

## MISSION REPORT

Visit of eu-LISA/COM/Frontex/MS to CBP and OBIM, in Washington DC  
June 6 - 7, 2022

**Abbreviations:**

**Names:** full name when first used; thereafter initials

**FI:** Facial Images

**FP:** Fingerprints

**Q:** question

**FX:** Frontex

Author: [REDACTED] (Frontex)

**U.S. Customs and Border Protection**  
Washington, D.C.  
June 6, 2022

**PARTICIPANTS**

**United States:**

[REDACTED]

**EU:**

Krum Garkov                      Executive Director of eu-LISA

[REDACTED]

- Welcome Remarks and Introductions

Opening statements: CBP can relate to the operational differences at national/state/port-level and the difficulties to implement a common approach. Technology part is just one piece of the puzzle.

- eu-LISA Overview on European Travel Systems (ETIAS)

Eu-LISA Krum Garkov (KG) gives an overview of IO and the new CBSs. Stresses that integrating all information at the border is the future and that the silo-approach is outdated. [REDACTED]

██████████ KG also stresses that the operational part is the most challenging, not the technology. Mentions the difficulties CBP had with regards to integration of ESTA with the carriers and that EU is currently facing the same problems. KG states that the private sector may also not always be able to service the needs of the public sector in the field of security. Mentions that IO will be the biggest platform for biometric data globally for border security after completion of this exercise. Hoping to learn from the experience of US in this field. KG mentions that especially interested in the US pilot at Mexican land border.

██████████ introduces the purpose of ETIAS, the role of MS and FX as well. The link with national databases and IO. General introduction to ETIAS. KG mentions that there are also spinoffs from this process, "collateral benefits".

CBP mentions there were issues with privacy advocacy groups in the past especially in the field of biometric data collection and asks whether EU is facing similar problems. KG replies that the EUDPR/GDPR contain strict rules and require EDPS supervision. Example: even using real biometric data for accuracy testing of the matching algorithm is a challenge. ██████████ adds that the initial approach was based on a pilot where biometrics were used as an identifier and that the public noticed it is simply a more convenient way of travelling. ██████████ adds the privacy by design and by default. ██████████ adds that EUDPR/GDPR require a specific legal basis for processing personal data and echoes the statement by KG that the biggest challenge is the implementation from the business-side and the need for proper business analysis to reflect the business needs in the technology.

- Biometrics and Entry/Exit Discussion  
*Presentation by ██████████*

CBP ██████████ Initially the technology was not available when Congress provided the mandate. Later-on discovered that FI is easier than FP to verify and collect, also considered less intrusive by travellers FP than and goes faster. Iris-scan is e.g. much more expensive.

Procurement of the hardware was very difficult, and the tender documentation was technology agnostic, just defining the specs. ██████████

██████████  
██████████  
██████████

CBP was accused of taking images from social media. This is not correct. ██████████  
██████████ The FI is considered to be the identity token.  
██████████ adds that there are also privacy impact assessments as in EU.

██████████  
██████████  
██████████

[REDACTED]  
[REDACTED] Newest technology can even work accurately with a face mask.

Stressing the need of being technology agnostic. TSA is working with [REDACTED] but this is irrelevant. Phase 3 of border management: block-chain concept from the moment you register until you get on the plane, so each step confirms the other one.

Process: checking in, ... until on the plane (every time verified against CBP DB); passenger can opt-out, but then need to go through a more time-consuming process. Now looking into mobile checking, authentication via the phone.

Importance of openly communicating with the public: keeping them informed about the process.

[REDACTED]  
[REDACTED]

[REDACTED] interested in the [REDACTED] in the EU.

[REDACTED] Information campaign to use a mobile app to cross the land border via the "trusted traveller" programme at land border.

Now looking into ESTA as well. Exit records are biographic, not biometric. Now DHS is tasked to come up with a biometric entry- and exit system. So currently, exit is recorded, but with less confidence than with biometric.

Partnerships with the airlines are voluntary; they are free to join the biometric verification programme. It is going slow to allow the partners to adapt. Also, for the traveler the process is completely voluntary, apart from the exit and entry itself. The online check in etc. are all voluntary. Participation by US citizens is purely voluntary because CBP has no authority to collect biometric data about them. So, the incentive is to speed up the process.

[REDACTED]  
[REDACTED]

- Presentation on Land Border Pilot

[REDACTED]

Challenges at the land border: visa images do not follow any specific requirements, [REDACTED]

[REDACTED]

KG: what was done to improve the BCPs to facilitate the process? Technology to perform inside a bus, cargo vehicles are easier. No general rules but need to check every BCP individually.

