EUDIW CERTIFICATION SYSTEM MANAGEMENT BOARD NL

Ensuring High Assurance of EUDI Wallets
& the NL National eID Scheme

NL-TL

NL EUDI Wallet Certification System

Top Level Certification Scheme

RC1.1

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1 Foreword

1 This document (NL-TL) presents the specification for the Wallet Provider Top-Level Certification Scheme. It defines the Certification Scheme — in the sense of ISO/IEC 17067 — that accredited Certification Bodies (CABs) shall apply when assessing the conformity of European Digital Identity Wallet (Provider)s in conjunction with the electronic identification scheme under which they are provided.

2 This document should be read in conjunction with the NL Certification System overarching documents, notably NL-SYS-01 which clarifies that A top-level certificate under the NL National eID Scheme will be subject to the applicant wallet provider to satisfy the applicable requirements of the certification scheme; to provide the required underlying certificates; and to demonstrate that it meets the national admission-conditions as set in National law.

3 NL-TL is primarily addressed to CABs conducting certification activities under the NL Certification System. Wallet Providers subject to certification should read this document in conjunction with the applicable NL-P-* subsidiary documents, which specify the substantive requirements they shall meet.

4 This document should especially be read in conjunction with NL-SYS-01 (NL EUDI Wallet Certification System) and NL-SYS-03 (Organization and support for the owner of the national EUDI certification system).

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2 Scope

5 The document specifies the Certification Scheme to be applied by the National eID scheme owners to apply onto Wallet Providers that that seek to acquire a Top-Level Certificate and that seek to be admitted to the National eID scheme ("stelsel").

6 In the context of this certification scheme, the object of certification is the conformity of European Digital Identity Wallet (Provider)s in conjunction with the electronic identification scheme under which they are provided.

7 The object of certification under NL-TL encompasses

- the wallet provider to have satisfied the applicable requirements of the certification scheme; to have the required underlying certificates; and to have demonstrated that it meets the national admission-conditions as set in National law, and
- the government-assigned PID provider that the Wallet Provider is linked to, to also have satisfied the applicable requirements of the certification scheme and to have the required certificates.

8 NL-TL establishes the assessment procedures that accredited CABs shall apply when evaluating in conjunction with the government-assigned PID provider that the Wallet Provider is linked, as-well-as the certificates and other declarations of conformity the wallet provider and PID provider need to provide.

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3 Legal Basis

9 The Certification Scheme defined in this document is established pursuant to the following legal instruments:

1 Regulation (EU) 2014/910 modified by 2024/1183 Functional framework (Article 5a) and respective Commission Implementing Regulations:

- EU 2024/2977
- EU 2024/2979
- EU 2024/2982

2 Certification Rules (Article 5c of with Regulation (EU) 2014/910 modified by 2024/1183) and the Implementing Regulation (EU) 2024/2981

3 European Cybersecurity Certification scheme as specified in EUCC as defined in the Commission Implementing Regulation (EU) 2024/482

4 Article 54 of the EU 2019/881 Cybersecurity Act

5 Article 8(3) of EU 910/2014 on eID and trust services for electronic transactions along with Commission Implementing Regulation (EU) 2015/1502

6 Regulation (EU) 765/2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products(..), in particular Articles 4 and 5.

10 In addition, the NL-TL Certification Scheme will comply with:

1 [Placeholder for references to NL national law when available]

2 Notably the provisioning wrt admission criteria

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4 References

4.1 Standards and technical specifications

11 ISO/IEC 17065, Conformity assessment — Requirements for bodies certifying products, processes and services

12 ISO/IEC 17067, Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes

4.2 Parent documents

13	NL-SYS-01.	NL EUDI Wallet certification system
14	NL-SYS-02.	Vocabulary
15	NL-SYS-03.	Organization and support for the owner of the national EUDI certification system
16	NL-SYS-04.	Developing and maintaining the risk register for EUDI Wallet implementation and certification
17	NL-SYS-05.	Accreditation requirements for CABs

4.3 Subsidiary Documents

18	NL-P-P	NL PID Provider Certification Scheme
19	NL-P-W	NL Wallet Provider Certification Scheme

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5 Terms and Definitions

20 For the purposes of this document, all terms and definitions are provided in NL-SYS-02. Vocabulary.

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6 Certification Scheme Structure

6.1 Object of Certification

21 The object of certification under this scheme is the conformity of European Digital Identity Wallet (Provider)s in conjunction with the electronic identification scheme under which they are provided

22 The CAB shall assess the conformity of the object of certification against the set of requirements determined by the prescribed composition rules in the NL EUDI Certification SYSTEM (cfr NL-SYS-01) and additional national admission criteria..

23 NOTE: In the context of NL-TL certification scheme only a certification body that is accredited and also authorized under Dutch law is eligible as CAB.

6.2 Roles and Responsibilities

6.2.1 Overview of the scheme stakeholders

24 The overview of the roles and responsibilities is presented in Table 1.

Table 1 Overview of Roles and Responsibilities

Role	Responsibilities	Normative basis
Scheme Owner	Owns and supervises the scheme; authorises CABs; maintains certificate register; monitors the scheme.	ISO/IEC 17067
CAB	Plans, performs and documents the evaluation; issues the certification decision and certificate of conformity; manages surveillance and recertification activities.	ISO/IEC 17065; NL-SYS-05
Applicant / Certificate Holder	Submits the eID scheme for certification; provides evaluation evidence; complies with post-certification obligations including surveillance cooperation and change notification.	NL-TL
National Accreditation Body (NAB)	Accredits CABs in accordance with ISO/IEC 17065 for the relevant scope under this scheme.	Regulation (EC) No 765/2008
Market Surveillance Authorities	Oversight of certified services in the market. This role will be performed by the NL-TL Scheme Owner.	ISO/IEC 17067 & National Law

6.2.2 Accreditation of CABs

25 CABs operating under this scheme shall be accredited by the National Accreditation Body in accordance with ISO/IEC 17065. The required general competences and other accreditation requirements are specified in NL-SYS-05. The required specific competences should encompass the full range covered by NL-P-P and NL-P-W.

