



[17/08/2026]

**[CT2274/2026 - Services - Tender for the Implementation of a Fully Compliant European Digital Identity Wallet (EUDIW), Supporting Trust Ecosystem and use cases for the Malta Digital Innovation Authority (MDIA)]**

**Clarification Note # [07]**

To all prospective bidders

Reference is made to the above-captioned tender for which the deadline for submission of offers is **[24/09/2026]** at **[09:30am]**.

Please find a set of clarifications which are construed to form an integral part of the tender document.

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**Question No. [01]:** *RWSCD API specification (Clause 4.2.2.4):*

*Clause 4.2.2.4 states that the detailed API specification of the RWSCD "will be published at a later stage and must be supported by the Solution", and Clause 4.2.2.1 describes the registration mechanism as an example only. At the same time, the technical offer must include sequence diagrams for Registration, PID Secret Key Generation and PID Issuance, which depend on this interface.*

*Could the Contracting Authority:*

*(a) confirm who will publish this API specification, when, and whether it will be binding on the Awarded Bidder*

*(b) make the specification available before the submission deadline - or, if this is not possible, at least an outline of its scope, main operations and the standards it will follow?*

**Answer No. [01]:** a) The purpose of this requirement is to ensure that any external access to, or interaction with, the RWSCD by other system components is facilitated through a properly documented API provided by the awarded bidder as per Section 3, Clause 4.2.3.11.9 'Documentation Requirements'. It is acknowledged that, depending on the architecture proposed by the bidder, the Wallet Instance may be the sole component interfacing directly with the RWSCD. In such cases, no additional external integrations with the RWSCD may be required.

However, where other system components require access to or services from the RWSCD, such access shall be made available through the documented API provided by the awarded bidder to the Contracting Authority as part of Milestone 12 in alignment with Section 2, Article 44.8 which states that “Each Deliverable shall be accompanied by relevant technical information”.

b) Refer to answer a) above.

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**Question No. [02]:** *eID Card and Java Card applet documentation (Appendix II, Clause 4.2.2.2):*

*Appendix II makes the Java Card applet documentation available only after signing an NDA, notes that the card's chip platform and operating system "may be subject to change", and provides sample code which does not cover the mandatory first-time PIN change flow required by Clause 4.2.2.2. Integration with the eID Card at LoA High over PACE/NFC is an early milestone subject to daily penalties.*

*Could the Contracting Authority:*

*(a) confirm that bidders may sign the NDA and receive the applet documentation during the tendering period, and within what timeframe.*

*(b) confirm whether bidders may rely, for the purposes of preparing the offer, on the provided sample code and the APDU Command Set document as reflecting the interface of the eID cards currently in use?*

**Answer No. [02]:**

- a) The Java Card applet documentation referenced in Appendix II will be made available to the awarded bidder subject to signing of the applicable non-disclosure arrangements.
- b) For the purposes of preparing their tender submission, bidders may refer to the sample code and the APDU Command Set document provided by the Contracting Authority as representative of the interface of the eID cards currently in use. However, as per Section 2 Appendix II, “The Contracting Authority has provided sample code solely for illustrative and reference purposes”.

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**Question No. [03]:** *Data centre parameters for hardware sizing (Clause 4.2.3.11.10, Appendix III):*

*Clause 4.2.3.11.10 requires the bidder to supply, install, configure and maintain all hardware in a dual data centre configuration at MITA, using network-attached rack-mounted HSMs. Schedule*

*1 (Hosting Schedule) confirms that MITA provides rack space, power, cooling and network connectivity, but does not quantify them.*

*Could the Contracting Authority provide, for each data centre:*

*(a) the rack space, power capacity and cooling capacity available to the project.*

*(b) the characteristics of the connectivity between the two data centres (bandwidth, latency, redundancy), on which HSM clustering and the 15-minute RPO replication depend.*

*(c) any restrictions on the vendors or models of hardware the bidder may supply?*

**Answer No. [03]:**

a) MITA offers rack space within its 42U cabinets, continuous power and cooling, 24x7 data centre manning, site access and basic physical assistance. Facilities feature redundant UPS-backed power with generator autonomy, controlled air-conditioning, advanced fire suppression, and robust physical security through controlled access and CCTV monitoring, ensuring high availability, safety, and reliability.

b) The two Data Centres are interconnected through dark fibre links deployed over two separate redundant paths, ensuring resilience and high availability.

c) No restrictions are imposed on the selection of vendors or hardware models, provided that the proposed equipment is compatible with standard and existing 19-inch racks, can be accommodated within racks with a maximum depth of 1000 mm already available at the two MITA Data Centres, and complies with standard enterprise power and cooling requirements, without necessitating any special or non-standard power, cooling, or environmental provisions. Notwithstanding the above, the awarded bidder shall remain solely responsible for ensuring that the proposed solution, including the entire supply chain, all associated components, and all hardware and software supplied, fully complies with and satisfies all requirements, obligations, standards, service levels, and performance commitments set out in the Call for Tenders.

