



Market Consultation Document

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Market consultation "The procurement of conformity assessment bodies (CABs) for the certification of the Dutch Public NL-wallet"

for the purpose of

The Ministry of the Interior and Kingdom Relations
Directorate for Digital Government

Contactperson	Ellen Diederén
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1. We are seeking conformity assessment bodies (CABs) for the certification of the public NL-wallet

The Ministry of the Interior and Kingdom Relations (BZK), Directorate for Digital Government intends to launch a public tender for the selection of conformity assessment bodies (CABs) for the certification of the public NL-Wallet.

As part of the preparation for this possible tender, we seek to gather input and insights by discussing several relevant topics with the market through a market consultation.

You are hereby invited to respond to this market consultation.

2. Who are we?

The Ministry of the Interior and Kingdom Relations, Directorate for Digital Government, is the Contracting Authority of this market consultation.

2.1 The Contracting Authority

The Directorate for Digital Government (BZK-DO) works towards a high-quality (digital) public service for the Dutch government, citizens, and businesses by providing the digital foundation for the public sector: with reliable authentication and authorization systems, identity documents, government-wide portals, and registrations. In this way, BZK-DO enables the entire government to serve citizens and businesses effectively: accessible, efficient, and agile.

The principles are European frameworks and national strategies and agendas, particularly the Dutch Digitalization Strategy (NDS). The directorate is also responsible for legislation to safeguard the rights of citizens and businesses in the digitalization of government services.

BZK-DO is already the Contracting Authority for some government executing bodies and IT-suppliers. In addition, the directorate implements several large-scale programs such as Stelsel Toegang, Regie op Gegevens and the EDI-stelsel NL (the Dutch EDI-framework).

The EDI-stelsel NL program is responsible for implementing the Dutch framework for the European Digital Identity (EDI-stelsel NL). The eIDAS Regulation requires each Member State to issue at least one certified EU Digital Identity wallet (EUDI-wallet). BZK-DO fulfils this obligation through the development of a public NL Wallet.

For all of this, BZK-DO works closely with ministries, executive agencies, and other governmental bodies. For more information about digital government, please visit: www.digitaleoverheid.nl or www.nldigitalgovernment.nl. If you like to learn more about digital government, the Long-Term Programme for Digital Government Infrastructure (MIDO), and the Generic Digital Infrastructure (GDI), please visit: www.pgdi.nl.

2.2 The Rijksinkoop samenwerking (RIS) is facilitating the market consultation.

Your contact person is Ellen Diederer, Procurement Advisor at the RIS.

3. Where are we looking for?

3.1 Background to the Market Consultation

The eIDAS Regulation requires that all wallets must be certified to be called an EUDI-wallet. This means that the Dutch Public NL-wallet (NL Wallet), and potential other Dutch wallets, must be certified in a timely and reliable manner to be accepted into the EDI-stelsel NL. For the certification of the NL Wallet, the commissioning authority is preparing a possible tender.

The certification will consist of three components (see Chapter 3.6 for further explanation and further breakdown):

- Functional Certification of the Wallet;
- Cyber Security Certification of the Wallet (Solution and Provider);
- National eID-scheme Certification.

The Contracting Authority aims to gather information from the market on the expected timelines, types of costs, activities involved in the certification process and to gain insight into associated opportunities and challenges.

In addition, this market consultation provides an opportunity to inform interested conformity assessment bodies (CABs) in a timely manner, for the possibility of a tender for the certification of the NL Wallet¹. Furthermore, following the launch of the EDI framework, there will likely be a future need for CABs that can certify wallets seeking recognition within the Dutch eID scheme.

3.2 The purpose of the Market Consultation

This market consultation has three objectives:

1. To obtain information about the duration and the expected activities required for the certification process of EUDI-wallets. This information will serve as input for the preparation of the procurement process for the certification of the NL Wallet, the NL Wallet Provider, and the national eID scheme.
2. In addition, the Contracting Authority aims to inform conformity assessment bodies (CABs), through this market consultation, about the ongoing preparations for the certification schemes and the associated requirements, so that they have timely insight into the context and conditions under which the certification will take place.
3. Finally, the Contracting Authority seeks to gain insight into the market by identifying how many parties are interested in contributing, as (accredited) CABs, to the certification of (parts of) EUDI-wallets in the Netherlands.

