

ETAF Statement

European Business Wallet proposal

Introduction

The European Tax Adviser Federation (ETAF) would like to thank the European Commission for the opportunity to provide feedback on its proposal for a Regulation on the establishment of [European Business Wallets](#) (COM(2025) 838), published on 19 November 2025. The proposal forms part of the [Digital Package](#), a broader initiative built on four pillars: the [Digital Omnibus](#), the [Digital Omnibus on AI](#), the introduction of European Business Wallets, and the [Data Union Strategy](#). The central aim of the Digital Package is to significantly reduce administrative burdens for companies across the EU, ease compliance costs, and foster greater innovation and competitiveness.

Under article 3 of the proposal, the European Business Wallet (EUBW) is a digital tool that enables users to securely store, manage and share identification data and verified information, authenticate themselves, use electronic services, and manage mandates. The proposal aims to reduce administrative burdens and simplify compliance through secure cross-border digital identification. By establishing a harmonised framework for business identification and document exchange, it is expected to lower costs and address the lack of interoperability, a key source of burden for businesses operating across Member States.

As regulated tax professionals, ETAF members act on behalf of their clients, including large numbers of SMEs, sole traders, and self-employed individuals, on a daily basis and are therefore directly affected by the framework governing digital identification, mandate management, and document exchange. The fragmentation and complexity of the current landscape translate into significant compliance costs for tax advisory practices, particularly for smaller firms operating across borders, and any effort to streamline and harmonise these processes is therefore of direct practical relevance to the profession.

Against this background, ETAF welcomes the Commission's initiative to introduce the EUBW as part of the broader Digital Package and fully supports its ambition to make business in the EU simpler, less costly, and more efficient. The EUBW is probably the most important element of the Digital Package for tax advisers, as it can grant faster access to official client documents, reduce paperwork, and simplify communication with tax authorities from other Member States. For this potential to be fully realised, however, the EUBW should lead to genuine simplification and should not create parallel systems alongside existing professional and administrative procedures, impose additional compliance burdens, or introduce new bureaucratic requirements. The wallet should integrate and build upon established structures rather than operate alongside them.

Following its 13 March 2026 [feedback](#) on the Digital Omnibus on the digital acquis, ETAF sets out its positions on the key elements of the EUBW relevant to the tax advisory profession.

1. Inclusion of sole traders and self-employed individuals

The proposal (see articles 3(4) and 5(3) in conjunction with recital 12) provides that the EUBW will be accessible not only to legal entities but also to self-employed individuals and sole traders. These operators may access the Business Wallet ecosystem through their European Digital Identity (EUDI) Wallet, using the secure communication channel and electronic signature functionality, as a proportionate entry point into the broader framework.

ETAF welcomes this approach. ETAF's members include tax advisers who serve large numbers of SMEs, micro-enterprises, and self-employed individuals, for whom a cost-efficient digital identity solution would provide the greatest benefit. Tax advisers are increasingly acting as digitalisation partners for their clients and as a digital interface between clients and the tax authorities, and any effort to broaden the EUBW's reach to these actors is therefore directly relevant to the profession.

It is also important that the EUBW ecosystem appropriately addresses the professional, organisational, and mandate-specific needs of tax advisers. Tax advisory firms should have access to wallet functionality that reflects their organisational identity, mandates, and role-based rights, with a clear separation between personal identity and professional role.

This consideration is particularly relevant for the tax advisory profession. A clear separation between personal identity and organisational identity is essential for tax advisers who operate as self-employed individuals, given that they act professionally as representatives and intermediaries for multiple clients and organisations.

ETAF welcomes:

- **the inclusive scope that covers sole traders and self-employed individuals:** ETAF welcomes that the proposal extends the EUBW to self-employed individuals and sole traders, including through access to the secure communication channel and electronic signature functionality via the EUDI Wallet.
- **the access to professional wallet features for self-employed tax advisers:** ETAF welcomes that the EUBW framework is designed to address professional, organisational, and mandate-specific needs beyond those of a personal EUDI Wallet. Self-employed tax advisers act as representatives and intermediaries for multiple clients, and it is essential that they have access to business-context wallet functionality reflecting their organisational identity, mandates, and role-based rights, with a clear separation between personal and professional identity.

