Prepared by DigitalTrade4.EU

Aligning EU Strategic Objectives with the European Trade Indexes Registry (EUTIR)

Feedback to the EU Commission

August 2025

1. Introduction

The objectives identified in the accompanying analysis – strengthening trust in digital trade processes, ensuring interoperability across regulatory and market actors, supporting sustainability compliance, and reinforcing Europe's competitiveness – are directly aligned with the ambitions of the **European Trade Indexes Registry (EUTIR)**. The documents underline the urgency of reducing duplication, enhancing legal certainty, and enabling machine-readable data flows across customs, product lifecycle, sustainability, and permit systems. These priorities echo the EUTIR vision as a **decentralised and interoperable trust anchor**, capable of harmonising verification processes and embedding resilience into the EU's digital trade ecosystem.

By connecting with international identity frameworks such as **LEI/vLEI** and linking to EU-specific identifiers like **EORI**, EUTIR provides the technical and legal infrastructure needed to integrate global supply chains with EU digital policies. It also complements major EU legislative frameworks, including the **eFTI Regulation, Digital Product Passport, CBAM, and eIDAS 2.0 (Regulation (EU) 2024/1183)**, ensuring that structured datasets can be verified seamlessly by both authorities and private actors. Furthermore, the alignment with the EU Competitiveness Compass reinforces that EUTIR is not only a technical solution but also a strategic instrument for fostering innovation, sustainability, and long-term economic growth.

Against this backdrop, the following feedback situates EUTIR within the broader policy and regulatory context, demonstrating how it can serve as the cornerstone for Europe's **green-digital trade transition** and global leadership in secure, transparent, and AI-ready trade ecosystems.

1.1. Common interests between *Global Europe* Objectives and the EUTIR Framework

#	Global Europe Objectives	Shared Interest with EUTIR	EUTIR Contribution
1	**Simplification & Coherence** – one main instrument for EU external action, alignment across programmes	Need for unified data standards and single access points	EUTIR provides a **decentralised trust anchor** reducing duplication and increasing legal certainty across trade processes
2	**Flexibility & Rapid Response** – ability to adapt funding to crises, geopolitical shifts	Need for scalable, modular digital infrastructure	EUTIR enables **interoperable registries** and modular integration with EU/national systems
3	**Impact & Competitiveness** – strengthen EU's economic resilience and seize opportunities	Need to boost EU competitiveness through trusted digital trade	EUTIR links to **LEI/vLEI, EORI**, and supports **automated compliance checks** (eFTI, CBAM, DPP)
4	**Sustainability & Green Transition** – Paris Agreement, SDGs, CBAM, biodiversity	Need for machine-readable ESG data exchange	EUTIR embeds **sustainability verification datasets** into trade flows
5	**Security & Migration Management** – address root causes of instability and displacement	Need for trusted, secure cross-border data exchange	EUTIR ensures **tamper-proof verification** and **AI-ready datasets** supporting secure movements of goods/people
6	**Partnerships & Enlargement** – support pre-accession and neighbourhood policies	Need for alignment with international identifiers and trust systems	EUTIR bridges **EU identifiers** with **global registries**, supporting candidate countries' integration
7	**Humanitarian Aid & Crisis Response** – rapid mobilisation of funds and assistance	Need for transparent monitoring and reporting	EUTIR facilitates **traceable digital records** for aid flows and compliance

2. Why a European Trade Indexes Registry (EUTIR) is Needed

The **European Trade Indexes Registry (EUTIR)** — *(in some earlier documents referred to as the Digital Documents Register)* — has been proposed to the European Commission as the **next step in global trade digitalisation** and a catalyst for the **green transition**. Its purpose is to provide a **decentralised, interoperable, and secure infrastructure** for registering and verifying trade-related data sets across the EU and with international partners. EUTIR aligns with the objectives of the **EU Competitiveness Compass**[1], fostering a data-driven trade environment that supports AI/ML-driven trade facilitation, innovation, and sustainable economic growth.

EUTIR acts as a **trust anchor** for Economic Operators, Service Providers, and Competent Authorities, ensuring that all registered data sets — whether related to freight transport, product lifecycle, sustainability compliance, or permits — are **authentic, traceable, and machine-readable**. This not only strengthens legal certainty but also reduces administrative burdens, eliminates duplication, and increases efficiency in cross-border trade.

The strategic value of EUTIR lies in its ability to **harmonise digital verification processes** across sectors, connect with global identifier systems such as **LEI/vLEI** supported by GLEIF[2], and link to EU identifiers like **economic operators registration and identification (EORI)**. By providing a single, trusted verification layer for multiple types of regulated documents and datasets, EUTIR supports interoperability both within the EU and globally.

Importantly, EUTIR also **enables structured data environments** that can be leveraged by **machine learning (ML)** and **artificial intelligence (AI)** tools for advanced analytics, risk assessment, and trade facilitation. This capability creates a significant **competitive advantage**

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[1] European Commission. Competitiveness compass
https://commission.europa.eu/topics/eu-competitiveness/competitiveness-compass_en

[2] GLEIF – Global Legal Entity Identifier Foundation
https://www.gleif.org/en

for the EU on the global stage, allowing faster market access, simplified lending procedures for operators choosing environmentally friendly solutions, and streamlined compliance with sustainability standards.

As a decentralised and interoperable infrastructure, EUTIR can also be adapted for **dual-use applications**, including integration into secure supply chain and defence logistics systems, ensuring resilience and trust in critical goods flows.

The name **EUTIR** was deliberately chosen to:

- **Avoid confusion** with the long-established "TIR Convention" (Transports Internationaux Routiers), which is primarily used for international road transport permits.
- **Emphasise the European dimension** of the registry while retaining the clarity of the "Trade Indexes Registry" concept.
- **Highlight interoperability** with global identity frameworks (LEI/vLEI) and alignment with international supply chain and trade finance systems.
- **Provide legislative clarity**, ensuring that EUTIR is defined as a new, distinct registry with its own technical and legal architecture.

