeholder 2020

“We welcome the intention of the European Commission to extend the use of digital or electronic identification (e-ID) to the private sector and to offer the possibility of private sector provision of digital identities within the framework of a revised Regulation on electronic identification and trust services for electronic transactions” [29:1 p 1 in Feedback from Swiss Finance Council (Business association) F549007.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/67416cc1-2b7f-4673-b39f-6f523046eed8/quotations/cf37a004-eedd-4da5-9035-f3127447b5ba)

* private supply of digital identities
* NPM Quasi-markets

Text 73: private stakeholder 2020

“The eIDAS regulation has been a valuable milestone toward a common basis for trusted digital identities and trust services.” [26:4 p 1 in Feedback from Thales DIS (Company business) F548993.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/67cdbb2a-9855-4e70-b0e1-2fa52b46eb04/quotations/79a32cec-e316-439c-99b1-df9e6f1a1693)

* eIDAS regulation, as a common basis for digital identities and service, sets the standards for the EU
* DEG reinstating central processes

Text 74: other stakeholder 2020

“EU must give guidelines not only to digital identity and trustworthy services like current eIDAS, but must give guidelines (or directive) to member states on ID means.” [27:1 p 1 in Feedback from Tomáš Šedivec (EU citizen) F539560.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/111fbe87-db1b-42e6-af83-f6ab8cc4f05d/quotations/3f7188d1-ee32-4323-9224-9ecfaab54bc3)

* more EU guidelines like current eIDAS required, also for member states
* DEG reinstating central processes

“not enough to have 1 ID means (national ID card for example). There must be divided between personal ID means and profesional ID means.” [27:2 p 1 in Feedback from Tomáš Šedivec (EU citizen) F539560.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/111fbe87-db1b-42e6-af83-f6ab8cc4f05d/quotations/97bb6d04-3050-4838-bf87-f2e48052f589)

* the plurality of digital identities implies that users need different identities for different purposes, this resembles a needs-based approach
* DEG Client-based or needs-based reorganisation

Text 76: private stakeholder 2020

“A European Digital Identity scheme (EUid) is not preferred in our view ● There are existing systems in various EU member states that may not be compatible with an EUid” [24:6 p 3 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/6d586a3e-f899-441a-8043-ad6225fb32fc)

* naming incompatibility between EUid and national systems as a reason to reject the EUid suggests that it is a matter of national sovereignty to manage digital identity systems
* DEG Re-governmentalisation

“Option 3, which would introduce a European Digital Identity scheme (EUid), is not preferred in our view. Instead of an EUid, federated solutions could be considered instead; such federations will allow for better international interoperability, higher scalability, and be based on modern technology” [24:7 p 9 in Feedback from Yubico AB (Company business) F543642.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/8e6a5f80-7d6c-4a79-b39a-80c3af988b41/quotations/85c5d14f-488e-4af1-9307-061576b38385)

* Federated solutions recognise the relevance of national sovereignty
* DEG Re-governmentalisation

Text 77: EU document 2021

“the focus has shifted from the provision and use of rigid digital identities to the provision and reliance on specific attributes related to those identities.” [76:23 p 2 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/f9516a5a-aa6f-46dc-becb-e2f1f6261055)

* different purposes for digital identification may require different identity attributes to be shared; those purposes may depend on the user’s needs
* DEG: Client-based or needs-based reorganization

“shift for issuers of European digital identity solutions, providing a common technical architecture and reference framework and common standards to be developed in collaboration with the Member States.” [76:24 p 3 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/e5fbce72-c733-4613-aef9-7839886f7c27)

* digital identity solutions require cross-sectoral collaboration between member states and private issuers
* NPM Public-private partnerships

“Digital identity wallets are perceived more and more by the public and private sector as the most appropriate instrument allowing users to choose when and with which private service provider to share various attributes, depending on the use case and the security needed for the respective transaction.” [76:25 p 7 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/dfd122bb-3869-4f0e-93aa-bc14e8dde4c1)