2. Representation structures and mandate management

The proposal (see recital 18, articles 3(18)-(19), articles 5(1)(j)-(k) and 6(2)(b)) explicitly provides for the digital management of representation rights and mandates within the Business Wallet framework. This is an element that ETAF particularly welcomes. For tax advisers, acting as an authorised representative on the basis of a mandate is not the

exception but the norm. Tax advisory firms act continuously on behalf of clients in tax procedures, administrative proceedings, and social security communications, and the ability to manage and present digital mandates in a legally recognised and interoperable manner is therefore of central practical importance to the profession.

In practice, mandates in tax and administrative law are frequently multi-layered, role-based, and time-limited. They must be granular, auditable, and, where necessary, automatically verifiable. The technical specifications for the Business Wallet should therefore support a clear representation of representation rights and their full lifecycle, covering granting, delegation, restriction, and revocation. A wallet that cannot adequately reflect this complexity would fall short of the needs of the profession.

To ensure continuity of existing work processes, systems already established and widely used by professional practitioners should be integrated into the Business Wallet ecosystem rather than replaced by parallel structures. In several Member States, dedicated professional power-of-attorney systems are already in place and operate with a high level of trust and reliability among practitioners, taxpayers, and tax authorities alike. These should remain interoperable with the Business Wallet and be recognised within the framework, which would allow the once-only principle to be applied consistently and existing verified data to be reused effectively.

The Business Wallet must also support multi-user functionality and internal role and rights management within firms. This covers partner roles, licensed professionals, employees, trainees, and temporary representatives, as well as the allocation of mandate and case responsibilities. This would not only improve internal efficiency but also standardise and accelerate digital evidence provision to authorities and third parties, including banks, registers, and contracting authorities, while ensuring clearer attribution of actions.

The protection of confidential mandate data and client information is a core professional obligation for tax advisers. ETAF welcomes the data protection safeguards built into the proposal, including selective disclosure, data minimisation, purpose limitation, and privacy by design. It is important that implementing acts and technical specifications respect professional secrecy and the confidentiality of tax-related information throughout the wallet lifecycle. The professional adviser's obligation of confidentiality should be preserved within the EUBW framework.

ETAF therefore recommends the following:

- **integrate existing mandate infrastructure:** existing systems used by professionals, particularly national and professional power-of-attorney databases, should be integrated into the EUBW as interoperable tools for verification, rather than replaced. The once-only principle should apply broadly, so that information validly submitted via the EUBW is not re-requested through another channel.
- **ensure full mandate lifecycle support:** technical specifications should allow for a clear, machine-readable representation of the full mandate lifecycle (granting, delegation, restriction and revocation), reflecting the practical realities of professional tax practice.

- **support multi-user and role-based rights management:** the EUBW must support internal role and rights allocation within firms, which will enable precise delegation of tasks and responsibilities whilst maintaining clear accountability and audit trails.
- **preserve professional secrecy throughout:** implementing acts and technical specifications should respect professional secrecy and the confidentiality of tax-related information throughout the wallet lifecycle.

3. Legal equivalence and obligations on public sector bodies

Article 4 of the proposal establishes that actions carried out via the EUBW have the same legal effect as personal visits, paper-based procedures, and other digital processes. ETAF welcomes this principle of legal equivalence. Without it, the EUBW cannot serve as a genuine substitute for existing procedures, and its practical utility would be significantly undermined.

Article 16 of the proposal requires public sector bodies across the EU, including EU institutions, agencies, and bodies, to accept the EUBW for its core use cases no later than 24 months after the Regulation enters into force. ETAF supports the mandatory acceptance approach underpinning this timeline. It should however be noted that a separate 36-month transition period applies specifically to the secure communication channel (QERDS): under article 16(3), public sector bodies may during this extended period continue to support existing QERDS-compliant solutions, provided those offer a gateway to EUBW owners. Only after 36 months must public sector bodies themselves hold a EUBW with the fully integrated QERDS channel. A framework under which public authorities may, but are not required to, accept the EUBW would not deliver the harmonised, cross-border simplification that the proposal sets out to achieve. Tax authorities and other public bodies with which tax advisers regularly interact should be prepared within the applicable timeframes.

