

ANNEX A: MODEL FOR THE REQUEST FOR THE RELEASE OF FUNDS

Fiche to be used for each step:

The step under review	Compliance with the EU Digital Identity Regulation
Baseline	Digital Identity Regulation not in place
Deadline of the step	June 2026
Actual results	The concept document for the new Law on electronic identification and trust services in electronic transactions which compressed digital wallet has been successfully prepared by Governmental Working Group which consists of members from many agencies and responsible Ministries. This document serves as a foundational policy instrument, defining the objectives, scope, and key principles that will guide the legislative framework. It reflects initial analysis, stakeholder considerations, and alignment with relevant strategic priorities. The concept document is planned to be approved by the Government once established. Upon approval of the concept document by the Government, the process will proceed with the drafting of the new Law. This phase will include: • Preparation of the initial draft of the Law based on the approved policy framework, • Inter-institutional consultations to ensure coherence with existing legislation and policies, • Engagement with relevant stakeholders, where applicable, • Legal and technical refinement of the draft text. Moreover, the IT Department within Ministry of Digitalisation and Public Administration (MDPA) has prepared an initial draft of this Draft Law, on which the Working Group can continue working after its official establishment.
Evidence provided	1. Decision prot.no.3674 establishing working group for Concept Document on electronic identification and trust services in electronic transactions (original and translated) 2. Draft Concept Document on electronic identification and trust services in electronic transactions;
Checks performed in the verification of the step and related findings	During verification of the step, all available and possible evidence has been collected and reviewed. The evidence has been listed down in the checklist on the conducted verification, and all documents supporting the verification have been properly stored (in order to ensure audit trail).

	The following checks were conducted: • All available documentation in line with the level of the achievement (as attached to this report) has been reviewed to verify the current stage of the reform step; • Compliance with the descriptive part of the reform step from the Commission Implementing Decision has been verified to the maximum possible extent and scope (as evidenced by the documentation available); • The attached documentation can confirm non-fulfilment of the reform step. The results of the checks indicate that the reform step has not been fulfilled by the end of the reporting period (30 Jun 2026). As soon as the information is received by the implementing units on the complete achievement and fulfilment of the reform step, the checks will be re-performed and repeated to verify the underlying completion / fulfilment.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	There are no contributions of third parties supporting the achievement of this step.
Clear conclusion on the achievement of the step	This reform step has not been achieved by 30 Jun 2026 deadline. It is moved to the grace period.



**Republika e Kosovës
Republika Kosova-Republic of Kosovo
Qeveria Vlada-Government**

*Ministria e Digjitalizimit dhe Administratës Publike
Ministarstvo za digitalizaciju i javnu administraciju
Ministry of Digitalization and Public Administration*

**CONCEPT DOCUMENT ON ELECTRONIC IDENTIFICATION, TRUST SERVICES
AND THE DIGITAL IDENTITY WALLET**

April, 2026

Table of Contents

Explanation of Abbreviations	4
Summary of the Concept Document	5
Chapter 1	13
Problem definition	13
Current situation and challenges	13
Chapter 2	31
Objectives	31
Experience from other countries in the use of e-ID and the digital identity wallet	31
<i>Case of Belgium</i>	31
<i>Case of Austria</i>	31
<i>Case of Albania</i>	31
3.1 Option 1: No changes	33
3.2 Option 2: Enhancing the application and enforcement of the existing legal framework	33
3.3 Option 3: New legal framework	35
Chapter 4	41
Identification and assessment of future impacts	41
4.1 Challenges in data collection	43
Chapter 5	44
Communication and consultation	44
Chapter 6	51
Comparison of options	51
Option 1: No changes	51
Option 2: Enhancing the implementation of the existing legal framework	51
Option 3: Establishing a new legal framework (full transposition of eIDAS 2.0)	52
6.1 Implementation plans for the various options	57
Chapter 7	64
Conclusion and next steps	64
7.1 Monitoring and evaluation provisions	66
Annex 1: Economic impact assessment form	70
Annex 2: Social impact assessment form	71
Annex 3: Environmental impact assessment form	75

Annex 4: Fundamental rights impact assessment form	81
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Explanation of Abbreviations

GoK - Government of Kosovo

ME - Ministry of Economy

NDP - National Development Plan 2025 - 2027

MIA - Ministry of Internal Affairs

CRA - Civil Registration Agency

KBRA - Kosovo Business Registration Agency

AIS - Mission of the Agency of Information Society

MIET - Ministry of Innovation, Entrepreneurship and Trade

MEST - Ministry of Education, Science and Technology

MFLT - Ministry of Finance, Labor and Transfers

MDPA - Ministry of Digitalization and Public Administration

KAD - Kosovo Accreditation Directorate

TSP - Trusted Service Providers

KD - Concept Document

eIDAS 1.0 - 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

eIDAS 2.0 - Regulation (EU) No. 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No. 910/2014 as regards establishing the European Digital Identity Framework

eID - Electronic Identification

SAA - Stabilization and Association Agreement

Summary of the Concept Document

The Concept Document on electronic identification, trust services and the digital identity wallet analyses the current situation and identifies the absence of a complete, aligned and functional legal and institutional framework for electronic identification and trust services in the Republic of Kosovo.

The existing legal and institutional framework is not aligned with the requirements of the European Union eIDAS 2.0 Regulation, which creates limitations in the security, reliability and interoperability of electronic services, and hinders Kosovo's integration into the European digital space.

The general objective of this Concept Document is to align the legislation of the Republic of Kosovo with the EU eIDAS 2.0 Regulation, through the establishment of a sustainable legal and institutional framework that enables secure electronic identification, the provision of trust services, and the development of the digital identity Wallet.

Within this Concept Document, three options have been reviewed and analyzed.

Option 1 - This option preserves the current legal framework and offers an immediate advantage by avoiding the short-term costs associated with legislative amendments. However, it leaves regulatory gaps that may result in an unfavorable position for public and private institutions.

Option 2 - This option envisages strengthening the implementation and enforcement of the existing legal framework, providing a faster and more cost-effective short-term solution. Nevertheless, it does not ensure full and sustainable alignment with European standards over the long term.

Option 3 - This option envisages a new Law on Electronic identification, trust services and the Digital Identity Wallet. It requires greater initial investment and broader institutional commitment, but provides a more sustainable long-term solution and establishes the legal and technical foundation necessary to ensure the secure and reliable operation of the digital identity Wallet in Kosovo.

The implementation of the preferred option is expected to enhance the security and reliability of public and private electronic services, strengthen interoperability with European electronic identity systems, establish the legal and institutional framework for the digital identity Wallet, and further advance the integration of the Republic of Kosovo into the European digital market and common digital space.

Comprehensive analyses of the assessed options, impact evaluations, and proposed next steps for implementation are presented in the remainder of this document.

General information	
Title	Concept Document on Electronic Identification, Trust Services and the Digital Identity Wallet
Implementing Ministry	Ministry of Digitalization and Public Administration Department of Information and Communication Technology
Contact person	Ajshe Jashari - Head of Information Technology Division / Chair of the Working Group; email: ajshe.jashari@rks-gov.net , Contact number - 03820021585
NDP	The Concept Document for the creation of the Law on Electronic Identification, Trust Services and the Digital Identity Wallet Strategic goals: 2.6. Development of high-quality broadband electronic communication networks and services, Measure: 2.6.1. “Developing the Infrastructure in the area of ICT and the Digital Economy”
Strategic priority	1. Pillar I of the NDP 2025–2027: “Sustainable economic growth”. Goal 2.6 – Goal Development of high-quality broadband electronic communication networks and services 2. Measure 2.6.1 – Drafting and approval of the CD for the transposition of the eIDAS Regulation 2.0. 2. Digital Agenda of Kosovo 2030: Strategic objective 2 – Digital transformation of businesses <i>Specific objective 2.3: Support the development of innovative ICT sector for stronger digital growth</i> Strategic objective 3 – Digitalization of public services <i>Specific objective 3.2: Digitalization of public administration in all segments</i> 3. Kosovo e-Government Strategy 2023-2027 : Strategic objective 4: Public digital services are user-centered, inclusive and actively of used; <i>Specific objective: Prerequisites created for digital services in the public and private sectors;</i> <i>Specific objective: Actively used public digital services</i>

Decision	
Key issue	The legal and technical infrastructure for electronic identification and trust services in Kosovo is still based on existing laws and regulations, which do not fully address the challenges and requirements of the digital market or EU integration. The absence of an updated legal framework aligned with the advanced standards of eIDAS 2.0 creates obstacles to security, interoperability

	and usability of these services, constraining the development of the digital economy and limiting opportunities for citizens and businesses to utilize them. To address these shortcomings, a sustainable and comprehensive legal solution is required, encompassing the regulation of electronic identity and the digital identity wallet, strengthening data security, and establishing conditions for international integration. Failure to adopt an appropriate framework will continue to impede the creation and utilization of electronic services, diminish user confidence in these services, and slow down Kosovo's integration into the EU market. The lack of a legal and technical infrastructure adapted to the digital market presents significant barriers to the digitalization and effective use of trust services, thereby slowing down progress towards a modern and efficient economy. Moreover, the absence of a clear and integrated legal framework increases the risk of breaches in cybersecurity and citizens' privacy. Without reliable standards and updated protective mechanisms, personal data and electronic identities remain exposed to cyberattacks, undermining the trustworthiness of trust services and the protection of personal data. Legal and technological constraints will create barriers to international cooperation and the interoperability of electronic systems with EU member states, adversely impacting Kosovo's economic and administrative development. Furthermore, electronic services will not be reliably usable or recognized by international partners, posing obstacles to integration into the European Single Market and limiting prospects for further development.
Consultation summary	The draft was issued for preliminary consultation on 22.12.2025. During this process, feedback was received from the Office of Strategic Planning, primarily addressing the elaboration of the administrative burden across the three proposed options. Feedback was also received from the Government Secretariat, focusing on aligning the draft with the Guidelines for Drafting the Concept Documents, including the reorganization and repositioning of specific paragraphs within the CD. As the comments were submitted by the officer who had been part of the Working Group, all of them were considered and addressed during the joint meeting held on 20.01.2026. On 30.01.2026, a meeting took place with the MFLT officer to review the received comments concerning the costing of activities and to obtain instructions on the appropriate manner of addressing them.

Proposed option	Drafting a new Law on Electronic Identification, Trust Services and the Digital Identity Wallet
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Key expected impacts	
Budgetary impacts	The considered option funded through the Budget of the Republic of Kosovo.
Economic impacts	Aligning national legislation with the eIDAS 2.0 Regulation is expected to have a direct impact on improving economic efficiency and enhancing the business environment. Alignment with EU standards will increase the reliability and security of electronic services, encouraging the use of electronic identification and trust services across sectors such as finance, public administration, e-commerce and healthcare. This alignment will reduce administrative costs, facilitate international interoperability of systems, and enable the expansion of Kosovar businesses into European markets. While initial investments in technological infrastructure and professional capacity building are necessary, the long-term benefits include enhanced competitiveness, stimulation of innovation, and the gradual integration of Kosovo into the European and global digital economy.
Social impacts	Aligning legislation with the eIDAS 2.0 Regulation is anticipated to expand the user base for electronic services and improve equal access to both public and private services, easing interactions among citizens, institutions and businesses. It will strengthen the protection of personal data, privacy, and trust in digital platforms, while also fostering digital literacy and awareness. In contrast, failure to adapt the regulation will exacerbate the digital gap, reduce online service usage, and increase the risk of infringements on fundamental rights.
Environmental impacts	Aligning national legislation with the eIDAS 2.0 Regulation is expected to have a positive environmental impact by reducing reliance on paper and physical documents, conserving natural resources, and decreasing carbon emissions associated with physical document handling. Conversely, failure to adapt the regulation will result in increased use of physical materials and higher levels of pollution, hindering the achievement of environmental sustainability goals.

Cross-sectoral impacts	Alignment of legislation with the eIDAS 2.0 Regulation is anticipated to positively impact multiple economic and societal sectors by modernizing public services, enhancing their quality and efficiency, and strengthening the security and reliability of personal data. The facilitation of electronic transactions will enable market expansion, foster cross-border trade, and accelerate financial processes, thereby supporting economic growth. Failure to adapt the regulation may lead to sectoral fragmentation, lack of coordination between sectors, increased administrative burdens, and barriers to developing digital infrastructure.
Administrative burden for businesses	Aligning legislation with the eIDAS 2.0 Regulation is expected to reduce administrative burdens and create facilitation for identity verification and the use of electronic signatures via the digital identity wallet. This will improve efficiency, save time and resources in operational processes, and create opportunities for expansion into international markets. However, in addition to these benefits, investments in infrastructure and staff training are required to ensure compliance with security and data protection standards. Failure to adapt the regulation will increase procedural complexity, operational costs and exposure to cybersecurity risks and reputational damage.
SMEs test	Aligning legislation with the eIDAS 2.0 Regulation is expected to positively impact the digitalization and use of electronic services by SMEs, facilitating access, speeding up administrative processes, and increasing transaction security. This will create a more reliable and secure environment, enabling the development and improvement of the services they provide. Failure to adapt the eIDAS 2.0 Regulation will limit access to electronic services, slow down administrative processes, and place SMEs at a disadvantage compared to more developed markets.

Next steps	
Short-term	In the short term, the following activities will be included: 1. Establishment of the inter-institutional Working Group (WG) to draft the new law; 2. Conducting consultations with stakeholders; 3. Preparation of the initial draft of the law;

	4. Evaluation and alignment of the draft with existing legislation and regulations; 5. Organization of preliminary and public consultations on the draft; 6. Finalization of the draft law.
Mid-term	The medium-term activities will include: 1. Submission of the draft law for approval by the Government and the Assembly; 2. Drafting of bylaws; 3. Development of the technical infrastructure; 4. Training and awareness-raising for relevant stakeholders; 5. Alignment with the existing eID system; 6. Licensing and certification of trusted service providers.

Introduction

This Concept Document (CD) has been developed to establish the most suitable approach for transposing the European Union eIDAS 2.0 Regulation into the legislation of the Republic of Kosovo, aligning the legal and institutional framework with European standards in electronic identity and trust services. The preparation of this document responds to the need to update the existing legal framework, enhance the security and reliability of electronic services, advance the development of the electronic identity wallet, and support Kosovo's integration into the European digital space.

The rapid evolution of the digital economy and the new requirements introduced by eIDAS 2.0 Regulation underscore the necessity for a comprehensive approach that goes beyond technical aspects, encompassing legal, institutional, organizational, and security dimensions critical for the sustainable functioning of the electronic identity system and the eID Wallet.

This document draws on the strategic priorities of the Republic of Kosovo, including the National Development Plan 2025–2027, the Digital Agenda of Kosovo 2030, and the e-Government Strategy 2023–2027, which aim to promote e-governance, develop a secure digital infrastructure, and facilitate integration into the European digital market.