3. Roles in the EU Digital Trade Ecosystem

3.1 Economic Operators

Economic Operators are the primary creators, holders, and users of trade-related information. They include:

- **Financial Institutions** – banks, trade finance providers, insurers.
- **Logistics Providers** – carriers, freight forwarders, warehouse operators.
- **Manufacturers** – producers of goods and intermediate products.
- **Importers / Exporters** – companies engaged in cross-border trade.

Legislative Enhancement:

To ensure global and EU interoperability, Economic Operators should be identifiable by **LEI/vLEI** in addition to **EORI** where applicable. This dual-identifier model allows seamless cross-referencing between EU customs systems and international trade finance networks. It reduces the administrative burden on Economic Operators by eliminating the need for duplicate registrations in different jurisdictions. By embedding this requirement into customs, transport, and environmental legislation, the EU ensures that its digital trade infrastructure remains interoperable with global trust frameworks.

3.2 Service Providers

Service Providers operate specialised digital platforms and registries that structure, store, and exchange regulated trade data:

- **European Trade Indexes Registry (EUTIR)** – EU-level trust and indexing registry built on EBSI-based[3] Distributed Ledger Technology (DLT); provides Certified Providers Registry, Data Sets Metadata storage, Traceability, and Verification Services; interoperable with electronic freight transport information (eFTI), Digital Product

[3] European Commission. What is European Blockchain Services Infrastructure (EBSI) https://ec.europa.eu/digital-building-blocks/sites/display/EBSI/Home

Passport (DPP), Permit Registries, and EU Carbon Border Adjustment Mechanism (CBAM) platforms.

- **eFTI Platforms** – manage electronic freight transport information; support Digital Business Wallet submissions to third parties without direct platform access; connected to ICS2, Customs SW, and EUTIR for document version verification.
- **DPP Platforms** – manage product lifecycle, ESG/CE compliance, and linked traceability identifiers; interoperable with eFTI, Permit Registries, CBAM, and eInvoicing.
- **Permit Registries** – issue and manage regulatory certificates (veterinary, phytosanitary, chemical); provide Real-Time Verification APIs for legal validity, complementary to EUTIR's technical authenticity checks.
- **CBAM Registries** – record embedded carbon data for imported goods; interoperable with DPP and Customs SW for compliance validation.
- **Etc**.

Legislative Enhancement:

Require that **all registries and platforms**, including EUTIR, that register or validate trade documents in official EU processes are **accredited** under a harmonised EU-wide scheme. This will ensure consistent technical and legal compliance across all sectors, improving trust and operational reliability. Real-time synchronisation of certification status with EUTIR will prevent non-compliant or revoked Service Providers from participating in regulated processes. Such a requirement will also facilitate mutual recognition of trusted platforms in international agreements, strengthening the EU's position in global digital trade governance.

3.3 Competent Authorities

Competent Authorities are the official bodies responsible for overseeing compliance with EU and national regulations in the context of cross-border trade and market operations. In the EUTIR environment, they play a central role in verifying the authenticity, integrity, and compliance status of trade-related data sets.

- **Customs Authorities** – operate systems such as ICS2 and the EU Customs Single Window, receiving trade data from eFTI, DPP, CBAM, and Permit Registries. They use

EUTIR to verify that the data sets presented are authentic, up-to-date, and linked to certified service providers.

- **Market Surveillance Authorities** – oversee product compliance, safety, environmental standards, and conformity assessments across the EU single market. They access EUTIR to validate the traceability and certification status of product-related data sets, ensuring interoperability with DPP platforms, CBAM registries, and permit databases.
- **Tax Authorities** – manage VAT, excise duties, and other fiscal obligations linked to cross-border trade, using EUTIR to cross-check financial and customs-related data.

Legislative Enhancement:

Mandate that all Competent Authorities, including Customs Authorities, Market Surveillance Authorities, and Tax Authorities, have **direct read-access** to EUTIR Verification Services to authenticate data sets without requiring multiple submissions from Economic Operators. This will streamline regulatory processes, reduce transaction costs, and minimise errors from manual data re-entry. It will also strengthen **real-time risk assessment capabilities**, enabling early detection of non-compliance and fraud. Embedding these access rights in sector-specific legislation will ensure a uniform approach across Member States, eliminating fragmentation in digital verification procedures.

3.4 Accredited Certification Bodies

Independent entities responsible for verifying Service Providers' compliance with technical and legal requirements.

- Must issue **LEI/vLEI-based credentials** to ensure global identity assurance.
- Should be part of a **mutual recognition framework** across Member States and sectors.

Legislative Enhancement:

Integrate mutual recognition clauses for accredited Service Providers across customs, transport, and environmental legislation. This will avoid duplication of certification processes and reduce delays in onboarding new platforms into the EU trust framework. By recognising accreditation issued in one Member State across the EU, regulatory coherence is improved, and cross-border trade digitalisation is accelerated. Including LEI/vLEI credentials in certification requirements will further ensure interoperability with non-EU trust ecosystems.

