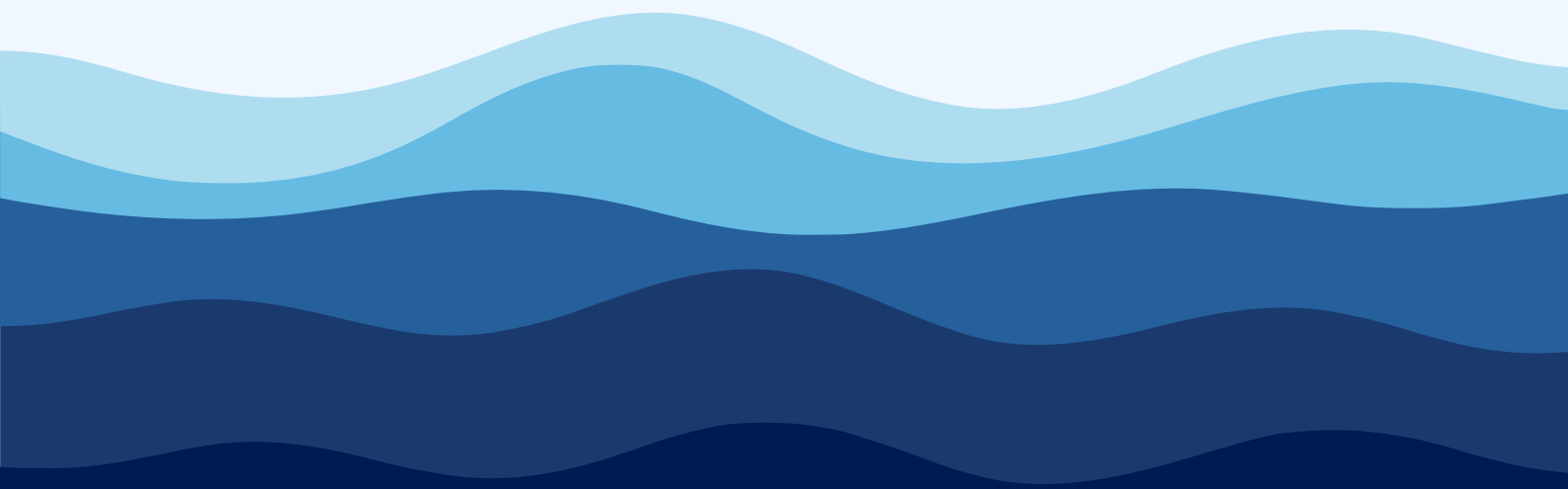


Prepared by DigitalTrade4.EU



# **Security of Gas Supply – Composition of Risk Groups**

Feedback to the EU Commission

July 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 **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:

1. 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](http://www.digitaltrade4.eu)

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# Executive Summary

DigitalTrade4.EU provides feedback on the European Commission's draft delegated regulation concerning the composition of **gas supply security risk groups**, emphasizing the critical need to integrate **digital transformation** into energy policy. The consortium, comprising experts from 17 EU and 22 non-EU countries, envisions a **seamlessly interconnected Europe** powered by **harmonized standards** for the **digitalization of trade documents and processes**.

This document proposes **seven amendments** to the draft regulation to significantly strengthen its **digital dimension** and align it with the EU Competitiveness Compass and broader objectives such as **digitalization, decarbonization, and strategic autonomy**.

Key recommendations include leveraging the **EU Digital Product Passport (DPP) platform** and principles from the proposed **EU Trade Document Registry (ETDR)** for **energy security data sharing**, mandating **MLETR<sup>1</sup>** and **eIDAS 2.0<sup>2</sup>** for **cross-border recognition of emergency energy documents**, integrating **ESG metrics** and **DPPs** into **gas supply risk assessment**, piloting **real-time RegTech dashboards** for **gas supply supervision**, harmonizing **e-document legislation** for **emergency gas supply corridors**, creating **SME-friendly compliance frameworks** for **energy sector digitalization**, and mandating the use of **LEI/vLEI** for **trusted entity identification** in energy security processes.

These recommendations aim to enhance the regulation's **effectiveness, practical impact, and long-term resilience**, while promoting **simplification, digital innovation, SME inclusion**, and alignment with the **EU's digital and green transitions**. DigitalTrade4.EU believes these changes will help the EU set a **global benchmark** for **secure, transparent, and efficient cross-border energy cooperation**. Additionally, the **EU Green-Digital Trade Leadership Roadmap** is presented, outlining actionable steps to support the EU's International Digital Strategy.

