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TO:
Directorate-General for Justice and Consumers
European Commission

Procedural reference: COM(2018) 212 final - 2018/0104 (COD)

Full title:
Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on strengthening the security of identity cards of Union citizens and of residence documents issued to Union citizens and their family members exercising their right of free movement

First of all, a lot of thanks to Directorate-General for Justice and Consumers for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:
– any business secrets
– any trade secrets
– any confidential information.

This opinion is public.
PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous consultations at the European Union level.
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]

45

46 Previous opinions

47

48 Annex 1 holds information about previous consultations and my previous opinions.

49

50 Here we can note that I have repeated the same issues based on previous consultations. Different
51 units of the European Commission already know something about my previous opinions

52

53 European Social Security Number / Reference: Ares(2017)5862503

54

55 Here we can note that Directorate-General for Employment, Social Affairs and Inclusion has
56 published their proposals for European Social Security Number (Reference: Ares(2017)5862503).

57

58 Possibly Directorate-General for Justice and Consumers could check information about that
59 consultation. Web page for that previous consultation is following

60

61 <http://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-5862503>

62 (this web page worked on 12 June 2018)

63

64 Finnish context

65

66 Here we can note that this document does not compare identity cards in different member states
67 (European Union).

68

69 In Finland we use extensively driver's licences for identifying personality for different stakeholders.

70

71 In Finland we do have identity cards but usage of identity cards is limited at the moment. Naturally
72 we also have passports in Finland.

73

74 Proposed article 3 (1)

75

76 Proposed article 3 contains following text:

77

78 (1) Identity cards issued by Member States shall be produced in ID-1 format and shall
79 comply with the minimum security standards set out in ICAO Document 9303 (seventh
80 edition, 2015).

81

82 **Proposal: ID-1 format means ISO/IEC 7810 standard.**

83 **Proposal: Information about ISO/IEC 7810 standard could be added here.**

84

85 Proposed article 3 (3)

86

87 Proposed article 3 contains following text:

88

89 (3) Identity cards shall include a highly secure storage medium which shall contain a facial

90 image of the holder of the card and two fingerprints in interoperable formats.

91

92 **About interoperability / Proposed article 3 (3)**

93

94 **About different standards**

95

96 I have proposed several times to use *open horizontal standards* when developing different
97 information systems.

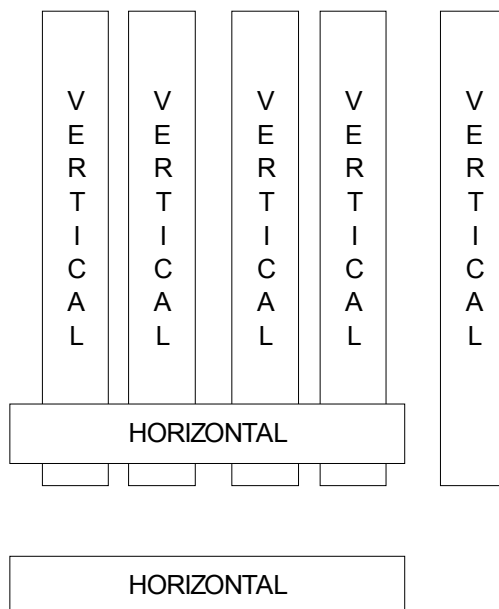
98

99 **Favouring open standards / Favouring horizontal standards**

100

101 There are differences between horizontal and vertical standards. A simple example is naturally
102 email solutions. There are several vertical standards when creating technically email solutions. Then
103 there are horizontal standards which enable sending messages between technically different email
104 solutions.

105



106

107

108 **Proposal: There could be assessment of vertical and horizontal standards.**

109

110 **Proposal: Using horizontal standards could be favoured when creating different
111 information systems on the European Union level.**

112

113 Horizontal standards enables technological solutions which can work together. Horizontal standards
114 hides different complexities in information systems.

115

116 **Opinion: The number of redundant standardisation efforts should be minimal.**

117

118 **Proposal: There could be separation of horizontal standards and vertical standards.**

119

120 **Proposal: There could be different standardisation efforts to horizontal standards and**
121 **vertical standards**

122

123 Personally I have advocated using different open horizontal standards. For example email standards
124 (horizontal) are implemented with very different technologies (vertical).

125

126 **About interoperability / Proposed article 3 (6)**

127

128 Proposed article 3 contains following text:

129

130 (6) Member States may enter details and observations for national use as required in the
131 light of their national provisions.

