

Prepared by DigitalTrade4.EU



EU Green-Digital Trade Leadership: Pathways for Global Standards, AfCFTA & Mauritania Partnership

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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 **107 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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Glossary of Key Acronyms

AfCFTA	African Continental Free Trade Area
CBAM	Carbon Border Adjustment Mechanism
CEAP	Circular Economy Action Plan
CSRD	Corporate Sustainability Reporting Directive
DEPA	Digital Economy Partnership Agreement
DPP	Digital Product Passport
DTA	Digital Trade Agreement
eFTI	Electronic Freight Transport Information, Regulation (EU) 2020/1056
eIDAS 2.0	Electronic Identification, Authentication and Trust Services, Regulation (EU) 2024/1183
ESG	Environmental, Social, and Governance
ETDR	EU Trade Document Registry
FiDA	Financial Data Access (Proposal)
MFF	Multiannual Financial Framework
MLETR	UNCITRAL Model Law on Electronic Transferable Records
SME	Small and Medium-sized Enterprises
UNECE	United Nations Economic Commission for Europe
UNCITRAL	United Nations Commission on International Trade Law

Executive Summary

DigitalTrade4.EU commends the European Commission's **proactive stance** in advancing the dual green and digital transitions within its trade policy, as evidenced by the **Strategy for making the Single Market simple, seamless and strong (COM(2025) 500 final)**¹ and the "Call for Evidence" for the EU-Mauritania Fisheries Agreement.

Recent developments, including the **landmark EU-Singapore Digital Trade Agreement (DTA)**², underscore the EU's **leadership** in integrating **digital innovation** into global trade. Alongside this, the emerging **UNECE Recommendation No. 49 ("Transparency at Scale")**³ represents a **significant global framework** aligning with EU ambitions for **sustainable supply chains**. The DTA establishes **binding rules** for cross-border **data flows**, **e-signatures**, and **digital consumer protection**, setting a **precedent** for future EU trade negotiations and demonstrating the EU's capacity to shape **standards** that can integrate **sustainability goals**, as envisioned by frameworks like UNECE 49.

To further strengthen its **leadership** and bolster the **competitiveness** and **resilience** of the EU **Single Market**, DigitalTrade4.EU strongly advocates for enhanced **international coordination**, deeper **digital trade partnerships**—particularly in **Asia** through the **Digital Economy Partnership Agreement (DEPA)**⁴ and in **Africa** via the **African Continental Free Trade Area (AfCFTA) legal framework**⁵—and the promotion of global **interoperability** of legal

¹ 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

² European Commission. EU and Singapore sign landmark digital trade agreement (May 2025)
https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1152

³ 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>

⁴ Digital Economy Partnership Agreement (DEPA)

<https://www.mti.gov.sg/Trade/Digital-Economy-Agreements/The-Digital-Economy-Partnership-Agreement>

⁵ Tralac. African Continental Free Trade Area (AfCFTA) Legal Texts and Policy Documents

<https://www.tralac.org/resources/our-resources/6730-continental-free-trade-area-cfta.html>

frameworks, laws, and standards, including the **UNCITRAL Model Law on Electronic Transferable Records (MLETR)**⁶ and the **EU eIDAS Regulation (eIDAS 2.0)**⁷.

Financial support through the Multiannual Financial Framework (MFF) and leveraging tools like **Digital Product Passports (DPPs)**⁸ and **Carbon Border Adjustment Mechanism (CBAM)**⁹ incentives are **critical** to operationalize this strategy, ensuring a **seamless, sustainable, and rules-based global trade system**.

