The 2016 amendments to Convention No. 185: challenges and progress made
History of Convention No. 185

- Adopted in 2003 to replace Convention No. 108 with a modern, uniform identity document including biometrics
- Diverged from ICAO Doc 9303 for passports when ICAO moved to ePassport with chip in 2006
- Verification of fingerprints contained in a two dimensional barcode was difficult at borders and ports as required equipment was typically not available
- Ratification was slow, but implementation slower still
- In 2015 and 2016, tripartite maritime meetings held in consultation with ICAO to recommend amendments
- Governing Body approved amendments in March, 2016
- ILC adopted amendments in June, 2016
- Amendments came into force June, 2017
Summary of Amendments

- Convention No. 185 references Doc 9303 seventh edition “as it may subsequently be amended in accordance with the related procedures of ICAO”. Can no longer lose coordination with ICAO
- SID can be of TD1, TD2 or TD3 size (passport page, credit card or visa sticker)
- Barcode and fingerprints removed
- Biometric is now facial image in contactless chip
- Logical Data Structure (LDS) in eSID works exactly like that of an ePassport and can be read by all ePassport readers
- All border points should now support verification of eSID
- BUT….. Distribution of keys to verify digital signature in chip is a new critical element required for success
Progress on C185

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<thead>
<tr>
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<th>C108</th>
<th>C185</th>
<th>C185 Amendments</th>
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<tbody>
<tr>
<td></td>
<td>No Biometric, Low</td>
<td>Fingerprints, MRZ, Better</td>
<td>Face Recognition</td>
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<td></td>
<td>Security</td>
<td>Security</td>
<td>MRZ + Chip High Security</td>
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<td>Ratified</td>
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<tr>
<td>Must Issue eSID</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
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<tr>
<td>Must Accept eSID</td>
<td>Yes</td>
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98 countries are bound to accept the eSID but only 34 to issue it
Progress on C185 Amendments

- A transition period for the amendments to C185 was offered, but only one country, Marshall Islands, has opted against immediate entry into force.
- This means issuance of eSIDs is an immediate obligation for 33 countries (plus Myanmar in July, 2018).
- ICAO agrees that C185 and ICAO Doc 9303 are now completely aligned.
- Any border that supports an ePassport can also support an eSID.
- Some countries have already begun to implement.
Challenges for C185 Amendments

• Expertise on electronic travel documents is usually found with passport issuers and not maritime authorities
• Use of an eSID following ICAO Doc 9303 requires distribution of keys so that the eSID can be verified at the border
• This greatly increases usability but also increases complexity and cost
• Cooperation with passport issuing departments is the simplest route, but not always possible
• How does the eSID issuer tackle this problem?
Problem of Key Distribution

- ICAO PKD can be available even if your country doesn’t currently issue an ePassport
- ICAO will offer advice in their presentation
- With cooperation of another friendly country, keys can be distributed to the PKD using a master list
- Currently less than half of ePassport issuing countries are actually members of the ICAO PKD
- Companies with expertise in ePassport issuance may have suggestions on how to arrange key distribution
Problem of Cost and Complexity

- Companies with suitable expertise can help with the complexity (three companies are outside, all have provided eSIDs whose physical designs have been checked for compliance with C185)
- Since fingerprints have been replaced with facial recognition, enrolment is easier
- Sharing resources and facilities between departments (ePassport and eSID) or between countries (cards can be printed and personalized remotely) can save a lot
- Make ILO Checklist part of your procurement (ensures that SID will be compliant to C185)
- Ask ILO for technical help
- Dr. Campbell will be available all day Thursday
Summary

• C185 Amendments define a secure eSID that is compatible with ePassports
• Enrolment of seafarers is easier
• Acceptance at border is better
• Costs and complexity are higher, but can be reduced by sharing resources
• Follow ILO SID Checklist, use a reliable company, and get it right the first time