At the same time, both public administrations and professional practitioners require adequate preparation time to adapt their processes and systems before full adoption. Tax adviser firms, many of which are small practices with limited resources, will need time to train staff, update procedures, and integrate EUBW functionalities into existing workflows. Care should equally be taken to allow public administrations sufficient time to adapt their processes. At the same time, implementation should be expedited within a clearly defined and reasonable timeframe, in order to capitalise on the opportunities for simplification and burden reduction offered by the proposal.

ETAF also welcomes the “*Business-Wallet-by-Default*” principle set out in the proposal (see recital 57). This is a forward-looking approach that should be highlighted. According to this principle, future legislative and administrative measures should take wallet-based interactions into account from the outset, as a matter of regulatory design rather than an immediate operational requirement in every context. This provides an important signal for the development of the digital regulatory framework and should be preserved throughout the legislative process. It is equally important that this principle is applied as a tool for burden reduction, and not used as a basis for introducing new digital reporting obligations,

additional data collection requirements, or parallel submission channels, which would risk offsetting the simplification benefits of the wallet.

ETAF welcomes:

- **the mandatory acceptance by public sector bodies:** ETAF welcomes the obligation on public sector bodies to accept and enable the use of the Business Wallet within 24 months of entry into force, as set out in article 16. This mandatory approach is important for delivering the cross-border simplification the proposal sets out to achieve, and should ensure that tax authorities and other public bodies are prepared within the applicable timeframes.
- **the Business-Wallet-By-Default principle:** ETAF welcomes the principle set out in the proposal as it ensures that future laws and administrative processes will be designed from the start to work with and be accessible through the EUBW. This approach integrates the EUBW into the regulatory framework rather than treating it as an add-on, and ETAF encourages that it be maintained throughout the legislative process. The principle should be applied as a tool for burden reduction and should not be used to justify new digital reporting obligations, additional data collection, or parallel submission channels that would offset the simplification benefits of the wallet.

4. The European Unique Identifier and interoperability

The proposal (see articles 1(5), 3(36) and 9(1)) provides that the EUBW must use the European Unique Identifier (EUID) where available. The EUID is already used in EU company law to uniquely identify companies across borders via the Business Registers Interconnection System (BRIS), established under [Directive \(EU\) 2017/1132](#). Using this existing identifier avoids additional costs for the approximately 18 million companies already registered in the system and builds on a well-established legal and technical foundation.

ETAF supports using the EUID as the primary identifier in the EUBW. Article 9(1) of the proposal already directly mandates the use of the EUID where it has been attributed, without any further implementing act, which ETAF welcomes. A single, consistent identifier prevents fragmentation of identity systems across Member States and provides the legal certainty needed for cross-border interactions.

However, the EUID does not currently cover all relevant economic operators or public sector bodies, in particular sole traders, self-employed individuals, and public institutions. Given that the proposal extends the EUBW to these actors, a coherent approach to identification would also be beneficial for them. It would therefore be logical for Member States to work towards allocating an EUID to all economic operators and public authorities, ideally within a defined timeframe. This would counteract identity fragmentation and establish a reliable, consistent foundation for the effective use of the EUBW. The effectiveness of the EUBW would also benefit from sufficient register coverage across

Member States, including for self-employed professionals, partnerships, liberal professions such as tax advisers, and public authorities, where appropriate registers are in a position to serve as authentic sources for organisational identity.

ETAF welcomes:

- **the direct use of the EUID under article 9(1):** ETAF welcomes that article 9(1) of the proposal directly mandates the use of the EUID as the primary identifier where it has already been attributed, ensuring legal certainty and preventing fragmentation without further implementing measures.

ETAF also recommends the following:

- **extend EUID coverage via the implementing act:** the implementing act provided for in article 9(4) could usefully set a timeframe for Member States to attribute an EUID to all economic operators and public authorities not yet covered, with a view to establishing a coherent and reliable identification foundation for the effective use of the EUBW across the Single Market. It would also be helpful for Member States to ensure that registers covering self-employed professionals, partnerships, liberal professions, and public authorities are in a position to serve as authentic sources for identity issuance.

