2026 Survey Report

Expert Opinions on

The State of the EU Digital Identity Wallet

June 2026, Amsterdam

| v1.0

INTRODUCTION

The European Union aims to realise a highly secure, trustworthy, empowering solution for cross-border digital identification and data (attributes) sharing, for use in and across Member States. A key reason for this is to support the further development of the European digital single market.

This solution applies to individuals (citizens) and organisations (legal entities) and wants to give people greater control over when, where and with whom they share their data online, strengthening protection against identity threats. Driving this solution is eIDAS 2.0, the (revised) legal framework for electronic identification and trust services for electronic transactions, into force since April 2024. eIDAS 2.0 makes it mandatory for governments to make digital identity wallets available in 2026 and requires many industries to accept data-sharing with these wallets by the end of 2027.

Deadlines for making national digital identity wallets available are now approaching quickly, turning policy ambition to technical and operational reality under significant implementation pressure. Questions and challenges floating around most are about whether the ecosystem can make the EU DIW useful, trusted, and adoptable at scale.

For this survey report, we once again put a curated set of questions about the developments of the EU DIW before subject-matter experts and participants of Identity Week, asking them about where is it expected to make a positive impact, what progress is being made, and what challenges remain around adoption and use.

June 2026
Amsterdam

HIGHLIGHTS OF SURVEY FINDINGS

This year's survey suggests a shift from policy ambition and individual wallet use toward practical ecosystem adoption, with the Business Wallet emerging as a more prominent source of expected value, the most notable difference compared with previous years.

Respondents expect **business wallets to improve costly processes such as customer onboarding and employee certification checks**. Survey responses further suggest that organisational and business use (wallet for legal entities) may yield significant benefits, more than seen in previous editions of the survey and more than individual and government use.

Expected value also differs by wallet type: businesses are expected to benefit mainly from cost savings, efficiency and economics, while expected benefits for individuals are more in sovereignty, privacy and control over personal data. Also, business wallet adoption may propagate awareness and general knowledge about wallets, paving the road for adoption of personal wallets as a side effect.

In terms of **largest benefactor of personal wallets, most responses signal the expectation that individuals stand to benefit most (41%).** Just over a quarter, 27% of responses, expect service providers to benefit most, and 14% consider the largest benefits to be with governments. How this will turn out for the business wallet remains to be seen, and the question of which type will be most successful in terms of adoption remains open as well.

Looking at **factors that respondents consider impactful for adoption, user experience and ease of use is mentioned most often, followed by relevant use cases, and security and privacy**. Sensitive logging in / authenticating with government (and related) services (high value/risk) is considered by the majority of respondents to become the most successful use case, which is in line with last year's results. For responsible use, respondents mainly suggest education and wallet design to help users understand what they share and avoid oversharing.

Expert responses flag competition from non-EU DIWs, including bigtech wallets, as a risk. The concern is that these may be easier to adopt while offering fewer of the safeguards and value principles associated with the EU DIW.

With regards to **barriers for entering into the ecosystem**, survey outcomes suggest something we might call a *chicken-and-egg-problem.* A healthy ecosystem needs Issuing Parties and Relying Parties, and Issuing Parties and Relying Parties look for healthy business cases. Without investments the ecosystem might struggle to mature and to bring forth clear business cases, and without a clear business case, investments are difficult to justify, which presents a barrier for parties to step into the ecosystem. And investments can be significant: adapting back offices and processes, and having skilled staff available to execute this.

Still **prominent in the area of challenges for adoption appears the lack of awareness (like in 2025), direction, and vision.** Half of the answers indicate that unclarity (on one or more of these topics) are the main challenge for adoption.

Respondents identified a wide range of **challenges for Member States meeting the deadlines: from budget constraints, lack of skilled workforce, and legislation backlog, to scepticism and the ARF changing often.** Expectations for Member State delivery by the end of 2026 are low. Most respondents expect between 0 and 8 out of 27 Member States to have their national wallet available on time, and several expect none to do so.

Overall, this year's results suggest a more mature but still uncertain ecosystem: the value of the EU DIW seems to becom clearer, especially for business use, but adoption still depends on stronger use cases, clearer incentives, broader awareness, and implementation capacity across Member States.

Survey themes and questions

We see four relevant themes in the EU DIW ecosystem to assess the State of the EU DIW. These relate to who **benefits**, **adoption** by actors in the ecosystem, which are in part linked to the **business model** around the EU DIW, and general **challenges and risks**. These themes translate to our survey setup, with a set of questions under each, to ensure all are addressed. Our report also follows this structure.

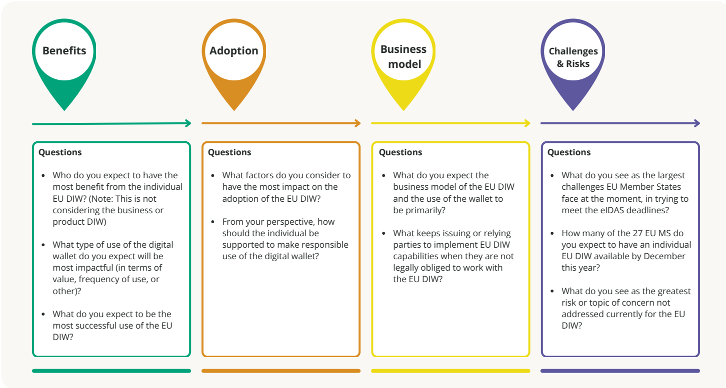

Figure 1 2026 Survey Themes

About this report

This report is based on anonymous responses of nearly 50 experts in the field of digital identity. They answered 10 questions on the four EU DIW Ecosystem themes in an online survey conducted in Q1 2026. The first edition of this expert survey report was published in 2023, making this the **fourth edition in this study series**. Some questions have been asked in every survey, yielding trend lines in the responses.

The survey is **a joint effort by SonicBee and Terrapin** (organisers of the Identity Week conference series). Survey creation and analysis of anonymised responses done by SonicBee. Data collection and promotion done by Terrapinn. **Results are presented at the Identity Week Europe 2026** conference in Amsterdam.

- For **formal questions** related to this report, please reach out to **SonicBee** (info@sonicbee.eu)
- For **contact, comments or questions directed at the authors**, please connect with Henk Marsman or Jacoba Sieders directly via LinkedIn.

The European Digital Identity Wallet Ecosystem Explained

Digital identity in this survey report is understood as a national digital identification solution that follows the ideas expressed in the eIDAS 2.0 Regulation (2024/1183). A digital wallet, the European Digital Identity Wallet (EU DIW), is central to eIDAS 2.0. The ecosystem overview below shows actors playing a role and to whom we refer in this report; the five in the EU DIW Ecosystem that interact in the exchange of (qualified) data.

- **Wallet Provider:** provider of a technical digital wallet that adheres to all compliance requirements and as such is certified as a EU DIW.
- **Wallet Holder:** EU Member State citizens, or a legal entity residing in an EU Member State.
- **Issuing Party (IP)**: holds and issues data about the Holder. The Wallet Holder stores this in their EU DIW.
- **Relying Party (Verifier) (RP):** receives data out of the EU DIW, shared by the Wallet Holder, and provides services for which this data is required.
- **Oversight:** organised nationally by EU Member State governments, body/bodies that certify wallets and maintain registries (amongst others of Relying Parties).

Figure 2 The EU DIW Ecosystem

SURVEY THEME | **Benefits** **1** | 2

Who will benefit most?