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<sup>1</sup> UNCITRAL. Model Law on Electronic Transferable Records

[https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic\\_transferable\\_records](https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic_transferable_records)

<sup>2</sup> European Commission. Discover eIDAS

<https://digital-strategy.ec.europa.eu/en/policies/discover-eidas>

# Introduction

DigitalTrade4.EU welcomes the opportunity to provide feedback on the **draft Commission Delegated Regulation (EU) .../... amending Regulation (EU) 2017/1938 as regards the composition of the risk groups for gas supply security**. Given the **rapidly changing geopolitical landscape** and the **accelerated digital transformation** of the European Union, it is essential that upcoming energy regulations fully embrace the **Single Market's potential for resilience, digitalization, and innovation**.

This document presents recommendations closely aligned with the **overarching strategic vision for the Single Market** as outlined in the Commission's 2025 Communication, "**The Single Market: our European home market in an uncertain world**" (COM(2025) 500 final). The Commission's core objectives include **enhancing the resilience and preparedness** of Member States for gas supply crises, **fostering regional cooperation and solidarity**, **reducing administrative burdens**, and supporting the EU's broader objectives for **digitalization, decarbonization, and strategic autonomy**.

DigitalTrade4.EU's proposals primarily focus on significantly strengthening the **digital dimension** by integrating **secure, interoperable digital registries** for **cross-border energy data sharing**, leveraging existing EU **digital platforms** and **architectural principles**. This feedback is provided with the aim of supporting the Commission's efforts to create a **modern, competitive, and sustainable Single Market** capable of addressing future energy security challenges.

***Note:** In this document, the terms **Small and Medium-sized Enterprises (SMEs)** and **Micro, Small and Medium-sized Enterprises (MSMEs)** are used interchangeably and carry the same meaning and weight. This clarification is important because different sources and contexts may refer to these groups using either acronym, but both encompass the full range of smaller business categories critical for economic development.*

# Expectations from the Commission's Side: The Objectives

The European Commission's draft regulation on gas supply risk groups is closely aligned with the overarching strategic vision for the Single Market as outlined in the Commission's 2025 Communication, *Strategy for making the Single Market simple, seamless and strong (COM(2025) 500 final)*<sup>3</sup>. The following objectives are at the core of the Commission's current approach:

- **Enhancing the resilience and preparedness of Member States for gas supply crises:** The Single Market is the EU's anchor for stability, enabling Member States to absorb shocks and shield themselves from external risks. The Commission's objective is to ensure the EU's collective ability to prevent and respond to gas supply disruptions swiftly and effectively, strengthening both resilience and energy security.
- **Fostering regional cooperation, coordinated risk assessments, and solidarity in emergency situations:** The Commission places a strong emphasis on joint actions and solidarity mechanisms, recognizing that effective crisis management relies on coordinated, cross-border information sharing and decision-making. A more seamless and unified market approach is necessary to maintain supply and protect citizens and businesses in times of crisis.
- **Reducing administrative burdens by streamlining risk group structures and aligning with new gas infrastructure realities:** Consistent with the Single Market Strategy's call for simplification, the regulation aims to remove unnecessary complexity, harmonize rules, and adopt digital tools to enable more efficient and cost-effective risk group management. This also addresses the need for market structures to reflect evolving infrastructure and regional interdependencies.

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<sup>3</sup> European Commission, Internal Market, Industry, Entrepreneurship and SMEs. The Single Market: our European home market in an uncertain world (May 2025)  
[https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world\\_en](https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world_en)

- **Supporting the EU’s broader objectives for digitalization, decarbonization, and strategic autonomy:** The Commission expects energy and digital policy to move hand-in-hand, with digitalisation—such as trusted data registries and real-time information exchange—playing a central role in efficient market functioning. The regulation is also seen as an instrument to align gas market operations with the EU’s green transition goals, supporting decarbonization, circularity, and reduced external dependencies.

