



[03/09/2026]

[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 # [17]

To all prospective bidders

Reference is made to the above-captioned tender for which the deadline for submission of offers is **[15/10/2026]** at **[09:30am]**.

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

Question No. [01]: *Clarification Set 3*

6 6.1 Several Key Expert roles require involvement in projects "worth over €1 million" or "worth over €2 million". Does the project value refer to the total contract value, the value of the expert's work package, or another measure?

6 6.1 Where a Key Expert has participated in several qualifying projects, is it sufficient to provide a single qualifying project reference, or is the Contracting Authority seeking evidence from multiple projects?

5 5.1 The Terms of Reference state that some Key Experts will be required to be physically present in Malta when necessary. Could the Contracting Authority clarify which Key Expert roles are expected to be resident or regularly present in Malta during implementation and support?

14 14.7 Does Malta plan to open-source parts of the solution beyond the EUDIW requirement for the wallet App?

All Which version of the ARF is referenced by the tender?

Appendix III Volumetrics Are the projected user numbers and transaction volumes planning assumptions only, or should bidders guarantee performance at these volumes as part of the contractual service levels?

Answer No. [01]: In Section 3, Clause 6.1.1 “project worth over €1 million” refers to the total contract value of the project.

In Section 3, Clause 6.1.1 the applicable minimum requirement is of one project. In the BPQR Criteria 1.7 (f), one (1) add-on mark is awarded if the key expert has “been involved in technology and trust services for at least two related project worth over €1 million, indicating the roles performed on this project.”

Section 3, Clause 5.1 indicates that “Some of the Awarded Bidder’s Key Experts, as well as personnel responsible for operational activities, will be required to be physically present in Malta during implementation of the contract as required for operation and maintenance purposes, to attend meetings and address a crisis or major issues.” In particular, as per Section 3, Clause 6.1.1 Key Expert 7: One (1) Systems and Network Engineer states that “The Systems and Network Engineer, who will be based in Malta, will contribute to operational readiness through documentation, runbooks and knowledge transfer and should work closely with other engineers to ensure alignment with the overall Solution architecture”. With regards to Key Expert 1 - Project Manager, as per BPQR criteria, 1.7(a) additional marks will be awarded if “based in Malta for the duration of the project”.

Section 2, Article 14.6 states that “The Contractor hereby assigns to the Contracting Authority, with full title guarantee, all intellectual property rights in all Bespoke Deliverables, including all present and future copyright, database rights, and related rights. This assignment is effective at the moment of creation of each Bespoke Deliverable and covers without limitation: Wallet Provider, PID Provider, Relying Party Registrar, Signing Certificate Provider (PKI), WPRAC Provider, RP Verification Component and the Wallet Instances. The Contractor shall execute all documents required to give effect to this assignment.”

As per List of Abbreviations and References, [ARF] refers to “Architecture and Reference Framework v2.4”.

As per Appendix III, “These volumetric projections are intended to inform capacity planning and ensure the solution’s scalability and performance throughout its lifecycle.”

Question No. [02]: Clarification Set 4

1,2 and 3 Ref: Section 1 (Introduction, Milestones 9 and 15), Section 2 Clauses 1.3, 14.6, 14.7, Section 3 Clauses 4.2.1.3.6, 4.2.3.4.3, 4.2.3.10.1

Identification of verification-related components

Document refers to verification-related components under five different labels, without stating how many distinct components exist or how they relate:

(i) 'Verification Engine' (4.2.1.3.6) – delivered with source code to Relying Parties that are Public Bodies, to validate credentials presented by Maltese and other Member State Wallets; (ii) 'RP verifier component' (4.2.3.4.3) – stated to be part of the Wallet Unit, verifying Relying Party authenticity; (iii) 'WUA verifier component' (4.2.3.10.1) – used by the PID Provider to verify WUA authenticity; (iv) 'RP Verification Component' (14.6, 14.7) – a Bespoke Deliverable subject to full IP title assignment, and Milestone 9; (v) 'credential verification engine' (1.3) – listed within the 'Orchestration Layer'; (vi) 'the verifier components' (plural, undefined) – three generic references in the Section 1 introduction and Milestone 15.

As (ii) resides inside the Wallet Unit while (i) is delivered externally, it is unclear whether (iii)–(vi) are the same components renamed, additional components, or sub-parts of one component.

