Contract Number 235542

RACE networkRFID

ICT-PSP: a European concerted effort on RFID

D.1.2.3 – Annual Report on Policy Progress

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Start date of project: March 1st, 2009 Duration: 36 months
Version: 1

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Project co-funded by the European Commission		
Dissemination Level		
PU	Public	
PP	Restricted to other programme participants (including the Commission Services)	
RE	Restricted to a group specified by the consortium (including the Commission Services)	
CO	Confidential, only for members of the consortium (including the Commission Services)	**CO**

High level Objectives

Working Package 1 high level objectives are twofold:

- **Identifying policy barriers to the adoption** of RFID technology and in particular for Small and Medium Enterprises in Europe and strive to overcome them through the support of **seamless policy implementation** measures.

- **Working towards avoidance of unjustified policy fragmentation** of the internal market that would result in barriers to implementation.

Working Approach

Main targets of WPI working approach are to:

- focus on tools (from a policy perspective) for easy, operational and at the same time privacy friendly RFID adoption in Europe
- select policies areas where RFID can be an enabler: eg food safety, sustainability
- share experiences and regulatory views
- broaden policy dialogue and exchange to stakeholders within and outside the Network.

Participation

- 12 members in the mailing list

During the second year of the project, WPI has mainly communicated via email to provide updates to the group and the extended network.

WP1 activities 2010-2011

- The second year of activities of WPI at RACE Network RFID centered around the development of the **Privacy Impact Assessment Framework** by the industry following the publication of the European Commission Recommendation on Privacy and Data Protection Aspects of Radio Frequency Identification (RFID) in 2009. This tool will be essential for the spread out of RFID applications in line with data protection principles and regulation in Europe. This document has been endorsed by Article 29 Working Party on 11 February 2011 and should be endorsed by the European Commission in April.

- WPI has provided **timely policy updates** with particular emphasis on linking policy with business deployment angles.

- Finally, WPI has raised **awareness of RACE Network RFID externally** to policy makers.

Privacy Impact Assessment Framework

Background

Following the 2007 European Commission's *Communication on RFID in Europe: Steps towards a policy Framework,* an RFID Expert Group was created to initiate dialogue and share experiences between stakeholders on RFID. The outcomes of this expert group led to the publication in May 2009 of a Recommendation on data protection for RFID applications: In this text, it is agreed that consumers should be informed of the presence of tags and readers, and that operators should undergo a **Privacy Impact Assessment** to evaluate their RFID applications toward European Legislation. Industry representatives are in charge of developing a Privacy Impact Assessment Framework.

The PIA Framework is of great relevance, especially as it provides a basis to conduct a Privacy Impact Assessment when RFID applications in direct contact with the consumers are spreading out and will continue to develop.

What is a PIA Framework for RFID Applications?

The PIA Framework is designed to help RFID Application Operators uncover the privacy risks associated with an RFID Application. It identifies the objectives of RFID Application PIAs, the components of RFID Applications to be considered during PIAs, the process for conducting a PIA and the common structure and content of RFID Application PIA Reports

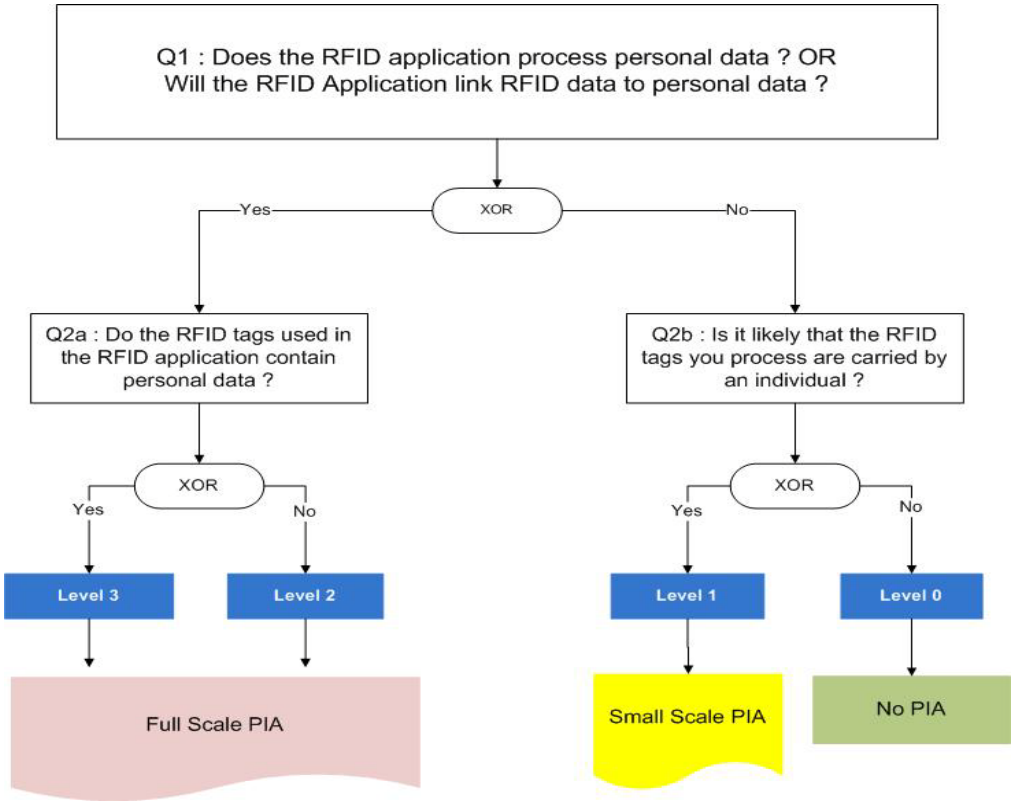
The PIA Framework is based on a privacy and data protection risk management approach and categorises PIA levels (see Graphics below)

