Evaluation of the driving licence rules

Eurosmart feedback the European Commission's staff working document

Eurosmart, the voice of the digital security industry represents amongst others, manufacturers of secure elements, semiconductors, smart cards and secure software.

Eurosmart and its members are fully committed to achieving the highest level of trust and security in the fields of physical and digital ID documents.

The evaluation conducted by the European Commission aims at assessing whether the specific objectives of the Directive 2006/126/EC have been achieved. Eurosmart would like to provide its feedback on the security of driving licence document and progress to be achieved with regards to digitalisation and citizen's mobility requirements.

Strengthen the security features for driving licence document

The third Driving Licence Directive from 2006 imposes a common standard format and security features. In several EU Member States where ID card is voluntary, the Driving licence can take over the function of the ID-Card. In other words, the driving licence may be used to prove the identity of an individual.

The new regulation on strengthening the security of ID cards and of residence documents, which has been adopted in 2019, introduces harmonised and stronger security for ID cards to reduce identity fraud. Hence, the security level of ID documents (driving licences, ID Cards and residence documents should be aligned and equal.

A secure element (chip) should be at least recommended for the uniform format for the European driving licence. This option would align the security level of the driving licence with the ID card. The annex 1 of the 2006 directive mentioning the provisions related to the EU driving licence model should be updated accordingly. Technical specifications should be in accordance with ISO/IEC 18013 standards in parallel with European specifications.

These security enhancements which are similar to the EU ID card security features, will allow effective controls of the Driving Licence across the European Union. For instance, national authorities will be able to swiftly control driving licence issued by another Member States with a high level of confidence, thereby facilitating control procedures and strengthening security throughout the European Union.

It is as well a key opportunity for Member States which recognised the driving licence as a proof of identity to reduce the risk of fraud or counterfeiting.

Evaluation and assurance level

To ensure a constancy with other legislation (eg. eTachograph regulation EC/2135/1998, Identity Card and residence document 2006/126/EC) the Driving Licence secure element (chip) must be certified against the EAL4+ evaluation assurance level.

A step further can be achieved towards digitalisation of driving licence to encourage European Citizen's mobility. Mobile application as "companion" could be used for dematerialised driving licence and should benefit from the same legal value. The security level of the mobile application should be comparable to physical documents. Therefore, Eurosmart recommends the certification of the mobile application within the SOG-IS framework reaching the VAN3

About us

Eurosmart, the Voice of the Digital Security Industry, is an **international non-profit association located in Brussels**, representing the **Digital Security Industry** for multisector applications. **Founded in 1995**, the association is committed to expanding the world's Digital secure devices market, developing smart security standards and continuously improving the quality of security applications.

Our members

Members are manufacturers of secure element, semiconductors, smart cards, secure software, High Security Hardware and terminals, biometric technology providers, system integrators, application developers and issuers.

EUROSMART members are companies (**BCA**, **Fingerprint Cards**, **Gemalto**, **Giesecke+Devrient**, **GS TAG**, **IDEMIA**, **IN GROUPE**, **Infineon Technologies**, **Inside Secure**, **Internet of Trust**, **Linxens**, **Nedcard**, **NXP Semiconductors**, **+ID**, **Prove & Run**, **Qualcomm**, **Real Casa de la Moneda**, **Samsung**, **Sanoïa**, **Sarapis**, **SGS**, **STMicroelectronics**, **Tiempo Secure, Toshiba**, **Trusted Objects**, **Trust CB**, **WISekey**, **Winbond**), laboratories (**Keolabs**, **Serma**, **Brightsight**, **Red Alert Labs**, **Cabinet Louis Renaud**), research organisations (**Fraunhofer AISEC, Institut Mines-Telecom - IMT, ISEN - Institut Supérieur de l'Électronique et du Numérique Toulon**), associations (**SCS Innovation cluster**, **Smart Payment Association**, **SPAC, Mobismart**, **Danish Biometrics**).

EUROSMART and its members are also active in many other security initiatives and umbrella organisations on EU-level, like CEN, ECIL, ETSI, ECSO, ESIA, ETSI, GP, ISO, SIA, TCG and others.