"The outcomes of this market consultation will help to prepare a potential tender for the certification of the NL Wallet, the NL Wallet Provider, and the national eID scheme. Additionally, the insights gathered may contribute to the broader development of the Dutch EDI framework, including future capacity planning for the certification of EUDI-wallets in the Netherlands. However, the scope of this market consultation and any subsequent tender is limited exclusively to the certification of the NL Wallet, as described in Chapter 3.4."

3.3 What is the context of the assignment at the Ministry of BZK?

The eIDAS Regulation requires each Member State to issue at least one certified EUDI-wallet as defined in the Regulation.² The EUDI-wallet is a secure digital wallet that enables natural persons and legal entities to identify and authenticate themselves throughout the EU at the highest level of assurance. It enables users to securely store, manage, and selectively share personal identity data and electronic attributes, such as a driver's license, diplomas, or other personal information, with both public and private parties. It is essential that users retain full control over their data (privacy by design), that high standards of security and privacy are met, and that the solution can be used across borders within the European Union. The

¹ Whenever reference is made to the certification of the NL Wallet, this always refers to the certification of the total product: the certification of the NL Wallet, the NL Wallet Provider, and the national eID scheme.

² Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, as amended by Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards the establishment of the European Digital Identity Framework.

Netherlands fulfils this obligation through the development of a Dutch Public NL-wallet (NL Wallet).

This wallet will need to be certified through cooperation between multiple CABs (in a so-called composite certification scheme), whereby ultimately one CAB must issue the final certificate of conformity as a top-level Certification Body (CB).

The NL Wallet must be certified in accordance with the national certification schemes, which are currently being developed in line with the eIDAS Regulation and the associated Implementing Acts (including, among others, Article 5c), as well as the CSA/NIS2/CRA and the ISO/IEC 17067.

A first version of the certification schemes is expected to be available around Q2 2026 (see Chapter 3.6). Depending on amended implementing acts and further developments, the certification requirements and schemes may be adjusted while the certification process is already underway.

Certification constitutes a necessary condition for the admission of the NL Wallet to the EDI framework in the Netherlands.

3.4 What is the scope of the assignment for the Contracting Authority?

This market consultation serves as preparation for a possible tender for procuring one or more conformity assessment bodies (CABs) that can contribute to the certification of the NL Wallet, as also described in the previously mentioned and further elaborated sections.

After the certification of all components and services (see Chapter 3.6) has been completed, the top-level CB will prepare a conformity assessment report based on all individual subordinated certifications.

The NL Wallet Provider will then submit the report to the supervisory authority for wallet providers. In the Netherlands, the Rijksinspectie Digitale Infrastructuur (RDI) is the designated authority for this purpose. After the assessment of this report the NL Wallet can be admitted to the EDI-stelsel NL and recognized as a Dutch certified EUDI-wallet.

In the future other wallets may also be certified in the Netherlands and admitted to the EDI-stelsel NL. The requested services in this market consultation relate exclusively to the certification of the NL Wallet and do not include activities for the certification of other wallets.

The scope of the services in the possible request for tenders will likely consist of:

- conducting the conformity assessment of (parts of) the NL Wallet in accordance with the National Certification Schemes;³
- preparing a conformity assessment report and issuing the corresponding certificates.

3.5 What is the scope and purpose of the potential assignment?

The scope of the request consists of the certification of the NL Wallet, with the understanding that the certification consists of three components (see Chapter 3.6):

- Functional Certification of the Wallet;
- Cyber Security Certification of the Wallet (Solution en Provider);
- National eID-scheme Certification.

³ In accordance with the revised Regulation (EU) No 910/2014 (eIDAS) and the associated implementing acts on certification, an EUDI-Wallet is subject to a periodic certification and continuous supervision. A vulnerability assessment is conducted every two years, and a full re-certification takes place every four years.

