

Open letter to the Alþingi regarding passport contractor fraud against the Icelandic state

Speaker Sveinbjarnardóttir, Deputy Speaker Haraldsdóttir, Prime Minister Frostadóttir:

I approach the Alþingi today with the following report regarding a contractor in service to the Icelandic state for both its passport and ID cards.

First, let me introduce myself, I am James Moyer. I am a Berlin (Germany) based artist, writer and advocate in the public interest. In regards to advocacy, I have written a book about American elections and I also write about data protection in regards to ID cards, passports and biometric systems.

Back in 2018 I began a conversation with (what was then) Ríkiskaup about XXXXX LTD, a key contractor for the Icelandic passport (and now, as I've understood it, a contractor for Icelandic ID cards as well.)

In compliance with EC 2252/2004, the Icelandic passport encodes the fingerprints of citizens in the electronic chip for the purposes of secondary authentication.

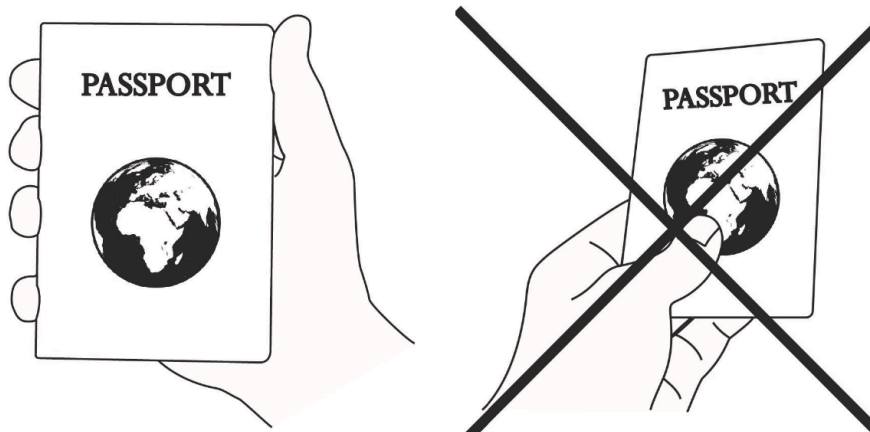
The passport contractor was involved in a behavior I find problematic: while it was under contract to Iceland for its passport, it was also under contract to a third country¹ for an immigration entry/exit system which records visitors' fingerprints.

It is worth discussing the problems with the EC 2252/2004 fingerprinting requirement.

The uselessness of the passport fingerprinting is well known to European policymakers. It has never been used at a Schengen border, it's a technological experiment that has gone nowhere. It is difficult to use and ultimately it makes no sense because a person's fingerprints are left naturally on the passport through natural handling, making it unsuitable for use as a secondary authenticator.

If Schengen states stopped collecting fingerprints for EU/EEA passports tomorrow it would change nothing.² This is proven by countries which do not encode fingerprints in the passport chip and have no plans to do so.³

It is not clear why European citizens are still being forced to endure the indignity, inconvenience and costs of the passport fingerprint biometric collection other than stopping would be an embarrassment.⁴



Security Warning: Hold passport by edges to prevent fingerprint transfer

Fig 1: If the fingerprint biometric as a secondary identifier were to make any sense, it would require a warning in the passport or on its exterior reminding passport holders not to transfer their fingerprints inadvertently onto the document.

Nevertheless, the passport contract vendor is under contract to the Icelandic state to secure the technology for its intended purpose and the biometrics that go along with that technology.

It is a conflict of interest/default on the contract/contractual fraud for the same company to collect fingerprints from Icelanders for a third country.

I use the analogy of a locksmith, hired for the purpose of putting locks on a house, and then copying the same house keys for someone else.

This is an enormous conflict of interest and breach of trust. XXXXX is under contract to Iceland to protect the security of the Icelandic passport. Part of that security model is the fingerprint in the chip. The fingerprint is a key for the Icelandic passport. At the same time that XXXXX is under contract to protect that key, they are copying that key for others.

XXXXX is part of a team of locksmiths who create a key-lock combination (the key being the fingerprint, the lock being the passport and its chip.) XXXXX is copying the keys for others in spite of being the locksmith under contract for Iceland.

Iceland cannot prevent other countries from copying the keys. Nor can it stop other locksmiths from helping other countries to copy the keys. But for Iceland's *own* locksmith to help others copy the keys is contract fraud.

