

The EDPB's Guidelines 02/2025 on processing of personal data through blockchain technologies (Version 1.1), while aiming to protect personal data under GDPR, appear to apply a framework ill-suited to the fundamental nature of public blockchain technology. By demanding mutability from immutable systems, favoring centralized (permissioned) models, imposing heavy compliance burdens, and seemingly misunderstanding the core value propositions of decentralization, the guidelines risk:

- Being practically unenforceable in many key scenarios (public chains).
- Stifling crucial Web3 innovation within Europe.
- Pushing Europe further behind in a critical technological race.
- Undermining the potential of blockchain as a tool for transparency and user empowerment, instead forcing it into familiar, centralized patterns.

The guidelines seem poised to create significant barriers for the very technologies (like Ethereum) that represent the forefront of blockchain development, based on a regulatory approach that doesn't fully grasp the paradigm shift these technologies represent.

For the sake of transparency and public accountability regarding the development of Guidelines 02/2025, which carry significant implications for technology and innovation in Europe, I request that the EDPB publish the composition of the working group or task force primarily responsible for drafting these guidelines. Understanding the range of expertise and perspectives that contributed to this document is crucial for evaluating its foundation and potential impact.