

The future of ERDS in the context of the European Business Wallet

Registered delivery as the legal communication channel of the wallet

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Small Business Standards

The Business Wallet regulation: where we stand

November 2025	Commission proposal
June 2026	Council general approach
September 2026	Parliament mandate (ITRE vote, 10 September)
Next	Trilogue: the three texts differ on the registered delivery channel



Two functions of the Business Wallet, one channel with legal effect

1. Identify the legal person

Company identity and attestations of attributes, presented to registers, authorities and business partners.

What is in the wallet.

2. Communicate with proof

Qualified electronic registered delivery (QERDS): proof of sending and receipt, identified parties, certified time.

How the wallet delivers with legal effect.



The channel: four principles the trilogue has to settle

Open to many providers

Common requirements and a standard interface, not a single designated service.

Interoperable by law

Wallets and registered delivery services must interoperate; today this is left to agreements between providers.

Established in the Union

Providers and data under EU jurisdiction.

One transition for national systems

Existing national channels converge on the qualified service instead of coexisting with it.

“Use Europe as one market, and not 27 markets connected by APIs.”

Aura Salla, MEP (ITRE), 10 September 2026



The technical baseline already exists





One implementing act,

two instruments

Implementing Regulation (EU) 2025/1944 (Article 44 eIDAS)

Annex I: presumption of compliance - Art. 44(1a) and (2)

Standard ETSI EN 319 521 (with adaptations). A service that meets it is presumed to meet the legal requirements of article 44(1); other ways remain possible.

Annex II: interoperability, Art. 44(2a) and (2b)

Standards ETSI EN 319 522 (series). Reference for the interoperability framework, which eIDAS leaves voluntary; no presumption.

What the Business Wallet regulation changes

Interoperability between wallets and registered delivery services becomes an essential part.

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The standards are being revised

- EN 319 521, policy and security requirements: aligned with the adaptations of the implementing regulation; absorbs the registered e-mail policy standard (EN 319 531)
- EN 319 522-1, framework: descriptive only; requirements moved to the other parts; mapping to eIDAS and its implementing acts
- EN 319 522-2, semantic contents: single repository of requirements; separate conformance for standalone and interoperating services
- EN 319 522-3, formats: new interoperability clause
- EN 319 522-4, bindings: current cryptography (elliptic curves) and crypto agility; updated capability discovery
- Approval for the European standard procedure planned by end 2026

New versions expected in 2027



Why it matters for small businesses





2.5% of turnover:

what regulatory

compliance costs

a smaller company

Digital cuts compliance costs only if identity and channel are built once

The cost today

- Regulatory compliance: 2.5% of turnover for smaller companies, 1.8% on average (European Investment Bank, cited in EP press release, 10.9.2026)
- About one fifth of staff time absorbed by compliance (COM(2025) 838, explanatory memorandum)
- Tax compliance, relative to turnover: about ten times more for SMEs than for large companies (EC study Tax compliance costs for SMEs, 2022)

