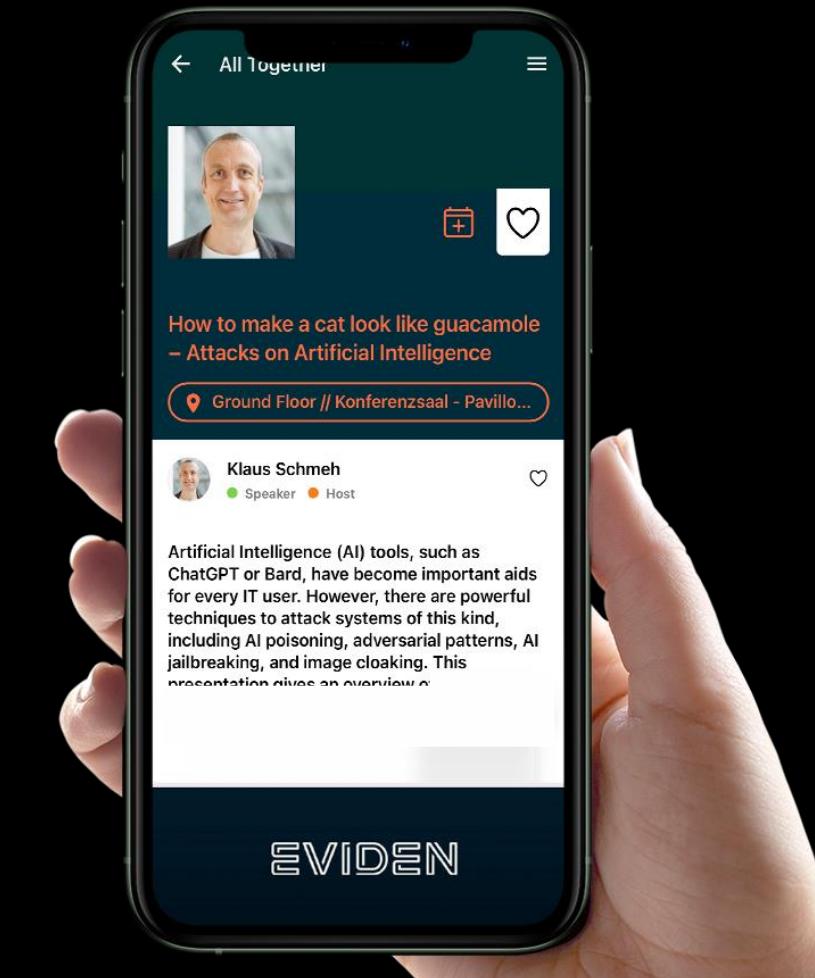


# MINDSHARE AGENDA



GET APP





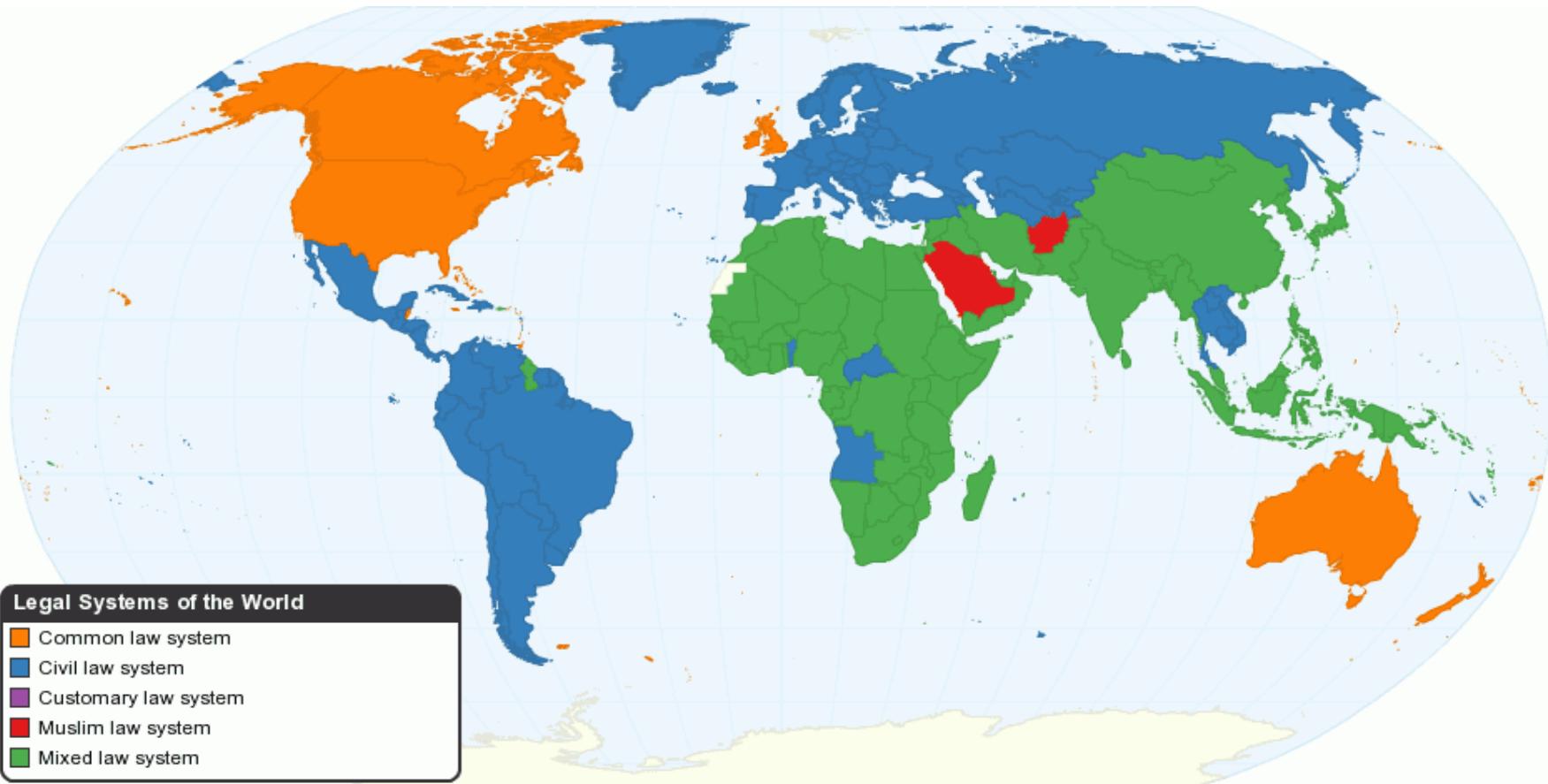
# eIDAS 2024: Will regulation preserve the sovereignty of digital identities in Europe?