Through this market consultation, the Contracting Authority will explore which parties are interested in which parts of the certification schemes, and which parties may be willing to act as top-level CB, with the following objectives:

- The certification of the NL Wallet solution, the NL Wallet provider and the National eID-scheme.
- Ensuring that the certification is carried out in accordance with the National Certification Schemes.
- Establishing a transparent and verifiable certification process that demonstrates the reliability and security of the NL Wallet.

3.6 Further explanation of the expected certification scheme

The Netherlands is working together with the certification authorities of several countries, on the development of a harmonized certification scheme in accordance with ISO 17067 (see figure below). Within this scheme, three main pillars can be distinguished: Functional Certification, Cybersecurity Certification, and Compliance with the national eID system. Within this framework, the Netherlands will develop its national certification scheme(s).

Methodological Framework	TR1. Certification system - EUDI Wallets and eID schemes ISO/IEC 17067 Type 6		
	TR2 Vocabulary		
Mngt. System Requirements	TR3. EUDI W functional certification scheme - ISO 17067 - Type 6	TR4. EUDI Wallet Solution Security certification scheme - ISO/IEC 17067 - Type 6	TR5. eID Scheme certification scheme - ISO/IEC 17067 - Type 6
		TR4.1. Organisation Requirements for EUDI W providers according to 5c TR4.2 Organisational Requirements for PID Providers according to 5C	TR5.1 Organisational Requirements for eID providers TR5.2 Organisational Requirements for PID providers TR5.3 Organisational Requirements for eID Scheme supporting services providers
Prod. Requirements	TR3.1 EUDI Functional Requirements Framework based on the requirements of Sa Implementing Acts	TR4.3 EUDI Wallet Solution decomposition and security requirements	TR5.4 Requirements for PID enrollment & PID/Wallet lifecycle management
	TR3.2 EUDI Wallet Functional Requirements Framework - Cross-Device including the Secure QR Code	TR4.3.1 EUDI Wallet decomposition and security requirements for provider supporting services providers	TR5.5 Requirements for EUDI Wallet Enrollment
	TR3.2.1 EUDI Wallet Functional Requirements Framework - Same-Device including the Secure QR Code	TR4.4 EN 17840 Protection Profile Wallet Unit	TR5.6 Requirements for eID Means management (including authentication)
	TR3.2.1 bis EUDI Wallet decomposition and functionality requirements	TR4.5 EN 17840 Generic Security Target Wallet Unit - AVAN VAN 5	TR5.7 eID providers Cybersecurity Audit Framework
	TR3.3 EUDI Wallet Functional Conformity Certification Audit Framework for Sa Implementing Acts	TR4.6 EU CC Protection Profile for WSCA	TR5.8 PID enrollment & lifecycle management Cybersecurity Audit Framework
	TR3.4 EUDI Wallet Test Plan - Proximity Usage including PID Profiles	TR4.7 EU CC Protection Profile for WSCD	TR5.9 eID Scheme supporting services providers Cybersecurity Audit Framework
	TR3.5 EUDI Wallet Test Plan - Online Usage including PID Profiles	TR4.8 EUDI Wallet provider Cybersecurity Audit framework	TR5.10 PID enrollment & PID/Wallet lifecycle management Cybersecurity Audit Framework
	TR3.6 EUDI Wallet ICS	TR4.9 PID Provider Cybersecurity Audit framework (Requirements from IA5c only)	TR5.11 EUDI Wallet Enrollment Cybersecurity Audit Framework
		TR4.10 Risk registry Cybersecurity audit framework	TR5.12 eID Means Management Cybersecurity Audit Framework
Supporting documents	TR6. Risk register governance		
	TR7. Requirements on CABs		
	TR8. National EUDI W and eID Scheme certification scheme template		

In this context, it should be noted that the Dutch Certification Schemes will be developed as follows:

