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NOTE

From: To:	Presidency JHA Counsellors (Visa, Frontiers, Schengen)
Subject:	Proposal for a Regulation of the European Parliament and of the Council establishing an application for the electronic submission of travel data ("EU Digital Travel application") and amending Regulations (EU) 2016/399 and (EU) 2018/1726 of the European Parliament and of the Council and Council Regulation (EC) No 2252/2004, as regards the use of digital travel credentials - State of play articles 3a, 3b, 3c and 3d

Delegations will find in the annex a four column table with the Commission proposal, the EP position, the Council position and the draft agreement. The latter reflects the current state of play regarding the draft compromise wording on articles 3a, 3b, 3c and 3d. Please note:

- The track changes indicate changes vis-à-vis the Council's mandate.
- Text/rows marked in green indicate where the Presidency and the Rapporteur teams have found a preliminary agreement.
- Text/rows in square brackets indicate where the Presidency and the Rapporteur have not yet found a preliminary agreement.
- Some additions of the Parliament relate to text that has been provisionally moved from other parts of their mandate. In some cases, the Presidency agrees on the principle behind these additions pending a decision on where to place such text. Presidency comments are in *italics*.

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing an application for the electronic submission of travel data ("EU Digital Travel application") and amending Regulations (EU) 2016/399 and (EU) 2018/1726 of the European Parliament and of the Council and Council Regulation (EC) No 2252/2004, as regards the use of digital travel credentials

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	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.CEU Draft compromise
Article 3, first paragraph, point (-k)				
58k			**Article 3a** **Mobile component**	Article 3a *[*Mobile component */ application]*
Article 3, first paragraph, point (-l)				
58l			**1.The mobile component shall enable users to create digital travel credentials and enter self-declared travel data or EES pre-enrolment data. Digital travel credentials created in the mobile component shall be stored locally on the traveller's mobile device.**	1.The mobile component shall enable users to create digital travel credentials *[for single or multiple use]* and enter self-declared travel data *[*or EES pre-enrolment data*]. [*~~-~~ Digital travel credentials created in the mobile component shall be stored locally *through the mobile component* on the traveller's mobile device.*]* Integration with IT systems
Article 3, first paragraph, point (-m)				
58m			**2.The mobile component shall include an interface allowing travellers to use an app for mobile devices in accordance with article 6(2)(e) of Regulation (EU) 2018/1240, including to**	2.*[*The mobile component shall include an interface allowing travellers to use an app for mobile devices in accordance with article 6(2)(e) of Regulation (EU) 2018/1240, including to submit a travel authorisation application.*]*

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			submit a travel authorisation application.	Integration with IT systems
Article 3, first paragraph, point (-n)				
58n			**3.The mobile component shall include an interface allowing travellers to use an app for mobile devices in accordance with article 2a of Regulation (EC) 767/2008, including to submit an application for a digital visa.**	3.[The mobile component shall include an interface allowing travellers to use an app for mobile devices in accordance with article 2a of Regulation (EC) 767/2008, including to submit an application for a digital visa.] Integration with IT systems
Article 3, first paragraph, point (-o)				
58o			**4. The mobile component shall provide an interface to the webservice referred to in Article 13 of (EU) 2017/2226 allowing third–country nationals to inter alia verify at any moment the remaining authorised stay in accordance with Commission Implementing Regulation (EU) 2022/1409.**	4.–[The mobile component shall provide an interface to the webservice referred to in Article 13 of (EU) 2017/2226 allowing third–country nationals to inter alia verify at any moment the remaining authorised stay in accordance with Commission Implementing Regulation (EU) 2022/1409.] Integration with IT systems
Article 3, first paragraph, point (-p)				
58p			**5.The mobile component shall be available in all the official languages of the Member States and other languages in accordance with the implementing act referred to in article 16(1a).**	5.The mobile component shall be available in all the official languages of the ~~Member States~~European Union. Additional languages shall be specified in an implementing act in accordance with Article 16(1)(a).~~and other~~

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				~~languages in accordance with the implementing act referred to in article 16(1a).~~
Article 3, first paragraph, point (-q)				
58q			**6.The mobile component shall contain practical information regarding the creation of a digital travel credential as well as the processing of personal data.**	6.The mobile component shall contain practical information regarding the creation of a digital travel credential ~~*as well as*~~***, the scanning of the chip in the travel document, the purposes of the EU Digital Travel application and*** the processing of personal data.
Article 3, first paragraph, point (-r)				
58r			**7.Any use of the mobile component in relation to minors shall be electronically signed by a person exercising permanent or temporary parental authority or legal guardianship.**	*Political item for discussion*
Article 3a(7), point (a)				
58s				**8. The mobile application shall respect privacy and data protection by design and by default, taking into account the state of the art in security and the safety of the data it contains. The mobile application shall be subject to high security standards to ensure that unauthorised access or unauthorised use is not possible**.

