

TECHNICAL CIRCULAR

Ref. DC2025SPM189

Milan, 22-12-2025

To all accredited and applicant Certification Bodies
To the associations of Conformity Assessment Bodies
To the Assessors/Experts of DC Department
Their offices

SUBJECT: Technical Circular DC No. 45/2025 – Rules for Transition and Initiation of Accreditation under EU Regulation 2024/1183 (so-called eIDAS2) in accordance with UNI CEI EN ISO/IEC 17065

Introduction

This document provides provisions and guidance for the accreditation of Certification Bodies operating in conformity with UNI CEI EN ISO/IEC 17065 for the certification of services under EU Regulation No. 910/2014, as amended by EU Regulation 2024/1183, concerning electronic identification and trust services for electronic transactions. The present provisions repeal and replace those previously issued through Technical Circulars DC Nos. 09/2016, 08/2017, and 28/2023.

The legislative framework governing electronic identification and trust services is undergoing a profound transformation with the entry into force of EU Regulation 2024/1183 on 20 May 2024 and the application, from 18 October 2024, of Article 42 of EU Directive 2022/2555 (the so-called “NIS2”). These legislative measures amend EU Regulation 910/2014, strengthening and expanding the scope of Conformity assessment bodies accredited under EC Regulation No. 765/2008, and leading to the inclusion of trust services among the essential services as defined in Article 3(1)(b) of EU Directive 2022/2555.

Following the update of the eIDAS Regulation, the Member States are responsible for implementing the electronic identification (eID) system that will be recognised at the European level. They must also ensure that digital identities and trust services issued at the national level comply with the requirements of the Regulation and can be used throughout the EU. For this purpose, the Regulation also establishes specific obligations for private enterprises, public organisations, and institutions providing electronic services or using identification systems and trust services, concerning the adoption of electronic authentication systems and qualified electronic certificates to ensure the integrity and security of digital transactions.

The Regulation applies to both the public sector (government bodies, public services) and the private sector (banks, insurance companies, telecommunications operators, etc.), as they are involved in the use or provision of services based on electronic identification and trust services. Both sectors will be required to adopt the necessary measures to accept regulated digital identities and trust services.

The recent EU Implementing Regulation No. 2025/2162 of 28 October 2025 has established the rules relating to the accreditation of Conformity assessment bodies performing the assessment of qualified trust service providers and the qualified trust services they provide. This Circular sets out ACCREDIA's provisions for the implementation of this act.

Regulatory Framework of Reference

The update of EU Regulation No. 910/2014 introduced by EU Regulation 2024/1183 brings several new developments, including:

1. **Expansion of Trust Services:** in addition to the trust services already included, new services such as electronic attestation, electronic archiving, and distributed ledgers have been added. Greater emphasis is placed on the security and interoperability of these services at the cross-frontier level. Furthermore, more stringent requirements are introduced for Qualified Trust Service Providers (QTSPs), particularly regarding risk management and protection against security threats (in close connection with EU Directive 2022/2555 (NIS2), which classifies trust service providers among essential entities).
2. **Increased Focus on Security and Data Protection:** with the growing use of digital identification, the new Regulation establishes higher standards for the protection of personal data. Robust safeguards are provided to ensure that data processing complies with the principles of data minimization and privacy by design.
3. **European-Level Interoperability:** the new Regulation emphasizes the interoperability of electronic identification solutions and trust services across Member States, through the promotion of common technical standards and cooperation between States to facilitate cross-frontier integration. The aim is to ensure that citizens and businesses can use their digital identities and trust services seamlessly in all EU countries.
4. **Strengthening Member States' Responsibilities:** the amending Regulation requires Member States to develop secure, high-quality technological infrastructures to support the issuance of digital identities and the provision of trust services. Member States must also monitor and verify the compliance of trust service providers. Furthermore, enhanced cooperation is required between the competent authorities of the Member States and the European Commission to ensure regulatory compliance and uniform management of digital identities at the European level.
5. **Improving Accessibility to Public and Private Digital Services:** one of the main objectives of the update introduced by the new Regulation is to facilitate European citizens' access to digital services provided by public authorities and private companies in a secure manner, without geographical or technological barriers.
6. **Introduction of the European Digital Identity Wallet (EUDI-Wallet):** one of the most significant innovations is the introduction of the European Digital Identity Wallet (so-called EUDI-Wallet), an application that enables citizens and businesses to securely manage and provide their personal data and digital documents to third parties across the EU. This tool aims to simplify access to both public and private online services while ensuring high standards of security and privacy. The wallet will be issued by Member States or EU-recognised providers and must be accepted throughout the EU. This service is currently outside the scope of

accreditation, pending the availability of the relevant implementing acts (see Article 20(4) of Regulation (EU) 2024/1183).