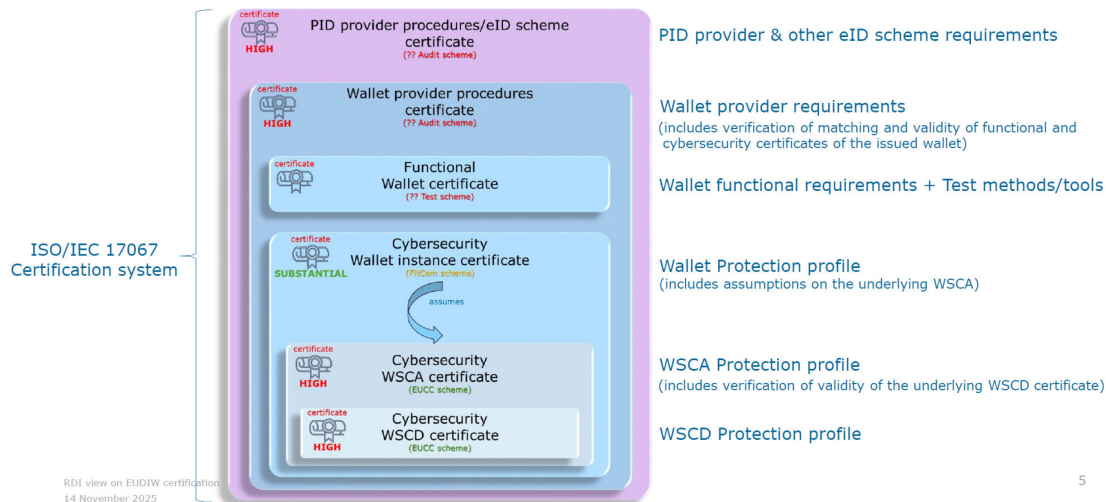
1. Functional Certification of the Wallet
 - a. Interoperability / compliance tests under development.
2. Cyber Security Certification of the Wallet (Solution and Provider)
 - a. Potential certification of the WSCD (possibly reusing an existing Protection Profile).
 - b. Certification of the WSCA (Protection Profile under development).
 - c. Certification of the Wallet application (taking into account the 'assumptions on the underlying system' and the applied WSCA/WSCD).
 - d. Certification of the Wallet Provider (Organization/Policy Requirements and Cyber Resilience Requirements).
 - e. Compliance with Wallet Onboarding & Lifecycle Management Requirements.

3. National eID Scheme Certification

- a. Certification of compliance of the the Wallet (Provider) with the PID-issuance requirements.
- b. Conformity Assessment of the PID Provider (eIDAS, ETSI TS 119 401, PID Issuance & Lifecycle management, standards related to Identity Proofing, CIR2015/1502, NIS2).



Certificate composition (PID provider centric)



In addition to the certificate composition, the following applies:

- The WSCA/WSCD must be certified conform Common Criteria AVA_VAN.5.
- The Wallet Application must be certified conform FITCEM level AVA_VAN.3.
- For the Wallet Application certification, the CAB must be familiar with OWASP MAS and with security techniques available on Android and iOS platforms.
- For the Wallet Provider certification the CAB must be familiar with NIS2 and the CRA.
- For the National eID conformity assessment the CAB must be familiar with applicable identity proofing standards and current practices for QTSPs.
- In this context, explicit reference is made to the (essential) standards as established and published in the European Commission's online publications on "Standards and Technical Specifications" for the EUDI-Wallet.

3.7 Expectations regarding accreditation

The CAB(s) responsible for carrying out the certification must, for the component(s) to be certified, be accredited by the national accreditation body on the basis of the applicable certification requirements and schemes. It is being examined whether the accreditation of the CAB(s) can be carried out in parallel with the certification process of the NL Wallet.

3.8 Publicly Available Sources for Reference

To support you in preparing your responses to this consultation, the Contracting Authority provides access to the following publicly available sources:

- <https://minbzk.github.io/nl-wallet/main/index.html> (project documentation)
- <https://github.com/MinBZK/nl-wallet> (source code)

4. What is the most suitable structure for the potential assignment?

The overall certification is an important requirement of the potential assignment. In order to successfully carry out the assignment, each component must be certified, after which a conformity assessment report containing the total certification will follow. This requirement presents specific challenges for the structure of the assignment, potential cooperation between parties, and the allocation of responsibilities.