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	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.CEU Draft compromise
				Addition from the EP. The principle is ok for the Presidency, pending a decision on where to place it.
Article 3a(9)				
58t				**[9. The mobile application shall allow carriers to access the digital travel credential for the purposes of Regulations (EU) 2025/12 and (EU) 2025/13, subject to the explicit consent of the user. Carriers accessing the digital travel credential shall not be allowed to collect any biometric data in accordance with Regulations (EU) 2025/12 and (EU) 2025/13.]** *Pending discussion line 74i.*
Article 3a(10)				
58u				10. The mobile application shall be easily accessible to users and free of charge. Specific attention shall be paid to the accessibility of the mobile application for *[vulnerable persons]*. *Addition from the EP. The principle of the first sentence is ok for the Presidency, pending a decision on where to place it. The second sentence is subject to confirmation.*

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Article 3a(11)				
58v				/11. The use of end-to-end encryption shall be mandatory for every data submission through the application, in order to take account of the sensitivity of the data concerned./ *Addition from the EP. Pending discussion*
Article 3a(12)				
58w				12. The mobile application shall also contain a clear and easily accessible mechanism where the user can exercise their right to withdraw consent. *Addition from the EP. The principle is ok for the Presidency, pending a decision on where to place it.*
Article 3a(13)				
58x				13. The technical specifications of the mobile application shall be adopted in accordance with Article 16(1), point (a). *Addition from the EP. The principle is ok for the Presidency, pending a decision on where to place it.*

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Article 3a(14)				
58y				
Article 3, first paragraph, point (-s)				
58z			**Article 3b** **Backend validation service**	~~*Article 3b*~~ ~~*Backend validation service*~~ ***Article 3b*** ***Backend validation service***
Article 3, first paragraph, point (-t)				
58aa			**1.The backend validation service shall enable the electronic verification of the chip of a travel document referred to in Article 4(1) to confirm that:**	1.The backend validation service shall enable the electronic verification of the chip of a travel document referred to in Article 4(1) to confirm that:
Article 3, first paragraph, point (-t)(i)				
58ab			**(a) the travel document in question was issued by a legitimate authority;**	(a) the travel document in question was issued by a legitimate authority;
Article 3, first paragraph, point (-t)(ii)				
58ac			**(b) the data extracted from a chip has not been altered since the issuance of the travel document;**	(b) the data extracted from a chip has not been altered since the issuance of the travel document;
Article 3, first paragraph, point (-u)				
58ad			**2.The backend validation service shall, in accordance with the implementing act referred to in Article 16(1a), verify the liveness of the user of the mobile**	2.The backend validation service shall, in accordance with the implementing act referred to in Article 16(1a), verify the liveness of the user of the mobile

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			component and enable the comparison of a live facial image taken by the user of the mobile component against the facial image extracted from the chip of the travel document. The confidentiality, integrity and authenticity of the live facial image shall be protected against high potential attacks in accordance with Commission Implementing Regulation (EU) 2015/1502.	component and enable the comparison of a live facial image taken by the user of the mobile component against the facial image extracted from the chip of the travel document. The confidentiality, integrity and authenticity of the live facial image shall be protected against high potential attacks in accordance with Commission Implementing Regulation (EU) 2015/1502.
Article 3, first paragraph, point (-v)				
58ae			**3.The backend validation service shall enable the issuance of digital travel credentials to European Digital Identity Wallets following the format of electronic attestations of attributes.**	3. [The backend validation service shall enable the issuance of digital travel credentials to European Digital Identity Wallets following the format of electronic attestations of attributes.]
Article 3, first paragraph, point (-w)				
58af			**4.The backend validation service shall enable the use of its functionalities by the mobile component and by European Digital Identity Wallets.**	4. [The backend validation service shall enable the use of its functionalities by the mobile component and by European Digital Identity Wallets.]
Article 3, first paragraph, point (-x)				
58ag			**Article 3c Traveller Router**	~~*Article 3c*~~ ~~*Traveller*~~***Article 3c Digital Travel Credential*** Router
Article 3, first paragraph, point (-y)				