⁶ UNCITRAL. Model Law on Electronic Transferable Records

https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic_transferable_records

⁷ European Commission. Discover eIDAS

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

⁸ European Union. EU's Digital Product Passport: Advancing transparency and sustainability (September 2024)

<https://data.europa.eu/en/news-events/news/eus-digital-product-passport-advancing-transparency-and-sustainability>

⁹ European Commission, Taxation and Customs Union. Carbon Border Adjustment Mechanism (March 2025)

https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

Introduction

The global trade landscape is undergoing a **profound transformation**, driven by climate imperatives, rapid digitalisation, and evolving geopolitical dynamics. The European Union has positioned itself as a **leader** in navigating these changes, advocating for an **open, sustainable, and secure trade environment**. This commitment is clearly articulated in the Commission's "Strategy for making the Single Market simple, seamless and strong" which emphasizes leveraging the **full potential of the European market** to increase **productivity**, support the **clean transition**, and secure **strategic sovereignty and security**.

DigitalTrade4.EU, as a consortium dedicated to fostering the digital transformation of trade through harmonized standards, **fully aligns** with these objectives. These objectives include the **Competitiveness Compass**¹⁰'s focus on boosting productivity through digital innovation and green industrial policy. Our vision is a **seamlessly interconnected Europe** and neighbouring regions, powered by the digitalisation of trade documents and processes. The insights gathered from the "Call for Evidence" regarding the EU-Mauritania Fisheries Agreement further highlight the Commission's dedication to **stakeholder engagement** and ensuring **fair and balanced deals** in international agreements, aligning with the principles of sustainability and good governance.

This feedback document aims to provide **constructive recommendations** to the European Commission, building upon existing strategies and recent successes to accelerate the EU's green-digital trade agenda and reinforce its global influence.

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.

¹⁰ European Commission. Competitiveness compass. Our plan to reignite Europe's economy (January 2025) https://commission.europa.eu/topics/eu-competitiveness/competitiveness-compass_en

Expectations from the Commission's Side: The Objectives

The European Commission's objectives, as outlined in the provided documents, are **multi-faceted and ambitious**, reflecting a comprehensive approach to modernizing and strengthening the EU's trade and internal market policies.

From the "Call for Evidence" concerning the **EU-Mauritania Fisheries Agreement**, the Commission explicitly seeks to:

- **Help maintain the activity** of the EU's fleets and the **employment linked to the fleets**.
- **Promote resource and environmental sustainability** through rational and sustainable exploitation of living marine resources.
- **Support the development of a sustainable fisheries sector in Mauritania**.
- **Promote scientific research** to support sustainable fishing.
- Ensure the **evaluation and future negotiations** consider the **views of stakeholders**, aiming for a **fair and balanced deal** for both parties.
- Address the **practical need for EU action** to ensure continued fishing opportunities for the EU fleet in Mauritanian waters post-2026.

The "Single Market Strategy" outlines broader objectives for the European Market, emphasizing the need to:

- **Remove remaining barriers** and **expand the Single Market** to enhance market access, especially for SMEs.
- **Reinvigorate the vision** of a simple, fair, and seamless Single Market, providing **more free movement** and **more protection and empowerment**.
- Achieve **more effective digitalisation**, moving from a **document-based to a data-based Single Market**.

- **Simplify rules** to reduce costs, increase productivity, and improve the functioning of the Single Market, while **maintaining ambition on climate and sustainability**.
- Ensure **more effective implementation and enforcement** of Single Market rules.
- **Protect the European market** from unfair trade practices, external dependencies, and unforeseen global turbulence.
- **Modernize product legislation** to harness digitalisation, promote circularity, and strengthen safeguards, notably through the **Digital Product Passport (DPP)**.

These objectives collectively point towards a future where the EU's trade policy is **sustainable, digitally advanced, competitive, and resilient**, serving as a **powerful catalyst for growth and prosperity** while upholding its values and standards on the global stage.

Mauritania: Strengthening Cooperation through AfCFTA

Mauritania's engagement with the EU, particularly through the Sustainable Fisheries Partnership Agreement (SFPA), presents a unique opportunity to **deepen broader cooperation** in the context of Africa's evolving digital trade landscape. The **African Continental Free Trade Area (AfCFTA)**, having finalized its legal framework for digital trade, marks a **historic milestone** for the continent's economic integration¹¹.

