



The business case for actors in the EUDI Wallet ecosystem

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There's a big elephant in the European Digital Identity Wallet (EUDIW) room, a creature that everybody knows is there but almost everybody ignores: How can commercial actors in the EUDIW infrastructure get paid? I've ...more

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The elephant in the European Digital Identity Wallet room – how can service providers get paid?

The European Digital Identity Wallet (EUDIW) is set to transform digital identity across Europe, but a crucial question remains unanswered: how will commercial actors get paid? While the eIDAS Regulation envisions private sector participation, sustainable business models are missing from the discussion. Without viable payment mechanisms, the system risks relying entirely on government funding, which may not be ideal. This post explores potential solutions and payment models to ensure a financially sustainable EUDIW ecosystem.

Two business models:

- a) Commercial – sustainable income from payments
- b) Government funding

Do we want an EUDIW ecosystem completely funded by government?

REGULATION (EU) No 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 23 July 2014

on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC

(16) “trust service” means an electronic service normally provided for remuneration which consists of any of the following:

- (a) the issuance of certificates for electronic signatures, certificates for electronic seals, certificates for website authentication or certificates for the provision of other trust services;
- (b) the validation of certificates for electronic signatures, certificates for electronic seals, certificates for website authentication or certificates for the provision of other trust services;
- (c) the creation of electronic signatures or electronic seals;
- (d) the validation of electronic signatures or electronic seals;
- (e) the preservation of electronic signatures, electronic seals, certificates for electronic signatures or certificates for electronic seals;
- (f) the management of remote electronic signature creation devices or remote electronic seal creation devices;
- (g) the issuance of electronic attestations of attributes;

Unless trust service providers get paid, there will be no trust services for the EUDI Wallet, e.g. no qualified electronic attestation of attributes.

REGULATION (EU) No 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

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on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC

2. European Digital Identity Wallets shall be provided in one or more of the following ways:

- (a) directly by a Member State;
- (b) under a mandate from a Member State;
- (c) independently of a Member State but recognised by that Member State.

5. European Digital Identity Wallets shall, in particular:

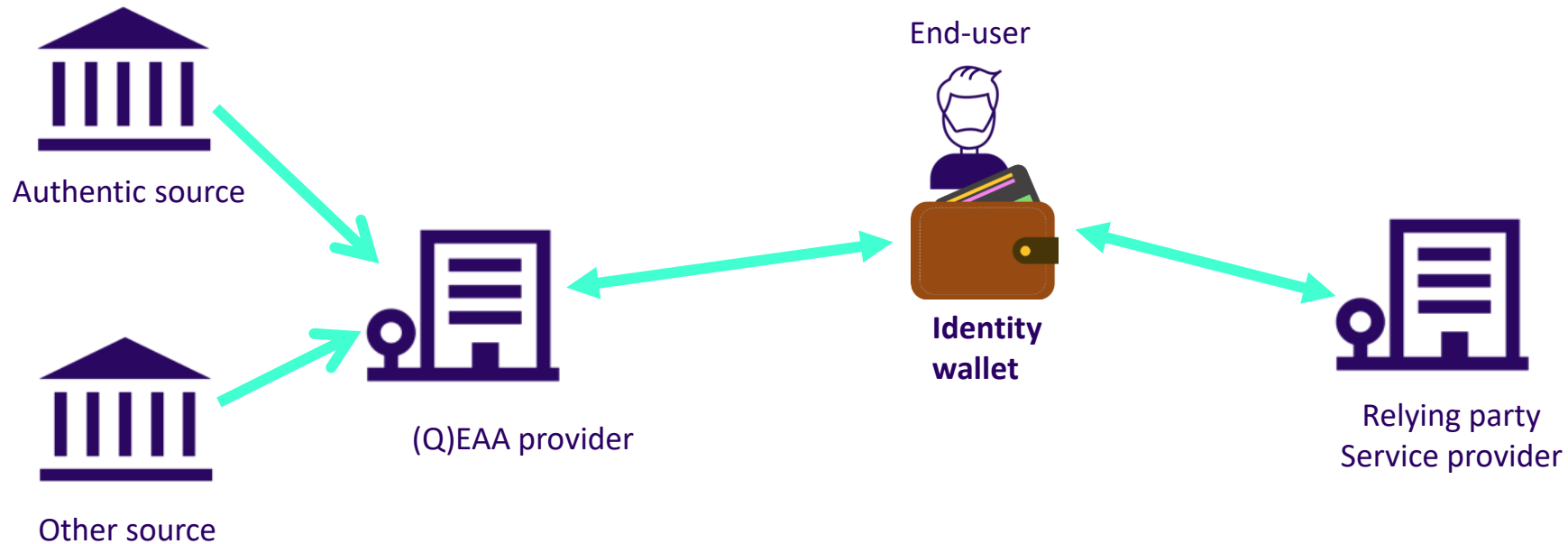
- (b) not provide any information to trust service providers of electronic attestations of attributes about the use of those electronic attestations;
- (g) offer all natural persons the ability to sign by means of qualified electronic signatures by default and free of charge.