3.5. Interoperability Ecosystem for EU Digital Trade and Customs Integration

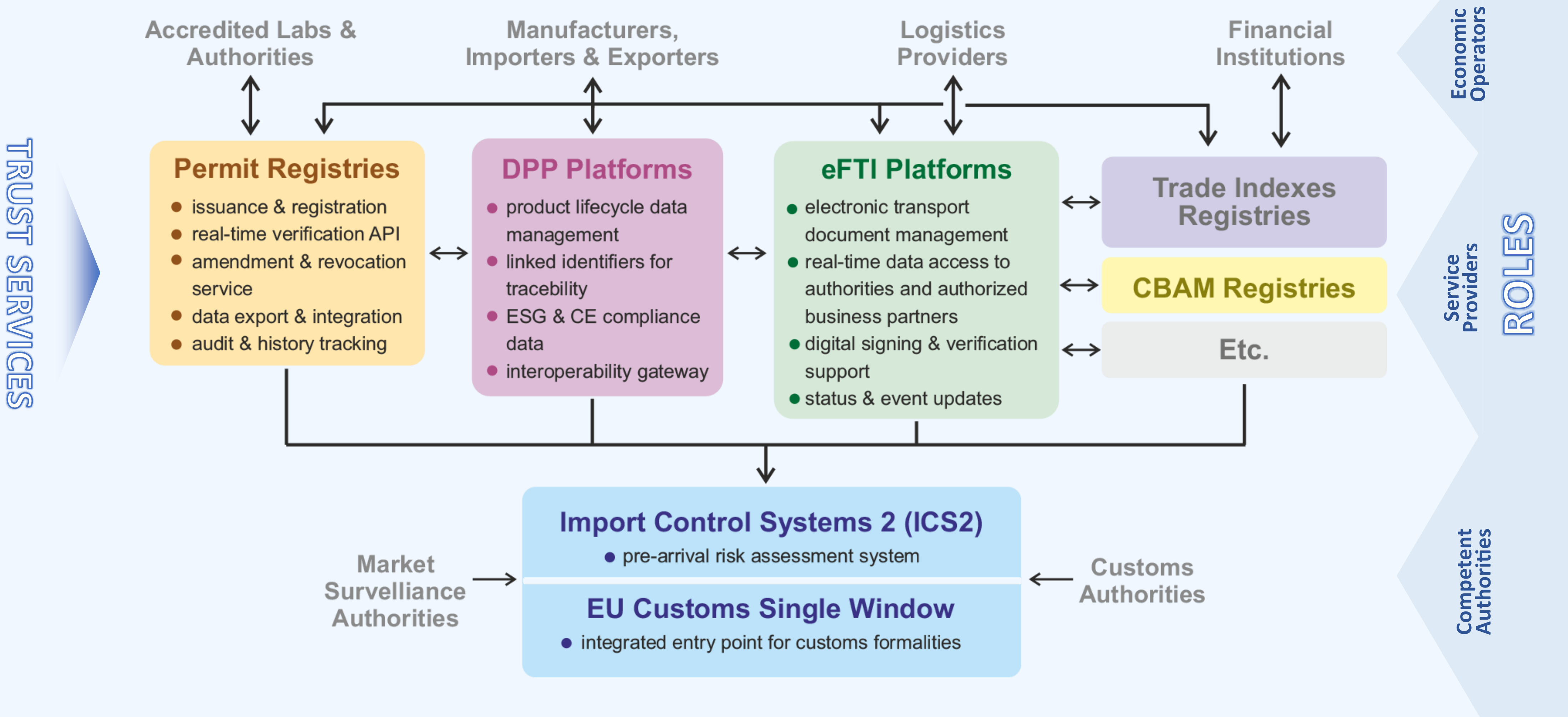

Figure 1. This diagram illustrates the key platforms, data flows, and stakeholder interactions across the EU's digital trade and customs ecosystem. It shows how manufacturers, logistics providers, and regulatory systems connect through structured data platforms—such as eFTI, the Digital Product Passport, and EU Customs systems—while integrating with trusted external sources including TRACES, REACH-IT, and EUDAMED. ***Trust Services*** *supporting this interoperability include LEI/vLEI, Qualified Electronic Signature, Qualified Electronic Seal, Qualified Timestamp, etc. All data exchanges comply with the* ***General Data Protection Regulation (GDPR)****. The diagram was prepared by Riho Vedler and is presented on behalf of the DigitalTrade4.EU consortium.*

3.6. Platform Functions and Trust Roles in the EU Digital Trade Ecosystem

#	Platform	Core Function	Key Actors	Interoperability Role	Trust Features
1	**eFTI Platform**	Structures and exchanges electronic freight transport information in accordance with EU regulation. Supports Digital Business Wallet submissions to third parties (e.g., warehouses) without granting direct platform access.	Logistics providers, freight forwarders, customs brokers, software vendors	Connected to ICS2, Customs SW, DPP; can interact with TDR for version verification before release to third parties.	Signing-enabled, eIDAS/vLEI, traceable submission logs, TDR-assisted latest-version checks
2	**DPP Platform**	Digitally represents product lifecycle data, ESG/CE compliance, and traceability information.	Manufacturers, importers/exporters, ESG auditors, platform providers	Linked to eFTI, permit registries, eInvoicing, CBAM Registries, customs declarations; interoperable via linked identifiers.	Verifiable ESG/CE data, linked traceability to other platforms
3	**EU Customs Single Window**	Single EU-wide gateway for customs and regulatory documentation (incl. permits).	National customs authorities, inspection agencies	Receives data from eFTI, DPP, ICS2, CBAM Registries; pushes to national systems.	Integrated with risk analysis
4	**ICS2**	Performs pre-arrival cargo risk assessments using Entry Summary Declarations (ENS).	EU customs administrations, transport carriers, EU security agencies	Pulls eFTI/DPP/ permit info	Real-time validation
5	**Permit Registries**	Hosts and validates official permits and certificates (e.g., veterinary, phytosanitary, chemical). Real-Time Verification API checks legal validity, current status, and conditions — even when TDR provides technical authenticity verification.	National competent authorities (e.g., TRACES, ECHA), EU agencies	Linked from DPP & eFTI; accessible to TDR for live status lookups.	Real-time legal verifiability, amendment and revocation logs
6	**EU Trade Indexes Registry (EUTIR)**	Anchors and registers metadata (e.g., hashes, signatures, timestamps) of trade documents (e.g., eFTI, eBL, invoices), enabling full document traceability across platforms. Tracks document origin, versioning, Certified Provider ID (LEI/vLEI), and custody history without exposing content.	Registry operators (EU or delegated), customs, logistics integrators, financial institutions	Reference point for document verification and linking across eFTI, DPP, CBAM, and Customs SW.	Tamper-proof identifiers, issuer verification, Certified Provider registry, MLETR compliance, traceable audit trails with DocumentCustodyHistory
7	**CBAM Registries**	Record and manage embedded carbon emissions data for imported goods under the EU Carbon Border Adjustment Mechanism.	Importers, customs authorities, national CBAM authorities, accredited CO_2 verifiers, ESG auditors	Linked with DPP for product-level emission data, Customs SW for compliance validation, trade finance systems for tariff adjustments.	Verified emission declarations, EU-accredited verifier network, secure transmission to customs
–	**Business Wallet**	Decentralised environment for securely holding and sharing credentials and electronic documents under user control.	Traders, SMEs, logistics operators, authorised representatives, identity providers	Interacts with all above	vLEI identity, eIDAS 2.0