Question

Who do you expect to have the **most benefit from the individual EU DIW**? (not the *business* wallet or *product passport*)

What type of use of the digital wallet do you expect will be most impactful (in terms of value, frequency of use, or other)?

What do you expect to be the most successful use of the EU DIW?

Respondents expect individuals and service providers to benefit most from the personal wallet.

Just over 40% of responding experts expect individuals to benefit most, which might indicate a point towards the benefit of a public, trustworthy alternative to identity solutions currently offered by bigtech providers and sovereignty for citizens against the increasing impact of these existing solutions. Just under 35% of responses suggest service providers to benefit most. For organisations, the main opportunity is expected to be in automation of onboarding processes, e.g. "Know Your Customer" (KYC) or Know Your Employee, and verification of diplomas or licenses, leading to fewer manual errors and lower operational costs and throughput times.

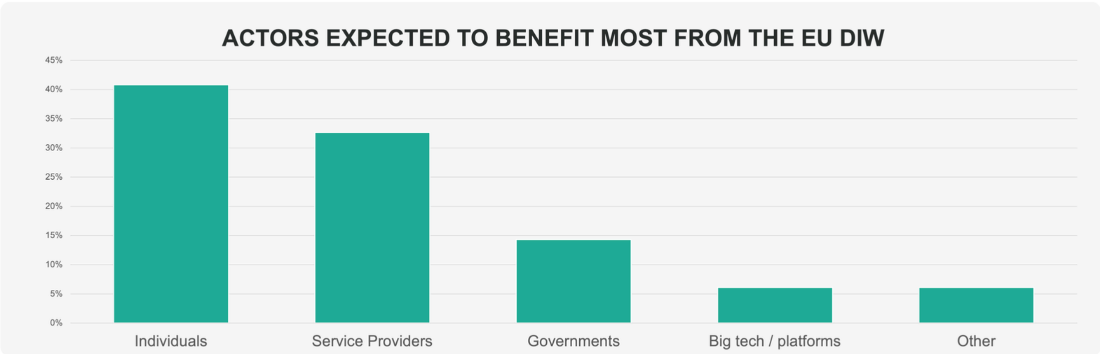

Figure 3 *Results question 'Who do you expect to have the most benefit from the individual EU DIW?'*

On the individual

As stated in the Regulation, the personal EU DIW is intended for citizens to regain control over their data online. Slightly over 40% of the respondents expect that individuals indeed will be the actor to have the most benefits from the personal EU DIW, as its intention is to place the power to control which data is shared where online, and how, in the hands of the user. According to respondents, this consists for example of enabling individual users to share only strictly necessary data (data-minimisation and selective disclosure). A big upgrade compared to current, centralised paradigms.

Individuals are expected to benefit the most from the personal EU DIW, in part because it aims to give people back control over when, where, and how their data is shared online.

On the service provider

Another actor the survey results suggest as one expected to have much benefit is the service provider. 33% of respondents consider these Relying Parties, those providing services to individuals, by whom data shared by individuals is used, to benefit most from the personal EU DIW.

Responding experts in the “Other” category either mention actors selling Identity Services in a SaaS model, or point out that they expect ‘more than one actor’ to benefit’, as opposed to just one.

SURVEY THEME | **Benefits** 1 | **2**

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Considerations and interpretations

With individual and service providers (Relying Parties) expected to benefit most, a majority of respondents seems to place the EU DIW's main value with actors at the 'end of the chain'.

This raises an important question on what's in it for actors – Issuing Parties – at the beginning of the chain. They are the ones that provide and manage the raw materials, data and attributes and credentials on which (the users of) wallet services depend. Without benefits and incentives for Issuing Parties to participate, the chain risks breaking before it can truly generate value for its end users.

It might be good to make the distinction here between voluntary issuers and mandatory issuers. The latter will exist regardless of available incentives and benefits and value propositions. These are organisations that are required to be an Issuing Party, such as government administration bodies.

However, we might consider this baseline (too) limited. If the EU DIW is to move beyond identity and authentication into supporting broader (types of) data attribute sharing, many more Issuing Parties may need clearer reasons to participate voluntarily.

Ultimately, that is where we could say that much of the wallets' intended benefits lie, and which was never fully achieved under the previous eIDAS Regulation. Unlike eIDAS1.0, the EU DIW and the actual adoption of one single identity solution across EU Member States has the potential to enable trusted data sharing for a range of use cases, including travel, banking, or education.

If realised, this could strengthen European integration and make European-wide, borderless interactions simpler and more seamless.

The 2025 responses in contrast

Even though this year, respondents had more multiple choice options compared to the three we gave them last year, across the board, the individual is still expected to benefit most from the EU DIW.

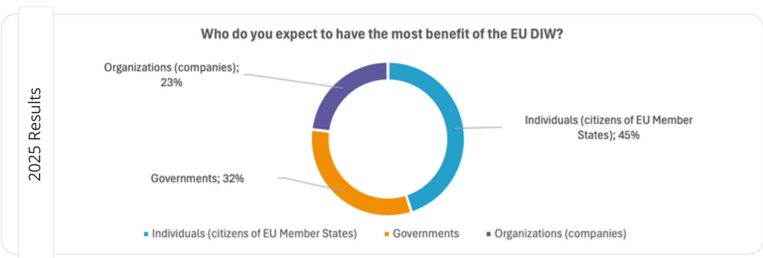

Figure 4 Most benefit - 2025 results

SURVEY THEME | **Benefits**

Impactful areas of use

Question

Who do you expect to have the **most benefit from the individual EU DIW**? (not the *business* wallet or *product passport*)

What type of use of the digital wallet do you expect will be **most impactful** (in terms of value, frequency of use, or other)?

What do you expect to be the most successful use of the EU DIW?

Individual use and organisational use are expected to be most impactful areas of use for the EU DIW

More than half of respondents expect the wallet for organisational use to be most impactful, closely followed by 43% of respondents expecting the wallet for individual use to be so. A few hold most impactful expectations for the product passport. This question addresses the use of the wallet for both personal use and business use.

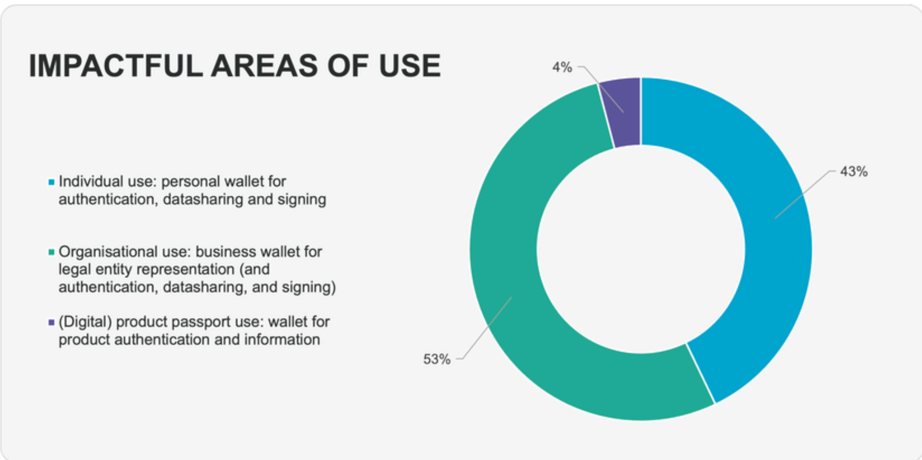

Figure 5 *Results question 'What type of use of the digital wallet do you expect will be most impactful?'*

Considerations and interpretations

The responses, compared against earlier versions of this report, suggest that organisational use (the business wallet) is increasingly considered to be impactful, particularly in terms of (economic) value.