26 General provisions on CAB accreditation, including requirements for accreditation scope and recognition of accreditation granted by other national accreditation bodies within the EU, are set out in NL-SYS-01 and NL-SYS-05.

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6.3 Mechanisms to ensure impartiality

27 The CAB is obliged to implement mechanisms to ensure impartiality in accordance with ISO/IEC 17065. General provisions on impartiality requirements are set out in NL-SYS-05.

6.4 Relationship to subsidiary NL-P-W and NL-P-W.

28 NL-TL is the top-level Certification Scheme within the NL-SYS-01 EUDI Wallet Certification System. The CAB executing the assessment of the Wallet Provider in this context, shall verify that:

- the wallet provider has satisfied the applicable requirements of the NL-P-W certification scheme and has the required NL-PW certificates (that encompasses services that consists of provision and operation of wallet solutions), as-well as the fact that the wallet provider has conformity statements that demonstrate that it meets the national admission-conditions as set in National law.

- the government-assigned PID provider, that the Wallet Provider is linked to, also has satisfied the applicable requirements of the certification scheme and also the required certificates (that encompasses all services that support the provision and operation of services that support the controlled issuance and lifecycle management related to PIDs and transversal services that support the trust in the overall eID national scheme (like user dashboard and notification in order to combat fraud)).

6.5 Scheme Type

29 The NL-TL Certification Scheme is a composite certification scheme established in accordance with the principles of EN ISO/IEC 17067. It relies on conformity assessment results and certificates issued under subordinate certification schemes within the NL EUDI Wallet Certification System. These subordinate schemes include Type 5 and Type 6 certification schemes as defined in EN ISO/IEC 17067.

30 The top-level certification process does not require repetition of conformity assessment activities already adequately covered by valid subordinate certificates. The CAB shall assess the validity, scope, applicability and continuing status of such certificates and shall evaluate any requirements, dependencies and interfaces not sufficiently covered by the subordinate certification results.

31 The CAB remains responsible for the top-level certification decision irrespective of the extent to which it relies upon conformity assessment results obtained under subordinate certification schemes.

6.6 Use of certification and marks of conformity

32 Only the NL EUDI Wallet Mark as defined in NL-SYS-03 shall be used as a mark of conformity for certifications issued under this scheme. No additional marks of conformity shall be defined within the NL-TL Certification Scheme.

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33 The common requirements for the use of certification and marks of conformity are set out in NL-SYS-01 and NL-SYS-03.

34 The CAB shall be responsible for granting, suspending and withdrawing the right to use the mark of conformity in accordance with the certification decisions it takes under this scheme. Where a certificate is suspended or withdrawn, the EUDI Wallet Provider shall cease using the mark of conformity without undue delay.

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7 Evaluation Framework

7.1 General

35 This section specifies the general evaluation methodology for the NL-TL composite certification scheme. The CAB shall base its evaluation on valid certificates and conformity assessment results issued under the applicable subordinate certification schemes for the Wallet Provider, the Wallet Solution and the government-assigned PID Provider to which the Wallet Provider is linked.

36 The CAB shall verify the validity, scope, applicability and continuing status of these certificates and results. It shall additionally evaluate any requirements, national admission conditions, dependencies and interfaces that are not sufficiently covered by the subordinate certification results.

37 Evaluation activities already adequately covered by valid subordinate certificates shall not be repeated unnecessarily. Where the available evidence is insufficient, the CAB shall perform, or require, supplementary evaluation activities necessary to obtain sufficient and appropriate evidence for the top-level certification decision.

38 The evaluation shall follow the applicable process requirements set out in NL-SYS-05, Section 7, and shall be planned, performed and documented in accordance with the CAB's established procedures. It shall take into account the minimum requirements for evaluating electronic identification schemes set out in Annex VI to Commission Implementing Regulation (EU) 2024/2981, including the evaluation of the applicable risk register.

39 The CAB remains fully responsible for its evaluation conclusions and the top-level certification decision, irrespective of its reliance on subordinate certificates or other conformity assessment results.

7.2 Scope of Evaluation

40 The scope of the evaluation shall encompass the conformity of the object of top-level certification as defined in Section 6.1, taking into account the applicable subordinate certification results and the relationship between the Wallet Provider, the Wallet Solution, the government-assigned PID Provider and the national electronic identification scheme.

41 As a minimum, the evaluation shall cover:

- the presence, validity, scope and applicability of the certificates and conformity assessment results required under the applicable subordinate certification schemes;
- confirmation that the subordinate certificates collectively cover the entities, services, components and versions included in the object of top-level certification;

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- confirmation that the Wallet Provider and the government-assigned PID Provider to which the Wallet Provider is linked hold the certificates and other conformity assessment results required under the NL EUDI Wallet Certification System;
- the fulfilment of applicable national admission conditions that form part of the object of top-level certification;
- dependencies and interfaces between the Wallet Provider, the Wallet Solution, the government-assigned PID Provider and the national electronic identification scheme, to the extent that these are relevant to conformity at top level;
- any requirements applicable at top level that are not sufficiently covered by the subordinate certification results;
- any limitations, conditions, exclusions or other circumstances associated with subordinate certificates that may affect their applicability to the object of top-level certification; and
- any residual risks or gaps identified when the subordinate certification results are considered collectively.

