

Position Paper

2025 July

eIDAS Implementing Act: Trusted Lists

Summary

Bitkom highlights the necessity of extending the deadline for the application of the Implementing Act on Trusted Lists under eIDAS Regulation (EU) No. 2024/1183 from 6 to 12 months. This extension is essential to allow both Trust Service Providers and Supervisory Bodies adequate time to adapt, ensuring alignment with the updated framework without disrupting existing infrastructures or undermining trust among public authorities and private sector users.

Specific comments on the implementing regulation

Nr.	Article	Action	Justification/Recommendation
1	Article 2	Amend	A transitional period of 12 months instead of 6 is necessary to allow for the adaptation of both Trust Service Providers and Supervisory Bodies. This time is essential to ensure alignment with the revised framework without disrupting existing infrastructures or undermining trust in the services currently used by public authorities and private actors alike.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

Published by

Bitkom e.V.
Albrechtstr. 10 | 10117 Berlin

Contact person

Lorène Slous | Policy Officer Trust Services & Digital Identities
P +49 30 27576-157 | l.slous@bitkom.org

Responsible Bitkom committee

WG Digital Identities

Copyright

Bitkom 2025

This publication is intended to provide general, non-binding information. The contents reflect the view within Bitkom at the time of publication. Although the information has been prepared with the utmost care, no claims can be made as to its factual accuracy, completeness and/or currency; in particular, this publication cannot take the specific circumstances of individual cases into account. Utilising this information is therefore sole responsibility of the reader. Any liability is excluded. All rights, including the reproduction of extracts, are held by Bitkom.