2025/2164

28.10.2025.

PROVEDBENA ODLUKA KOMISIJE (EU) 2025/2164

od 27. listopada 2025.

o izmjeni Provedbene odluke (EU) 2015/1505 u pogledu verzije norme na kojoj se temelji zajednički predložak za pouzdane popise

EUROPSKA KOMISIJA,

uzimajući u obzir Ugovor o funkcioniranju Europske unije,

uzimajući u obzir Uredbu (EU) br. 910/2014 Europskog parlamenta i Vijeća od 23. srpnja 2014. o elektroničkoj identifikaciji i uslugama povjerenja za elektroničke transakcije na unutarnjem tržištu i stavljanju izvan snage Direktive 1999/93/EZ ([1]), a posebno njezin članak 22. stavak 5.,

budući da:

(1) Pouzdani popisi iz članka 22. stavka 1. Uredbe (EU) br. 910/2014 bitni su za izgradnju povjerenja među tržišnim operaterima jer omogućuju validaciju kvalificiranog statusa pružatelja usluga povjerenja i usluga povjerenja koje oni pružaju. Kvalificirani pružatelji usluga povjerenja stoga kvalificiranu uslugu povjerenja trebaju početi pružati tek nakon što se kvalificirani status navede u pouzdanim popisima.

(2) Provedbenom odlukom Komisije (EU) 2015/1505 ([2]) utvrđene su tehničke specifikacije i formati koji se odnose na pouzdane popise. Za te specifikacije i formate iskorišteni su specifikacije i zahtjevi utvrđeni u verziji 2.1.1. norme ETSI TS 119 612.

(3) Uredba (EU) br. 910/2014 izmijenjena je Uredbom (EU) 2024/1183 Europskog parlamenta i Vijeća ([3]), kojom su uvedene nove kvalificirane usluge povjerenja: upravljanje kvalificiranim sredstvima za izradu elektroničkih potpisa na daljinu, upravljanje kvalificiranim sredstvima za izradu elektroničkih pečata na daljinu, izdavanje kvalificirane elektroničke potvrde atributa, pružanje kvalificiranih usluga elektroničkog arhiviranja i bilježenje elektroničkih podataka u kvalificiranu elektroničku evidenciju. Norma ETSI TS 119 612 ažurirana je i u sadašnjoj verziji 2.4.1. sadržava specifikacije koje omogućuju da pouzdani popisi uključuju i prikazuju status tih novih kvalificiranih usluga povjerenja. U ažuriranoj verziji 2.4.1. izmijenjene su i specifikacije za format potpisa ili pečata koje države članice trebaju upotrebljavati za potpisivanje ili pečaćenje svojih nacionalnih pouzdanih popisa.

(4) Provedbenu odluku Komisije (EU) 2015/1505 trebalo bi stoga izmijeniti kako bi upućivala na noviju verziju norme ETSI TS 119 612, 2.4.1. Zbog te su promjene potrebne i određene dodatne izmjene te provedbene odluke. Prvo, uz informacije koje treba navesti na pouzdanim popisima trebalo bi dati objašnjenja o tumačenju sadržaja tih popisa kako bi se pouzdajućim stranama omogućilo tumačenje informacija s pouzdanih popisa. Drugo, specifikacije koje se odnose na izradu elektroničkih potpisa ili pečata koji se stavljaju na pouzdane popise trebalo bi prilagoditi da se spriječe određene poznate i prijavljene ranjivosti.

(5) Kako bi pouzdajuće strane imale dovoljno vremena za prilagodbu specifikacijama iz Priloga, primjenu ove Odluke trebalo bi odgoditi.

([1]) SL L 257, 28.8.2014., str. 73., ELI: http://data.europa.eu/eli/reg/2014/910/oj.

([2]) Provedbena odluka Komisije (EU) 2015/1505 od 8. rujna 2015. o utvrđivanju tehničkih specifikacija i formata koji se odnose na pouzdane popise u skladu s člankom 22. stavkom 5. Uredbe (EU) br. 910/2014 Europskog parlamenta i Vijeća o elektroničkoj identifikaciji i uslugama povjerenja za elektroničke transakcije na unutarnjem tržištu (SL L 235, 9.9.2015., str. 26., ELI: http://data.europa.eu/eli/dec_impl/2015/1505/oj).