Mindshare, Gelsenkirchen 2025

Arno Fiedler, Nimbus Technology Consulting

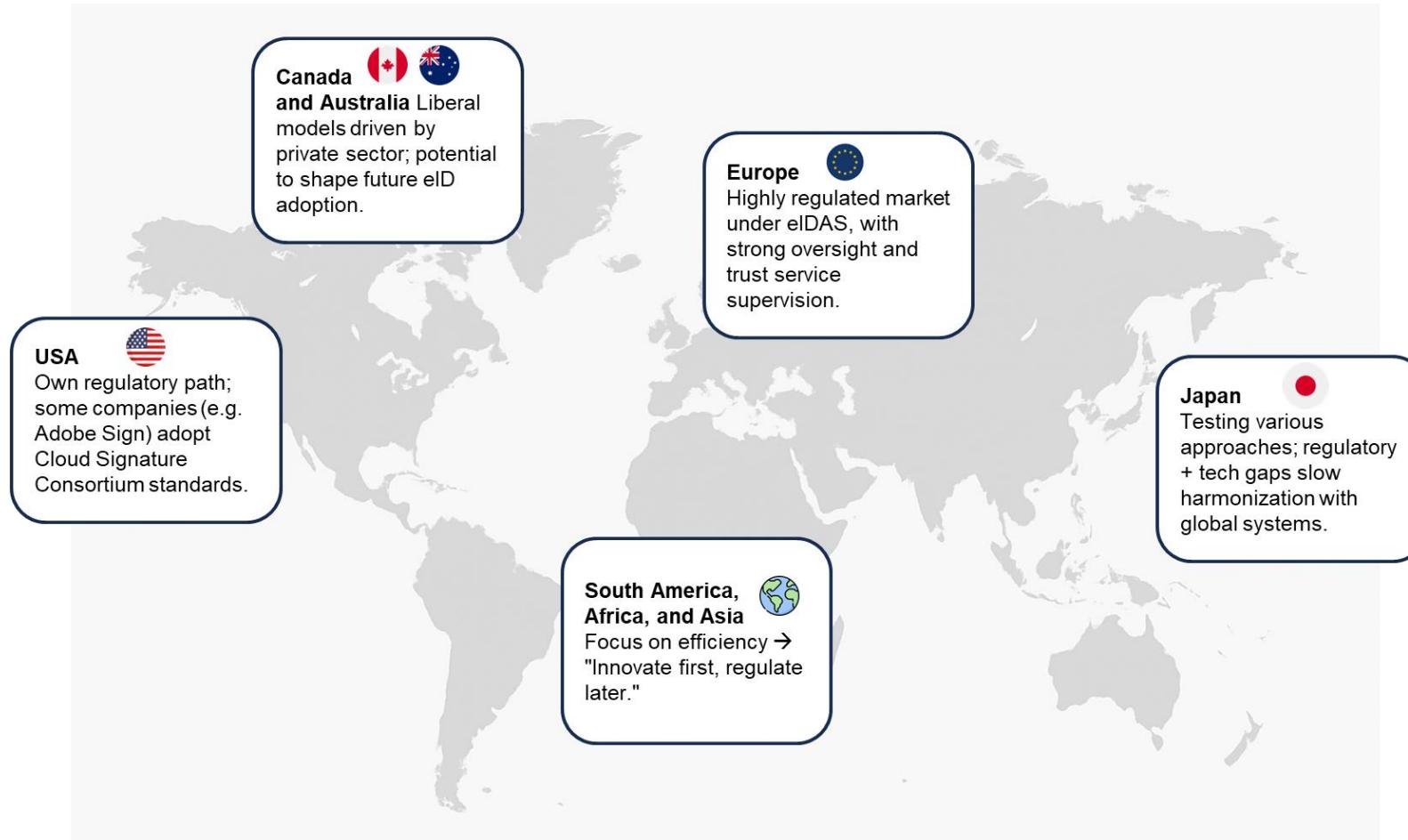
# Different Legal systems of the world

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<https://nlc-ballb.blogspot.com/2017/05/common-legal-systems-of-world.html>

# eIDs and Trust Services worldwide



# Europe loves regulating



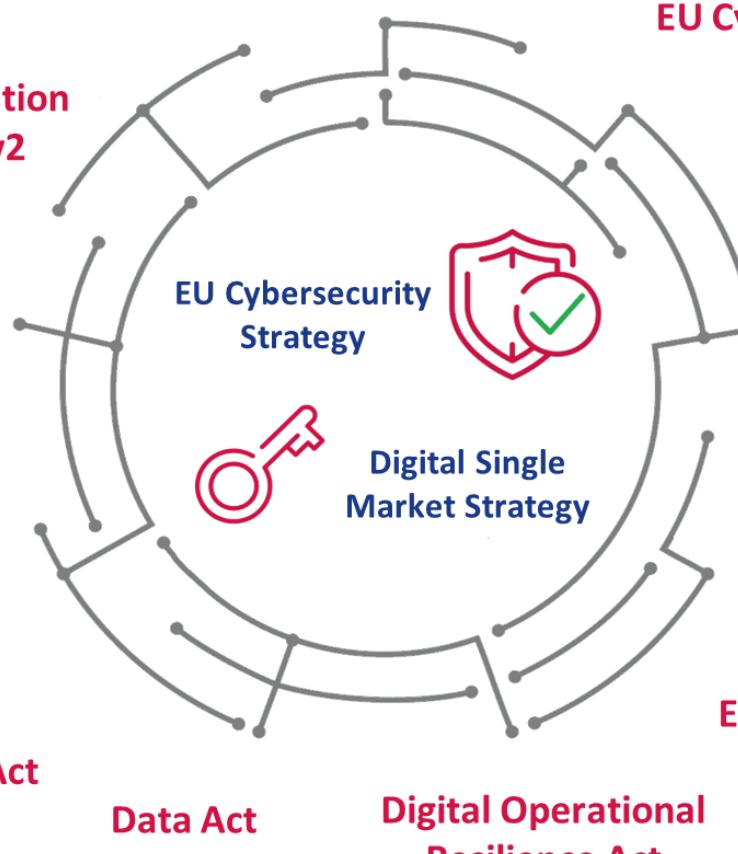
Network and Information  
Security Directive v2

