

Position on the European Business Wallet



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Eurochambres welcomes the European Business Wallet as a cornerstone of a simpler, more competitive and digital-by-default Single Market, provided it delivers truly interoperable, secure and affordable solutions that remain voluntary yet fully accessible for all businesses, especially SMEs, microenterprises and the self-employed.

1. Executive summary

The European Business Wallet (EBW) establishes a legal and technical framework to enable secure identification, authentication, and cross-border communication for businesses across the EU. Eurochambres welcomes this initiative as a timely and essential step toward reducing administrative burdens, enhancing cybersecurity, and strengthening the EU's digital sovereignty. By anchoring business identity in authentic sources such as national business registers, the EBW will allow legally equivalent digital transactions and advance the vision of a digital Single Market.

To succeed, implementation must ensure equitable access for all business entities – including SMEs, microenterprises, and the self-employed. The EBW should remain voluntary for these groups, but its use must be equally attainable and beneficial to avoid any digital divide. The “light” regime based on the European Digital Identity Wallet (EUDI) is a welcome and practical approach that should give smaller actors full access to essential EBW functions without additional technical or financial barriers.

Eurochambres supports the use of the European Unique Identifier (EUID) as the primary EU reference within the European Business Wallet framework, complemented by equivalent identifiers from authoritative national sources for operators not covered by the EUID. Alignment with possible future EU tax or business identification frameworks will further enhance coherence and interoperability.

The Chamber network stands ready to support businesses – especially SMEs – in adopting the EBW through awareness, onboarding assistance, and technical support. For this role to be effective, Chambers must be recognised as key partners and equipped with adequate resources and clear guidance from EU institutions.

Through open technical standards, strong data-protection safeguards, and integration with other European digital tools such as the Digital Product Passport and e-invoicing systems, the EBW can become a cornerstone of a competitive, secure, and inclusive European digital economy.

2. Detailed comments on the proposal

Protection of SMEs and microenterprises

- Microenterprises and self-employed must have equal access to the European Business Wallet and use of the EBW should remain voluntary for them rather than becoming de facto mandatory.
- No technical, regulatory or pricing barriers should discourage SMEs, microenterprises or self-employed persons from using the EBW.
- There should be no gradual expansion of requirements to access the EBW and no rising costs over time that would disproportionately affect smaller actors.
- Procurement and regulatory rules should ensure that using the “light” regime of the business wallet (e.g. via EUDI for self-employed) is fully sufficient and does not disadvantage microenterprises and self-employed compared to users of a full EBW.

Supporting business uptake through awareness, training and technical assistance

To maximise the uptake of the EBW, especially given the voluntary nature of the EU regulation, comprehensive accompanying measures will be essential. Beyond awareness-raising, businesses will need structured technical support, practical guides and training materials, including webinars and step-by-step tutorials to help SMEs and micro-enterprises integrate the wallet into their digital processes. Compliance toolkits should also be provided to support businesses in meeting regulatory requirements.

These support actions should be deployed in close partnership with economic intermediaries such as the network of the Chambers of Commerce and the European business support network Enterprise Europe Network (EEN). Their proximity to entrepreneurs, operational experience and hands-on expertise would help build trust, maximise participation, disseminate results effectively and encourage a broader voluntary uptake of the wallet across the Single Market.

By positioning them as an empowered implementation partners and leveraging their trusted relationship with entrepreneurs would not only drive business uptake but also ensure coherent deployment across the Single Market and deliver measurable impact, thus making the EBW a tangible driver of digital transformation, administrative simplification and cross-border interoperability.

Identification framework and EUID

- Where available, the EUID should be used as the primary EU identifier for the European Business Wallet framework. For categories of economic operators not covered by the EUID, the framework should provide for equivalent identifiers derived from authoritative national sources.
- Competent national authorities (e.g. business or tax registers) should make available, upon request of the economic operator, a complete, authoritative identification dataset in the format needed for EBW. The issuance and revocation of such data should remain with the relevant national authorities, in line with their institutional responsibilities and their role in ensuring data integrity and reliability.

- Extensions of the EUID should be aligned with any future EU-level Taxpayer Identification Number (TIN) initiative to avoid multiple overlapping IDs and to create a coherent, future-proof identification framework for all economic operators.
- The regulation should clarify that natural persons who carry out multiple distinct economic activities (e.g. lawyers and tax advisors) can obtain separate identification data sets and corresponding EBWs for each activity, reflecting the different authentic sources and mirroring national approaches where each economic activity of a natural person is treated as a separate company.

