

= for further comments and corrections =

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EPSM SCA WG

View on the new European Digital Identity Framework (EUDI Wallets, eIDAS2.0): eIDAS2.0 not mandatory for card acceptance at the POS and in e-com

*Based on the updated **European Digital Identity Framework**
(Regulation (EU) 2024/1183 of the European Parliament and of the Council, of 11 April
2024, amending Regulation (EU) No 910/2014 as regards establishing the European Digital
Identity Framework), published 30 April 2024:*

The following reasoning might apply:

1. **Recitals are non-binding**, only the later text within the regulation is binding.
(to Recital 62: "...or to support the fulfilment of strong customer authentication requirements for online identification for the purposes of account login and of initiation of transactions in the field of payment services.")
2. The text speaks in Article 5f 2. (shortened) only of **authentication for an online identification**:
"Where private relying parties that provide services... are required by Union or national law to use strong user authentication for online identification ..., those private relying parties shall, ... also accept European Digital Identity Wallets that are provided in accordance with this Regulation."

But PSD2, Article 97 1b, Authentication, regulates **authentication applied to initiation of a payment transaction**:

Member States shall ensure that a payment service provider applies strong customer authentication where the payer: ...

b) initiates an electronic payment transaction;

3. **In conclusion:**
The authentication for an online identification is not the same as the authentication for a payment transaction initiation.

Therefore, our current view:

The scope of the European Digital Identity Framework obligations in Article 5f 2. **does not** cover card payment transaction SCA requirements under PSD2 Art 97 1b ("SCA for initiating payment transaction"). This means that, the implementation of EUDI Wallet solutions (eIDAS2.0) is not mandatory for card accepting merchants at the POS and in e-com.

=> EU Digital Identity in card payments should be an option, not a must.