Radio Equipment  
Directive

EU Chips Act

eIDAS Regulation

EU Cyber Solidarity Act



General Data  
Protection Regulation

Digital Markets Act

Cyber Resilience Act

Digital Services Act

Artificial Intelligence Act

EU Data Governance Act



Source: Slawomir Gorniak, ENISA Cybersecurity Standardisation Conference,  
[https://www.enisa.europa.eu/events/cybersecurity\\_standardisation\\_2024/pdf/gorniak.pdf](https://www.enisa.europa.eu/events/cybersecurity_standardisation_2024/pdf/gorniak.pdf)

# The thing with tech regulation...



# Europe's solution for digital identity 2014

## Conformity = Notification only

- Notification as an instrument for checking conformity is only practicable to a limited extent.

## No binding interoperability

- National eID technology is implemented extremely heterogeneously, no urge for harmonization recognizable.

## Complex SAML node system

- The system of nodes for exchanging SAML tokens is cumbersome and difficult to integrate.

## No EU-wide Harmonization

- Cross-border use is very rare despite the once-only principle and large-scale pilots.



**mObywatel 2.0**

Will regulation succeed in protecting this data  
from access by ‘very large operators’  
overseas? ...

# Europe's solution for digital identity 2024



«The Commission will soon propose a **secure European e-identity**. One that we trust and that any citizen can use anywhere in Europe to do anything from paying your taxes to renting a bicycle. A technology where we can control ourselves what data and how data is used. »

(State of the Union - 16 September 2020)

« The European Council calls for the development of **an EU-wide framework for secure public electronic identification (e-ID)**, including interoperable digital signatures, to provide people with **control over their online identity and data** as well as to enable **access to public, private and cross-border digital services**. »

(European Council Conclusions - 2 October 2020)

# European Digital Identity Wallet

## Core principles

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- All EU member states must provide their citizens a **certified EUDI wallet** by the 24th of December 2026
- Means for authentication on LoA high (offline and online)
- Integrated Qualified Electronic Signature, free of charge for non-professional usage
- New trust services: Qualified Electronic Attestations of Attributes
- **Mandatory acceptance as authentication means for very large online platforms** and several sectors

