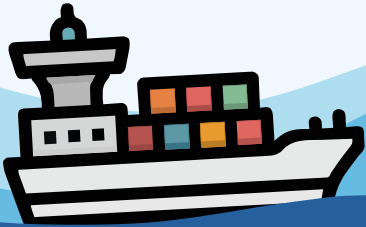


Prepared by DigitalTrade4.EU



Response to the Public Consultation on Connecting Europe Facility 2014-2020 – Evaluation

May 2025

About Us

The **DigitalTrade4.EU consortium** envisions a **seamlessly interconnected Europe** and **neighbouring regions** powered by harmonized standards for the digitalisation of trade documents and processes. By fostering the digital transformation of trade, we aim to promote economic integration, enhance cooperation, and ensure long-term trade facilitation across borders.

Our consortium is made up of **experts in their field**, including **105 full partners**—trade associations, logistics providers, shipping lines, banks and insurances, technology innovators, etc.—**from 17 European Union countries** (*France, Belgium, Netherlands, Austria, Estonia, Finland, Italy, Latvia, Spain, Germany, Sweden, Poland, Luxembourg, Lithuania, Slovenia, Denmark, Bulgaria*) and **22 non-EU countries** (*United Kingdom, Switzerland, Montenegro, Japan, Singapore, Hong Kong, Australia, New Zealand, India, Nepal, Canada, United States of America, Cameroon, Morocco, Egypt, Kenya, Pakistan, Nigeria, Brazil, Uzbekistan, Turkey, Ukraine*).

Our consortium is already **aligned with the fundamentals** of the **EU Competitiveness Compass**. Learn more:

- How DigitalTrade4.EU Can Help Achieve the Objectives of the EU Competitiveness Compass (February 2025)

<https://www.digitaltrade4.eu/how-digitaltrade4-eu-can-help-achieve-the-objectives-of-the-eu-competitiveness-compass/>

Web page: www.digitaltrade4.eu

EU Transparency Register: 355266197389-94

Contact person: Riho Vedler

Email: riho.vedler@ramena.ee



Executive Summary

The **Connecting Europe Facility's (CEF)** foundational mission of funding **cross-border transport** and **digital networks** is pivotal for achieving core **EU objectives**. This aligns with the **DigitalTrade4.EU agenda** for **interoperable, green trade corridors**, which directly supports CEF's goals of fostering **economic, social, and territorial cohesion** and contributing to a more **competitive social market economy**, as highlighted in the **CEF1 & CEF2 evaluation framework**.

To enhance CEF's future **effectiveness, relevance, and EU added value**, we recommend a strategic broadening of its **geographical scope** to selected **Asia–Africa projects**.

This expansion should be conditional upon strict **EU partnership agreements** and adherence to **EU standards** (such as **Digital Product Passports (DPPs)**, **eIDAS 2.0**, and **GDPR**), thereby leveraging CEF as a tool to export **EU regulatory models and norms**.

Furthermore, embedding CEF within established and emerging **global frameworks** and strategic initiatives like **DEPA**, **UNECE Rec.49**, and the **Global Gateway initiative** will significantly enhance **coherence** with EU external policies and reinforce **EU-style digital and sustainability standards internationally**. This approach directly addresses the evaluation's focus on **EU added value** by promoting **cross-border cooperation** and leveraging **EU expertise** on a global scale, turning strategic roadmaps for **digital and green trade** into tangible outcomes.

*This document is part of the **DigitalTrade4.EU** input to the **European Commission** regarding the **International Digital Strategy**¹, the **Multiannual Financial Framework (MFF)**², and the **Industrial Decarbonisation Accelerator Act - speeding up decarbonisation**³.*

¹ European Commission. International Digital Strategy, Call for evidence

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14589-International-Digital-Strategy_en

² European Commission. EU's next long-term budget (MFF) – implementing EU funding with Member States and regions, Public Consultation

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14520-EUs-next-long-term-budget-MFF-implementing-EU-funding-with-Member-States-and-regions_en

³ European Commission. Industrial Decarbonisation Accelerator Act - speeding up decarbonisation, Call for evidence

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14505-Industrial-Decarbonisation-Accelerator-Act-speeding-up-decarbonisation_en

Background

The Connecting Europe Facility (CEF) **2014-2020** was instrumental in **co-financing core TEN-T transport and digital infrastructure**. Its primary objectives included **removing bottlenecks, building missing links, enhancing cross-border sections**, and fostering **rail interoperability**, alongside meeting **EU climate targets**. In the digital sector, CEF1 focused on **interoperability, connectivity**, and the **sustainable deployment of trans-European digital service infrastructures**.

