eID deserves its own standardisation mandate: a call to the European Commission

Background

In 2009, the European Commission issued the standardisation mandate M/460 to CEN, CENELEC and ETSI in the field of ICT applied to electronic signatures. The objective of this mandate was to update the European eSignature standardisation deliverables. Such deliverables were prepared to support the implementation of the eSignature Directive, adopted in 1999.

The mandate M/460 was given for a total maximum duration of four years.

Although M/460 is an old and expired mandate, it continues nowadays to be the basis of some standardisation work. This is the case, for instance, of ETSI TC ESI's current work on identity proofing and of its future work on digital identity. This is therefore a very large interpretation of M/460 which goes a lot beyond the initial remit of the mandate (electronic signature).

For a standardisation mandate in the field of digital identity

Digital identity is a crucial component of trust in the online word. Digital identity is not any trust services; it is the foundation of all trust services. Therefore, digital identity needs its own approach, its own legal requirements, and, consequently, its own standards. In a previous paper[1], Eurosmart explained that such requirements should include non-discrimination, privacy-by-design and security-by-design.

Eurosmart supports ETSI TC ESI's work on digital identity and contributes to it as a member of the group. There is a need for standardisation in the field of digital identity, this is undeniable. National initiatives are flourishing and there is a clear risk of fragmentation, making it harder for companies to do cross-border business. This need for standardisation becomes more urgent in the context of the upcoming initiative on a European digital identity (EUid). However, Eurosmart advocates for the right legal basis for such a standardisation work. This essential topic should not be standardised on the basis of an expired mandate.

eID deserves its own standardisation mandate! Eurosmart hopes that the European Commission can hear this call. For the sake of coherence, this new mandate should be prepared alongside the revision of eIDAS/proposal for a European digital identity.

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[1] Eurosmart, "How to ensure that identity services in Europe are preserving Europe's sovereignty", published in January 2021.

The mandate should include an inventory of standards applicable to digital identity, including mobile identity. A gap analysis should follow and a distribution of the standardisation tasks among CEN-CENELEC and ETSI.

Creating a coordination structure between CEN-CENELEC and ETSI

Eurosmart strongly believes that the standardisation work on digital identity should be shared and coordinated among CEN-CENELEC and ETSI. In the past, such a coordination existed for eSignature. It took the shape of the EESSI, the European Electronic Signature Standardisation Initiative. This body was set up to coordinate the work of CEN and ETSI, as a result of two Commission's specific mandates. EESSI operated from 1999 to 2004.

The EU needs to set up a similar body for digital identity: a European **Electronic Identity** Standardisation Initiative. However, this time, the coordination body should not stop operating right after the publication of the deliverables. It should keep working to support the adoption of standards by the industry.

CEN-CENELEC and ETSI have different working methods and approaches. CEN-CENELEC involves national standards agencies and reflects the standardisation work at international level (ISO/IEC), adapting it to a European context. In this respect, CEN-CENELEC has a truly European vision, where sovereignty is a key principle. ETSI benefits from the direct contribution of private companies from all around the world, including many trust service providers. ETSI is a dynamic forum where initiatives quickly flourish. In short, CEN-CENELEC and ETSI have a highly valuable and complementary expertise.

This complementarity also appears in content. For instance, CEN-CENELEC historically works on security evaluation methods, and has therefore developed a unique experience in the field. Thus, CEN-CENELEC is perfectly fit to elaborate security evaluation methods for the components of a digital identity infrastructure. ETSI has a long-proven track record in the field of certificate policy for trust services, which also makes it very well-positioned to contribute to the work on digital identity.

Eurosmart believes that only a close collaboration between CEN-CENELEC and ETSI can lead to a successful standardisation framework for digital identity. Eurosmart calls on the European Commission to give CEN-CENELEC and ETSI a strong and clear mandate dedicated to digital identity, including a mandate to share tasks and cooperate.

You will find detailed information on work sharing in the Annex.

Annex: distribution of topics between CEN-CENELEC and ETSI

CEN-CENELEC	ETSI
• Protection profiles & certification evaluation methodologies • All topics on electronic identification and authentication • Security requirements for digital ID online verification (risk analysis on ID & processes) • Technical compliance of digital ID schemes with EU data protection/location/processing • Technical compliance of digital ID schemes with EU legal provisions • Global framework of digital ID schemes based on mobile (stakeholders, governance principles)	• eSignature • Trust services not linked to eID

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The Voice of the Digital Security Industry

About us

Eurosmart, the Voice of the Digital Security Industry, is a **European 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 designers or manufacturers of secure elements, semiconductors, smart cards, systems on chip, High Security Hardware and terminals, biometric technology providers, system integrators, secure software and application developers and issuers. Members are also involved in security evaluation as laboratories, consulting companies, research organisations, and associations.

Eurosmart members are companies (**BCA, Bureau Veritas, CYSEC**, **Fingerprint Cards**, **G+D Mobile Security**, **GS TAG**, **IDEMIA**, **IN GROUPE**, **Infineon Technologies**, **Inside Secure**, **Linxens**, **Nedcard**, **NXP Semiconductors**, **+ID**, **PayCert**, **Prove & Run**, **Qualcomm**, **Real Casa de la Moneda**, **Samsung**, **Sanoïa**, **Sarapis**, **SGS**, **STMicroelectronics**, **Thales**, **Tiempo Secure**, **Toshiba**, **Trusted Objects**, **WISekey**, **Winbond, Xilinx**), laboratories (**Brightsight**, **Cabinet Louis Reynaud, CCLab, CEA-Leti, Jtsec, Keolabs**, **Red Alert Labs**, **Serma**,), consulting companies (**Internet of Trust, Trust CB**), 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 is member of several European Commission's groups of experts: Radio Equipment Directive, eCall, Multistakeholder platform for ICT standardisation, and Product Liability.

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