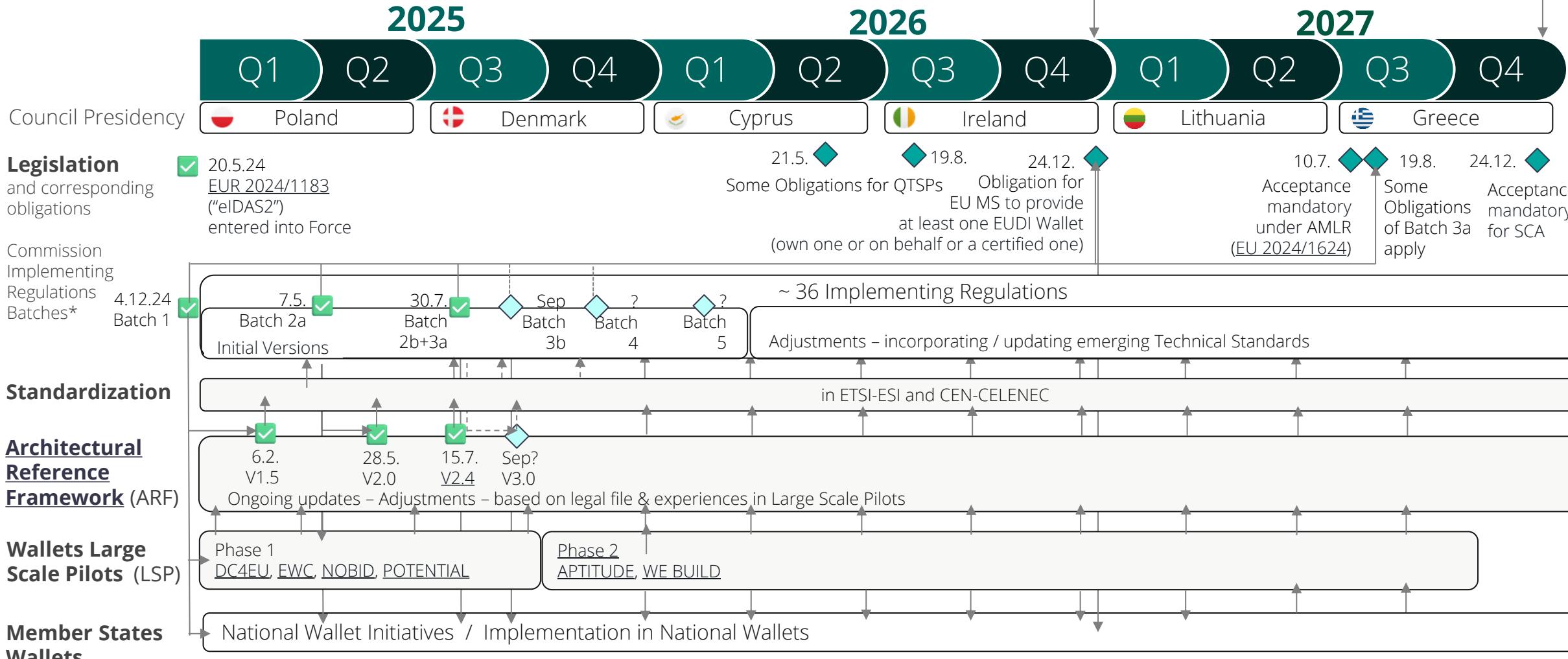




# European Digital Identity Framework as part of eIDAS – Timeline



EU Digital Identity  
Wallet



\* Dates = Publications in EU Official Journal (OJ)

European Commission: European Digital Identity Wallet Home - Official website

European Commission: eIDAS Consolidated Text (Regulation 910/2014 + 2024/1183)



# EU Regulation 2024/1183 – Implementing Regulations Tracker

Aug 12, 2025: Published 16 (in 3 batches), Publication pending 6, Drafts open for review 0, Voting pending 3, Awaiting drafts for review 11 - Total maybe ~ 36