The Concept Document seeks to provide an analytical foundation for decision-making by offering recommendations to strengthen the legal, institutional, and technical framework, ensure sustainable operation and full interoperability of electronic systems, and enable comprehensive use of the electronic identity wallet.

The document examines existing gaps in the legal and institutional framework related to electronic identification, which create challenges in usability, security, and interoperability of eID systems, affecting the delivery of secure and trusted electronic services. Based on these analyses, the most appropriate option for transposing the EU eIDAS 2.0 Regulation into Kosovo's legislation has been identified and recommended. The CD aims to address legal, institutional, and technical gaps in electronic identification and trust services, ensuring security, reliability, and interoperability of electronic identity systems, establishing the foundation for the development and operation of the digital identity wallet, and supporting Kosovo's integration into the European digital market.

This reform initiative is fully aligned with national priorities for digitalization and European integration, as well as with the objective of building a more efficient, transparent, and effective public administration.

Simultaneously, this initiative is connected to the opportunity to benefit from technical and financial support provided by European Union instruments, including the Western Balkans Growth Plan (2023), which seeks to bring the countries of the region closer to the EU single market through structural reforms, including in the digital sector.

The implementation of this legal reform is expected to yield multiple advantages, such as enhanced trust in electronic transactions, improved access to public and private services, reduced administrative burden, improved business environment, and a strengthened position for Kosovo in the process of European digital integration.

This legal reform aims to establish the foundations for a secure and trustworthy digital ecosystem in Kosovo that addresses user needs, fosters innovation, and creates favourable conditions for investment and long-term economic development.

Table 1: General overview of the Concept Document

Title	Concept Document on Electronic Identification, Trust Services and the Digital Identity Wallet
Implementing Ministry	Ministry of Digitalization and Public Administration
Contact person	Ajshe Jashari Head of IT Division / Chairperson of the Working Group Email: ajshe.jashari@rks-gov.net ; Contact no. 03820021585

NDP	National Development Plan (NDP) 2025–2027 Strategic goals: 2.6. Development of high-quality broadband electronic communication networks and services, Measure: 2.6.1. Establishing suitable regulatory conditions for the development of the electronic communications and digital identity sector Activity: Drafting and approval of the Concept Document for the establishment of the Law on electronic identification, trust services and the digital identity wallet
Strategic priority	1. Digital Agenda of Kosovo 2030/ Strategic objective 2 – Digital transformation of businesses 2. Kosovo e-Government Strategy 2023-2027/ Strategic objective 4 - Public digital services are user-centered, inclusive and actively of
Working Group	Members of the Working Group: 1. Ajshe Jashari, Ministry of Digitalization and Public Administration /Chairperson of the WG; 2. Fatos Selimi, Ministry of Economy /Member; 3. Deniza Krasniqi, Ministry of Economy /Member; 4. Nehat Rrahimi, Ministry of Economy /Member; 5. Egzona Raçi, Government Coordination Secretariat/Member; 6. Rexhë Berisha, Ministry of Internal Affairs/Member; 7. Genc Hamzaj, Information Society Agency/Member; 8. Defrim Krasniqi, Kosovo Business Registration Agency/Member; 9. Arben Osmani, Civil Registration Agency/Member 10. Jeton Aliu, Kosovo Accreditation Directorate/Member; 11. Partin Pruthi, Kosovo Banking Association/Member; 12. Barbana Komoni Doci, Central Bank of Kosovo/Member; 13. Jehona Ademi, Ministry of Finance, Labour and Transfers Member; 14. Marcelë Restelica, Regulatory Authority of Electronic and Postal Communications/Member; 15. Dardan Nallbani, Ministry of Industry, Entrepreneurship and Trade/Member
Additional information	During the preparation of this Concept Document, certain limitations and information gaps were identified, which have impacted the comprehensive assessment of policy options and potential implementation costs. These observations aim to clarify the overall context and the constraints that must be taken into account in the next stages of drafting and implementation, including: 1. The lack of international comparative analyses based on the experiences of EU and regional countries in applying the eIDAS 2.0 Regulation, given that this regulation only entered into force in 2024 and most countries are still in the initial phases of implementation. Consequently, there is a lack of sufficient publications or data reflecting practical approaches, challenges, and implementation costs. This

	information gap limits the ability to compare and determine the most appropriate implementation models for the case of Kosovo. 2. The lack of a clear analysis regarding the need for investments and strengthening institutional capacities in relation to long-term benefits, which are considered strategically important for the country. The anticipated challenges arising from the implementation of new standards, along with the preparation of technical and professional capacities, necessitate institutional coordination to ensure the secure and sustainable operation of the electronic identity system, trust services and the digital identity wallet.
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Chapter 1

Problem definition

Current situation and challenges

The existing legislation of the Republic of Kosovo governing electronic identification and trust services is not aligned with the requirements of the new eIDAS 2.0 Regulation. Expert assessments indicate that the current legal framework does not guarantee the sustainable, secure and fully interoperable operation of electronic systems in line with the standards set by the new eIDAS 2.0 Regulation.

The current Law No. 08/L-022 on Electronic Identification and Trust Services in Electronic Transactions is compliant with eIDAS 1.0 Regulation but not with the new EU eIDAS 2.0 Regulation, which establishes common standards for electronic identities, trust services and the European digital identity wallet.

Since the initial adoption of eIDAS 1.0 Regulation in 2014, the infrastructure supporting electronic identification and trust services has undergone substantial development at both the European and global levels, driven by rapid technological advancement, which has shaped evolving requirements for safer, more interoperable, and more sophisticated digital services. In parallel with this rapid technological development, the need to update the existing legal framework has grown.

To ensure a modern, efficient legal framework aligned with European standards for electronic identity and trust services, it is necessary for Kosovo to align its legislation with the new eIDAS 2.0 Regulation.

The current Law No. 08/L-022 on Electronic Identification and Trust Services in Electronic Transactions is aligned with eIDAS 1.0 Regulation but does not include the new elements introduced in version 2.0, such as the digital identity wallet, the use of new technologies, expanded obligations for the private sector, and more advanced user control mechanisms.

To adapt to rapid technological changes and enable Kosovo's integration into the European digital market, aligning the legislation with eIDAS 2.0 has become essential.

This regulatory framework aims to ensure mutual recognition of electronic identification means and trust services with EU member states and other countries, enabling Kosovo's citizens and businesses to access services more easily and securely. This, in turn, will support integration processes, enhancing both economic and social opportunities.

One of the key motivations for transposing eIDAS 2.0 into Kosovo's legislation is the rising demand to enhance security, strengthen trust, and ensure cross-border interoperability of electronic services, necessitating comprehensive legal and institutional reform.

Several significant steps have already been taken to implement the existing law, including the adoption of ten bylaws (regulations) out of a total of eleven planned, as well as the registration of two trusted service providers.

Despite these measures, Kosovo lacks a fully functional electronic identity (eID) system, suffers from limited technical and professional capacity, and faces financial constraints in developing and maintaining the relevant infrastructure, which have hindered the practical application of electronic signatures and seals by public and private institutions and have resulted in only partial implementation of the current legislation.

Awareness campaigns highlighting the benefits of electronic signatures and seals for institutions, citizens, and businesses have also been insufficient.

Although two trusted service providers have been registered with the Ministry of Economy, their adoption and the use of electronic signatures, electronic seals, and forms of electronic authentication in both the public and private sectors remain minimal.

Most public and private institutions continue to require physical documentation and perform services and verifications manually.

Kosovo maintains a centralized system for electronic identity verification through biometric ID cards; however, the practical application of reliable citizen authentication requiring a card reader has never been implemented in practice.

The rapid advancement of ICT has fundamentally transformed the trust electronic services and electronic identification sector, rendering the use of biometric ID card readers outdated and costly.

Modern trends in electronic identity increasingly favour flexible, efficient and cost-effective solutions, such as mobile electronic identity (Mobile ID).

These trends have driven the rapid adoption of mobile applications, cloud services, the Internet of Things (IoT), and other digital technologies, which in turn have elevated the requirements for higher security and reliability in electronic identification systems.

Factors negatively impacting the implementation of electronic identity include:

- Lack of technological devices (card readers) in the relevant public and private institutions;
- Insufficient investment in technical and human resources;
- Lack of user awareness and education.

Under the current law, the establishment and practical application of the digital identity wallet was intended to be regulated through a bylaw. However, following an analysis of the electronic identification (eID) system functionality and expert recommendations, it has been determined that this should be regulated directly by law.

Since January 2023, the Ministry of Economy has initiated the implementation of the electronic identification (eID) system in Kosovo, which is now operational and available through the CRA, enabling the creation of citizens' electronic identities via the digital identity wallet.

The table below presents a comparison of the changes between the eIDAS 1.0 Regulation, the new eIDAS 2.0 version, and Kosovo Law No. 08/L- 022.

Table 2. Comparison of changes between the eIDAS 1.0 Regulation, eIDAS 2.0 and the current Law

Field	eIDAS 1.0 Regulation	eIDAS 2.0 Regulation	Kosovo Law No. 08/H- 022 on Electronic Identification and Trust Services in Electronic Transactions
Electronic identification	It defines the formats and criteria for using identification schemes but does not address the European Digital Identity Wallet (EDIW) and its use.	It introduces the European Digital Identity Wallet (EDIW) and regulates the manner of its use.	It regulates the use of the electronic identification scheme and provides for the regulation of the operation of the digital identity wallet through a bylaw.

Electronic trust services	It regulates basic services such as: electronic signature, electronic seal, electronic time-stamp, and the registered electronic delivery system.	It expands services to include: electronic archiving, electronic registers, electronic attribute verification, and the management of devices for remote electronic signing.	It regulates basic services: electronic signature, electronic seal, electronic time-stamp, and the registered electronic delivery system.
Cross-border interoperability	It operates through eIDAS Nodes, with formal recognition but technical limitations.	It provides a harmonization platform and mandatory recognition of the European Digital Identity Wallet for EU countries.	Referring to Article 11: the use of EU electronic identification means for cross-border authentication shall be permitted, whereas for non-EU countries, the use of electronic identification means for cross-border authentication shall be possible only through a reciprocal agreement.
Involvement of the private sector.	Mainly focused on public services.	Significant involvement of the private sector, including banks, healthcare, tourism, etc.	Enables the participation of both public and private sectors but does not impose specific obligations.
Security and privacy	It defines security levels: low, medium and high.	It specifies and strengthens requirements for multi-factor authentication (MFA) and biometrics.	It defines three security levels, without detailed specifications for multi-factor authentication (MFA) or biometric authentication.
User control over data	Limited user control.	Users are entitled to full control, sharing, and revocation of their data.	The user has limited control over their personal data, including access, modification, deletion and restriction of processing.

Support for new technologies	Advanced technologies such as AI, blockchain, IoT, or biometrics are not included.	Addresses modern technologies: AI, blockchain, IoT, and biometrics.	It focuses only on traditional PKI, without support for advanced technologies.
Attribute certification	It is not included.	It includes verification and certification of professional or social roles and attributes.	It is not included.
Transparency and oversight	Basic rules for the supervision of services and operators.	It increases requirements for regular audits, incident reporting, and technical certifications.	The Ministry acts as the main authority for control and inspection and has the right to audit TSPs.
Using the digital identity wallet	It is not foreseen.	It regulates and promotes the use of the digital identity wallet.	The use of the digital identity wallet is not regulated by law.

From the comparisons made in the table above, it is evident that the existing legislation on electronic identification and trust services is not aligned with eIDAS 2.0 Regulation, thus constituting the major issue for ensuring technical and legal interoperability with European Union systems. As a result, the national electronic identity is not recognized by EU countries, creating significant barriers to the digital integration of the country within the European space. Moreover, the exclusion of the new eIDAS 2.0 concepts from the current legislation, including the European Digital Identity Wallet (EUDI Wallet) and the European standards for establishing a unified electronic identity system, represents a direct obstacle to ensuring access at a high level of security.

In this context, to address the identified gaps and facilitate the alignment of the national framework with the requirements of eIDAS 2.0 Regulation, the table below outlines the existing policy documents, laws, applicable laws and bylaws, along with the roles and responsibilities of the institutions tasked with their implementation. These documents constitute the foundation upon which the necessary legal amendments are based and guided, ensuring alignment of the existing framework with the eIDAS 2.0 Regulation.

Table 3: Relevant policy documents, laws and bylaws

Policy document, law or bylaw	Link to the policy or planning document via internet or with legal acts in the Official Gazette	State institution(s) responsible for implementation	Role and duties of the institution(s)
Digital Agenda of Kosovo 2030	https://arkeprks.org/desk/inc/media/82582FB3-CD31-4D3D-A2AA-F7CC21ACADCA.pdf	1. Ministry of Economy (ME) 2. Agency of Information Society (AIS) 3. Ministry of Education, Science and Technology (MEST) 4. Ministry of Internal Affairs (MIA) 5. Ministry of Agriculture Forestry and Rural Development (MAFRD) 6. Cyber Security Agency(CSA)	Ministry of Economy - responsible for the preparation and approval of the Digital Agenda 2030; Agency of Information Society - responsible for the security of digital services; Ministry of Education, Science and Technology - responsible for developing digital skills for students and teachers; Ministry of Internal Affairs/Civil Registration Agency - creates electronic identification; Ministry of Agriculture, Forestry and Rural Development - supports the digitalization of services in rural areas; Cyber Security Agency - implements cybersecurity standards, monitors cyber threats and protects critical infrastructure.
Kosovo e-Government Strategy 2023-2027	https://mpb.rks-gov.net/Uploads/Documents/Pdf/AL/2700/Strategjia%20e%20Kosov%C3%ABs%20p%C3%ABr%20Qe	1. Government of Kosovo (GoK) 2. Ministry of Internal Affairs (MIA)	Government of Kosovo - plays an important role in providing political and financial support for implementing the strategy and monitors the progress of the measures undertaken.

	verisje%20Elektro nike%202023- 2027.pdf	3. Ministry of Innovation, Entrepreneurship and Trade (MIET) 4. Agency of Information Society 5. Ministry of Finance 7. Cyber Security Agency	Ministry of Internal Affairs – coordinates and implements the e-government strategy and prepares policies and guidelines for the digitalization of public services. Ministry of Innovation, Entrepreneurship and Trade – promotes the use of new technologies and innovation in the public sector and supports the development of technological capacities and digitalization in the economy. Agency of Information Society – provides technological infrastructure for e-governance, manages and maintains e-governance systems, and ensures data protection on electronic platforms. Ministry of Finance, Labour and Transfers – provides financial resources for implementing the strategy and monitors their effective use. Cyber Security Agency – ensures the protection, coordination, and resilience of the country’s cyber space.
Cyber Security Strategy 2023–2027	https://mpb.rks.gov.net/Uploads/Documents/Pdf/AL/2692/Strategija%20p%C3%ABr%20Siguri%20Kibernetike%20-%20ALB..pdf	1. Cyber Security Agency 2. Ministry of Internal Affairs (MIA) 3. Other ministries: MFLT, ME, MESPI, MH, MIET	Cyber Security Agency – is responsible for managing and coordinating cybersecurity measures at the state level. Ministry of Internal Affairs – is responsible for drafting and coordinating implementation. Other ministries – are responsible for identifying critical information

		4. Agency of Information Society	infrastructures and essential service operators in the areas they cover. Agency of Information Society – provides technological infrastructure for e-governance, manages and maintains e-governance systems, and ensures data protection on electronic platforms.
National Development Plan (NDP) 2025–2027	https://kryemini.stri.rks-gov.net/wp-content/uploads/2025/02/Plani-Kombetar-per-Zvillim-2025-2027.pdf	All Kosovo institutions	Government of Kosovo – responsible for overall supervision of the implementation of the NDP, ensures inter-institutional coordination and monitors implementation. National Council for Economic Development – an institution within the Office of the Prime Minister that coordinates the implementation of the National Plan. Ministry of Finance, Labour and Transfers – provides financial resources and manages the budget for development projects and activities. Sectoral ministries and institutions – responsible for implementing the actions specified in the National Development Plan in their sectors (education, health, infrastructure, economy, etc.) and report on implementation progress. Municipalities and local authorities – implement development activities at the local level in accordance with the objectives of the National Plan and cooperate with central institutions on project implementation.

