

Hackhofergasse 5/16
A-1190 Vienna
phone: +43 676 940 9309
office@european-signature-dialog.eu
European Transparency Register number: 994150833943-81

EU Business Wallet

COM (2025) 838: QeRDS and implications for an open and competitive European electronic delivery ecosystem

Policy background

The **European Business Wallet (EBW)**, proposed in **COM (2025) 838**, is a key initiative in the EU's agenda to streamline business–government interactions and strengthen the Single Market through digitalization.

It establishes a common framework for legally valid digital exchanges involving legal persons, with **Qualified Electronic Registered Delivery Services (QeRDS)** envisaged as a core component of the communication infrastructure.

The role of QeRDS in the Business Wallet: designation risks and market implications

Annex 11 introduces a particularly significant element, providing that the Commission shall, through implementing acts, define the legally effective communication channel of the Business Wallet, including through the **designation of a QeRDS**.

This approach reflects the objective of addressing market fragmentation and ensuring the timely deployment of a functional EU-wide communication infrastructure.

However, the current formulation raises a potential regulatory risk, as such designation could be interpreted as the identification of a specific service or technical architecture, rather than the definition of technical specifications enabling interoperability between Business Wallets and QeRDS systems already in place and serving millions of clients.

This approach may create tensions with the principles of **technological neutrality, market openness and plurality of providers** underpinning the eIDAS framework, as well as with the open and market-driven approach reflected in the Commission's own analysis, potentially leading to convergence towards a single technical solution and to distortive effects on competition. In addition to that, it puts the future of legacy QERDS systems already in place in question.

These risks are further amplified by the fact that the proposal introduces **obligations for public sector bodies** to use and support the EBW communication channel for legally relevant communications, potentially excluding existing systems — even where these are already functional, interoperable and built on significant public and private investments across Member States — while limiting the ability of the market to adapt progressively.

In this context, it is essential to clarify that the designation provided for in Annex 11 should be understood as the definition of an EBW–QeRDS interoperability profile, based on common technical specifications and interfaces, rather than the identification of a single service, specific subset of Qualified Trust Services Providers (e.g. “designated”, that means in Poland only one public entity) or specific architecture.

Conclusions

The EBW framework **should avoid the designation of a single QeRDS** as the communication channel, and instead rely on an open, interoperable approach based on common technical specifications and interfaces.

ESD therefore suggests:

- **No designation of a specific service**, but definition of an EBW–QeRDS interoperability profile enabling wallet-to-wallet communication.
- **An open and market-driven model**, preserving technological neutrality, competition and plurality of providers in line with eIDAS.
- **A “trust by default” approach**, reaffirming the role of trust services as a foundational layer of the European digital infrastructure where Business Wallet solutions will effectively rely on the already existing Trust Services framework.
- **Proportionate technical specifications**, allowing existing and future providers to progressively align with the EBW ecosystem.
- **Support for transitional solutions (e.g. gateways)**, ensuring continuity with existing systems and limiting disruption.
- **Implementation timelines aligned with implementing acts**, reflecting the need for stable and consolidated technical specifications and allow time for the adoption by market players.

Proposed amendments reflecting this approach are set out in the Annex of this document.

About the European Signature Dialog

The European Signature Dialog (ESD) brings together leading European providers of qualified trust services, collectively serving over 250 million users. All ESD members are listed on the EU Trusted List and operate under strict compliance with EU legislation, in particular the eIDAS

framework — the EU's legal and technical foundation for secure and legally valid digital transactions.

ESD acts as a key interlocutor for European and national institutions. What distinguishes ESD is its strong operational perspective: our members work daily in the market, implementing these requirements and related frameworks in real-world use cases.

This hands-on experience allows us to provide practical, implementation-oriented input to policymakers, particularly on initiatives such as the European Digital Identity framework, the EUDI Wallet, and the Business Wallet.

Annex

Proposed textual amendments to COM (2025) 838

The following amendments aim to ensure an **open and interoperable implementation of the European Business Wallet**, avoiding the designation of specific services and supporting a gradual market transition in line with the eIDAS framework.