42 The scope of evaluation shall include any supplementary evaluation activities necessary where the subordinate certification results or other accepted assurance evidence do not provide sufficient and appropriate evidence for one or more aspects of the top-level certification.

43 Evaluation activities already adequately covered by valid subordinate certification results shall not be unnecessarily repeated. The scope of the top-level evaluation shall therefore be determined by the coverage provided by the subordinate certification results together with those additional requirements, dependencies, interfaces, admission conditions and residual matters that require evaluation at top level.

44 The CAB shall document the scope of the evaluation, the subordinate certification results on which it relies, the aspects covered by those results and any aspects requiring supplementary evaluation..

7.3 Evaluation Methods

45 The CAB shall apply evaluation methods appropriate to the composite nature of the NL-TL Certification Scheme and to the evidence required to support the top-level certification decision.

46 The evaluation shall primarily consist of the examination and verification of certificates and conformity assessment results issued under the applicable subordinate certification schemes. The CAB shall determine whether such certificates and results:

- are valid and remain in force;
- cover the entities, services, components and versions relevant to the object of top-level certification;
- have a scope that corresponds to the requirements for which reliance is intended;
- are applicable to the Wallet Provider, the Wallet Solution and the government-assigned PID Provider included in the object of certification; and
- provide sufficient and appropriate evidence for the top-level certification decision.

47 The CAB shall additionally evaluate the conformity aspects that are not sufficiently covered by the subordinate certification results. Such evaluation shall include, as applicable:

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- verification of fulfilment of the applicable national admission conditions;
- evaluation of dependencies and interfaces between the Wallet Provider, the Wallet Solution, the government-assigned PID Provider and the national electronic identification scheme;
- assessment of whether the subordinate certificates and other conformity assessment results, when considered collectively, provide sufficient coverage of the object of top-level certification;
- examination of changes, limitations, conditions, suspensions or other circumstances affecting the applicability or continuing validity of the subordinate certification results; and
- evaluation of any residual requirements or risks that are not sufficiently addressed by the subordinate certification results.

48 Where supplementary evaluation is necessary, the CAB may use appropriate evaluation methods, including document review, interviews, observation, technical verification and examination of other objective evidence. Such supplementary evaluation shall be limited to those aspects for which the available subordinate certification results and other accepted assurance evidence do not provide sufficient and appropriate evidence.

49 The CAB shall document the evaluation methods applied, the subordinate certification results relied upon, the extent of such reliance, any identified gaps and the supplementary evaluation activities performed to address those gaps.

50 Evaluation activities already adequately covered by valid subordinate certification results shall not be unnecessarily repeated. The use of subordinate certification results does not transfer responsibility for the evaluation conclusion or the top-level certification decision to the bodies that issued those results.

7.4 Types of evidence

51 The CAB shall obtain sufficient and appropriate evidence to support its evaluation conclusions and the top-level certification decision. In accordance with the composite nature of the NL-TL Certification Scheme, evidence shall primarily consist of certificates and associated conformity assessment results issued under the applicable subordinate certification schemes.

52 Evidence may include, as applicable:

- valid certificates of conformity issued under the applicable subordinate certification schemes for the Wallet Provider, the Wallet Solution and the government-assigned PID Provider;
- certification information necessary to establish the scope, object, applicability, validity and continuing status of such certificates, including the entities, services, components and versions covered;
- associated conformity assessment results, evaluation reports, declarations of conformity or other certification records, to the extent necessary to determine the coverage and applicability of the subordinate certification results;
- evidence demonstrating fulfilment of applicable national admission conditions;
- evidence concerning dependencies and interfaces between the Wallet Provider, the Wallet Solution, the government-assigned PID Provider and the national electronic

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identification scheme, where these are not sufficiently addressed by the subordinate certification results;
- information concerning conditions, limitations, exclusions, changes, suspensions, withdrawals or other circumstances that may affect the validity or applicability of subordinate certification results;
- evidence concerning residual requirements or risks identified when the subordinate certification results are considered collectively;
- external assurance evidence accepted in accordance with Sections 7.6 and 7.7; and
- evidence obtained through supplementary evaluation activities performed in accordance with Section 7.3 where the subordinate certification results and other accepted assurance evidence do not provide sufficient and appropriate evidence.

53 Where supplementary evaluation is required, evidence may include relevant documentation, records, technical information, interview results, observations, test or verification results and other objective evidence necessary to address the identified gap.

54 The CAB shall assess evidence in relation to the aspect of conformity for which it is relied upon and shall ensure traceability between the object and scope of top-level certification, the applicable requirements, the subordinate certification results and any supplementary evidence used.

55 Evidence supporting conformity already adequately established by valid and applicable subordinate certification results shall not be unnecessarily reproduced or reassessed. The CAB may, however, obtain information necessary to establish the validity, scope, applicability and continuing status of those results.

56 The CAB shall document the evidence relied upon, including its source, scope and relationship to the top-level evaluation, and shall retain the applicable evaluation records in accordance with the record-keeping requirements of NL-SYS-01..

7.5 Proportionality

57 The depth and extent of the top-level evaluation shall be proportionate to the assurance already provided by the applicable subordinate certification results and to the risks, dependencies and interfaces relevant to the object of top-level certification.

58 When determining the extent of the evaluation, the CAB shall take into account, as applicable:
- the scope, validity, applicability and continuing status of the subordinate certificates and associated conformity assessment results;
- the extent to which the subordinate certification results collectively cover the object of top-level certification;
- the degree to which requirements applicable at top level are already addressed by valid and applicable subordinate certification results;
- the nature and significance of dependencies and interfaces between the Wallet Provider, the Wallet Solution, the government-assigned PID Provider and the national electronic identification scheme;
- conditions, limitations, exclusions or other restrictions associated with the subordinate certification results;
- changes affecting the Wallet Provider, Wallet Solution, PID Provider or relevant interfaces since issuance of the subordinate certificates;

- residual risks or gaps identified when the subordinate certification results are considered collectively; and
- relevant risks identified in the applicable risk register.