Drawing from the 2025 Strategy, the Commission further expects:

- **More ambition and fewer barriers:** Tackling the “Terrible Ten” Single Market barriers, including legal fragmentation and complex procedures, is a top priority. The objective is to establish harmonized, straightforward rules—especially for strategic sectors like energy—ensuring smooth cross-border flows of goods, services, and information.
- **Empowerment of SMEs and innovators:** The new approach places SMEs and innovative companies at the centre, aiming for a market that is inclusive, digitally accessible, and supportive of growth across all regions and company sizes.
- **Effective digitalisation and implementation:** Digital tools and registries should enable optimal functioning of the Single Market. The Commission is committed to moving from document-based to data-based regulation and ensuring that simplification and digitalisation are embedded at all levels—EU, national, and regional.
- **Strong enforcement and national ownership:** The well-functioning of the market relies on proactive enforcement of agreed rules, increased national engagement, and transparent, collaborative governance structures.

In summary, the Commission’s expectations for the delegated regulation are that it will not only reinforce energy supply security and crisis resilience, but also serve as a model for simplification, digital innovation, SME inclusion, and alignment with the EU’s digital and green transitions. The regulation should enable Member States to act together, efficiently and transparently, within a robust and future-proof Single Market.

# Changes to Delegated Regulation

DigitalTrade4.EU recommends that the **delegated regulation's digital dimension** be significantly strengthened by integrating **secure, interoperable digital registries** for cross-border energy data sharing, leveraging existing EU digital platforms and architectural principles. Our key recommendations are reflected in the seven amendment proposals below.

**We propose the following amendments to draft regulation:**

## **1. Leverage the EU Digital Product Passport (DPP) Platform and Principles from the Proposed EU Trade Document Registry (ETDR)**

**Amendment Proposal, Annex I:**

*Member States within each gas supply risk group use or interconnect with the EU Digital Product Passport (DPP) platform—established under Regulation (EU) 2024/1781—as the trusted digital registry for secure, cross-border exchange and supervision of critical gas supply, infrastructure, and ESG-related data. In addition, Member States should be encouraged to develop interoperable national or regional digital registries for energy data exchange, based on technical principles proposed under the EU Trade Document Registry (ETDR) initiative—such as Zero Trust Architecture, verifiable credentials, and cross-border APIs—as a reference model.*

**Justification:** The DPP platform provides a secure, interoperable registry that can be adapted to critical energy infrastructure. The ETDR blueprint supports cross-border digital cooperation, aligning with the EU's resilience and interoperability goals. Digital registries reduce fragmentation and support joint risk assessments under Article 7(2). This facilitates secure, real-time communication across Member States and increases preparedness. The approach aligns with the Regulatory objective to modernize and simplify risk group functioning while improving transparency.

## 2. Mandate MLETR and eIDAS 2.0 for Cross-Border Recognition of Emergency Energy Documents

**Amendment Proposal**, Article 7, new paragraph 2a:

*All digital documents, certificates, and signatures exchanged within risk groups comply with Regulation (EU) 2024/1183 (eIDAS 2.0) and UNCITRAL Model Law on Electronic Transferable Records (MLETR) for legal recognition and enforceability across borders.*

**Justification:** MLETR and eIDAS 2.0 frameworks ensure that emergency communications are legally valid and trusted EU-wide. This allows faster activation of cross-border solidarity and avoids legal disputes during crises. Digital-first communication accelerates regional gas response coordination. It supports the Digital Single Market, and is essential for implementing data-based regulation as outlined in the 2025 Strategy. Use of these standards builds confidence in inter-state crisis communication protocols.

## 3. Integrate ESG Metrics and DPP into Gas Supply Risk Assessment

**Amendment Proposal**, Article 7(2), new sentence:

*Require common risk assessments to include verifiable ESG data, leveraging the Digital Product Passport (DPP) on base Regulation (EU) 2024/1781 (Ecodesign for Sustainable Products Regulation) and IoT carbon tracking.*

**Justification:** Incorporating ESG metrics links gas security to the EU Green Deal and climate objectives. DPPs enable transparent tracking of carbon intensity in gas flows, especially LNG imports. This supports compliance with the CSRD and facilitates access to sustainable finance instruments. It helps align risk group planning with broader environmental and economic goals. This also enhances regional accountability in the preparation of Preventive Action Plans.

## 4. Pilot Real-Time RegTech Dashboards for Gas Supply Supervision

**Amendment Proposal**, Recital or Article 7(2), or Annex I as optional coordination tool:

*Establish an EU-funded pilot in selected risk groups to deploy AI-powered RegTech dashboards linked to digital registries and ENTSOG infrastructure data.*



**Justification:** Real-time dashboards improve visibility over infrastructure status and allow automated alerts. This respond to issues raised in the Court of Auditors' 2024 report regarding manual burden and information gaps. Dashboards enable faster decisions during gas crises and improve oversight across borders. This support data-driven governance, which is a core element of the 2025 simplification agenda. Early pilots help identify best practices for scaling to the Union-wide energy supervision framework.

