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SESSION 3 · CROSS-OVER REGULATIONS

# Beyond eIDAS

How the EU's trust-service layer became critical infrastructure for a dozen other regulations.

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## SESSION 3 · CROSS-OVER REGULATIONS

# The crossover isn't *between* the rulebooks — it's underneath them.

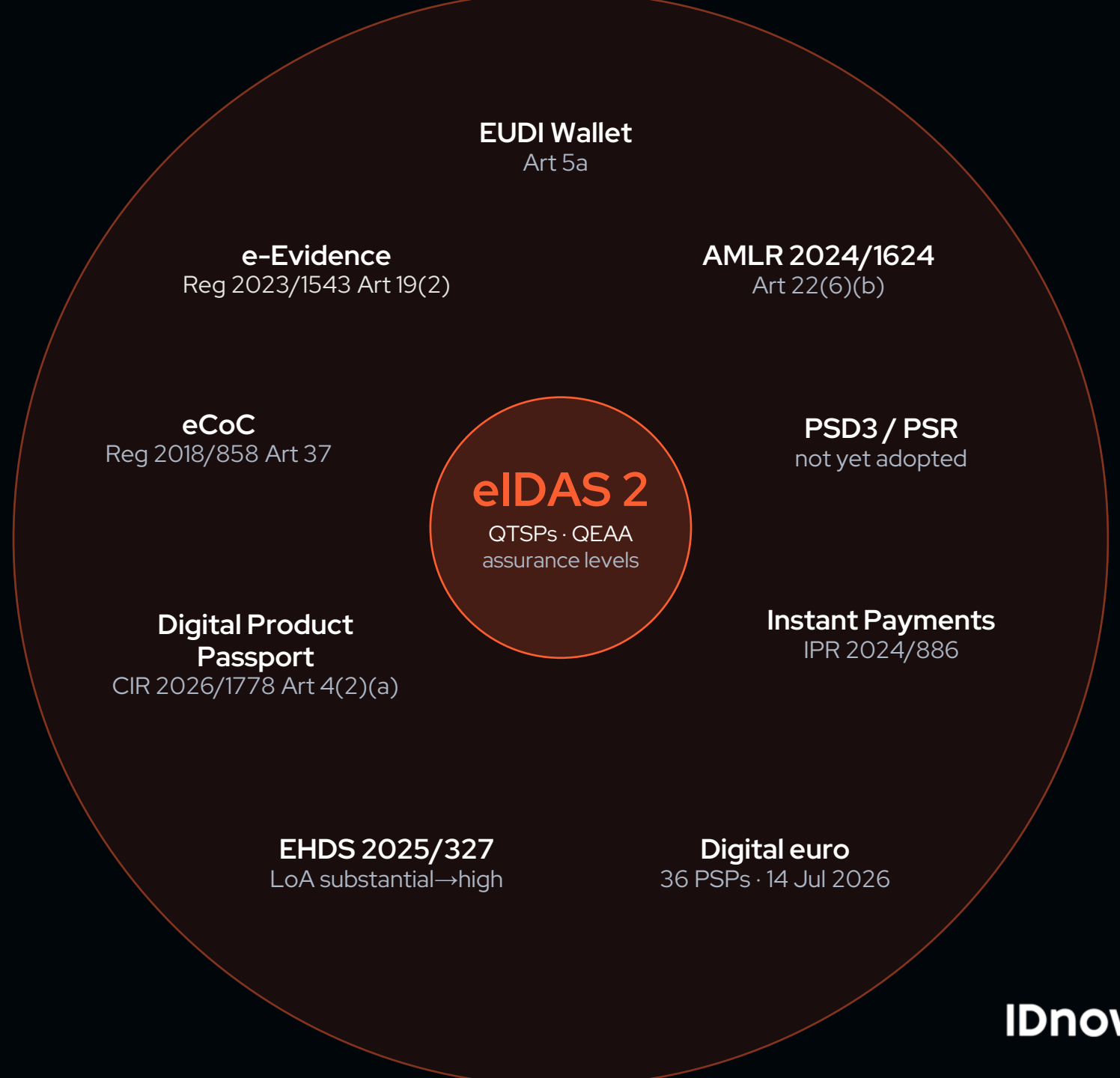
Over eighteen months, eIDAS stopped being a law about signatures and seals. It became **the trust layer** — the one horizontal place in Union law that defines binding a verified attribute to a person, at a known level of assurance.