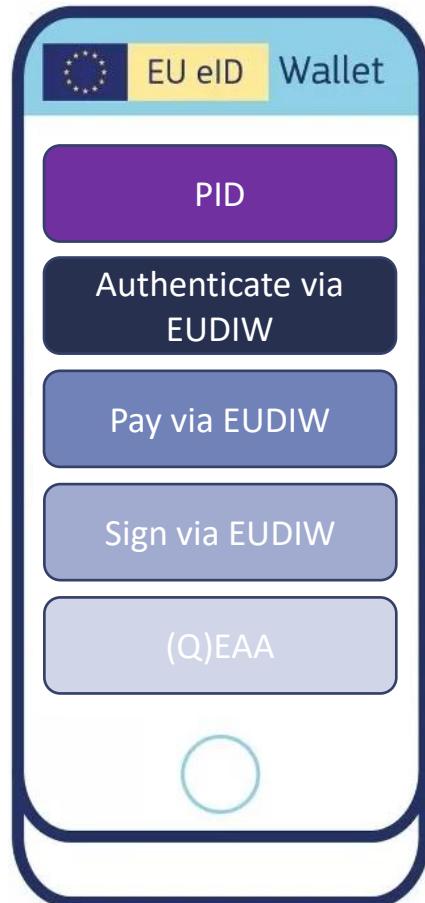
Batch	Consultation	Implementing Regulations (IR) covered	eIDAS Article(s)	CIR	Publication*	In Force
1	Aug 12 2024 – Sep 9 2024	<ul style="list-style-type: none"> <li>Integrity and Functionalities</li> <li>Person Identification Data (PID) and Electronic Attestations of Attributes (EEAA)</li> <li>Protocols and Interfaces</li> <li>Ecosystem Notifications</li> <li>Certification</li> </ul>	5a(23) 5a(23) 5a(23) 5a(23) 5c(6)	<a href="#">2024/2979</a> <a href="#">2024/2977</a> <a href="#">2024/2982</a> <a href="#">2024/2980</a> <a href="#">2024/2981</a>	Dec 4, 2024	Dec 24, 2024
2a	Nov 29 2024 – Jan 2 2025	<ul style="list-style-type: none"> <li><u>Relying Parties Registration</u></li> <li><u>Wallet Register / "Trusted List"</u></li> <li><u>Security breaches</u></li> <li><u>Cross border Identity Matching</u></li> </ul>	5b(11) 5d(7) 5e(5) 11a(3)	<a href="#">2025/848</a> <a href="#">2025/849</a> <a href="#">2025/847</a> <a href="#">2025/846</a>	May 7, 2025	May 27, 2025
2b	Nov 29 2024 – Jan 2 2025	<ul style="list-style-type: none"> <li><u>Electronic Attestation of Attributes</u></li> </ul>	45d(5), 45e(2), 45f(6), 45f(7)	<a href="#">2025/1569</a>	Jul 30, 2025	Aug 19, 2025
3a	Apr 15 2025 – May 13 2025	<ul style="list-style-type: none"> <li><u>Verification of Identity &amp; Attributes when Issuing Qualified Certificates/Attestations</u></li> <li><u>Management of remote qualified electronic signature creation devices (rQSCDs)</u></li> <li><u>Procedural arrangements for peer reviews of electronic identification schemes</u></li> <li><u>Notifications of certified qualified electronic signature/seal creation devices</u></li> <li><u>Annual reports from supervisory bodies</u></li> <li><u>Initiation of qualified trust services</u></li> </ul>	24(1c) 29a(2), 39a 31(3), 39(3) 21(4) 46a/b(7) 21(4)	<a href="#">2025/1566</a> <a href="#">2025/1567</a> <a href="#">2025/1568</a> <a href="#">2025/1570</a> <a href="#">2025/1571</a> <a href="#">2025/1572</a>	Jul 30, 2025	Aug 19, 2025