How can a “recognised” EUDI Wallet provider get paid?
How can the (Q)EAA provider get paid?
How can the QES provider get paid?

Providers must take on liability – that comes with a cost

Governments rarely take on liability

Attribute attestations



1. Source pays – hires (Q)EAA provider to fix complexity
2. User pays – your driving license may not be for free
3. Service provider pays – requests attestations (pay EAA provider, in theory pay user)
4. Government pays – contracting one or more (Q)EAA providers

The challenges



The EUDIW work focuses only on legal and technical matters

Business models have not been considered



Open infrastructure, no agreements (on payment or anything else)

Agreements not prohibited but not foreseen

No obligation to pay



No payment metadata

What is the cost of an attestation, and who shall receive the payment?

Can an actor refuse to accept if it is too expensive?

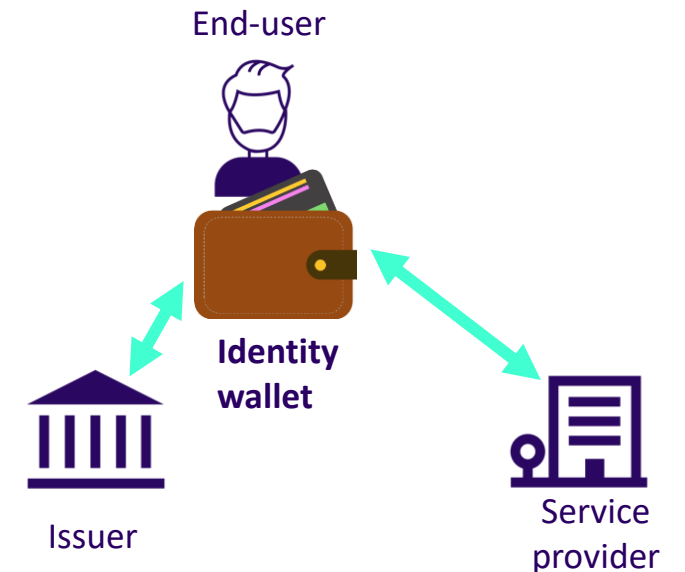


Payment not embedded in current protocols



Unlinkability and payment together is challenging

What can you deduce from receiving payment?



How can a service provider pay?



Establish a clearinghouse in the infrastructure

A service provider pays there according to pricing metadata – sum and receiver
No statement on what the payment is about
Requires service providers to be honest, or extra control mechanisms



Ensure by protocol that a “billable event” occurs at the issuer

Validation protocol not revealing what is validated
Payment metadata should be used for transparency



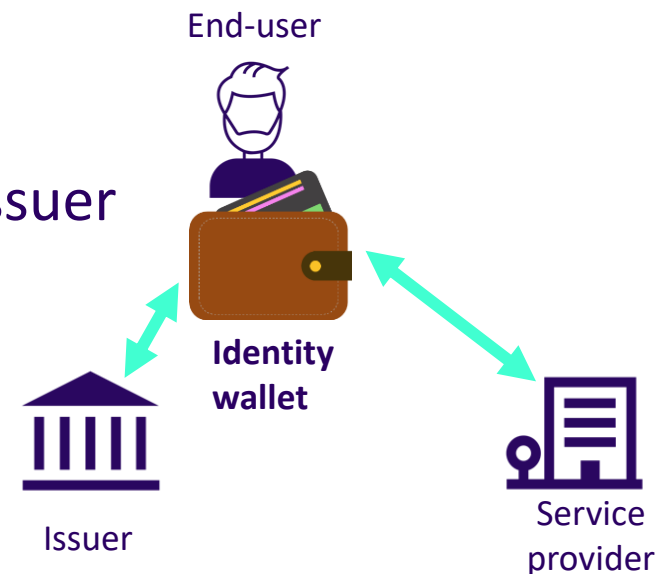
Execute by protocol a smart contract at validation

