

Position Paper

September 2025

eIDAS Implementing Act: Advanced electronic signatures and seals

Summary

Bitkom welcomes the current draft of the Implementing Act on advanced electronic signatures and seals. Our only recommendation at this stage is to address the specific technical point outlined below.

Specific comments on the implementing regulation

Nr.	Article	Action	Justification/Recommendation
1	Annex 1 ‘List of technical specifications for advanced electronic signatures referred to in Article 1(1) and for advanced electronic seals referred to in Article 3(1)’ Section ‘JAdES Baseline Profile’	Amend	Delete the adaptation for ETSI TS 119 182-1 V1.2.1

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