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From Compliance to Confidence:

Auditing Trust Services in the EUDI Wallet Ecosystem.



Trust Service Certification | CA Day 2026 | 16.09.2026

The Weight of the New Rules

My Home Office before eIDAS 2



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The Weight of the New Rules

My Home Office after eIDAS 2



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Who certifies trust?



How do all the requirements become auditable?



Compliance to Confidence: Is it possible?

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Who certifies Trust?

Who certifies Trust in the EUDI Wallet Ecosystem?

Accredited Conformity Assessment Body (CAB) to certify Trust Service Providers

- (Q) Trust Service Provider
- Wallet Provider
- PID Provider
- Provider for Access- & Registration Certificates
- PubEAA Provider
- Identity Proofing Provider
- Intermediaries
- ...

LABORATORIES

Certification of Hard- & Software:

- QSCD/SSCD
- HSM
- Secure Element
- Wallet SCA
- Wallet SCD
- ...

Biometric testing:

- Presentation Attack Detection
- Injection Attack Detection
- ...

PROVIDER SELF-TESTS

Self-tests:

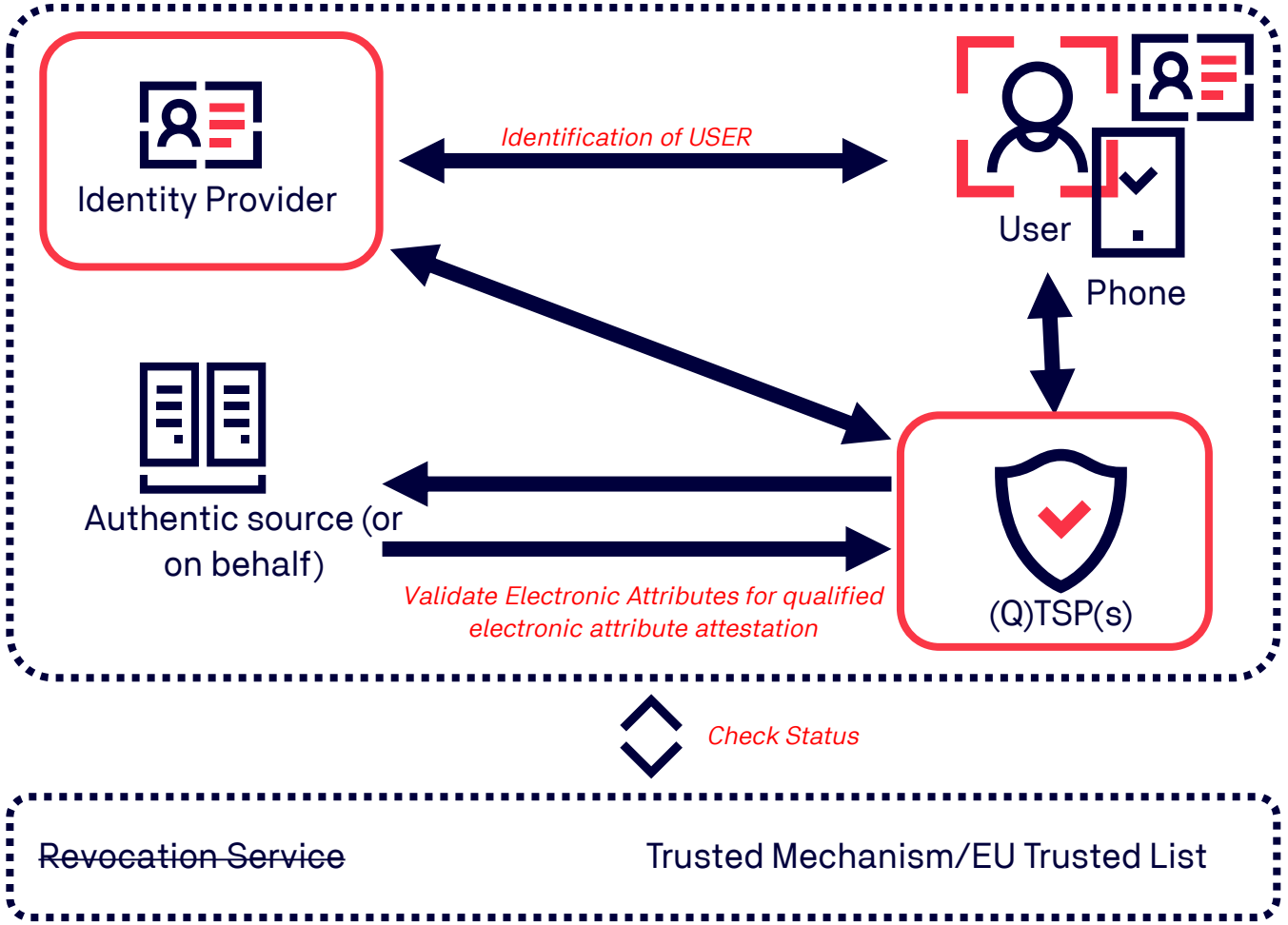
- Functional Conformity Assessment (FCAF)
- biometric performance testing

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How do broad legal obligations become clear & auditable?

