ALTLIBRE PAPERS · NO. 5

The Case for Joining

Britain and the European Digital Identity Wallet.

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The Case for Joining

Identity is the last border. This paper argues that Britain should be on the inside of it: join the European wallet framework, adopt the protocol, keep the issuance.

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Facts checked as at 20 November 2026, against the joint statement of the EU-UK summit of that date. Volatile claims carry their date.

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Executive summary · the argument in one view

Executive summary

01

The deadline

On 24 December 2026, European law requires every member state to make a digital identity wallet available to its citizens, residents and businesses. The clock in Article 5a of the amended eIDAS Regulation runs twenty-four months from the implementing acts, and it lands on 24 December 2026. Acceptance follows from December 2027, sector by sector. The member states will not all make it: Germany's wallet, d-you, is openly planned for January 2027. Serious coverage will report both facts.

02

The condition Britain is already in

On 19 December 2025 the European Commission renewed the UK adequacy decisions to 27 December 2031, conditional on the UK's data protection regime staying aligned. Britain complies with a rulebook it cannot amend, renewed at another jurisdiction's discretion. That is not sovereignty. It is the standing condition of the UK's data economy, and identity is about to become its largest instance.

03

The gap nobody is governing

The wallet reaches natural and legal persons. It gives an AI agent no identity to hold, and no issuer to hold one from. While parliaments watched, Mastercard launched Agent Pay in April 2025, Visa followed with Intelligent Commerce, and Visa, Mastercard and Ant International opened a Know-Your-Agent interoperability framework on 10 September 2026. A W3C community group on agent credentials published its call for participation on 24 April 2026. Every framework on that list states what an agent may do. None states who vouches for the agent, under whose law, with what remedy. A credential issued by a company that cannot be sued is a private passport.

04

The hole in the reset

The package agreed at the UK-EU summit of 20 November 2026 aligns animal and plant health standards, links emissions trading schemes worth up to £3.8 billion a year by the government's own factsheet, commits to defence industrial cooperation and opens youth mobility. Identity verifies more daily cross-channel activity than anything in that package. It is missing from it, in a relationship worth £384 billion a year in UK exports.

05

The ask

A mutual recognition agreement on digital identity in the next chapter of the reset. British issuers recognised inside the European trust framework; European wallets recognised by UK services; the shared credential standards adopted; issuance kept entirely British. What it does not require: no EU membership, no identity card, no population register, no authority in Brussels over a single British credential. Britain is not arriving empty-handed: the Agent Charter in Annex A, three rules for machine identity that no current framework provides, and an identity criterion for the AltLibre Sovereignty Scorecard in Annex B.

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CHAPTER 1 · WHAT GOES LIVE THIS MONTH

1. What is the European wallet, and what goes live this month?

A wallet is a phone application, issued by a member state, in which a person holds credentials about themselves and shows them to whoever needs proof, without handing over more than the question requires. A drinker proves over-18 without disclosing a birth date or an address. A business onboarding a customer receives a government-backed assurance instead of a photographed passport attached to an email. The wallet holds person identification data and attestations: identity, qualifications, entitlements. What it is designed not to be is a population register. A nation that issues wallets is not obliged by the protocol to hold a file on its people; the point of the architecture is that the citizen holds the file, and discloses the minimum.

The law is Regulation (EU) 2024/1183, amending the eIDAS Regulation of 2014. Article 5a gives each member state twenty-four months from the entry into force of the implementing acts to provide at least one wallet, free, to citizens, residents and businesses: 24 December 2026. Article 5f brings the acceptance duties behind it. From December 2027, public bodies that require electronic identification for an online service must accept the wallet; so must private providers required by law or contract to use strong authentication, in the sectors the regulation names: transport, energy, banking, financial services, social security, health, drinking water, postal services. Large online platforms covered by the Digital Services Act must accept wallet identification where they would otherwise use strong user authentication. The technical shape has been public since 23 July 2026, when the Commission published version 3.0.0 of the Architecture and Reference Framework, and a July 2026 amendment settled the person identification data in the SD-JWT VC and ISO/IEC mdoc formats: two open standards, agreed, written down.