			Agency for Regional Development and other supporting institutions – coordinate and implement regional and local projects and provide technical assistance for monitoring implementation in the field.
Law No. 08/L-022 on Electronic Identification and Trust Services in Electronic Transactions	https://gzk.rks-gov.net/ActDetails.aspx?ActID=51618	1. Ministry of Economy (ME), 2. Civil Registration Agency (CRA), 3. Kosovo Business Registration Agency (KBRA), 4. Kosovo Accreditation Directorate (KAD) 5. 6. Cyber Security Agency (CSA) 6. Agency of Information Society (AIS) 7. Public and private trust service providers (TSPs)	Ministry of Economy – as the legislator of this law, is responsible for licensing, supervising and monitoring trust service providers. Civil Registration Agency within MIA – creates electronic identities for citizens. Kosovo Business Registration Agency – carries out the registration of businesses via the e-Kosova electronic platform. This process includes application, approval and issuance of electronic certificates for the use of electronic seals by businesses. Accreditation Directorate – conducts the accreditation of trust service providers. Cyber Security Agency – oversees the security measures of the critical infrastructure for electronic identification and trust services. Agency of Information Society – integrates the electronic identification system through the e-Kosova platform. Public and private trust service providers – implement the legal criteria for providing electronic services.

Regulation No. 03/2022 on Trust Mark for Qualified Trust Services	https://gzk.rks.gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME); 2. Trust Service Providers	Ministry of Economy – defines the form, content, dimensions and design of the trust mark for qualified trust services. Trust Service Providers – apply the trust mark to identify qualified trust services.
Regulation No. 04/2022 on Electronic Identification Schemes for Certain Security Levels	https://gzk.rks.gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers	Ministry of Economy – ensures the implementation of standards and cooperates with electronic identification service providers for the legal and technical harmonization of electronic identification schemes. Trust Service Providers - implement electronic identification schemes
Regulation No. 05/2022 on Register of Electronic Identification and Electronic Identification Schemes Service Providers: application method, documentation, publication	https://gzk.rks.gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers	Ministry of Economy – manages, supervises and updates the register of electronic identification service providers and administers the application process. Trust Service Providers – meet the technical and administrative criteria for registration.
Regulation No. 06/2022 on Devices for the Creation of the Qualified or Electronic Signature	https://gzk.rks.gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers	Ministry of Economy – creates the list of qualified devices and verifies their compatibility for use by trust service providers. Trust service providers – are users of devices for creating qualified electronic signatures and seals

Regulation No. 07/2022 on Qualified Electronic Signatures and Stamps, Qualified Electronic Time Stamps and Determination of Their Validity	https://gzk.rks-gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers	Ministry of Economy – defines the conditions for validity, supervises compliance with EU (eIDAS) standards, and implements and publishes the list of valid services. Trust Service Providers – develop and maintain the technology required to meet legal and technical requirements.
Regulation No. 08/2022 on the Procedures for Suspension, Revocation and Protection of Certificates as well as the Prices of Certification Services	https://gzk.rks-gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers (TSP)	Ministry of Economy – defines the conditions for the suspension, revocation and retention of qualified electronic certificates. Trust service providers – implement the established standards for qualified electronic certificates used for electronic signatures, electronic seals and website authentication.
Regulation No. 09/2022 on Criteria for Application and Registration of the Qualified Trust Service Providers	https://gzk.rks-gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers (TSP)	Ministry of Economy – defines the form and method for publishing the list of qualified trust service providers and qualified trust services provided by these service providers. Trust service providers – comply with the technical and legal criteria to be registered as qualified trust service providers.
Regulation No. 10/2022 on Conformity Assessment of Qualified Trust Service Providers Including Risk	https://gzk.rks-gov.net/ActDetail.aspx?ActID=51618	1. Ministry of Economy (ME) 4. Kosovo Accreditation Directorate (KAD)	Ministry of Economy – defines the conformity procedures for qualified trust service providers and qualified trust services, as well as the assessment of damages caused by the provision of qualified trust services.

Management and Compensation			Kosovo Accreditation Directorate – assesses the conformity of qualified trust service providers and qualified trust services, based on the procedures defined by the Ministry of Economy.
Regulation No. 11/2022 on the Presentation, Authentication, Transmission, Storage and Protection of Electronic Documents	https://gzk.rks-gov.net/ActDetails.aspx?ActID=51618	1. Ministry of Economy (ME) 2. All public and private institutions	Ministry of Economy – defines the method of creation, content, and formats used for electronic documents. All public and private institutions – apply the technical and legal criteria for the creation, classification, transfer, management, and use of electronic documents.
Regulation No. 12/2022 on Content and Manner of Maintaining the Register of Qualified Electronic Signature or Seal Creation Devices	https://gzk.rks-gov.net/ActDetails.aspx?ActID=51618	1. Ministry of Economy (ME) 2. Trust Service Providers (TSP)	Ministry of Economy – defines the method for maintaining the register of devices used for creating qualified electronic signatures or seals. Trust service providers – use only the devices listed in the Register.

Based on the analysis of the existing legal and institutional framework for electronic identification and trust services, it has been confirmed that the lack of harmonization with the eIDAS 2.0 Regulation constitutes the fundamental problem preventing the development of a modern and interoperable electronic identity system. This problem arises from the lack of an updated legal basis that would regulate the new standards, concepts and technologies introduced by eIDAS 2.0, as well as the lack of technical and legal interoperability with EU systems. As a result, this creates direct and long-term effects, including the lack of international recognition of the national electronic identity, the inability to develop and implement the European Digital Identity Wallet (EUDI Wallet), increased administrative burden, and serious barriers to the country's digital integration into the European area.

These cause-and-effect relationships are presented in a structured manner in Table 4.

Table 4: Problem tree, illustrating the key problem, its causes and effects.

Impacts	1. Lack of international recognition of electronic identity.
	2. Creation of barriers to the country's digital integration into the European area.
	3. Lack of alignment with European standards for building a unified electronic identity system in accordance with the eIDAS 2.0 Regulation.
	4. Failure to include new eIDAS 2.0 concepts, such as the European Digital Identity Wallet (EUDI Wallet) and high-level secure access.
	5. Increased administrative burden in the provision of public services due to the lack of electronic authentication and the use of electronic signatures by citizens and businesses.
Key problem	The current legislation is not aligned with the eIDAS 2.0 Regulation.
Causes	1. Outdated legal framework that does not include modern eIDAS 2.0 standards and technologies.
	2. Lack of technical and legal interoperability with European Union systems.
	3. Inability to establish a digital identity wallet under the existing legislation.
	4. Complicated, partly manual, and non-digital procedures for certifying trust services.

The causes, effects, or their combination impact multiple stakeholders. The table below identifies the stakeholders and provides information on their responsibilities related to the respective causes and effects, while Chapter 5 provides detailed information on how these stakeholders are consulted.

Table 5: Stakeholder overview based on problem definition

Name of stakeholder	The cause/s related to the stakeholder	The effect/s related to the stakeholder	The manner in which the party is related to this cause(s) or impact(s)
Ministry of Digitalization and Public Administration	The Ministry of Digitalization and Public Administration is responsible for aligning existing legislation with the eliminated eIDAS 2.0 Regulation, implementing the digital identity wallet, and removing technical and legal barriers that hinder cross-border interoperability.	The Ministry of Digitalization and Public Administration addresses the effects of non-harmonization of existing legislation with the European standards for building a unified electronic identity system in line with eIDAS 2.0 Regulation.	The Ministry of Digitalization and Public Administration is responsible for creating an updated legal framework for electronic identification and trust services, ensuring high standards for electronic identity regulation. It is also responsible for establishing the digital identity wallet and incorporating new trusted services into national legislation.
Civil Registration Agency (CRA)	CRA is related to the third cause because, as an electronic identification service provider, it may face challenges in using the digital identity wallet during the implementation of electronic identity creation procedures. CRA is also related to the fourth cause, as complicated, partially manual and not fully digitalized procedures for electronic identification of citizens can create additional obstacles during the implementation of procedures for the creation and use of electronic identification	CRA is related to the third effect, the lack of harmonization with European standards, which impacts citizen electronic identification. Additionally, it relates to increased administrative burden due to the absence of electronic authentication and limited use of electronic signatures by citizens and businesses.	As a provider of electronic identity creation services, ARC is directly affected by obstacles arising from a non-functioning electronic identification system, in accordance with eIDAS 2.0 standards, which create obstacles such as: delays in electronic identity creation procedures, loss of citizen trust and increased administrative burden.

	through the digital identity wallet.		
Kosovo Accreditation Directorate (KAD)	The activity of KAD is related to the first cause, which affects the exercise of its competencies in accrediting trust service providers. This situation results from the lack of a clear definition of KAD's duties and responsibilities in relation to the implementation of the provisions of eIDAS 2.0, creating legal and institutional uncertainty.	KAD's activity is related to the accreditation of trust service providers, which is considered a precondition for eliminating the consequences that may arise from the third effect.	As the authority responsible for accrediting trust service providers, KAD will be responsible for removing administrative burdens related to the accreditation of TSPs.
Kosovo Business Registration Agency (KBRA)	KBRA is responsible for creating electronic identities for businesses, which is related to the third cause – obstacles in the use of the digital identity wallet for applying the electronic seal during the business registration process.	The activity of KBRA is related to effect 4 – the non-inclusion of the digital identity wallet for electronic sealing during the business registration process.	As the authority responsible for eliminating administrative barriers in the business registration process, KBRA aims to ensure the provision of services such as the use of the electronic seal in the fastest and most secure manner possible.
Trust Service Providers (TSP)	TSPs are directly related to the first cause, which prevents the provision of services regulated by eIDAS 2.0.	They are also affected by the consequences that may arise from effects 1, 2, 3, and 4 in carrying out their activity in providing trust services.	TSPs risk non-compliance of their services with European requirements, negatively affecting the reliability and functioning of electronic identification systems and trust services in the country.
Trust service providers	Users of trust services are related to causes 1 and 2, which create legal uncertainty for citizens in	Service users are also affected by the consequences resulting from	Service users are related to causes produced by effects 1, 2 and 3 – which limit access to cross-

	using electronic identification services and reduce trust, negatively affecting the use of the benefits brought by the digitalization process, such as the protection of citizens' and businesses' data for secure interaction with cross-border services.	effects 1, 2, and 3, which limit access to cross-border services, create barriers to digital integration, and expose them to cyberattacks and the loss of personal data.	border services and create barriers to digital integration as well as exposing them to cyberattacks and loss of personal data. Their role in this process is active, as they use electronic identification to carry out various online transactions securely and reliably, and to access public and private services electronically. Businesses, on the other hand, are important users of trust services provided by KBRA and TSPs, including the use of the electronic seal to conduct transactions efficiently and securely. This will contribute to increased transparency, improved efficiency, and their integration into international markets.
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Chapter 2

Objectives

This Concept Document aims to transpose the eIDAS 2.0 Regulation into the legal framework of Kosovo and to improve the existing legal framework for electronic identification and trust services.

This objective is intended to be achieved through the harmonization of the legal framework with the European Union Acquis in the area of digitalization, creating a basis for the development of an innovative economy and ensuring alignment with relevant policy documents, laws, and subordinate acts, which are listed in the table below.

The objectives outlined in this Concept Document are fully aligned with the priorities and strategic directions of the national policies of the Government of the Republic of Kosovo in the area of digital transformation, European integration, and sustainable development. These objectives are aligned with and supported by several key national strategic documents, including: the National Development Plan 2025–2027 (NDP), the Digital Agenda of Kosovo 2030, the Kosovo e-Government Strategy 2023–2027, the Public Administration Reform Strategy 2022–2027, and the National Cybersecurity Strategy 2023–2027, etc.

The drafting and adoption of this Concept Document are linked re related to providing conditions for the digitalization of public services, enabling the digital transformation of businesses, and delivering inclusive digital services that are actively used by users.

In support of these documents and through this Concept Document for the transposition of the eIDAS 2.0 Regulation into the legislation of the Republic of Kosovo, several key objectives are targeted, relating to legal alignment, technological development, and the digital integration of the country, as follows:

- Establishing a harmonized legal and institutional framework in line with European Union standards and the eIDAS 2.0 Regulation – providing legal certainty, transparency and cross-border interoperability in the delivery of electronic identification and trust services;
- The development of the national infrastructure for electronic identification, trust services, and Kosovo’s digital identity wallet – ensuring the implementation of advanced technological security mechanisms, enabling the secure use of electronic identification in the public and private sectors, and protecting personal data;
- The advancement of digital transformation and Kosovo’s integration into the digital market – through the modernization of public administration, facilitating citizen and business access to electronic services, and promoting the development of the digital economy and innovation.

The table below presents the strategic and specific objectives of the relevant government documents on which the drafting of this Concept Document is based.

Table 6: Relevant Government objectives

Relevant objectives	Name of relevant planning document (source)
1. Development of high-quality broadband electronic communication networks; 2. Digitalization of public services; 3. Digital transformation of businesses; 4. Development of user-focused, inclusive public digital services actively used by citizens and the business community. Specific objectives include: 1. Aligning national legislation with eIDAS 2.0 Regulation; 2. Digitalizing public administration through establishing a legal basis for electronic identity and trust services; 3. Supporting the development of the ICT sector and digital innovation; 4. Creating prerequisites for providing secure digital services in the public and private sectors; 5. Enhancement of active uptake of public digital services by citizens and businesses.	1. National Development 1 (NDP) 2026-2028 2-3. Digital Agenda of Kosovo 2030 4. Kosovo e-Government Strategy 2023-2027 2-3. Public Administration Reform Strategy 2022-2027 4-5 Digital Agenda of Kosovo 2030

Experience from other countries in the use of e-ID and the digital identity wallet

Case of Belgium¹

Belgium demonstrates a very high level of e-Government and e-ID usage, well above the EU average. According to statistics, the country has invested around €391.2 million in digitalization and provides universal access to e-ID notified under eIDAS through six different schemes. The *itsme* scheme is used by approximately 90% of the active population. Although Belgium does not yet have e-ID schemes for legal entities, it has taken important steps towards implementing eIDAS 2.0 through the *MyGov.be* digital wallet and actively participates in European pilot projects (POTENTIAL, EWC, DC4EU). Public service digitalization for citizens and businesses is at a high level, generally above the EU average, with notable improvements in accessibility and reductions of administrative burden.