## 5. Harmonize e-Document Legislation for Emergency Gas Supply Corridors

**Amendment Proposal, Article 7(2), last sentence or footnote:**

*Require that Member States in each gas risk group adopt or align national legislation to ensure mutual recognition of digital transport documents according to the requirements of the Regulation (EU) 2020/1056, Electronic Freight Transport Information (eFTI), including the eFTI common data set and relevant data subsets. Additionally, mandate that principles for negotiable cargo documents—as developed by UNCITRAL and embodied in the electronic bill of lading (eBL)—are extended to cover all modes and types of cargo, not just maritime shipments.*

**Justification:** The eFTI Regulation (EU 2020/1056) establishes a framework for structured, machine-readable, and interoperable electronic transport documents across all relevant sectors and legal acts in the EU. By aligning national rules with the eFTI common data set and sectoral subsets, Member States enable seamless digital information exchange for all energy-related cargoes—pipelines, LNG, road, rail, or multimodal transport.

UNCITRAL's work on negotiable cargo documents (including the eBL) sets a global legal standard for digital document transferability and title of goods; extending these principles to all types of goods ensures that energy products—regardless of mode—can be efficiently rerouted, claimed, and tracked in emergencies. Legally valid, digital, and negotiable documents reduce delays, fraud risk, and legal uncertainty during supply crises, allowing automated and real-time crisis response. This harmonisation enables the practical use of digital-only documents for activating emergency supply corridors (Annex I), supporting the single market, and eliminating manual or paper-based bottlenecks. It strengthens EU energy

crisis preparedness and ensures that the full spectrum of digital freight innovations benefits the gas supply chain and all related logistics.

## 6. SME-Friendly Compliance Frameworks for Energy Sector Digitalization

**Amendment Proposal**, *Recital or Article 7 or 8, new clause:*

*Mandate that digital obligations introduced for gas risk groups include tiered compliance and support measures for SMEs, such as training and simplified interfaces.*

**Justification:** SMEs are essential in the energy supply chain, but risk exclusion due to technical complexity. Tiered requirements promote broad-based compliance and market access. Digital enablement supports the goals of the 2025 Competitiveness Compass. Including SMEs strengthens system resilience and prevents dominance by a few large actors. It also ensures fair distribution of digital transformation costs across the sector.

## 7. Mandate Use of LEI/vLEI for Trusted Entity Identification in Energy Security Processes

**Amendment Proposal**, *Article 7 or 8, new paragraph:*

*Require that all entities in regional risk group cooperation use Legal Entity Identifiers (LEI) and, where available, verifiable LEI (vLEI) for authentication and secure participation in digital systems.*

**Justification:** LEIs provide globally recognized, machine-readable entity identification. vLEIs, aligned with ISO 17442-3, support role delegation and cryptographic trust, ideal for digital energy governance. This ensures only authorized actors participate in regional emergency coordination. Adoption of LEI/vLEI supports interoperability across the eIDAS 2.0, ETDR, and DPP ecosystems. This raises the security baseline and legal traceability of digital infrastructure interactions.

To facilitate widespread adoption, targeted campaigns should be launched to raise awareness among energy sector entities about the benefits of LEI/vLEI, potentially offering simplified registration processes and clear guidance on their implementation. Furthermore, the regulation should explicitly detail how vLEI can enable automated verification of roles and

authorizations in critical energy transactions and data exchanges, thereby enhancing both security and operational efficiency.

## **8. Mandate the Use of Qualified Electronic Seals (e-seals) for Trusted Automation in Energy Crisis Documents and Data**

**Amendment Proposal, Article 7(2), or new Article 7(2b):**

*Require the use of qualified electronic seals (e-seals), in accordance with Regulation (EU) 2024/1183 (eIDAS 2.0), for digitally authenticating emergency communications, machine-generated data, and official documents within risk groups.*

**Justification:** e-seals ensure integrity, origin, and authenticity of data across Member States. They enable automated verification of sensor data (e.g. gas pressure alerts), documents, and control instructions. This have the same legal status as physical seals under eIDAS 2.0, improving trust in digital communications. This enhance cybersecurity, reduce fraud, and ensure machine-verifiable attribution of data. Widespread use supports resilience, especially in LNG-focused supply chains that rely on real-time logistics.