Conversations with experts on these topics signal a more balanced split in expected impact and value. They explain the difference in that for the individual wallet, the impact is expected to be mostly in autonomy and control over personal data, and this for the organisational (business) wallet will be more economical (increased efficiency in administrative processes, reduced effort for Know Your Business, reduced risk profile).

The 2025 responses in contrast

Last year we saw personal authentication and data sharing expected to be most impactful areas of use. Individual use accounted for 73% of the responses then, and now this is 41%. Organisational or legal entity use went from 27% then to 55% now. Like last year, only a minority of respondents consider the product passport as a potentially impactful use case.

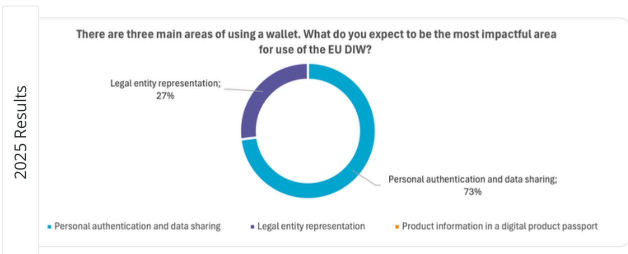

Figure 6 *Impactful areas of use - 2025 results*

SURVEY THEME | **Benefits**

Most successful use

Question

Who do you expect to have the **most benefit from the individual EU DIW**? (not the *business* wallet or *product passport*)

What type of use of the digital wallet do you expect will be **most impactful** (in terms of value, frequency of use, or other)?

What do you expect to be the **most successful use of the EU DIW**?

Sensitive logging in/authenticating with government (and related) (high value/risk) services, and sharing (any) data in general online, stand out.

Two use cases stand out as the respondents' expected most successful use case: logging and authenticating with government (and related) services, selected by 35%, and sharing (any) data online in general, selected by 31%.

Regular logging in was selected by 16% of respondents, which is notable because in conversations with experts, everyday use for regular services is often identified as the use case that could drive mass adoption.

Signing is expected to be most successful by the smallest number of respondents. While it may not happen all that much with the personal wallet, the potential for business use is significant. Enabling digital signing is a contributing success factor for the EUDIW. In combination with a passport grade ID, the signing will be a really valuable improvement to the current identity landscape.

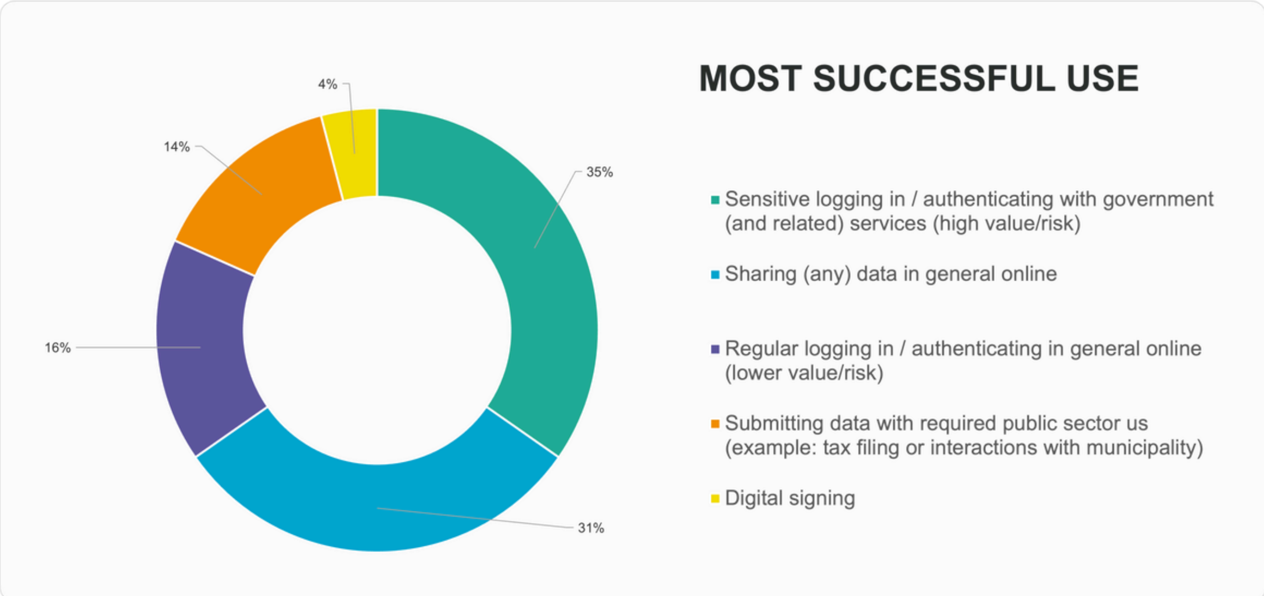

Figure 7 *Results question 'What do you expect to be the most successful use of the EU DIW?'*

Considerations and interpretations

Secure data sharing online is indeed one of the more pressing challenge that to this day remains difficult to make privacy friendly, secure, transparent, and trusted. We are, however, seeing signs that the EU DIW might help us overcome these challenges and present a useful solution, as well as for the other uses mentioned here.

SURVEY THEME | **Adoption** **1** | 2

Factors impacting adoption

Question

What factors do you consider to have the **most impact on the adoption** of the EU DIW?

From your perspective, how should the individual be supported to make responsible use of the digital wallet?

User experience (37%), relevant use cases (29%), and security/privacy (24%) surface as top drivers impacting adoption, alongside the need for widespread acceptance throughout the ecosystem.

This was an open question, inviting respondents to share their perspectives freely. With just under 50 respondents, this produced a variety of results and insights, mentioning over 72 different factors. We have grouped these into categories and have listed key take aways below.

- **37% of respondents mentioned the user experience (UX)** as a factor expected to have most impact on adoption of the EU DIW. How easy, practical and friendly is a wallet for the holder when they're using it? If the EU DIW is more complex than already familiar bigtech wallet solutions, such as Apple Wallet or Google Pay, respondents fear its adoption may struggle to find traction.

- Roughly one-third of respondents mentions the **'why factor'**, which we've categorised as the second main factor. This is about **relevant use cases**, like a digital driving license or daily banking, and respondents argue that providing people with a need a real reason to download and use the EU DIW, beyond it being mandatory, is essential.

- **Security and privacy** are not just technical requirements but are seen as major adoption drivers. If users don't trust the digital breach protection, they won't migrate (24%).

- There is a **strong emphasis on adoption, including the "Relying Party adoption"**, considering the wallet is only useful if it is accepted everywhere, from government offices to private businesses. This network effect and the growth of a mature ecosystem are a key condition for adoption across multiple use cases.

- Some mentioned **communication and public awareness campaigns** as potentially impactful, whereas availability (of the infrastructure) and the politics, the business model and the legal protection / liability are mentioned last.