Without prejudice to the provisions established by ETSI EN 319 403-1 v2.3.1, EU Implementing Regulation No. 2025/2162 has introduced additional rules for accreditation. In addition to the provisions of ETSI TS 119 612, the following services are included within the perimeter of certification, and therefore within the potential scope of accreditation, with their technical standards specified in the relevant Implementing Acts:

1. Issuance of qualified certificates for electronic signatures
2. Issuance of qualified certificates for electronic seals
3. Issuance of qualified certificates for website authentication
4. Qualified validation service for qualified electronic signatures
5. Qualified validation service for qualified electronic seals
6. Qualified preservation service for qualified electronic signatures
7. Qualified preservation service for qualified electronic seals
8. Creation of qualified electronic timestamps
9. Provision of qualified electronic registered delivery services
10. Qualified service for the management of remote qualified electronic signature creation devices
11. Qualified service for the management of remote qualified electronic seal creation devices
12. Provision of qualified electronic archiving services
13. Issuance of qualified electronic attestation of attributes
14. Recording of electronic data in a qualified electronic ledger

In light of the extension of the scope of accreditation and the review frequency of ETSI technical standards, it should be noted that it is possible to request accreditation with a flexible scope in accordance with the provisions set out in Regulation RT-37, implementing the EA 2/15 document.

Certification Rules

Pursuant to EU Implementing Regulation No. 2025/2162, certification must be carried out according to a Type 6 Conformity Assessment Scheme (CAS) in accordance with ISO/IEC 17067:2013. In line with Recital 11, the Scheme Owner may coincide with the Certification Body; in any case, the application of the relevant technical

standards for each service category listed above must be confirmed. When preparing the scheme documentation, compliance with Articles 5, 6, and 7 of EU Implementing Regulation No. 2025/2162 must be ensured. It is the responsibility of the Certification Body to prepare appropriate checklists for the systematic and effective collection of objective evidence in relation to the requirements established by the relevant ETSI/EN/ISO standards applicable to the service listed in Annex II of Implementing Regulation No. 2025/2162.

Calculation of Audit Duration	In accordance with the provisions of Article 6, comma 9 of EU Implementing Regulation No. 2025/2162.
Certificate Duration and Audit Frequency	In accordance with the provisions of Article 6, comma 11 of EU Implementing Regulation No. 2025/2162.
Competence Criteria for Personnel Involved in Conformity Assessment	The requirements set out in Article 6, comma 5(f) of EU Implementing Regulation No. 2025/2162 apply. The Body must maintain appropriate records regarding the qualification of personnel responsible for application review, conformity assessment (auditors), and the technical review/decision-making phase. In view of the complexity of the scheme and the entry into force of new EU provisions (e.g., NIS2 Directive), it is considered useful for the Body to establish and implement a process to effectively maintain personnel competence, taking into account specific training, purely technical updates, the results of on-site monitoring activities, and internal audits.
Management of Changes	In accordance with the provisions of Article 6, comma 8 of EU Implementing Regulation No. 2025/2162.

ACCREDIA Database of Issued Certifications

As is well known, Certification Bodies are required to transmit to ACCREDIA-DC, via the web service SIAC, the data relating to entities holding certifications issued by them, in accordance with the procedures defined by ACCREDIA-DC and the relevant Regulations (RG01 §1.10.7). In this regard, the obligations set out in Article 5, comma 1 of EU Implementing Regulation No. 2025/2162 are recalled.