Clarify:

- a) The total number of distinct verification-related components required;*
- b) For each, which of the labels (i)–(vi) refers to it, so a single unambiguous name can be used;*
- c) For each, whether it must be a standalone application or service in its own right, or is to be delivered as an integral part of another application – for example, whether the 'RP Verification Component' (14.6/14.7, Milestone 9) is the same object as the 'RP verifier component' (4.2.3.4.3) and is therefore delivered within the Wallet Unit rather than separately; and*
- d) For each, whether it resides within the Wallet Unit, is delivered externally to Relying Parties, or forms part of the backend Orchestration Layer.*

Answer No. [02]:

a) Three, see answer (b) below

b) There are three different verification components as follows:

- One verification component that is part of the Wallet Instance and is referred to as 'RP Verification Component' and 'RP verifier component' within the CfT as per
 - Section 2, Articles 14.6, 14.7, 18.2
 - Milestone 9
 - Section 3 Clause 4.2.3.4.3
- One verification component that is part of the PID provider component and is referred to as 'WUA Verifier component' in Section 3, Clause 4.2.3.10.1.
- One verification component labelled as 'Attestation Verifier Component' in Figure 1 that is external to both the Wallet Instance and the PID provider as per Section 3 Clause 4.2.1.3.6 "Furthermore, to ensure interoperability and trust across Member States, the awarded bidder is required to deliver a Verification Engine, including its complete source code, which will be made

available to Relying Parties that are Public Bodies. This engine must enable the validation of credentials presented to Relying Parties by both Maltese and other Member State Wallets, thereby supporting cross-border recognition and compliance with EU standards.”

The Awarded Bidder is to ensure that it reaches Milestone 15 where it successfully “Integrate and deploy the EUDIW Solution with the necessary exchanges between the Wallet Provider, Signing Certificate Provider, Wallet Relying Party Access Certificate Authority, PID Provider, Relying Party Registrar and Wallet Solution including the verifier components and SCA attaining a fully compliant EUDIW Solution.” This means that the WUA verifier component and the RP verifier component/RP verification component have been successfully integrated and deployed as part of the PID provider component and Wallet Instance respectively. Moreover, the Awarded bidder is expected to finalise and deliver the submission of the Third verification component – Attestation Verifier Component as mentioned in Section 3 Clause 4.2.1.3.6.

c) The RP Verification component / RP verifier component is part of the Wallet Instance and not a standalone application. The WUA verifier component is part of the PID provider component and not a standalone application. The verification engine defined in Section 3, Clause 4.2.1.3.6 ‘Attestation Verifier Component’ is a standalone component including the complete source code, such that it can be integrated by Public Bodies in other applications.

d) Refer to answer (b) above. For clarity, the answers provided should not, however, be construed as limiting the bidder’s responsibility to include any other components that may be required for the proper functioning and delivery of the solution in line with the specified requirements.

Question No. [03]: *Clarification Set 5*

*2 and 3 Ref: Section 2 Clauses 14.5, 14.6 and 14.7, Section 3 Clauses 4.2.1.1 and 4.2.1.3.6
IP, source-code obligations and Version 1 applicability of the verification components*

The Tender Document refers to verification-related components under several labels: the 'Verification Engine' (Clause 4.2.1.3.6), the 'RP verifier component' (Clause 4.2.3.4.3), the 'WUA verifier component' (Clause 4.2.3.10.1), the 'RP Verification Component' (Clauses 14.6 and 14.7, and Milestone 9) and the 'credential verification engine' (Clause 1.3).

Of these, Clauses 14.6 and 14.7 name only the 'RP Verification Component' among the Bespoke Deliverables subject to full IP title assignment and source-code delivery at every release, while Clause 4.2.1.3.6 separately requires the 'Verification Engine' to be delivered with its complete source code to Relying Parties that are Public Bodies.

Could the Contracting Authority please confirm:

a) Whether the IP ownership regime and the source-code delivery and escrow obligations set out in Clauses 14.5–14.7 apply to all of the components listed above, or only to the 'RP Verification Component' expressly named in Clauses 14.6 and 14.7;

- b) How the obligation in Clause 4.2.1.3.6 to make the Verification Engine available to Relying Parties that are Public Bodies relates to the IP assignment and escrow regime of Clauses 14.5–14.7, and under which licence such source code is to be released to those Relying Parties, including whether those Relying Parties may further redistribute it; and*
- c) Whether any of these components are required from Version 1 (age verification and the initial use cases), or whether all of them are scoped exclusively to Version 2, noting that Clause 4.2.1.3.6 sits within Clause 4.2.1.3 'Requirements common to Version 1 and Version 2' while its wording refers to credentials presented by Wallets.*

Answer No. [03]:

- a) There are three verification components:
- One verification component that is part of the Wallet Instance and is referred to as 'RP Verification Component' and 'RP verifier component' within the CfT as per Section 2 Article 14.6, Section 2 Article 14.7, Section 2 Article 18.2 – Milestone 9 and Section 3 Clause 4.2.3.4.3.