Case of Austria²

Austria has implemented the national digital identity *ID Austria*, fully notified under eIDAS, achieving the Digital Decade 2030 goal with 100% of the population having access to e-ID. However, e-Government usage has only slightly increased, indicating the need for additional incentive measures. The digital identity wallet under eIDAS 2.0 is still in the preparatory stage. In the business services sector, Austria has advanced in e-invoicing, but the absence of a National Peppol Authority remains a challenge. A key focus of public policy is digital health. The adoption of the National e-Health Strategy in 2024, supported by approximately €51 million per year, has significantly improved citizens' access to health data and the interoperability of the ELGA system (Electronic Health Record).

Case of Albania

Albania has made significant progress in e-Government over the past decade, positioning itself among the most advanced countries in the Western Balkans in the digitalization of public services. The e-Albania platform is the key pillar of this transformation, providing a wide range of digital services for citizens and businesses, significantly reducing

¹ [imfname_11487689.pdf](#)

² [imfname_11487689.pdf](#)

physical contact with the administration and administrative burden. Electronic identification is carried out through the national e-ID and authentication mechanisms integrated into e-Albania, which are widely used in online public services.

Although Albania is not an EU member state and does not formally implement the eIDAS framework, the legal and institutional framework has gradually aligned with European standards, laying the groundwork for future interoperability. Currently, there is no full digital identity wallet as defined by eIDAS 2.0, but similar functionalities (digital storage and use of documents and certificates) are integrated into the national platform. Positive aspects include high usage of digital services, centralized service delivery, and increased administrative transparency, while challenges relate to cross-border recognition of electronic identity, advanced data protection, and full alignment with eIDAS 2.0 requirements in the future.

Chapter 3

Options

Law 08/L-022 on Electronic Identification and Trust Services in Electronic transactions was adopted to establish a legal framework in Kosovo for electronic identification and trust services and to harmonize local practices with international standards. Since the law entered into force, digital technologies have advanced rapidly, leading to widespread use of mobile applications, cloud services, the Internet of Things (IoT), and various digital platforms, along with increased demands for higher levels of data protection and user privacy.

However, the lack of updates to the legal framework in line with technological developments and the eIDAS 2.0 Regulation has created regulatory gaps that may jeopardize the security and reliability of trust services and limit cross-border interoperability.

To address these gaps, three options will be considered, all aimed at improving the legal framework for electronic identification, trust services, and the digital identity wallet. Through this process, a flexible legal and regulatory infrastructure responsive to technological changes is planned, which will enhance the security and reliability of electronic services and enable regional and international interoperability.

As part of this process, the main options for implementing legislative changes to create an infrastructure enabling sustainable improvements in electronic identification and trust services in Kosovo have been analyzed.

3.1 Option 1: No changes

If no amendments are made to Law No. 08/L-022 on Electronic Identification and Trust Services in Electronic Transactions, the operation and use of the digital identity wallet and new trust services cannot be clearly regulated. Excluding these elements from the existing legal framework will directly affect the functioning of the electronic identification system, which is already being used by the CRA to create citizens' electronic identities.

Failure to update the law in line with the eIDAS 2.0 Regulation increases the risk of non-recognition of certificates, signatures, and trust services, creating obstacles to cross-border interoperability and access to the EU digital market. Additionally, the failure to apply new technical standards would expose institutions and users to cyber risks, reducing legal and technical security in the provision of public and private services.

Without a harmonized legal framework, trust service providers will lack certainty to invest in new technologies, and users will have limited access to secure services such as electronic identification and electronic signatures. As a result, public administration and the private sector will be limited in providing legally recognized and secure transactions. Regarding administrative burden, this option temporarily maintains existing procedures and avoids an increase in administrative burden in the short term, as institutions and service providers will not face additional requirements for legal adaptation, new certification, or immediate investment in technological systems. This can be considered a short-term positive impact, particularly for institutions with limited administrative and financial capacities.

Although this option provides an initial advantage by avoiding short-term costs associated with legal amendments, it leaves regulatory gaps that will create a disadvantageous position for public and private institutions and limit users' choice of diverse services, which is considered a barrier to the development of a digital economy.

3.2 Option 2: Enhancing the application and enforcement of the existing legal framework

This option seeks to strengthen the application and execution of the current legal framework governing electronic identification and trust services in electronic transactions through limited interventions, without introducing substantial amendments to the existing legislation. The objective is to optimize the operation of the existing system in accordance with the requirements of the new eIDAS 2.0 Regulation while preserving the current legal structure.

Nevertheless, achieving effective implementation and enforcement under the existing legal framework in line with eIDAS 2.0, without substantive changes, is regarded as a

complex undertaking that may result in deviations from European standards for establishing a unified electronic identification system.

A significant concern is the non-inclusion of emerging concepts, including: The digital identity wallet, electronic archiving, electronic registers, electronic attestation of attributes, and the management of remote electronic signature creation devices.

Any option aimed at improving implementation and enforcement of the current legal framework must address these elements.

Enhancing implementation and enforcement is difficult without harmonizing the legal framework with the provisions of eIDAS 2.0, which requires significant amendments to the existing law and implementing regulations, including the addition of new articles defining the most advanced concepts and technologies in electronic identification.

However, this option may create practical challenges in implementation due to the absence of a clear and updated legal structure, which could lead to conflicts and ambiguities in interpretation by institutions and operators. The current law is not flexible enough to accommodate technological changes, innovation, service security challenges, and the need for stronger user protection.

Despite implementation challenges, this option offers the following advantages:

- It allows for quicker implementation by circumventing complex legislative amendments that demand considerable time and resources. Operational enhancements to the existing system can be realized more rapidly in the short term.
- Initial costs are lower, as the approach avoids substantial legal and institutional amendments, thereby reducing financial and administrative burdens.
- It facilitates testing and phased implementation, serving as a transitional stage for piloting certain new elements on a limited scale prior to undertaking comprehensive legal infrastructure reforms.
- It mitigates institutional resistance due to the non-substantial nature of the changes, rendering the option more acceptable in the short term.

Option 2 is expected to have a positive impact on reducing the administrative burden in the short term, but it does not provide a structural and sustainable reduction, and in the long term it may lead to an increase due to parallel procedures, ambiguities in implementation, and the lack of full alignment with the eIDAS 2.0 Regulation.

The practical implementation of this option will be accompanied by long-term challenges and limitations such as:

- The risk of non-compliance with European standards due to the failure to address advanced concepts and mechanisms such as the European Digital Identity Wallet (EUDI Wallet), electronic archiving and registers, electronic attestation of attributes, and the management of remote electronic signature devices – key elements of eIDAS 2.0;
- The creation of ambiguities in interpretation and implementation by institutions and operators, as a result of the absence of a clear and updated legal structure;
- Failure to keep pace with technological developments, security challenges and new user protection requirements, due to the insufficient flexibility of the current law;
- The risk of stagnation and long-term uncertainty if substantial changes are postponed, leading to a lack of adaptation to new concepts and technologies.

Despite offering a faster and less costly solution in the short term, this option does not guarantee full and sustainable implementation of European standards in the long term, and would require further substantial legal and technological amendments to achieve alignment with eIDAS 2.0.

3.3 Option 3: New legal framework

Taking into account the strategic orientation of the Republic of Kosovo toward aligning its legislation with that of the European Union, one of the options that may be considered within the framework of digital reforms is the transposition of the eIDAS 2.0 Regulation. This option aims to raise regulatory standards and fulfill the obligations arising from the process of alignment with the *acquis communautaire*, as part of the country's aspiration for EU integration.

Within this option, the drafting of a new Law on Electronic Identification, Electronic Trust Services and the Digital Identity Wallet is envisaged, with the purpose of ensuring full alignment with the new eIDAS 2.0 Regulation.

The establishment of a new legal framework under this option is intended to:

- Create a robust and contemporary legal foundation by harmonizing the existing legislation with the new eIDAS 2.0 Regulation;
- Ensure the necessary conditions for cross-border interoperability and secure authentication of citizens and businesses;
- Promote the uptake of electronic services that meet high standards of security and trustworthiness;
- Guarantee secure and equal access for all users, including persons with disabilities;

- Foster innovation and technological advancement in the area of electronic identification.

This option is envisaged to deliver the following benefits:

- Establish a harmonized standard for electronic identification and electronic trust services, recognized across EU Member States;
- Remove technical and administrative obstacles to the cross-border use of electronic services;
- Enhance security and protection against digital fraud and cyberattacks;
- Simplify administrative procedures, saving time and resources for citizens, businesses and institutions;
- Ensure legal and technical protection for users, including the safeguarding of their privacy and rights.

In the medium and long term, Option 3 is expected to have a direct positive impact on reducing the administrative burden for citizens, businesses and public institutions. The operationalization of a unified system for electronic identification, electronic signatures and electronic trust services will enable the elimination of repeated identity verification procedures, the reduction of physical documentation and the avoidance of in-person visits to service counters. As a result, administrative processes will become simpler, faster and more transparent, reducing the time and costs required for users of public services to fulfill their administrative obligations.

At the institutional level, the implementation of this option will contribute to the reorganization and automation of internal administrative processes, decreasing the need for manual processing, multiple verifications and the physical exchange of documents between institutions. Furthermore, creating the conditions for cross-border interoperability and mutual recognition of electronic trust services is expected to have a positive impact on reducing the administrative burden, including procedures of an international nature, particularly for businesses. This development will help avoid additional verification requirements and the physical exchange of documents, facilitating the completion of administrative procedures and reducing the time and costs associated with fulfilling administrative obligations.

The main issues to be regulated by the new law include:

- The digital identity wallet, the electronic identification system, electronic signatures and other electronic trust services;
- The conditions for the recognition and cross-border interoperability of electronic trust services;
- Mechanisms for the protection of personal data and user security;

- Principles and rules supporting the development of new technologies and innovation in the area of electronic identity;
- The protection of the rights of citizens and businesses when using electronic trust services;
- Measures to facilitate cross-border cooperation and the mutual recognition of trust services.

The updating and regulation of new and existing services, including the definition of new concepts, is essential for:

- Improving security and legal certainty in the use of trust services and electronic documents, in line with the most advanced standards and technologies;
- Creating conditions for interoperability and mutual recognition of electronic services with EU Member States, through harmonization and the removal of technical and administrative barriers;
- Promoting the wider use of electronic services, innovation and the adoption of new technologies such as artificial intelligence, biometrics and blockchain, by establishing a supportive legal framework;
- Ensuring alignment with technological developments relating to the verification and provision of trust services, in order to guarantee secure and efficient use;
- Enhancing user security and protection through automatic reporting mechanisms and continuous monitoring.

The option of transposing the eIDAS 2.0 Regulation into the national legal framework will enable a comprehensive legal reform, which includes:

- Updating the existing legislation on electronic identification and trust services;
- Expanding the scope of regulation to include new services and functionalities;
- Clearly defining new concepts in line with technological developments; and

This option is considered important because it does not merely aim to improve the current situation, but to establish a new, harmonized and sustainable legal framework, laying the foundations for a functional, secure and internationally recognized electronic identity, in line with Kosovo's ambitions for EU integration and digital transformation.

Furthermore, this option is expected to provide a long-term solution for improving the electronic identification system, the provision of trust services and the operationalization of the digital identity wallet, by addressing:

- Alignment with European standards for the mutual recognition of electronic identification and electronic trust services;
- Modernization of the legal framework and integration of advanced technologies;
- Strengthening security and trust in electronic transactions;

- Facilitating cross-border cooperation and electronic trade;
- Improving the functioning of institutions responsible for electronic services.

Chapter 4

Identification and assessment of future impacts

The table below outlines the key impacts identified in relation to Option 1, which provides for the retention of the existing legal framework; Option 2, which seeks to enhance the implementation of the current legal framework; and Option 3, which envisages the drafting of a new Law on Electronic Identification, Trust Services and the Digital Identity Wallet.

Table 7: The most significant impacts identified under the impact category

Impact categories	Relevant impacts identified
Economic impacts	Option 1 generates predominantly short-term positive impacts, as it avoids immediate financial costs for public institutions and businesses and does not require additional investments in infrastructure or regulatory adjustments, while maintaining the existing administrative burden at its current level. Nevertheless, this option entails pronounced medium- and long-term negative impacts, as it constrains the development of the digital market, undermines business competitiveness, and limits opportunities for cross-border e-commerce and foreign direct investment. Furthermore, the continuation of existing administrative processes hinders gains in efficiency and the reduction of administrative costs. Option 2 yields positive impacts by enhancing the efficiency of digital services, gradually lowering operational and administrative costs for businesses and public institutions, and streamlining existing procedures. On the other hand, its negative impacts stem from the limited benefits associated with partial harmonization with eIDAS 2.0, leading to delays in the realization of full economic gains, particularly in the areas of cross-border e-commerce and the attraction of foreign investment, while maintaining a relatively elevated administrative burden in the medium term. Option 3 produces positive impacts in the medium and long term by strengthening economic competitiveness, reducing the costs of electronic transactions, facilitating business access to the European market, and advancing the simplification and digitalization of administrative

	procedures. The negative impacts of this option primarily concern a temporary rise in administrative burden and the upfront transition costs for public institutions and businesses. Nevertheless, these costs are expected to decline substantially and be outweighed by the sustainable economic benefits realized over the long term.
Social impacts	Option 1 generates limited positive effects, as it preserves the current mode of service delivery and avoids immediate changes for citizens, while maintaining existing practices of interaction with public institutions. Nevertheless, this option entails medium- and long-term negative social impacts, as it restricts equal and secure access to public and private services, particularly for marginalized groups and citizens in remote areas, and slows the transformation of social relations and the enhancement of quality of life through digitalization. Option 2 produces positive outcomes by gradually increasing access to and trust in digital services, facilitating citizen engagement with public institutions and selected private services, and contributing to time savings and greater efficiency in performing daily activities. On the other hand, its negative effects are associated with uneven social benefits, since partial harmonization does not guarantee comprehensive and uniform access for all citizens, thereby maintaining disparities in digital inclusion and civic participation. Option 3 delivers positive impacts over the medium and long term by enabling easier, safer, and more equitable access to public and private services, regardless of an individual's location or social circumstances. This option directly enhances quality of life, saves time, fosters greater civic participation, and encourages new forms of communication, collaboration, and social interaction, while negative impacts are mainly limited to temporary challenges related to digital adaptation for certain population groups.
Environmental impacts	Option 1 produces limited positive effects, as it does not require immediate changes in institutional or business operations and avoids additional infrastructure interventions. Nonetheless, it entails medium- and long-term negative environmental impacts, as it perpetuates high reliance on physical documentation, administrative travel, and resource consumption, contributing to increased carbon emissions and slowing progress toward sustainable practices. Option 2 generates positive outcomes by gradually increasing the adoption of digital services, thereby partially reducing reliance on paper documents, physical movement, and labor-intensive administrative processes. However, negative effects persist due to the absence of a

