

INTERNATIONAL
AND COMPARATIVE
LAW RESEARCH CENTER

CROSS-BORDER RECOGNITION OF IDENTITY MANAGEMENT AND TRUST SERVICES IN EURASIAN REGION

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REGIONAL APPROACHES TO RECOGNITION OF FOREIGN CERTIFICATES AND TRUST SERVICES

European Union

eIDAS 2014: ex-ante recognition, international agreement required

Eurasian Economic Union

Introduction of Transborder Trusted Environment (mainly for G2G)

Russia

E-Signatures law 2011:
recent change of approach (2019)

Before: comparative levels of reliability

Now: international agreement OR the trusted third party (TTP)

Kazakhstan

Digital Code 2026: TTP only

Kyrgyzstan

Digital Code 2025: TTP OR trust services list (including ex post recognition)

China

E-Signature law 2004:
ex ante recognition by the competent authority

Data Security Law 2021:
requirements for all kinds of data technologies



REGULATORY CROSSROADS FOR THE GOVERNMENTS OF THE REGION

Public vs. Private origin

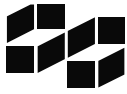
- Unification and standardization in course of e-gov
- Variety of private services and platforms for data exchange

Electronic vs. Digital

- Backward compatibility for electronic and paper documents
- Digital transformation in public and private sector

Open vs. Closed systems

- Trusted third party as an attempt to scale inherited PKI architecture
- Growth of non-PKI extraterritorial trust networks within digital platforms, ecosystems and multinational companies



LESSONS LEARNED

- Non-feasibility of fully open approach to recognition of foreign trust services
- Introduction of MLIT-like approach for ex ante and ex post recognition of trust services (through trusted services lists or trusted third parties)
- Desirability of multilateral agreements on interoperable trust frameworks, including both formal and content requirements