A. Annex § 11 – Secure legal communication channel for the Business Wallet

- (1) Amendments are proposed to clarify that the secure legal communication channel of the Business Wallet should be based on an **interoperable framework**, defined through common technical specifications and interfaces, rather than the designation of a specific service. In line with Article 5 of this Regulation, Business Wallets shall integrate and support the use of a ~~specific~~ qualified electronic registered delivery services **that comply with the technical and interoperability requirements established pursuant to subpoint 2**, in accordance with Articles 43 and 44 of Regulation (EU) No 910/2014.
- (2) The Commission shall, by means of implementing acts:
 - (a) ~~designate one~~ **establish a common set of technical and operational requirements, including a standardised interface, for** qualified electronic registered delivery services ~~that shall serve as to be used as the mandatory means of a~~ secure legal communication channel for European Business Wallets;
 - (b) define the minimum technical and interoperability requirements that such qualified electronic registered delivery services must fulfil, including alignment with the reference standards, specifications and procedures established under Articles 43 and 44 of Regulation (EU) No 910/2014;
 - (c) ensure that the ~~chosen~~ qualified electronic registered delivery services **referred to in subpoint 1** ~~is~~ **are** based on open, publicly available and royalty-free standards to guarantee interoperability and prevent vendor lock-in;
 - (d) ensure that the ~~chosen~~ qualified electronic registered delivery services **referred to in subpoint 1** ~~provides~~ end-to-end encryption to guarantee confidentiality;
 - (e) establish procedures for ensuring continuous availability, redundancy and fallback mechanisms in case of service failure.
- (3) Interoperability between Business Wallets and the ~~designated~~ qualified electronic registered delivery services **referred to in subpoint 1** shall be mandatory, **in accordance with the technical and interoperability requirements established pursuant to subpoint 2**. Providers of Business Wallets shall ensure technical integration in accordance with ~~the~~ **those** implementing acts ~~referred to in subpoint~~

B. Article 16 – Obligations on public sector bodies

Amendments are proposed to ensure that the obligations on public sector bodies support an **open and gradual implementation** of the Business Wallet, allowing for the integration of existing systems and avoiding unintended market distortions. Adoption of the Business Wallet will depend significantly on the ability of integration with existing systems and processes.

Proposal for a Regulation – Article 16

1. By [Publications Office, please insert the date 24 months after the entry into force of ~~this Regulation~~ **the implementing acts referred to in Articles 5 and 6**] public sector bodies shall enable economic operators to take the following actions by using the core functionalities of European Business Wallets as set out in Article 5(1):

- (a) identify and authenticate;
- (b) sign or seal;
- (c) submit documents;
- (d) send or receive notifications.

The actions listed in points (a) to (d) of the first subparagraph shall take place for the purpose of meeting a reporting obligation or fulfilling an administrative procedure.

2. For the purposes of paragraph 1, points (c) and (d), public sector bodies shall have European Business Wallets, including the qualified electronic registered delivery service referred to in Article 5(1), point (i).
3. By way of derogation from paragraph 2 and until [Publications Office, insert the date 36 months after entry into force of ~~this Regulation~~ **the implementing acts referred to in Articles 5 and 6**], public sector bodies may choose not to offer the qualified electronic registered delivery service referred to in Article 5(1), point (i), and support instead other existing alternative solutions which enable economic operators to take the actions listed in paragraph 1, points (c) and (d), provided those solutions:
 - (a) comply with the requirements applicable to qualified electronic registered delivery services set out in Regulation (EU) No 910/2014;
 - (b) offer a gateway that enables European Business Wallet owners to submit documents and send and receive notifications **using through interfaces compliant with the interoperability profile between European Business Wallets and the** qualified electronic registered delivery services referred to in Article 5(1), point (i).

After the expiry of the derogation period laid down in this paragraph, public sector bodies may continue to support the alternative solutions referred to in that subparagraph but

shall, in accordance with paragraph 2, have European Business Wallets, including the qualified electronic registered delivery service referred to in paragraph 1 of Article 5(1), point (i).