The ongoing **ex-post evaluation**, as outlined in the **Call for Evidence**, will critically assess CEF1's performance against its specific objectives stated in **Article 4 of the CEF1 Regulation**. This includes its **effectiveness** in achieving improved **connectivity and interoperability**, the removal of **bottlenecks**, and enhancing **sustainability**; its **efficiency** in terms of costs and benefits; its continued **relevance** to policy objectives; its **coherence** with other EU policies and funding instruments like **Cohesion Policy Funds** and **Horizon 2020**; and the overall **EU added value** compared to what Member States could achieve independently, particularly in improving **cross-border cooperation**.

Concurrently, **EU trade policy** has shifted toward **digital and green models**. The **EU–Singapore Digital Trade Agreement (DTA) (2023)**⁴ highlights **cross-border data flows** and **e-commerce rules**, complementing **CEF Digital's mandate**. At the same time, proposals like **DEPA** and the UNECE **“Transparency at Scale” Recommendation 49**⁵ promote **interoperable electronic trade documents** and mandatory **DPPs**. Strategic roadmaps, such as those focusing on **EU Green-Digital Trade Leadership** and **Digital Trade & Capital Markets Integration**, further detail this convergence on priorities like **digital identity, carbon passports, trustable data**, and **harmonized e-document laws**, all of which align with **CEF's transport and digital objectives** and underscore the need for its continued evolution.

⁴ European Commission. The EU-Singapore agreements explained https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/singapore/eu-singapore-agreements/agreements-explained_en

⁵ United Nations Economic and Social Council. Recommendation No. 49: Transparency at Scale – Fostering Sustainable Value Chains (March 2025) <https://unece.org/sites/default/files/2025-05/ECE-TRADE-C-CEFACT-2025-03E.pdf>

Strategic Alignment

- **Digital Infrastructure & Interoperability (aligning with CEF Effectiveness & Relevance):** The EU–Singapore Digital Trade Agreement (DTA) prioritizes **seamless cross-border data flows, e-signatures, and cybersecurity**. This directly aligns with **CEF Digital’s strategic objective** of modernizing **trans-European digital networks** and promoting **interoperability and connectivity**. Initiatives detailed in strategic roadmaps, such as the harmonization of digital standards (**MLETR/eIDAS 2.0**) and the establishment of an **EU Trade Document Registry (ETDR)**, would be significantly bolstered by **CEF support**, demonstrating the effectiveness of such investments. Frameworks like **MLETR** and **eIDAS 2.0** establish the legal foundation for **electronic trade documents**, facilitating the interoperable digital infrastructures that **CEF Digital** seeks to support and fund. The continued need for such modern digital infrastructure, enabling **cross-border recognition** of **e-documents** and **digital identities**, underscores the sustained relevance of **CEF Digital's mission**.
- **Sustainable Transport & Green Logistics (aligning with CEF Effectiveness & EU Climate Objectives):** **Digital Product Passports (DPPs)** and **carbon-accounting tools**, central to the **DigitalTrade4.EU strategy** and detailed in **green-digital trade roadmaps**, directly reinforce **CEF Transport’s objective** of fostering **cleaner, interoperable transport infrastructure**. Implementing **DPPs** for **traceable, sustainable supply chains** and piloting **CBAM-DPP corridors** to link trade finance with verifiable **ESG metrics** are key activities **CEF can support**. This contributes significantly to the EU's priority of **sustainable growth** and the attainment of **climate change objectives**, a key aspect of the **CEF evaluation**. Embedding **IoT-based tracking**, linking CEF projects to **green finance mechanisms** (e.g., **CBAM rebates, InvestEU guarantees** for green trade), and supporting the **digitalisation of tax and customs interfaces** would further magnify the programme’s effectiveness in contributing to **decarbonisation** and efficient, sustainable logistics.
- **Global Partnerships & Funding (aligning with CEF Coherence & EU Added Value):** The proposal to allocate **~€2 billion** under **NDICI-Global Europe** for **digital corridors**

in Asia, as outlined in strategic roadmaps, mirrors CEF's cross-border connectivity ethos but suggests expanding beyond EU/EEA boundaries. CEF can play a crucial role in funding secure digital corridors and supporting global digitalisation projects that adhere to EU standards. EU-Asia TradeTech Sandboxes and DPP pilots (e.g., for Singapore electronics) could showcase how CEF funds can enhance global connectivity and interoperability while adhering to EU standards, thereby increasing EU added value and coherence with external policies like the Global Gateway.