What the two functions give a small firm

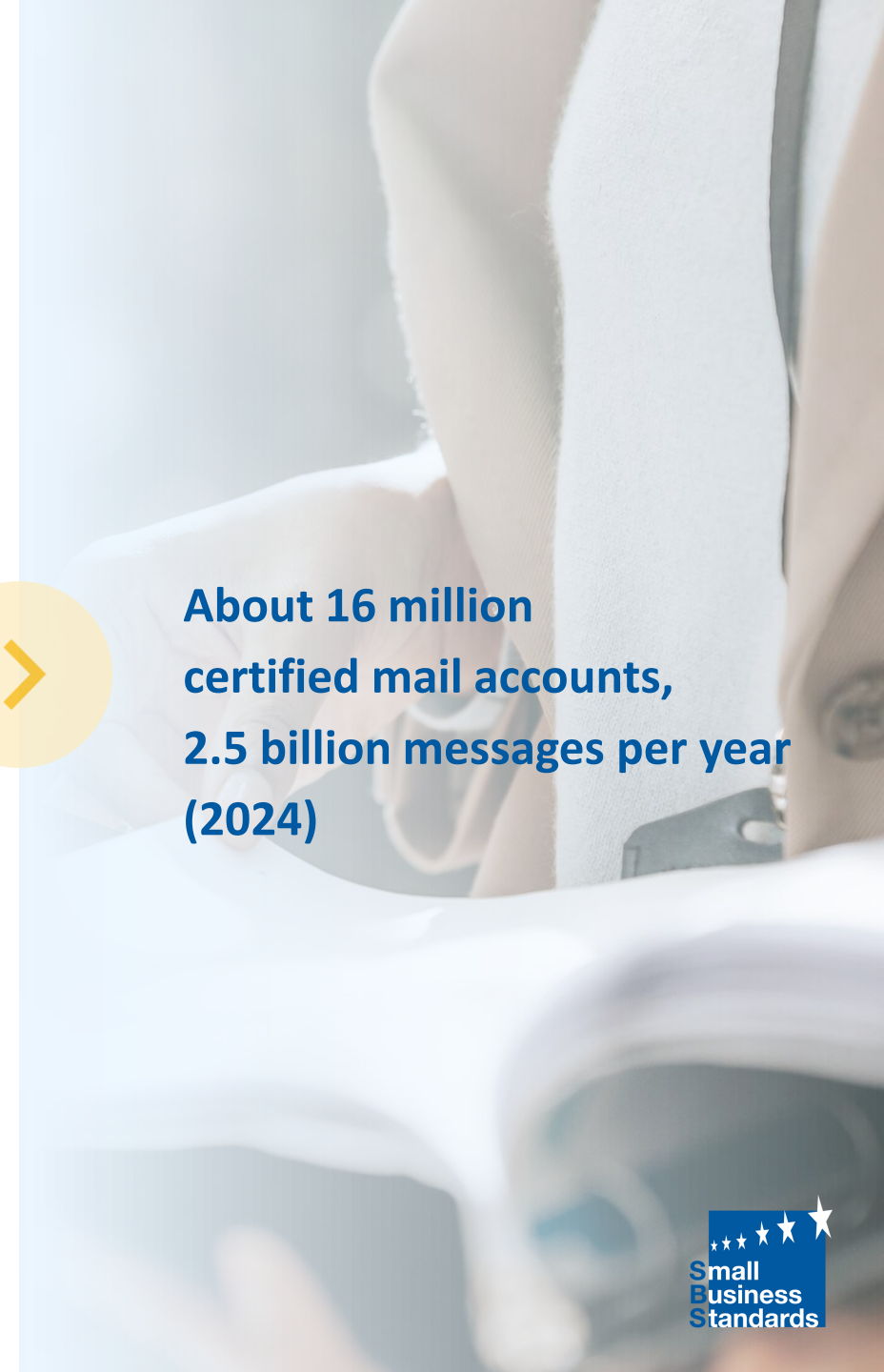
- Identification: one credential, reused across registers and procedures
- Registered delivery: proof by law (Art. 43(2) eIDAS), no alternative evidence of sending, receipt and time
- Also for sole traders and the self-employed, at affordable prices (COM(2025) 838, recital 12)

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Italy: a legal channel at national scale

- Certified e-mail (PEC) predates eIDAS: a national registered e-mail with legal effect, offered as basic infrastructure at low cost
- Used by every company and professional for communications with authorities, courts and counterparties
- Estimated net benefit for the country: about EUR 3.5 billion over 2008-2022 (industry estimate)
- Now migrating to the qualified registered delivery service: the national channel becomes a European one

About 16 million certified mail accounts, 2.5 billion messages per year (2024)



Beyond eIDAS: procurement, product passports, VAT

What the other dossiers say

- Public Procurement Act proposal (2026): the wallet as a business credential tool, EU-wide by mid-2028; nothing on registered delivery for tenders and award notices
- Product passport (2024) and VAT in the Digital Age (2025): adopted before the proposal, no reference to the wallet

What the Business Wallet negotiation says

- Commission: verifiable exchange of VAT attestations and transaction data
- Parliament: access to product passport data; exchange of e-invoices, in particular for SMEs

Parliament: the wallet “should function as an interoperable unifying architectural layer rather than an additional platform”. The other dossiers take no such position.

For small businesses the desirable outcome is one tool: one identity, one channel with legal effect.



Identity and channel built once, reused everywhere

- The technical baseline exists: eIDAS, the implementing regulation, the ETSI standards under revision
- The trilogue decides who provides the channel, where it lives and how national systems converge
- Other dossiers are choosing between reuse and duplication now, without waiting for this one
- **For small businesses: one identity, one channel with legal effect, at affordable prices**





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THANK YOU

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