([3]) Uredba (EU) 2024/1183 Europskog parlamenta i Vijeća od 11. travnja 2024. o izmjeni Uredbe (EU) br. 910/2014 u pogledu uspostave europskog okvira za digitalni identitet (SL L, 2024/1183, 30.4.2024., ELI: http://data.europa.eu/eli/reg/2024/1183/oj).

(6) Na sve aktivnosti obrade osobnih podataka na temelju ove Odluke primjenjuju se Uredba (EU) 2016/679 Europskog parlamenta i Vijeća ([4]) i, prema potrebi, Direktiva 2002/58/EZ Europskog parlamenta i Vijeća ([5]).

(7) Provedeno je savjetovanje s Europskim nadzornikom za zaštitu podataka u skladu s člankom 42. stavkom 1. Uredbe (EU) 2018/1725 Europskog parlamenta i Vijeća ([6]) te je on dao mišljenje 8. kolovoza 2025. ([7]).

(8) Mjere predviđene u ovoj Odluci u skladu su s mišljenjem odbora osnovanog člankom 48. Uredbe (EU) br. 910/2014,

DONIJELA JE OVU ODLUKU:

Članak 1.

Prilog I. Provedbenoj odluci (EU) 2015/1505 mijenja se kako je navedeno u Prilogu ovoj Odluci.

Članak 2.

Ova Odluka stupa na snagu dvadesetog dana od dana objave u *Službenom listu Europske unije*.

Ova Provedbena odluka primjenjuje se od 29. travnja 2026.

Sastavljeno u Bruxellesu 27. listopada 2025.

Za Komisiju
Predsjednica
Ursula VON DER LEYEN

([4]) Uredba (EU) 2016/679 Europskog parlamenta i Vijeća od 27. travnja 2016. o zaštiti pojedinaca u vezi s obradom osobnih podataka i o slobodnom kretanju takvih podataka te o stavljanju izvan snage Direktive 95/46/EZ (Opća uredba o zaštiti podataka) (SL L 119, 4.5.2016., str. 1., ELI: http://data.europa.eu/eli/reg/2016/679/oj).

([5]) Direktiva 2002/58/EZ Europskog parlamenta i Vijeća od 12. srpnja 2002. o obradi osobnih podataka i zaštiti privatnosti u području elektroničkih komunikacija (Direktiva o privatnosti i elektroničkim komunikacijama) (SL L 201, 31.7.2002., str. 37., ELI: http://data.europa.eu/eli/dir/2002/58/oj).

([6]) Uredba (EU) 2018/1725 Europskog parlamenta i Vijeća od 23. listopada 2018. o zaštiti pojedinaca u vezi s obradom osobnih podataka u institucijama, tijelima, uredima i agencijama Unije i o slobodnom kretanju takvih podataka te o stavljanju izvan snage Uredbe (EZ) br. 45/2001 i Odluke br. 1247/2002/EZ (SL L 295, 21.11.2018., str. 39., ELI: http://data.europa.eu/eli/reg/2018/1725/oj).

([7]) Službeno očitovanje Europskog nadzornika za zaštitu podataka o nacrtu u pogledu verzije norme na kojoj se temelji zajednički predložak za pouzdane popiseEuropski nadzornik za zaštitu podataka.

PRILOG

Prilog I. Provedbenoj odluci (EU) 2015/1505 mijenja se kako slijedi:

1. U poglavlju II. prvi odlomak zamjenjuje se sljedećim:

   „U ovim specifikacijama koriste se specifikacije i zahtjevi iz norme ETSI TS 119 612 v2.4.1. (dalje u tekstu „ETSI TS 119 612").".

2. U poglavlju II. odjeljak pod naslovom „Vrsta programa/zajednica/pravila (Scheme type/community/rules) (točka 5.3.9.)" zamjenjuje se sljedećim:

„**Vrsta programa/zajednica/pravila (Scheme type/community/rules) (točka 5.3.9.)**

Polje je obvezno i mora biti u skladu sa specifikacijama iz točke 5.3.9. norme ETSI TS 119 612.

Polje uključuje samo URI-je na britanskom engleskom jeziku.