132

133 Here we can note that different national details can be vertical standards.

134

135 **Proposal: Different (vertical) national details (standards) should not hinder usage of**
136 **(European) other standards (horizontal).**

137

138 One option is naturally national microchips (vertical) which do not hinder usage of European Union
139 standards (horizontal).

140

141 **Proposed Article 9 (1)**

142

143 Proposed article 9 contains following text:

144

145 (1) Each Member State shall designate one authority as a contact point for the
146 implementation of this Regulation. It shall communicate the name of that authority to the
147 Commission and the other Member States. If a Member State changes its designated
148 authority, it shall inform the Commission and the other Member States accordingly.

149

150 **Each Member State shall designate a single point of contact**

151

152 **Note: I have proposed several times a single point of contact for each member**
153 **state.**

154

155 **Opinion: A single point of contact for each Member State can be supported.**

156

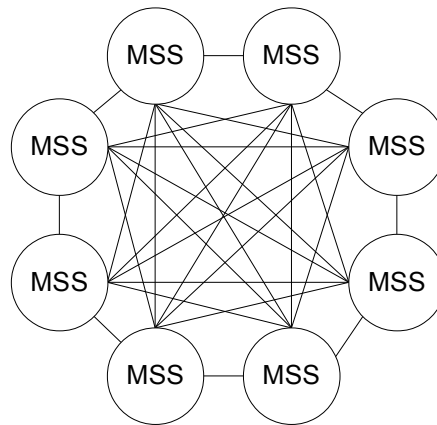
157 **Complexity at the European Union level**

158

159 I have noted several times that different member state systems (MSS) can interlinked in many ways.
160 This means that co-operation with European Union systems means a lot of work. This leads to the
161 question of a European Contact Point (EUCP) for different member state systems (MSS).

162

1



MSS = Member State System

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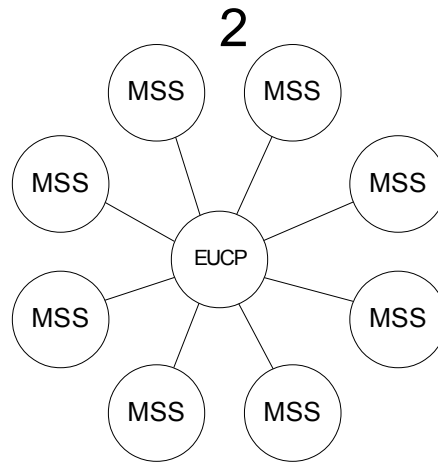
There are 28 member states (European Union) at the moment. In reality there are unique situations with information systems in different member states. In some cases information systems can be implemented based on complex system-to-system connections. Complex system-to-system connections means a lot of work when there are changes in some systems.

Here we can calculate connections based on number of information systems.

- 1 x 28 member state systems = 28 systems
- 5 x 28 member state systems = 140 systems
- 10 x 28 member state systems = 280 systems
- 15 x 28 member state systems = 420 systems
- 20 x 28 member state systems = 560 systems.
- 28 x 30 member state systems = 840 systems

Proposal: Complex system-to-system connections implemented in information systems could be assessed carefully.

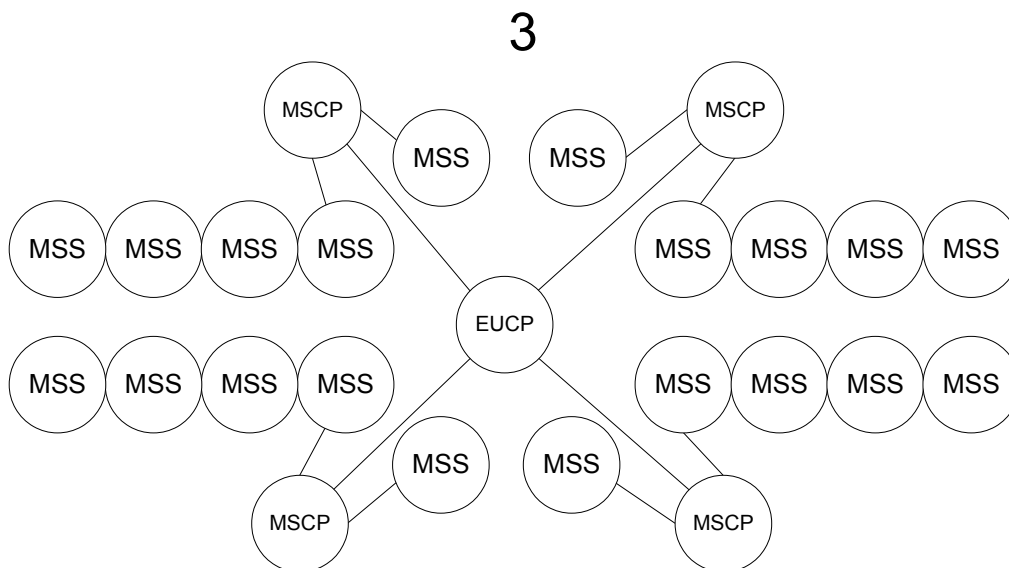
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MSS = Member State System
EUCP = European Contact Point