Full ownership as described in Section 2 Article 14.7.

- One verification component that is part of the PID provider component and is referred to as 'WUA Verifier component' in Section 3 Clause 4.2.3.10.1.

Full ownership as stipulated for the PID component in Section 2 Article 14.7.

- One verification component labelled as 'Attestation Verifier Component' in Figure 1 that is external to both the Wallet Instance and the PID provider as per Section 3 Clause 4.2.1.3.6 "Furthermore, to ensure interoperability and trust across Member States, the awarded bidder is required to deliver a Verification Engine, including its complete source code, which will be made available to Relying Parties that are Public Bodies. This engine must enable the validation of credentials presented to Relying Parties by both Maltese and other Member State Wallets, thereby supporting cross-border recognition and compliance with EU standards."

The intent is to provide Public Bodies the verification engine that they can integrate within their own applications, therefore the Awarded Bidder is either to provide as a bespoke deliverable and therefore provide full ownership or else provide under perpetual license to fulfil both Section 2 Article 14.7 and Section 3 Clause 4.2.1.3.6.

- b) Refer to (a) above
- c) The RP Verification Engine, WUA verifier component, and the attestation verification components are only in scope for Version 2. Section 3 Clause 4.2.1.3.6 applies specifically to Version 2 "In the case of Version 2, the EUDIW Solution provided must be fully capable of supporting the use case scenarios as outlined in the Architecture Reference Framework. To facilitate an accelerated integration process, the awarded bidder shall, at the earliest

opportunity following the deployment of the Solution on the staging environment, provide a comprehensive Technical Integration Document. This document must detail the APIs necessary for seamless integration by Relying Parties to the EUDIW. In addition, the awarded bidder shall offer dedicated technical support and guidance to the Contracting Authority and its partners throughout the onboarding process.

Furthermore, to ensure interoperability and trust across Member States, the awarded bidder is required to deliver a Verification Engine, including its complete source code, which will be made available to Relying Parties that are Public Bodies. This engine must enable the validation of credentials presented to Relying Parties by both Maltese and other Member State Wallets, thereby supporting cross-border recognition and compliance with EU standards.”

Question No. [04]: Clarification Set 6

3 Ref: Clauses 4.1.4 (definitions 19 and 20), 4.2.3.10.5, and Figures 1 and 2

WRPAC subscribers: inconsistency between the text and Figures 1 and 2

Clause 4.1.4 defines the WRPAC Provider as "a component that issues WRPAC to Relying Parties registered in that Member State", and Clause 4.2.3.10.5 lists WRPACs (item d) separately from the signing certificates issued to the PID Provider (item a), the Wallet Provider (item b) and the Registrar (item c).

Figures 1 and 2, however, show WRPAC objects attached to the Wallet Provider, the PID Provider and the EAA Provider, with certificate-delivery arrows drawn from the WRPAC Provider to each of them. This is not supported by the text of the Tender Document, and appears inconsistent with the name and stated purpose of the component.

Could the Contracting Authority please confirm:

- a) Which subscriber categories the WRPAC CA is required to serve;*
- b) Whether the WRPAC objects shown on the Wallet Provider and the PID Provider in Figures 1 and 2 are intended to denote WRPACs, or rather the signing certificates referred to in Clause 4.2.3.10.5 (a) and (b); and*
- c) Whether WRPACs are to be issued per registered Relying Party or per Relying Party Instance, as this materially affects the volumetric dimensioning of the PKI.*

Answer No. [04]:

- a) The WRPAC CA shall support all Relying Parties and other authorised entities requiring access to the wallet, including for wallet management, the issuance of claims, and the retrieval of information from the wallet, as represented in Figure 2.
- b) The WRPAC objects represent WRPACs only and shall not be interpreted as replacing, superseding, or removing the requirement for dedicated signing certificates for the relevant components identified in Figures 1 and 2, including the Wallet Provider and the PID Provider.
- c) The WRPACs shall be issued for each Relying Party Instance.