Polje uključuje najmanje dva URI-ja:

1. URI zajednički svim pouzdanim popisima država članica s upućivanjem na opisni tekst, koji vrijedi za sve pouzdane popise, kako slijedi:

   — URI: http://uri.etsi.org/TrstSvc/TrustedList/schemerules/EUcommon

   — Opisni tekst:

‚A. ***Participation in a scheme***

Each Member State must create a trusted list including information related to the qualified trust service providers that are under supervision, together with information related to the qualified trust services they provide, in accordance with the relevant provisions laid down in Regulation (EU) No 910/2014.

The present implementation of such trusted lists is also to be referred to in the list of links (pointers) towards each Member State's trusted list, compiled by the European Commission.

B. ***Policy/rules for the assessment of the listed services***

Member States must supervise qualified trust service providers established in the territory of the designating Member State as laid down in Chapter III of Regulation (EU) No 910/2014 to ensure that those qualified trust service providers and the qualified trust services they provide meet the requirements laid down in that Regulation.

The trusted lists of Member States include, as a minimum, information specified in Articles 1 and 2 of Implementing Decision (EU) 2015/1505.

The trusted lists include both current and historical information about the status of listed trust services.

Each Member State's trusted list must provide information on the national supervisory scheme and, where applicable, national approval, including through accreditation scheme(s) under which the trust service providers and the trust services they provide are listed.

C. ***Interpretation of the trusted list***

The general user guidelines for applications, services or products relying on a trusted list published in accordance with Regulation (EU) No 910/2014 are as follows:

C.1 ***Qualified status of a trust service***

The qualified status of a trust service is indicated by the combination of:

— the „Service type identifier" („Sti") value in a service entry;

— where applicable, the presence of one of the following values in all the fields „additionalServiceInformation extension" in the service entry:

   — http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/ForeSignatures}": further specifying the „Sti" identified service as being provided for electronic signatures;

   — http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/ForeSeals}": further specifying the „Sti" identified service as being provided for electronic seals; or

— http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/ForWebSiteAuthentication}": further specifying the „Sti" identified service as being provided for website authentication; and

— the status according to the „Service current status" field value as from the date indicated in the „Current status starting date and time".

Historical information about such a qualified status is similarly provided when applicable.

C.1.1 ***Service status under Regulation (EU) No 910/2014***

Including and after 1 July 2016 (UTC+2), the value of the „Service current status" field used by the Supervisory Body designated in a Member State to indicate that a trust service entry is representing a qualified trust service is the URI http://uri.etsi.org/TrstSvc/TrustedList/Svcstatus/granted".

C.1.2 ***Service status under Directive 1999/93/EC***

Strictly before 1st July 2016 (UTC+2), the value of the „Service current status" field used by the Supervisory Body designated in a Member State to indicate that a trust service entry is representing a certification-service-provider issuing qualified certificates is one of the following URIs:

— http://uri.etsi.org/TrstSvc/TrustedList/Svcstatus/undersupervision";

— http://uri.etsi.org/TrstSvc/TrustedList/Svcstatus/supervisionincessation"; or

— http://uri.etsi.org/TrstSvc/TrustedList/Svcstatus/accredited".

C.2 ***Qualified status of a certificate***

Regarding qualified trust service providers issuing qualified certificates for electronic signatures, for electronic seals and/or for website authentication, a „CA/QC" „Service type identifier" („Sti") entry indicates that any end-entity certificate issued by or under the CA represented by the CA's public key and CA's name (both CA data to be considered as trust anchor input) present in the „Service digital identifier" („Sdi"), is or was a qualified certificate (QC) at a certain date and time provided that the trust service entry indicates a granted qualified status (see clause C.1) and that the below requirements are met with reference to that date and time.

C.2.1 ***Default rules***

C.2.1.1 *Certificate status standardised rule*

The end-entity certificate contains the ETSI standardised QcStatements extension as specified in standard ETSI EN 319 412-5 with the following requirements:

— the id-etsi-qcs-QcCompliance (urn:oid:0.4.0.1862.1.1) QcStatement is present; and

— where present, the id-etsi-qcs-QcType (urn:oid:0.4.0.1862.1.6) QcStatement contains exactly one of the following values:

  — the id-etsi-qct-esign (urn:oid:0.4.0.1862.6.1) ETSI defined QC type identifier;

  — the id-etsi-qct-eseal (urn:oid:0.4.0.1862.6.2) ETSI defined QC type identifier; or

  — the id-etsi-qct-web (urn:oid:0.4.0.1862.6.3) ETSI defined QC type identifier.