59 Where valid and applicable subordinate certification results provide sufficient and appropriate evidence for an aspect of the object of top-level certification, the CAB shall avoid unnecessary repetition of the underlying conformity assessment activities.

60 Where the subordinate certification results provide only partial coverage, or where identified dependencies, interfaces, changes, limitations or residual risks create uncertainty regarding conformity at top level, the CAB shall increase the depth or extent of the evaluation as necessary and shall perform, or require, supplementary evaluation in accordance with Sections 7.2 to 7.4.

61 The application of proportionality shall not waive, reduce or replace mandatory conditions for top-level certification. In particular, proportionality shall not compensate for the absence, expiry, suspension, withdrawal or insufficient scope of a subordinate certificate required under the NL EUDI Wallet Certification System, nor shall it replace demonstration of fulfilment of applicable national admission conditions.

62 The CAB shall document the considerations applied in determining the depth and extent of the top-level evaluation and any supplementary evaluation activities.

7.6 Reliance on certificates and other assurance evidence.

63 The NL-TL Certification Scheme relies on conformity assessment results and certificates issued under the applicable subordinate certification schemes within the NL EUDI Wallet Certification System. Such subordinate certification results constitute primary evidence for the top-level evaluation, subject to verification by the CAB in accordance with Sections 7.2 to 7.5.

64 For each subordinate certification result on which reliance is placed, the CAB shall establish that:

- *the certificate or conformity assessment result is authentic, valid and remains in force;*
- *the issuing CAB was competent and appropriately accredited and, where applicable, authorised for the certification concerned;*
- *the object and scope of certification correspond to the entity, service, component and version included in the object of top-level certification;*
- *any conditions, limitations, exclusions, suspensions or other qualifications associated with the certification result have been identified and taken into account;*
- *the certification result provides appropriate coverage of the requirements for which reliance is intended; and*
- *no known change or other circumstance materially affects its applicability to the top-level certification.*

65 Where these conditions are satisfied, the CAB shall rely on the subordinate certification result for the conformity aspects adequately covered by that result and shall not unnecessarily repeat the underlying conformity assessment activities.

- *Reliance on a subordinate certification result shall not extend beyond its demonstrated scope or applicability. Where a subordinate certification result provides only partial coverage, or where a gap, dependency, interface, change or*

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residual risk affects its applicability at top level, the CAB shall perform, or require, supplementary evaluation in accordance with Sections 7.2 to 7.5.

- *In addition to the required subordinate certification results, other assurance evidence may be accepted where it is relevant to conformity aspects that require evaluation under this scheme. Such evidence may include certificates, evaluation reports, audit reports, test reports, declarations of conformity or other assurance results produced outside the applicable subordinate certification schemes.*
- *The acceptability and extent of reliance on such other assurance evidence shall be determined by the CAB in accordance with the evaluation criteria specified in Section 7.7 and the applicable general rules established in NL-SYS-01.*
- *Acceptance of other assurance evidence shall not replace a subordinate certificate that is required as a condition for top-level certification.*

66 The CAB shall document:

- *the subordinate certification results and other assurance evidence relied upon;*
- *the conformity aspects for which reliance was accepted;*
- *the extent of reliance;*
- *any limitations or gaps identified; and*
- *any supplementary evaluation performed or required as a consequence.*

67 Irrespective of the extent of reliance on subordinate certification results or other assurance evidence, the CAB remains responsible for determining whether sufficient and appropriate evidence exists to support the top-level evaluation conclusions and certification decision..

7.7 Evaluation criteria

68 The CAB shall evaluate whether the certification results and other assurance evidence relied upon provide sufficient and appropriate evidence for the conformity aspects for which reliance is intended.

69 For subordinate certification results required under the NL EUDI Wallet Certification System, the evaluation shall establish, as applicable:

- the authenticity and current validity of the certificate or conformity assessment result;
- the competence, accreditation and, where applicable, authorisation of the CAB that issued the certification result;
- correspondence between the certified object and the entity, service, component and version included in the object of top-level certification;
- adequacy of the scope of certification in relation to the conformity aspects for which reliance is intended;
- the applicability and continuing status of the certification result;
- any conditions, limitations, exclusions, suspensions or other qualifications affecting the certification result;
- any relevant changes that may affect the continued applicability of the certification result; and
- whether the subordinate certification results, when considered collectively, provide sufficient coverage of the relevant aspects of the object of top-level certification.

70 Where a required subordinate certification result satisfies the applicable criteria above, the CAB shall accept that result as evidence for the conformity aspects adequately

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covered by it and shall not unnecessarily repeat the underlying conformity assessment activities.

71 For other assurance evidence considered in addition to the required subordinate certification results, the CAB shall determine its acceptability and the extent of reliance having regard, as applicable, to:

- **Issuer competence and impartiality**: the competence, independence and, where relevant, accreditation of the body that produced the evidence;
- **Scope adequacy**: the extent to which the evidence covers the entity, service, component, process, system, requirement or period for which reliance is intended;
- **Timeliness and continuing relevance**: whether the evidence is sufficiently current and whether subsequent changes or events may affect its applicability;
- **Rigour and depth of evaluation**: whether the evaluation methodology and depth of examination provide an appropriate level of assurance for the conformity aspect concerned;
- **Findings and qualifications**: any findings, exceptions, qualifications, limitations or unresolved nonconformities that may affect reliance on the evidence; and
- **Traceability**: whether a sufficiently clear relationship can be established between the evidence and the conformity aspect for which it is intended to be used.

