
EuroGeographics feedback on EU revision of the 2014 eIDAS Regulation on electronic transactions

Ref no.2021-0040.LT

TR 51080067776-74

Brussels, 1st September 2021

Key points:

- EuroGeographics members, particularly Land registry and Cadastral authorities are highly reliant on an adequate level of security of electronic identification means and trust services.
- Even though the initial mission of our members was primarily meant to fulfil their national tasks, but it now appears that these same tasks have a true cross-border dimension. Our members are tackling trans-border real estate transactions.
- Transactions of real property at the European single market are in full force and we believe that the introduced European Digital Identity Wallet will further comfort and secure it.
- We welcome the principle of users having full control over what data they chose to share to identify themselves with online services, and to keep track of such sharing.
- We fully support this initiative of building on the existing eIDAS Regulation in order to remove discrepancies between countries in implementing cross-border identification systems.

EuroGeographics is an independent international not-for-profit organisation representing Europe's National Mapping, Cadastral and Land Registration Authorities (NMCAs). We are a passionate advocate for European geospatial data from official trusted sources, in particular when it is harmonised to standard specifications. Our members are providers of a range of products and services and expertise which supports navigation, automated vehicles management, emergency response, a when it comes to this specific consultation, of reliable and secure land and property market, fiscal and many more government and business decisions and services.

As producers and providers of trusted data from official trusted source our members are very much dependent on an adequate level of security of electronic identification means and trust services. Therefore, we have a special interest to the development of the eIDAS Regulation.

Many of our members have embraced new technologies as they were developed and set a goal of full digitalisation of their entire work processes including registering transactions of real property within the European single market. This is a highly sensitive public sector area with a very substantial value at stake. The main concern of our members was on securing cross-border electronic signatures, seals, time stamps, or electronic documents that are recognised within EU.

Some of our members have developed a good system to protect personal data, allowing access to all non-personal data for everybody and ensures that only the “right” person can access it.

In parallel, barriers in cross-border transactions are still being experienced as the existing Regulation does not contain any obligation for Member States to provide their citizens with a digital identification system enabling secure access to public services or to ensure their use across EU borders.

Having property in one country and fully making use of owners’ rights remotely from another country of residence is a more and more frequent European way of life for many citizens. Transactions of real estate property at the European single market are in full flow. It is currently very complex, if not impossible, for a citizen from a country A (who benefits from an e-identification in that country A) to conclude a real estate transaction with e-identification in country B (where another e-identification system is in place) and we believe that European Digital Identity Wallet as introduced in this proposal will further enhance and secure it. Many other examples could illustrate the ongoing difficulties.

As a result, we welcome the principle of users having full control over what data they chose to share to identify themselves with online services and to keep track of such sharing. Giving full control to users to choose which aspects of their identity, data and certificates they share with third parties, and keep track of such sharing matches with principles already adopted and implemented within our membership.

We fully support this initiative of building on the existing eIDAS Regulation in order to remove discrepancies between countries in implementing cross-border identification systems. It will make both citizens’ and providers’ of public sector services reality easier.

We express our interest in the further development of this legal debate. If you need any further clarifications, please do not hesitate to contact: lea.bodossian@eurogeographics.org

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