4. European Trade Indexes Registry (EUTIR) as the Trust Anchor

The **European Trade Indexes Registry (EUTIR)** is a proposed EU-level trust and indexing layer for electronic trade documents, designed to ensure authenticity, integrity, and traceability across platforms and jurisdictions. It is best suited for development on the **EBSI infrastructure**, leveraging Decentralised Ledger Technology (DLT) to provide tamper-resistant storage of document metadata and verifiable credentials. **EUTIR does not store the actual electronic documents themselves, only the metadata necessary to verify their authenticity, current validity, and the identity of the document's rightful holder.**

A key proposed feature of EUTIR is its interoperability with the **Global Legal Entity Identifier Foundation (GLEIF)** infrastructure, enabling integration of both **Legal Entity Identifiers (LEI)** and **verifiable LEIs (vLEI)**. This alignment would ensure seamless entity identification across jurisdictions, support regulatory compliance, and strengthen trust in cross-border transactions.

- **LEI** ensures globally unique identification of legal entities in compliance with ISO 17442.
- **vLEI**, aligned with the GLEIF trust framework, provides cryptographically verifiable credentials, allowing **real-time machine-verifiable proof of entity identity**.
- This integration allows EUTIR to validate Certified Providers instantly, support **cross-border mutual recognition** of identities, and align with international trade finance and compliance systems already using LEI.
- The combination of **EORI** for EU-specific customs processes and **LEI/vLEI** for global interoperability ensures a dual-identifier model that is both policy-neutral and technically future-proof.

Core Functionalities:

1. **Certified Providers** – organisations, companies, and other accredited entities, each uniquely identified via LEI/vLEI and EORI where applicable.
2. **Data Sets Metadata** – *Refers to the structured descriptive information about each registered data set, without storing its full content. This metadata enables the identification, verification, and traceability of trade-related data across platforms and jurisdictions.*

    a) **Registration** in EUTIR assigns a globally unique identifier (UUID) to each data set, ensuring it can be unambiguously referenced in cross-border transactions. In addition to the core registration process, an electronic document can be linked to:

    - **Insurance information** – allowing stakeholders to confirm the existence and scope of coverage.
    - **Financing Reference** – enabling secure linkage to financing arrangements.

    Why Financing Reference is important:

    - **For banks** – prevents multiple pledging of the same document as collateral.
    - **For customs and market surveillance authorities** – provides immediate visibility into whether a document is under financial obligations.
    - **For service providers** – enables quick API checks before further document processing.

    b) **Traceability** in EUTIR ensures that the lifecycle of a registered data set — including all updates, transfers, and changes of custody — is fully recorded and linked across the supply chain. **EUTIR does not store the actual content of any document**, but instead maintains structured metadata that enables:

- Confirmation that the document presented to a stakeholder is **authentic**.
- Confirmation that it is the **latest valid version** of the data set.
- Identification of the **current legal holder** (owner) of the valid version, which is essential in cases where the document changes hands multiple times during the supply chain — for example, with **Negotiable Cargo Documents**[4], including **electronic Bills of Lading (eBL)**.

This mechanism guarantees that even if a document is modified by multiple Certified Providers in the supply chain, the receiving party can instantly verify its validity and rightful holder before proceeding with any transaction or operational step.

c) **Verification** confirms the authenticity and current validity of a registered data set.

- EUTIR provides **base verification** – confirming whether the data set is valid and whether the source is authentic.
- In cases involving **special conditions** defined by EU Member State legislation (e.g., sector-specific compliance checks, additional technical validations), the additional verification process may be performed by a **Service Provider**.
- EUTIR guarantees that the verification process always uses an **authentic source of truth**, preventing reliance on unverified or tampered data.

Legislative Enhancement:

1. Recognise EUTIR as the official EU-level trust service for registering and verifying trade data set metadata.

[4] United Nations. Working Group VI: Negotiable Cargo Documents https://uncitral.un.org/en/working_groups/6/negotiablecargodocuments

2. Mandate that only Certified Providers listed in EUTIR may participate in regulated trade data exchange processes.
3. Define the admissibility of metadata (UUID, file hash, financing and insurance references) as legal proof of authenticity and integrity in administrative and judicial proceedings.
4. Ensure all Competent Authorities have direct read-access to EUTIR's verification services, avoiding multiple submissions by Economic Operators.
5. Harmonise metadata standards across the EU to guarantee cross-border interoperability and machine-readability.
6. Integrate LEI/vLEI identifiers in sector-specific regulations to ensure global recognition of EU-certified entities.

Relevant EU Legislation:

- **Regulation (EC) No 765/2008** – establishes EU accreditation framework; relevant for recognising Certified Providers in EUTIR.
- **Decision No 768/2008/EC** – harmonised rules for product marketing and conformity assessment bodies.
- **Regulation (EU) 2019/1020** – market surveillance and product compliance; can be extended to digital trade data set verification.
- **Regulation (EU) 2020/1056** – eFTI; can integrate EUTIR as a trust verification layer.

Potential Amendments:

- Amend eFTI and customs implementing acts to require EUTIR verification for all relevant logistics and trade datasets.
- Extend market surveillance scope to include trade dataset metadata verification.
- Incorporate LEI/vLEI into regulated trade documentation requirements.