Question No. [05]: Clarification Set 6

3 Ref: Clauses 4.2.1.1, 4.2.1.3.3, 4.2.1.3.6

Trust mechanism and relying-party side software for Version 1 attestations

Version 1 issues a cryptographically secured ProofOfAge attestation which is subsequently presented to relying parties. The Tender Document does not, however, specify a trust mechanism by which a relying party can establish the authenticity and validity of that attestation — no signing certificate hierarchy, trusted list, publication point or validation interface is described for Version 1. In addition, the only provision addressing the relying party side of Version 1 is the requirement in Clause 4.2.1.1 that the Solution "must support 'out-of-the-box' templates for common data attributes to minimize integration time for service providers who will make use of the app". Could the Contracting Authority clarify:

- a) What trust and validation mechanism is expected for Version 1 attestations;*
- b) Whether the bidder is expected to propose, deliver and operate such a mechanism as part of Version 1;*
- c) Whether, in addition to the mobile application, the bidder is required to develop and deliver any further software for the relying party side of Version 1 — such as a verifier application, a verification service, an SDK or a library enabling a relying party to validate a presented ProofOfAge attestation — or whether the 'out-of-the-box templates' referred to in Clause 4.2.1.1 are intended to constitute the entirety of that obligation, with each relying party implementing validation itself;*
- d) If such further software is required, whether it is expected to be the same deliverable as the 'Verification Engine' of Clause 4.2.1.3.6, or a separate Version 1 specific component; and*
- e) What, if any, interoperability requirement applies to Version 1 attestations beyond the Maltese national context, given that Clause 4.2.1.1 states Version 1 "may not necessarily be compliant with the [EUDI Regulation]".*

Answer No. [05]:

a) In accordance with Section 3 Clause 4.2.1.1 and BPQR criterion 1.1 (a): “the bidder shall provide a technical architecture and supporting documentation (including write-up and e.g. flowcharts, standards compliance matrix) evidencing the proposed design of the mobile application (Version 1) and implementation of authentication with Malta’s national eID infrastructure, privacy-preserving age verification and use cases (mandatory).” Moreover, as per BPQR add-on criterion 1.1 (f) and in accordance with Section 3 Clauses 4.2.1.1 and 4.2.1.3.3, “the bidder shall show how the age verification will be implemented in a way that is as conformant as possible with the latest version of the harmonised Age Verification solution blueprint developed by the European Commission, and that makes it as viable as possible to reuse in Version 2”.

b) Yes is expected to propose, deliver and operate such a mechanism.

c) No. When 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” it refers to the issuance of these use cases, not verification.

d) Such further software is not required.

e) As per Section 3, Clause 4.2.1.1 ‘Version 1 - Malta’s national mobile application for storing digital documents’, “This mobile application may not necessarily be compliant with the [EUDI Regulation] but will leverage existing infrastructure where possible, to provide citizens and residents access to a secure mobile app in the shortest timeframe possible”. As per BPQR 1.1 (b) “the bidder shall describe all proposed functions (frontend and backend), interactions and capabilities in a clear and comprehensive manner (mandatory)”.

Question No. [06]: *Clarification Set 7*

1, 2 and 3 Ref: Clauses 4.2.1.1, 4.2.3.11.8, BPQR criterion 1.1(d), Section 2 Article 18.2

Coexistence of Version 1 and Version 2

Clause 4.2.1.1 requires Version 1 to be operated, maintained and supported; BPQR criterion 1.1(d) requires a changeover plan "in a way for the functionality of Version 1 to be available in Version 2 from first release"; and the seven-year Build, Operate, Maintain and Support period runs "from the date of commissioning of the Version 1". Could the Contracting Authority confirm whether Version 1 is expected to remain in production in parallel with Version 2 for the remainder of the contract, or whether it is to be decommissioned and withdrawn from the official app stores upon go-live of Version 2 — and, if it is to be decommissioned, at what point the hosting, operation, maintenance and support obligations in respect of Version 1 cease?

3 and Appendix II Ref: Clause 4.2.2.2 and Appendix II

Test eID Cards for development

The Solution must interface with the JavaCard applet on the eID Card via the PACE protocol over NFC, and must support first-time electronic use of the card including the mandatory initial PIN change process. Could the Contracting Authority confirm whether test eID Cards will be made available to the Awarded Bidder for development and testing purposes — including, where applicable, cards in pre-personalised and un-activated states so that the first-time-use and PIN-change flows can be tested — in what quantity, at what point in the project, and whether access to a test instance of the card management environment will also be provided?

Answer No. [06]: As per Section 3, Clause 2.2, the Awarded Bidder shall “Support in the transition from Version 1 to Version 2, providing a user-friendly experience when migrating to Version 2.” As per Section 2, Article 18.2 “The Contracting Authority reserves the right to extend the contract or part thereof by up to six (6) months at no extra cost, such that the extension does not delay the

completion of Milestone 16 by more than six (6) months. No extensions are possible for Milestones 1 and 3. If an extension is granted, the hosting, operation, maintenance and support related to Version 1 shall be at the same rates and terms.” Version 1 will be decommissioned as part of this transition. As per Section 3, 1.1 (d) and in accordance with Section 3 Clause 4.2.1.1, “the bidder shall provide a plan, which includes both technical and UX aspects, for a smooth changeover from Version 1 to the EUDIW Solution (Version 2) in a way for the functionality of Version 1 to be available in Version 2 from first release.”