Where do the member states stand? Unevenly, and the deadline coverage in the coming weeks will be wrong in both directions: half of Europe missing the story, half of it inventing catastrophe. Denmark launched its wallet, AltID, on 3 June 2026. Finland's wallet reached the public on 1 October 2026. Germany's d-you is openly planned for January 2027, a member state in plain sight of its own missed deadline. As at mid-October 2026, when the tracker Eudigo last surveyed all twenty-seven, no member state wallet appeared on a Commission certified list, because the Commission had published none. A law with a deadline and no certified list forty days out is a law that will be tested in public, which is how deadlines get kept.

What matters is not the system promised in December 2026. It is the obligations that bite from December 2027: hundreds of millions of Europeans holding a government-backed credential that a ready onboarding flow can verify in seconds. The firms that accept it take the customers of the firms that do not.

CHAPTER 2 · THE PARALLEL SYSTEM

2. Where does Britain stand?

Britain is building the same thing with different letters, and paying for the alignment it refuses to negotiate. GOV.UK One Login is the cross-government account that much of the adult population already holds. The GOV.UK Wallet is on a staged path to public rollout of the digital driving licence during 2026, government-confirmed. The Data (Use and Access) Act

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2025 carried the UK's digital verification services trust framework onto statutory footing, so Britain has a certified market for identity proofing with its own rulebook and its own certification regime. Britain is not a country without digital identity policy. It is a country with a parallel one.

The parallel has a cost schedule. On 19 December 2025 the European Commission renewed the UK adequacy decisions, running to 27 December 2031, conditional on the UK's data protection regime remaining aligned with the European one. Renewal is discretionary, periodic and one-directional. Britain complies with the GDPR in all but name because the alternative is data flows stopping at the border, and it holds that position at Brussels' pleasure rather than by treaty right.

By the end of 2027 the position is this, whatever the policy says. A British firm onboarding a German customer watches that customer present a wallet credential the British trust framework cannot natively verify, through middleware sold by a third party, under rules written in Brussels. The firm complies. The framework adapts around it, or does not. Nobody in Britain holds a vote on any part of it.

CHAPTER 3 · WHO IS DECIDING, AND WHERE

3. Who is deciding identity for machines?

Not parliaments. The wallet reaches natural and legal persons, which means a person can hold one and a company can hold one. An AI agent can hold nothing: the regulation gives a machine no identity to hold, no issuer to hold one from, and no court to revoke it in. The gap was noticed, and it was filled by the payment networks, because agents were already spending money and somebody had to let them.

The sequence is short and recent. Mastercard launched Agent Pay in April 2025, certifying agents to transact on its rails. Visa followed with Intelligent Commerce. On 10 September 2026, Visa, Mastercard and Ant International opened a joint Know-Your-Agent interoperability framework, so that an agent's identity could be checked across networks rather than within one. A W3C community group published its call for participation on 24 April 2026 to standardise how agents present cryptographically verifiable credentials. GLEIF, the body behind the global legal entity identifier, is publishing on how an agent's identity should connect upward to the organisation behind it. Academic work proposing decentralised identifiers and verifiable credentials for agents went up on arXiv in November 2025.

Take a worked example. A Cardiff manufacturer's sourcing agent buys from a Copenhagen supplier. The agent holds a Know-Your-Agent credential. Who issued it? A payment network. Under what law? A contract between two companies. Revocable by whom, with what notice, and where would a Welsh court sit in the chain? Nowhere. The transaction is lawful, fast, cheap, and answerable to no court that either party can reach.

The gap is not an oversight in these frameworks; it is their business model. A credential issued by a company that cannot be sued is a private passport: issued by contract, revoked by contract clause, honoured for exactly as long as it suits the issuer. This is the same swap the productivity suite vendors ran over data, now run over the authority to act. Sovereignty washing has reached the identity layer.

These rules arrive on British commerce whatever Westminster does about them. So the choice is narrow: the machine identity rules will be written either at a table Britain attends, or under law it does not.