The PIA Framework has been published on the European Commission's website at
http://ec.europa.eu/information_society/policy/rfid/index_en.htm

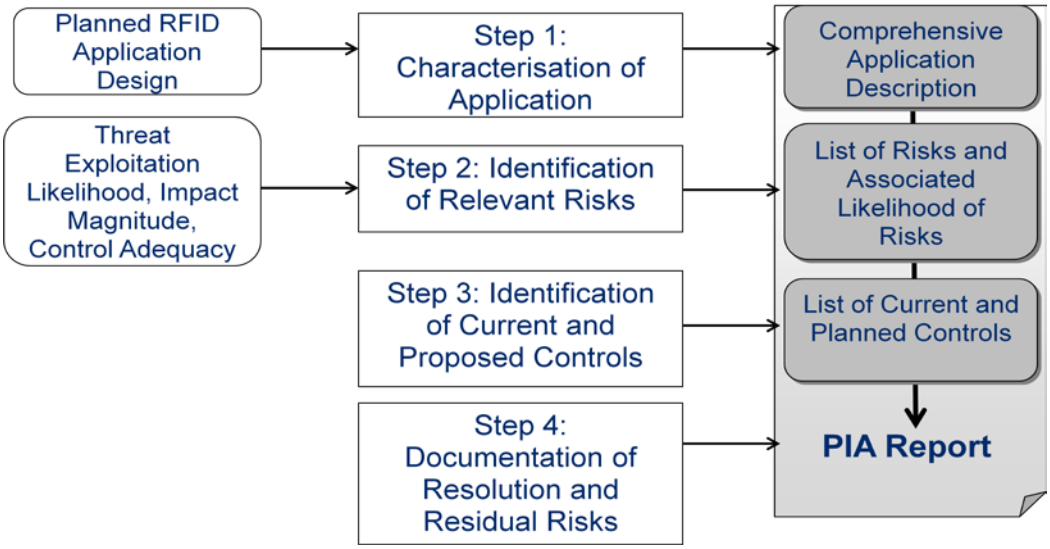
PIA Framework Status (March 2011)

- The PIA Framework was formally endorsed by the Article 29 Working Party on 11 February 2011
- Formal endorsement by the European Commission is expected on 6 April 2011 at the occasion of a signing ceremony.
- From the date of the official endorsement by the Article 29 WP, industry has 6 months to implement the tool for their new applications.
- To facilitate this process, PIA templates will be made available to operators to easily evaluate their applications

Decision Tree on PIA levels



Risk Assessment Phase: Characterisation of applications



Public Policy Updates

In addition to the work on the Privacy Impact Assessment Framework, the Work Package provided four quarterly updates throughout the year informing the network of any relevant issues discussed by policy makers and stakeholders at the European level. These updates were meant to disseminate up to date policy information that will be used in the ongoing implementation of the rest of the WP deliverables. They also bring together public policy related activities of RACE NetworkRFID and address EU policies, where appropriate national initiatives in the EU and linkage to non EU policy developments for relevance to RACE NetworkRFID.

Events

The following information relates to participation of RACE network RFID relating to WP I actions and activities.

March 24-25 2010	RACE Network RFID Management Board and General Assembly
October 19-21 2011	RACE Network RFID Management Board and General Assembly
March 28-31 2011	RACE Network RFID/RFID in Europe conference and General Assembly