Test/demo Malta eID cards and corresponding CAN will be provided to the Awarded Bidder following signature of the contract. 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. There are currently no test mode/sandbox environment available to bidders to access demo functionalities. Further details such as quantity of test eID cards will be discussed with the awarded bidder post contract award.

Question No. [07]: *Clarification Set 8*

Appendix I Ref: Appendix I

Completion of the eid.gov.mt data set extension

Appendix I states that "the eid.gov.mt system is being updated to ensure that the data set complies in full with the mandatory requirements of the PID, by introducing the fields for BirthPlace and Nationality". As PID issuance in Version 2 depends on the availability of these attributes, could the Contracting Authority indicate the expected completion date of this update, and whether the new fields will be available in a test environment in advance of the production release?

3 Ref: Clause 4.2.1.3.4

Existing Government of Malta branding framework

The Contractor is responsible for the design and ongoing update of the Solution's branding and is required to submit a minimum of five proposals for the Contracting Authority's approval. Could the Contracting Authority confirm whether an existing Government of Malta brand book, visual identity manual or style guide applies as a governing framework for this work, and if so whether it will be made available to bidders or to the Awarded Bidder?

Answer No. [07]:

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.

The Contracting Authority's intention is to establish an independent visual identity. No specific Government-wide master brand guidelines or common design system are being mandated as part of this procurement. However, the branding shall remain appropriate for a national project and as per Section 3, Article 4.2.1.3.4 “The awarded bidder is to consult continuously with the Contracting Authority, providing a minimum of five proposals. The Contracting Authority has final say on the branding chosen”.

Question No. [08]: Clarification Set 9

2 and 3 Ref: Section 3 Clauses 4.2.1.1 and 4.2.1.3.6; Section 2 Article 18.2 The Tender Document provides that additional digital services will be added "as needed based on national priorities and obligations arising from EU legislation", that the Contracting Authority "will inform the Awarded Bidder of which use cases will be implemented and their respective timelines", and that a minimum of 20,000 Person Hours is to be allocated to their implementation. Could the Contracting Authority kindly indicate, even at a high level:

- a) Whether there is an anticipated cadence or milestone-linked schedule for communicating these use cases — for example at defined project milestones or on a quarterly basis;*
- b) The expected nature of these use cases — in particular whether they are expected to consist of the presentation of attributes already contained in the PID, or to require the issuance of new attestation types (and therefore new Attestation Rulebooks and attestation schemes), the onboarding of additional Authentic Sources, or integration with systems outside the Contracting Authority's control; and*
- c) Whether they are expected to be of a complexity comparable to the "high-frequency usage, low-complexity use cases (daily-life use cases)" referred to in Clause 4.2.1.1 for Version 1, together with an indicative number of use cases foreseen over the contract period.*

We understand that a definitive list and firm dates may not yet be available at this stage.

Answer No. [08]:

a) As per Section 3, Clause 4.1.1 “For both phases, the Contracting Authority is seeking to introduce additional digital services, with these new use cases being added as needed based on national priorities and obligations arising from EU legislation.” As per Section 3, Clause 4.2.1.3.6 “The Contracting Authority is committed to rapidly promoting the uptake of Version 1 and Version 2 and expects the awarded bidder to actively support this strategic objective. The Contractor shall support and contribute to the adoption of key additional digital services that will act as flagship use cases for Version 1 and Version 2, demonstrating added value and functionality to citizens, residents and service providers. These services will serve as the primary drivers of adoption and visibility, and their successful integration will be critical to the overall rollout strategy. The Contracting Authority will inform the Awarded Bidder of which use cases will be implemented and their respective timelines.”

b) The expected nature of these use cases many require the issuance of new attestation types and integration with systems outside the Contracting Authority's control as per Section 3, Clause 4.1.1.

c) As per Section 3, Clause 4.1.1 “the Contracting Authority is seeking to introduce additional digital services, with these new use cases being added as needed based on national priorities and obligations arising from EU legislation.” The number of use cases over the period of the contract will also reflect the number of development hours as per Section 3, Clause 4.2.1.3.6 that states

“The Awarded Bidder is expected to allocate a minimum of twenty thousand (20,000) Person Hours in development services for implementing these use cases. Usage of these hours or part thereof will be agreed upon between the Contracting Authority and the Contractor on a case-by-case basis, including delivery deadlines, except for where otherwise stated in the Section 2, Article 18.2”.

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

Department of Contracts