Much of this locksmith analogy is built around key copying, because the biometric used is the same.

But it need not involve the same biometric: XXXXX's primary obligation under the passport contract is the protection of Icelandic citizen identities. It fails to do so when it collects Icelandic citizen biometrics for a third country which neither the citizen nor the Icelandic state have any control over.

I had first reported this matter to (what was then) Ríkiskaup in 2018. At the time Ríkiskaup genuinely seemed concerned, but referred me to Þjóðskrá.

Þjóðskrá told me, in effect, "that's what biometrics are for."

I think that response is wrong and is emblematic of the problems with the European Union's self-contradictory biometrics policy, the result of which is that European institutions are unable or unwilling to protect European citizen's biometrics.⁵

Biometrics are either elements of our identities which have to be secured, or they are un-securable and therefore can't be elements of our identities.

As a result of Þjóðskrá's indifference⁶, I attempted to file a fraud charge with Lögreglan in 2021.

These attempts were not successful.

I don't blame Lögreglan for not wanting to accept the report, I think they likely saw this as a political problem. And that is why I approach the Alþingi today.

The people of Iceland are being taken advantage of by their own passport contractor. I am certain that citizens of other European countries are being similarly taken advantage of by their countries passport and biometrics vendors.

The industry doesn't care about the security of European citizen biometrics. They are mercenaries. That is proven by these conflicts of interest.

The reason why people are being taken advantage of is because they put too much trust in the passport and biometrics industry. If they stop trusting these companies

and the institutions which have forced them to submit their biometrics, they will stop being taken advantage of.

A key issue here is that European policymakers have bought into a package of “security solutions” which are inherently contradictory to each other and make no sense except for the companies which sell biometrics systems.

European policymakers have to decide if it’s more important to protect European citizen biometrics or capture third country citizen biometrics, they can’t rationally do both.⁷

I have argued to the European Commission and the Council that its current policy decision is the abandonment of the security of European citizen biometrics.

With this being the case, I feel the obligation to expose it for the farce that it is.

I made the decision in 2018 that I would not sit by and watch the people of Iceland be taken advantage of.

In that regard, this is a difficult document for me, because if this parliamentary body is to take this document as seriously as it should, it is not obvious what solutions are immediately available to the Icelandic state, other than to drop its current passport and ID contractor and/or pursue damages against it.

I don’t know whom you should switch to instead of XXXXX, because I believe that many of the major contractors have the same conflict of interest/indifference to protecting citizen identities.⁸

Nevertheless I find this state of affairs an intolerable breach of trust against the people of Iceland. You are paying this company for its services, it should be working for the people of Iceland, as opposed to working against them.

Warm regards,

J. Moyer
Berlin, October 2025
<http://jmoyer.space>

¹ For the purposes of a public document to the Alþingi I don’t name the third country.

² Except make the passports cheaper and easier to issue, particularly renewal passports which could be processed by mail.

³These include the USA, UK, Ireland, Australia, Canada, New Zealand and Japan.

⁴ And in that regard, I have enormous concerns with the passport contractors, who are accepting money for this technology, even though they should know at this point the technology has no rational use. If the passport vendors were actually serious about security, they would not knowingly sell and accept money for technology that has no security value. European law does not require the vendors to sell a product they know to be pointless.

⁵ As a courtesy to EU institutions, before submitting this letter to the Alþingi, I contacted the European Commission and the Council to see if they had any objections to this report. The Commission did not say anything of consequence, and the Council did not respond.

⁶ I don't criticise Þjóðskrá. I don't believe that Þjóðskrá has a biometrics' policy independent of the EU, whose own biometrics policy is not independent of the ID and biometrics industry. This biometrics policy is not built for security, but for the maximising of systems installations and biometric processing events.

At the same time, it would seem that Þjóðskrá has some meaningful obligation to protect Icelandic citizen biometrics.

⁷ The concept of Digital Sovereignty demands that European policymakers ultimately adopt a policy of protecting European citizen biometrics globally.

⁸ Though I could see the possibility that an arrangement could be made where whereby XXXXX would not process Icelandic biometrics for any third country. In a variation of this idea, I have argued that the EU needs to establish bilateral treaties with third countries in which they agree not to capture each others citizens' biometrics.