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Deutsche Sozialversicherung
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Consultation by the European Commission on the proposal
for a Regulation on the establishment of European Business
Wallets

I. Preliminary remarks

The German Social Insurance (DSV) supports the European Commission's proposal to introduce digital wallets for businesses (European Business Wallets – EBW). These can facilitate exchanges between businesses as well as between businesses and public administrations and improve the interoperability of public services in the European Union (EU). EBW could also complement existing national identity solutions by providing a digital identity for businesses and public entities that can be used across the EU. This would facilitate cross-border procedures. For successful implementation, it is important that existing national and European structures are taken into account and further developed in a meaningful way, without creating redundant parallel structures.

II. Position

1 _ General assessment

DSV supports the European Commission's objective of creating a uniform, interoperable solution for businesses through EBW, for example for digital identification, authentication, electronic signatures and seals as well as for the exchange of data and evidence. In this way, EBW can facilitate communication between businesses and social security institutions and improve cooperation across borders – for example with regard to the coordination of social security systems.

At the same time, from DSV's perspective, important questions regarding the concrete design and implementation remain open. For example, it is unclear whether and how businesses will actually use EBW, as their use is intended to be voluntary under the Commission's proposal and their added value will only become apparent in practice. From DSV's point of view, however, the European legal framework should provide for the possibility to make the use of EBW mandatory for a defined group of businesses or use cases under national law in order to avoid duplicate procedures. Following successful implementation, a uniform use of EBW could, for example, be envisaged in communication between service providers and social security institutions or their associations.

In addition, there is a need for clarification regarding the definition of "economic operators" and thus the actors covered by the Regulation. A more precise definition is



required in order to better assess the practical implications of the provisions – in particular with regard to the obligation to implement or recognise under Article 16.

2 _ Interoperability and integration into existing systems

From DSV's perspective, it is important that EBW are designed to be interoperable across the EU and interact with existing national and European systems without replacing already established solutions. EBW should meaningfully complement existing solutions as an additional authentication method and be understood as the next step in development, without creating new parallel structures.

One example is the application for A1 certificates within the framework of the EU rules on the coordination of social security systems. Here, EBW can complement existing identification procedures and facilitate secure cross-border applications. In the future, the A1 certificate is also to be stored as a digital document in the European Digital Identity Wallet (EUDI Wallet). This will also form the basis for the planned European Social Security Pass (ESSPASS). Close coordination and alignment between EBW and ESSPASS is therefore essential in order to ensure a consistent application.

In general, clear and unambiguous identification of businesses is crucial for the effective use of EBW. A prerequisite for this is that EBW identification procedures are compatible with existing national systems and identifiers. While the proposal refers to existing European identifiers such as the European Unique Identifier (EUID) and the linkage to existing business registers, it remains unclear how these are to be connected with additional national identifiers used in administrative procedures. From DSV's perspective, there is significant need for clarification regarding the underlying identification procedures and identifiers. It is also unclear whether natural persons are to be linked to businesses in the context of EBW and how such a linkage would be implemented in practice.

Furthermore, data should be provided and exchanged via EBW in structured and machine-readable formats in order to enable efficient processing and genuine interoperability. It must also be clarified how EBW will be integrated into existing European data exchange systems – for example in the context of the once-only principle. It is important to avoid multiple submissions of information.

3 _ Technical implementation and application

The introduction of EBW entails significant technical and organisational challenges. New technical infrastructures must be established and integrated into existing systems. This creates additional effort and requires appropriate resources. Against this background, it is necessary for the European Commission to define clear technical specifications and security requirements at an early stage and to closely involve the implementing bodies.

This applies in particular with regard to the 24-month deadline provided for in Article 16 of the proposal for the implementation of the core functionalities of EBW by public administrations. From DSV's perspective, this deadline is very ambitious and should be extended appropriately in view of the significant technical and organisational effort required. In general, sufficient implementation periods should also be ensured when additional procedures are introduced or the core functionalities are expanded.

Timely implementation requires that technical standards and specifications are available in due time. It should therefore be considered to link implementation deadlines to the availability of these specifications. In this context, DSV welcomes the transitional provision in Article 16(6), which allows public authorities to continue using existing alternative solutions instead of the qualified electronic registered delivery service for a transitional period of up to 36 months.

Another challenge is the obligation to accept EBW in existing procedures. The proposal does not clearly regulate when the use of EBW will have the same legal effect as existing procedures. From DSV's perspective, there is a need for clarification in order to avoid that established structured data exchange procedures with automated processing are replaced or supplemented by less structured forms of data transmission. Such developments could run counter to the objective of efficient and reliable administrative processes.

4 _ Security and data protection

For social security institutions, security, reliability and data protection are of central importance. EBW must therefore be designed in such a way that existing security standards are maintained, and a trustworthy European framework is created. DSV therefore welcomes that, according to the Commission proposal, secure electronic identification means under the eIDAS Regulation at the assurance level "substantial" or "high" are to be used for registration. These security requirements are considered appropriate.

It should be examined whether the accreditation and trust level of EBW should be aligned with that of the EUDI Wallet. The currently envisaged mere notification or declaration of intent by providers pursuant to Article 11(4) of the draft Regulation should be replaced by a binding state certification or authorisation procedure, in particular if EBW are to be used to request Public Body Electronic Attestations of Attributes (PuB-EAA) and Qualified Electronic Attestations of Attributes (Q-EAA). Only through equivalent regulatory requirements for wallets for natural and legal persons can a uniform level of trust be ensured and fragmentation avoided.

Furthermore, a reliable technical infrastructure is crucial for the security and trustworthiness of the services provided by social security institutions. This requires EU-wide uniform rules and standards, in particular for EBW providers and for digital credentials within the wallet. It must be ensured that the security level of existing identification and authentication solutions is not weakened, especially as actions carried out via EBW are intended to have the same legal effect as existing procedures. In doing so, the specific requirements of social security institutions regarding data protection and data security, as well as the particular requirements in the context of critical infrastructures, must be adequately taken into account.

About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.