5. Cloud capability, automation, and wallet communication

The proposal recognises that the EUBW is not merely a manually operated interface, but is designed primarily for the exchange of structured digital data via back-end systems (see articles 3(42)-(43)), with automated interaction explicitly addressed as a technical feature (see article 6(1)(d)). This reflects the operational realities of professional tax practice, where division-of-labour processing and automated workflows are the norm. It has implications for the security model that the implementing acts should take into account.

For professional firms, access to the wallet should be secured through personal credentials and clear accountability, whilst the underlying attestations and operational objects, including electronic attribute attestations, signature and seal processes, delivery receipts, and audit logs, should be manageable in a division-of-labour manner within the organisation and, where appropriate, processed automatically. A security model that relies exclusively on device binding may not be well suited to these professional realities. In practice, hybrid models combining a secure front end with an organisation-based back-end or cloud environment may be well suited to these professional needs.

The proposal also introduces a secure wallet-to-wallet communication channel (see article 5(1)(i)). ETAF welcomes this in principle, as it has the potential to harmonise and consolidate the currently fragmented landscape of electronic mailbox and delivery systems across Member States. Existing professional communication solutions, such as the dedicated electronic mailboxes already used by tax advisers in several Member States, operate with a high level of trust and reliability and are trusted by both practitioners and

public authorities. These solutions should be recognised and integrated within the EUBW framework rather than supplanted by a parallel channel. A parallel structure that operates alongside, rather than integrating with, established national delivery systems would add fragmentation rather than reducing it.

ETAF therefore recommends the following:

- **support cloud capability and automation:** implementing acts should take account of organisational realities such as representation, division-of-labour processing, and rule-based system-to-system processes, without compromising security and liability principles. Hybrid front-end and back-end models are likely to be relevant in practice.
- **support interoperability of the communication channel:** the secure wallet communication channel should be interoperable with existing electronic delivery and mailbox systems in Member States. It should aim to consolidate rather than fragment the existing landscape, and avoid the need for practitioners to operate parallel channels.

Conclusion

ETAF welcomes the EUBW proposal as an important step towards reducing administrative fragmentation and simplifying cross-border interactions across the EU. To deliver on this potential, existing professional infrastructure should be integrated rather than replaced, the once-only principle should apply broadly, implementing acts should support hybrid models and mandate lifecycle management, and the wallet communication channel should consolidate rather than add to the existing landscape of delivery systems.

ETAF looks forward to engaging further with the European institutions on this proposal.

Annex: summary of ETAF recommendations

Issue	Concerned article(s)	ETAF Recommendation
Representation structures and mandate management	Articles 3(19), 5(1)(j), 5(1)(k) and 6(2)(b), COM(2025) 838	Integrate existing national power-of-attorney infrastructure as interoperable evidence infrastructure rather than replacing it; apply the once-only principle broadly so that information validly submitted via the EUBW is not re-requested through another channel; ensure full mandate lifecycle support; enable multi-user and role-based rights management within firms; preserve professional secrecy and confidentiality of client data throughout the wallet lifecycle; consult the profession early in technical specification development.
European Unique Identifier and register coverage	Articles 9(1) and 9(4), COM(2025) 838	Implementing act under article 9(4) should set a binding timeframe for EUID attribution to all economic operators and public authorities; Member States should ensure sufficient register coverage for self-employed professionals, partnerships, liberal professions, and public authorities as authentic sources for identity issuance.
Cloud capability and wallet communication	Articles 5(1)(i), 6(1)(d) and 16(3), COM(2025) 838	Implementing acts should support hybrid cloud and back-end models; wallet communication channel must consolidate rather than fragment existing national delivery systems, integrating trusted existing solutions rather than displacing them.

Notes

For enquiries, please contact: info@etaf.tax , Phone: +32 2 2350 105

About ETAF

The European Tax Adviser Federation (ETAF) is a European umbrella organisation for tax professionals whose activities are regulated by law. It is set as an international not-for-profit organisation (AISBL) governed by Belgian law, based in Brussels and was launched on 15th December 2015. It represents more than 215 000 tax professionals from France, Germany, Belgium, Romania, Hungary, Austria and Croatia. ETAF is a registered organisation in the EU Transparency Register, with the register identification number 760084520382-92.