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58ah			**1.The Traveller Router shall provide users of European Digital Identity Wallets with an interface for the purposes of obtaining digital travel credentials from those Wallets and entering self-declared travel data.**	1.***[The Digital Travel Credential*** ~~*The Traveller*~~ Router shall provide users of European Digital Identity Wallets with an interface for the purposes of obtaining digital travel credentials from those Wallets and entering self-declared travel data.***]***
Article 3, first paragraph, point (-z)				
58ai			**2.The Traveller Router shall enable receiving travel data and EES pre-enrolment data from the mobile component.**	2.The ~~*Traveller*~~***Digital Travel Credential*** Router shall enable receiving travel data ***[***and EES pre-enrolment data***]*** from the mobile component. Integration with IT systems
Article 3, first paragraph, point (.a)				
58aj			**3.The Traveller Router shall enable transmitting travel data and EES pre-enrolment data to the competent authority.**	3.The ~~*Traveller*~~***Digital Travel Credential*** Router shall enable transmitting travel data ***[***and EES pre-enrolment data***]*** to the competent authority. Integration with IT systems
Article 3, first paragraph, point (b)				
58ak			**4.All personal data transmitted to or via the Traveller Router shall be end-to-end encrypted according to encryption standards appropriate to the level of protection required for the processed data.**	4.All ***[***personal data***]*** transmitted to or via the ~~*Traveller*~~***Digital Travel Credential*** Router shall be end-to-end encrypted according to encryption standards appropriate to the level of protection required for the processed data.

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Article 3, first paragraph, point (c)				
58al			**5. The Traveller Router shall enable standardised information to be sent automatically to travellers as set out in the implementing act referred to in Article 16(1a).**	5. ***[The Digital Travel Credential*** ~~*The Traveller*~~ Router shall enable standardised information to be sent automatically to travellers as set out in the implementing act referred to in Article 16(1a).***]***
Article 3, first paragraph, point (a)				
59	(a) a mobile application, enabling the creation of digital travel credentials for single or multiple use and the entry of self-declared travel data;	(a) a mobile application, enabling the creation***, storage and submission of the*** ~~*of*~~ digital travel ~~*credentials*~~***credential*** for single or multiple use***,*** and the entry ***and submission of the*** ~~*of*~~ self-declared travel data;	~~(a) a mobile application, enabling the creation of digital travel credentials for single or multiple use and the entry of self-declared travel data;~~	***6. [eu-LISA shall ensure that the Digital Travel Credential Router is designed and developed in such a manner that the Digital Travel Credential Router provides the functionalities specified in this Regulation. The router shall, where appropriate and to the extent technically possible, share and reuse the technical components, including hardware and software components, referred to in Regulation (EU) 2025/12.]*** *Addition from the EP. Pcy considers superfluous (line 61c and 16d in Council mandate).*
Article 3, first paragraph, point (b)				
60	(b) a backend validation service, ensuring the confirmation of the authenticity and integrity of the chip data or the digital travel credential using available	(b) a backend validation service, ensuring the confirmation of the authenticity and integrity of the ~~*chip*~~ data ***on the storage medium (the 'chip')*** or the digital travel	~~(b) a backend validation service, ensuring the confirmation of the authenticity and integrity of the chip data or the digital travel credential using available~~	***7. [eu-LISA shall host the Digital Travel Credential router in its technical sites.]***

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	certificates and where applicable, the matching of the facial image taken from the user to the travel document or digital travel credential;	credential using available certificates and where applicable, the matching of the facial image taken from the user to the travel document or digital travel credential;	~~certificates and where applicable, the matching of the facial image taken from the user to the travel document or digital travel credential;~~	*Addition from the EP. Pcy considers superfluous (line 61c).*
Article 3, first paragraph, point (c)				
61	(c) a Traveller Router, which shall ensure secure and encrypted communication between the mobile application and the receiving authority.	(c) a ~~*Traveller*~~***Digital Travel Credential*** Router, which shall ensure secure and ***end-to-end*** encrypted ~~*communication*~~***transmission of the travel data, pursuant to Article 5,*** between the mobile application and the ~~*receiving*~~***competent border*** authority.	~~(c) a Traveller Router, which shall ensure secure and encrypted communication between the mobile application and the receiving authority.~~	***8. [eu-LISA shall be responsible for the technical management of the Digital Travel Credential Router, including its maintenance and technical developments, in such a manner as to ensure that the data are securely, effectively and swiftly transmitted through the Digital Travel Credential Router, in accordance with this Regulation.]*** *Addition from the EP. Presidency considers superfluous (61C)*
Article 3, first paragraph a				
61a		***The source code of the software components of the EU Digital Travel application shall be open-source licensed.***		*No agreement reached yet*
Article 3c(10)				
61b				***[9. eu-LISA's staff shall not have access to any of the data that are transmitted through the Digital Travel Credential Router. However, that prohibition shall***