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CHAPTER 4 · THE OBJECTION WITH HISTORY BEHIND IT

4. Isn't this the ID card by the back door?

Of the objections, this one has the history behind it, and it gets the straightest answer. Britain passed the Identity Cards Act in 2006 and repealed it in 2010 with unusual cross-party finality. The 2006 scheme was a national register, a card that carried the register, and a state that held the file on every person required to carry proof of being one. The objection to that scheme was correct, and this paper asks Britain to revisit none of it. The European wallet is not that scheme, and the difference is architectural.

A wallet is a credential holder. A register is the opposite: the architecture puts the attributes in the citizen's hands, discloses the minimum a question requires, and leaves the state holding less than it holds today, not more. Nothing in the protocol obliges a member state to create an identity number, a population register or a compulsory card. Denmark built its wallet on existing documents, and the protocol is indifferent to how each state arranges its filing: it specifies the container, not the state's records.

The surveillance objection is real, and it is being argued in Europe properly. In an open letter of 10 March 2026, EDRi, epicenter.works and co-signatories challenged the fourth batch of eIDAS implementing acts over audit trails that risk recording where a citizen proves what. The Commission's push to make facial images mandatory drew sustained criticism through 2026. Within days of Finland's launch, researchers reported weakened tracking protections. Europe is having the privacy argument in the open, in implementing-act consultations and public letters, and Britain outside the room contributes to it not at all. Under the settlement in chapter 6, the safeguards stay where the objection wants them: British issuance, British courts, British oversight, under the same UK GDPR whose adequacy Brussels already renewed.

So the choice is not wallet versus no wallet; the wallet arrives on the continent in five weeks whatever Britain does. The choice is whether the safeguards are argued in a room Britain sits in, or accepted afterwards, once other people have finished arguing.

One concession before the argument closes. The scepticism on both sides of this debate is not fringe and it is not wrong in its premises. The British objection to registers is the correct reading of the 2006 scheme, and the European privacy objection is the correct reading of weak audit rules. This paper disagrees with neither premise. It answers both on architecture: the wallet keeps less state than a passport does, and the settlement keeps the rules that govern it in British courts.

CHAPTER 5 · THE RETURNS

5. What does Britain get?

For commerce, friction. UK exports to the EU ran at £384 billion in 2025, 41 per cent of all UK exports, on the Commons Library's own analysis, and the identity checks underneath a large share of it are stacked like double-handling at an old border: photographed passports in inboxes, utility bills as proof of address, unaudited vendors scraping documents they should never have held. The lived version is a hotel desk on the continent photographing a British passport and locking the photocopy in a drawer, because no system there can read a British credential. That stack is metered. A single in-person identity verification costs £7.50 on the government's own framework pricing; a wallet credential verifies cryptographically against a

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published trust list, in seconds, at effectively no marginal cost. From December 2027 the wallet lifts the meter across the sectors Article 5f names, banking first among them. A firm that verifies wallet credentials natively serves four hundred and fifty million people as easily as it serves Bristol. A firm that cannot, resells somebody else's middleware for the privilege.

For the island of Ireland, the return that has no price on it. The Common Travel Area predates both states and survived both of them; its seam runs through a border two governments have spent thirty years softening. Irish citizens hold European wallets from this December. A resident of Belfast presenting a credential to a service in Donegal, a Dublin employer engaging a worker from Newry, reaches the seam weekly if not daily. Recognition is not an IT project on that island; it is the seam staying soft. Non-recognition is a daily experiment Britain does not want run.

For the machine economy, the return only members get. The machine identity rules are being written now, by three card networks and a standards consortium, per chapter 3. Membership carries standing in that work: the right to register British issuers, to sit in the consultations, to put the accountable-issuer principle into the text before the text hardens. If you believe British agents will act under British law without Britain at the table, name the mechanism. There is not one.

CHAPTER 6 · THE MECHANISM, NAMED

6. What does joining look like?

Something Britain has done this month, under another name. The package agreed at the UK-EU summit on 20 November 2026 aligns animal and plant health standards, links emissions trading, cooperates on defence industry and opens youth mobility. The first is the template: Britain adopts a shared rulebook in a defined domain, keeps its own regulators and courts, and banks the result. The government's factsheet puts the emissions gain at up to £3.8 billion a year. Identity, which will verify more daily transactions than the whole package combined, was not in it. That is not a criticism of the summit; it is the next chapter, identified.