	comprehensive approach, limiting environmental benefits and resulting in uneven outcomes across sectors and services. Option 3 delivers positive impacts in the medium and long term through the full digitalization of administrative processes and electronic transactions. This approach directly reduces paper use, curtails physical travel, and lowers carbon emissions, while negative impacts primarily concern temporary increases in energy consumption for digital infrastructure, which are expected to be mitigated through the deployment of efficient and sustainable technological solutions.
Impacts on fundamental rights	Option 1 yields limited positive effects on fundamental rights, as it does not introduce immediate changes to the protection of existing rights and preserves the current level of legal certainty. Nonetheless, it entails medium- and long-term negative effects, as it inadequately addresses challenges related to personal data protection, privacy, and equitable access to digital services, potentially hindering the effective exercise of these rights for all citizens. Option 2 generates positive impacts on fundamental rights by reinforcing security practices, enhancing trust in digital services, and improving personal data protection within the existing regulatory framework. On the other hand, negative effects stem from the fact that partial harmonization does not guarantee comprehensive and uniform protection of fundamental rights, particularly regarding privacy, transparency, and citizens' control over their personal data. Option 3 delivers significant positive impacts on fundamental rights by establishing a framework aligned with European standards for privacy, personal data protection, and legal security. This option promotes equal access to services, strengthens transparency, and enhances individual control over digital identity and personal data, while negative impacts are mainly limited to transitional risks during implementation, necessitating additional protective measures and awareness-raising to prevent infringements of fundamental rights.
Gender impact	Option 1 has mainly neutral short-term impacts, as it does not change current access for women and men to digital services and maintains the existing status quo. However, in the medium and long term, this option may create challenges in accessing digital services, especially for women in rural areas or marginalized groups, limiting the benefits of digitalization. Option 2 brings positive impacts by gradually increasing access to and use of digital services by both genders, and improving interaction with public institutions. However, negative impacts arise because gradual

	improvements do not fully address structural and digital barriers, making the benefits limited and uneven. Option 3 has medium- and long-term positive impacts by enabling more equal and inclusive access to public and private digital services. This option helps reduce gender inequalities by facilitating access for women, including those with caregiving responsibilities or limited mobility, while negative impacts mainly concern the need for accompanying measures to prevent digital exclusion of women with lower digital skills.
Social equality impacts	Option 1 has limited positive impacts, as it maintains existing access to services and avoids immediate changes that could create uncertainty for citizens. However, it has medium- and long-term negative impacts, as it does not address inequalities in access to digital services and electronic transactions, particularly for marginalized groups. Option 2 produces positive impacts by improving access to and trust in digital services, facilitating participation in public and private activities for some social groups. Nevertheless, negative impacts relate to the fact that partial harmonization does not completely remove social and economic barriers that prevent some citizens from fully benefiting from digital services, leaving moderate inequality in social inclusion. Option 3 brings positive impacts in the medium and long term by enabling more equal and comprehensive access to services for all citizen groups, including vulnerable populations. This option contributes to reducing social inequalities, increasing civic participation, and facilitating inclusion for everyone. Negative impacts mainly relate to transitional challenges during the implementation of new systems, which may require additional measures to support vulnerable groups and prevent digital social exclusion.
Youth impacts	Option 1 yields limited effects on youth, as it preserves the stability of existing services and does not immediately disrupt access to digital services. Nevertheless, its medium- and long-term negative effects are significant, as it restricts opportunities for young people to access advanced digital services, engage in innovation, and participate actively in the economy and society, while failing to foster the development of digital skills and creative potential. Option 2 generates positive impacts by gradually expanding access to and use of digital services, as well as improving efficiency in interactions with public institutions and private service providers. Its negative effects are associated with partial benefits, since limited harmonization does not

	guarantee full, inclusive, and innovative access to all services, thereby constraining the complete development of youth digital potential. Option 3 delivers pronounced positive impacts by facilitating easier, safer, and more inclusive access to digital services, enhancing civic engagement, fostering innovation, and promoting the development of digital competencies. This option increases opportunities for participation in the economy, online education, financial services, and professional development. Negative impacts are largely limited to initial adaptation challenges, which may require additional training and targeted support for youth with lower digital skills.
Impacts on administrative burden	Option 1 has limited effects on administrative burden, as it preserves current working methods and manual procedures without necessitating immediate changes or additional staff training. Nonetheless, medium- and long-term negative impacts are notable, since bureaucratic and slow procedures persist, increasing the risk of errors and fraud, while institutions fail to benefit from the efficiencies of automated and trust electronic services. Option 2 delivers positive impacts by gradually reducing administrative workload through the adoption of certain harmonized electronic services and partial automation of processes. This enables institutions to concentrate on delivering higher-quality services and minimizing errors. Negative effects arise from partial benefits, as some administrative procedures remain unharmonized and manual processes continue, generating temporary workload for staff during the adaptation phase. Option 3 provides significant positive impacts by markedly reducing administrative burden via automation of verification, authentication, and electronic document exchange processes. This option enhances efficiency, security and reliability of administrative services, allowing staff to focus on value-added activities for citizens and businesses. Negative impacts are primarily related to initial adaptation challenges, necessitating targeted training, technological investments, and additional support for staff requiring digital skills enhancement.
Impact on SMEs	Option 1 has limited effects on SMEs, as it preserves existing modes of interaction with the administration and does not necessitate immediate changes to their processes. Nonetheless, medium- and long-term negative impacts are evident, as procedures remain slow, bureaucratic, and dependent on physical documentation, increasing operational time and costs for SMEs and constraining their ability to innovate and scale quickly.

	Option 2 delivers positive impacts through the gradual adoption of trust electronic services and partial harmonization of administrative processes, facilitating smoother interaction between SMEs and public institutions. This enhances efficiency and reduces the likelihood of errors. Negative impacts relate to partial benefits, since not all processes are harmonized and some procedures remain bureaucratic, creating additional workload and requiring SMEs to adapt gradually. Option 3 offers positive impacts by enabling rapid, secure, and comprehensive engagement with the administration via trusted electronic services. This option markedly reduces administrative time and costs, strengthens the security, reliability and transparency of processes, and fosters accelerated business growth and innovation. Negative effects are primarily related to the initial adaptation phase, necessitating technological investment and targeted staff training, particularly for SMEs with limited digital literacy.
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4.1 Challenges in data collection

In preparing this Concept Document, reference was made to Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No. 910/2014 as regards establishing the European Digital Identity Framework; the current Law No. 08/L-022 on Electronic Identification and Trust Services in Electronic transactions; and the national regulatory framework concerning electronic identification and trusted services.

Recommendations from EBRD experts provided under the project “Kosovo: MDA – Transposition of eIDAS 2.0 into National Legislation” were also analyzed, emphasizing the need for alignment of Kosovo’s legislation with eIDAS 2.0.

Access to supplementary information from the most recent European and regional practices has been insufficient, which has hindered the ability to ensure that the document fully reflects the latest developments and standards in the field of electronic identification and trust services, given that the practical implementation of eIDAS 2.0 is still at an initial stage.

In drafting this Concept Document, several challenges were identified that have impacted the evaluation of the existing legislation:

- The identification of legal gaps and misalignments with European Union regulations and standards.

- The determination of new concepts introduced by eIDAS 2.0 Regulation that must be incorporated into Kosovo's legislation.
- The identification of obstacles encountered by trust service providers and their users due to resistance from public and private institutions in accepting electronic signatures or electronic seals, despite the legal authorization to provide such services.
- The lack of comprehensive and reliable data and statistics from European and regional countries, which has hindered comparative analysis, impact assessment, and the process of legal harmonization.
- The necessity for continuous updating of information on the latest European and international practices, given the fast-paced and dynamic technological developments in this field.

Chapter 5

Communication and consultation

The drafting of this Concept Document was conducted through a structured process of consultation and inter-institutional cooperation, with the objective of ensuring broad stakeholder engagement and incorporating relevant needs and perspectives. Participants in this process included: the Ministry of Economy, the Ministry of Internal Affairs, the Ministry of Finance, Labour and Transfers, the Ministry of Industry, Entrepreneurship and Trade, the Civil Registration Agency, the Kosovo Accreditation Directorate, the Kosovo Business Registration Agency, the Kosovo Banking Association and the Central Bank of the Republic of Kosovo.

All the aforementioned entities were involved in the working group responsible for drafting the Concept Document. The invitation to join the working group was not responded to by the STIKK Association and the Agency for the Protection of Classified Information.

As part of the working group's activities, several in-person meetings were held. On 13 August 2025, the initial meeting took place, during which the purpose and approach for drafting the Concept Document were presented. On 18 August 2025, the first draft was distributed to the working group members for comments, observations, suggestions, and recommendations. On 10 September 2025, the next working group meeting was held, during which the received comments on the first draft were jointly analyzed. On 4 November 2025, a follow-up meeting took place, during which all comments were reviewed, and the first draft was consolidated into the second version.

Following consolidation, on 20 November 2025, the draft was circulated to confirm whether it fulfills the requirements for submission to preliminary consultation. On 22 December 2025, the Concept Document was submitted for preliminary consultation, in line with the procedures and deadlines established under Article 36 of Regulation (GRK) – No. 17/2024 on the Rules of Procedures of the Government of the Republic of Kosovo.

During the preliminary consultation, comments were received from the Office of Strategic Planning and the Secretariat of the Government of Kosovo.

Table 8: Summary of communication and consultation activities performed for a concept document

On 13 August 2025, a public meeting was held with the Working Group and relevant stakeholders, during which the content and objectives of drafting the Concept Document were presented. On 22.12.2025 – 15.01.2026 – the Concept Document was submitted for preliminary consultation to all institutions. The feedback, suggestions and recommendations received to enhance the quality and implementability of the Concept Document were analyzed and addressed in coordination with the commenting parties. From 26 February 2026 to 19 March 2026, the Concept Document was published on the government platform for public consultation. Comments in the form of recommendations were received from the Agency for Gender Equality, which were of a general nature and not directly related to the specific provisions of the Concept Document. These recommendations were considered useful, particularly for the phase of drafting the law envisaged by this Concept Document.						
Primary objective	Target group	Activity	Communication/notification	Indicative timeline	Necessary budget	Responsible individual
Open meeting for all stakeholders	GCS, ME, MIA, CRA, KBRA, AIS, MIET, MFLT, CBK, KAD, Kosovo Banking Association, STIKK and the Agency for the Protection of Classified Information.	Information regarding the purpose of the Concept Document (CD) transposing Regulation (EU) 2024/1183	The invitation to participate was issued on 08.08.2025 by email	/	/	Ajshe Jashari
Preliminary	All institutions recommended	The draft was sent by email	22.12.2025 – Distribution	22.12.2025 – 15.01.2026	/	Ajshe Jashari

consulta tion	by the Legal Office of the ME.	to all parties recomme nded by the Legal Office of the ME.	of the draft CD via email			
Public consulta tion	All stakeholders	Publicati on of the consultati on on the portal for public consultati on	26 February 2026 – Publication on the government consultation platform. Additionally, all institutions (stakeholders) that had been involved in the preliminary discussions were notified via email.	26.02.2026 - 19.03.2026	/	Ajshe Jashari

Chapter 6

Comparison of options

Option 1: No changes

This option has several short-term advantages, as it requires no legal, financial or organizational amendments, rendering it administratively straightforward to implement while preserving institutional stability in the current period.

Nevertheless, in comparison with other alternatives, this option entails risks due to the explicit limitations of the existing Law No. 08/L-022, which does not incorporate the new concepts introduced by eIDAS 2.0, including the digital identity wallet, electronic archiving and electronic registries.

Moreover, the lack of alignment with the new European framework creates barriers to recognition of trust services by EU member states, thereby limiting cross-border interoperability and legal certainty for both users and service providers.

Option 2: Enhancing the implementation of the existing legal framework

Option 2 envisages enhancing the application of the existing Law No. 08/L-022 without introducing structural changes to the legal framework. This approach may deliver short-term advantages, including swifter implementation of corrective measures and lower initial costs, thereby avoiding the protracted processes associated with full legislative revision. It allows for the gradual testing and implementation of certain elements of the electronic identification system, facilitating institutional adaptation and mitigating resistance to change.

Nevertheless, this approach remains limited when measured against the requirements outlined by eIDAS 2.0.

Option 2 does not fully incorporate the new concepts mandated at the European level, such as the European Digital Identity Wallet (EUDI Wallet), electronic archiving or attribute verification. Consequently, the existing legal framework, even with improved implementation, will remain partially misaligned with EU standards and insufficiently flexible to accommodate rapid technological developments. This may generate legal uncertainty and impede the cross-border recognition of trusted services.

Option 3: Establishing a new legal framework (full transposition of eIDAS 2.0)

Option 3 provides for the establishment of a completely new legal framework that integrates electronic identification, trust services and the digital identity wallet. This

approach seeks full alignment with eIDAS 2.0 and brings Kosovo's legislation in line with the most advanced European standards.

The primary advantage of this option is the establishment of a modern, integrated system that guarantees full cross-border interoperability and recognition of trusted services within the European space. The new legal framework strengthens both legal and technical security for all users and service providers, establishing clear and stable conditions for the functioning of electronic identity. Simultaneously, it allows for the integration of new technologies, including the European Digital Identity Wallet (EUDI Wallet), attribute verification, electronic archiving, and digital registries, facilitating innovation and advanced digital transformation.

The main challenge lies in the complexity of the process: drafting, approving and implementing a new law requires time, specialized expertise, and substantial institutional and technical investment. Adapting existing infrastructure and coordinating across institutions present challenges that must be carefully managed.

An assessment of the options for developing electronic identification, trust services and the digital identity wallet indicates that each option carries its own advantages and drawbacks. Options that maintain the status quo or partially improve the implementation of the existing law offer rapid solutions with lower initial costs but risk isolating the country, limiting the international recognition of trusted services, and creating legal and technological gaps that may compromise security and reliability.

On the other hand, establishing a new legal framework aligned with eIDAS 2.0 provides a sustainable long-term solution. This enables the integration of the digital identity wallet, advanced security standards and trust services, while allowing the adoption of modern technologies. This approach ensures both legal and technological harmonization with EU standards, enhances security and reliability for users and service providers, and establishes a foundation for sustainable digital development and the modernization of public administration.

In conclusion, Option 1, although simpler to implement, is less advantageous than the other alternatives, as it increases technical vulnerabilities, undermines the reliability of electronic services, and does not support the modernization of digital infrastructure. For these reasons, this option is not recommended.