Background and assumptions

At this moment, BZK-DO cautiously assumes that no single party is capable of carrying out the assignment in its entirety; however, we would welcome your views on whether this assumption is correct. Should there be a party that is able to perform the assignment in an integrated manner (including overall certification), BZK-DO would appreciate being informed accordingly.

In order to determine the procurement process and approach, two options are being considered:

1. Dividing the assignment into lots:
 - A number of sub-assignments, each with its own certification requirements.
 - One contractor in the lead responsible for:
 - Coordination and integration of the sub-assignments.
 - Overall certification of all components and services and the conformity assessment report based on all individual sub-ordinated certifications.
 - Coordination with certification body(ies) and quality assurance.
2. One single, integrated assignment:
 - A single main contractor responsible for both execution and overall certification of all components and services and preparing a conformity assessment report.
 - Subcontractors may be engaged for specific components; however, the main contractor remains ultimately responsible for the certification.

5. What questions do we have?

Below you will find our questions. Answering these will require some time on your part, which we greatly appreciate. When responding, please use Annex 1 (Market Consultation Q&A Response Form).

General questions	
1.	Are you able to carry out the assignment in its entirety, including overall certification? • If yes: How would you organize this (for example, through subcontractors or a consortium)? • If no: ○ What are the limitations (for example, scale, expertise, or costs)? ○ And in which component(s) of the described <i>composite certification scheme</i> do you have an interest?
2.	What experience does your organization have with certification trajectories comparable to this assignment? • What were the main challenges, and why (for example, coordination, documentation, audits)?
3.	Which option (1 or 2) in chapter 4 do you prefer, and why?
4.	Do you see alternative options that might be more suitable?
5.	What is your expectation regarding cost categories and types of activities involved in carrying out the assignment? • Can you provide an overall estimate for the component(s) in which you are interested?

6.	What is your expectation regarding the time required for the component in which you are interested, including preparation, execution, and delivery of the conformity assessment report? Time refers both to the overall execution time and to the amount of time spent by your team members on this activity. Can you provide an estimate?
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Questions regarding option 1: Dividing the assignment into lots

7.	Is the role of lead contractor (responsible for overall certification) feasible for your organization? If not: What obstacles do you foresee (e.g. complexity, liability)?
8.	How can the coordination between the sub-assignments be ensured in order to safeguard overall certification? Which interfaces or arrangements are required for this purpose (for example, joint audits, standardized documentation)?
9.	How would you propose structuring the potential division into lots? How would you structure the lots, and why?
10.	Do you see risks in combining partial certificates into a single overall certification? How can these risks be mitigated (for example, contractual arrangements, interim audits)?
11.	What advantages do you see in dividing the assignment into lots?
12.	What disadvantages or risks do you see in dividing the assignment into lots?

Questions regarding option 2: The assignment as a single, integrated whole

13.	Would your organization be able to carry out the assignment in its entirety, including overall certification? - If yes: Under what conditions (e.g. planning, budget, support from subcontractors)? - If no: What would be required to make this possible?
14.	How would you organize the overall certification if you were to carry out the assignment in an integrated manner? Would you outsource components to subcontractors? If so, how would you safeguard the integrated certification?
15.	What advantages do you see in an integrated approach to certification?
16.	What disadvantages or risks do you see in an integrated assignment?

6. How are we conducting this market consultation?

We are publishing this market consultation publicly to allow all interested parties to participate. The consultation will be announced via [TenderNed](#) and [TED](#). Responses must be submitted through TenderNed. Instructions on how to use TenderNed as a business can be found in [here \(Dutch\)](#) or [here \(English\)](#). For technical issues, you can also [contact](#) TenderNed support directly.