[REDACTED]

[REDACTED]  
[REDACTED]

Eu-LISA mentions the FX pilot under controlled conditions, e.g. to accommodate religious sensitivities.

Eu-LISA question: what happens when a false match discovered? What is the procedure? BCP adjusts the algorithm along the way. Special team of experts to feed the errors back into the algorithm to make sure the algorithm improves itself. Of course, the different releases of the algorithm are tested before becoming operational. [REDACTED]  
[REDACTED]

- General Privacy/Ai Group Discussion

KG: eu-LISA will grow into a centre of excellence for AI in the coming years. To be continued in a next working session.

[REDACTED]  
[REDACTED]

KG mentions also the use of anonymised AI in the screening rules and the use of chatbots.

Also security needs to be taken discussed and studied further next time.

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**Department of Homeland Security**  
Washington, D.C. – Office of Biometric Identity Management  
June 7, 2022

**PARTICIPANTS**

**United States:**

[REDACTED]

**Europe:**

*ibid.*

- General:

OBIM: takes the role of data steward, not owning the data but manage, secure analyse on behalf of the owner of the data. Not a decision making body, but a body providing advice and expertise.

[REDACTED] explains IO, especially CRRS, ETIAS, ESP, CIR, MID; [REDACTED] explains sBMS.

Q OBIM: shared platform separated virtually or separate systems.

Eu-LISA: both physical and virtual separation. For law enforcement data there will implement physical separation because of the legal basis; for the other data there is virtual separation. But at infrastructure-level, always using the same standards and network.

Q OBIM: person-centric? E.g. DHS has all info, but cannot give all info to all entities, but can tell you a certain entity, e.g. FBI has info, but not what. Eu-LISA: same for us.

[REDACTED]

Q OBIM how many transactions per day? [REDACTED]

Q OBIM: what is the unique identifier? Eu-LISA for biometric data it is the biometric template. But not all systems are biometrics-based.

- Contractual questions:

Q eu-LISA: how to ensure good quality, while keeping the tender open for different types of competitors?

OBIM: for the past 28 years the same algorithm vendor for FP comparison. They have, however, the possibility to test other solutions in house. Working with NIST for FI standards. [REDACTED]

[REDACTED] Some algorithms may also work better with different populations, e.g. children and adults different algorithms. OBIM had a problem with the fact that NIST was using only a very limited dataset (1 mio) of high-quality images (mugshots etc.), so they provided airport images etc. of poorer quality. There are differences in algorithm accuracy based on quality of the images, race, gender etc.

Need to build in flexibility: so trying to keep the options open, no big bang to end up in vendor-lock in. Start with pilots of low value to see what works.

Accuracy measures in the contract; there is no possibility to do live accuracy measures; still need to take the system offline for accuracy measurements. Eu-LISA: there are legal requirements for accuracy measures. Asks for sharing the lessons-learned with EU.

OBIM: working on GUI to tailor access rights on a real-time basis.

Eu-LISA: how to ensure data quality? How to build it into the processes? OBIM: in general need to comply with the defined XML-standard. A lot of the data is free text. No minimum quality score for DHS, like the FBI does. Consequently, OBIM deals with sometimes very poor quality images. So this is why you have manual FP examiners.

Eu-LISA: Process to update the FIs? OBIM is looking into it.

[REDACTED]  
[REDACTED]  
[REDACTED] Looking onto the creation of a lab environment controlled by eu-LISA.

FX questions:

- Does OBIM outsource biometric image comparison (live prints) (FP)?

OBIM: Most of the day-to-day activities are managed by private service providers. Current ones and tender specifications will be shared by OBIM (Comment: already done 12/06/2022).

- Does OBIM provide their own training or does it outsource the training?

OBIM: Currently, there is no internal training. The vendors are expected to train their own staff.

- Testing the biometric verifiers?

Given that they are outsourced, this is on the vendor. However, Australia uses the "Glasgow test". OBIM will facilitate contacts between FX and Australia , also for training, as Australia provides their own training.

- Questions regarding stakeholder management:

OBIM has a dedicated stakeholder management team, including for data protection.

Change management in OBIM: prioritize the requirements of the different stakeholders. In the end the business owner decides. Escalation to director in case of political implications.



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**Delegation of the European Union to the United States**  
June 7, 2022

**PARTICIPANTS**

**EU27 Representatives:**

Several MS; BEL and FRA asked questions.

**Delegation:**

*Ibid.*

General overview of IO and the SoP of the different large-scale IT-systems, linking also with the UKR crisis. Eu-LISA namely developed a system to process all the asylum seekers entering the EU.

FRA asked about the relation between SIS and IO. Eu-LISA clarified that SIS will make use of sBMS.

No major discussions or finding otherwise.