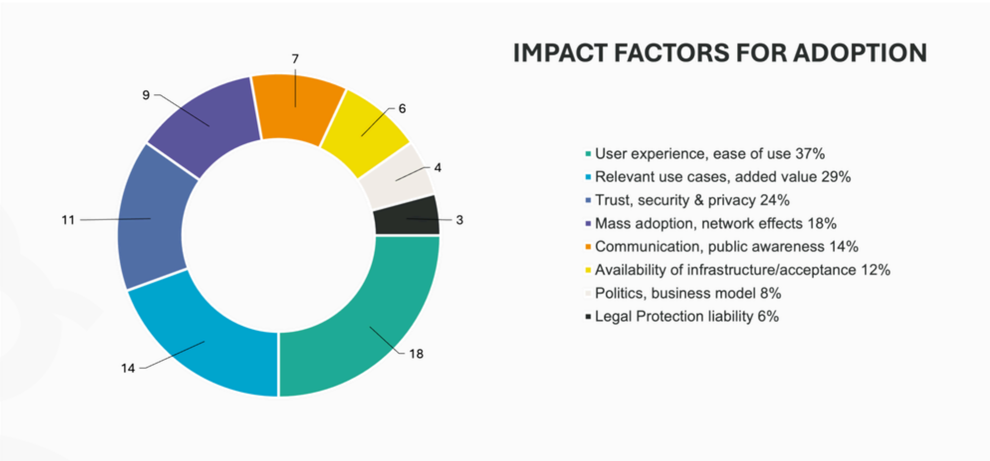

Figure 8 Results question 'What factors do you consider to have the most impact on the adoption of the EU DIW?'

SURVEY THEME | **Adoption**

1 | **2**

Factors impacting adoption

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User experience (37%), relevant use cases (33%), and security/privacy (24%) surface as top drivers impacting adoption, alongside the need for widespread acceptance throughout the ecosystem.

Considerations and interpretations

Somewhat expected, we see that the user experience and the benefit of use, through use cases, are considered most important for adoption. If we add trust to that, than over half of the experts indicate that this mix (UX, benefit of use and use cases, trust) is most important for adoption.

Also, it seems that, as of yet, it can be hard for ecosystem participants to map and oversee risks and liabilities that might come with adopting the EU DIW. What's more, if, at some point, participants can grasp risks and liabilities, they still need to decide if they're willing to accept those and become early adopters. All these considerations might cause participants to be more hesitant towards adoption.

What we do not see in the results is the legal mandatory acceptance for specific industries. While the EC does not keep it a secret that they aim to break the typical chicken-and-egg problem of digital identity services, it is not mentioned.

The 2025 responses in contrast

Last year, survey respondents also indicated that, for adoption, the end-user needs to understand why it is beneficial, and compelling use cases need to be available. The trust aspect (a reliable and secure wallet) was mentioned then as well. So far, no significant changes.

Responses towards public awareness and communication this year reiterate the importance of what was mentioned as a key role for governments in the 2025 survey repost: promotion adoption through public awareness campaigns (over 50% last year).

Interestingly, the survey last year also identified covering liabilities as a government role (over 30%) where the legal provision and liabilities this year are only mentioned by 6%.

Finally, we saw in the last year survey responses that expertise and knowledge for the larger actors, mainly the Member State Administrations and the service providers, was identified as a requirement for success. There were no mentions of this in the open field responses this year. Perhaps this aspect was not strongly related to adoption, but more important for deployment and operation.

SURVEY THEME | **Adoption** 1 | 2

Supporting responsible use

Question

What factors do you consider to have the **most impact on the adoption** of the EU DIW?

From your perspective, how should the individual be supported to **make responsible use** of the digital wallet?

Training and education, user interface and wallet design, and safeguards may help users most in using the digital wallet responsibly.

As in earlier years we have specific attention for the values of autonomy, privacy and protection for the individual, as these are highlighted by the European Commission and form an integral part of the eIDAS Regulation.

In order to have control over personal data the individual also needs to be equipped to bear that responsibility. The respondents indicate that a major part of supporting individuals and preparing them for that responsibility is training and education, by over a third. A quarter of the respondents mention the user interface and alerts and notifications in the wallet.

Just under 10% of the respondents highlighted covering the liabilities through legal solutions, providing insight and transparency of the actual data exchanges, and the blocking of inappropriate or irresponsible use.

The bucket of 'other responses' included ease of use, giving preference to responsible use paths, embedding the functionality in existing services, and multiple options from the choices available.

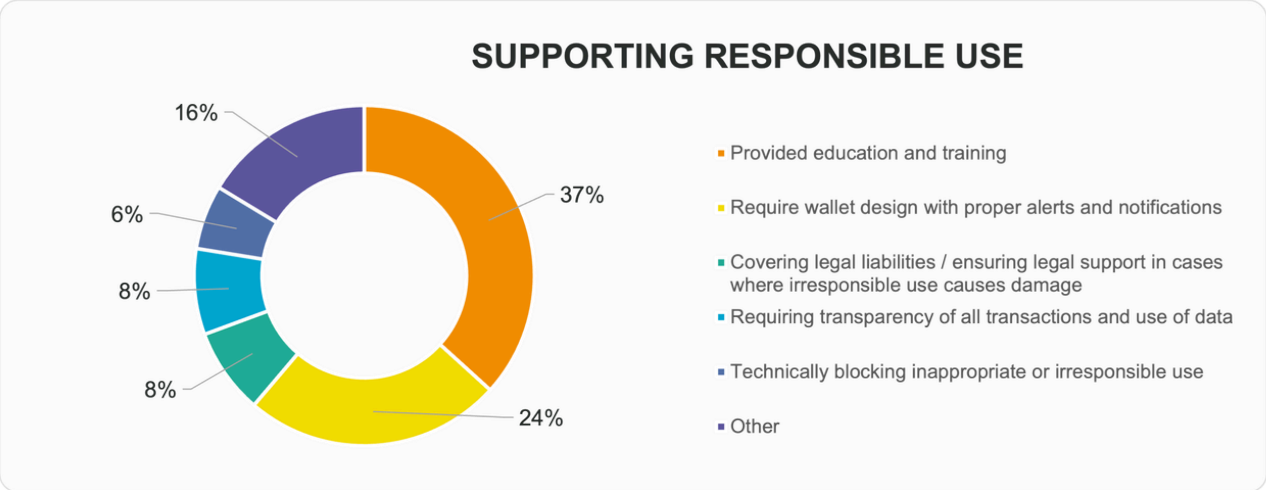

Figure 9 *Results question 'How should the individual be supported to make responsible use of the digital wallet?'*

Considerations and interpretations

We see from the results that the experts feel that being aware (through notifications) and then knowing what these notifications mean and how to judge them, is key for individuals to make responsible use of the wallet. We know that this approach is challenging, although it may be the best way forward.

SURVEY THEME | **Adoption**

1 | **2**

Supporting responsible use

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From your perspective, how should the individual be supported to **make responsible use** of the digital wallet?

Training and education, user interface and wallet design, and safeguards may help users most in using the digital wallet responsibly.

A small group of experts sees blocking sharing as an option. This raises the question what responsible sharing is, and who decides on what this is or not. Although there is no simple answer to 'what makes use responsible' these insights do help us start that conversation.

To use an analogy of driving cars; we have now many drivers of cars, and they are trained, educated and even need to pass driving exam tests. We don't expect 'using the EUDIW tests' to become mandatory, but we do think that similar to driving there is a large responsibility on knowledge and competence of the user. Yet on the other hand it is impossible to use the road with a car without brakes or an airbag. So shouldn't we expect some 'guard rails' on the wallet to appear, over time just as for the automobile, that will prevent clear irresponsible use. And at the same time leave space for the individual's judgement in all other cases.

The 2025 responses in contrast

Last year half the respondents indicated the user interface to be key in supporting the user to make responsible decisions on data sharing. This is now replaced by knowledge and awareness.

