

Position Paper

March 2026

eIDAS Implementing Act: European Digital Identity Wallets – registration of wallet-relying parties (update)

Summary

From Bitkom's perspective, this initiative amending Commission Implementing Regulation (EU) 2025/848 should ensure coherence of scope and legal clarity. Structural adjustments must be transparent and proportionate to avoid interpretative uncertainty. At the same time, the framework should remain technically flexible and avoid rigid legal embedding of rapidly evolving specifications.

Specific comments on the implementing regulation

Nr.	Article	Action	Justification/Recommendation
1	Overarching comment related to Title / Scope coherence	Amend	The amendment should remain clearly focused on the registration of wallet-relying parties and not unnecessarily reframe the scope toward standards/specifications if not legally required.
2	Annex II (Art. 1 & 2 – internal references)	Amend/Specify	Deletion of references to Article 3 is not transparent. Recommendation: Either reinstate the reference or

			explicitly justify the deletion to avoid interpretative gaps.
3	Annex V (Common API for national registers)	Amend	API specification is highly detailed and likely to evolve. Recommendation: Transfer the technical API specification into an ETSI standard and reference it instead of maintaining static annex text.

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