

Response to the Call for Evidence on the European Business Wallet

Introduction

The Norwegian Digitalisation Agency (Digdir) is the main tool of the Norwegian government for faster and more coordinated digitalisation of its public sector. The Agency is subordinate to the Norwegian Ministry of Digitalisation and Public Governance. On behalf of the ministry, Digdir represents Norway in the EUDICG.

The Brønnøysund Register Centre (BR) maintains national business registers and other public registers, as well as several different services. The information from the registers is utilised in both the public and private sectors. BR actively participated in the EWC large-scale pilot and will play a key role in Norway's efforts on the European Business Wallet.

We welcome the European Commission's initiative to develop the European Business Wallet as a cornerstone for the digital transformation of the Single Market. We fully support the Commission's vision of a paradigm shift from a document-based to a data-based Single Market, as articulated in the recent strategy "Making the Single Market simple, seamless and strong" and reinforced by the Draghi Report on European competitiveness.

The European Business Wallet represents a crucial opportunity to unlock significant productivity gains, reduce administrative burdens, and strengthen trust in cross-border business interactions. We believe this initiative can fundamentally transform how businesses interact with public authorities and with each other, creating a more efficient and competitive European economy.

The Transformative Potential of the European Business Wallet

We recognise the European Business Wallet as an essential infrastructure component that can address several of the key barriers identified in the Single Market. By enabling businesses to store, manage, and share verifiable credentials about themselves, such as registration certificates, tax compliance attestations, certifications, and licenses, the wallet can dramatically simplify business operations across borders.

We particularly see value in how the Business Wallet can:

Simplify public procurement processes by enabling direct verification of supplier credentials, following the successful adoption pattern of eInvoicing where public sector requirements drove market-wide adoption.

Streamline sustainability reporting under CSRD and VSME by enabling trust chains throughout supply chains, where verified environmental data and certifications can be reused rather than repeatedly verified by each actor.

Facilitate cross-border business establishment by allowing companies to present pre-verified registration data that can be automatically accepted by authorities in other Member States.

Combat financial and labor market crime by enabling automatic verification of subcontractors' tax, health and safety, and employment compliance, particularly in high-risk sectors such as construction.

Facilitate citizen engagement in societal challenges by giving consumers access to the same verified business credentials that public authorities require. This empowers citizens to make informed choices about which companies they support, whether verifying sustainability claims, labor practices, or tax compliance. By extending the trust infrastructure beyond B2G to B2C interactions, the Business Wallet can mobilize consumer power in addressing climate change, promoting fair labor practices, and supporting responsible businesses.

Key Recommendations for the Regulation

Based on our analysis and experience with digital identity infrastructure, we offer three fundamental recommendations for the regulatory framework:

1. Issuance of Legal Person Identifiers (LPID) Must Be a Public Authority Responsibility

The trust underpinning the entire Business Wallet ecosystem depends on the proper management of identities throughout their lifecycle. Given that businesses emerge, transform, merge, and dissolve at a rapid pace, the ability to revoke or suspend identities in a transparent and orderly manner is crucial. This is fundamentally a public authority function that should remain with national business registries.

We strongly recommend that the regulation explicitly establishes LPID issuance as a public authority responsibility, ensuring that the trust foundation of the system remains robust and that revocation mechanisms are properly governed. This approach will ensure legal certainty and maintain the necessary level of assurance for cross-border trust.

2. The European Unique Identifier

A well-functioning and cohesive European ecosystem for digital solutions requires that both businesses and public authorities can be uniquely identified across borders and systems. To ensure seamless interaction, efficient data exchange, and a high degree of interoperability, it is essential to establish a common identifier for all actors within this ecosystem.

We support that the **European Unique Identifier (EUID)** should evolve to be the common and mandatory identifier for both businesses and public authorities in the European digital ecosystem.

3. Value Creation Through Diverse and Reusable Credentials

The success of the Business Wallet will depend on its ability to contain useful, reusable credentials that serve multiple contexts. We strongly advise against rigid definitions that would limit the types of credentials that can be included. Instead, we propose a three-tier structure:

Formal standardized credentials that function identically across the Single Market (such as LPID, EUCC, and basic tax compliance attestations).

European norms that allow for national adaptation while maintaining interoperability (such as sustainability data where countries may have slightly different priorities).

National credentials that stimulate innovation and address specific national needs.

Critically, the regulation should establish clear processes for how credentials can evolve between these tiers. A useful national innovation should be able to become a European norm and potentially a formal standard. This approach ensures both stability and innovation within the ecosystem.

Implementation Considerations

We emphasize that the Business Wallet should be understood fundamentally as **trust infrastructure, not data sharing or storage infrastructure**. Unlike personal wallets, which are app-based and device-centric, the Business Wallet is system-oriented and focused on integration. It should act as a "trust layer" between internal company systems and external actors, enabling verified facts about the company to be presented in digital form—such as ownership, certifications, tax compliance, and licenses—to regulators and business partners.

Critically, the Business Wallet should not duplicate existing data sharing or storage solutions. Rather, it should serve as a facilitator for the secure use of identity in conjunction with existing infrastructures. This distinction is essential: we already have systems for storing and sharing data—what we lack is a standardized way to establish and verify the trustworthiness of that data across borders and contexts.

We also emphasize that while technical standards and interoperability are crucial, the regulation should focus on establishing clear principles and governance structures rather than prescriptive technical solutions. The framework should be technology-neutral and future-proof, allowing for innovation while maintaining security and trust.

We also stress the importance of ensuring that the Business Wallet infrastructure supports the once-only principle effectively, reducing the need for businesses to repeatedly provide the same information to different authorities or business partners.

Conclusion

We strongly support the European Business Wallet initiative as a transformative tool for the Digital Single Market. By establishing businesses' digital identities as a public good, creating

flexible but interoperable standards, and enabling rich credential ecosystems, we can unlock tremendous value for European businesses and citizens.

We stand ready to actively participate in pilots, contribute to standard development, and share our experience in building trusted digital infrastructure. The European Business Wallet represents a historic opportunity to lead the development of tomorrow's digital economy. We must seize this opportunity with a regulatory framework that balances trust, innovation, and practical implementation.

We look forward to continued collaboration with the Commission and Member States in bringing this vision to reality.