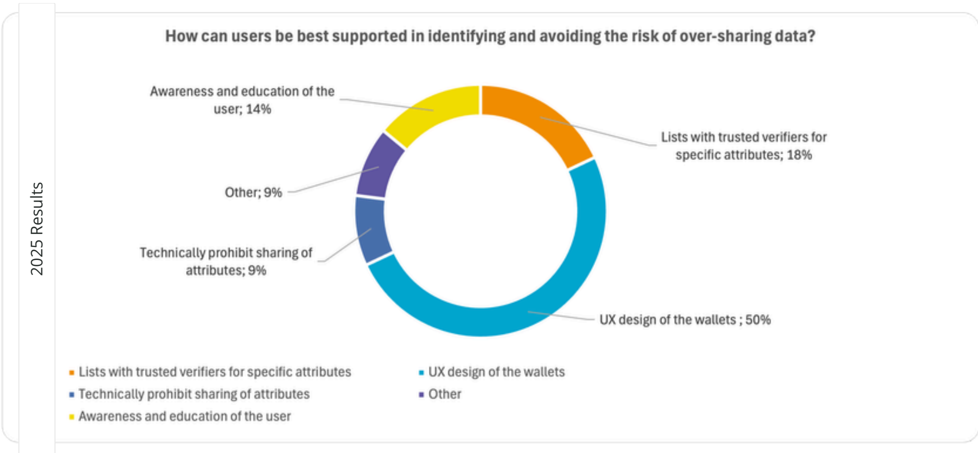

Figure 9 Supporting responsible use - 2025 results

Primary use of the EU DIW

Question

What do you expect the **business model of the EU DIW** and the use of the wallet to be primarily?

What keeps issuing or relying parties to implement EU DIW capabilities when they are not legally obliged to work with the EU DIW?

A majority of respondents expects the primary business model and use of the wallet to be government funded. Only a few see commercial models.

Most respondents expect the primary business model for the EU DIW to be government funded. Second is a pay-per-transaction model. Another business model mentioned often is a pay-per-transaction model. Next to those, a third business model where additional (revenue generating) services are bundled to the EU DIW is suggested as expected to be primary also, and only a few see a subscription based model.

From our conversations in the industry we recognise the struggle to design a commercially attractive business model in the EUDI ecosystem. If that remains too difficult the result may be that all EU DIWs will be government issued. One respondent indicated that this may be at least so for the first five years, after which commercial models may be introduced or applied.

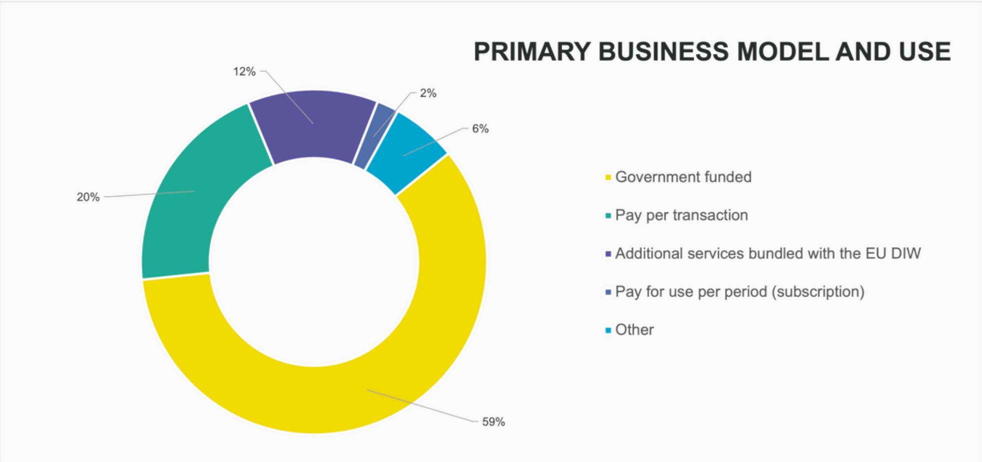

Figure 10 *Results question 'What do you expect the business model of the EU DIW and the use of the wallet to be primarily?'*

Considerations and interpretations

eIDAS 2.0 and its ensuing national regulations are meant to drive an open, fair, secure and interoperable ecosystem that protects its users/participants. In so doing, it holds strong requirements and restrictions on user charges, using metadata, combining roles, and redistributing value across digital wallet providers. At the same time, those requirements make it challenging to develop healthy, sustainable and commercially attractive business models, outside of those funded and subsidised by government.

As such, we're seeing that, for the most part, governments themselves are taking the lead in solution development. Sometimes with the invitation to the private sector to get involved and join a public-private partnership. However, willingness for private parties to participate, either through a partnership on by developing their own solutions, rests in part on the attractiveness of the business model for them to do so.

SURVEY THEME | **Business Model** 1 | **2**

Primary use of the EU DIW

Question

What do you expect the **business model of the EU DIW** and the use of the wallet to be primarily?

What keeps issuing or relying parties to implement EU DIW capabilities when they are not legally obliged to work with the EU DIW?

A majority of respondents expects the primary business model and use of the wallet to be government funded. Only a few see commercial models.

In any case, as the ecosystem searches for business models, many avenues are being explored. Responses suggest promise in a transaction-driven business model (20%), as well as in bundling additional, commercially interesting services to the EU DIW that might balance the cost of providing digital wallet services (12%). In conversations with experts we see various innovative and old alternatives being explored, including the analogy to 'postal stamp' model.

We're excited to see what models develop around the tension of what's possible and what's allowed.

SURVEY THEME | **Business Model** 1 | 2

Hurdles for Issuing and/or Relying Parties

Question

What do you expect the **business model of the EU DIW** and the use of the wallet to be primarily?

What keeps **Issuing or Relying Parties** to implement EU DIW capabilities when they are **not legally obliged** to work with the EU DIW?

Main hurdles keeping non-legally obligated Relying and Issuing Parties are considered to be in clarity; either in benefits of use, or in requirements and liabilities.

Uncertainty of benefits of use (35%) for Issuing and Relying Parties is mainly expected to keep these actors from implementing EU DIW capabilities when they are not legally obligated to do so. Another hurdle the responses consider for these actors, is that they may be faced with many questions still around specific requirements and potential risks / liabilities that come with implementing EU DIW capabilities (20%). Lastly, we can see that experts expect hurdles for these actors to be in the efforts and investments needed before such implementation of capabilities, either because it is unclear what these efforts would be exactly or because the level of expertise and knowledge required lacks. A few respondents consider a perceived decrease in customer experience and them already having implemented capabilities for working with non-EU DIWs as main hurdles.

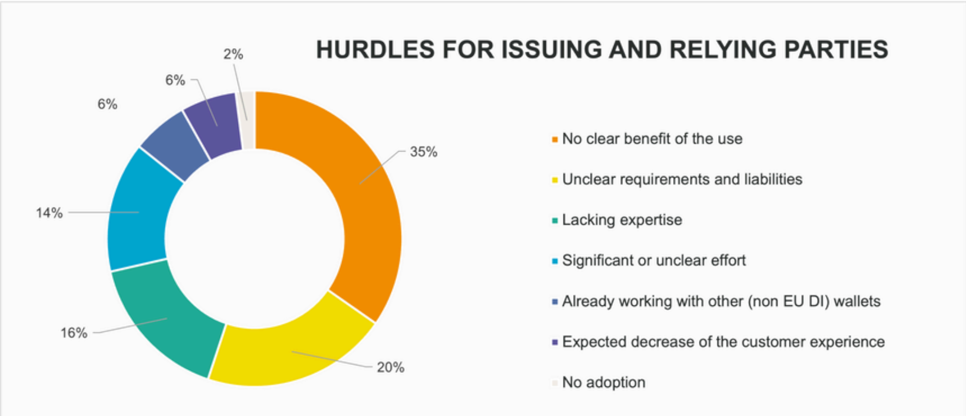

Figure 11 Results question 'What keeps issuing or relying parties to implement EU DIW capabilities when they are not legally obliged to work with the EU DIW?'

