



Opinion of the European Economic and Social Committee

**Proposal for a Regulation of the European Parliament and of the Council on the establishment of
European Business Wallets**

(COM(2025) 838 final – 2025/0358 (COD))

(C/2026/3226)

Rapporteur: **Philip VON BROCKDORFF**

Legislative procedure	EU Law Tracker
Referral	European Parliament, 5.12.2025 Council of the European Union, 19.1.2026
Legal basis	Article 114 of the Treaty on the Functioning of the European Union
European Commission document	COM(2025) 838 final – 2025/0358 (COD)
Relevant Sustainable Development Goals (SDGs)	SDG 9
Section responsible	Single Market, Production and Consumption
Adopted in section	11.2.2026
Adopted at plenary session	18.3.2026
Plenary session No	604
Outcome of vote (for/against/abstentions)	190/2/3

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC):

- 1.1. underlines the need to ensure alignment between the European Business Wallet and real business needs, going beyond simplification;
- 1.2. calls for more harmonised identity matching and mandate structures as well as a clear distinction between the digital identity wallet and the business wallet, defining their respective roles, regulatory scope and interaction with sectoral legislation;
- 1.3. emphasises the importance of ensuring security and accountability as well as clear communication and trustworthiness;
- 1.4. calls for international operability of the European Business Wallet;
- 1.5. underlines the need to ensure that workers tasked with the management of the European Business Wallets are adequately protected;
- 1.6. recommends that Member States should provide incentives to SMEs and microenterprises to adopt the European Business Wallet;

1.7. emphasises the importance of ensuring the legal accuracy of translations of nomenclatures describing the type of corporate structure or association, which may be very specific at the national level.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.1

2.1. The lack of a harmonised approach in the EU has limited the Digital Single Market's effectiveness. It has discouraged automation, undermined trust in cross-border exchanges and slowed down transactions in both B2G and B2B settings. This problem affects not only regulatory reporting, but also supplier onboarding, due diligence and licensing processes – areas where efficient, trusted and legally recognised digital interaction is increasingly essential in business.

2.2. The proposed European Business Wallet has the potential to address these issues by introducing a legally recognised, interoperable identity solution tailored to economic operators. It would also improve the legal security of transactions and the provision of intellectual or commercial services. However, to be effective, it must resolve issues at both the legal and technical levels – and be implemented in a way that ensures universal adoption and legal clarity across Member States. It may be useful to consider the roll-out of the European Business Wallet from a longer-term perspective by preparing the solutions required for B2G and B2B settings in a technical sense, factoring the preconditions for interoperability without compromising privacy. This would also help reduce potential costs related to future adaptations and upgrades, compared to introducing structural changes to the system at a later point.

2.3. The EESC notes that the European Business Wallet and European Digital Identity Portfolio are two key components of the EU's digital strategy. Whereas the European Digital Wallet is designed for individuals, both wallets can streamline operations, enhance industrial competitiveness and simplify compliance for businesses and public sector bodies. They should also facilitate the legal creation and closure of businesses, as part of a broader European strategy aimed at minimising the administrative constraints and time required for these legal entities to be set up, transformed or closed.

2.4. Clarifying the relationship between the proposed European business Wallet and the existing European Digital Identity Wallet is essential to ensure that both instruments function coherently. Under the original eIDAS framework, both natural persons and legal entities fall within its scope. The European Business Wallet, therefore, is conceived as a complementary mechanism to the Digital Identity Wallet, offering functionalities tailored specifically to the needs of economic operators. By narrowing its functionalities and making a clear distinction, the proposal is expected to draw a firm line between identity solutions for individuals and dedicated tools for businesses, considering the fact that despite similarities in their technical functionalities, they target different users and use cases.

2.5. The European Business Wallet should be developed based on experiences that reflect the operational needs of businesses and bring the most added value. These include the capacity to digitally prove a legal person's identity, share verified credentials, attestations and mandates and fulfil legal obligations in cross-border contexts. Priority should be given to functions such as onboarding, licensing, ESG disclosures and public procurement – all of which require trusted identity and data exchange. It is also necessary to maximise the wallet's added value and adoption while minimising reporting obligations.

