

POSITION | DIGITAL POLICY | E-GOVERNMENT

EU Business Wallet

Contribution to the European Commission's call for evidence

12 June 2025

Reducing the bureaucratic burden and streamlining the EU's rulebook have the potential to unleash Europe's innovation potential, and thereby, enhancing the EU's long-term competitiveness. Since businesses have on average 200 contacts with the public administration per year and have to fulfil an ever-increasing amount of reporting obligations – not least due to EU legislation – an EU Business Wallet as part of a full-fledged EU digital identity framework can facilitate the interactions between businesses and governments (B2G) as well as between businesses (B2B). The EU Business Wallet will provide organisations with a verified digital business identity. To achieve a uniform digital organisational identity, it should be possible to create digital, verifiable proofs of corporate identity and associated authorisations that a company can use in a variety of application scenarios, such as when opening bank accounts, issuing and managing digital product passports (DPPs) and in Industry 4.0 applications, such as data spaces. It would also facilitate the automation of compliance processes, for example, in export controls for dual-use goods or the secure exchange of critical infrastructure data in sectors, such as banking, transport and energy.

As business wallets are used to manage identity data for legal entities, such as companies and organisations, they must support the management of a variety of business-related credentials, including business licences, compliance certificates, powers of attorney and contracts. For companies operating in various EU Member States, a single EU business wallet entails the possibility to end the necessity to report certain information, such as cybersecurity incidents under the NIS 2 Directive, in each country separately, since a business wallet would facilitate information exchange between EU Member States.

The eIDAS Regulation already requires a mandatory European Identity Wallet for legal entities, but the implementation has so far only provided rudimentary details regarding legal entities, particularly within the implementing acts, for example through incomplete definitions of the composition, issuance and other special requirements for the Person Identification Data (PID) for legal entities. In our opinion, this should be addressed first and foremost. However, existing gaps should always be closed directly within the existing legal acts in order to avoid fragmentation of governance.

One the following pages, BDI outlines its policy recommendations for measures to be taken at European and national level and proposes practical considerations for the implementation of the EU Business Wallet.

German industry's policy recommendations

To ensure that businesses can reap the full benefits of the EU Business Wallet, German industry urges the European Commission and Member States to consider the following recommendations when developing the EU Business Wallet:

@EU-level

- **Defining an organisation's identity:** A major challenge in the implementation of organisational identities is the definition of the organisational identity itself. From a regulatory point of view, it would have to be clarified whether this is an eID, as in the case of a natural person, or an extract from the commercial register. In the case of an eID, each government would have to define and notify its own eID scheme, as is already the case in some European Member States. If it is a register extract, for example from the commercial register, the organisational identity would be a so-called (qualified) electronic attribute certificate and would be issued by public or private (qualified) trust service providers. Furthermore, the source of the organisation identity must be defined: either at national level (e.g. in Germany the basic register¹ or the commercial register) or for globally operating companies, non-governmental sources, such as the Global Legal Entity Identifier Foundation (GLEIF).
- **Interlink the EU Business Wallet with digital public services:** Companies will only be able to harness the full potential of the EU Business Wallet at EU-level, if the European Commission together with all EU agencies and Member States will ensure that all EU funding application processes, reporting obligations and other public services relevant for businesses utilise the EU Business Wallet as the default mechanism to verify a business' identity both at EU and national level.
- **Closely intertwine the EU Business Wallet with the Digital Product Passport (DPP):** Within the framework of the Ecodesign for Sustainable Products Regulation (and potentially other legal acts in future), the EU aspires to introduce a Digital Product Passport (DPP). The EU Business Wallet will be a crucial enabler of the DPP. Organisational identities are the key to the trustworthy implementation of the DPP. The companies within the supply chain in which the product is manufactured are uniquely identified by their organisation's ID. This is stored in the business wallet of the respective organisation. The individual parts created in the development cycle are successively added to the DPP as small (qualified) electronic attribute certificates for each product step, i.e. an entire folder. Hence, the EU Business Wallet should be closely interlinked with the DPP and should function as a trust layer guaranteeing that all information within the DPP is correct and has been inserted by authorised employees from the respective producer.