3b	Apr 15 2025 – May 13 2025	<ul style="list-style-type: none"> <li><u>Qualified certificates for electronic signatures and qualified certificates for electronic seals</u></li> <li><u>Validation of qualified and advanced electronic signatures/seals based on qualified certificates</u></li> <li><u>Qualified preservation services for qualified electronic signatures/seals</u></li> <li><u>Qualified validation services for qualified electronic signatures/seals</u></li> <li><u>Qualified timestamps</u></li> <li><u>Qualified electronic registered delivery services</u></li> </ul>	28(6), 38(6) 32(3), 32a(3), 40, 40a 34(2), 40 33(2), 40 42(2) 44(2)		Sep ?	
4	June 20 2025 – July 18 2025	<ul style="list-style-type: none"> <li><u>Accreditation of Conformity Assessment Bodies (CAB)</u></li> <li><u>Risk management procedures for non-qualified trust service providers</u></li> <li><u>Trusted Lists</u> (Amendment of IR 2015/1505)</li> </ul>	20(4) 19a(2) 22(1)			
5	Opening t b d	May contain topics such as Electronic Archiving & Electronic Ledger – We'll see ...				?
6 ?	Opening t b d	... There may be an (informal?) sixth batch ... with "Further Implementing Regulations" May contain topics such as EUDI Wallet On-boarding and Levels of Assurance				

Stay tuned for our frequent updates

\*Prior to every publication of an implementing act there needs to be a positive vote on it in the [eIDAS Digital Identity Coordination Group](#). (Roles of this group are defined in Art. 46e (7)

...Or is the project too big for  
European providers?

# EUDIW vs. Big Tech Wallets



- Contains state-issued eID (trusted source)
- Enables legally binding signatures
- Official documents (QEAs)
- Payment function (?)
- Certified & regulated
- Massive user base and global reach
- Adoption through innovation & partnerships
- Store payment cards, IDs & driving licenses (in some states)
- Usability and dependencies



# Regulation & sovereignty vs. Scale & Simplicity

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## EU APPROACH

- Complex requirements hinder private sector adoption
- Focus on liability and national data sovereignty
- Slow consensus-building among 27 Member States
- Protection & sovereignty prioritized over usability
- **Standardization through regulation and policies**

## BIG TECH APPROACH

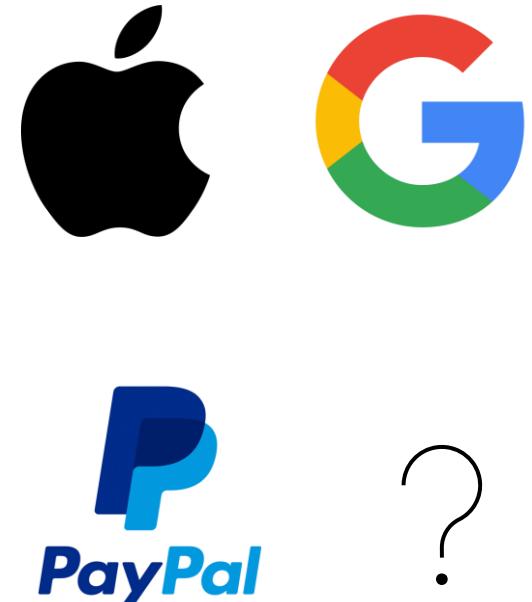
- Private sector aligns due to massive user base worldwide
- Lack of transparency in data processing enables user profiling
- Seamless onboarding and intuitive user journey
- Scale & adoption prioritized over regulation and privacy
- **De facto standardization through market power**