The mechanism has four parts, none of them novel.

First, trust-list participation. eIDAS already runs on mutual trust lists: one authority publishes who its issuers are, other authorities' software reads the list, credentials verify across borders. Norway, Iceland and Liechtenstein participate through the EEA without EU membership, which settles the sovereignty point: participation without membership has precedent in this regulation's own family.

Second, shared credential formats. The European wallet formats are open standards, SD-JWT VC and mdoc under the July 2026 amendment, from the same standards family the GOV.UK Wallet is built on. Interoperability here is an engineering task about formats and trust lists. It is not a constitutional task about identity.

Third, mutual recognition with issuance kept. British credentials verify inside the European framework because Britain's issuers sit on a trust list the framework reads; European wallets verify against UK services for the same reason. The register of who holds what, the issuers, the oversight and the courts where a revocation is challenged stay British. Where recognition itself is disputed, the animal and plant health alignment sets the pattern: disputes go to a joint committee, not to a foreign court. The principle is as old as coinage: agree the fineness, keep the mint. Britain does not lose sovereignty by adopting a standard; it exercises sovereignty by choosing it, and it keeps sovereignty by issuing under it.

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Fourth, the instrument, named. eIDAS provides no membership route for a non-EEA state today, and the Commission's own guidance is that legal equivalence for non-EU services flows from an EU agreement with the country concerned. So the ask is not an application to an existing club; it is the reset creating the instrument, in the same negotiated language as the animal and plant health alignment, with adequacy as the standing proof that Britain's regimes can be found aligned when both sides want them to be. A proposal that names a missing instrument and asks for it is a policy proposal. One that pretends the instrument exists is a press release.

What joining does not require, stated because the debate will raise each item: no EU membership; no new UK identity card; no population register; no authority in Brussels over a single British credential; no re-entry into any institution.

CHAPTER 7 · THE AGENT CHARTER

7. What would Britain bring?

The part of the machine identity rulebook that the current drafters are missing: the accountable issuer. The Agent Charter, in full in Annex A, has three rules. One: no commercial agent acts without a credential from an issuer accountable under European or UK law, because identity follows liability, and an issuer that cannot be sued is not a sovereign issuer. Two: an agent credential is a scoped, time-limited, revocable delegation rooted in the wallet identity of a natural or legal person, so every machine act traces to a person answerable for it, and authority granted for Tuesday's procurement cannot be spent on Friday's banking. Three: relying parties verify the issuer and the chain through a public registry, not the vendor's marketing. Shipping solved this a century ago with flag states; the full geometry is in Annex A.

The charter needs no treaty to take effect. A standards body can adopt the three rules as the accountability layer of an existing framework; the W3C group can take them into its work; a government can turn them into a licence condition; a single firm can apply them as procurement policy in a day. The rest of the operation is in Annex A.

Britain also brings an evidence discipline. Annex B extends the AltLibre Sovereignty Scorecard, the published rubric behind independent reviews of the technology Europe depends on, with an identity and agency criterion. The published reviews are re-scored against it, and every vendor named in this paper receives the evidence, the rubric and fourteen days to reply before publication, under AltLibre's published method.

CHAPTER 8 · THREE GATES

8. What should boards do either way?

Whether the government joins or not, the wallet arrives at the firm's front door in December 2027. Three gates, each a day's policy work.

From December 2027, no service without a wallet acceptance roadmap. The roadmap asks what a wallet credential replaces in your onboarding flow, which of the Article 5f sectors touch the firm, and what the middleware costs against native acceptance. Owners: the CIO and the compliance lead. A day to write, a week to cost.

Every agentic deployment states its credential chain and the issuer behind it. Your agents already act through credentials issued by vendors, networks or internal systems; the policy

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asks for the chain in writing: who issued, under what jurisdiction, revocable by whom, and with what audit trail for actions already taken. Where the chain passes through an issuer that cannot be sued, that is a vendor risk to price, replace or accept knowingly. Owners: the CISO and the data protection officer.