Optionally, the id-etsi-qct-QcSSCD (urn:oid:0.4.0.1862.4) QcStatement may be present.

C.2.1.2 *Certificate status under Directive 1999/93/EC*

Restricted to the context of Directive 1999/93/EC and as a legacy alternative to the above standardised rule, the end-entity certificate contains:

— the ETSI standardised QcStatements extension (as specified in ETSI EN 319 412-5) with the id-etsi-qcs-QcCompliance (urn:oid:0.4.0.1862.1.1) QcStatement being present;

— the legacy QCP+ (urn:oid:0.4.0.1456.1.1) ETSI defined certificate policy OID; or

— the legacy QCP (urn:oid:0.4.0.1456.1.2) ETSI defined certificate policy OID.

C.2.2 ***Additional rules: Presence of Qualifications Extension***

If „Sie" „Qualifications Extension" information as specified in clause 5.5.9.2 of standard ETSI TS 119 612 is present, then in addition to the above default rules, those certificates that are identified through the use of „Sie" „Qualifications Extension" information must be considered according to the associated qualifiers. Those qualifiers are used when necessary to compensate for a lack of standardised machine processable information in the corresponding certificate content. They are not to be used to compensate for a lack of machine processable information in certificates issued after 1 July 2016 where that lack would result in a non-compliance with Annex I, III or IV of Regulation (EU) No 910/2014. However, they can be used to provide further machine processable information when the information provided in the certificate, while compliant with the Regulation, does not align with the above default interpretation rules. Where used, they provide additional information regarding:

— their qualified status:

  — „QCStatement" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCStatement}") meaning the identified certificates are qualified under Directive 1999/93/EC or under Regulation (EU) No 910/2014; or

  — „NotQualified" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/NotQualified}") meaning the identified certificates are not to be considered as qualified.

— the nature of their qualification:

  — „QCForESig" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCForESig}") meaning the identified certificates, when claimed or stated as qualified, are qualified certificates for electronic signature under Regulation (EU) No 910/2014;

  — „QCForESeal" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCForESeal}") meaning the identified certificates, when claimed or stated as qualified, are qualified certificates for electronic seal under Regulation (EU) No 910/2014; or

  — „QCForWSA" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCForWSA}") meaning the identified certificates, when claimed or stated as qualified, are qualified certificates for website authentication under Regulation (EU) No 910/2014.

— whether or not the private key resides in a qualified signature or qualified seal creation device (QSCD) and the nature thereof:

  — „QCWithQSCD" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCWithQSCD}") meaning the identified certificates, when claimed or stated as qualified, have their private key residing in a QSCD;

  — „QCNoQSCD" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCNoQSCD}") meaning the identified certificates, when claimed or stated as qualified, have not their private key residing in a QSCD;

  — „QCQSCDStatusAsInCert" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCQSCDStatusAsInCert}") meaning the identified certificates, when claimed or stated as qualified, do contain proper machine processable information about whether or not their private key is residing in a QSCD; or

  — „QCQSCDManagedOnBehalf" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCQSCDManagedOnBehalf}") meaning the identified certificates, when they are claimed or stated as qualified, have their private key is residing in a QSCD for which the generation and management of that private key is done by a qualified TSP on behalf of the entity whose identity is certified in the certificate;

Restricted to the context of certificates issued under Directive 1999/93/EC, the following qualifiers are defined and provide additional information regarding:

— whether or not the private key resides in a secure signature creation device (SSCD):

  — „QCWithSSCD" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCWithSSCD}") meaning the identified certificates, when claimed or stated as qualified, have their private key residing in an SSCD;

  — „QCNoSSCD" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCNoSSCD}") meaning the identified certificates, when claimed or stated as qualified, do not have their private key residing in an SSCD; or

  — „QCSSCDStatusAsInCert" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCSSCDStatusAsInCert}") meaning the identified certificates, when claimed or stated as qualified, do contain proper machine processable information about whether or not their private key is residing in an SSCD.

— the issuance to a Legal Person:

  — „QCForLegalPerson" http://uri.etsi.org/TrstSvc/TrustedList/SvcInfoExt/QCForLegalPerson}") meaning the identified certificates, when claimed or stated as qualified, are issued to a Legal Person under Directive 1999/93/EC.

