

Position Paper

March 2026

eIDAS Implementing Act: European Digital Identity Wallets – standards and technical specifications (update)

Summary

From Bitkom's perspective, this initiative amending Commission Implementing Regulations (EU) 2024/2979, 2982, 2977 and 2980 should primarily ensure that highly detailed technical specifications are not statically embedded in the Annexes of the CIRs. Hardcoding APIs, protocol parameters or other low level requirements in legal texts creates maintenance burdens, slows down necessary updates and increases interoperability risks. Wherever possible, the CIR should reference finalised ETSI, CEN or ISO standards, use Annex text only as a transitional solution and allow for controlled versioning.

Accordingly, technical amendments concerning Wallet Attestation, Identity Proofing, Trust Mark specifications and related ETSI documents should be channelled through established ETSI standardisation processes and only subsequently referenced in the CIR.

In addition, unclear terminology should be avoided to prevent interpretation uncertainty, and targeted adjustments should ensure legal completeness and consistency.

Overall, the amended framework should follow a standards based and future proof approach that supports technological evolution, interoperability and legal certainty across the Union.

Specific comments on the implementing regulation

Nr.	Article	Action	Justification/Recommendation
1	Overarching comment about the Annex	Amend	<p>Detailed technical specifications (e.g. APIs, protocol parameters, low-level technical requirements) shall not be statically embedded in CIR Annexes. Such elements are subject to iterative updates and technological evolution. Hardcoding them in legal annexes creates maintenance burdens and interoperability risks, as legal amendments are significantly slower than standardisation updates.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Prefer referencing finalised ETSI/CEN/ISO standards wherever available. • Use Annex text only as a transitional solution. • Apply a versioning approach that allows controlled evolution instead of rigid version pinning.
2	CIR (EU) 2024/2979, Annex III (WIA/WUA)	Amend	<p>Specification is highly technical and iterative.</p> <p>Recommendation: Transfer detailed Wallet Unit / Wallet Instance Attestation specifications into an ETSI deliverable and reference it in the CIR.</p>
3	CIR (EU) 2024/2979, Annex IV (amendments to ETSI TS 119 461 v2.1.1)	Amend	<p>Changes should be channelled through ETSI ESI processes.</p> <p>Recommendation: Integrate modifications into the upcoming update of ETSI EN 319 461 and subsequently update the CIR reference.</p>
4	CIR (EU) 2024/2979, Annex IV (Identity Proofing – “peer reviewed”)	Amend/Delete	<p>The term “peer reviewed” is not defined under eIDAS/eIDAS2 and creates interpretation uncertainty.</p>

			Recommendation: Delete the term and instead rely on conformity assessment or scheme requirements.
5	CIR (EU) 2024/2979, Annex V (amendments to ETSI TS 119 472-1 v1.1.1)	Amend	Changes should be processed via ETSI and integrated into ETSI EN 319 472-1 before CIR reference update.
6	CIR (EU) 2024/2979, Annex XI (Trust Mark specifications)	Amend	Avoid static embedding of detailed Trust Mark specifications in the CIR. Recommendation: Align with ongoing ETSI work and reference the relevant deliverable.
7	CIR (EU) 2024/2982, Annex XIV (amendments to ETSI TS 119 472-2 v1.1.1)	Amend	Amendments should be integrated via ETSI into ETSI EN 319 472-2 before updating the CIR reference.
8	CIR (EU) 2024/2977, Annex I (optional PID table)	Amend	“Nationality” should also cover statelessness and relevant protection status (where applicable). Recommendation: Introduce an optional field or parameter to avoid regulatory gaps.

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