Considerations and interpretations

A healthy ecosystem needs all kinds of participating Issuing Parties and Relying Parties, not just the legally obligated ones, and these non-legally obligated actors can be expected to look for healthy business cases and attractive commercial models before deciding to join and make efforts and investments towards doing so. Investments that can be quite significant also, for example adapting back office processes, finding and training skilled staff to execute such implementation. At the same time, the ecosystem might need these investments first so it can mature, scale and start to bring forst such business cases. Without clear business cases, and this is where we're finding ourselves in a bit of a *chicken-and-egg-situation,* early commercial ecosystem investment decisions can be hard to justify.

If we are to summarise all hurdles mentioned in responses into one word we would say this word is clarity. Responses suggest that currently, unclarity exists around many important factors for consideration; benefits of use, cost-benefit equations, requirements, risks, liabilities, required effort, and more, all potentially keeping Issuing and Relying parties from implementing EU DIW capabilities.

Hurdles for Issuing and/or Relying Parties

Question

What do you expect the **business model of the EU DIW** and the use of the wallet to be primarily?

What keeps **Issuing or Relying Parties** to implement EU DIW capabilities when they are **not legally obliged** to work with the EU DIW?

Main hurdles keeping non-legally obligated Relying and Issuing Parties are considered to be in clarity; either in benefits of use, or in requirements and liabilities.

So, the question to be answered for non-legally obliged IP and RP considering early adoption and implementation is 'What's in it for us?'. Especially in a free market, with autonomous choice and no legal obligation, implementing EU DIW capabilities should benefit them in some way shape or form.

The 2025 responses in contrast

The challenges and barriers last year were similar:

- No defined business model that benefits everyone
- Unawareness and underestimation of the effort to work with the EU DIW
- Sufficient services and participants to become sustainable
- Security and privacy concerns
- There is no one-size-fits-all approach possible
- International cooperation

SURVEY THEME | **Challenges & risks** **1** | 2

Largest challenges for MS in meeting deadlines

Question

What do you see as the **largest challenges EU Member States face** at the moment, in trying to meet the eIDAS deadlines?

How many of the 27 EU MS do you expect to have an individual EU DIW available by December this year?

What do you see as the greatest risk or topic of concern not addressed currently for the EU DIW?

Challenges for Member States in meeting eIDAS deadlines come from a range of perspectives, mainly to do with uncertainty, lack of clarity, and making the wallet operational.

This was a multiple choice question with a maximum of three selections and an open and free-form "Other" field. This resulted in over 120 concerns of note in total. We clustered and categorised all responses into main themes based on how often they occurred in the data, and present them here in the summary you're seeing below.

- **Unclarity of ecosystem realisation.** Respondents point to an unclear vision for how the national wallet ecosystem should function (operable within and across the EU, as well as around the world), the complexity of establishing national certification schemes, and ongoing changes to legislation and the ARF on the EU level. Together accounting for almost half the mentions in the results, these are considered some of the largest challenges for Member States in trying to meet the eIDAS deadlines, as it adds to uncertainties around what needs to be built, how to make the wallet operational, certified, governed and delivered.

- **Lack of skills and expertise.** Delivering national wallets and timely operationalising them requires having enough of the right kind of skills and expertise and people, for example in technical and legal domains. Currently, responses suggest that Member States lack these, which thus makes presents a challenge for Member States meeting their deadlines.

- **Financials and funding.** Constraints and mentions here concern mostly the government budget made available for realising their national wallets, establishing attractive business models, and funding of wallet solutions. Questions and concerns around possible financing models make it even more important to address potential business models by EU MSs.

Also, some responses share concerns with regards of the 'image' of the EU DIW and scepticism towards EU initiatives, national initiatives, digital developments in general, and the perception of the digital identity wallet as hurdles MS will have to recognise and address.

Separate specific concerns included: fear of "scope creep" (adding too many functions beyond the original purpose), (ending up with) 27 different variations of the EU DIW being developed by all 27 Member States that might not reflect one single, clear European solution, and lack of citizen awareness, interest, and unfamiliarity with the possibilities.

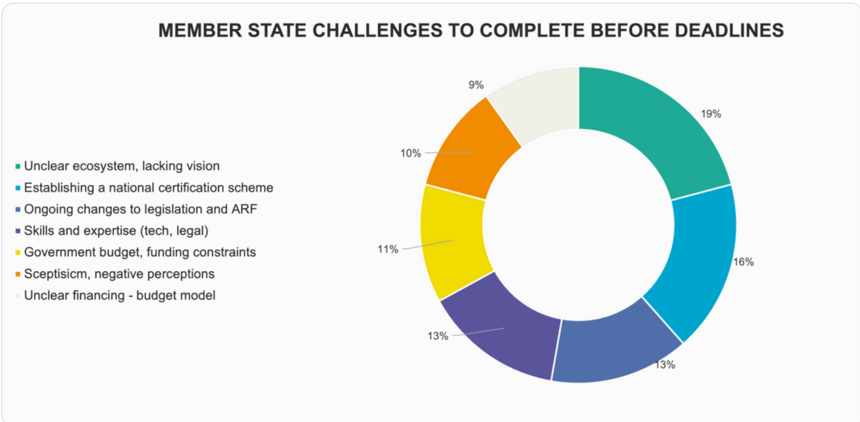

Figure 12 *Results question 'What do you see as the largest challenges EU Member States face at the moment, in trying to meet the eIDAS deadlines?'*

Largest challenges for MS in meeting deadlines

Question

What do you see as the **largest challenges EU Member States face** at the moment, in trying to meet the eIDAS deadlines?

How many of the 27 EU MS do you expect to have an individual EU DIW available by December this year?

What do you see as the greatest risk or topic of concern not addressed currently for the EU DIW?

Challenges for Member States in meeting eIDAS deadlines come from a range of perspectives, mainly to do with uncertainty, lack of clarity, and making the wallet operational.

Considerations and interpretations

We typically need a direction before we start moving. Otherwise, what are we moving towards? As such, it does not seem too surprising that a perceived lack of clarity on the end state of the EU DIW, a vision of and ambition for what it could and should be, and, more importantly, how this all might be operationalised, is suggested by such many respondents as large challenges for EU Member States trying to meet eIDAS 2.0 deadlines.

The 2025 responses in contrast

Challenges shared in the 2025 survey responses included unclarity around the business model and business case, interoperability issues, and the complexity of the ecosystem, as well as the requirement for expertise and skilled staff. This year, we see that the establishment of a national certification scheme is mentioned as a challenge, and 'sentiment' amongst various audiences related to the EU DIW as well. It seems that the challenges suggested now have more to do with adoption and use of the wallet, and less with development and technicalities. As we're getting more familiar with the tech around the EU DIW and the EUDI ecosystem, we start to consider more concretely the context the tech has to fit into and work within.