## Conclusion and Next Steps

DigitalTrade4.EU respectfully urges the **European Commission** to **incorporate the above recommendations** into the final version of the delegated regulation on gas supply risk groups. We firmly believe that the proposed amendments—cantered on **digital registries, interoperability, legal harmonization, ESG integration, real-time supervision, SME inclusion, and trusted digital identity**—will significantly enhance the regulation’s effectiveness, practical impact, and long-term resilience.

By embracing these changes, the Commission will ensure that the regulation not only addresses immediate energy security challenges but also supports the EU’s **strategic vision for a modern, competitive, and sustainable Single Market**. Leveraging platforms such as the **Digital Product Passport (DPP)** and incorporating leading-edge architectural principles from initiatives like the **proposed EU Trade Document Registry (ETDR)**, the EU will set a global benchmark for secure, transparent, and efficient cross-border energy cooperation.

Furthermore, these proposals will **accelerate digital transformation** across the energy sector, reducing administrative burden and regulatory fragmentation. By integrating **MLETR, eIDAS 2.0, and LEI/vLEI**, the regulation will foster greater legal certainty, trust, and speed in emergency communications and operational processes—especially critical during supply crises or fast-moving risk scenarios.

The incorporation of **ESG data, RegTech dashboards, and SME-friendly frameworks** will help the EU lead in sustainable and inclusive digitalization, preparing Member States and businesses for future ESG and compliance obligations while enabling innovation. Harmonizing e-document legislation and piloting new supervisory technologies will create a more agile, future-proof regulatory environment, able to respond rapidly to market and technological developments.

We encourage the Commission to initiate further consultations with Member States, regulators, industry representatives, and digitalization experts to refine and implement these proposals. We recommend:

1. Establishing **dedicated working groups** on digital registry interoperability, real-time supervision, and legal harmonization;
2. Launching one or more **cross-border pilot projects** for digital registry integration and RegTech dashboards within selected gas supply risk groups;
3. Developing clear **guidelines for SME participation** and support mechanisms for digital skills development in the energy sector;
4. Coordinating with related EU policy initiatives, such as the **Single Market Enforcement Task Force**, the **Data Act**, and the **Green Deal**, to ensure maximum alignment and synergies.

DigitalTrade4.EU stands ready to actively participate in these next steps—whether through technical working groups, public-private partnerships, or knowledge-sharing forums. We are committed to supporting the Commission and all stakeholders in making the EU a leader in secure, digital, and sustainable energy systems.

We thank the Commission for considering this comprehensive feedback and look forward to ongoing dialogue, collaboration, and the successful implementation of an ambitious and forward-looking regulation.

# Appendix 1. EU Green-Digital Trade Leadership Roadmap (DigitalTrade4.EU, 2025)

activity	objective	indicative metrics	tools/enablers
<b>1. EU-Singapore DTA &amp; Expand DEPA Partnerships</b>	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
<b>2. Implement Digital Product Passports (DPPs)</b>	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
<b>3. Fund Secure Digital Corridors in Asia</b>	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
<b>4. Harmonize Digital Standards (MLETR/eIDAS 2.0)</b>	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
<b>5. Implement LEI and vLEI for Supply Chain Trust</b>	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
<b>6. Launch Green-Digital Trade Academy</b>	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
<b>7. Integrate ESG into Trade Finance</b>	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
<b>8. Enforce Platform Interoperability</b>	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)
<b>9. Global Digitalisation Projects with EU Standards</b>	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
<b>10. Advance UNECE Transparency Protocols</b>	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
<b>11. Pilot CBAM-DPP Corridors</b>	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

*Table 1. The EU Green-Digital Trade Leadership Roadmap, as proposed by DigitalTrade4.EU, translates the recommendations in this document into actionable steps for the European Commission's "International Digital Strategy." The roadmap outlines strategic activities to strengthen global digital trade cooperation, enhance supply chain transparency, and align digital and sustainability objectives across borders. For instance, prioritizing digital trade agreements (Activity 1) and harmonizing digital standards (Activity 4) will facilitate cross-border interoperability, support SME participation in digital markets, and ensure alignment with global sustainability frameworks such as UNECE Recommendation No. 49 and the EU Green Deal.*