

Roberto Viola
Director-General, DG CNECT
European Commission
Avenue de Beaulieu / Beaulieulaan25
1160 Brussels, Belgium

Brussels, 7 December 2021

Re: AmCham EU calls for a proper stakeholder consultation mechanism on the Common Toolbox for the EU Electronic Identification scheme (eID)

Dear Mr Viola,

I am writing about the ongoing work on the EU eID “Common Toolbox” carried out by the eIDAS expert group, as part of the EU Electronic Identification scheme (eID) proposal, to draw your attention to the absence of a proper stakeholder consultation.

AmCham EU represents a broad variety of industry sectors, from ICT to financial services companies which have gained, over the years, first-hand experience in developing private digital wallets and using digital attributes to provide consumers with innovative services. We strongly support the development of a harmonised framework, building upon international standards, that provides a high degree of data protection, while offering digital solutions that are appealing, compelling and suit users’ needs to foster acceptance without resorting to mandatory acceptance. AmCham EU’s members are eager to inform the policy debate by building upon practical experience, both on the technical architecture and the use cases currently being discussed by the experts.

We regret that no public consultation mechanism has been foreseen, though several Member States expressed an interest in getting feedback from stakeholders. We appreciate that national experts could independently seek additional information from third parties, however, this does not constitute a proper consultation mechanism that provides all stakeholders with an equal and concrete opportunity to express their views.

As the national experts are working against a tight timeline, with key orientations to be adopted by 16 December, inputs could only be valuable and relevant if shared in a timely way, therefore we call on DG CONNECT to take swift action to remedy the current situation. We look forward to contributing further to the ongoing regulatory debate.

Yours sincerely,



Roger Coelho
Policy Director
AmCham EU