Implementation challenges

- The initial adoption and IT costs for SMEs associated with connecting to and using the EBW should be acknowledged and addressed
- A minimum set of attributes required for EBW identification, based on authentic sources, should be defined to ensure legal certainty and interoperability.
- Existing representation rights, including power of attorney and power of representation, should be preserved; the proposal's provisions on the creation, management and delegation of mandates to authorised representatives are welcome and should be maintained and operationalised.
- Existing mandate and power-of-attorney databases and similar infrastructures should be integrated into the EBW ecosystem, so that proven national solutions can be reused rather than duplicated.
- The inclusion of SMEs is of high importance and should be encouraged and facilitated through targeted incentives and simplified, ready-to-use solutions (e.g. templates, plug-ins, low-cost onboarding).
- Clear governance structures and data-protection responsibilities within the EBW framework should be provided.
- Adequate funding and technical assistance should be ensured for registries and other authentic sources that must supply EBW-relevant data and credentials.
- A controlled testing environment (sandbox-type framework) should be provided, allowing Chambers, businesses and solution providers to pilot future functionalities.

Technical recommendations and interoperability

To ensure that the European Business Wallet operates securely and consistently across the Single Market, the technical framework should:

- Promote common standards and open APIs so that wallet solutions and relying parties can interoperate smoothly across borders, ensuring that EBWs work consistently in all Member States.
- Ensure that these standards and APIs enable deep, practical integration of the EBW with other core EU digital frameworks, notably the Digital Product Passport (DPP), e-invoicing systems developed under the *VAT in the Digital Age (ViDA)* initiative, and the planned 28th regime, so that identity and credential data can flow reliably between them. Full interoperability with these frameworks would help avoid duplication, reduce administrative burdens, and support seamless exchange of business identifiers, attributes and mandates across harmonised reporting environments.
- Explore how AI components could enhance the security and reliability of the EBW, notably through fraud detection, automated document checks and anomaly monitoring, while fully respecting EU principles on data protection, transparency and proportionality for SMEs.

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- Furthermore, strict data protection principles should be applied in the European Digital Directory and related EBW components, particularly regarding discoverability and linking of business and personal data.

Affordability safeguards

- Clear principles should be established to prevent excessive or opaque pricing for business wallet services, in particular for SMEs, microenterprises and the self-employed, including requirements for transparent fee structures, proportionate costs and the ability to switch providers without undue financial or technical obstacles.
- The Commission should, as part of the Regulation's review after a defined period of application, specifically assess the affordability of EBW solutions for SMEs and, where appropriate, consider additional measures to address issues such as excessive pricing or unfair contractual conditions.

Global competitiveness and enhancing the EU's market attractiveness

The EBW should not only function seamlessly within the Single Market but should also be designed for a secured and trustful use beyond EU borders. In a global environment marked by geopolitical instability, rising compliance pressures and escalating cyber-risks, businesses require trustworthy tools that support safe and competitive operations in third-country markets.

To achieve this, the EBW must be interoperable with international frameworks and aligned with widely recognised standards. This would facilitate mutual recognition, reduce bureaucratic burdens abroad, and could provide EU businesses operating internationally with a competitive advantage, through smoother onboarding with foreign partners and stronger protection against fraud and identity misuse.

In this way, the EBW could become not only a driver of digital trust within the EU, but it could also facilitate international cooperation, helping businesses remain resilient, competitive and better equipped to navigate an increasingly volatile global landscape.

For foreign companies, whether suppliers, investors or firms seeking to work with EU partners, an EBW aligned with global standards would project digital trust outward, making the EU a more transparent, predictable and secure market to engage with. By ensuring traceability and reliability across the value chain, it would support SME internationalisation and strengthen Europe's attractiveness as a trusted global trading partner.



Eurochambres – the association of European chambers of commerce and industry – represents more than 20 million businesses through its members and a network of 1700 regional and local chambers across Europe. Eurochambres is the leading voice for the broad business community at EU level, building on chambers' strong connections with the grass roots economy and their hands-on support to entrepreneurs. Chambers' member businesses – over 93% of which are SMEs – employ over 120 million people.

Previous positions can be found [here](#).

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