Federal Ministry of the Interior

Deployment of live enrollment of facial images in Germany

ICAO Traveller Identification Programme | 20th TRIP Symposium | 5th November 2025

Germany introduces secure digital photo capture for ID documents

November 2020:
The German Bundestag passed the **Act to Improve the Security of Passports and Identity Documents**, which was implemented in May 2025.

Paper photographs are no longer permitted. All photographs must be digitally captured and transmitted.

Balancing security and photographers' interests

- **Photographers' associations' intervention** led to a compromise enabling **secure digital photo submission options**

- Process uses a **certified cloud** by the Federal Office for Information Security for secure photo transfer and eID-based identification

- **Registered photographers authenticate via eID**, upload encrypted photos to the cloud, and issue a Data Matrix code. Authorities use this code to retrieve the photo

- **Citizens can choose** whether to have their biometric photo taken by a photography service provider or directly at the authority.

The new high-tech live enrollment system PointID®

- **Developed** by the state-owned Bundesdruckerei GmbH, in collaboration with the Federal Office for Information Security and the Federal Criminal Police Office

- The system enhances document security, **prevents multiple identities** and **minimizes photo and identity fraud**

- It enables **on-site digital capture** and **direct transmission** of biometric photos to the responsible authorities

- The federal government provides **PointID® equipment** to municipalities **free of charge**

PointID® system in the town of Graben, Germany
Source: Bundesdruckerei GmbH

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Decentralized structures and limited data challenged deployment planning

Initial Situation

Around **14 million identity documents are issued annually** in Germany across **around 11,000 municipalities**.

Autonomous municipalities and the absence of a central database result in **limited federal oversight.**

Outlook

By the end of 2025, **around 9,000 PointID® systems** are expected to be deployed.

The Federal Ministry of the Interior expects well **over 90%** of German passport, ID card, and foreign nationals' **authorities will offer on-site photo capture** in the future.

Data availability and limitations

- **No central database for all authorities in Germany.** Authorities (even with multiple offices) are only listed with one identification number at Bundesdruckerei GmbH
- **Data for deployment planning was insufficient**. Multiple offices under one identification number or outdated contact information required manual verification

Mismatch between workloads and workplaces

- **Devices were allocated per municipality according to estimates based on production numbers** of identity documents, rather than per workstation
- Some municipalities only have few identity document applications during the year but many workstations in their facility

Reliance on feedback from the municipalities

- Lacking a central database, device distribution required **bilateral coordination** and individual contact with municipalities, resulting in **heavy dependence on feedback**
- The simplified approach of estimating device numbers per municipality and **assuming consent in the absence of feedback led to challenges**

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Technical, organizational and administrative factors had to be considered during rollout

Organization and administration

The early federal election in Germany in February 2025 led to **a lack of staff capacity** in the municipalities.

Communication challenge: Ensuring that all municipalities receive complete and consistent project information proved challenging.

Implementation

Delay in delivery and insufficient quality of the initial devices required requesting improvements from the manufacturer.

Some municipalities had only limited IT expertise, necessitating local solutions of technical matters due to the absence of dedicated IT staff in their facility.

The **IT environment** of some municipalities **needed updating** in order to use PointID® systems.

IT structure

Due to the **decentralized IT structure** and differing specialized systems, **processes varied between the federal states**.

A pilot phase (June to October 2023) in 8 municipalities **tested and evaluated the system**, helping identify and address challenges prior to nationwide rollout.

▶ A full-scale pilot would have **required one passport/ID and one foreign nationals' authority per state** – totaling 32 pilot authorities.

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Learnings from the world's largest digitalization project in passport and ID card management

Successful implementation of new passport and ID card regulations on 1st May provided **key insights from the world's largest digitalization project in passport and ID card management**, involving the rollout of a nationwide biometric photo capture system across 6,000 municipality offices.

——— **Choosing the right provider(s)** ———

If possible, **aim to select a single system provider** via a public tender to ensure consistency, efficiency, and simplified integration across the majority of municipalities.

When allowing **multiple certified providers**, local municipalities are obliged to ensure all required regulations are being followed and **refinancing** – either through municipal budgets or state funding – is secured.

When providing a digital biometric photograph system, responsible parties **should refrain from imposing minimum contract durations** for their devices; municipalities should remain free to request new devices **at any time.**

If selected by the state as the sole provider, **all municipalities must be served equally**, including small or less profitable ones; **no exclusivity or competition-limiting clauses** should be permitted.

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Let's keep in touch!

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