72 Where other assurance evidence only partially satisfies these criteria, the CAB may accept it to the extent justified by its demonstrated coverage and shall perform, or require, supplementary evaluation for those aspects not sufficiently covered.

73 Other assurance evidence shall not be accepted as a substitute for a subordinate certificate that is mandatory under the NL EUDI Wallet Certification System.

74 The CAB shall consider the subordinate certification results and any accepted other assurance evidence collectively to determine whether they provide sufficient and appropriate evidence for the object of top-level certification. In doing so, the CAB shall identify any gaps, overlaps, dependencies, interfaces, inconsistencies or residual risks that may affect the top-level conformity conclusion.

75 Where the available evidence, considered collectively, is insufficient to support a conformity conclusion, the CAB shall perform, or require, supplementary evaluation in accordance with Sections 7.2 to 7.5.

76 The CAB shall document its evaluation of the evidence, the extent of reliance accepted, any limitations or gaps identified, and any supplementary evaluation required. Irrespective of the evidence relied upon, the CAB remains responsible for the evaluation conclusions and the top-level certification decision..

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8 Certification Process

8.1 General

The top-level certification process is a composite conformity assessment process. It determines whether the Wallet Provider, the Wallet Solution version(s) in scope, and the government-assigned PID Provider to which the Wallet Provider is linked collectively satisfy the conditions for certification under the NL EUDI Wallet Certification System.

The CAB shall apply the process requirements of ISO/IEC 17065, NL-SYS-01 and NL-SYS-05. The CAB shall use valid subordinate certificates as primary evidence, shall verify national admission conditions, and shall evaluate dependencies, interfaces and residual matters not sufficiently covered by subordinate certification results.

Reliance on subordinate results does not transfer responsibility for the top-level evaluation conclusion or certification decision.

The process comprises application review, evaluation, review, certification decision, issuance, surveillance, change handling, suspension or withdrawal where applicable, and recertification.

The same CAB may perform the top-level certification and one or more subordinate certifications, provided impartiality, separation of review and decision, and the applicable competence requirements are maintained. Notably it would be advisable that the accredited/authorized/assigned CAB for NL-TL is the same as for NL-P certification.

8.2 Preparation and application phase

The applicant shall submit an application identifying the precise object and scope of top-level certification. The application shall include at least:

- legal identity and contact details of the Wallet Provider;
- identification of the Wallet Solution and each version, configuration and deployment model proposed for inclusion;
- identification of the government-assigned PID Provider and the relationship through which PID issuance is provided to the Wallet Solution;
- a complete inventory of mandatory subordinate certificates and declarations of conformity, including certificate identifiers, issuing CABs, certified objects, scopes, versions, validity periods and current status;
- evidence that the Wallet Provider satisfies the applicable national admission conditions established under national law;
- a description of the relevant organisational, technical and contractual dependencies and interfaces between the Wallet Provider, Wallet Solution, PID Provider and national electronic identification scheme;
- a statement of known changes, limitations, exclusions, open findings, suspensions, incidents or other circumstances that may affect the proposed certification;
- other assurance evidence for which the applicant requests reliance; and
- the completed application and contractual information required by the CAB.

The CAB shall review the application for completeness, resolve ambiguities in the proposed scope, verify that it has the competence and resources required, and determine whether the

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object is eligible for certification. The CAB shall not commence the evaluation until the object, certificate set, admission conditions and relevant interfaces are sufficiently defined.

8.3 Evaluation planning

The CAB shall prepare an evaluation plan proportionate to the composite nature and risk of the object. The plan shall identify the requirements, subordinate results relied upon, verification activities, uncovered matters requiring supplementary evaluation, responsible personnel, schedule, sampling, reporting and decision interfaces.

The evaluation plan shall distinguish clearly between:

- conformity aspects accepted on the basis of valid and applicable subordinate certificates;
- certificate-level verification activities performed by the top-level CAB;
- national admission conditions requiring direct verification;
- dependencies, interfaces and collective coverage requiring top-level evaluation; and
- gaps or uncertainties requiring supplementary evaluation.

A kick-off meeting may be used to confirm the scope, evidence access, communication arrangements, treatment of confidential information and handling of findings. Agreement with the applicant shall not transfer responsibility for the design or adequacy of the evaluation plan.

8.4 Evaluation phase

8.4.1 Verification of subordinate certification results

For every mandatory subordinate certificate or conformity assessment result, the CAB shall verify authenticity, issuing-body competence, applicable accreditation and authorisation, certified object, scope, relevant versions, validity, status, conditions, limitations and continuing applicability. Verification shall use authoritative certificate information or confirmation obtained from the issuing CAB or applicable register.
The CAB shall establish and document a traceable relationship between each subordinate result and the part of the top-level object and requirements for which reliance is accepted.

8.4.2 Evaluation of collective coverage and interfaces

The CAB shall evaluate whether the subordinate results, considered collectively, cover the complete top-level object. This evaluation shall include the consistency of entity identities and versions, the compatibility of scopes, the link between the Wallet Provider and PID Provider, and the operational and security dependencies at their interfaces.
The CAB shall identify overlaps, gaps, conflicting assumptions, conditions, exclusions and residual risks. A subordinate certificate shall not be relied upon beyond its stated scope or applicability.

8.4.3 Verification of national admission conditions

The CAB shall verify the applicant’s fulfilment of each applicable national admission condition that forms part of the top-level certification object. Evidence of admission shall be current, attributable to the applicant and applicable to the Wallet Solution and PID Provider relationship in scope. Where national law reserves an admission determination to a competent authority, the CAB shall verify the authoritative determination and shall not substitute its own decision for that authority.