Requires use of ledgers and related protocols
Validation triggers payment



Use intermediaries as “clearinghouses”

Service provider consumes EUDIW via intermediary (“broker”)



ETSI has started work

ETSI TR 119 479-2 V1.1.1 (2025-07)

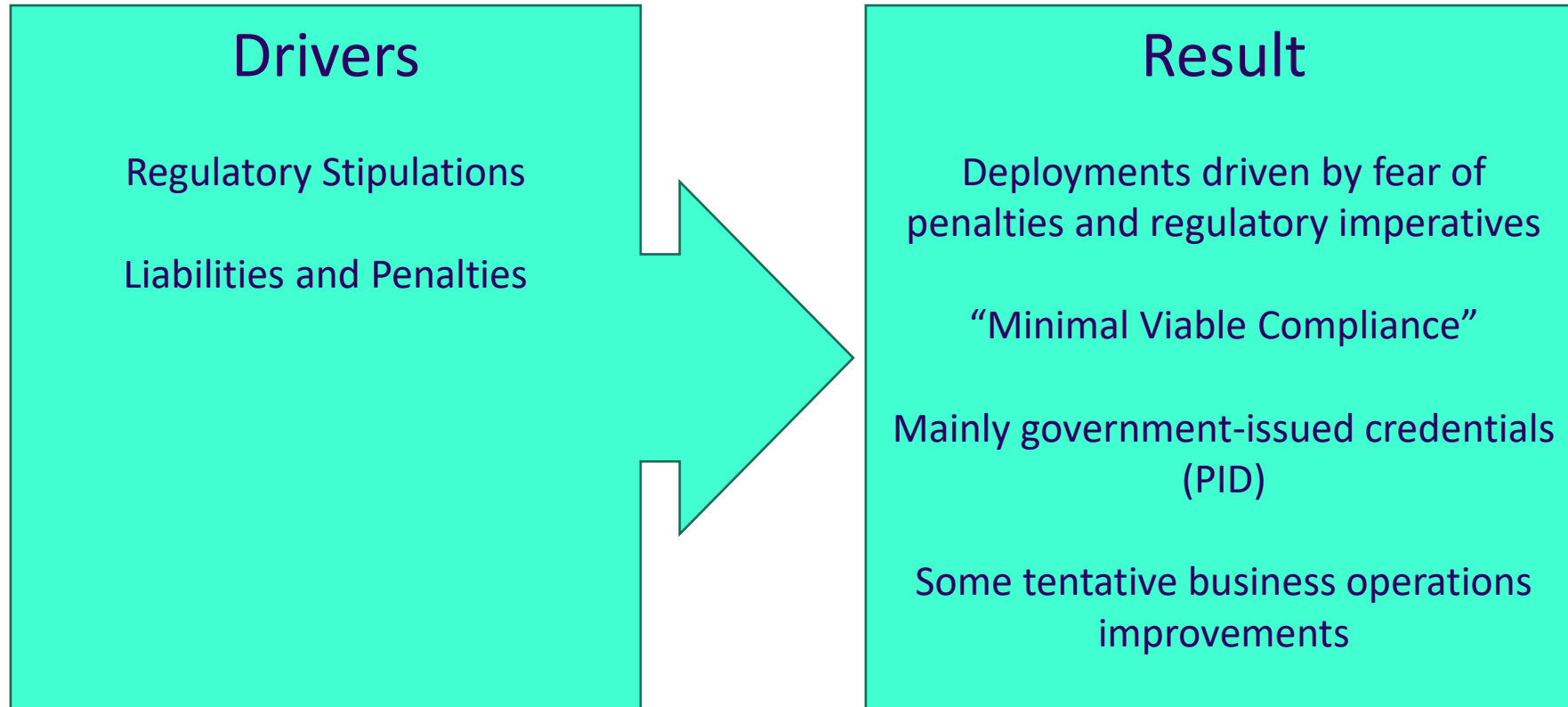


Electronic Signatures and Trust Infrastructures (ESI);
Technological Solutions for the EU Digital Identity Framework;
Part 2: EAA Extended Validation Services Framework
and Application