4.1. EUTIR Environment: Data Set Lifecycle and Accreditation–Certification Flow

Figure 2. This diagram illustrates the interaction between Economic Operators, Service Providers, Accredited Certification Bodies, and the European Trade Indexes Registry (EUTIR) in both data set lifecycle management and the accreditation–certification process. 'Data Set' refers to both structured machine-readable records (e.g. eFTI, DPP, CBAM) and standardised electronic documents. The diagram was prepared by Riho Vedler and is presented on behalf of the DigitalTrade4.EU consortium.
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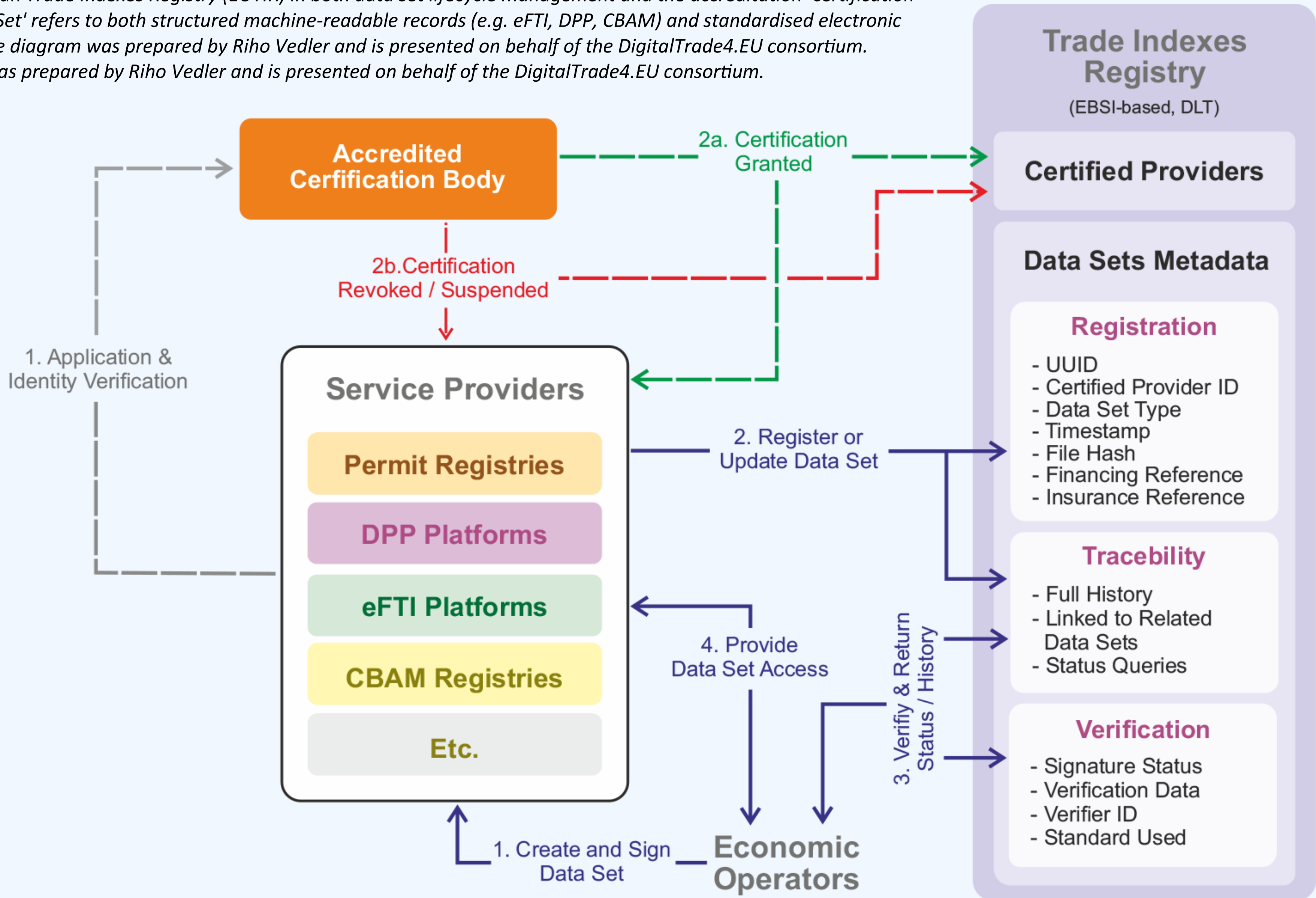

4.2. Accreditation and Certification Framework within the EUTIR Environment

EUTIR operates in close alignment with an EU-wide accreditation and certification framework to ensure that all Service Providers meet harmonised technical and legal requirements before participating in regulated data exchange.

- **Accreditation** – Performed by an **Accredited Certification Body (ACB)**, verifying compliance with applicable EU regulations, security standards, and interoperability protocols.
- **Certification** – Granted upon successful accreditation, with the Certified Provider immediately registered in EUTIR.
- **Continuous Compliance** – Certification status (active, suspended, revoked) is synchronised in real-time with EUTIR to ensure only valid providers participate in official processes.
- **LEI/vLEI Integration** – All Certified Providers receive globally unique, verifiable identifiers, enabling cross-border trust and interoperability.

This model ensures that both the **technical authenticity** of data (via EUTIR's Verification Service) and the **legal compliance** of the Service Provider (via ACB certification) are guaranteed.

Legislative Enhancement:

1. Require that all Service Providers participating in regulated trade data exchange processes undergo accreditation by an EU-recognised **Accredited Certification Body (ACB)**.
2. Mandate that certification data, including status changes (active, suspended, revoked), be synchronised in real-time with EUTIR.
3. Integrate **LEI/vLEI** and **EORI** identifiers as mandatory elements in certification records.
4. Require that all issued certificates be machine-readable and cryptographically verifiable.