Join the logging to the identity. The EU AI Act already obliges deployers to keep logs of machine decisions, and the AI Act, DORA and GDPR duties are mapped together in the AltLibre article on decision log retention. The gate asks one question of those logs: does each entry trace to an identity a court could reach? Logging without attribution is theatre; attribution is the control.

None of the three gates is a project. Each is a day's work against a deadline that is already in statute.

CHAPTER 9 · THE ANSWER

9. Should the UK join?

Yes, on these terms: protocol adopted, issuance kept, agents brought to the table. Two wrong answers come first. Staying out does not preserve the status quo, because the machine identity rules arrive regardless, written elsewhere, and the wallet arrives at the firm's front door in December 2027 with or without a British signature on any trust list. Joining does not abolish sovereignty, because issuance is where sovereignty lives, and issuance is exactly what the settlement keeps.

The dates are the clock. Wallets go live on the continent on 24 December 2026. Acceptance bites through 2027. The adequacy receipt renews at Brussels' discretion until 27 December 2031, and Britain's compliance with a rulebook it cannot amend is already the standing condition of its data economy. The reset has shown this November that alignment in a defined domain, with regulators and courts kept at home, is the shape Britain's government now accepts on steel, carbon and agricultural standards. Identity is larger than any of those, and easier to align than most.

And the ask, made operational, is three tasks for a first hundred days. One: map the UK trust framework onto the European trust lists, the engineering scoping, costed in weeks. Two: pilot mutual recognition with the obvious partner, Ireland, on the one credential both systems already hold: the driving licence, read across the Common Travel Area seam where recognition matters most. Three: put the Agent Charter on the table as the British position on machine identity. Three named tasks, a pilot that starts on the island of Ireland, and an answer on machines: an announcement for the new year, against the December deadline.

The rules are being written this year and next. Joining means Britain helps write them. Staying out means signing them.

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Annex A · The Agent Charter

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Rule 1 · The accountable issuer

No commercial agent acts without a credential issued by an issuer accountable under European or UK law. Identity follows liability: an issuer that cannot be sued is not a source of authority, and a credential issued by a company is a contractual artefact, not a public one, whatever its marketing calls it. The test of an issuer is the test a court would apply: can it be joined, found liable, and made to answer for a wrongly issued credential?

Rule 2 · The delegation chain

An agent credential is a delegation, never a freestanding identity. It carries a scope, a duration and a revocation path, rooted in the wallet identity of a natural or legal person, so that every machine act traces upward to a person answerable for it. Authority delegated for a procurement on Tuesday cannot be spent on banking on Friday, because the scope is written on the credential by design rather than by policy document.

Rule 3 · The public registry

Relying parties verify the issuer and the chain, not the brand. The practical requirement is a public registry of agent credentials: issuer, jurisdiction, scope classes, revocation status, and the upward link to the accountable person or firm. Flag states solved this problem for shipping a century ago, and port state control lets any vessel be inspected in any port. The geometry adapts: every agent needs a port it can be inspected in, and every port a register it can read.

Operation. The charter takes effect without waiting for a statute. A firm applies it as procurement policy, in a day. A standards body adopts the rules as an accountability layer. A government converts them into a licence condition. Adoption order is a choice; the need is not.

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Annex B · The Sovereignty Scorecard

Annex B · The ninth criterion: identity and agency

Published as an annex pending incorporation into method v2.0, with re-scoring of the published reviews.

Does the service accept and verify wallet-issued credentials for persons, European or UK framework? Do the machine credentials it issues route through issuers accountable in a European or UK jurisdiction? Are delegation chains auditable to a natural or legal person?

4 · Sovereign

Accepts wallet-issued person credentials natively; machine credentials issued route through accountable issuers; chains auditable to a person, and every link reachable by a court.

3 · Committed

Native acceptance on a published roadmap against the 2027 obligations; agent credentials documented with issuer and jurisdiction; audit trails exist, but delegation scope is set by policy document rather than on-credential attributes.

2 · Conditional

Acceptance only through third-party middleware; agent credentials held under vendor terms of service, revocable without cause or notice; chains trace to a vendor rather than to the acting organisation.

1 · Dependent

No roadmap; agents act under vendor-issued credentials with no named issuer jurisdiction; no attribution path from a machine action to a person.

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About the author

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