SURVEY THEME | **Challenges & risks**

Readiness individual EU DIW by December 2026

Question

What do you see as the **largest challenges EU Member States face** at the moment, in trying to meet the eIDAS deadlines?

How **many of the 27 EU MS** do you expect to have **an individual EU DIW available** by December this year?

What do you see as the greatest risk or topic of concern not addressed currently for the EU DIW?

Expectations around Member State readiness towards the eIDAS 2.0 deadline by the end of the year range from 0 to 21, in relatively distributed percentages for each of the option.

Almost one third of respondents expect 8 Member States to have their individual wallet available by december this year, and there are more respondents below that than there are above.

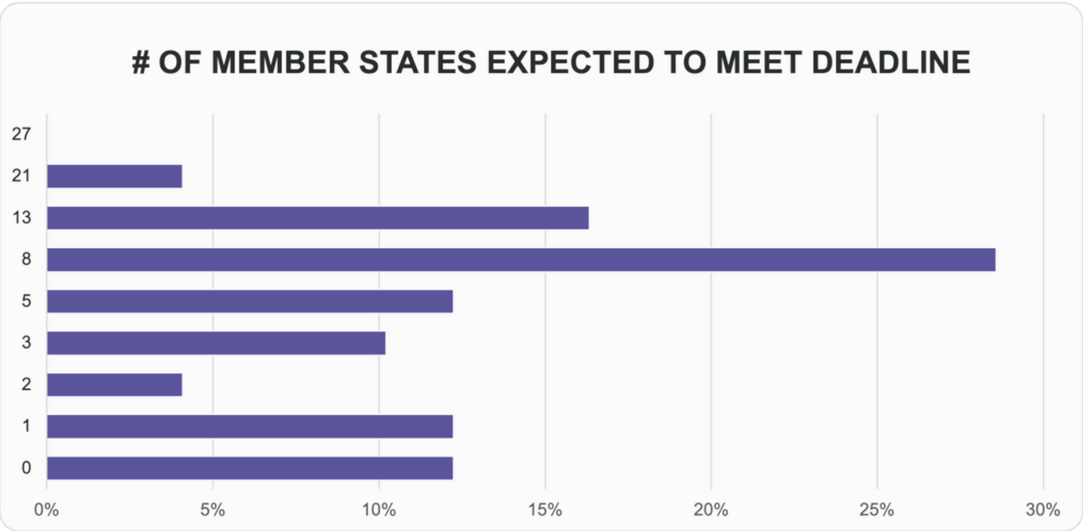

***Figure 13** Results question 'How many of the 27 EU MS do you expect to have an individual EU DIW available by December this year?'*

Considerations and interpretations

To become available, a wallet must be certified by a legally acknowledged certification body and be tested against the certification scheme. There is still a lot of work to be done to establish these. A [Draft Candidate Security Certification] scheme has been published, with a public review deadline of 30th April 2026. It will still take months before certification of the personal EU DIW is possible. The business wallet, however, is a different animal and has different requirements, including certification. We expect the personal wallet to meet the deadline in a few Member States, but there will be numerous business wallets active by the end of 2026.

Next to that, we also recognise there are discussions on what being ready means in terms of 'what wallet will be released'. The consensus seems to be that if any wallets are released, they will have a minimum set of functionalities.

What is still left to be addressed?

Question

What do you see as the **largest challenges EU Member States face** at the moment, in trying to meet the eIDAS deadlines?

How **many of the 27 EU MS** do you expect to have **an individual EU DIW available** by December this year?

What do you see as the greatest **risk or topic of concern not addressed currently** for the EU DIW?

This question yielded a wide range of types of concerns. As open question, its outcomes signal a range of topics, risks, and areas of concern that remain unaddressed. Responses show that EUDI is truly an ecosystem, covering governance, legislation, processes and technology. The section below summarises all responses, clustered in topic categories. Note that this compilation of risks results from brief responses to our survey. They may provide a sense of direction for thinking about risks, but all warrant further conversations, exploration, and identification of the underlying reasons and measures to address them.

1. **Lack of a value proposition and unclear business models for participants in the ecosystem** (for the holder, the digital wallet provider, the Issuing Party (attestation provider), and early adopters in general). It is a complex ecosystem, and many actors need to participate, while the benefit overall, and for each participant, is suggested to be unclear, not clearly communicated, or even unknown. One respondent states that the digital wallet provider may face liabilities (for misuse, for example), and it is unknown how these can be addressed. Without concrete evidence yet of EU DIW benefits, early adopters may be hesitant to join in and start innovating. *– 18%*

2. **Cost of adoption and lack of adoption, and digital wallet usability.** This includes the potential overload of approval requests users will face (similar to cookie-consent pop-ups of websites). Respondents share they feel the legislator does not seem very concerned with the adoption. A specific hurdle mentioned is in current ways of working and in existing systems. These can be experienced as 'entrenched', and so raises the question 'how will the EU DIW penetrate the market for digital identification and data-sharing, beyond where it is a legal obligation?' - a relevant consideration given that in many sectors there is no legal obligation to use the EU DIW, which underscores the need for other incentives to ensure adoption. *– 14%*

3. **Absence of (early) communication around the EU DIW.** Currently we're not seeing much active communication or promotion of awareness around the EU DIW from governments yet. Respondents raise this as a concern because it may be interpreted as a sign of low commitment. Ecosystem complexity makes clarity essential, also with regards to national decisions required to implement the eIDAS 2.0 Regulation, and in the absence of that, we may risk misinformation filling in gaps. Most MS not seeming to be meeting Regulation deadlines is also not promising. *– 12%*

4. **Availability of information and educational resources.** As long as this remains insufficient, the concern is that it leads to unawareness among stakeholders and hesitant early adopters, which we need to build a healthy and sustainable ecosystem.

5. **Interoperability of the EU DIW outside of the EU.** Four responses indicate the risk of credentials issued within the EU not being recognised outside the EU, and how the perceived added value of the EU DIW may be limited in comparison with existing eID solutions. *– 8%*

6. **AI and bigtech.** Some respondents raise concerns about the application of Artificial Intelligence (AI), others about bigtech regarding the security of devices and the competition among bigtech wallets. These wallets may not be expected to have the eIDAS safeguards, but are expected to be more attractive to end users because of their ease of use. *– 8%*

What is still left to be addressed?

Question

What do you see as the **largest challenges EU Member States face** at the moment, in trying to meet the eIDAS deadlines?

How **many of the 27 EU MS** do you expect to have **an individual EU DIW available** by December this year?

What do you see as the greatest **risk or topic of concern not addressed currently** for the EU DIW?

7. **Complexity of eIDAS Regulation and EUDI ecosystem.** Relying Parties may find it difficult to integrate the EU DIW with other data-sharing methods, potentially reducing adoption. Competition with other data sharing methods (such as email or webforms) is mentioned a few times as well. Now that the tech is becoming clearer, attention shifts to how to deploy and use it, addressing actual use cases with real-world complexity. Some mention that the wallet is too complex (and rigid) to use as well. So complexity introduces risks for end users, for the RP, and for being a competitive method for data sharing. – *8%*

8. **Scalability and vendor lock-in.** Respondents express concerns about the ecosystem's scalability and whether it can avoid vendor lock-in (e.g., whether it can truly become an open ecosystem). This relates to how we need to keep the bigger picture of the wallet's use in mind across many scenarios to avoid tunnel vision on technology and happy flows. – *4%*

9. **Dependence of EU DIW on underlying national identity schemes as EUDI foundation.** Registers of citizens and residents in Member States are the basis of the identities in the EU DIW. If these national systems prove not to be robust, this may impact the EU DIW negatively. One indication in the responses suggests that these systems need to establish and maintain a high level of quality. This signals that the EU DIW is not merely a technical solution, or even a functional one; it is an ecosystem in which other artefacts and ecosystems play a (foundational) role. – *2%*

Besides these, risks related to the design of the trust framework were mentioned, including abuse by fraudsters, accountability, and competition from uncertified wallets (also from big tech).

