

6 May 2026

Feedback of

Association for Competitive Technology  
(Transparency Reg. # 72029513877-54)

Square de Meeus 35,  
1000 Brussels, Belgium

to the

European Commission

regarding the

European Business Wallet

## I. Introduction

The Association for Competitive Technology (hereafter ‘ACT’) welcomes the opportunity to submit comments to the European Commission’s consultation on the European Business Wallet proposal.

ACT is a policy trade association for the **small business technology developer community**. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology. Today, the ecosystem ACT represents—which we call the app economy—is valued at approximately €95.7 billion and is responsible for more than 1.4 million jobs in the European Union (EU).<sup>1</sup>

## II. European Business Wallet

ACT supports the proposal put forward by the European Commission on the European Business Wallet (EBW) and welcomes the opportunity to offer our members’ perspective. As an association representing small business technology developers across the EU, ACT has a direct stake in ensuring that this proposal delivers on its promise of reduced administrative burden and greater market access without creating new barriers for the startups and SMEs that are the backbone of the European economy.

First and foremost, ACT urges policymakers to enshrine voluntariness as a foundational part of the EBW. Use of the wallet must remain a genuine choice for businesses, and particularly for startups and small and medium-sized enterprises (SMEs). A de facto obligation, for instance, one that arises when public authorities exclusively accept wallet-based credentials, would undermine this principle and place a disproportionate burden on smaller players. The EBW should earn adoption because it demonstrably works, not because businesses have no alternative. When the system delivers real value, ACT is confident that startups and SMEs will join in growing numbers. To support that uptake, the Commission should invest in structured technical assistance, including practical onboarding guides, training materials, and compliance toolkits tailored to the capacity constraints of small businesses.

At the same time, ACT recognises that the EBW can only fulfil its potential if public authorities are required to accept it. Voluntary use by businesses must be matched by a mandatory acceptance obligation on the public sector side; without that commitment, the wallet risks becoming an underutilised tool rather than the transformative infrastructure the Commission envisions. ACT therefore calls on co-legislators to establish a clear and enforceable obligation for relevant public authorities to recognise and process EBW credentials.

ACT stresses that simplicity is a prerequisite, not an aspiration. The EBW must genuinely reduce administrative costs and streamline compliance processes. If onboarding proves complex or costly, the very companies the initiative is designed to help—resource-constrained startups and small

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<sup>1</sup> See [220912\\_ACT-App-EU-Report.pdf](#).

developers—will be the first to fall through the cracks. No technical, regulatory, or pricing barriers should stand between SMEs and access to the wallet. Complexity in implementation is not a neutral outcome; it is, in effect, a barrier to entry for the most vulnerable and resource-restricted market participants.

ACT also urges the Commission to ensure that the EBW is designed from the outset to be fully interoperable with the proposed EU Inc. regime. The EU Inc. proposal aims to create a single, supranational corporate form that startups and scaleups can use to operate seamlessly across the single market. The EBW and EU Inc. are complementary initiatives: both are premised on the idea that businesses should not have to navigate 27 different national administrative environments. If the two frameworks are not designed to work together, that ambition will be undermined from day one. Concretely, this means that an EU Inc. entity should be able to use the EBW to fulfil its registration, identification, and compliance obligations without having to interface with parallel national systems. The Commission should treat interoperability between the EBW and the EU Inc. framework as a design requirement, not an afterthought, and engage with both work streams in a coordinated manner.

Finally, ACT calls for full harmonisation at the European level. Parallel national structures or additional country-specific identifiers would fragment the single market gains the EBW is meant to deliver. A patchwork of national implementations would force businesses, especially those operating across borders, to navigate multiple systems, negating the efficiency gains and adding compliance overhead that small developers simply cannot absorb. A single, fully harmonised European framework is the only outcome consistent with the EBW's stated objectives.

We stand ready to work with the co-legislators to ensure that the European Business Wallet delivers on its promise: a future in which European startups and scaleups can innovate, grow, and compete on a level playing field creating jobs, driving investment, and ensuring Europe remains a leader in global innovation.

Sincerely,



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