Option 2 offers limited and short-term improvements but does not provide full legal and technological alignment with eIDAS 2.0 Regulation. As such, it constitutes a temporary solution with partial impact and is less favourable in addressing the issues identified. For these reasons, this option is not recommended.

Option 3 represents the most comprehensive and sustainable solution, ensuring full alignment with European Union legislation, enhancing the security and reliability of electronic services, and providing direct support for digital transformation. This option lays a solid foundation for the development of electronic identity in Kosovo and fully addresses existing legal and technological deficiencies.

Accordingly, the most favourable solution is the establishment of a new legal framework (Option 3), as it ensures compliance with European standards and fosters the sustainable development of Kosovo's electronic identity system.

The table below outlines the comparison methods for each option, assessing the respective positive impacts they may generate.

Table 9: Comparison of options

Comparison method Multi-criteria analysis			
Relevant positive impacts	Option 1: No changes	Option 2: Enhancing implementation and execution	Option 3: New Legal Framework - Drafting and adoption of the New Law
Alignment with European Regulation	No impact. On the contrary, it restricts opportunities to adopt modern technologies and services due to misalignment with the advanced standards of eIDAS 2.0 Regulation. This option impedes cross-border interoperability and recognition of trust services at the European level, negatively affecting integration and cooperation with EU member states. It also results in delays in the development of Kosovo's digital economy and increases security risks in electronic services, undermining user confidence and overall system efficiency.	Moderate impact. This option contributes to enhancing the implementation, efficiency, and reliability of existing trust electronic services. It increases security and practical interoperability, partially aligning with eIDAS 2.0 requirements, while providing a foundational basis for integration with EU systems. Nevertheless, it remains limited in fostering innovation and the expansion of new services.	High impact. It allows for automatic recognition of electronic identity at national and international levels, markedly improves security, and broadens the spectrum of trust electronic services. Furthermore, this option encourages innovation, competition, and integration within the European Digital Single Market, strengthening user trust in electronic services.

Expansion of the regulatory framework to include additional services and new actors (e.g., private identity service providers).	No impact. Conversely, it restricts the expansion of the regulatory framework, hindering the participation of new actors and private identity service providers. This situation leads to limited development and innovation opportunities in the area of electronic identity and electronic services, resulting in lower service competitiveness and stagnation in the European Digital Single Market.	Medium impact. It positively affects implementation by enhancing actor diversity and expanding the range of services provided. Additionally, it facilitates closer cooperation between the public and private sectors, improves user offerings, and boosts competition in the digital market. Nevertheless, the integration of new actors within the regulatory framework remains partial and not fully comprehensive.	High impact. It impacts the creation of opportunities for the full and transparent inclusion of private identity service providers and new actors in the digital market. This option supports the development of a flexible, competitive, and innovative ecosystem in the area of electronic identity and trust electronic services, enhances service quality, broadens user access, and strengthens legal security for new actors while increasing user confidence in trust electronic services.
It requires consistent investment in new technologies, including the use of the digital identity wallet and advanced electronic signatures.	No impact. Conversely, it restricts the adoption of modern technologies, limiting the use of the digital identity wallet and advanced electronic signatures. This generates uncertainty for organizations and businesses regarding investments in new technologies, adversely affects the provision of subsidies, and impedes technological development and innovation. Consequently, it increases the risk that both the public and private sectors may fall behind regional countries and the EU in advancing the digital economy.	Moderate impact. This option delivers moderate enhancements in the practical application of the legal and institutional framework and provides more favourable opportunities for investment in new technologies, particularly in the development and deployment of the digital identity wallet and advanced electronic signatures. It also facilitates the integration of these tools into existing electronic services, thereby enhancing their functionality and practical usability. Through targeted investments in technology and the strengthening of institutional and professional capacities, a more sustainable	High impact. This option offers comprehensive, structured and long-term support for substantial investments in advanced technologies, including the development and deployment of the digital identity wallet and advanced electronic signatures. It markedly enhances interoperability, security and reliability of electronic systems, establishing a digital infrastructure aligned with international standards. At the same time, it stimulates domestic and foreign investment in the digital economy, reinforcing the business environment

		foundation for delivering digital services is established. While the scale of investment and capacity development remains relatively limited, gradual improvements in the quality of electronic services, as well as increased trust among citizens and businesses in electronic identification and transactions, are anticipated.	and creating opportunities for sustainable development and continuous innovation. Consequently, the quality, efficiency and accessibility of electronic services for the public sector, private sector and citizens are significantly improved, fostering greater trust in electronic transactions and in the use of electronic identification and signature tools.
Security and user protection are enhanced through the application of strict privacy standards and multi-factor authentication.	No impact Conversely, it may increase exposure to fraud, privacy breaches, and cyberattacks due to insufficient reinforcement of existing security mechanisms. As a result, the protection of personal data and the security of electronic transactions remain inadequate to address emerging digital threats. This could lead to heightened uncertainty and diminished trust among citizens and businesses in the use of trusted electronic services. Furthermore, enhancements to fundamental authentication measures, which are crucial for safeguarding identities and electronic transactions, remain	Moderate impact. This option delivers significant improvements by implementing stricter privacy protection standards and enhancing authentication mechanisms. Consequently, it is expected to reduce the risk of cyberattacks, fraud, and misuse within electronic services. Furthermore, it fosters greater trust among citizens and businesses in the use of trusted electronic services, strengthening the security of transactions and electronic identities. Nevertheless, owing to the partial or phased implementation of measures, challenges and gaps may persist in achieving full compliance with the most advanced eIDAS 2.0 standards, thereby constraining the long-term	High impact. This option envisages the implementation of multi-factor authentication, fully aligned with the requirements of eIDAS 2.0 Regulation and European data protection legislation, including GDPR. It ensures the deployment of the most advanced security technologies, providing maximum protection for both identity and personal data. This approach markedly enhances the resilience of systems against cyberattacks and reduces the risk of fraud and misuse of data. Consequently, it is expected to substantially increase trust among citizens and businesses in trusted electronic services, while consolidating the security

	limited, constraining overall progress in security within the digital ecosystem.	transformative impact of this option.	of transactions and the integrity of electronic identities in accordance with the highest European standards.
Relevant negative impacts			
The lack of consideration for the needs of vulnerable groups (persons with disabilities, the elderly, etc.) in the design of digital identity.	High impact Failing to address the specific requirements of vulnerable groups (persons with disabilities, the elderly, individuals with limited digital skills, etc.) in the design and implementation of digital identity creates significant usage barriers. This option may lead to the direct exclusion of these groups from digital identity services and, by extension, from the public and private services dependent on them. The lack of accessibility standards, appropriate alternatives, and sufficient support substantially heightens the risk of social exclusion. As a result, inequality in access to electronic services is exacerbated, restricting the exercise of rights and full participation of these groups in economic and social life.	Moderate impact This option offers limited opportunities to address the specific needs of these groups, focusing mainly on applying some basic accessibility rules to the digital identity interface. Although partial coverage of certain needs can be ensured (e.g., minimal accessibility features or simplified usage instructions), these measures do not guarantee full inclusion and equal access for all vulnerable categories, such as persons with disabilities, the elderly, or individuals with limited digital skills. Consequently, the risk of social exclusion is mitigated to a certain extent but not entirely eliminated, leaving persistent inequalities in the effective utilization of digital identity and digital services.	Low impact This option provides a comprehensive approach to addressing the specific needs of these groups during the design and implementation phase of digital identity. By applying the principle of universal design and advanced accessibility standards, interfaces are made suitable for maximum inclusion. This contributes to improved access for persons with disabilities, older adults, and other vulnerable groups, significantly reducing the risk of social exclusion. As a result, equality of access is promoted, full participation in digital services is ensured, and the principles of non-discrimination and social inclusion are upheld in the course of digital transformation.

Asymmetric regulation may lead to unequal implementation and failure to achieve regulatory objectives in certain sectors.	High impact This option increases the likelihood of unequal implementation of regulations across different sectors, creating varied standards and practices for electronic identification and services. As a result, regulatory objectives may not be fully achieved due to a lack of coordinated oversight, consolidated supervision, and institutional harmonization. Moreover, there is a risk of fragmentation and division within the internal market, which could hinder the sustainable development of the digital ecosystem and limit effective interaction between institutions, businesses, and users.	Moderate impact This option provides partial improvements that tackle certain cross-sector disparities, thereby partially mitigating the risk of inconsistent regulatory implementation. Nevertheless, the risk is not entirely removed, as inter-sectoral harmonization remains incomplete, and some sectors may continue to operate under different practices and standards. Consequently, the potential to achieve full harmonization and fulfill regulatory objectives is constrained, creating scope for market fragmentation and obstacles to effective interaction among various stakeholders.	Low impact This option delivers comprehensive and symmetrical regulation across all sectors, removing disparities and ensuring uniform enforcement of regulations. Consequently, regulatory objectives can be fully achieved, enhancing the operation of the digital market and strengthening the confidence of diverse stakeholders within the digital system. The approach reduces fragmentation, promotes cross-sectoral interoperability, and establishes a durable foundation for the sustainable development of the digital identity ecosystem.
Potential risks in the utilization of digital services stem from regulatory gaps and insufficient alignment with the pace of technological advancements (e.g., emerging communication technologies).	High impact This option generates substantial gaps in the regulation of electronic trust services, stemming from insufficient alignment with the rapid pace of emerging technologies. Consequently, the risk of cyberattacks and misuse rises due to the lack of adequate legal safeguards. This scenario is likely to undermine user	Moderate impact This option provides partial enhancements by addressing the use of emerging communication technologies and trusted electronic services in certain instances. Nonetheless, key gaps persist due to insufficient alignment with the rapid pace of technological advancement. Consequently, the risk of misuse and cyberattacks is mitigated but remains, given	Low impact This option ensures comprehensive and up-to-date regulation, encompassing the deployment of new communication technologies and trusted electronic services. The legislation dynamically aligns with the pace of technological advancement, addressing critical gaps and providing full legal

	confidence in electronic trust services. Moreover, the lack of regulatory alignment and timely updates will impede the growth of the digital sector and diminish the country's competitive edge both regionally and within the European Union.	the absence of comprehensive legal safeguards. User confidence in trusted electronic services improves only modestly, while the digital sector's development remains fragmented, potentially undermining competition, innovation, and integration into regional and European markets.	protection to users against misuse and cyber threats. Consequently, trust among citizens and businesses in trusted electronic services rises substantially. This approach fosters sustainable development, encourages innovation and competition within the digital sector, and achieves full harmonization with both regional and European markets.
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Efficiency and productivity for businesses, particularly small and medium enterprises, may be reduced due to adaptation costs and uncertainties surrounding implementation.	High impact This option generates considerable legal and technological uncertainty for businesses, particularly small and medium-sized enterprises, in the utilization of electronic trust services. The lack of harmonization and the deployment of incompatible solutions create barriers to innovation and increase adaptation costs for businesses. Inefficient and non-transparent electronic processes adversely affect productivity, constraining operational efficiency. Moreover, there is a risk that small and medium-sized enterprises may be excluded from international markets and lose opportunities for cooperation with companies in countries implementing the new eIDAS standards, thereby diminishing competitiveness and development potential.	Moderate impact This option delivers partial and controlled improvements for businesses via moderate investments in equipment and training, alongside gradual enhancements of existing processes. During the transition period, security remains constrained, potentially causing temporary confusion and delays in daily operations. Implementation advances occur gradually and may be accompanied by manageable slowdowns in operational workflows, reducing efficiency and productivity at specific intervals. Nonetheless, this option enables businesses to adapt in a timely manner and prepare adequately, thereby minimizing negative impacts and strengthening resilience against operational challenges.	Low impact This option entails substantial investments in new systems, training, and compliance with updated requirements for businesses, particularly small and medium-sized enterprises. Implementing these fundamental changes mitigates confusion and uncertainty, though some temporary challenges to process efficiency may arise in the early stages. In the long term, this option delivers tangible benefits for businesses: harmonized standards, simplified access to the digital single market, enhanced reliability and operational efficiency, and opportunities to fully leverage competitiveness and innovation within the digital sector.
Relevant costs	Administrative cost	Administrative cost	Administrative cost
Initial investments in the development of digital infrastructure (national platform, wallet,	Low This option preserves the existing infrastructure and does not entail significant new investments.	Moderate This option provides limited enhancements to current platforms, with partial development of the digital identity wallet and digital certificates.	High This options envisages for substantial investment in digital infrastructure development, encompassing modern national platforms, an advanced digital identity wallet, secure certificate systems, and additional

certificates, etc.).							supporting digital components.		
Implementation requires strengthening institutional capacities and training public administration personnel.	Low Minimal training and development, with no significant changes in institutional capacities. Limited investment in development.			Moderate Training sessions organized for key groups, basic capacity building within the administration to implement new requirements.			High Comprehensive training programs for staff at all levels, development of technical and managerial capacities, preparation for challenges in implementing advanced eIDAS 2.0 standards.		
Costs for awareness campaigns, digital inclusion initiatives, and training for vulnerable groups.	Low - no new activities undertaken.			Moderate - it includes organizing selected activities, producing promotional materials, and providing limited training.			High - it encompasses multiple campaigns, professional training, translations, customized materials, and technical support.		
Costs for businesses adapting to new technical and regulatory requirements.	Low Businesses implement no major changes. Existing systems remain in use. Minimal or no additional costs. Minimal or no additional costs.			Medium Businesses undertake limited technical updates and prepare for certain new requirements. Training and adaptations are limited.			High Substantial initial investments in equipment, software, training, and continuous updates. Long-term benefits, but initial costs are high.		
Assessment of the expected budget impact	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
	None	None	None	Minimal	Minimal	Minimal	Moderate / High	High	High
Conclusion	Maintenance of the existing situation			Undertaking partial reforms in the implementation of the existing legislation			Comprehensive reform of the legal framework, infrastructure, and implementation mechanisms		

6.1 Implementation plans for the various options

Implementation plan for Option 1

Option 1 entails preserving the status quo of the existing electronic identification (eID) system, without introducing new legal or technological measures. The focus is on the technical and operational upkeep of the current infrastructure, including security monitoring, internal audits, and basic staff training for incident response. Public communication will continue through annual reports on eID usage. This option involves low costs and aims to ensure the stability of the existing service, without significant expansion or innovation.

The implementation plan for this option is outlined in the table below.

Table 10. Implementation plan for Option 1

Purpose of the policy	Preserving the current operation of the electronic identification system without significant legal or technological interventions, keeping costs low (limited to technical and operational maintenance).							
Strategic objective	Guarantee the core functions of the existing eID system.							
	Output, activities, year and responsible organization/department/expected cost							
Specific Objective	Output / Activity	Year 1	Year 2	Year 3	Year 4	Year 5	Responsible institution	Expected cost figure
1. Maintenance of the existing eID system	Routine monitoring and maintenance of servers, applications and eID security certificates.	50k €	50k €	50k €	50k €	50k €	MIA/MDAP	Low 200k €
	Basic incident response training	7k €	7k €				MIA/MDPA	Low 14k €

2. Improving communication with users	Annual publications on the use of eID	3k €	3k €	3k €	3k €	3k €	MDPA	Low 15k €
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Implementation plan for Option 2

Option 2 seeks to enhance the functionality of the current electronic identity system by gradually aligning it with European Union standards. This approach entails moderate investments in both technical and institutional capacities. Planned activities include the development of updated administrative guidelines for enforcing the existing law, training for public officials and digital service providers, and testing interinstitutional interoperability via standard APIs. Furthermore, the option incorporates ongoing public awareness campaigns to promote eID usage, representing a balanced approach between cost and medium-term benefits.