5. Ensure that suspension or revocation of certification results in immediate access revocation across all regulated digital trade platforms.

Relevant EU Legislation:

- **Regulation (EC) No 765/2008** – accreditation requirements and recognition within EA framework.
- **Decision No 768/2008/EC** – common framework for conformity assessment.
- **Regulation (EU) 2020/1056** – certification model for digital trade platforms (eFTI).
- **Regulation (EU) 2023/956** – authorised declarant framework (CBAM) can integrate EUTIR trust layer.

Potential Amendments:

- Require that all ACB-issued certifications be registered in EUTIR as a condition for legal validity in regulated processes.
- Create a unified EU template for digital accreditation and certification records, linked to LEI/vLEI.
- Introduce real-time API-based status updates from ACBs to EUTIR.

4.3. Data Exchange Between Stakeholders

In the EUTIR environment, data exchange follows a **federated trust model**:

1. **Create and Sign Data Set** – The Economic Operator generates and digitally signs a trade-related data sets (e.g., eFTI, DPP, CBAM).
2. **Register (Update) Data Set** – The Service Provider registers the data set's metadata in EUTIR, including UUID, type, timestamp, file hash, **financing reference, insurance reference**, and Certified Provider ID.
3. **Provide Data Set Access** – EUTIR facilitates access to authorised parties (e.g., customs, tax, banks), enabling them to verify the authenticity and traceability without handling full document content.

Dual Verification Path:

- **Technical Authenticity** – Checked in EUTIR via metadata and hash matching.
- **Content Validity** – Verified by sector-specific registries (e.g., permit registries, CBAM registry) using their own APIs.

This approach avoids unnecessary duplication of verification functions and ensures that each layer of the system performs its most efficient role.

Legislative Enhancement:

1. Require that all trade data sets used in regulated processes be technically verified via EUTIR before acceptance by Competent Authorities.
2. Clearly define the division of responsibilities between **EUTIR** (technical authenticity / integrity) and **sector-specific registries** (content validation).
3. Mandate that Service Providers perform automated pre-checks before registering data sets in EUTIR.
4. Grant Competent Authorities direct API access to EUTIR for authenticity checks.
5. Ensure interoperability between EUTIR and EU-wide systems such as **EU Customs Single Window, ICS2, CBAM Registry, and eFTI platforms**.
6. Require machine-readable, standardised data formats to enable AI and ML-driven analytics.

Relevant EU Legislation:

- **Regulation (EU) 2020/1056** – eFTI Regulation; extend to include mandatory EUTIR verification.
- **Regulation (EU) No 952/2013** – Union Customs Code; integrate EUTIR in customs data workflows.
- **Regulation (EU) 2023/956** – CBAM; require certificate authenticity checks via EUTIR.
- **Regulation (EU) 2019/1020** – Market Surveillance Regulation; link surveillance data to EUTIR metadata.

- Sector-specific permit regulations (veterinary, phytosanitary, chemical) – include UUID/hash verification in EUTIR as a precondition for official acceptance.

Potential Amendments:

- Modify customs and eFTI implementing acts to require an EUTIR verification step before processing.
- Require sector-specific permit registries to register document metadata in EUTIR upon issuance.
- Allow AI-based monitoring tools to use EUTIR datasets for fraud detection and compliance risk scoring.