Example Use Case (1/3) | use case definition

- Qualified Trust Service Provider (QTSP)
- Trust Service: Qualified attestation of attributes (QEAA):
  - Without using EUID Wallet
  - Use of an authentic source
  - Use an identity provider for identification of natural person
  - Short Time EAA (24h), no revocation
- Identity Proofing:
  - using an identity document for unattended remote identity proofing
  - Extended LoIP



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How do broad legal obligations become clear & auditable?

Example Use Case (2/3) | selective reading

EU LAW



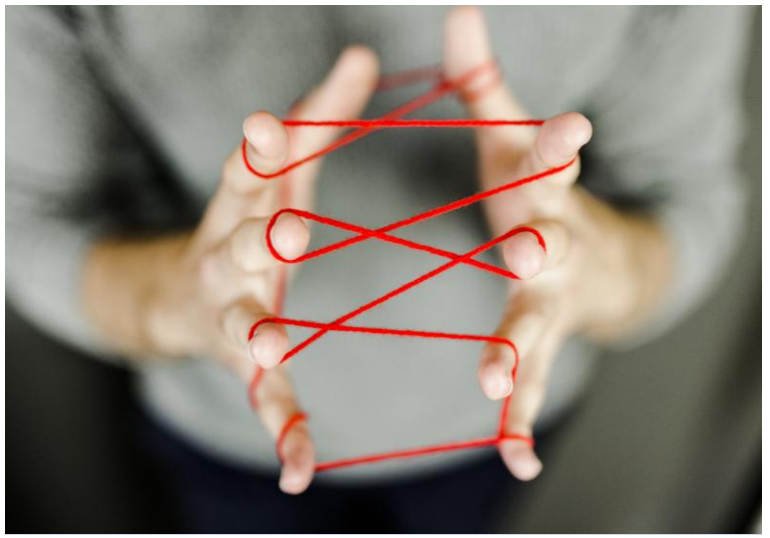
- eIDAS
- NIS2
- Commission Implementing Regulation (CIR)

National Law



- National law to define responsible supervisory bodies, specific details & national schema ...
- How to handle NIS2 requirements (not covered by ETSI 319 401 V3.2.1)

Standards



- Reference Standards (could be adapted by CIR)
- May be further referenced standards & evaluation requirements, for example for key management and cryptography

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How do broad legal obligations become clear & auditable?

Example Use Case (3/3) | Audit Scheme

(Q)TSP/(Q)EAA-Provider

- **eIDAS** Article 45d: requirements + Annex V 45e: verification against authentic sources + Annex VI
- Commission Implementing Regulation(EU) 2025/1569 & 2026/1735
- ETSI EN 319 401 **V 3.2.1** (General Requirements)
- ETSI TS 119 471
  - Amendments of CIR
  - EUIDW specific requirements = not applicable
  - revocation service requirements = not applicable
- Authentic Source
  - ETSI TS 119 478 (interface)
  - (CIR 2025/1569 & 2026/1735: verification result shall ~~exclusively~~ state whether the attribute has been verified or not and specify the public sector body responsible for the authentic source)

Identity Proofing Provider

- eIDAS (Article 24(1a)(c))
- Commission Implementing Regulation(EU) 2025/1566
- ETSI EN 319 401 **V 3.1.1** (General Requirements)
- ETSI TS 119 461 (Identity Proofing), only relevant requirement for **„extended LOIP“** and
  - 9.2.3 using an identity document for unattended remote identity proofing

IDENTITY PROOFING SYSTEM

- Evaluation of Presentation Attack ISO/IEC 19989-3 (EUCC assurance level ‘high’ cover AVA_VAN level 3 | **open discussion**)
- Evaluation of Injection Attack CEN/TS 18099 (high (Level 3)
- biometric performance testing ISO/IEC 19795-1 capability (SELF-TEST)

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Conclusion

Auditing Trust Services in the EUDI Wallet Ecosystem.

Certification and evaluation creates comparable assurance — and turns compliance into confidence.

27 national approaches (EUIDW | PubEAA) can produce 27 different levels of assurance. Harmony is essential for trustworthiness.

Simplicity through expertise: one strong partner network for conformity assessments, laboratory evaluations, and up-to-date attacker testing.

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Thanks for your participation!

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Contact for Laboratory Services:

- Hardware & Software Evaluation for Common Criteria / EUCC (Substantial & High) and Site Certification
- TR Conformity Services
- Biometric Testing

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