This development is **highly relevant** for EU-Mauritania cooperation, as it provides a **robust legal and operational foundation** for enhanced digital trade within Africa, which can then be **leveraged for stronger ties with the EU**. For Mauritania, aligning its digital trade frameworks with AfCFTA protocols can:

- **Facilitate the digital transformation** of its economy, extending beyond the fisheries sector to other key industries.
- **Improve connectivity and interoperability** of digital systems, potentially creating more **seamless digital trade corridors** between Mauritania, other African nations, and the EU.
- **Attract greater foreign direct investment** in its digital infrastructure and services sector, aligning with the EU's strategic interest in supporting sustainable development in partner countries.
- **Enhance transparency and efficiency** in trade, including in the fisheries sector, by adopting modern digital tools and standards.

In summary, **AfCFTA** aims to create a **single continental market for goods and services**, with **digital trade protocols** designed to **reduce transaction costs** and **harmonize e-commerce regulations** across **54 African countries**.

¹¹ DigitalTrade4.EU. Historic Milestone in Africa's Digital Trade: AfCFTA Finalizes Legal Framework (February 2025)

<https://www.digitaltrade4.eu/historic-milestone-in-africas-digital-trade-afcfta-finalizes-legal-framework/>

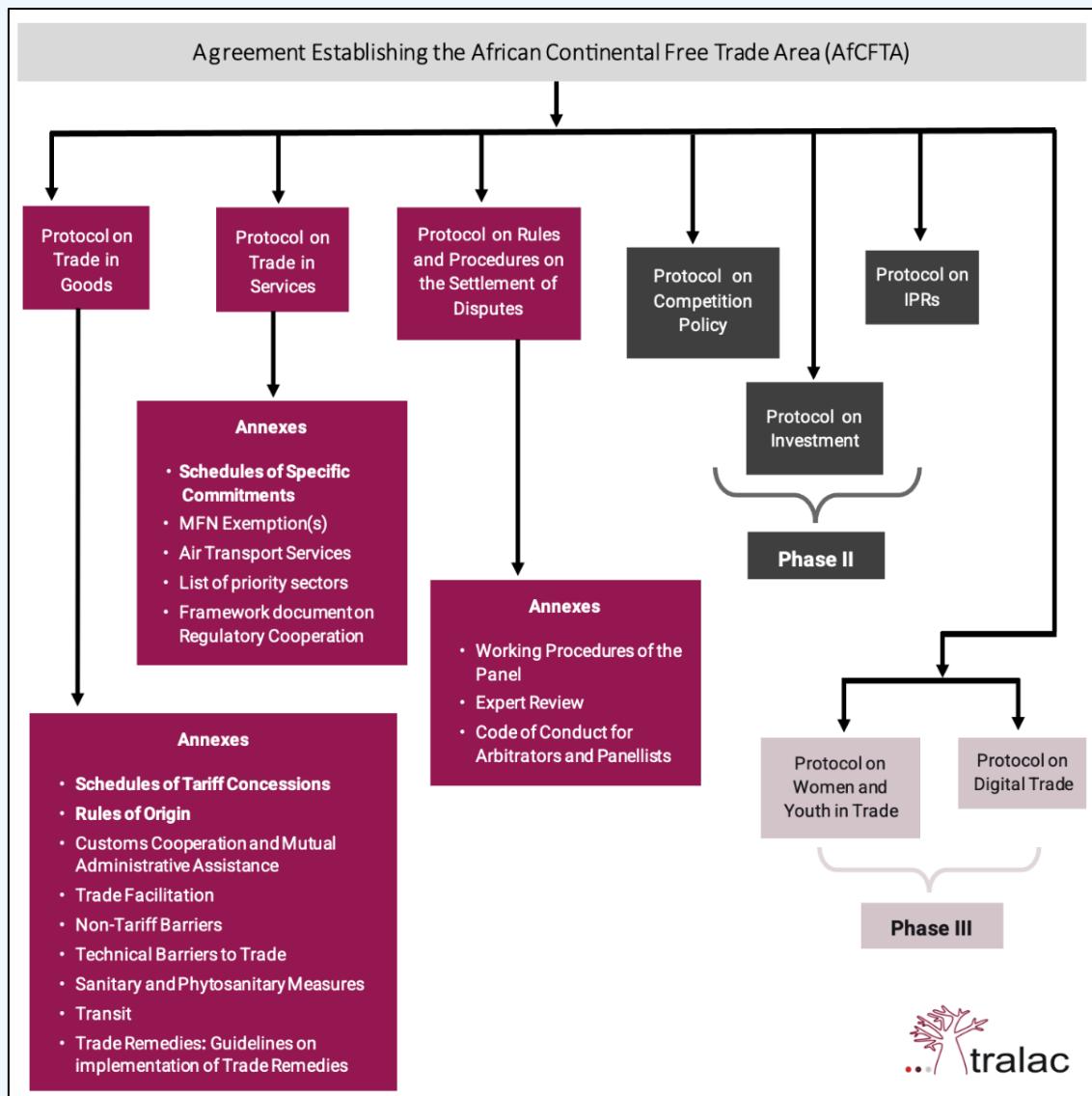


Figure 1. This diagram illustrates the structural framework of the AfCFTA Agreement, outlining its core protocols and associated annexes. Source/Author: tralac (Trade Law Centre)

The EU's focus on promoting sustainable fisheries in Mauritania can be **complemented and amplified** by supporting Mauritania's integration into the broader African digital trade ecosystem. This could involve:

- **Sharing expertise and best practices** in digital trade facilitation, e-governance, and cybersecurity, drawing from the EU's experience with frameworks like **eIDAS 2.0** and the **Digital Economy Partnership Agreements (DEPAs)**.
- **Providing technical assistance and capacity building** to help Mauritania align its national digital trade policies with both AfCFTA and EU standards.