* users can decide when and which data to share; this could imply that different types of shared attributes require different security levels depending on the user’s needs
* DEG: Client-based or needs-based reorganisation

“A more harmonised approach to digital identification should reduce the risks and costs of the current fragmentation due to the use of divergent national solutions and will strengthen the Single Market by allowing citizens, other residents as defined by national law and businesses to identify online in a convenient and uniform way across the Union.” [76:20 p 13 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/ed7d2ab8-fe40-4d64-a0b9-a77ad86711a1)

* diverging national digital identification solutions lead to fragmentation rather than harmonisation, so more harmonisation is necessary for a uniform approach to online identification
* DEG Reinstating central processes

“Member States should ensure equal access to digital identification to all their nationals and residents.” [76:21 p 14 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/0923a03e-2e3b-4ede-858e-f76c3c82825c)

* responsibility of the national government in providing access to digital identification of individuals
* DEG Re-governmentalisation

“All European Digital Identity Wallets should allow users to electronically identify and authenticate online and offline across borders for accessing a wide range of public and private services.” [76:26 p 14 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/967ecb95-d71e-4bab-9a85-f846e772bf7e)

* identification required to access cross-border electronic services
* DEG Interactive and ‘‘ask once’’ information-seeking

“‘European Digital Identity Wallet’ is a product and service that allows the user to store identity data, credentials and attributes linked to her/his identity, to provide them to relying parties on request and to use them for authentication, online and offline, for a service in accordance with Article 6a” [76:27 p 23 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/5a20d929-57c5-4355-9cb2-caf95a7e9a14)

* sharing of centrally stored data for service provision
* DEG Interactive and ‘‘ask once’’ information-seeking

# **Cluster 12: providers of trust services**

Text 1: EU document 2014

“All trust service providers should be subject to the requirements of this Regulation, in particular those on security and liability to ensure due diligence, transparency and accountability of their operations and services. However, taking into account the type of services provided by trust service providers, it is appropriate to distinguish as far as those requirements are concerned between qualified and non-qualified trust service providers.” [75:20 p 5 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/c1f8c5e4-be40-4e12-9e22-e3b3928148c9)

* the regulation stipulates requirements, which are applicable to providers of trust services; this implies the existence of standards
* DEG Reinstating central processes

“There shall be no restriction on the provision of trust services in the territory of a Member State by a trust service provider established in another Member State for reasons that fall within the fields covered by this Regulation.” [75:21 p 14 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/3e776443-0be2-46ee-bc9f-ae2d15360178)

* cross-border provision of trust services without national restrictions
* NPM Product market liberalisation

“The supervisory body shall verify whether the trust service provider and the trust services provided by it comply with the requirements laid down in this Regulation” [75:22 p 25 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/9a8c7bdd-a802-4a81-b1fc-647c83f53a6a)

* the compliance of trust service provider (as stipulated in the regulation) is verified by a supervisory body; this implies the existence of standards
* DEG Reinstating central processes

Text 41: other stakeholder 2020

“all the advantages for citizens who can use the same eID for public but also private services throughout Europe (One for All). All advantages that would not be possible with the provision of new trust services for identification.” [62:2 p 2 in Feedback from Anonymous F548950.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a64eacb2-d1d3-4a17-b355-3a327550e042/quotations/eee1ad76-7b34-482e-b065-5c7fefe9adde)

* the preference of existing eID services over new trust services for identification purposes implies that it is more beneficial to integrate existing services than create new ones to reduce fragmentation and hence enhance collaborative efforts
* DEG Joined-up governance

Text 62: private stakeholder 2020

“The legal effect provided to trust services by the eIDAS Regulation (e.g. qualified e-signature is equivalent to handwritten one) helped increase their admissibility in legal proceedings.