The table below outlines the implementation plan for this option.

Table 11. Implementation plan for Option 2

Purpose of the policy	Enhancing the functionality and enforceability of the current legal framework for electronic identity and trust services involves moderate costs (including investments in technical and institutional capacities).							
Strategic objective	Strengthen the effectiveness of the existing electronic identification and trusted services framework through gradual harmonization with European Union standards.							
	Output, activities, year and responsible organization/department/expected cost							
Specific objective	Output / Activity	Year 1	Year 2	Year 3	Year 4	Year 5	Responsible institution	Expected cost figure

1. Improving the implementation of existing law	New administrative instructions on the implementation of the existing law - Digital Identity Wallet	2,50k €	2,50k €				MDAP	Low 5k €
	Capacity-building training for public officials and electronic identity service providers.	15k €	15Kk	15k €			MDAP	Moderate 45k €
2. Institutional interoperability	Testing and standardization of inter-institutional APIs	50k €	50k €	35k €	30k €	25k €	MDAP	Moderate 190k €
Public awareness (Information campaign)	Campaigns and user manuals	25k Euro	20k Euro	15k Euro			MDAP	60k Euro

Implementation plan for Option 3

This option envisages the drafting and adoption of a new Law on Electronic Identification, Trust Services and the Digital Identity Wallet, which will replace the existing law to achieve full alignment with eIDAS 2.0. Compliance analysis conducted by EBRD experts indicates that amending the current law would require extensive interventions, including:

- Addition of 23 new definitions;
- Amendment of 35 existing articles;
- Addition of 25 new articles within existing chapters; and
- Addition of 39 articles across six new chapters.

Given that these changes would affect over 40% of the existing law, the complexity and potential implementation ambiguities make drafting a new law the most suitable, sustainable and efficient solution for achieving full alignment with eIDAS 2.0.

The new law will address technological advances, expand the scope of trusted electronic services, and integrate new technologies. It will remove existing technical and administrative barriers, facilitating Kosovo's integration into the European digital market. This will foster a favourable environment for digital investment, encourage healthy competition, and enhance operational efficiency for both businesses and institutions.

The implementation plan will consist of clear, coordinated phases, actively involving state institutions, the private sector, and civil society.

This approach ensures dynamic adaptation to technological developments and alignment with international standards, supporting the establishment of a sustainable, reliable, and comprehensive digital identity infrastructure in Kosovo.

Expected outcomes of this option include:

- Establishment of the digital identity wallet, allowing secure identity verification and standardized access to public and private services;
- Cross-border interoperability;
- Enhanced security, reliability and protection of personal data;
- Deployment of advanced technologies and modern security standards;
- Promotion of innovative digital services, transparency, and improved quality of public services.

The law will clearly define the roles and responsibilities of competent authorities and outline monitoring and regulatory mechanisms in accordance with international standards and eIDAS 2.0 Regulation.

The table below outlines the implementation plan for this option, which constitutes a long-term strategic solution designed to achieve full modernization of the legal framework for electronic identification and trusted services in Kosovo. Furthermore, the

implementation of this option will establish the foundations for a system harmonized with the European Union, guaranteeing security, interoperability, and high efficiency in the delivery of trust services.

Table 12. Implementation plan for Option 3

Purpose the policy	Adapting the existing Law on Electronic Identification and Trust Services in line with the eIDAS 2.0 Regulation, aiming to enhance existing provisions and incorporate new concepts in accordance with European Union standards.								
Strategic objective	Establish a new legal framework fully aligned with the eIDAS 2.0 Regulation, ensuring the secure, reliable and interoperable functioning of electronic identification and trusted services in Kosovo.								
	Output, activities, year and responsible organization/department/expected cost								
Specific objective	Output / Activity		Year 1	Year 2	Year 3	Year 4	Year 5	Responsible institution/department	Expected cost figure
1. Transposition of the eIDAS 2.0 Regulation into local legislation	1.1 New Law on Electronic Identification, Trust Services and the Digital Identity Wallet	1.1.1 Drafting of the Law.	7.5k €					MDAP	Low 7.5k €
	1.2 Regulations deriving from the new law	1.2.1 Drafting of the Regulations governing the functioning of the digital wallet		18k €				MDAP	Low 18k €
		1.2.2 Amendment of existing Regulations in			15k €			MDAP	Low 15k €

		accordance with the requirements of the new law							
2. Development of technological infrastructure according to eIDAS 2.0	2.1 Digital identity wallet - functional	2.1.1 Maintenance and expansion of technical infrastructure and addition of services (integration with national registry+cybersecurity+hosting+auditing)	500k €	200k €	200k €	200k €	200k €	MDAP	High 1,300,000 k €
		2.1.2 Number of services provided through the digital identity wallet		3.0k €	3.0k €	2.0k €	2.0k €	MDAP	Low 10k €
3. Ensuring cross-border interoperability	3.1 Cross-border connection - functional	3.1.1 Development of APIs and modules to enable cross-border interoperability		150k €	150k €			MDAP	Moderate 300k €
		3.1.2 Testing and certification of interconne			100k €	50k €		MDAP	Moderate 150k €

		ction with EU systems							
4. Institutional capacity building and oversight	4.1 Establishment of the oversight mechanism	4.1.1 Recruitment of staff responsible for coordinating, monitoring and supervising the implementation process of the new Law		24k €	24k €	24k €	24k €	MDAP	Moderate 120k €
		4.1.2 Design and implementation of a structured vocation training and certification program for the personnel of the competent institutions.		40k €	20k €	15k €		MDAP	Moderate 75k €
5. Public awareness and education	5.1 Drafting an information program on electronic identification , including a practical guide for the use of the digital	5.1.1 Ongoing public information campaigns on the use of electronic identification and	45k €	35k €	25k €			MDAP	Moderate 105k Euro

	identity wallet and electronic signature.	the Digital Identity Wallet.							
		5.1.2 Editing multimedia educational materials (short videos and infographics), as well as frequently asked questions sessions	15k €	10k €				MDAP	Low 25 k €

Chapter 7

Conclusion and next steps

Kosovo has signed the Stabilization and Association Agreement with the European Union, which aims to align its legislation with that of the EU. Taking into account the commitment of the Republic of Kosovo to align its legislation in the area of electronic identification (eID) and trust services with EU standards, as well as to ensure its effective implementation within the Stabilization and Association Agreement (SAA) between the EU and Kosovo, which has been in force since April 2016, the objective is to advance cooperation in this area.

Pursuant to Article 111 of the SAA, the parties are committed to strengthening cooperation in the area of electronic communications networks and services, with the aim that, within five years from the entry into force of the Agreement, Kosovo should have adopted the EU acquis in this sector. Particular attention is given to ensuring and strengthening the independence of the relevant regulatory authorities.

The transposition of the eIDAS 2.0 Regulation through the drafting and adoption of a new Law on Electronic Identification, Trust Services and the Digital Identity Wallet aims

to reflect the current reality of the electronic services market, which has evolved into a competitive market with multiple stakeholders and diverse services for consumers.

Consequently, the option recommended by this group is the drafting and adoption of a new Law on Electronic Identification, Trust Services and the Digital Identity Wallet, for the implementation of which the following steps should be undertaken:

1. Establishment of the Working Group for drafting the new Law by the ME – represented by relevant government institutions, regulatory authorities, and stakeholders from the public and private sectors;
2. Analysis of existing legislation – identifying provisions that need to be aligned or repealed in line with the requirements of the eIDAS 2.0 Regulation (EU) and best practices of the European Union;
3. Drafting the new law – including provisions governing the use of the Digital Identity Wallet (EUDI Wallet), management of verifiable credentials and extended trust services;
4. Preliminary (inter-institutional) consultation – the draft law is submitted to all institutions to collect comments on its alignment with other applicable laws;
5. Public consultation – includes publication procedures on the online platform to ensure transparency and broad participation during the drafting process, and analysis of received comments;
6. Approval of the law by the Government and the Assembly of the Republic of Kosovo – including approval procedures first in the Government and then in the Assembly, in accordance with the relevant legislative procedures.
7. Drafting of bylaws for implementation – covering procedures for preparing bylaws to define technical standards, security requirements, and procedures for providing trust services and operating the digital identity wallet.
8. Amending existing bylaws – involving the conduct of legal procedures in accordance with the applicable legislation.
9. Implementation and monitoring of the law – encompass activities to establish institutional and technical infrastructure for the implementation of electronic identification procedures, operation of the electronic identity portfolio, and the establishment of mechanisms to monitor and report on the progress of implementation.

Through these implementation steps, a stable legal framework aligned with the most advanced European practices will be ensured, directly facilitating technical and administrative procedures, reducing bureaucracy, and saving time, which will improve citizens' capacities and quality of life, as well as create business facilitation.

Furthermore, this legislation will provide a basis for setting new strategic objectives and ensure that the new provisions are implemented obligatorily at the national level.

7.1 Monitoring and evaluation provisions

Monitoring constitutes an essential component for the effective implementation of new policies across any sector. It facilitates the efficient utilization of electronic services and plays a pivotal role in achieving defined objectives and securing the overall success of the reform.

As part of the transposition of eIDAS 2.0, the Ministry of Digitalization and Public Administration will assume responsibility for monitoring and assessing the implementation of the new legislation, tracking the fulfillment of specific objectives within its mandate.

This process encompasses the evaluation of:

- Compliance with European Union legal and regulatory standards;
- Administrative capacities and the professional development needs of personnel;
- Socio-economic impacts on the electronic identification and trust services sector;
- Environmental protection considerations, where applicable;
- Transparency and stakeholder engagement through public consultation processes;
- Effective and targeted communication of legal and technical changes to stakeholders and end-users.

Primary monitoring indicators include:

1. Alignment with the EU eIDAS 2.0 Regulation, ensuring accurate and timely implementation of European standards;
2. Operationalization of the Digital Identity Wallet, with emphasis on security, accessibility and functionality for users;
3. Authorization and oversight of trust service providers via licensing and inspection mechanisms;

4. Measures safeguarding the security and privacy of personal data and electronic transactions;
5. Safeguarding the independence, transparency, and accountability of regulatory authorities;
6. Procedures for addressing complaints and resolving disputes to protect user rights;
7. Measures promoting social inclusion and equitable access for vulnerable groups, ensuring accessibility for persons with disabilities and other groups in need.

In general, monitoring will assess performance, impact on users and businesses, and compliance with legal obligations and international standards.

7.2 Additional Clarifications

All obligations arising from this Concept Document, which were previously under the competence of the Ministry of Economy, are, with the establishment of the Ministry of Digitalization and Administration, transferred to and fall within the remit of this Ministry.

Annex 1: Economic impact assessment form

Economic category impacts	Key impact	Is this impact expected to occur?		Number of organizations, companies and/or individuals affected	Expected benefit or impact cost	Preferred level of analysis
		Yes	No			
Job positions ³	Will the current number of job positions increase?	Yes		Low	Low	There will be a slight increase in jobs for professionals with digital skills (IT, cybersecurity, trust service providers).
	Will the current number of jobs decrease?		No	Low	Low	/
	Will it affect the level of payment?	Yes		Low	Low	There will be a salary increase for professionals with digital skills
	Will it have an impact on making it easier to find a job?	Yes		Low	Low	It will have a positive impact on job opportunities for young people with digital skills.
Doing business	Will it affect access to finance for business?	Yes		High	High	It simplifies procedures and increases transparency in doing business.
	Will certain products be removed from the market?		No	Low	Low	/

³ When it affects jobs, there will also be social impacts.

	Will certain products be allowed on the market?	Yes		Low	Low	It enables the use of new digital products and services.
	Will businesses be forced to close?		No	Low	Low	/
	Will new businesses be established?	Yes		Low	Low	Incentives for innovative enterprises in the digital sector are increasing.
Administrative burden	Will businesses be forced to comply with the obligations of providing new information?	Yes		High	High	Initially, there may be new reporting requirements.
	Have the information submission obligations for businesses been simplified?	Yes		High	High	In the medium and long term, a significant reduction in the administrative burden is expected.
Trade	Are current import flows expected to change?		No	Low	Low	/
	Are current export flows expected to change?	Yes		Low	Low	In the long term, there is expected to be an increase in exports of digital services.
Transportation	Will it have an impact on the mode of passenger and/or goods transport?		No	Low	Low	/
	Will there be any change in the time required to transport passengers and/or goods?		No	Low	Low	/
Investment	Are companies expected to invest in new activities?	Yes		High	High	Investments in digital infrastructure and innovation are expected.

	Are companies expected to cancel or postpone investments?		No	Low	Low	/
	Will investments from the diaspora increase?	Yes		Low	Low	Diaspora investments expected
	Will investments from the diaspora decrease?		No	Low	Low	/
	Will foreign direct investment increase?	Yes		Low	Low	/
	Will foreign direct investment decrease?		No	Low	Low	/
Competitiveness	Will the business price of products, such as electricity, increase?		No	Low	Low	/
	Will the price of business inputs, such as electricity, decrease?	Yes		Low	Low	
	Are innovations and research likely to be promoted?	Yes		High	High	In the long term
	Are innovations and research likely to be hampered?		No	Low	Low	/
Impact on SMEs	Are the companies affected mainly SMEs?	Yes		High	High	The reform is expected to facilitate their operation and access to markets.
Prices and competition	Will the number of goods and services available to the business or consumers increase?	Yes		Low	Low	
	Will the number of goods and services available to the business or consumers decrease?		No	Low	Low	/
	Will prices for existing goods and services increase?		No	Low	Low	/
	Will the prices of existing goods and services decrease?	Yes		Low	Low	A decrease in electronic services is expected
Regional economic impacts	Will any specific business sector be affected?	Yes		High	High	Businesses based on digital activities will be affected.

	Is this sector concentrated in a specific region?		No	Low	Low	
Overall economic development	Will future economic growth be affected?	Yes		Low	Low	A small increase is expected from the reduction of administrative costs.
	Is it likely to have any impact on the inflation rate?		No	Low	Low	/

Annex 2: Social impact assessment form

Social category impacts	Key impact	Is this impact expected to occur?		Number of organizations, companies and/or individuals affected	Expected benefit or impact cost	Preferred level of analysis
		Yes	No			
Job positions ⁴	Will the current number of job positions increase?	Yes		Low	Low	Gradual employment growth is expected, especially for professionals with digital skills.
	Will the current number of jobs decrease?		No	Low	Low	/
	Are jobs in a particular business sector affected?	Yes		Low	Low	It is expected to have an impact on the digital economy sector.
	Will there be any impact on the level of payment?	Yes		Low	Low	Salaries are expected to increase for professionals with digital and technical skills.

