Dear Sir/Madam,

Regarding the **Regulation Impact Statement (RIS)**
and **Trusted Digital Identity Bill package**

Data security is not strong enough. Its hackable and also proposed to be held by a private company.

The system could be used as the start of creating a social credit score system like China and be linked to vax passports and medical and criminal records etc very easily.

the Australian Government may lack the expertise to steer a digital identity system with the necessary privacy and security protocols in place.

The Government should adopt a simple, existing standard for its digital ID system, such as the public-key infrastructure (PKI)-based system in use within many European countries. PKI offers

authority is involved in authentication, no entity can meaningfully track user activity.

There is no chance that an unqualified group of people who have not even specified their protocol in sufficient detail for it to be examined thoroughly, have invented something secure.

It's deeply significant that UK and US free markets have no commercially sustainable ongoing identity provider businesses, despite substantial public-private investment.

The DTA has overlooked international trends in identity, where the focus since 2013 has moved from authentication of *identity* to authentication of *attributes*.

'Identity' is too subjective, Wilson notes. We therefore need to focus on verifying objective pieces of information specific to each relationship, transaction, or context.

Government has also failed to embed effective cryptographic methods, such as Verifiable Credentials and FIDO protocol, into the model. That is despite many big-name companies embracing these security standards. Wilson surmises the Australian public service has become "allergic to public key technology" even though it was a world leader.

"The TDIF is a nice big document with a lot of rules, and accreditation is a good place to start. But the framework is still a hypothetical model.

"It's not going to lead us to a viable digital identity ecosystem or marketplace of identity services."

The jury is out on whether private entities, such as OCR Labs, can do a better job than governments of offering a privacy- and security-conscious as well as transparent digital ID

There is a risk, however, that the introduction of private businesses into the DTA-led digital identity system could expose security and privacy fault lines within the scheme.

Yours faithfully ████████████████