



Open Public Consultation – Temporary Legislation Covid19 Test certificates

15th March 2021

Dear sir/madam,

We like to thank the Government of The Netherlands for this opportunity to provide input to the proposed temporary legislation for Covid19 Test Certificates.

We like to emphasize the need not just to focus on Covid19 Test Certificates but also Proof of Vaccination Certificates in an International context to ensure that Test or Vaccination Certificates facilitate free movement of persons within the European Union. Test and Vaccination Certificates issued in one Member State should be trusted and accepted by another Member State and internationally.

The Good Health Pass Collaborative and the EU Digital Green Certificates have been initiated to ensure international interoperability and based on core principles of security, privacy, and inclusivity.

Through international standardization institutes like ETSI an EU Trust Framework for Digital Green Certificates should be accelerated and implemented with a couple of months.

For test and vaccination certificates Member States should be working in an open public/private collaboration and leverage existing Digital Identity Trust Frameworks like eIDAS and based on the principles from Good Health Pass, ID4D of the World Bank and others.

We have seen a per country effort related to contact tracing and the difficulty with international exchange of trusted data and travel. Based on already existing minimum interoperability standards for Covid19 Vaccination and Test Certificates and standardized QR codes there is no need for a mandatory App from each Member State government.

Focus for the coming months should be on European and global collaboration and large-scale pilots to test and evaluate international interoperability.

Test and Vaccination Certificates should be linked to eIDAS level of assurance high and be able to also be verified using existing eIDAS Trust Framework, ICAO biometric proofing as has been used for international travel and border control.

The Security level of Covid19 Test and Vaccination Apps should be on Level of Assurance level High and leverage existing hardware crypto frameworks to ensure existing digital signature and encryption frameworks are leveraged.



The following activities are suggested to work on, in line with Good Health Pass / Digital Green Certificates:

- Principles & Guidelines for Interoperability
 - o [EU Trust Framework](#)
 - o [ID Binding +](#)
 - o [Authentication](#)
- Interoperability Scheme
 - o [Interoperability Standards](#)
- Minimum Data Schema
 - o [Vaccination Schema](#)
 - o [Test Result Schema](#)
- QR code for Test and Vaccination results sharing
- Decentralized Verifiable Credential (W3C)
- Mutual Recognition of test results
 - o [Registry \(Vaccinators\)](#)
 - o [Registry \(Labs\)](#)
- (Self-)Certification
 - o [Implementation Guidance](#)
- Interoperability Testing

Yours Sincerely,

Author: Harm Jan Arendshorst, Chief Executive Officer

Email: harm.arendshorst@ilabs.ai

Mobile: +31 655 787 474