@Member State-level

- **Speed up the modernisation of public registers:** The German administration operates more than 375 registers – i.e. databases or systematic collections of information – for the provision of administrative services. At the same time, citizens and companies have to enter even rudimentary data – such as the company name, the type of company or its registered office – in new forms every time they interact with a public authority. The current lack of digital usability of data stored in registers through a concerted modernisation and consolidation of the German register landscape is slowing down administrative digitalisation and significantly increases the

¹ Cf. Germany's basic register: https://www.destatis.de/Verwaltungsregister/DE/Basisregister/_inhalt.html

administrative burden for companies. In Germany, the “Basisregister” is already collecting data from different registers to set up the “central register”. This process should be accelerated.

- **Integrate existing national solutions into the EU Business Wallet:** The EU Business Wallet (EUBW) should be a unified framework for identity and trust, replacing siloed, inconsistent systems existing with the EU 27. For example, in Germany, companies have to separately register for public organisational accounts in each region (i.e. Land) and for the federal solution, resulting in significant bureaucratic costs as credentials and user roles have to be kept updated for each organisation account. This situation is multiplied by each EU Member State in which a company is doing business. It is of paramount importance that the EU Business Wallet does not further amplify the existing hotchpotch of organisation accounts, registration methods and wallets but rather leads to an EU-wide consolidation of such solutions. The rights and role management, which allows the legal person to manage the operation of the Business Wallet independently and in a differentiated manner through self-administration in order to avoid complex proofs of representation or the maintenance of public lists of mandates, is of utmost importance for German industry. This should be achieved by allowing and enabling the transfer of a company's existing rights and role management concepts within the EUBW.
- **Provide administrative services digitally:** To leverage the full potential of the EU Business Wallet in terms of a comprehensive reduction in bureaucracy, it is necessary that all EU Member States realise an end-to-end digital availability of all administrative services relevant to businesses. This includes all administrative services with high frequency and fast response cycles, all tax and registration matters, submission of permit applications, trade tax notices, applications for funding programmes and many more.

Practical considerations for the implementation of the EU Business Wallet

- **Closely involve businesses in the development of the EU Business Wallet:** German industry highly appreciates the EU Commission's involvement of industry as part of the impact assessment. Nonetheless, we want to stress that this should not be a one-off. Rather, to ensure that the EU Business Wallet can be seamlessly integrated in business processes and also fulfils businesses' requirements in terms of data protection and cybersecurity, industry should be closely involved in its development and implementation.
- **Ensure data privacy and security:** Since business data are highly sensitive, the EU must ensure a very high level of data protection. Thus, robust encryption and state-of-the-art cybersecurity measures are crucial features of the EU Business Wallet. Ideally, the wallet would be operated by a qualified trust service provider (QTSP) or meet the general criteria under Article 24 of the eIDAS Regulation. This is particularly important to establish the necessary trust in the wallet.
- **Ensure secure authentication and authorisation:** Regulation (EU) 2023/2854 (Data Act) grants users the right to access and share data generated by connected products. Article 4 obliges data holders to provide this access. In this respect the EUBW should support secure authentication and authorisation, helping businesses to exercise their data access rights and comply with these obligations.
- **Enable utilisation of EUDI wallets of individuals in business contexts:** Individuals must be able to use their wallets in the corporate context, e.g. to prove ownership of authorisations within the organisation. Henceforth, the EU Business Wallet must be interoperable with the EU

Digital Identity for natural persons developed within the framework of eIDAS. In addition, a clear identification of natural persons acting on behalf of legal entities is vital for contract law.

- **Ensure usability for all companies:** To reap the full benefit of the EU Business Wallet, both small and medium enterprises as well as multinational corporations must be able to utilise it and must find useful public services connected to the EU Business Wallet.
- **Ensure delegation of rights as well as user and permission management:** The delegation of authorisations and the establishment of proxy authorisations is a central function of the organisational wallet, as many different employees within a company act on behalf of a company. This enables certain employees to act on behalf of the organisation based on the rights assigned to them. The EU must ensure that the EU Business Wallet provides for the delegation of authorisations within the framework of a comprehensive management of permissions and user roles. Therefore, the EU Business Wallet's user management system must allow multiple members of the organisation to receive, store and present these credentials when required.
- **Ensure interoperability and API integration:** To ensure that the range of application scenarios for which the EU Business Wallet can be enlarged, API integrations to enable automation and machine-to-machine data exchanges are crucial. For example, it should be possible to grant enterprise systems, such as ERP, direct access to wallet data for automated processes such as compliance checks or the management of data necessary for the Digital Product Passport.

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