Policy Recommendations

Recommendation 1: Broaden and Deepen Geographical Scope with Strategic Digitalisation Projects to Enhance EU Added Value and Global Relevance. To amplify CEF's EU added value and global relevance, we recommend extending its geographical scope to strategic projects in key regions like Asia and Africa, focusing on scaling up co-funded digitalisation initiatives. Examples include supporting ASEAN digital customs systems, sustainable rail corridors, and projects that deploy EU technical frameworks globally.

Conditionality for Effectiveness and Coherence: This expansion must be strictly conditional on:

- **EU Partnerships:** Involvement of EU public/private stakeholders (e.g., CINEA-managed grants, EU technology firms, DG MOVE/CINEA oversight) to ensure alignment with EU expertise and project management standards. This directly addresses the evaluation's interest in governance and management by the Commission and executive agencies.
- **Adherence to EU Standards:** Application of EU norms such as Digital Product Passports (DPPs), GDPR, eIDAS 2.0, and environmental standards. This ensures that CEF funding actively promotes EU regulatory models globally, a clear demonstration of EU added value and coherence with EU's broader policy objectives, ensuring global digital transformation aligns with EU regulatory, interoperability, and sustainability goals.

Such conditional expansion would not only open new markets but also allow the EU

to proactively shape **global infrastructure** and **digital standards**, reinforcing its role in **international economic diplomacy**.

Recommendation 2: Enhance Synergies with Global Initiatives for Greater Coherence and Effectiveness. To maximize coherence and effectiveness, CEF should systematically align with significant **global trade and connectivity initiatives**:

- **CEF Digital:** Projects funded under CEF Digital should be designed for interoperability with frameworks like **DEPA's Green Trade Hub** and **UNECE digital credentials standards** (e.g., **Recommendation 49 on Transparency at Scale**). This ensures that CEF investments contribute to **open, platform-neutral ESG tracking, seamless international digital trade**, and the globalization of **EU sustainability standards** for supply chains, supporting the objective of improved **connectivity and interoperability**.
- **CEF Transport:** Investments should be coordinated with the EU's **Global Gateway strategy**, particularly for corridors in **Central Asia and Africa**. This strategic alignment will foster the development of **climate-resilient transport infrastructure** that seamlessly integrates with existing and future **EU-funded networks**, enhancing the effectiveness of both **CEF** and **Global Gateway** in building sustainable global connections.

Recommendation 3: Strengthen SME Engagement to Boost Relevance, Efficiency, and Inclusive Growth. To ensure CEF projects are relevant and efficiently implemented, and to promote inclusive growth, dedicated funding within CEF (potentially in synergy with programs like **COSME**) should be allocated for **upskilling SMEs** and local partners. Training, potentially through initiatives like a "**Green-Digital Trade Academy**" as envisioned in strategic roadmaps, should focus on practical implementation of new requirements such as **Digital Product Passports (DPPs)**, **electronic freight transport information (eFTI)**, and broader **green compliance measures**. Developing **SME-friendly compliance frameworks** with tiered thresholds is also crucial. Equipping **SMEs**, which form the backbone of the **EU economy**, with these digital trade tools is vital. This addresses potential barriers to adoption, increases project uptake, and ensures that the benefits of CEF investments are widely distributed, enhancing the overall **effectiveness** and **EU added value** of the programme.

Recommendation 4: Leverage EU Standards for Enhanced EU Added Value through Co-financing. Use CEF co-financing as a strategic tool to export EU regulatory models (e.g., carbon tracking via CBAM, eIDAS 2.0 identity, DPPs for sustainable supply chains) through international projects. By making EU rules benchmarks for sustainability and digital governance – for instance, by piloting CBAM-DPP corridors or advancing UNECE transparency protocols – these projects deliver clear EU added value that single countries or markets couldn't achieve alone. Highlighting CEF's role in scaling EU regulatory models globally through projects involving non-EU countries is paramount for reinforcing the EU's position as a global leader in digital governance and sustainable economic diplomacy.

