



Council of the  
European Union

Brussels, 25 November 2022  
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2021/0136(COD)**

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14959/22  
ADD 1

**LIMITE**

**TELECOM 473  
COMPET 919  
MI 844  
DATAPROTECT 321  
JAI 1497  
CODEC 1774**

**NOTE**

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From:	Permanent Representatives Committee (Part 1)
To:	Council

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No. prev. doc.:	14344/22
No. Cion doc.:	9471/21

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Subject:	Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2014 as regards establishing a framework for a European Digital Identity General approach - <i>Statement by Denmark</i>
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Delegations will find attached a statement by Denmark on the above subject.

**STATEMENT BY DENMARK****Statement on the Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2104 as regards establishing a framework for a European Digital Identity**

Denmark supports the overall goal of the Regulation in order to ensure harmonized, secure and trusted digital identities available for all Europeans. Further, we support the development of European Digital Identity Wallets. In this respect, we appreciate the significant work carried out on this file and can support the text in the spirit of compromise.

However, we strongly regret that the Regulation maintains the requirement that all European Digital Identity Wallets must meet the requirements set out by the level of assurance 'high'. In our view, such a requirement is not proportionate with the vast majority of use-cases for the European Digital Identity Wallets and we are concerned that European Digital Identity Wallets will not be immediately available for citizens due to requirements such as using external secure hardware, reliance on new and expensive smartphones as well as burdensome processes for on-boarding and subsequent use of the Wallets.

In our view allowing Member States to issue European Digital Identity Wallets under the level of assurance 'substantial' would better facilitate uptake and use, while providing the necessary level of assurance for the vast majority of cases.

Additionally, we appreciate the exemption of micro and small enterprises from the obligation to accept the use of European Digital Identity Wallets, however we still find that the current regulation text may cause many service providers to be forced to implement wallet support for their services, without taking into account proportionality, relevance and demand for the European Digital Identity Wallet in these particular services.

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