5. Strategic Digital Models for Sustainable Trade and Logistics

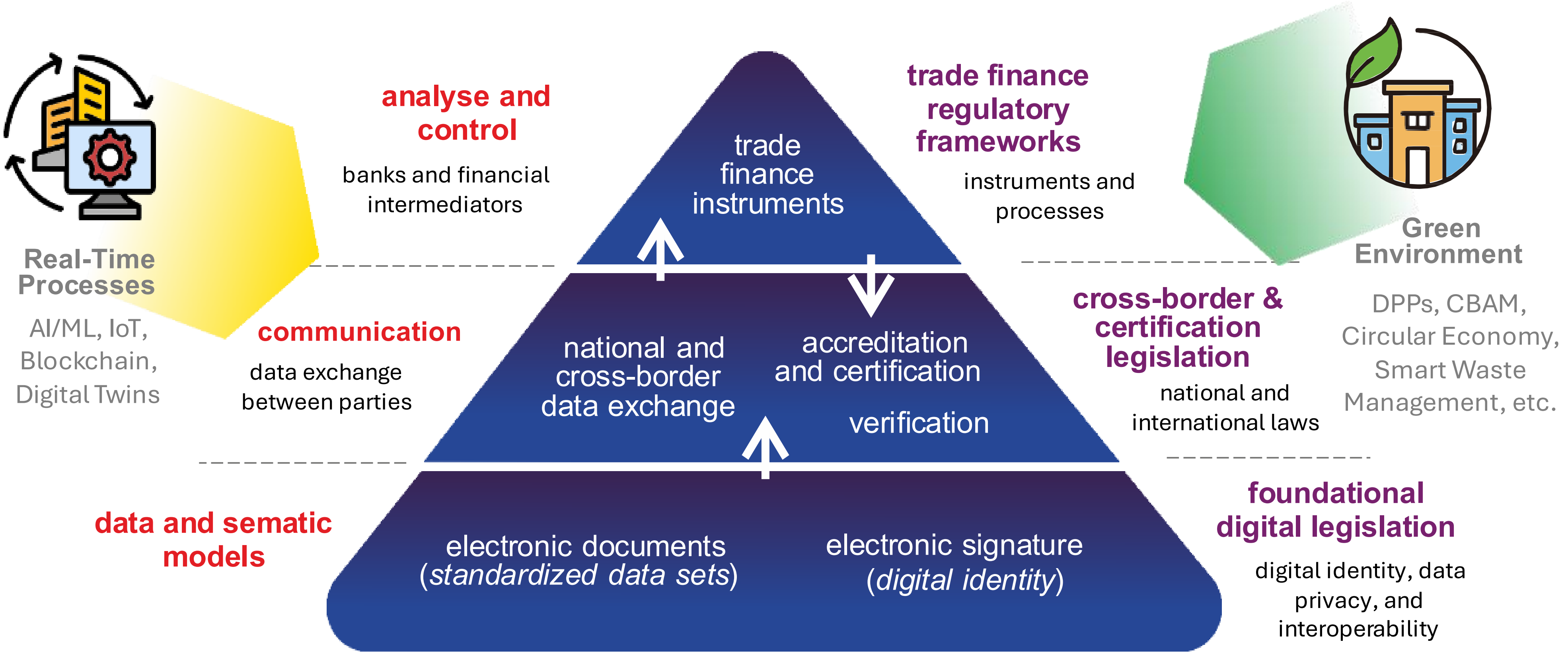

Figure 3 This visual model bridges the European Commission's strategic objectives with the proposed regulatory and operational solutions, illustrating how digital requirements and compliance mechanisms can be implemented in a technologically neutral and future-proof manner. All digital requirements and compliance mechanisms must remain technologically neutral and future-proof, allowing companies to select and reuse their preferred IT solutions. The diagram was prepared by Riho Vedler and is presented on behalf of the DigitalTrade4.EU consortium, icons by Flaticon.

6. Draft Amendment Proposals

6.1. Integration of EUTIR into Digital Trade Objectives

Proposed Legal Text, Annex II, Specific Objectives (Europe), point (m) – "Developing the digital economy and society..."**:**

> *Support the development and deployment of interoperable trust registries, such as the European Trade Indexes Registry (EUTIR), to ensure secure, machine-readable and verifiable datasets for trade, customs, sustainability and product-related data flows, fully aligned with Regulation (EU) 2024/1183 (eIDAS 2.0) and other relevant Union frameworks.*

Justification: This amendment embeds **EUTIR as a digital trust anchor**, reducing fragmentation and enhancing data interoperability. It provides candidate countries and external partners with tools to meet EU standards in customs, trade, and sustainability. By linking EUTIR with eIDAS 2.0 and identifiers such as **EORI** and **LEI/vLEI**, the EU ensures that its external action instruments are future-proof, AI-ready, and globally interoperable. This strengthens transparency, competitiveness, and resilience in the digital economy.

6.2. Strengthening ESG and Climate Compliance through EUTIR

Proposed Legal Text, Annex II, Specific Objectives (Europe), point (o) – "Reinforcing environmental protection, increasing resilience to climate change..."**:**

> *Promote the integration of verifiable ESG and sustainability datasets into trade processes, supported by the European Trade Indexes Registry (EUTIR), to facilitate transparent compliance monitoring with Union climate, biodiversity, and circular economy standards.*

Justification: Global Europe must support the **green transition** by enabling trusted sustainability data flows. EUTIR provides a decentralised registry to verify CO_2 emissions, CBAM certificates, and Digital Product Passport data. This ensures that partner countries can align with the **Paris Agreement**, SDGs, and EU's climate neutrality goals. Embedding EUTIR reduces administrative burden, prevents greenwashing, and enhances trust between EU institutions, partner governments, and private sector actors.

6.3. Enhancing Humanitarian Aid and Crisis Response Transparency

Proposed Legal Text, Annex II, Specific Objectives (Europe), point (k) – "Contributing to the resilience of partner countries..."**:**

> *Ensure that financial flows and aid distribution under crisis-response mechanisms are digitally traceable and verifiable through interoperable registries such as the European Trade Indexes Registry (EUTIR), guaranteeing accountability and transparency for both Union and partner beneficiaries.*

Justification: In fragile contexts, **traceability and transparency** are crucial to maintain trust in EU humanitarian and financial interventions. EUTIR ensures that aid funds, procurement contracts, and material flows can be verified in near real-time, reducing risks of corruption and misuse. This amendment guarantees that humanitarian support and crisis responses are **efficient, transparent, and resilient**, thereby reinforcing EU credibility and accountability in external action.

6.4. Linking Enlargement and Neighbourhood Integration to EUTIR

Proposed Legal Text, Annex II, Specific Objectives (Europe), point (a) – "Supporting the enlargement process..."**:**

> *Support candidate and neighbourhood countries in adopting interoperable digital trust infrastructures, such as the European Trade Indexes Registry (EUTIR), to accelerate alignment with Union acquis, especially in customs, trade facilitation, public procurement, and regulatory compliance.*

Justification: Enlargement and neighbourhood policies require **gradual regulatory and technical convergence**. By deploying EUTIR, partner countries can directly connect their systems to EU frameworks, ensuring smoother accession pathways. This amendment fosters transparency in customs, reduces corruption in procurement, and strengthens data-driven governance. It also lowers compliance costs for SMEs in candidate countries, preparing them for full participation in the **EU Single Market**.

6.5. Securing Europe's Strategic Autonomy with EUTIR

Proposed Legal Text, Main Regulation text, Article on "General Objectives" (COM(2025) 551):

> *The Instrument shall contribute to the Union's strategic autonomy by supporting the deployment of digital trust infrastructures such as the European Trade Indexes Registry (EUTIR), which ensures secure interoperability of trade, financial and sustainability data, and reduces dependency on fragmented or third-country digital solutions.*

Justification: This amendment elevates EUTIR to a **strategic autonomy tool** within Global Europe. It reinforces EU sovereignty in digital trade infrastructures by reducing reliance on external solutions and fragmented standards. EUTIR ensures trusted datasets across borders, enhances security of supply chains, and safeguards European competitiveness. By institutionalising EUTIR within Global Europe, the EU gains a durable mechanism to align external funding with its broader **geopolitical and economic strategy**.