Note: The information provided in the trusted list is to be considered as accurate meaning that the certificate is not to be considered as qualified if the end-entity certificate does not follow any of the default rules defined above, and:

  — if no „Sie" „Qualifications Extension" information is present for the trust anchor CA/QC corresponding service entry to qualify the certificate with a „QCStatement" qualifier, or

  — a „Sie" „Qualifications Extension" information is present for the trust anchor CA/QC corresponding service entry to qualify the certificate with a „NotQualified" qualifier.

C.3 ***Trust anchors***

„Service digital identifiers" are to be used as Trust Anchors in the context of validating electronic signatures or seals for which signer's or seal creator's certificate is to be validated against information in the trusted list, hence only the public key and the associated subject name are needed as Trust Anchor information. When more than one certificate represents the public key identifying the service, they are to be considered as Trust Anchor certificates conveying identical information with regard to the information strictly required as Trust Anchor information.

C.4 ***General rule for the interpretation of trust service entries***

The general rule for interpretation of any „Sti" type entry, possibly further specified through a „Sie" „additionalServiceInformation", not corresponding to qualified trust services is that, for that „Sti" identified service type, and possibly in combination with a „Sie" „additionalServiceInformation" URI, the listed service named according to the „Service name" field value and uniquely identified by the „Service digital identity" field value has the current approval status according to the „Service current status" field value as from the date indicated in the „Current status starting date and time".

Specific interpretation rules for any additional information with regard to a listed service (e.g. „Service information extensions" field) may be found, when applicable, in the Member State specific URI as part of the present „Scheme type/community/rules" field.

Please refer to the implementing acts adopted pursuant to Article 22(5) of Regulation (EU) No 910/2014 for further details on the specifications of the fields of the Member States' trusted lists.'

2. A URI specific to each Member State's trusted list pointing towards a descriptive text that shall be applicable to this Member State trusted list:

   (a) http://uri.etsi.org/TrstSvc/TrustedList/schemerules/CC where CC = the ISO 3166-1 ([1]) alpha-2 Country Code used in the ‚Scheme territory' field (clause 5.3.10)

   — where users can obtain the referenced Member State's specific policies/rules against which trust services included in the list are assessed, in compliance with the Member State's supervisory regime and where applicable, approval scheme.

   — where users can obtain a referenced Member State's specific description about how to use and interpret the content of the trusted list with regard to the listed non-qualified trust services and/or to nationally defined trust services. This may be used to indicate a potential granularity in the national approval system related to CSPs / TSPs not issuing QCs and how the ‚Scheme service definition URI' (clause 5.5.6) and the ‚Service information extension' field (clause 5.5.9) are used for this purpose.

   (b) Member States may define and use additional URIs expanding the above Member State specific URI (i.e. URIs defined from this hierarchical specific URI).'"

3. U poglavlju II. nakon odjeljka pod naslovom „Trenutačni status usluge (Service current status) (točka 5.5.4.)" dodaje se sljedeći odjeljak:

„**Element Signature (točka B.1.), Općenito (točka B.1.0.)**

Odredba je obvezna i mora biti u skladu sa specifikacijama iz točke B.1.0. norme TS 119 612, pri čemu se točka 2. zamjenjuje sljedećim:

‚2. Njegov element ds:SignedInfo sadržava element ds:Reference s atributom URI postavljenim na prazan niz (tj. URI=""), tako da se odnosi na cijeli dokument. Taj element ds:Reference mora ispunjavati sljedeće zahtjeve:

   (a) sadržava samo jedan element ds:Transforms;

   (b) taj element ds:Transforms sadržava dva elementa ds:Transform. Prvi će biti onaj čiji atribut Algorithm označuje obuhvaćenu transformaciju s vrijednošću: ‚http://www.w3.org/2000/09/xmldsig#enveloped-signature'. Drugi će biti onaj čiji atribut Algorithm daje naredbu za obavljanje ekskluzivne kanonikalizacije ‚http://www.w3.org/2001/10/xml-exc-c14n#'."'

([1]) ISO 3166-1:2006: ‚Codes for the representation of names of countries and their subdivisions Part 1: Country codes'.