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				not preclude eu-LISA's staff from having such access insofar as strictly necessary for the maintenance and technical management of the Digital Travel Credential Router.] *Addition from the EP. Presidency: merge with 88h.*
				[10. The technical specifications of the Digital Travel Credential Router shall be adopted in accordance with Article 16(1), point (a).] *Addition from the EP. The principle is ok for the Presidency, pending a decision on where to place it.*
Article 3a				
61c	Article 8 Establishment and operation of the EU Digital Travel application Moved reference text		Article ~~8~~**3d** Establishment and operation of the EU Digital Travel application	Article 3d Establishment and operation of the EU Digital Travel application
Article 3a(1)				
61d			**1.The European Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA) established by Regulation (EU) 2018/1726 of the**	1.The European Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA) established by Regulation (EU) 2018/1726 of the European

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			European Parliament and of the Council[1] shall be responsible for the development, operation, maintenance and hosting of the EU Digital Travel application. **1. Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), and amending Regulation (EC) No 1987/2006 and Council Decision 2007/533/JHA and repealing Regulation (EU) No 1077/2011 (OJ L 295, 21.11.2018, p. 99).**	Parliament and of the Council[1] shall be responsible for the development, operation, maintenance and hosting of the EU Digital Travel application. 1. Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), and amending Regulation (EC) No 1987/2006 and Council Decision 2007/533/JHA and repealing Regulation (EU) No 1077/2011 (OJ L 295, 21.11.2018, p. 99).
Article 3a(2)				
61e	1.eu-LISA shall develop the EU Digital Travel application and its components in accordance with the technical specifications adopted pursuant to Article 16(1), point (a). Moved reference text		~~1~~**2**. eu-LISA shall develop the EU Digital Travel application and its components in accordance with **this Regulation and** the technical specifications adopted pursuant to Article 16(1), point (a).	2.eu-LISA shall develop the EU Digital Travel application and its components in accordance with this Regulation and the technical specifications adopted pursuant to Article 16(1), point (a).
Article 3a(3)				
61f			**3.eu-LISA shall issue digital travel credentials in the format of electronic attestations of attributes as defined in the implementing acts of Regulation (EU) No 910/2014. Where necessary, Member States may introduce specific rules on the recognition and issuance of**	3.eu-LISA shall issue digital travel credentials in the format of ***[qualified]*** electronic attestations of attributes as defined in the implementing acts of Regulation (EU) No 910/2014. Where necessary, Member States ***[may]*** ~~*may*~~ introduce specific rules on the recognition and issuance of

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			digital travel credentials following the format of electronic attestations of attributes to European Digital Identity Wallets in national law, on the basis of the relevant ICAO technical specifications.	digital travel credentials following the format of ***[qualified]*** electronic attestations of attributes to European Digital Identity Wallets in national law, on the basis of the relevant ICAO technical specifications.
Article 3a(4)				
61g	2.The Programme Management Board referred to in Article 54 of Regulation (EU) 2019/817 shall ensure the adequate management of the development phase of the EU Digital Travel application. The Programme Management Board shall meet regularly and submit written reports every month to eu-LISA's Management Board on the progress of that phase. Moved reference text		~~24~~. ~~The~~**A** Programme Management Board ~~referred to in Article 54 of Regulation (EU) 2019/817~~ shall ensure the adequate management of the development phase of the EU Digital Travel application. The Programme Management Board shall meet regularly and submit written reports every month to eu-LISA's Management Board on the progress of that phase.	4.A Programme Management Board shall ensure the adequate management of the development phase of the EU Digital Travel application. The Programme Management Board shall meet regularly and submit written reports every month to eu-LISA's Management Board on the progress of that phase.
Article 3a(5)				
61h	3.eu-LISA shall ensure the operational management of the EU Digital Travel application as well as its adequate security. The EU Digital Travel application shall be hosted by eu-LISA. Moved reference text		~~3~~**5**. eu-LISA shall ensure the operational management of the EU Digital Travel application ~~as well as its adequate~~**, a high level of** security **and the technical capability for detecting any inappropriate, fraudulent or abnormal use**. The EU Digital Travel application shall be hosted by eu-LISA.	5.eu-LISA shall ensure the operational management of the EU Digital Travel application, a high level ***and state of the art*** ~~of~~ security and the technical capability for detecting any inappropriate, fraudulent or abnormal use. ***[***The EU Digital Travel application shall be hosted by eu-LISA.***]***
Article 3a(6)				