Arguments in support of recommendation 1.2

2.6. To ensure legal certainty, the European Business Wallet should rely on cross-border identity matching for all legal entities and economically active individuals (be they self-employed persons or posted workers), leveraging existing registries and solutions to provide flexibility and avoid duplication. At the same time the risk of overreach and added costs for SMEs and self-employed persons should be avoided. The EESC is also of the view that a common approach, allowing the designation of authorised representatives while maintaining flexibility and linking them to clearly defined scopes of authority, would be the preferred approach (where gaps exist, proportionate minimum criteria could be considered, taking into account national specificities and any administrative burden). Where existing national registries are incomplete or fragmented, minimum criteria for issuing credentials to ensure full business coverage should be established.

2.7. The EESC agrees that national authorities should be required to both issue and accept digitally signed, machine-readable credentials within their remit as they do with licences, permits, certificates, registry extracts, etc. However, this requires clear rules to define how these credentials are issued, stored and used, as the widespread availability of trusted public sector credentials will be key to encouraging private-sector adoption.

2.8. While minimising additional costs to businesses, the EESC also encourages the establishment of a pan-European mechanism to allow competent authorities to confirm which organisations are authorised to issue sector-specific credentials – such as banks, healthcare providers or accreditation bodies – ensuring cross-border verifiability whilst preserving sectoral oversight.

Arguments in support of recommendation 1.3

2.9. It is important that the European Business Wallet support a variety of implementation models – including mobile, enterprise-integrated and cloud-based solutions – and allow participation by competent public and private providers.

2.10. Technical specifications should be based on open, interoperable standards to facilitate integration with existing business systems, particularly for SMEs. In this connection, the EESC notes that the proposed regulatory framework avoids prescribing architecture or formats, focusing instead on legal effect and interoperability.

2.11. The EESC is of the view that the proposed regulation should focus more on verifiable credentials, rather than on the design or implementation of wallets. This will allow wallet providers – whether apps, enterprise tools or cloud services – to compete on usability, innovation and features without being constrained by overly rigid regulatory requirements. This would foster competition and innovation in businesses.

Arguments in support of recommendation 1.4

2.12. The European Business Wallet must, of course, include appropriate safeguards to prevent fraud, ensure data integrity and enable traceability. Authentication mechanisms, access controls and audit logs should be standard features. The EESC notes that accountability requires that credentials and actions be attributable to legal representatives and welcomes the risk-based implementation approach proposed in the legislation with requirements for assurance and verification at EU level being kept at a minimum.

2.13. The European Business Wallet extends the ecosystem of trust within a wider digital identity framework and is expected to further foster the trust level in the Digital Single Market. Trust in the system's security and governance is essential for widespread uptake and long-term credibility. Clear communication and transparency reduce uncertainty, support correct use across Member States and encourage economic operators to participate, especially if provided with technical support and real-world examples. Development of the wallet with EU technology and by providers of the EU IT ecosystem would minimise security risks, including risks linked to third-country control or influence by meeting all EU and national cybersecurity standards and ensuring the confidentiality, integrity, authenticity, availability and interoperability of wallet services.

Arguments in support of recommendation 1.5

2.14. The EESC is of the view that the European Business Wallet should be also built to operate outside the Single Market, in alignment with international frameworks but in an environment which is resilient and future proof. European businesses also operate globally and need solutions that make interoperability with third-country systems secure. Compatibility with global identifiers (e.g. LEI), standardised interoperable data formats and internationally recognised credentials are essential to ensure long-term relevance and usability.

Arguments in support of recommendation 1.6

2.15. Although the European Business Wallet is formally addressed to economic operators and public authorities, in practice the wallet will be operated by workers acting on behalf of businesses and state entities. It is therefore legitimate to ensure that major digitalisation initiatives which alter the organisation of work, responsibility and skills sets also acknowledge the human dimension.