Recommendation 5: Explicitly Frame Future Projects Against CEF Evaluation Criteria. To ensure future iterations of CEF continue to deliver maximum impact, all project proposals, particularly those involving new geographical areas or complex partnerships, should explicitly articulate how they address the core CEF evaluation criteria:

- **Effectiveness:** Clearly define expected outcomes, such as measurable improvements in connectivity, interoperability, removal of bottlenecks, or contributions to sustainability and security of supply.
- **Efficiency:** Demonstrate a strong cost-benefit analysis and outline measures for streamlined project management and potential for regulatory simplification.
- **Relevance:** Justify the project against current and evolving EU policy objectives and identified infrastructure/digital needs, including those detailed in strategic roadmaps for digital and green trade.
- **Coherence:** Detail alignment with other EU policies (e.g., Green Deal, Digital Decade, Global Gateway) and funding programmes (e.g., Horizon Europe, InvestEU, NDICI-Global Europe), and explain how synergies will be exploited.
- **EU Added Value:** Articulate the unique benefits of EU-level intervention compared to national or private initiatives, focusing on aspects like cross-border impact, promotion of EU standards, and contribution to wider EU strategic autonomy. This approach will not only aid in project selection but also provide a clear framework for ongoing monitoring and future evaluations, consistent with the principles of Better Regulation.

Conclusion

In conclusion, CEF's **transport and digital objectives** are intrinsically linked to the **DigitalTrade4.EU roadmap** for a **rules-based, green-digital trade ecosystem**, as further detailed in strategic roadmaps for **EU leadership** in this domain. We strongly urge that the **public consultation responses** advocate for a strategic expansion and deepening of CEF's activities, particularly towards **high-impact global corridors** in **Asia and Africa**, under **EU-conditioned frameworks** that uphold our **standards and values**.

This forward-looking approach, which involves scaling up **co-funded digitalisation projects** and capitalizing on synergies with initiatives like **DEPA, UNECE Rec.49, the EU-Singapore DTA**, and the **Global Gateway**, will further embed **EU standards** in global markets. As demonstrated, such a broadening and deepening of CEF's scope, when implemented with robust **conditionalities** and alignment with EU policies and strategic roadmaps, will directly address and satisfy the core **CEF evaluation criteria**: enhancing **effectiveness** through targeted impact, ensuring continued **relevance** in a globalized world, improving **efficiency** via strategic partnerships, strengthening **coherence** with the EU's external action and internal policies, and maximizing **EU added value** by projecting EU influence and standards. Ultimately, integrating CEF with these broader strategic initiatives will ensure it remains a vital instrument for achieving the EU's long-term **connectivity, sustainability, and competitiveness goals**.

In the following pages, we present two key strategic roadmaps submitted as part of our input to the European Commission:

- The **EU Green-Digital Trade Leadership Roadmap**, provided as input under the framework of the **International Digital Strategy**, outlining priorities for advancing EU global leadership in green and digital trade.
- The **Digital Trade & Capital Markets Integration Roadmap**, developed within the context of the **Savings & Investments Union** and the EU's regulatory efforts to foster **market integration** and **efficient supervision** through public consultation.

Importance of These Tables in the CEF Context

These roadmaps are highly relevant to the **Connecting Europe Facility (CEF)** as they define critical objectives and enablers for seamless **digital infrastructure, regulatory harmonization, and ESG integration**—all essential to maximizing CEF's impact.

By aligning CEF's investment priorities with the goals and tools outlined in these roadmaps, the EU ensures coherent policy implementation, strengthens cross-sector synergies, and accelerates the development of a fully interoperable, sustainable, and competitive European and global digital trade ecosystem.

For a more detailed overview, including relevant legislation, implementation timetables, and KPIs with pilots, please refer to the attached document "**How the EU budget (MFF) can accelerate the competitiveness of green and digital trade**".

EU Green-Digital Trade Leadership Roadmap (DigitalTrade4.EU, 2025)

