

Position on strengthening the security standards of identity cards of Union citizens Regulation 2018/0104(COD)

Dear Civil Liberties, Justice and Home Affairs Committee,

We are writing to you regarding the forthcoming vote on security standards of identity cards in the EU to be held on 7 March.

General Support

Firstly, we would like to state that we generally support the Regulation and believe in the benefits, both security and practical, of some standardisation of Union identity documents.

One Major Issue - Fingerprints

Secondly, we would like to emphasise the out one major worry we have with the text negotiated with the Council. Despite the Civil Liberties committee adopting a position that would have left it up to the Member States whether they chose to save fingerprints on ID cards, the current version you are about on makes it mandatory.

To us, this is not a minor issue, but a central worry and we firmly oppose such an obligation:

1. Security Risk

As fingerprints would be saved on the ID card itself and identity cards a far more common and carried around most of the time, the risks of data being stolen is much higher than with passports. The equipment to collect fingerprints out of ID is easy to build and not expensive. As nowadays phones and banking application rely on fingerprint identification, the potential damages for citizens are colossal.

2. Not a necessary anti-fraud measure

The main security feature of fingerprints saved on ID cards would be that an authority could verify that the document indeed belongs to the holder, i.e. is not stolen. However, similar security can be achieved through facial recognition techniques. In this case, as portrait photos are already part of the data available on documents, no additional collection and administration of personal and private data would be required. Other cases of document fraud, e.g. falsified documents, can easily be countered by standard cryptographic measures without the need for any biometric data.

3. Privacy

Biometric data are sensitive data under the EU legal framework. It therefore enjoys special protection. The recording and use of two parallel sets of biometric data (facial photograph and fingerprints) is not necessary for security but is intrusive. It is therefore not proportionate.

We truly hope that you will take these arguments into account when casting your vote on 7 March and will ask the rapporteur to renegotiate this part of the Regulation with the Council.

epicenter.works
Vienna

Digital Republic
Sofia