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8.4.4 Supplementary evaluation

Where the evidence set is incomplete or insufficient, the CAB shall perform or require supplementary evaluation limited to the uncovered matter. Methods may include document review, interview, observation, technical verification, testing, inspection of records or direct confirmation from an issuing body. Supplementary evaluation shall not be used to replace a mandatory subordinate certificate.

8.5 Evaluation findings and report

The CAB shall classify and resolve findings in accordance with NL-SYS-01 and NL-SYS-05. A positive recommendation shall not be made while a mandatory certificate is absent, expired, suspended, withdrawn, insufficient in scope, or while a material top-level gap or unresolved major nonconformity remains.

The Evaluation Report shall provide sufficient information for independent review and decision. It shall include at least:

- identification and scope of the top-level object;
- applicable requirements and admission conditions;
- the subordinate certificate inventory and verification results;
- a coverage and traceability analysis;
- evaluation of dependencies, interfaces, limitations and residual risks;
- supplementary evaluation performed and evidence obtained;
- findings and their disposition;
- a conclusion on whether sufficient and appropriate evidence supports conformity; and
- a recommendation for the certification decision.

8.6 Review and certification decision

A person or function not involved in the evaluation activities shall review the evaluation information in accordance with ISO/IEC 17065. The certification decision shall be made by the CAB on the basis of the complete evaluation record and shall not be delegated to an external body.

A positive decision requires all of the following:

- all mandatory subordinate certificates are authentic, valid, in force, applicable and sufficient in scope;
- all applicable national admission conditions included in the certification object are fulfilled;
- collective coverage of the Wallet Provider, Wallet Solution and linked PID Provider is demonstrated;
- material dependencies and interfaces have been evaluated;
- any supplementary evaluation has been completed;
- no unresolved major nonconformity or evidence gap prevents a conformity conclusion; and
- the proposed certificate scope accurately reflects the demonstrated conformity.

Where the decision is negative, the CAB shall inform the applicant of the reasons and of the applicable complaint and appeal arrangements. Complaints and appeals shall be handled under NL-SYS-01 and the CAB's documented procedures.

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8.7 Certificate of conformity

Following a positive decision, the CAB shall issue a top-level certificate of conformity. The certificate shall identify at least:

- certificate title and unique identifier;
- name and legal identity of the certificate holder;
- identification of the Wallet Solution and version(s) in scope;
- identification of the government-assigned PID Provider linked to the certified object;
- a clear description of the object and scope of certification;
- reference to NL-TL and its version;
- identifiers and scopes of the mandatory subordinate certificates on which the top-level certificate depends;
- applicable conditions, limitations or exclusions;
- date of certification decision, issue date and expiry date;
- name and identification of the issuing CAB; and
- a statement that validity is conditional on the continuing validity and applicability of the referenced subordinate certificates and fulfilment of applicable admission conditions.

The certificate shall not imply certification of an entity, service, component or version outside the demonstrated scope. The CAB shall provide certificate information to the Scheme Owner for inclusion in the applicable register in accordance with NL-SYS-01 and NL-SYS-03.

8.8 Validity and continuing conditions

The validity period of the top-level certificate shall not exceed the period permitted by NL-SYS-01 and shall never extend beyond the point at which the CAB can no longer establish continuing conformity.

The certificate remains conditional upon:

- continued validity and applicability of every mandatory subordinate certificate;
- continued fulfilment of applicable national admission conditions;
- continued applicability of the certified Wallet Solution and PID Provider relationship;
- fulfilment of surveillance and change-notification obligations; and
- effective resolution of findings and corrective actions.

Where subordinate certificates have different expiry dates, the CAB shall establish surveillance and recertification arrangements that prevent reliance on an expired or otherwise invalid result. Renewal of a subordinate certificate does not automatically renew the top-level certificate; the CAB shall verify the renewed certificate and assess any resulting change before continuing reliance.

8.9 Surveillance

The CAB shall conduct surveillance throughout the certificate life cycle in accordance with NL-SYS-01. Surveillance shall be risk-based and shall determine whether the conditions supporting the top-level decision remain satisfied.

Surveillance shall include at least:

- checking the status, validity, scope and applicability of all mandatory subordinate certificates;

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- checking continued fulfilment of applicable national admission conditions;
- reviewing changes to the Wallet Provider, Wallet Solution, linked PID Provider, certified versions and relevant interfaces;
- reviewing incidents, vulnerabilities, complaints and regulatory or supervisory information relevant to the certified object;
- reviewing findings and surveillance results produced under subordinate schemes when relevant to top-level conformity;
- evaluating whether the collective certificate set remains complete and mutually consistent; and
- performing supplementary evaluation where available evidence is insufficient.

The CAB shall document each surveillance conclusion and any resulting decision. Where another CAB issued a subordinate certificate, the top-level CAB shall obtain sufficient status and result information without assuming responsibility for that subordinate CAB's certification decision.

8.10 Changes to the certified object

The certificate holder shall notify the CAB without undue delay of changes that may affect conformity, including changes to legal identity, Wallet Solution version or architecture, PID Provider relationship, certified service scope, admission status, interfaces, contractual responsibilities, or mandatory subordinate certificates.

The CAB shall assess the impact of the change and determine whether the existing certificate may continue unchanged, requires scope amendment or additional evaluation, shall be suspended, or requires recertification. The CAB shall not extend the certificate scope solely on the basis of notification.

8.11 Suspension, termination, withdrawal and expiry

The general rules of NL-SYS-01 apply. The CAB shall suspend the top-level certificate where a condition essential to continued conformity is temporarily not satisfied or cannot be confirmed, including where a mandatory subordinate certificate is suspended, expires without accepted replacement, becomes insufficient in scope, or where an admission condition is no longer fulfilled pending resolution.