activity	objective	indicative metrics	tools/enablers
1. EU-Singapore DTA & Expand DEPA Partnerships	Strengthen digital trade diplomacy in Asia through high-standard agreements.	- 5+ new digital trade agreements by 2030 - 15% increase in EU-Asia digital services trade by 2028	DEPA framework, EU-Singapore DTA, Global Gateway Initiative, eIDAS 2.0
2. Implement Digital Product Passports (DPPs)	Ensure traceable, sustainable supply chains aligned with EU Green Deal.	- 50% adoption of DPPs by 2030 - 20% reduction in supply-chain carbon intensity by 2030	EU Sustainable Products Initiative, CBAM incentives, UNECE Recommendation 49
3. Fund Secure Digital Corridors in Asia	Build interoperable digital infrastructure for EU-Asia trade.	- ~€2B allocated via NDICI-Global Europe - 10+ blockchain-based traceability pilots by 2027	NDICI-Global Europe, ASEAN digital customs systems, EU Customs Data Hub
4. Harmonize Digital Standards (MLETR/eIDAS 2.0)	Enable cross-border recognition of e-documents and digital identities.	- 90% mutual recognition of e-signatures by 2028 - 70% SME adoption of eIDAS wallets	MLETR framework, eIDAS 2.0, EU Transport Law updates, UN/UNECE protocols
5. Launch Green-Digital Trade Academy	Upskill SMEs and officials on DPPs and carbon accounting.	- 40% increase in SME participation by 2027 - 60% cost savings for SMEs	Erasmus+ grants, COSME programme, tiered compliance thresholds
6. Integrate ESG into Trade Finance	Link trade finance to sustainability metrics for cheaper capital access.	- €10B/year unlocked for green trade finance - 30% lower Scope 3 emissions by 2030	InvestEU guarantees, CSRD-aligned reporting, FinTech platforms
7. Enforce Platform Interoperability	Prevent vendor lock-in and empower SMEs.	- 100% compliance with CJEU rulings by 2026 - 50% reduction in platform dominance	CJEU Case C-233/23, DEPA, eIDAS 2.0, Digital Markets Act (DMA)
8. Global Digitalisation Projects with EU Standards	Extend EU digital infrastructure and norms globally.	- 20+ co-funded projects by 2030 - 80% interoperability with EU systems	Digital Europe Programme, CEF funding, EU-Asia Digital Standards Taskforce
9. Advance UNECE Transparency Protocols	Globalize EU sustainability standards for supply chains.	- 100% alignment with UNECE Rec. 49 by 2028 - 30% reduction in greenwashing claims	UNECE CEFACT, W3C Verifiable Credentials, EU CBAM registry
10. Pilot CBAM-DPP Corridors	Link trade finance to verifiable ESG metrics for tariff incentives.	- 20% CBAM compliance cost reduction - 50% DPP adoption by 2030	IoT carbon trackers, CBAM rebate schemes, EU Customs Single Window

EU Digital Trade & Capital Markets Integration Roadmap (DigitalTrade4.EU, 2025)

activity	objective	indicative metrics	tools/enablers
1. Establish EU Trade Document Registry (ETDR)	Centralize and secure cross-border trade/ESG data for supervision	- 30% reduction in duplicate filings by 2027 - 100% fraud detection rate	Zero Trust Architecture & cross-border verification (e.g., blockchain-based systems like EBSI), MLETR-compliant systems, PSD3-PSR/FiDA APIs, vLEI
2. Digitalise Tax & Customs Interfaces	Integrate trade, tax, and customs data flows to reduce friction and fraud	- 50% faster customs clearance - 30% reduction in VAT fraud - Full uptake of EU Single Window by 2028	EU Customs Data Hub, Single Window for Customs, VAT in the Digital Age (ViDA), vLEI for trader authentication, eFTI/eCMR linkages
3. Adopt MLETR + eIDAS 2.0	Enable seamless digital negotiable instruments and cross-border recognition	- 70% faster transaction times - 95% SME adoption of e-signatures	MLETR framework, eIDAS 2.0 digital identity wallets, EU legal harmonization tools
4. Develop RegTech supervision tools	Enhance real-time oversight of capital markets and ESG compliance	- 50% reduction in supervisory costs - 80% automated ESG data collection	AI/ML dashboards, Legal Sandboxes, ETDR-linked reporting systems
5. Digital Bonds & Convertibles	Enable automated, ESG-linked debt instruments	- 30% reduction in issuance costs - 20% lower interest rates for ESG-compliant bonds - 100% real-time conversion execution	ETDR registry, smart contracts, DPP/ESG data integration, eIDAS 2.0 authentication
6. SME-friendly compliance frameworks	Ensure SMEs benefit from digital reforms without disproportionate burden	- 40% increase in SME participation - 60% cost savings for SMEs	Tiered compliance thresholds, Green-Digital Trade Academy, Erasmus+ grants
7. Pilot CBAM-DPP Corridors	Link trade finance to verifiable ESG metrics for tariff incentives	- 20% CBAM compliance cost reduction - 50% adoption of DPPs by 2030	Digital Product Passports (DPPs), IoT carbon trackers, CBAM rebate schemes, CBAM certificate registry integration, EU Customs Single Window
8. Harmonize e-document laws	Eliminate legal fragmentation for digital trade documents	- 90% mutual recognition of e-Bills of Lading - 0 paper-based processes	EU Transport Law updates (e.g. eFTI, eCMR), UN/UNECE protocols, Legal Harmonization Sandboxes
9. ESG-linked finance incentives	Reward sustainable supply chains with cheaper capital	- €10B/year green trade finance unlocked - 30% lower Scope 3 emissions	InvestEU guarantees, FinTech platforms, CSRD-aligned reporting templates