1. Attestation rulebook catalogue for payment info
2. Payment metadata in attestations
3. Extended validation service – cyphered VC
 - a) Relying party tx towards EAA provider to decrypt
 - b) Creates billable event at EAA provider
 - c) Without identifying the attestation
4. Payment protocol as part of validation protocol?

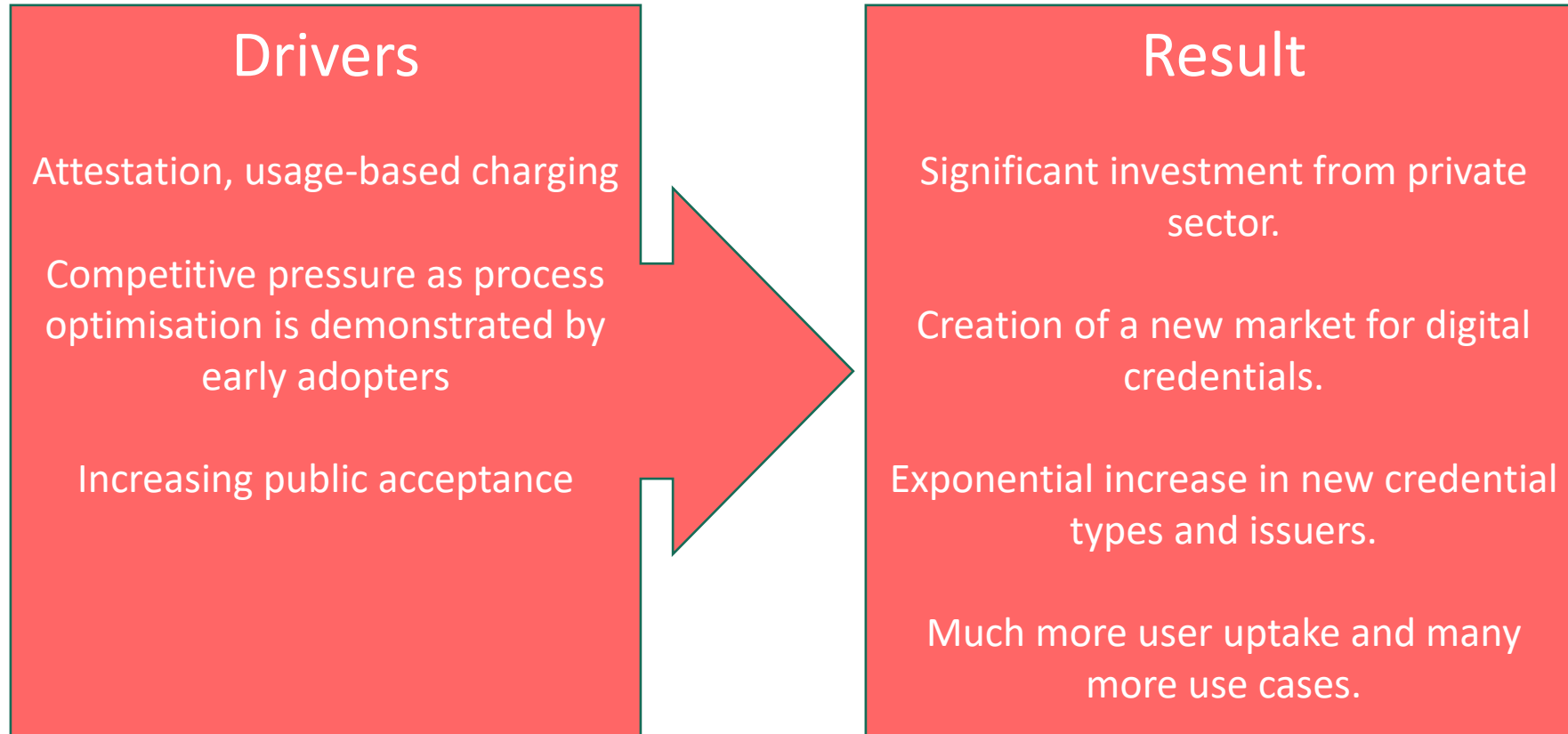
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Economic model, two-phases, short term