Transitional Provisions

For services already governed by EU Regulation No. 910/2014, the provisions of Article 9 of EU Implementing Regulation No. 2025/2162 apply. By 17 May 2027, all entities accredited under EU Regulation No. 910/2014 and the certificates issued by them must migrate to the updated regulatory framework, under penalty of accreditation withdrawal or reduction of the scope of accreditation, in accordance with the accreditation regulations. The new certification services introduced by eIDAS 2 fall outside the scope of these transitional provisions and may therefore only be provided following a positive evaluation by ACCREDIA.

The adaptation of the certification process will be assessed by ACCREDIA (transition assessment) through an off-site document review with a minimum duration of 1 man-day (the involvement of Technical Experts, where

necessary, will be quoted on a case-by-case basis). For the conduct of the document review, the documents referenced in the annex “Self-Assessment of the Transition Plan” are required and will be evaluated”.

Accreditation Rules

The accreditation requirements are encompassed in the standards ISO/IEC 17065, ETSI EN 319 403-1, ETSI TS 119 403 (Parts 2 and 3), and in EU Implementing Regulation No. 2025/2162, together with the provisions of the relevant accreditation regulations. In the event that the Certification Body already holds accreditations issued by other Accreditation Bodies, an evaluation must be carried out on a case-by-case basis according to the applicable EA/IAF MLA agreements.

Taking into account the provisions of EU Implementing Regulation No. 2025/2162, certification schemes must be designed consistently with Type 6 of ISO/IEC 17067. The evaluation of the proprietary scheme follows the procedure established by Regulation RG-19 and Procedure PG-13-01; however, if the Scheme Owner coincides with the Certification Body, ACCREDIA will carry out the evaluation of the scheme on a documentary basis as outlined below.

A	Certification Body already accredited for the ISO/IEC 17065 scheme	<ul style="list-style-type: none">• Document review of 2 man-days (of which 1 day is dedicated to the evaluation of the Certification Body's proprietary scheme);• Assessment at the Certification Body's premises lasting 1 man-day to examine in detail the requirements of the ETSI standards relevant to the Certification Body's structure and EU Implementing Regulation No. 2025/2162;• At least 1 witness assessment of adequate duration to cover the requested scope of accreditation. For each witness assessment, 1 man-day is allocated for back-office work and reporting.
B	Certification Body not yet accredited for the ISO/IEC 17065 scheme but already accredited for other accreditation schemes (Level 3)	<ul style="list-style-type: none">• Document review of 2 man-days (of which 1 day is dedicated to the evaluation of the proprietary scheme);• Assessment at the Certification Body's premises lasting 3 man-days;• At least 1 witness assessment of adequate duration to cover the requested scope of accreditation. For each witness assessment, 1 man-day is allocated for back-office work and reporting.
C	Certification Body not accredited	<ul style="list-style-type: none">• Document review of 2 man-days (of which 1 man-day is dedicated to the evaluation of the proprietary scheme);• Assessment at the Certification Body's premises lasting 4 man-days;

	<ul style="list-style-type: none">At least 1 witness assessment of adequate duration to cover the requested scope of accreditation. For each witness assessment, 1 man-day is allocated for back-office work and reporting.
Maintenance of Accreditation	<p>It should be noted that ACCREDIA-DC, in any case, must conduct an annual assessment at the premises of the Certification Bodies to evaluate compliance with ISO/IEC 17065.</p> <p>Except in particular situations (e.g., trends in issued certificates, handling of complaints and reports, changes to the certification scheme, changes in the structure of the Certification Body, or other similar situations), and taking into account the complexity of the scheme, ACCREDIA will carry out at least one office assessment each year and at least one witness assessment during the accreditation cycle.</p>

Documentation to be submitted to ACCREDIA-DC for the document review

In addition to what is listed in the accreditation application DA-01, the following must be provided:

- a. Certification scheme prepared in accordance with EU Implementing Regulation No. 2025/2162;
- b. Checklists, guidelines, and instructions prepared by the Certification Body for the Assessment Team;
- c. Qualification criteria and curricula of the personnel responsible for contract review, evaluators, and final reviewers/decision makers, along with their qualification records;
- d. Procedures applicable to the commercial process for defining audit schedules, as well as procedures for managing the certification application process.

Kind regards.

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