Agree” [154:3 p 5 in 2020 Feedback from Legal Studio (Company business) F548996 (form filled out)\_(private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/211b8a42-711d-4cf2-b287-fa71a6ac8b37/quotations/19f30018-18d3-46a7-a320-56ff3de610c2)

* Regulatory framework for trust services as a requirement for their legal recognition
* DEG Reinstating central processes

Text 69: other stakeholder 2020

“all the advantages for citizens who can use the same eID for public but also private services throughout Europe (One for All). All advantages that would not be possible with the provision of new trust services for identification.” [30:3 p 2 in Feedback from Poste Italiane (Other) F548999.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/40549a79-1d1c-4f0d-b27f-1bb62cdb5ed4/quotations/473a3709-1005-4944-b384-1462528b6528)

* the preference of existing eID services over new trust services for identification purposes implies that it is more beneficial to integrate existing services than create new ones to reduce fragmentation and hence enhance collaborative efforts
* DEG Joined-up governance

Text 77: EU document 2021

“While the evaluation of the eIDAS Regulation shows that the framework for the provision of trust services has been rather successful, providing a high level of trust and ensuring the uptake and use of most trust services, more needs to be done to reach full harmonisation and acceptance.” [76:16 p 3 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/8625a9b7-2e88-4651-b40d-a498e4d395fb)

* eIDAS regulation can be further improved by reaching more acceptance and harmonisation; this implies the need for more standardisation
* DEG Reinstating central processes

“The provision of Trust services and end-user products used in the provision of those services shall be made accessible for persons with disabilities” [76:18 p 31 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/8308775e-c6af-402b-8f62-2873e809c357)

* trust services should be accessible to people with disabilities
* DEG Client-based or needs-based reorganisation

“Supervisory bodies shall cooperate with a view to exchanging good practice and information regarding the provision of trust services.” [76:19 p 32 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/72e1330f-cdaa-4700-8b24-6366d0298d22)

* collaboration between supervisory bodies regarding the exchange of practices and information could imply the need to integrate practices and policies across organisational levels; this can improve partnerships with a variety of stakeholders
* DEG Joined-up governance

# **Cluster 13: identification within member states**

Text 1: EU document 2014

“The interoperability framework shall meet the following criteria: (a) it aims to be technology neutral and does not discriminate between any specific national technical solutions for electronic identification within a Member State” [75:16 p 19 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/dcdc3fa1-56cf-407e-acdb-aa6f1abe1bf2)

* Technology-neutral interoperability framework does not prefer any specific national technical solution; this facilitates integration and recognition of electronic identification solutions across the EU
* DEG Joined-up governance

Text 35: private stakeholder 2020

“article 9(3) states that the commission shall publish the list of notified electronic identity schemes. However, in the light of the current state of play highlighted above, this information is not sufficient to assess the interoperability of electronic identity schemes, and the possibility of cross border authentication. Therefore, the list defined by article 9(2) shall also indicate the status of effective recognition of electronic identity schemes between Member State (issuing Member State & accepting Member State).” [73:4 p 4 in Feedback from ACN - Alliance pour la Confiance Numérique (Alliance for Digital Trust) (Business association) F548675.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/a3eedf3f-01be-4051-bc8c-1c0e39853ce2/quotations/913bbe54-6a08-48c9-abcb-e1bb00e63e9c)

* effective recognition of different electronic identity schemes is required across the EU
* DEG Joined-up governance

# **Cluster 14: data requirements**

Text 1: EU document 2014

“Cross-border interoperability and recognition of qualified certificates is a precondition for cross-border recognition of qualified electronic signatures. Therefore, qualified certificates should not be subject to any mandatory requirements exceeding the requirements laid down in this Regulation.” [75:17 p 8 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/019c29ff-ba50-4f76-9754-9155eddc4ba4)

* for the cross-border recognition and interoperability of electronic signatures, minimal requirements of qualified certificates are sufficient —> minimal regulation implied
* NPM Light touch regulation

“Qualified certificates for electronic signatures shall not be subject to any mandatory requirement exceeding the requirements laid down in Annex I.” [75:18 p 29 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/8f358a57-83b6-4e74-b6df-9a05b556eff5)

