

29 March 2022

David Beath

By email: fyi-request-18728-eb27128c@requests.fyi.org.nz
Ref: H202203383

Tēnā koe David

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health (the Ministry) on 1 March 2022, for information regarding New Zealand's digital COVID-19 certificate, My Vaccine Pass (MVP). I will respond to each part of your request in turn.

Whether or not the NZ "My Vaccine Pass" Digital Covid Certificate that is used within NZ conforms to the EU DCC standard

MVP is New Zealand's domestic Digital COVID-19 Certificate (DCC). This does not conform to the European Union (EU) DCC requirements.

Please note that New Zealand is part of the EU DCC system and New Zealand's International Certificate is accepted in the EU. EU DCCs are also accepted at the New Zealand border.

Whether Digital Covid Certificates granted using the EU DCC standard overseas are recognised as valid by the official "NZ Pass Verifier" scanner application.

No, international EU DCCs are not recognised as valid by the New Zealand Vaccine Pass Verifier.

If EU DCC standard overseas Digital Covid Certificates are not recognised as valid within NZ, then can you please provide all relevant information regarding the decision as to why the "NZ Pass Verifier" does not recognise the EU DCC standard.

Information within scope of this part of your request is itemised in Appendix 1 of this letter and copies of the documents are enclosed. The table in Appendix 1 outlines the grounds under which I have decided to withhold information. Where information is withheld under section 9 of the Act, I have considered the countervailing public interest in release in making this decision and consider that it does not outweigh the need to withhold at this time.

To summarise, when considering requirements for a domestic solution and reusing the EU DCC, the following considerations were made:

- The EU DCC is intended to provide verification of a vaccination event. It includes information about the vaccine products, date of vaccination, and number of doses given. The EU DCC enables different verifiers to apply their own rules about what it means for someone to "be vaccinated". This is necessary as the EU DCC is used by many different countries with different vaccination requirements.

- The advice from the Office of the Privacy Commissioner (OPC) was that a domestic solution should only contain the minimum data set necessary to ascertain that someone is considered vaccinated. OPC also advised that the solution should not disclose if a person is medically exempt from vaccination, so people are not discriminated against if they have a legitimate medical exemption. This is not currently possible within the EU DCC specification.
- It is not possible to customise the EU DCC data model for domestic use, therefore, limiting the ability to add support for different use cases, for example, a combined proof of a negative test and vaccination in a single certificate.
- In a domestic setting, the Ministry sets the rules for when someone is considered vaccinated or exempt. This means the benefit of including details about the vaccinations received is reduced, as verifiers don't need that information to make a decision.
- In New Zealand, the rules for whether someone is considered vaccinated are very complex, particularly for people with mixed doses administered overseas and/or when they have received vaccinations that are not Medsafe approved. As there are more verifier apps than just the NZ Pass Verifier, maintaining these rules in multiple places adds a risk, that people are refused entry based on incorrect implementations. A single pass which represents all these scenarios simplifies this considerably.
- EUDCCs are signed by the New Zealand Country Signing Certificate Authority, which is operated on similar hardware to that used for ePassports. This comes at a non-trivial cost per signing operation, was assessed as prohibitive for domestic use, especially when factoring in passes issued for negative test results in a domestic setting.

In this case, I also ask that the MoH provide information as to when implementation of the reciprocity agreement is planned, so that travellers from overseas will be able to use their existing EU DCC certificates within NZ.

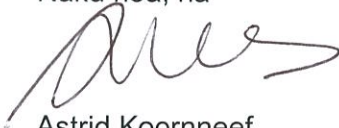
Travellers from overseas are already able to use the EU DCC when they arrive at the New Zealand border. There are no plans to make MVP EU DCC compliant, as MVP was designed to keep the privacy risk to a minimum. The EU DCC provides far more health information than is available in MVP when it is verified. As many organisations participate in the verification process, this removes the risk of this health information being retained or misused.

Please note that people who have received their vaccinations overseas are able to request a MVP for domestic use in New Zealand at: www.overseas-vaccination.covid19.health.nz/.

I trust this information fulfils your request. Under section 28(3) of the Act, you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Ministry website at: www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests.

Nāku noa, nā



Astrid Koornneef

Director

National Immunisation Programme

Appendix 1: Documents for release

#	Date	Title	Decision on release
1	28 August 2021	Appendix 1: COVID-19 digital vaccination update and international vaccination requirements	Released in full.
2	29 October 2021	Domestic COVID-19 vaccination and test certificates: Solution approach for a "summer pass"	Released with some information withheld under section 9(2)(g)(i) of the Act to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers and officers and employees of any public service agency.