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**Question No. [04]:** *Definition of the two Version 1 use cases (Clause 4.2.1.1):*

*Clause 4.2.1.1 requires Version 1 to include at least two daily-life use cases "as determined by the Contracting Authority". These use cases are part of the evaluated technical offer and fall within the six-month Version 1 milestone, for which no extension is possible. The tender does not identify them.*

*Could the Contracting Authority:*

*(a) identify the candidate use cases, or at least the systems to be integrated with, their owners, and the interfaces and protocols involved.*

*(b) if this is not yet decided, confirm on what basis the bidders' proposed use cases will be evaluated?*

**Answer No. [04]:**

a) Section 3, Clause 4.2.1.1 states that “In addition to the age verification functionality, the Awarded Bidder shall also prioritise the integration of at least two (2) high-frequency usage, low-complexity use cases (daily-life use cases), as determined by the Contracting Authority, that demonstrate immediate utility to the end user. The Solution must support ‘out-of-the-box’ templates for common data attributes to minimise integration time for service providers who will make use of the app”. These use cases have not been determined at the time of publication of the tender.

b) Use cases will be evaluated against BPQR criterion 1.1 (c) that states that "the bidder shall provide descriptions of proposed use cases for the mobile application (Version 1) describing technical feasibility, whilst clearly outlining assumptions made, demonstrating familiarity with and relevance to the local context”.

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**Question No. [05]:** *Readiness of eid.gov.mt for PID issuance at LoA High (Appendix I):*

*Appendix I states that eid.gov.mt "is being updated" to add the BirthPlace and Nationality fields required for the mandatory PID data set. PID issuance depends on this update and on LoA High authentication being available to the Solution.*

*Could the Contracting Authority:*

*(a) confirm the planned completion date of this update, relative to the PID issuance milestone.*

*(b) confirm whether a test or staging instance of eid.gov.mt supporting OIDC flows at LoA High, together with test eID cards and the related access codes, will be made available to the Awarded Bidder, and from when.*

*(c) confirm which LoA High authentication flows are currently available in production for mobile applications?*

**Answer No. [05]:**

a) The update is available in the staging environment for integration and testing purposes and is expected to be deployed to production by the end of 2026.

b) The eID test environment is configured to emulate LoA High authentication as closely as possible using digital certificates installed on the workstation. Test/demo Malta eID cards and corresponding CAN will not be provided to bidders prior to tender award stage. Any test or sample

eID cards provided to the awarded bidder will be limited to cards from the current production or issuance batch and will reflect the chip, operating system, application, and technical configuration presently in use.

c) The LoA High authentication flows are currently available in production for web applications accessed from desktop devices using the eID Card. The awarded bidder shall be responsible for implementing the necessary middleware, mobile integration components, and supporting functionality required to enable these authentication flows on mobile devices through the use of the eID Card via NFC, in full accordance with the requirements, specifications, and obligations set out in the Call for Tenders and its Annexes, specifically Section 3, Clause 4.2.2.2 ‘Integration with the Maltese eID infrastructure’.

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**Question No. [06]:** *Q6 - HSM certification requirements (Clauses 4.2.2, 4.2.3.4.1, 4.2.3.11.10):*

*The tender requires network-attached rack-mounted HSMs and compliance with CIR 2024/2979 and CIR 2024/2981, but does not state which certifications the HSMs themselves must hold. Given that the RWSCD protects PID keys under an eID scheme at LoA High, our understanding is that HSMs certified under Common Criteria against EN 419221-5 meet the intended requirement, and that a QSCD listing is not required since qualified signatures are created with the eID Card.*

*Could the Contracting Authority:*

*(a) confirm this understanding, or specify the certifications required.*

*(b) confirm whether MITA requires the use of specific approved vendors or models for the HSM equipment?*