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Naturally there could be direct contacts between different member state systems (MSS) and European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large number of different member state system. Based on 28 member state systems there could be hundreds of connections. One option is to have a single European contact point for member state systems. Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There are unique situations with member statesystems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).



MSS = Member State System, MSCP = Member State Contact Point,
EUCP = European Contact Point

199
 200
 201

202

203 Based on those calculations there could be a lot of direct connections to the European contact point.
204 Number of those connections can be overwhelming. The situation between member states can vary
205 in many ways. So there can be different and unique systems between member states.

206

207 I have proposed several times creation of member state contact points which could handle different
208 system-to-system connections on member state level. Then it can be easier to create connections
209 between member state contact points and European contact point.

210

211 **Proposal: There could be one information system (member state contact point, MSCP)**
212 **on member state level.**

213

214 **Proposal: Different member state systems could be consolidated based on limited**
215 **number system-to-system connections (MSCP ↔ MSS).**

216

217 **Proposal: One information system (member state contact point, MSCP) on member**
218 **state level could handle system-to-system connections at the European Union level**
219 **(European contact point) (EUCP ↔ MSCP).**

220

221 **Proposal: There could be some serious work for developing a standardised member**
222 **state contact points (MSCP).**

223

224 **Proposal: After developing a standardised member state contact point (MSCP)**
225 **different member states could consolidate their systems (MSCP ↔ MSS).**

226

227 **Proposal: European Union contact point (EUCP) and member state contact points**
228 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European**
229 **Union level.**

230

231 Naturally we have to note that developing a standardised member state contact point (MSCP) means
232 more work. On the other hand a standardised member state contact point (MSCP) could handle
233 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
234 states may have more systems than other member states. We have to note that there are different
235 systems based on several technological solutions.

236

237 **Proposed Article 9 (2)**

238

239 Proposed article 9 contains following text:

240

241 (2) Member States shall ensure that the contact points are aware of and able to cooperate
242 with the existing and relevant information and assistance services at Union level, such as
243 Your Europe, SOLVIT, EURES, bodies foreseen under Article 4 of Directive 2014/54/EU,
244 Enterprise Europe Network and the Points of Single Contact

245

246 **Note: Here we can note that there are several European contact points (EUCP)**

247 **for different member state systems (MSS).**

248

249 **Proposal: There could be some efforts to consolidate different European contact points**
250 **(EUCP) for fewer European contact points (EUCP).**

251

252 **Proposed Article 11**

253

254 Proposed article 11 contains following text:

255

256 By 12 months after the entry into force at the latest, the Commission shall establish a
257 detailed programme for monitoring the outputs, results and impacts of this Regulation.

258

259 The monitoring programme shall set out the means by which and the intervals at which
260 the data and other necessary evidence are to be collected. It shall specify the action to be
261 taken by the Commission and by the Member States in collecting and analysing the data
262 and other evidence.

263

264 Member States shall provide the Commission with the data and other evidence necessary
265 for the monitoring.

266

267 **Proposal: Monitoring could mean following issues:**

268

- 269 • **usage of different standards (national and European standards)**
- 270 • **cooperation between European contact points (EUCP) and different**
271 **member state systems (MSS)**
- 272 • **actual interoperability between different systems (EU ↔ member states)**
- 273 • **problems of actual interoperability with different systems**

274

275 **New consultations based on monitoring**

276

277 **Proposal: Monitoring efforts could mean regular consultations addressed to different**
278 **stakeholders.**

279

280

281 **Good luck!!!**

282

283 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
284 opinions. This remains to be seen.

