Eurosmart's answer to the European Commission's public consultation on Travel – digitalizing ID cards to make travelling easier

Eurosmart very much welcomes this proposal, as it will enable the digitalization of national identity cards, facilitating the exercise of the right to free movement within the EU/SAC Area for citizens. Additionally, the proposal leverages the EUDI Wallet, as introduced by the amendment to the eIDAS Regulation. However, Eurosmart has identified the following comments for this proposal:

1. Security Aspects:

Security aspects regarding Digital Travel Credentials (DTCs) are missing. If the security of DTCs is not ensured, it may undermine the trust users put in DTCs. Eurosmart recommends explicitly stating in Article 5 the security of: (1) issuance and disclosure process, (2) authentication and validation, and (3) revocation.

Additionally, Eurosmart recommends explicitly requiring in Article 2 that the issuance of DTCs shall rely on end-to-end encryption.

2. Definitions of "Creation" and "Issuance":

The proposal distinguishes between "creation" and "issuance" of DTCs but does not define these terms, not even in the recitals. From the text: (1) DTCs may be created from existing identity cards by Issuing Member States (Article 2.3); (2) DTCs may be created using the EU Digital Travel Application (Article 2.3 and Article 2.6); (3) DTCs may be issued to holders of identity cards by Issuing Member States (Article 2.2).

Additionally, it seems that: "Creation" of DTCs refers to an action under sole holder control without any actions from the issuer (Article 2.3, first paragraph), and "Issuance" of DTCs refers to an action under sole control of the Issuing Member State (Article 2.2).

Each term seems to have distinct meanings and technical implications that are not fully detailed. Eurosmart recommends that clear definitions should be added to clarify the differences.

3. Technical Feasibility of Creation:

Before the "creation" of DTCs, Article 2.3 (second paragraph) requires Member States to ensures the fulfillment of some actions. Yet, the creation of DTC appears to be an action under the sole

holder control, which seems to involve copying the identity card chip's content to another medium (e.g., a mobile phone). If so, the provision of Article 2.3 (second paragraph) is odd as it puts responsibility on Member States for something that is unclear. Thus, it should be clarified the distinction between DTC creation and DTC issuance onto a mobile.

4. Verification of the storage medium of the identity card:

Article 2.3 (second paragraph) states that "Member States shall ensure that the integrity and authenticity of the storage medium of the identity card are verified." This is insufficient. Member States should also verify the validity of the identity card (e.g., whether it has been revoked, suspended, or not revoked).

The proposal should clearly distinguish between the storage medium (chip) and the data stored on the storage medium, in particular with respect to Recital 7 and Article 2, which require Member States to verify the authenticity and integrity of the storage medium of the physical identity card before a DTC is created. This provision is ambiguous. Therefore, Eurosmart recommends clarifying (1) how this verification should be carried out (e.g. through the performing of an authentication protocol with the chip of the identity card), and that (2) it should also include the verification of the authenticity, integrity and validity of the data stored on the chip.

5. Stakeholder Involvement:

To prepare technical specifications and procedures under Article 5, Eurosmart suggests creating an expert group that includes stakeholders such as industry and carriers relevant to DTCs. This group could provide valuable input on technological choices, technology readiness, use case needs, and alignment with the EUDI Wallet.

6. Implementation Timeline:

Article 8 provides a 12-month implementation period for the provisions of Articles 2(1) and 2(2). This timeline seems too short given the time required for procurement, deployment, testing, and going live. Eurosmart suggests extending this period to 24 months.

7. Content of DTCs:

Article 2.4(d) states that DTCs shall "contain the same personal data, including facial image, as the identity card based on which they are issued or created." This could be interpreted narrowly, preventing the inclusion of up-to-date data in DTCs (e.g., a recent portrait or current address). Allowing such updates explicitly would increase trust in the quality of data provided through DTCs. Therefore, Eurosmart recommends clarifying this aspect in a dedicated recital.

8. Definition of DTCs:

A clear definition of DTCs more detailed than the one provided in Article 13 of the proposal on EU Travel Application, should be introduced, outlining their characteristics (e.g., assurance level, validity). Article 5 should focus on technical specifications, while legal considerations should be part of the core regulation. Additionally, a link to the EU Travel Application document (particularly Article 13) should be made clearer, and provisions on the EUDI Wallet should emphasize trust, security, and binding quality.

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9. Integration with the EUDI Wallet Ecosystem:

Digital travel credentials are intended to be used in European Digital Identity Wallet to enable their wider use in the digital identity wallet ecosystem. However, the proposal does not clarify the form DTCs will take under eIDAS (e.g., EAA, QEAA, PID) or which entity would play the role of (Q)EAA or PID provider, in particular when the EU Digital Travel Application is used to create DTC.

10. Viable Business Model:

For Article 2's provision on free-of-charge DTCs (ARES 12), Eurosmart recommends ensuring a viable business model for the private sector willing to (1) provide products, systems and services to support the uptake and deployment and DTC, but also (2) develop and propose use cases based on these DTCs.

11. Technical Integration of DTC within EUDI Wallet:

Clarifications are needed for the technical integration of DTCs in the EUDI Wallet framework. Key considerations include:

- Protocols for DTC Provisioning and Presentation. While ICAO specifications are suitable for border-crossing scenarios in the context of the EU Digital Travel Application, other standards, such as ISO/IEC 23220-4, may be more appropriate for broader use cases within the EUDI Wallet ecosystem.

- Security and Trust Requirements: Clear standards must be established for the security, trust level, and binding quality (with the wallet and the user) of DTCs within the EUDI Wallet to ensure reliability and trust.

- Privacy Considerations: As DTCs include sensitive data, such as the holder's portrait, robust privacy measures should be available to user when presenting a DTC with an EUDI Wallet. These could include mechanisms like selective disclosure of data contained in the DTC or the use of a lower-resolution portrait in certain use cases to safeguard privacy while maintaining functionality.

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.

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