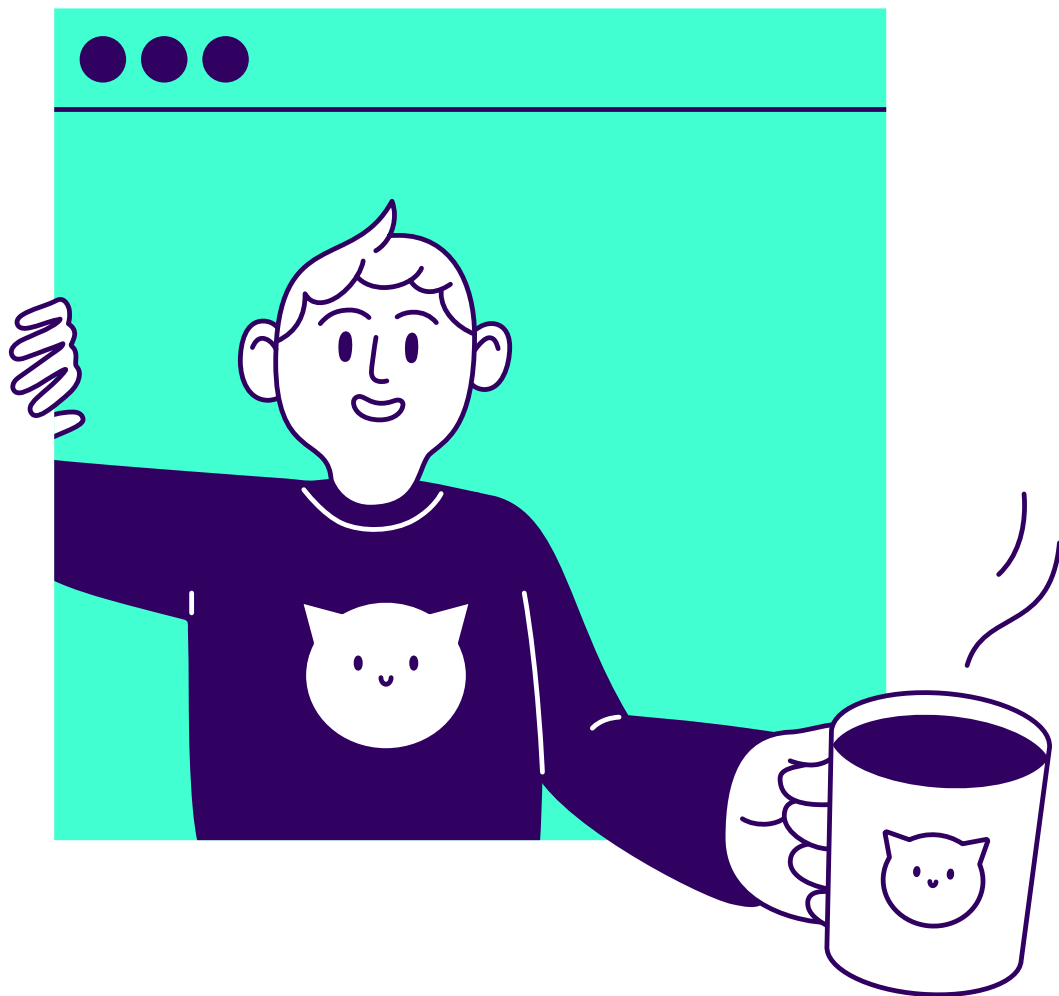


Main driver is fear of non-compliance
Intermediaries crucial for service provider integration and payment
Get going at designing the long-term model, with payment options
“Sales and marketing” to users and service providers
... but governments are notoriously bad at sales and marketing

Economic model, two-phases, long-term



Thriving ecosystem with innovative use cases
Where the providers can earn money
EUDI Wallet will be not be a success unless this happens



Thank you!

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