# Monetizing Digital Identity and Trust – learning from Payment

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## Example PayPal

- 400M users worldwide
- 30BN revenue (2023)
- Fee model
  - Fixed: approx. €0.39 per transaction
  - Variable: ~2.99% of transaction value
- Merchants include fees in product & service prices → **costs are indirectly borne by consumers.**
- Peer-to-peer transactions are free of charge → **drives adoption, reach & network effects**

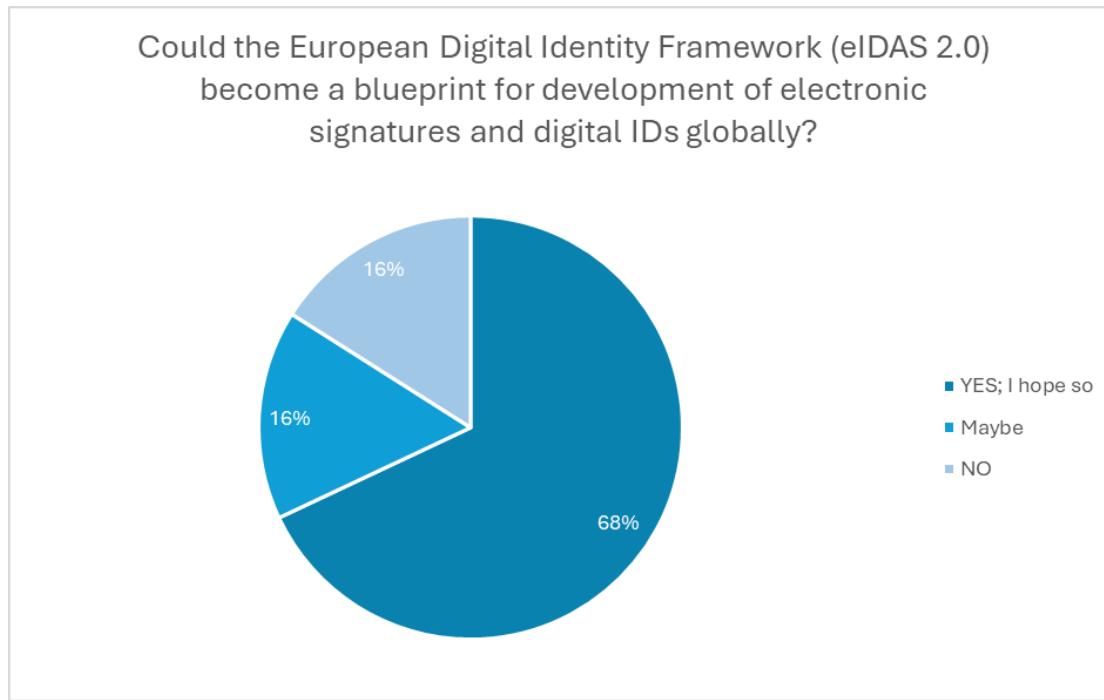


# Will regulation preserve the sovereignty of digital identities in Europe?...

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...Or will it be a barrier to it?

# European Digital Identity Framework as a blueprint for other regions



- EU Digital Identity Framework seen as potential global standard
- “Brussels Effect” could support adoption
- Success will depend on simplicity, interoperability & promotion

**Europe must dare to enforce regulation on Big Tech to ensure fair market conditions.**

Source: e-survey conducted on request of Cloud Signature Consortium on 12.2024-02.2025; N=100

Thank you!

FEEL FREE TO  
REACH OUT TO  
US



**Arno Fiedler,**  
Managing  
Director &  
Senior Expert



**Franziska Granc,**  
Senior Project  
Manager



# TAKE A MINUTE AND GIVE US FEEDBACK