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61i	4.eu-LISA shall ensure that the EU Digital Travel application is interoperable with the European Digital Identity Wallet established under Regulation (EU) No 910/2014. Moved reference text		~~4.eu-LISA shall ensure that the EU Digital Travel application is interoperable with the European Digital Identity Wallet established under Regulation (EU) No 910/2014.~~	
Article 3a(7)				
61j	5.Where eu-LISA considers that the development of the EU Digital Travel application has been completed, it shall, without undue delay, conduct a test of the application in cooperation with the competent border authorities and other relevant Member States' authorities, in accordance with the technical specifications adopted pursuant to Article 16(1), point (c), and inform the Commission of the outcome of that test. Moved reference text		~~5~~7. Where eu-LISA considers that the development of the EU Digital Travel application has been completed, it shall~~, without undue delay,~~ conduct ~~a test~~**successive tests** of the application in cooperation with the competent ~~border~~ authorities ~~and other relevant Member States' authorities~~**using a multilevel test architecture**, in accordance with the technical specifications adopted pursuant to Article 16(1), point (c), and inform the Commission**, the European Parliament and the Council** of the outcome of **the tests. In the event that the results of the tests do not meet the requirements set out in the technical specifications, further tests shall be conducted as soon as eu-LISA considers that the necessary remedial steps have been taken**~~that test~~.	7.Where eu-LISA considers that the development of the EU Digital Travel application has been completed, it shall ***[no later than one year after the entry into force of this Regulation]*** conduct ***[***successive tests ***/ a test]*** of the application in cooperation with the competent authorities using a multilevel test architecture, in accordance with the technical specifications adopted pursuant to Article 16(1), point (c), and inform the Commission, the European Parliament and the Council of the outcome of ***[the test /*** ~~*the*~~ tests***]. [***~~.~~ In the event that the results of the tests do not meet the requirements set out in the technical specifications, further tests shall be conducted as soon as eu-LISA considers that the necessary remedial steps have been taken.***]***
Article 3a(8)				

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61k	6.eu-LISA shall collect statistics on the use of the EU Digital Travel application in accordance with Article 16(1), point (b). Moved reference text		~~68~~. eu-LISA shall **keep logs of all processing operations relating to the transmission of travel data and EES pre-enrolment data and** collect **and publish** statistics on the use of the EU Digital Travel application in accordance with Article 16(1), point (b). **The log data shall not include any personal data other than the information necessary to identify the relevant member of eu-LISA's staff who has accessed that log data. The statistics shall not include any personal data.**	8.eu-LISA shall keep logs of all processing operations relating to the transmission of travel data and EES pre-enrolment data and collect and publish statistics on the ~~use~~***number of users*** of the EU Digital Travel application***, for the sole purpose of evaluating the usability of the mobile application and the effectiveness of this Regulation,*** in accordance with Article 16(1), point (b). The log data shall not include any personal data other than the information necessary to identify the relevant member of eu-LISA's staff who has accessed that log data. The statistics shall not include any personal data.
Article 3a(9)				
61l	7.eu-LISA shall perform tasks related to provision of training of the competent national authorities on the technical use of the EU Digital Travel application. Moved reference text		~~79~~. eu-LISA shall perform tasks related to provision of training of the competent ~~national~~ authorities on the technical use of the EU Digital Travel application.	9.eu-LISA shall perform tasks related to ***the*** provision of training of the competent authorities on the technical use of the EU Digital Travel application.
Article 3a(10)				
61n				***10. eu-LISA shall ensure that the EU Digital Travel application does not transfer or disclose any information regarding its use, performance, or functioning to***

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				any third party, other than those provided for in this Regulation.
Article 3a(11)				
61o				***11. [Where the conditions set out in Article 35 of Regulation (EU) 2016/679 require that a data protection impact assessment be carried out, the competent border authorities referred to in Article 7(1) of this Regulation shall carry out that assessment before eu-LISA conducts the test referred to in paragraph 5.]*** *Addition from the EP*
Article 3a(12)				
61p				***12. [eu-LISA shall conduct a penetration test and vulnerability assessment of the EU Digital Travel application within two years after the start of operations of the EU Digital Travel application and every four years thereafter. It shall, in case of a change to the system architecture of the EU Digital Travel application, or a potential or actual breach of that application that could impact data protection, update the data protection impact assessment accordingly.]*** *Addition from the EP*

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