## THE DEPENDENCY

# One trust layer, nine regimes bolted to it

Outer ring: CRA · DSA Art 28 age  
verification · European Business  
Wallet · CADA

**The crossover here is:** *nine  
regimes, one dependency – they all  
reduce to the same trust primitive,  
and all point at eIDAS.*



## THE SAME PRIMITIVE

# Sectoral laws don't redefine identity – they import it

Bind a verified attribute to a subject, at a known level of assurance, so a third party can audit it.

Four of the instruments eIDAS defines for that one operation – *not the whole catalogue*:

### Art 8

assurance levels – substantial / high

### QEAA

qualified electronic attestation of attributes

### Signatures & seals

Art 26 / 38 – advanced signatures, qualified seals

### QWAC

Annex IV – qualified website authentication

**The crossover here is:** *sectoral laws don't redefine identity – they import Article 8.*

# Four payment rulebooks, four clocks, one primitive

## AMLR (EU) 2024/1624 · Art 22(6)

Verify by document OR eID at LoA substantial/high – AND relevant qualified trust services. Applies 10 Jul 2027 (exception 10 Jul 2029). **Recital 66 frames QTS as fallback** – conjunction unresolved.

## Instant Payments · IPR 2024/886

Verification of Payee: euro-area PSPs since 9 Oct 2025; non-euro-area 9 Jul 2027.

## PSD3 / PSR

Political agreement Nov 2025; not yet adopted. PSR applies ~21 months after entry into force; matching-verification & liability (Arts 50, 57) ~27 months. Offsets only – no calendar dates.

## Digital euro

EP mandate 9 Jul 2026; 36 PSPs selected for the pilot 14 Jul 2026; pilot H2 2027; potential first issuance during 2029.

**The crossover here is:** *four payment rulebooks, four clocks, one identity primitive underneath.*

# Product law wired itself to eIDAS – twice

## Digital Product Passport

CIR (EU) 2026/1778 · in force 6 Aug 2026

- Art 4(1)(a) / 5(1)(a): natural persons & sole traders – a **qualified electronic signature + qualified certificate** (or eID at 'high', or a QEAA)
- Art 4(2)(a) / 5(2): legal persons – a **qualified electronic seal + qualified certificate from a QTSP**
- Art 4(2)(b): operators not required to be EU-established need only an **unqualified attestation** – a higher bar on European operators than foreign ones
- Art 9(3): proof of registration guaranteed by a **qualified seal** (Art 38)

## electronic Certificate of Conformity

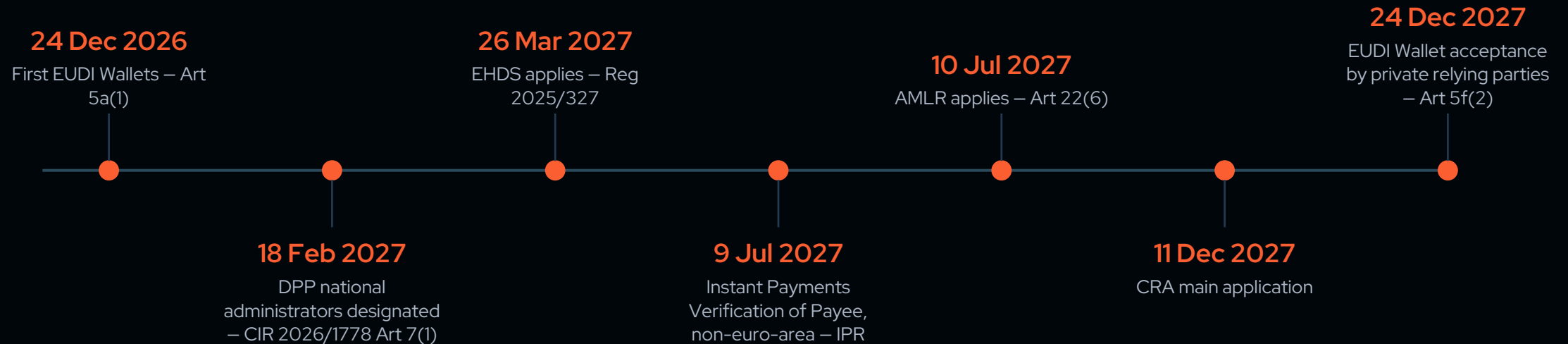
Reg (EU) 2018/858 · Art 37 · mandatory 5 Jul 2026

