



GMS Flash Alert

Immigration Edition

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European Union – COVID-19 Digital Certificate

The European Commission (EC) proposed¹ to create a COVID-19 digital certificate² to facilitate free movement within the EU in March 2021. Formal approval of this proposal is expected to conclude during June 2021 and the COVID-19 digital certificate is set to be applied from 1 July 2021.³ All nationals residing within the EU will be eligible for the COVID-19 digital certificate.

Several EU countries⁴ have already made an app available for COVID-19 digital certificates.

WHY THIS MATTERS

The COVID-19 digital certificate proves that a person has been vaccinated against COVID-19, received a negative test result, or recovered from COVID-19. Although national requirements⁵ for entering an EU country will remain, the digital COVID-19 certificate will make travelling easier. For example, the certificate could mean that you do not have to quarantine or get tested upon arrival or repeatedly.

The certificate will be valid in all EU countries as well as Iceland and Liechtenstein. Switzerland and Norway are currently in a test phase and the certificate is also expected to apply in these countries.

About COVID-19 Digital Certificate

The COVID-19 digital certificate is a temporary measure set to be suspended within 12 months from 1 July 2021, or once the World Health Organisation (WHO) declares the end of the COVID-19 international health emergency.

The COVID-19 digital certificate will be issued by national authorities and in the official language(s) of the issuing country and English. The information will take the form of a QR code which can be presented digitally on a phone or a tablet or printed on paper.

The COVID-19 digital certificate includes information about an individual's:

- Vaccination against COVID-19;
- Test result for COVID-19;
- Recovery from COVID-19

Vaccination against COVID-19

The COVID-19 digital certificate is issued to all who have been fully vaccinated against COVID-19 with one of the vaccines approved by the European Medicine Agency (EMA).

The certificate proves that its holder is vaccinated while also containing information about the vaccine, including dates for the administration of the vaccine, manufacturer, etc.

Each EU member state can decide to include vaccines that are not approved by EMA.

Test Result for COVID-19

Negative test results recognised under the COVID-19 digital certificate include the Nucleic Acid Amplification Test (NAAT), such as the RT-PCR test and rapid antigen test. Antibody testing is not included in the certificate, but this may change.

There is no common timeframe in the EU within which the test must be taken and for that reason it is important to observe requirements in each country. Generally, a test taken within 48 hours from entering a country is accepted by most EU member states.

Recovery from COVID-19

Travellers who have recently been infected with COVID-19 and recovered from it are eligible for the COVID-19 digital certificate. However, the certificate should not be issued before at least 11 days have passed since the positive test.

The antibody tests that detect if a person has developed antibodies against COVID-19 cannot be used as a certificate yet.

COVID-19 Digital Certificate

The certificate will contain information on the holder's name, date of birth, the EU member state issuing the certificate, and QR code.

For vaccinated travellers, the additional information includes the names of the vaccine and manufacturer and dates and numbers of administered doses. For tested travellers, the certificate includes information about the type of test, date and time of test, result, and the name of the test centre. Finally, the travellers who have recovered from the virus will be able to display the date of the positive test result, date of issuance, validity date, and the name of the issuer of the certificate.

It should be noted that each country determines its own travel restrictions, so the question of whether only one vaccination is sufficient is up to each country to decide, as well as the timeframe for the negative test results.

KPMG NOTE

The EU encourages the member states to include vaccines not yet approved by EMA in the certificate as well as nationals residing in the EU, but who have been vaccinated in another country, including third countries. This is, however, something that each EU member state will decide for themselves.

A Look at Hand-Held Device Version of COVID-19 Digital Certificate



Source: European Commission "EU Digital COVID Certificate Factsheet"
(https://ec.europa.eu/commission/presscorner/detail/en/FS_21_2793)

The European Parliament has published a short video⁶ explaining the usage of the COVID- 19 digital certificate.

Data Security

The QR code is verified without processing data. The certificate itself contains information such as name, date of birth, etc., but this is not seen when the QR code is being verified and data is not stored in other countries. The valid digital signature is the only thing that will be checked with scanning of the QR code.

The EU is not producing an app for the COVID-19 digital certificate. The EU is producing a digital gateway where countries can validate the QR code. Each country produces its own app.

KPMG NOTE

Employers should make their employees residing in the EU aware of the COVID-19 digital certificate and encourage them to download the app and use it to make their intra-EU movements easier. The certificate is free of charge and it can reduce restrictions for travellers, such as quarantine and testing.

The certificate does not require a person to be vaccinated, as it also stores information about testing and recovery from COVID-19.

The introduction of this certificate is a temporary measure to help restore freedom of travel in the EU, so it should be utilised where relevant.

The EU has asked the member states to refrain from imposing additional restrictions on holders of the COVID-19 digital certificate unless it is necessary for public health, e.g., if a new variant of the virus causes a concern. Any member state that would wish to impose new restrictions on holders of the certificate must justify such decision to the EU.

FOOTNOTES:

1 European Commission, [*Proposal for a Regulation of the EU Parliament and Council on a framework for the issuance, verification and acceptance of interoperable certificates on vaccination, testing and recovery to facilitate free movement during the COVID-19 pandemic*](#) (17 March 2021).

2 The COVID-19 digital certificate is sometimes referred to as the "COVID-19 passport" or "Digital Green Pass." All these names refer to the same thing.

3 For the status, see the EU newsroom ("EU Clears Way for the EU Digital COVID Certificate") at: https://europa.eu/newsroom/content/lue-ouvre-la-voie-au-certificat-covid-num%C3%A9rique-de-lue_en .

4 As of 16 June 2021, the following countries are currently issuing and using COVID- 19 digital certificates: Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Germany, Greece, Latvia, Lithuania, Luxembourg, Poland, Portugal, Spain, and Iceland. (For related coverage about Germany, see [*GMS Flash Alert 2021-181*](#), 23 June 2021.)

5 European Union, [*Re-open EU*](#) is a central website that contains information about COVID-19 measures for travellers in each EU member state. Information is updated constantly.

6 European Parliament, video [*Travel Safely with the EU Digital Covid Certificate*](#) (4 June 2021). (Note, a choice of language subtext is possible by pressing a globe icon at the bottom of the video.)

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Contact us

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