2.16. The European Business Wallet aims to automate administrative and compliance processes and hence it is expected to change the job description of workers tasked with its operation. This should be factored in during the transition.

Arguments in support of recommendation 1.7

2.17. Whereas the EESC agrees that the European Business Wallet should be introduced on a voluntary basis for businesses (state entities will be obliged to accept its core functions), to incentivise its adoption which aims to increase efficiency in cross-border interactions, especially for SMEs, Member States should provide tax incentives to ensure the European Business Wallet is widely adopted and eventually becomes the standard for trusted digital interactions, simplifying compliance and reducing administrative burdens, while offering cost savings and a competitive advantage.

2.18. The expectation is that usage will grow organically as businesses recognise the benefits and the European Business Wallet becomes the standard for secure, legally recognised digital interactions across the EU.

Arguments in support of recommendation 1.8

2.19. Europe offers a variety of legal structures for companies, each with its own set of advantages and regulations, and hence must be considered in the adoption of the European Business Wallet.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendation 1.4

Text proposed by the European Commission	EESC amendment
Article 7	Article 7
Requirements and obligations for providers of European Business Wallets	Requirements and obligations for providers of European Business Wallets
[...]	[...]
6. Providers of European Business Wallets shall:	6. Providers of European Business Wallets shall:
(a) [...]	(a) [...]
(b) ensure that European Business Wallet owners are clearly informed, in a user friendly, concise and accessible manner, about the terms and conditions of use of the European Business Wallet, including the scope and limitations of core and additional functionalities, cybersecurity standards, and the European Business Wallet owner's rights with regard to data portability, redress, and termination of service;	(b) ensure that European Business Wallet owners are clearly informed, in a user friendly, concise and accessible manner, about the terms and conditions of use of the European Business Wallet and any changes to such terms and conditions , including the scope and limitations of core and additional functionalities, cybersecurity standards, and the European Business Wallet owner's rights with regard to data portability, redress, and termination of service;

Reason

Terms and conditions may change from time to time.

Amendment 2

linked to recommendation 1.4

Text proposed by the European Commission	EESC amendment
Article 13	Article 13
Governance and supervision	Governance and supervision
[...]	[...]
3. Member States shall ensure that the supervisory bodies referred to in paragraph 1 have the necessary powers and adequate resources for the exercise of their tasks in an effective, efficient and independent manner.	3. Member States shall ensure that the supervisory bodies referred to in paragraph 1 have the necessary powers and adequate technical and competent resources for the exercise of their tasks in an effective, efficient and independent manner.

Reason

Resources should refer to technically qualified personnel.

Amendment 3

linked to recommendation 1.5

Text proposed by the European Commission	EESC amendment
Article 17	Article 17
Business wallets and other similar instruments and frameworks offered in third countries	Business wallets and other similar instruments and frameworks offered in third countries
[...]	[...]
2. The Commission may adopt implementing acts establishing that third country frameworks for systems offering similar functions as the European Business Wallets are to be considered as offering assurances that are equivalent to European Business Wallets issued in accordance with this Regulation, provided that the systems provided under that framework are interoperable with the trust framework laid down in Regulation (EU) 910/2014 and allow for the support of at least an identification and authentication functionality and the exchange of electronic attestations of attributes. Such implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19.	2. The Commission may adopt implementing acts establishing that third country frameworks for systems offering similar functions as the European Business Wallets are to be considered as offering assurances about their resilience and future proof , equivalent to European Business Wallets issued in accordance with this Regulation, provided that the systems provided under that framework are interoperable with the trust framework laid down in Regulation (EU) 910/2014 and allow for the support of at least an identification and authentication functionality and the exchange of electronic attestations of attributes. Such implementing acts shall be adopted in accordance with the examination procedure referred to in Article 19.

Reason

Interoperability beyond the Single Market should be secure and future proof.

Brussels, 18 March 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND