

# EUROPEAN CONFERENCE



*Paris, April 25th 2024*

**QTSPs IMPLEMENTING ACTS PROPOSITIONS AFTER  
eIDASv2 ADOPTION**

# eIDAS v2: implementing acts ClubPSCo's propositions

- Proposal for :
  - Non-qualified Trust Service Providers
  - Qualified Trust Service Providers
  - Electronic signature
  - Qualified electronic signature creation devices
  - eIDAS v1 trust services
  - New eIDAS v2 trust services

# eIDAS v2: implementing acts ClubPSCo's propositions

## Non-qualified Trust Service Providers

Article 19a	Requirements for non-qualified trust service providers
<i>i. registration and on-boarding procedures to a trust service</i>	Require non-qualified TSP's to write and publish "policies" (ex: CP) and associated "terms of services" (TOS): <ul style="list-style-type: none"><li>- based on common templates (PDS structure, ETSI 319411-1 for certificate management and equivalent for other type of Trust Service)</li><li>- written in a clear language, published on a web site protected with QWAC, secured with a qualified seal (or signature)</li></ul> Non QTSPs need to inform end users about the risks, limits, of using their respective non-qualified services (ex : "use non QTSP can be dangerous")
<i>ii. procedural or administrative checks needed to provide trust services</i>	Ask for ISO27001 certification (including a risk analysis)
<i>iii. management and implementation of trust services.</i>	Ask for non QTSP self-registration at supervisory body level Ask for an incident public contact Ask for training of the Trust Service Provider staff

# eIDAS v2: implementing acts ClubPSCo's propositions

## Qualified Trust Service Providers

Article 24.2	Requirements for qualified trust service providers
	<p>Specify and limit the list of major changes requiring prior notification to the supervisory body (modification of the Service policy, or the associated T&amp;C, change of service provider, HSM hardware change, etc.)</p> <p>Refer ETSI EN 319 401</p> <p>For trustworthy system/product: Impose conformance to Common Criteria ISO/IEC 15408 and PP CEN EN 419 221-2, CEN EN 419 221-3, CEN EN 419 221-4, CEN EN 419 221-5</p> <p>For cryptographic techniques: Impose, by priority order, ETSI TS 119 312 and SOG-IS</p>

# eIDAS v2: implementing acts ClubPSCo's propositions

## Electronic signature

<b>Article 24.1</b>	<b>Requirements for identity verification in qualified trust services</b>
	<p>Enforce and specify the requested hybrid manual and automated operations for remote identity proofing</p> <p>Define an exhaustive list of liveness detection checkpoints</p> <p>Define performance test cases for identity document validation</p> <p>Explicitly define the technical requirements for a high level of confidence of other identification method (24.1a.(c))</p>
<b>Article 28</b>	<b>Qualified certificates for electronic signatures</b>
	<p>Explicitly define the technical requirements for authentication means ensuring the private key sole control by the signer, either for qualified and non-qualified signature creation devices</p>

# eIDAS v2: implementing acts ClubPSCo's propositions

## Qualified electronic signature creation devices

<b>Article 29a</b>	<b>Requirements for a qualified service for the management of remote qualified electronic signature creation devices</b>
	<p>Refer ETSI TS 119 431-1 at EUSCP level</p> <p>Identification and authentication level :</p> <ul style="list-style-type: none"><li>- maintain LoA substantial &amp; high for eID means as defined for SCAL2 in prEN 419241-1</li><li>- authorize authentication by qualified electronic attestations of attributes</li></ul> <p>Do not include signature service requirement. What You See Is What You Sign (WYSIWYS) as defined in ETSI TS 119 431-2 shall not be enforced</p>
<b>Article 31</b>	<b>Publication of a list of certified qualified electronic signature creation devices</b>
	<p>Define QSCD attributes to insert in the list :</p> <ul style="list-style-type: none"><li>- certification end date</li><li>- certification level</li><li>- product certification scope</li><li>- remote signing capability</li><li>- ...</li></ul>

# eIDAS v2: implementing acts ClubPSCo's propositions

## eIDAS v1 trust services (1/2)

<b>Article 42</b>	<b>Requirements for qualified electronic time stamps</b>
	Refer EN 319 421 with an update to : <ul style="list-style-type: none"><li>- Enforce usage of a hardware time server for clock synchronization</li><li>- Enforce several time sources of different types (GPS, radio...) so that usage of NTP over Internet only is considered as non-sufficient</li></ul>
<b>Article 44</b>	<b>Requirements for qualified electronic registered delivery services</b>
	Refer EN 319 521 No implementing act for interoperability, or <ul style="list-style-type: none"><li>- Alternative 1: Refer TS 319 5x2 series only for TSP claiming interoperability with another TSP</li><li>- Alternative 2: Same as alternative 1 with exclusion:<ul style="list-style-type: none"><li>(i) for interoperability at National Level</li><li>(ii) for one-to-one interoperability with another TSP in the scope of a partnership</li></ul></li></ul>
<b>Article 45</b>	<b>Requirements for qualified certificates for website authentication</b>
	No implementing act regarding cybersecurity measures on web browsers Refer ETSI EN 319 411-2 for QWAC management

# eIDAS v2: implementing acts ClubPSCo's propositions

## eIDAS v1 trust services (2/2)

<b>Article 32</b>	<b>Requirements for the validation of qualified electronic signatures</b>
	Refer EN 319 102-1 and TS 119 102-1 for validation procedure Refer TS 119 612 & TS 119 615 for Trusted List integration & interpretation Do not refer formats and plug tests to let the TSP choose supported signatures
<b>Article 32a</b>	<b>Requirements for the validation of advanced electronic signatures based on qualified certificates</b>
	Same as qualified electronic signature excluding requirements on QSCD
<b>Article 33</b>	<b>Qualified validation service for qualified electronic signatures</b>
	Refer TS 119 441 for service policy Refer EN 319 102-1 and TS 119 102-1 for validation procedure Exclude validation protocol and validation report to allow more flexibility Do not refer formats and plug tests to let the TSP choose supported signatures
<b>Article 34</b>	<b>Qualified preservation service for qualified electronic signatures</b>
	Refer TS 119 511. Refer TS 119 512 only as a recommendation since its requirements (especially regarding exchange format) appear to be beyond the eIDAS requirements Recommend to store the validation reports, together with validation data, in a qualified archiving service.



# eIDAS v2: implementing acts ClubPSCo's propositions

## New eIDAS v2 trust services

<b>Article 45d</b>	<b>Requirements for qualified electronic attestation of attributes</b>
	Rely on EUDIW pilot projects results
<b>Article 45e</b>	<b>Verification of attributes against authentic sources</b>
	Include professional attributes in the catalogue of attributes specification, such as <ul style="list-style-type: none"><li>- regulated profession identification</li><li>- legal identifier type for natural and legal person</li><li>- natural person title</li><li>- ... (see ClubPSCo "eIDPro" deliverable)</li></ul>
<b>Article 45j</b>	<b>Requirements for qualified electronic archiving services</b>
	Rely on CEN/TC 468 and ISO/TC 171 workgroup results
<b>Article 45l</b>	<b>Requirements for qualified electronic ledgers</b>
	<i>No proposition on this topic</i>