⁴ When it affects jobs, there will also be economic impacts.

	Will it have an impact on making it easier to find a job?	Yes		Low	Low	It is expected to provide relief for professionals with digital and technical skills
Regional social impacts	Are social impacts concentrated in a particular region or city?		No	Low	Low	/
Work conditions	Are employees' rights affected?		No	Low	Low	/
	Are standards for working in hazardous conditions foreseen or repealed?		No	/	/	eIDAS does not affect regulations related to physical working conditions or workplace safety.
	Will it have an impact as to how social dialogue is developed between employees and employers?	Yes		Low	Low	Developing a more documented dialogue
Social inclusion	Will it have an impact on poverty?	Yes		Low	Low	For people without digital skill, such as the elderly, those living in rural areas, and persons with disabilities, there may be a risk of digital exclusion.
	Will access to social protection schemes be affected?		No	Low	Low	/
	Will the price of basic goods and services change?		No	Low	Low	/
	Will there be an impact on the funding or organization of social protection schemes?		No	Low	Low	/
Education	Will it have an impact on primary education?		No	Low	Low	/

	Will it have an impact on secondary education?		No	Low	Low	/
	Will it have an impact on higher education?		No	Low	Low	/
	Will it have an impact on vocational training?	Yes		Low	Low	Digital skills training included
	Will it have an impact on employee training and lifelong learning?	Yes		High	High	Training is needed to improve digital skills for administration, which also requires technical certifications.
	Will it have an impact on the organization or structure of the education system?		No	Low	Low	/
	Will there be an impact on academic freedom and self-governance?		No	Low	Low	/
Crop	Does the option affect cultural diversity?		No	Low	Low	/
	Does the option affect the funding of cultural organizations?		No	Low	Low	/
	Does the option affect the opportunities for people to benefit from or participate in cultural activities?	Yes		Low	Low	
	Does the option affect the preservation of cultural heritage?	Yes		Low	Low	It affects the digitalization of cultural heritage (indirectly)
Governance	Does the option affect the ability of citizens to participate in the democratic process?	Yes		Low	Low	Public information - Yes (moderate)

	Is every person treated equally?	Yes		High	High	There is a risk of digital exclusion for marginalized groups
	Will the public be better informed of certain issues?	Yes		Low	Low	/
	Does the option affect the way political parties function?		No	Low	Low	/
	Will it have any impact on civil society?	Yes		Low	Low	
Public health and safety ⁵	Will it have any impact on people's lives, such as life expectancy or mortality rate?		No	Low	Low	/
	Will there be an impact on the quality of food?		No	Low	Low	/
	Will the health risk increase or decrease due to harmful substances?		No	Low	Low	/
	Will there be health impacts due to changes in noise levels or air, water and/or soil quality?		No	Low	Low	/
	Will there be health impacts due to changes in energy use?		No	Low	Low	/
	Will there be health impacts due to changes in waste disposal?		No	Low	Low	/
	Will it have an impact on people's lifestyles, such as levels of interest in sports, changes in nutrition, or changes in tobacco or alcohol use?		No	Low	Low	/

⁵ When there is an impact on public health and safety, there are usually environmental impacts as well.

	Are there specific groups that face much higher risks than others (determined by factors, such as age, gender, disability, social group or region)?		No	Low	Low	/
Crime and security	Does it affect likelihood to catch criminals?	Yes		Low	Low	It may have a positive impact on reducing corruption through traceability and fewer physical interactions.
	Will potential criminal profits be affected? Yes, they may be reduced.		No	Low	Low	/
	Does it affect levels of corruption?		No	Low	Low	/
	Is law enforcement capacity affected?		No	Low	Low	
	Is there any impact on the rights and safety of victims of crime?		No	Low	Low	/

Annex 3: Environmental impact assessment form

Environmental category impacts	Key impact	Is this impact expected to occur?		Number of organizations, companies and/or individuals affected	Expected benefit or impact cost	Preferred level of analysis
		Yes	No			
Stable climate and environment	Will it have an impact on greenhouse gas emissions (carbon dioxide, methane, etc.)?	Yes		Low	Low	Emissions decrease due to fewer physical travels, less paper use, and reduced in-person procedures, but

						consumption may increase slightly.
	Will fuel consumption be affected?	Yes		Low	Low	A slight decrease in fuel consumption is expected due to reduced physical travel.
	Will the mix of energy sources used for production change? No, it is not expected to change.		No	Low	Low	/
	Will there be any price changes for environmentally friendly products?		No	Low	Low	/
	Will certain activities become less polluting?	Yes		Low	Low	Digitalizing administrative processes can reduce paper use and the physical transport of documents.
Air quality	Will it have an impact on the emission of air pollutants?		No	Low	Low	/
Water quality	Does the option affect freshwater quality?		No	Low	Low	/
	Does the option affect groundwater quality?		No	Low	Low	/
	Does the option affect drinking water sources?		No	Low	Low	/
Soil quality and land use	Will it have an impact on soil quality (in relation to acidification, pollution, use of pesticides or herbicides)?		No	Low	Low	/
	Will there be an impact on land erosion?		No	Low	Low	/
	Will land be lost (through construction, etc.)?		No	Low	Low	/

	Will land be acquired (through decontamination, etc.)?		No	Low	Low	/
	Will there be any change in land use (e.g from forest use to agricultural or urban use)?		No	Low	Low	/
Waste and recycling	Will the amount of waste generated change?	Yes		Low	Low	Paper waste will decrease, but there may be a very small increase in electronic waste (servers, devices).
	Will the ways in which waste is treated change?		No	Low	Low	/
	Will it have an impact on waste recycling?		No	Low	Low	/
Use of resources	Does the option affect the use of renewable sources (fish stocks, hydropower plants, solar energy, etc.)?		No	Low	Low	/
	Does the option affect the use of resources that are not renewable (groundwater, minerals, coal, etc.)?		No	Low	Low	/
The degree of environmental risks	Will there be any impact on the likelihood of hazards, such as fires, explosions or accidents?		No	Low	Low	/
	Will it affect preparedness in case of natural disasters?		No	Low	Low	/
	Is the protection of society from natural disasters affected?		No	Low	Low	/
Biodiversity, flora and fauna	Will it have an impact on protected or endangered species or the areas where they live?		No	Low	Low	/
	Will the size or connections between landscape areas be affected?		No	Low	Low	/

	Will there be any impact on the number of species in a given area?		No	Low	Low	/
Animal welfare	Will animal treatment be affected?		No	Low	Low	/
	Will animal health be affected?		No	Low	Low	/
	Will the quality and safety of animal food be affected?		No	Low	Low	/

Annex 4: Fundamental rights impact assessment form

Fundamental rights category impacts	Key impact	Is this impact expected to occur?		Number of organizations, companies and/or individuals affected	Expected benefit or impact cost	Preferred level of analysis
		Yes	No			
Dignity	Does the option affect people's dignity, their right to life or a person's integrity?	Yes		Low	Low	It facilitates access to services
Freedom	Does the option affect the right to freedom of individuals?	Yes		Low	Low	/
	Does the option affect a person's right to privacy?	Yes		High	High	Significant impact (requiring legal guarantees)
	Does the option affect the right to marry or create a family?		No	Low	Low	/
	Does the option affect the legal, economic or social protection of individuals or the family?		No	Low	Low	/
	Does the option affect freedom of thought, conscience or religion?		No	Low	Low	/
	Does the option affect freedom of expression?		No	Low	Low	/
	Does the option affect freedom of assembly or association?		No	Low	Low	/

No.	Does the option include the processing of personal data?	Yes		High	High	It increases data processing and the need to comply with the Law on Protection of Personal Data (GDPR)
	Are the individual's rights of access, redress and objection guaranteed?	Yes		High	High	They are guaranteed by Law No. 06/L-082 on Protection of Personal Data
	Is the way in which personal data is processed clear and well protected?	Yes		High	High	The processing of personal data is regulated by Law No. 06/L-082 on Protection of Personal Data
Asylum	Does this option affect the right to asylum?		No	Low	Low	/
Property rights	Will property rights be affected?		No	Low	Low	/
	Does the option affect the freedom to do business?		No	Low	Low	/
Equal treatment ⁶	Does the option protect the principle of equality before the law?	Yes		High	High	It increases equal treatment of citizens by creating opportunities to access their documents from anywhere and by anyone, but requires measures to prevent indirect discrimination.
	Are certain groups likely to be harmed, directly or indirectly Gender discrimination (e.g, discrimination on the basis of race, color, ethnicity,		No	Low	Low	/

⁶ Gender equality is treated under *Gender Impact Assessment*

	political or other opinion, age or sexual orientation)?					
	Does the option affect the rights of people with disabilities?	Yes		High	High	This is reasonable if accessibility standards are complied with.
Child rights	Does the option affect child rights?	Yes		Low	Low	/
Good administration	Will administrative procedures become more complicated?		No	Low	Low	/
	Is the way the administration makes decisions (transparency, processing time, right of access to the file, etc.) affected?	Yes		High	High	Administrative procedures will be simpler - more correct
	Regarding the criminal law and foreseen sanctions: are the rights of the accused affected?	Yes		Low	Low	It may have an indirect impact through electronic evidence.
	Is access to justice affected?	Yes		Low	Low	The impact is indirect through electronic communication and electronic signatures.



REPUBLIKA E KOSOVES / REPUBLIKA KOSOVA / REPUBLIC OF KOSOVO QEVERIA - VLADA - GOVERNMENT MINISTRIA E EKONOMISE MINISTARSTVO EKONOMIJE MINISTRY OF ECONOMY			
Njësia Org. Org. Jedin. Org. Unit	02	Nr. Prot. Br. Prot.	3674
Nr. ifaqesë Straj stranica No. pages	1	Datim: Datum:	24.07.25
PRISTINE A			NO 1

Republika e Kosovës
Republika Kosova - Republic of Kosovo
Qeveria - Vlada - Government
Ministria e Ekonomisë
Ministarstvo Ekonomije – Ministry of Economy

Sekretarja e Përgjithshme e Ministrisë së Ekonomisë, në mbështetje të nenit 18 të Ligjit Nr.06/L-113 për Organizimin dhe Funksionimin e Administratës Shtetërore dhe të Agjencive të Pavarura, dhe bazuar në nenin 42 të Rregullores Nr.17/2024 për Punën e Qeverisë së Republikës së Kosovës, merr këtë:

V E N D I M

1. Themelohet Ekipi Punues për hartimin e Koncept Dokumentit për identifikimin elektronik dhe shërbimet e besuara në transaksionet elektronike në përbërje të përfaqësuesve si në vijim:

- 1.1. Ajshe Jashari, Departamenti për Teknologji Informativ dhe Komunikuese /ME, kryesuese;
- 1.2. Fatos Selimi, Departamenti për Integrim Evropian dhe Koordinim të Politikave/ME, anëtar;
- 1.3. Deniza Krasniqi, Departamenti Ligjor/ME, anëtare;
- 1.4. Nehat Rrahimi, Departamenti për Buxhet dhe Financa/ ME, anëtar;
- 1.5. Egzona Raçi , Sekretariati Koordinues i Qeverisë/ ZKM, anëtare;
- 1.6. Rexhë Berisha, Ministria e Punëve të Brendshme, anëtar;
- 1.7. Genc Hamzaj, Agjencia e Shoqërisë së Informacionit, anëtar;
- 1.8. Defrim Krasniqi, Agjencia e Regjistrimit të Bizneseve të Kosovës, anëtar;
- 1.9. Arben Osmani, Agjencia për Regjistrim Civil, anëtar
- 1.10. Jeton Aliu, Drejtoria e Akreditimit të Kosovës, anëtar;
- 1.11. Partin Pruthi, Shoqata e Bankave të Kosovës, anëtar;
- 1.12. Jehona Nushi, Banka Qendrore e Kosovës, anëtare;
- 1.13. Sanije Himaj/Ministria e Financave, Punës dhe Trasnfereve, anëtare;
- 1.14. Marcelë Restelica, Autoriteti Rregullativ të Komunikimeve Elektronike dhe Postare, anëtare;

2. Ekipi Punues ka për detyrë të hartojë Koncept Dokumentin për identifikimin elektronik dhe shërbimet e besuara në transaksionet elektronike në pajtim me Rregulloren Nr.17/2024 për Punën e Qeverisë së Republikës së Kosovës dhe Udhëzuesin përkatës për Hartimin e Koncept Dokumenteve.

3. Vendimi hyn në fuqi ditën e nënshkrimit.

Leonita Shabani Mullarama

Prishtinë, 24.07.2025

Iu dërgohet:

- Ekipit Punues;
- Zyrës së Sekretares së Përgjithshme;
- Arkivit.

Sekretare e Përgjithshme



REPUBLIC OF KOSOVO
MINISTRY OF ECONOMY

Pursuant to Article 18 of Law No. 06/L-113 on the Organisation and Functioning of the State Administration and Independent Agencies, and based on Article 42 of Regulation No. 17/2024 on the Rules of Procedure of the Government of the Republic of Kosovo, the Secretary General of the Ministry of Economy hereby issues the following:

DECISION

1. A Working Group is hereby established for drafting the Concept Document on electronic identification and trust services for electronic transactions, composed as follows:

- 1.1. Ajshe Jashari, Department of Information and Communication Technology/ME, Chairperson;
- 1.2. Fatos Selimi, Department for European Integration and Policy Coordination/ME, member;
- 1.3. Deniza Krasniqi, Legal Department/ME, member;
- 1.4. Nehat Rrahimi, Department for Budget and Finance/ME, member;
- 1.5. Egzona Raçi, Government Coordination Secretariat/OPM, member;
- 1.6. Rexhë Berisha, Ministry of Internal Affairs, member;
- 1.7. Genc Hamzaj, Information Society Agency, member;
- 1.8. Defrim Krasniqi, Kosovo Business Registration Agency, member;
- 1.9. Arben Osmani, Civil Registration Agency, member;
- 1.10. Jeton Aliu, Kosovo Accreditation Directorate, member;
- 1.11. Partin Pruthi, Kosovo Banking Association, member;
- 1.12. Jehona Nushi, Central Bank of Kosovo, member;
- 1.13. Sanije Himaj, Ministry of Finance, Labour and Transfers, member;
- 1.14. Marcelë Restelica, Regulatory Authority of Electronic and Postal Communications, member.

2. The Working Group shall be responsible for drafting the Concept Document on electronic identification and trust services for electronic transactions, in accordance with Regulation No. 17/2024 on the Rules of Procedure of the Government of the Republic of Kosovo and the relevant Guidelines for Drafting Concept Documents.

3. This Decision shall enter into force on the date of its signature.

Prishtina, 24 July 2025

Leonita Shabani Mullarama
Secretary General

To be distributed to:

- Members of the Working Group;

- Office of the Secretary General;
- Archive.