Considerations and interpretations

The risks described show that the EUDI is a complex socio-technical project that includes legislation, technology, society, behaviour, and innovation development, each with risks, and the combination of these adds even more risks. There is no silver bullet to address these, so all actors in the ecosystem need to find a way forward, jointly addressing risks as they emerge and sometimes stepping slightly beyond their formal accountability to realise a greater good.

The 2025 responses, in contrast

In 2025, respondents also mentioned the lack of a good business model. The wallet backup was mentioned as well, and the user journey in case of an unhappy flow is quite complex in an ecosystem with many participants. Significant efforts for RP’s and IP’s were mentioned as well (similar to this 2026 survey under question 5), along with concerns about friction and UX. Security, privacy, and the lack of public advocacy and awareness are also mentioned.

ABOUT THE EXPERTS

Level of experience and knowledge

Over 100 experts were invited to participate in our fourth annual State of the EU Digital Identity Wallet survey report. All of them were involved with this topic and were experts in one or more of its aspects. Half of the respondents were either a speaker or panellist at the Identity Week Europe 2025 edition on topics related to the Digital Identity Wallet. The other half were experts from our wider network.

The survey gathered responses from 49 experts. These respondents bring considerable experience spanning multiple domains: the EU DIW, digital identity wallets, ecosystems, national contexts, and regulatory frameworks. More than 80% of them have at least 4 years of experience with this topic, with 40% having roughly a decade of experience in this field.

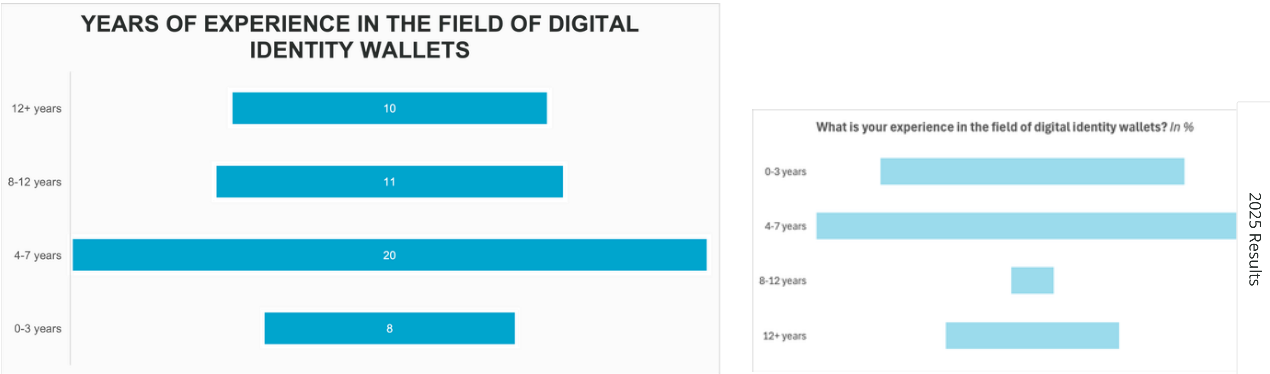

Figure 14 Subject-matter experts: years of experience in the field. 2026 left, 2025 right.

Organisation representation and region

Participating experts come from across the ecosystem and represent multiple organizations. The majority of which are governments or regulators, followed by wallet providers. Consultants, Relying and Issuing Party, solution providers and tech vendors, certification bodies and a foundation are also represented. Most respondents are in the European region, five are from the Americas region, and none are from other regions around the globe.

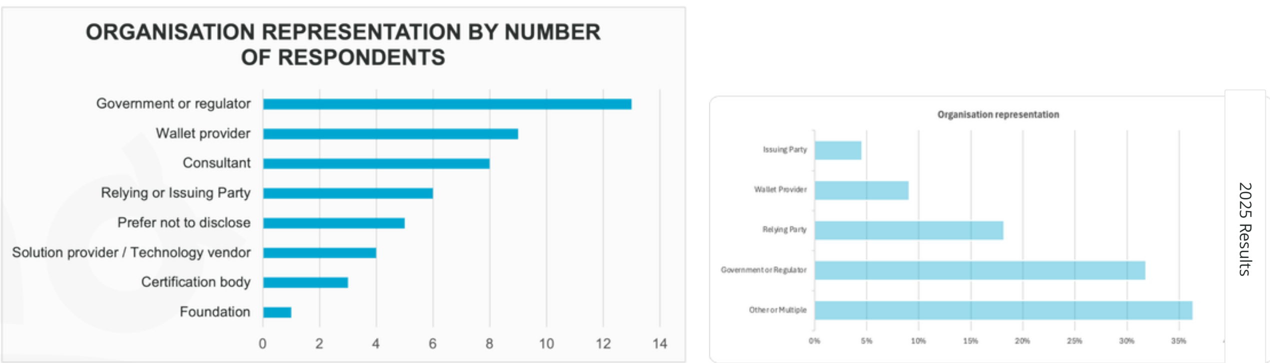

Figure 15 Subject-matter experts: organisation representation. 2026 left, 2025 right.

ABOUT THE EXPERTS

Named contributors (with permission)

Experts that have participated in our survey this year and shared their permission for being named as contributor in the report are listed below. We have great gratitude for all, including the ones that wished to remain anonymous, for taking the time to share their knowledge, expertise and perspectives.

- Ronny Khan
- Ivan Marin
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- Victor Asanmi
- Annet Steenbergen
- Henk Marsman
- Jacoba Sieders
- Jay Meier
- Jon Shamah
- John Erik Setsaas
- Eric le Ven
- Marnix van den Bent
- Vincent Jansen
- Poppe Wijnsma
- Mike Alders
- Victor van der Hulst
- Dick Hardt
- Steve Pannifer
- Esther Makaay
- Martin Sandren
- Richard Oliphant
- Priya Guliani
- Shiv Aggarwal
- Alexander van den Wall Bake

Authors of the report

Henk Marsman

Principal consultant at SonicBee on Cyber Security, IAM, CIAM, and PAM. Managing programmes and projects with much experience in complex and/or political environments and multi-year initiatives. Independent researcher on digital identity, ethics and value sensitive design. Public speaker on digital identity, inclusive and fair design, and trends and developments.

Connect with Henk on LinkedIn →

Jacoba Sieders

Digital identity evangelist since decades, eager to make digital life better and a lot more secure than it is today! Energetic, creative personality, strategic thinker, networker with international orientation and experience. Keynote speaker at international IAM congresses, teacher of masterclasses. Running strategic identity assignments on request, speaking at Identity and security events, next to some Advisory Board roles.

Connect with Jacoba on LinkedIn →

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Earlier State of the EU DIW Expert Survey Reports

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- 2024: https://www.sonicbee.eu/2024-state-of-the-eu-digital-identity-wallet-expert-survey-report/
- 2025: https://www.sonicbee.eu/2025-state-of-the-eu-digital-identity-wallet-expert-surveyreport/