- Base regulation: CoC as structured electronic data; authenticity 'such as the use of **digital signature**' (Art 37(8)(b)) – no eIDAS specifics in the base text
- Implementing act CIR (EU) 2024/1061 supplies them: an **advanced electronic signature** (Art 26, XAdES) over EUCARIS endpoints on a QWAC (Annex IV) – the QTSP-only dependency
- Transitional backstop to 29 Nov 2026 (Art 37(10)) – a transitional arrangement, never a statutory deadline
- Applies to non-EU producers selling into the single market

**The crossover here is:** *a non-EU carmaker now depends on an EU trust service to register a car.*

## THE 2027 PILE-UP

# The dependencies land in one narrow window



Seven binding go-lives, ~12 months, one trust layer. *The last date is arithmetic on a statutory 36-month period – and no EU institution has ever printed it.*

**The crossover here is:** *the dependencies don't arrive spread out – they land in one window, all on the same layer.*

THE LIST IS FANNING OUT – CAN ITS AUDIT KEEP UP?

# The list is growing faster than the capacity to audit it

## NEW ON THE TRUSTED LIST – 2026

- › **Age-verification list, live Jul 2026** first entry Denmark's AltID (X.509 proof-of-age); the DSA age-assurance blueprint now hangs off trusted-list infrastructure
- › **Wallet actors on the eIDAS Dashboard** PID, Wallet & WRPAC providers, Registrars, Registers – operated by DG DIGIT + DG CNECT
- › **TLv6 format migration** hard deadline 28 Apr 2026, on the ecosystem's most load-bearing artefact
- › **LOTL reaches third countries** trusted-list AdES scheme now extends to Moldova & Ukraine

## CAPACITY TO AUDIT IT

253 : 29 : 0

253 active QTSPs · 29 countries

29 conformity-assessment bodies · notified by 10 of 27 Member States

0 CABs to audit the services eIDAS 2 created – QEAA, qualified archiving, ledgers – though a QEAA service is already live (Microsec HU, DigitalSign PT, IDnow TS SE), a QEAarch (Entaksi)

Audit cadence: Art 20(1), every 24 months, now carrying NIS2 Art 21. CRA notified bodies: 0, two months after Chapter IV applied.

The crossover here is: *the list keeps adding service types.*

## FOUR COLLISIONS WORTH NAMING

# The ambiguity lives in the seam

The menu these regimes draw from – **QES · QESeal · QWAC · QTS · QERDS · QEAA**, plus EUDI Wallet / eID at LoA 'high'. Each regime picks a different subset.

### 1 The AML conjunction

Art 22(6)(b): eID 'substantial'/'high' AND qualified trust services – but recital 66 frames QTS as a fallback. **Cumulative or alternative?** Both defensible. The draft CDD RTS seals **no qualified primitive onto the evidence (Art 7(2))**. Binds every bank 10 Jul 2027; the RTS due 10 Jul 2026 isn't adopted.

### 2 The e-Evidence seam

Same layer, opposite demand. Reg 2023/1543 Art 19(2): a document needing a seal or signature 'shall feature a qualified electronic seal or qualified electronic signature' – non-negotiable, from 18 Aug 2026. The **financial stack asks for none**: DORA is ICT-risk; PSD2 is SCA; the AML draft leans on eID + remote proofing.

### 3 The DPP asymmetry

CIR 2026/1778 Art 4(2)(a): qualified e-seal / QEAA for EU operators. Art 4(2)(b): an **unqualified attestation for operators outside the Union**. Product law asks more of European operators than of foreign ones. Why?

### 4 The post-quantum clock

NIS Cooperation Group roadmap – Milestone 1, 31 Dec 2026 – is not law. eIDAS Art 5c(4) caps wallet certification at five years, vulnerability-assessed every two. A wallet certified Dec 2026 carries its certificate to ~2031 – past the roadmap. Whose **audit cycle** absorbs the migration?

**The crossover here is:** same nine-item menu, four different orders – the seams between rulebooks are where ambiguity lives.

THE ASK

# eIDAS is no longer a **signature law**.

It is the horizontal trust layer that payments, AML, health, product law and vehicle type-approval now build on – and it is still regulated, audited and resourced as if it were a signature law.

**The ask:** treat the trust-service layer as critical infrastructure, because a dozen other regimes already do.