The CAB shall withdraw the top-level certificate where the grounds cannot be remedied, a mandatory subordinate certificate is withdrawn without an acceptable replacement, the certificate holder no longer satisfies an indispensable admission condition, or conformity can no longer be demonstrated. Termination may occur at the certificate holder's request subject to the applicable rules.

The CAB shall notify the Scheme Owner of suspension, termination, withdrawal and expiry in accordance with NL-SYS-01 and NL-SYS-03. The certificate holder shall cease claims and use of the mark of conformity to the extent required by the decision.

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8.12 Recertification

Recertification shall be completed before expiry if continuity of certification is required. The CAB may rely on current subordinate certification and surveillance evidence, but shall perform a new review and certification decision for the complete top-level object. Recertification shall confirm the current certificate set, current Wallet Solution versions, current PID Provider relationship, current admission status, closure of previous findings, relevant changes and incidents, and continued sufficiency of collective coverage. Evidence from the previous cycle may be reused only where its continuing relevance is demonstrated.

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9 Top-level Certificate Control and Lifecycle Coordination

9.1 Dependency register

The CAB shall maintain a controlled dependency register for every top-level certificate. The register shall identify all subordinate certificates, declarations, admission determinations, entities, versions and interfaces on which the top-level certificate depends. Each entry shall identify its owner, authoritative source, status, validity period, conditions and relationship to the certified scope.

9.2 Status monitoring and information exchange

The CAB shall establish arrangements to receive or obtain information on status changes affecting the dependency register. Contractual arrangements shall require the certificate holder to report relevant changes and shall permit the exchange of information necessary for certification decisions, subject to confidentiality and data-protection requirements.
Where information indicates suspension, withdrawal, expiry, material limitation, significant incident or relevant change, the CAB shall initiate and document an impact assessment without undue delay.

9.3 Impact assessment

The impact assessment shall determine which part of the certified object is affected, whether sufficient alternative evidence exists, whether supplementary evaluation is necessary, and whether the top-level certificate may remain valid, requires scope reduction or amendment, or shall be suspended or withdrawn.

A top-level certificate shall not remain presented as fully valid where an indispensable dependency is no longer valid or applicable. Partial continuation is permissible only where the certificate scope can be clearly and formally reduced and the remaining conformity is independently supported.

9.4 Coordination with subordinate CABs and the Scheme Owner

The top-level CAB shall coordinate evidence and status information with subordinate CABs where necessary, while retaining sole responsibility for its own top-level decision. The Scheme Owner shall be informed in accordance with NL-SYS-01 of certificate decisions and status changes requiring register or system-level action.

9.5 Records

The CAB shall retain the dependency register, verification records, impact assessments, correspondence, evaluation reports, review records and decisions for the period specified in NL-SYS-01. Records shall provide a complete audit trail from each top-level conclusion to the subordinate and supplementary evidence used.

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10 Final Provisions

10.1 National legislation

This scheme shall be applied together with the national legislation governing the NL electronic identification scheme and the admission of Wallet Providers. Where national legislation assigns a determination to a competent authority, the CAB shall verify that determination as evidence and shall remain within its conformity assessment mandate.

10.2 Certification contracts

The CAB shall conclude an enforceable certification agreement with the applicant. The agreement shall cover access to evidence, change notification, surveillance cooperation, use of certificates and marks, confidentiality, information exchange, complaints and appeals, and the consequences of suspension, termination, withdrawal and expiry. Contractual terms shall not prejudice the CAB's impartiality or decision-making responsibility.

10.3 Costs

Certification costs shall be based on the activities necessary to obtain sufficient and appropriate evidence and to maintain certification. Reliance on valid subordinate results should avoid unnecessary duplication but shall not restrict supplementary evaluation where required.

10.4 Effective date and transitional arrangements

This version applies from the effective date determined by the Scheme Owner. Transition from an earlier version shall be managed in accordance with NL-SYS-01. The CAB shall assess the impact of revised requirements on existing certificates and shall document any transition actions and deadlines established by the Scheme Owner.

10.5 Interpretation and precedence

NL-SYS-01 and applicable law prevail where this scheme conflicts with system-level rules or legal requirements. Questions of interpretation shall be escalated through the governance mechanism established by the Scheme Owner. Interpretation shall not be used to waive a mandatory certification condition.

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Annex A (Normative) — Mandatory Evidence and Dependency Matrix

This annex defines the minimum evidence structure for the composite top-level evaluation. The CAB shall tailor the matrix to the certified object without removing applicable evidence categories.

Evidence category	Minimum verification	Top-level use
Wallet Provider certification	Identity, issuing CAB, accreditation/authorisation, scope, status, validity, conditions and certificate holder.	Demonstrates certified provider-level services and controls.
PID Provider certification	Identity, issuing CAB, scope, status, validity, conditions and linkage to the applicant.	Demonstrates certified PID-provider services supporting the object.
Wallet Solution functional certification	Certified product, version, configuration, functional scope, status and limitations.	Demonstrates functional conformity of the Wallet Solution.
Wallet Solution cybersecurity certification	Certified components and versions, assurance scope, status, dependencies and limitations.	Demonstrates cybersecurity conformity within the certified scope.
National admission evidence	Issuing authority, applicant, scope, effective status, conditions and continuing applicability.	Demonstrates fulfilment of admission conditions included in the object.
Interface and dependency evidence	Responsibilities, boundaries, data and trust flows, version compatibility, change and incident interfaces.	Supports evaluation of matters crossing subordinate scopes.
Other assurance evidence	Issuer competence, scope, method, date, findings, limitations and traceability.	May supplement, but not replace, mandatory subordinate certificates.