**Answer No. [06]:**

a) The tender requires the proposed solution, including its cryptographic components, to comply with the applicable requirements of Commission Implementing Regulations (EU) 2024/2979 and 2024/2981. Those Regulations do not prescribe a specific HSM certification standard or Protection Profile. Common Criteria certification against an appropriate Protection Profile, including EN 419221-5 where applicable, may constitute relevant assurance evidence for a cryptographic module used for Wallet or trust-service-related functions. However, the Contracting Authority does not confirm that such certification alone will be sufficient in every case. The proposed HSMs shall provide assurance appropriate to their role in protecting cryptographic keys and performing cryptographic operations. The suitability of any HSM certification, including its scope, evaluated configuration, operating assumptions and role within the final Wallet architecture, will be assessed as part of the applicable conformity-assessment and certification process. Tenderers shall therefore

propose HSMs and associated assurance evidence that demonstrably support compliance with the applicable legal and technical requirements

b) The Contracting Authority does not require the use of specific HSM vendors or products. However, the proposed HSM solution must fully comply with the requirements of the Implementing Acts and the standards as specified in the Call for Tenders.

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**Question No. [07]:** *Relying Party volumetrics (Clauses 4.2.3.10.5, 4.2.3.10.6, Appendix III):*

*Appendix III provides volumetric projections for users, PID authentications and electronic signatures, but not for Relying Parties. The sizing of the WRPAC CA, the Relying Party Registrar and the related revocation infrastructure depends on this.*

1. *Could the Contracting Authority provide an indicative projection of the number of Relying Parties expected to register over the contract period?*

*We would be grateful for the Contracting Authority's guidance on the above at the earliest convenience, as the responses may directly affect the preparation and finalisation of our technical and financial offer.*

2. *Request for Extension of the Submission Deadline*

*In addition, we respectfully request that the Contracting Authority consider granting an extension to the submission deadline of the above tender, for the following reasons:*

- ***Complexity of the technical specifications:*** *The tender documentation includes technical requirements of considerable complexity and scope, requiring in-depth review and internal validation to ensure a fully compliant and accurate technical offer.*
- ***Volume of documentation:*** *The extensive volume of Procurement Documents, annexes, and supporting forms requires additional time for careful analysis, cross-referencing, and preparation of all required submissions in accordance with the Instructions to Tenderers.*
- ***Need for coordination with third-party partners:*** *Given the nature and scope of the requirements, our offer necessitates coordination and formal agreements with other economic operators/subcontractors, a process which requires additional time to finalize in a manner consistent with the applicable terms of the tender.*
- ***Sequential Bottlenecks in Architecture Design:*** *Formulating the technical offer requires deep integration design with the eID Card (Appendix II). Because the necessary Java Card applet documentation is gated behind an NDA process, our technical teams face a sequential delay; the architectural design and sequence*

*diagrams cannot be finalized until this administrative process is cleared and the documentation is digested.*

- ***Rigorous Subcontractor & GDPR Due Diligence:*** *The classification of this project under HighRisk Processing of Personal Data requires exhaustive vetting of all proposed subcontractors. Securing formal agreements, validating ISO/IEC 27001 certifications, and completing the comprehensive GDPR Questionnaire for all third parties is a legally intensive process that heavily impacts our preparation timeline.*
- ***Key Expert Sourcing Constraints:*** *The tender demands a discrete team of seven highly specialized Key Experts, explicitly prohibiting any individual from fulfilling multiple roles. Securing exclusive commitments and verifying the stringent experiential requirements for this entirely non-overlapping team requires an extended recruitment and validation phase.*

*We believe that a reasonable extension would allow all interested economic operators to submit offers of higher quality and completeness, ultimately serving the Contracting Authority's interest in receiving well-prepared, competitive bids.*

*We would therefore kindly **request an extension of at least 4 weeks, so the new submission deadline to be no earlier than the 1st of October 2026 (01/10/2026).***

*We remain at your disposal for any further information you may require, and we thank you in advance for your consideration of this request.*

*Yours faithfully,*

**Answer No. [07]:**

a) The Tender document does not provide a separate projection for the number of Wallet Relying Parties expected to register over the contract period. Bidders are expected to design, size and dimension their proposed solution based on the volumetrics and capacity requirements specified in Appendix III. Any assumptions concerning the number of Wallet Relying Parties should be reasonable, proportionate to that volumetrics, and consistent with the intended national deployment of the EUDIW Solution, whilst keeping in mind the obligations set out in Article 5(f) of the [EUDIW Regulation].

b) Prospective bidders are to refer to Clarification Note 02, published as part of this tender.

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All other tender documents, conditions and requirements, which are not superseded by this clarification remain in place.

**Department of Contracts**