285

286

287 [Continues on the next page]

288

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291

ANNEX 1

292 My opinions to the previous and relevant consultations – there consultations were mostly organised
293 by the European Commission. General page to all consultations – both in English and in Finnish:

294 <http://www.jukkarannila.fi/lausunnot.html>

295

296

297 My opinions to the previous and relevant consultations – there consultations were mostly organised
298 by the European Commission.

299

300 EN: Opinion 1: Review of the rules on access to documents

301 http://www.jukkarannila.fi/lausunnot.html#nro_1

302

303 EN: Opinion 2: Schools for the 21st Century

304 http://www.jukkarannila.fi/lausunnot.html#nro_2

305

306 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
307 Safe and Innovative medicines

308 http://www.jukkarannila.fi/lausunnot.html#nro_3

309

310 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

311 http://www.jukkarannila.fi/lausunnot.html#nro_5

312

313 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

314 http://www.jukkarannila.fi/lausunnot.html#nro_6

315

316 EN: Opinion 8: European Interoperability Framework, version 2, draft

317 http://www.jukkarannila.fi/lausunnot.html#nro_8

318

319 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
320 proposal for comments

321 http://www.jukkarannila.fi/lausunnot.html#nro_9

322

323 EN: Opinion 15: Collective Redress

324 http://www.jukkarannila.fi/lausunnot.html#nro_15

325

326 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

327 http://www.jukkarannila.fi/lausunnot.html#nro_17

328

329 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

330 http://www.jukkarannila.fi/lausunnot.html#nro_18

331

332

- 333 EN: Opinion 19: Official Acknowledgement by the Commission
334 http://www.jukkarannila.fi/lausunnot.html#nro_19
335
- 336 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
337 http://www.jukkarannila.fi/lausunnot.html#nro_20
338
- 339 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
340 http://www.jukkarannila.fi/lausunnot.html#nro_21
341
- 342 EN: Opinion 23: Public consultation on the review of the European Standardisation System
343 http://www.jukkarannila.fi/lausunnot.html#nro_23
344
- 345 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
346 http://www.jukkarannila.fi/lausunnot.html#nro_27
347
- 348 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
349 http://www.jukkarannila.fi/lausunnot.html#nro_28
350
- 351 EN: Opinion 30: Internet Filtering
352 http://www.jukkarannila.fi/lausunnot.html#nro_30
353 NOTE: Organised by the European Committee for Standardization (CEN) ¹
354
- 355 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
356 http://www.jukkarannila.fi/lausunnot.html#nro_32
357
- 358 EN: Opinion 34: REMIT Registration Format
359 http://www.jukkarannila.fi/lausunnot.html#nro_34
360 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
361
- 362 EN: Opinion 35: Exploiting the employment potential of the personal and household services
363 http://www.jukkarannila.fi/lausunnot.html#nro_35
364
- 365 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
366 http://www.jukkarannila.fi/lausunnot.html#nro_37
367
- 368 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
369 http://www.jukkarannila.fi/lausunnot.html#nro_39
370
- 371 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
372 http://www.jukkarannila.fi/lausunnot.html#nro_40
373
- 374 EN: Opinion 41: AT.39398: observations on the proposed commitments
375 http://www.jukkarannila.fi/lausunnot.html#nro_41

1 <http://www.cen.eu/> (Accessed 2 July 2012)