Annex B (Normative) — Composite Evaluation Framework

B.1 Purpose

This annex establishes the minimum method for evaluating the composite top-level object and for documenting reliance on subordinate certification results.

B.2 Evaluation sequence

1. Define the legal entities, services, products, versions, PID Provider relationship and admission conditions forming the proposed object.
2. Compile the dependency register and identify every mandatory subordinate result.
3. Verify authenticity, status, competence of the issuer, scope, version and applicability of each result.
4. Map each applicable top-level requirement to subordinate or supplementary evidence.
5. Analyse collective coverage, overlaps, gaps, assumptions, limitations, dependencies and interfaces.
6. Perform supplementary evaluation for matters not sufficiently covered.
7. Classify findings and determine whether sufficient and appropriate evidence exists.
8. Prepare the Evaluation Report, conduct independent review and make the certification decision.

B.3 Reliance determination

Reliance shall be recorded as Full, Partial or None for the specified conformity aspect. Full reliance is permitted only where the evidence is valid, applicable and sufficient for that aspect. Partial reliance shall identify the exact coverage and supplementary work. No reliance shall be recorded where authenticity, competence, scope, validity, applicability or sufficiency is not demonstrated.

B.4 Coverage analysis

The coverage analysis shall relate each requirement to the certified entity, service, product, component and version. It shall show the evidence source, reliance determination, limitations, supplementary activities, findings and conclusion. Collective coverage shall be assessed in addition to individual certificate validity.

B.5 Interface evaluation

For each material interface, the CAB shall identify the parties, allocated responsibilities, technical and operational boundary, exchanged information, trust mechanism, change process, incident process and evidence of effective implementation. Where an interface is covered only from one side by subordinate certification, the CAB shall evaluate the uncovered side or require appropriate evidence.

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B.6 Findings and decision input

The evaluation team shall not make the certification decision. Its report shall state factual findings, evidence limitations and a recommendation. The independent reviewer and decision maker shall have access to the complete record necessary to confirm the evaluation conclusion.

B.7 Sampling

Sampling may be used for supplementary evaluation where complete examination is impracticable. Sampling shall be risk-based and documented. It shall not be used to avoid verification of any mandatory certificate, admission determination, entity identity, version or indispensable dependency.

B.8 Competence

The evaluation team shall collectively possess competence in product and service certification, EUDI Wallet architecture, electronic identification, cybersecurity, functional conformity, provider governance, applicable legal requirements, evidence evaluation and the subordinate certification schemes relied upon.

B.9 Confidentiality and information exchange

Evidence shall be handled according to its sensitivity. Information exchange between CABs shall be limited to what is necessary for conformity assessment and shall preserve confidentiality, data protection, integrity and traceability.

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Annex C (Normative) — Minimum Contents of the Evaluation Plan

- evaluation identification, type and responsible CAB;
- applicant and proposed certificate holder;
- defined object and scope, including Wallet Solution versions and linked PID Provider;
- applicable scheme version, requirements and national admission conditions;
- dependency register and subordinate certificate inventory;
- planned certificate-status and scope verification;
- coverage, dependency and interface analyses;
- proposed reliance determinations and identified evidence gaps;
- supplementary evaluation methods, sites, samples and technical activities;
- evaluation team, competence and impartiality arrangements;
- schedule, communications, access and confidentiality arrangements;
- reporting, review and decision interfaces;
- known limitations, assumptions and contingencies; and
- change control for the evaluation plan.

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Annex D (Normative) — Minimum Contents of the Evaluation Evidence Record

- requirement or conformity aspect assessed;
- applicability determination and rationale;
- entity, service, product, component and version concerned;
- evidence source and authoritative reference;
- certificate identifier, issuing body, scope, validity and status where applicable;
- issuer competence, accreditation and authorisation verification;
- reliance determination and extent of accepted coverage;
- conditions, limitations, exclusions and unresolved findings;
- dependency or interface affected;
- supplementary evaluation method and sample where applicable;
- objective evidence obtained;
- evaluation result and rationale;
- cross-reference to findings, corrective actions and report sections; and
- evaluator identity and date.

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Annex E (Normative) — Evaluation Results Matrix

The CAB shall use an evaluation matrix containing at least the fields below. The matrix may be implemented as a controlled record separate from the Evaluation Report, provided traceability is maintained.

Field	**Required content**
Requirement ID	Unique identifier of the applicable top-level requirement.
Applicability	Applicable or Not applicable, with approved rationale for any exclusion.
Object element	Entity, service, product, component, version or interface assessed.
Evidence source	Subordinate certificate, admission evidence, other assurance evidence or supplementary evaluation.
Reliance	Full, Partial or None, limited to the stated conformity aspect.
Coverage	Requirements and scope demonstrated by the evidence.
Limitations	Conditions, exclusions, gaps, assumptions or expiry dependencies.
Supplementary activity	Additional review, interview, observation, testing or verification performed.
Result	Conforming, Major nonconformity, Minor nonconformity, or Not concluded.
Traceability	References to evidence records, findings and report sections.

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Annex F (Normative) — Minimum Contents of the Top-level Certificate

- unique certificate identifier and certificate title;
- legal name and identifier of the certificate holder;
- legal name and identifier of the Wallet Provider;
- Wallet Solution name and precise version(s) or configuration(s) in scope;
- identity of the linked government-assigned PID Provider;
- description of the certified top-level object and scope;
- reference to NL-TL and its applicable version;
- identifiers of mandatory subordinate certificates and the scopes relied upon;
- conditions, limitations and exclusions;
- certification decision date, issue date and expiry date;
- issuing CAB identity and authorised signature or equivalent authentication;
- certificate status information or authoritative register reference; and
- statement of dependency on continuing subordinate certificate validity and applicable admission conditions.

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