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MEETING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Telecommunications and Information Society
Subject:	Discussion Note on the implementation of eIDAS2

In view of the Telecommunications and Information Society Working Party on 25th September, delegations will find attached a discussion note on the implementation of eIDAS2.

Discussion Note on the implementation of eIDAS2

To inform discussions at the WP Telecom on 25 September

The Commission has announced that its legislative proposal introducing the European Business Wallets will be published by the end of the Danish presidency. In the call for evidence, the assumption is that the initiative will be built upon Regulation (EU) 2024/1183 (hereinafter: eIDAS2), amending eIDAS Regulation (EU) 910/2014, while complementing the European Digital Identity Wallet (EUDI Wallet) for natural persons. With this, the European Digital Identity Framework will be expanded to legal entities acknowledging the importance of the timely implementation of the EUDI Wallets, which is why the delegations are also invited to discuss the current “state of play” on the eIDAS2 implementation.

The 2024 amendment of the eIDAS Regulation focuses on strengthening the Digital Single Market and digital sovereignty in the EU, promoting the ability of citizens and businesses to access digital solutions across EU’s borders with European Digital Identity Wallets.

A European Digital Identity Wallet and the way forward

A key initiative within eIDAS2 is the obligation on Member States to provide at least one European Digital Identity Wallet, offering European citizens, residents, and businesses a harmonised approach to a secure, digital identity. The wallet must contain a proof of identity (an eID) at assurance level high, that can be used for identification and authentication in public and private digital services in the EU and enable digitally signing of documents. In addition to the abovementioned functions, the wallet must also be capable of storing electronic attestations of attributes.

The adoption of the implementing acts is progressing well. By beginning of September 2025, 22 Implementing Acts were adopted, 10 of these implementing acts are setting out the relevant requirements for the implementation of the European Digital Identity Wallet ecosystem and 12 focus on (qualified) trust services. With these, all implementing acts that set out the essential technical features needed for the timely development the Wallets have been adopted. Further seven implementing acts focusing on trust services have been submitted for public consultation and are expected to be adopted by Q4 2025.

The eIDAS2 Regulation and the EUDI Wallet are key enablers in developing cohesive, digital public sectors around the EU. Given the approaching implementation deadline, Member States are invited to discuss how the implementation of the EU Digital Identity Wallets is progressing at national level and what further efforts could be undertaken at EU level to support Member States.

A European Business Wallet

As stipulated in the Competitiveness Compass, digitalisation will be closely aligned with simplification efforts, particularly those aimed at reducing reporting requirements. Consequently, the European Business Wallet initiative is expected to have a key role in achieving these simplification goals, with the potential to unlock untapped benefits from the Digital Single Market by reducing complexity, overcoming fragmentation, and streamlining compliance processes for European businesses. It will help achieve the objectives stated in the Single

Market strategy of May 2025, for the digitalisation of the Single Market and the transition from a document-based to a data-driven Single Market, including through digitally accessible procedures, and automated reporting.

As outlined, the upcoming European Business Wallets will be built upon the current eIDAS2 framework, complementing the benefits of the EUDI Wallet for natural persons. Further, the initiative is being referred to by the Commission as: *“the cornerstone of doing business simply and digitally in the EU”* in the Competitiveness Compass. Accordingly, delegations are encouraged to share their experiences with the implementation of eIDAS2, in order to provide input and inform the Commission’s work going forward, including on the Business Wallet.

Guiding questions for the discussions on the 25th of September:

To structure and contextualise the discussions, the Presidency has prepared the following questions for the delegations in order to guide the discussion on the implementation of eIDAS2 as well as the Commission’s ongoing work with the European Business Wallets.

The implementation of eIDAS2

- Are preparations for the issuance of the European Digital Identity Wallet in your country on track to issue wallets before the end of 2026? What obstacles, if any, have you encountered?
- Are you cooperating with other Member States on wallet development and certification? Do you expect support by the Commission in a specific area?
- What is the adoption strategy in Member States to ensure that the entire population (including the elderly population and those with disabilities) will be using the wallet?
- Do you have a strategy at national level to apply the “wallet by default” approach across relevant national legislation?

European Business Wallet

- How do you think the Business Wallet should complement the EUDI Wallet? What added value should it bring?
- How do you envision integrating Business Wallets developed through market-led initiatives into public digital infrastructure?
- How do you foresee the European Business Wallet contributing to the simplification agenda, and can you provide specific use cases or examples within the public sector, where it could effectively reduce administrative burdens and streamline compliance?
- Which already existing digital systems, platforms and registries do you consider most important for businesses in a crossborder context? How should those be integrated?
- How can it be ensured that the European Business Wallets are actively trusted, adopted and used by economic operators and particularly SMEs?