2 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 376
377 EN: Opinion 42: Opening up Education
378 http://www.jukkarannila.fi/lausunnot.html#nro_42
379
380 EN: Opinion 43: Publication of extracts of the European register of market participants
381 http://www.jukkarannila.fi/lausunnot.html#nro_43
382 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
383
384 EN: Opinion 44: Evaluation policy guidelines
385 http://www.jukkarannila.fi/lausunnot.html#nro_44
386
387 EN: Opinion 45: About ICT standardisation
388 http://www.jukkarannila.fi/lausunnot.html#nro_45
389
390 EN: Opinion 46: Review of the EU copyright rules
391 http://www.jukkarannila.fi/lausunnot.html#nro_46
392
393 EN: Opinion 51: European Area of Skills and Qualifications
394 http://www.jukkarannila.fi/lausunnot.html#nro_51
395
396 EN: Opinion 52: Trusted Cloud Europe Survey
397 http://www.jukkarannila.fi/lausunnot.html#nro_52
398
399 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
400 http://www.jukkarannila.fi/lausunnot.html#nro_53
401 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
402
403 EN: Opinion 55: European Energy Regulation
404 http://www.jukkarannila.fi/lausunnot.html#nro_55
405 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
406
407 EN: Opinion 59: Green paper on mobile Health
408 http://www.jukkarannila.fi/lausunnot.html#nro_59
409
410 EN: Opinion 60: Cross-border inheritance tax problems within the EU
411 http://www.jukkarannila.fi/lausunnot.html#nro_60
412
413 EN: Opinion 61: European Register of Products Containing Nanomaterials
414 http://www.jukkarannila.fi/lausunnot.html#nro_61
415
416 EN: Opinion 64: Corporate Social Responsibility - European Commission
417 http://www.jukkarannila.fi/lausunnot.html#nro_64
418
419 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
420 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 421
422 EN: Opinion 68: European Network Code Stakeholder Committees
423 http://www.jukkarannila.fi/lausunnot.html#nro_68
424 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
425
426 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
427 http://www.jukkarannila.fi/lausunnot.html#nro_71
428 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
429
430 EN: Opinion 74: Enabling the Internet of Things
431 http://www.jukkarannila.fi/lausunnot.html#nro_74
432 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ³
433
434 EN: Opinion 80: Mandatory Transparency Register
435 http://www.jukkarannila.fi/lausunnot.html#nro_80
436
437 EN: Opinion 84: Revision of the European Interoperability Framework
438 http://www.jukkarannila.fi/lausunnot.html#nro_84
439
440 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
441 http://www.jukkarannila.fi/lausunnot.html#nro_86
442
443 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
444 http://www.jukkarannila.fi/lausunnot.html#nro_88
445
446 EN: Opinion 89: BEREC Guidelines for net neutrality rules
447 http://www.jukkarannila.fi/lausunnot.html#nro_89
448 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
449
450 EN: Opinion 93: Safety of apps and other non-embedded software
451 http://www.jukkarannila.fi/lausunnot.html#nro_93
452
453 EN: Opinion 95: Targeted consultation on eForms
454 http://www.jukkarannila.fi/lausunnot.html#nro_95
455
456 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
457 http://www.jukkarannila.fi/lausunnot.html#nro_97
458
459 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
460 http://www.jukkarannila.fi/lausunnot.html#nro_98
461
462 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
463 Regulators. Recast
464 http://www.jukkarannila.fi/lausunnot.html#nro_99

³ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 465
466 EN: Opinion 100: Protection of personal data (EU)
467 http://www.jukkarannila.fi/lausunnot.html#nro_100
468
469 EN: Opinion 101: Governance of the Energy Union
470 http://www.jukkarannila.fi/lausunnot.html#nro_101
471
472 EN: Opinion 102: Smart Wearables
473 http://www.jukkarannila.fi/lausunnot.html#nro_102
474
475 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
476 (ENISA)
477 http://www.jukkarannila.fi/lausunnot.html#nro_106
478
479 EN: Opinion 108: Single Digital Gateway
480 http://www.jukkarannila.fi/lausunnot.html#nro_108
481
482 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
483 http://www.jukkarannila.fi/lausunnot.html#nro_110
484
485 EN: Opinion 111: Interoperability of information systems for migration and security
486 http://www.jukkarannila.fi/lausunnot.html#nro_111
487
488 EN: Opinion 113: Transform of health and care
489 http://www.jukkarannila.fi/lausunnot.html#nro_113
490
491 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
492 Internet
493 http://www.jukkarannila.fi/lausunnot.html#nro_114
494 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
495
496 EN: Opinion 118: Fake news and online disinformation
497 http://www.jukkarannila.fi/lausunnot.html#nro_118
498
499 EN: Opinion 119: European Social Security Number
500 http://www.jukkarannila.fi/lausunnot.html#nro_119
501
502 EN: Opinion 120: European Labour Authority
503 http://www.jukkarannila.fi/lausunnot.html#nro_120
504
505 EN: Opinion 121: 2nd Data Package
506 http://www.jukkarannila.fi/lausunnot.html#nro_121
507
508
509

510

511 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European

512 Cybersecurity Research and Competence Centre

513 http://www.jukkarannila.fi/lausunnot.html#nro_122

514

515 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF

516 THE COUNCIL on the re-use of public sector information (recast)

517 http://www.jukkarannila.fi/lausunnot.html#nro_123

518

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528 [Continues on the next page]

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ANNEX 2

531 DISCLAIMERS

532

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570 The English explanation is on the following web page:

571 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

572



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574