* minimal requirements of qualified certificates are sufficient —> minimal regulation implied
* NPM Light touch regulation

“Qualified certificates for electronic seals shall not be subject to any mandatory requirements exceeding the requirements laid down in Annex III.” [75:19 p 33 in 2014.7.23. REGULATION (EU) No 910 2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/9f6ccf45-fb10-4d02-9306-47779f64f99f/quotations/42988a9f-deb6-4a22-a554-5b614227c774)

* minimal requirements of qualified certificates are sufficient —> minimal regulation implied
* NPM Light touch regulation

Text 51: private stakeholder 2020

“Each market participant could decide which level of trust is enough for him. We believe this is the case for most use cases including attested attributes and where a requirement defining this as a trust service will only introduce a middleman providing little value and obscuring the source and the responsibility of the attributes.” [47:2 p 1 in Feedback from Erste Group Bank AG (Company business) F548968.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/5c48f155-346f-49df-a6b8-7e34325429ef/quotations/ef6d396f-e2f1-4d10-b30b-266f9c9ebb82)

* individuals determine their own trust level without an intermediary
* NPM Light touch regulation

Text 77: EU document 2021

“the security and control offered by the European Digital Identity framework should give citizens and residents full confidence that the European Digital Identity framework will offer everyone the means to control who has access to their digital twin and to which data exactly. This will also require a high level of security with respect to all aspects of digital identity provisioning, including the issuing of a European Digital Identity Wallet, and the infrastructure for the collection, storage and disclosure of digital identity data.” [76:28 p 3 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/c29334fa-c980-4e18-aa50-5583372e3f78)

* it is up to the users to whom they grant access to their data
* DEG: data warehousing

“Qualified electronic attestations of attributes shall not be subject to any mandatory requirement in addition to the requirements laid down in Annex V. 3. Where a qualified electronic attestation of attributes has been revoked” [76:14 p 41 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/24c39ad0-d326-49b8-9841-3c006567305a)

* minimal requirements of qualified attestations are sufficient —> minimal regulation implied
* NPM Light touch regulation

“there is coherence with the European Strategy for Data and the proposed Regulation on European Data Governance, providing a framework to support data driven applications in cases when the transmission of personal identity data is required allowing users to be in control and fully anonymised.” [76:15 p 51 in 2021.6.3. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 910 2014 as regards establishing a framework for a European Digital Identity.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/b5b54ff2-db8a-4643-9c3a-6cf244badef7/quotations/f39f8793-a174-4335-8fbc-c05c21392d67)

* users have control over the transmission of their personal identity data, including who has access to where their data is stored; this is not heavily regulated
* NPM Light touch regulation

# **Cluster 15: European regulation**

Text 3: private stakeholder 2019

“There were simply no uniform legal and technical solutions that were compatible and mutually recognised. These problems were solved with the eIDAS Regulation. As a European regulation, it applies directly in all member states of the European Union and takes precedence over national law.” [22:16 p 6 in 2019 English-German Feedback from Bundesdruckerei GmbH (Company business) F487162 (private).pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/7167983f-a5db-4751-91f9-54750d66eb82/quotations/c0b407a0-cbc8-4e7d-87fa-a890610f31fa)

* application of the European regulation eIDAS presented as a solution to fragmentation
* DEG Reinstating central processes

Text 54: private stakeholder 2020

“Monitoring of usability status within each Member State by the European Commission with regular publications.” [45:23 p 4 in Feedback from Eurosmart (Business association) F549006.pdf](https://go.atlasti.com/a7407cd8-c058-449e-83b5-e07018c97283/documents/32c90593-e82d-45f8-a820-13c644945815/quotations/17a84b41-1220-4cf2-a24e-bcf537052391)

* Central monitoring of the usability status in EU countries promotes standardisation and coordination among organisations
* DEG Reinstating central processes