7. What is the procedure and the planning?

This market consultation will commence upon publication on Tender. Below you will find the timeline for the remainder of the procedure

Activity	Date and time
Publication of Market Consultation	Tuesday, March 10, 2026
Submission of your questions	Tuesday, March 24, 2026
Publication of our clarifications	Wednesday, April 8, 2026
Submission of your written responses	Wednesday, April 22, 2026
Notification of individual meetings	Week of April 28th (week 18)
Conducting individual meetings	Weeks of May 11th and 18th (weeks 20 and 21)
Final report available to interested parties	Week of June 8th (week 24)

7.1 Do you have questions about the assignment or market consultation?

Submit these via the messaging module in TenderNed before the specified date and time. All questions and our answers will be openly published afterward in a clarification note in TenderNed. Make sure your questions do not contain any information that you do not wish to be published openly.

7.2 Submitting written responses

Please use Annex A (Market Consultation Q&A Response Form) when answering the questions.

7.3 What happens after the market consultation?

The insights gathered will inform the preparation of our assignment and procurement process. We aim for transparency and equal opportunities for all participants. Therefore, we will compile a final report summarizing the market consultation (excluding confidential information). This report will be shared with interested market parties and included in the tender documents if we proceed with a formal procurement.

8. Basic Principles and Conditions

Participation in the market consultation is non-binding. By taking part, you acquire no rights, nor does it impose any obligations. No costs associated with this market consultation will be reimbursed.

The intended assignment will be governed by the Dutch Government General Terms and Conditions (ARVODI-2025). Conditions proposed by market parties do not apply.

The basic principles and conditions of participation in the market consultation can be found in chapter 10.

9. Overview of annexes

This market consultation includes the following annexes:

Background information	
Annex A	Format Clarification Note

To be completed by market parties and uploaded via TenderNed	
Annex B	Answers to Market Consultation Questions

10. Starting points and limiting conditions for this Market Consultation

This chapter describes the starting points and limiting conditions applicable to this Market Consultation. By participating in this Market Consultation, you agree unconditionally with reservations, starting points and limiting conditions as stated in this Market Consultation Document. The starting points and limiting conditions have been listed below:

- In this Market Consultation procedure, the Contracting Authority will observe the principles of non-discrimination and transparency, as meant in the Public Procurement Act 2012;

- This Market Consultation Document is solely intended for Market Consultation purposes;
- This Market Consultation will explicitly not be used to make a pre-selection of candidates or interested Relevant Market Parties in the context of an intended tender;
- Relevant Market Parties who do not participate in the Market Consultation will not be excluded from further participation in a potential procurement procedure. Relevant Market Parties who do participate in the Market Consultation do not exclude themselves in any manner whatsoever, nor do they advantage themselves in any way for any participation in a procurement procedure;
- The Market Consultation is free of obligation both for any Relevant Market Parties and for the Contracting Authority;
- Participating Relevant Market Parties can derive no rights or obligations from this Market Consultation against the Contracting Authority;
- Participation by a Relevant Market Party to this Market Consultation does not give any right to acquiring an assignment;
- The participating Relevant Market Parties agree that the Contracting Authority may incorporate the information provided by the Relevant Market Parties anonymised in the schedule of requirements still to be determined by the Contracting Authority;
- Information provided in the context of the Market Consultation might deviate from the information still to be issued in the tender;
- To the extent possible, the Contracting Authority will deal with input from the Participating Relevant Market Parties confidentially, in which, in any event, the Contracting Authority will keep account of the legitimate business interests of parties;
- The language to be used in this Market Consultation is English on TenderNed;
- The Contracting Authority is not bound in any way whatsoever by the results of the Market Consultation, nor is it obliged to realisation and/or tendering of the project to which this Market Consultation relates;
- Under no circumstances will the Contracting Authority honour any claims for the use of information, confidentiality, or requests for remuneration;
- The documents submitted by participating parties will be considered to be public documents and exempt of copyright. If copyrights are applicable, then that Participating Company or those Participating Companies indemnify the Contracting Authority;
- The Contracting Authority places no value judgment on the answers given by you to the questions; and
- The Contracting Authority reserves the right to:
 - amend the planning as stated in this document;
 - implement the intended tendering procedure in terms of format and content in a manner other than the procedure that has possibly been notified; and
 - discontinue this Market Consultation tentatively or definitely.