6.6. Integration of EORI and LEI/vLEI into Partner Country Alignment

Proposed Legal Text, Annex II, Specific Objectives (Europe), point (d) – "Fostering regional economic integration and progressive integration into the Union single market..."**:**

> *Support the adoption and interoperability of recognised digital identifiers, including the Economic Operator Registration and Identification (EORI) system and the Legal Entity Identifier (LEI/vLEI), as part of partner countries' regulatory convergence and integration with the Union's Single Market and Digital Trade frameworks.*

Justification: A clear reference to **EORI and LEI/vLEI integration** ensures that partner countries' businesses and authorities can seamlessly participate in EU trade and financial ecosystems. EORI guarantees compliance and traceability for customs and border procedures, while LEI/vLEI provides globally recognised identity standards for companies and institutions, including in financial and ESG reporting. By embedding these identifiers in Global Europe, the EU reduces duplication of identity frameworks, strengthens trust in cross-border transactions, and enhances interoperability between EU systems (eFTI, CBAM, DPP, eIDAS 2.0) and global infrastructures. This amendment directly supports **strategic alignment, anti-fraud measures, and digital trust**, while lowering barriers for SMEs and improving access to EU markets for candidate and neighbourhood countries.

6.7. Clarifying Data Protection and GDPR Alignment in EUTIR

Proposed Legal Text, Main Regulation, Article on "General Principles" (COM(2025) 551)**:**

> *The European Trade Indexes Registry (EUTIR) shall function as a decentralised indexing service, providing references to verified datasets without storing underlying documents. All operations under this Instrument shall fully comply with Union data protection rules, including the General Data Protection Regulation (GDPR), ensuring that personal data are processed only when strictly necessary and with appropriate safeguards.*

Justification: This amendment clarifies the **technical and legal nature of EUTIR**: it is an **indexing server**, not a document repository. By explicitly stating compliance with GDPR, the regulation prevents potential misunderstandings regarding data storage and privacy obligations. This approach safeguards fundamental rights, ensures **privacy-preserving interoperability**, and strengthens trust in the system among partner countries, private operators, and EU citizens. It also aligns with the principle of **data minimisation** and guarantees that EUTIR's role is limited to enabling **verifiable links** to authoritative datasets, thereby reducing risks of liability, cyberattacks, or data misuse. Explicit GDPR alignment reinforces the EU's leadership in **trustworthy digital infrastructures** globally.

6.8. Accreditation and Certification of Registries Connected to EUTIR

Proposed Legal Text, Main Regulation, Article on "Implementation and Governance" (COM(2025) 551)**:**

> *Registries, systems, and service providers connecting to the European Trade Indexes Registry (EUTIR) shall undergo accreditation and, where relevant, certification against Union standards. The Commission shall define minimum conformity requirements to ensure that only trusted, secure and compliant infrastructures are indexed within EUTIR.*

Justification: This amendment ensures that **accreditation and certification** are central to EUTIR's governance. It prevents unverified or insecure registries from being linked into the system, thereby upholding **trust, security, and legal certainty**. By requiring compliance with Union standards (including eIDAS 2.0, cybersecurity frameworks, and sector-specific regulations), the proposal reinforces the EU's reputation as a **global leader in trustworthy digital trade infrastructures**. Certification processes will also help SMEs and partner-country authorities demonstrate compliance, lowering market-entry barriers while guaranteeing **interoperability, reliability, and data protection**. This strengthens both the technical robustness and the geopolitical credibility of the Global Europe instrument.

7. Conclusion – The Strategic Value of EUTIR

EUTIR is a strategic enabler for Europe's future competitiveness, sustainability, and security. By providing a trusted, decentralised verification environment, it accelerates trade, strengthens resilience, and supports the EU's green and digital ambitions. Its adoption would not only modernise cross-border processes but also position Europe as a global leader in transparent, ML/AI-ready trade ecosystems.

Key reasons for establishing EUTIR:

1. **Global Unique Identification** – International trade involves vast flows of data across multiple stakeholders, systems, and jurisdictions. Without globally unique identifiers, there is a high risk of duplication, misassociation, and fraud.

2. **Interoperability Across Platforms** – Modern trade relies on multiple specialised registries and platforms (eFTI, DPP, CBAM, permit registries). EUTIR functions as the **index layer**, enabling automated cross-referencing between systems without requiring manual reconciliation.

3. **Traceability & Accountability** – EUTIR maintains a full custody chain, showing the entire lifecycle of a document or shipment, including transfers between different Certified Providers, enabling transparent compliance checks.

4. **Single Source of Truth** – By acting as the authoritative reference, EUTIR ensures that both authorities and market actors can confirm that the information they use is the latest, valid, and authentic version.

5. **Support for Digital Trust Infrastructure** – Full interoperability with **GLEIF's LEI/vLEI** framework and EBSI-based DLT creates a trust environment that extends beyond the EU, enabling recognition in global supply chains and finance networks.

Now is the time to integrate EUTIR into the EU's digital policy framework and make it a cornerstone of the Single Market's next evolution.

Annex 1. Digital Trade & Capital Markets Integration Roadmap (DigitalTrade4.EU 2025)

#	activity	objective	indicative metrics	tools/enablers
1	**Establish EU Trade Indexes Registry (EUTIR)**	Decentralize and secure cross-border trade/ESG data for supervision using a distributed architecture, enabling trusted and interoperable access to regulatory and ESG information across the EU.	- 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

Annex 2. 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 with key Asian partners (e.g., Japan, India, ASEAN) 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	**Implement LEI and vLEI for Supply Chain Trust**	Harmonise and simplify legal entity identification across borders	- 90% entity coverage with LEI by 2030; 50% vLEI use in customs and eFTI transactions	ISO 17442, vLEI, eIDAS 2.0, UNECE UID
6	**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
7	**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
8	**Enforce Platform Interoperability**	Prevent vendor lock-in and empower SMEs.	- 100% compliance with CJEU rulings by 2026 - 50% reduction in platform dominance	Court of Justice of the European Union (CJEU) Case C-233/23, DEPA, eIDAS 2.0, Digital Markets Act (DMA)
9	**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
10	**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
11	**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

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 **108 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/

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