- **Exploring pilot projects** that demonstrate the benefits of digital traceability and data exchange in the fisheries supply chain, potentially linking with the EU's **Digital Product Passport (DPP)** initiative.

By acknowledging and strategically engaging with Mauritania's position within the AfCFTA, the EU can **reinforce its commitment to mutually beneficial partnerships**, **foster sustainable economic growth** in the region, and **strengthen its overall leadership** in green and digital trade. **The structural framework underpinning this continental integration effort is depicted in Figure 1.**

Approach and Recommendations

DigitalTrade4.EU's approach is rooted in the belief that the EU's global leadership in trade can be **strengthened** by **integrating green and digital agendas** through **harmonized standards, strategic partnerships, and robust digital infrastructure**. Our recommendations are designed to complement the Commission's stated objectives and build upon the key developments highlighted in our input document.

1. Intensify International Coordination and Digital Trade Diplomacy

- **Deepen Digital Economy Partnership Agreements (DEPAs) and DTAs:** The EU-Singapore DTA is a **pivotal model**. The Commission should **actively pursue** similar high-standard agreements with other key partners in Asia-Pacific (e.g., **Japan, South Korea, Australia, New Zealand**) and, in parallel, **strengthen cooperation with African nations**. Leveraging DEPA and the EU-Singapore DTA as **modular templates**, these agreements must focus on facilitating secure cross-border data flows, e-identification, and cybersecurity while upholding EU privacy and cybersecurity standards, and promoting economic integration and digital transformation across continents. The success of the EU-Singapore DTA can serve as a **blueprint** for developing robust and mutually beneficial digital trade partnerships with African countries, promoting **economic integration** and **digital transformation** across both continents.

For example, replicating the DTA's provisions on data localization and digital customs cooperation could streamline trade with India, where regulatory fragmentation currently hinders SME participation.

- **Champion Global Interoperability of Laws and Standards:** The EU should strengthen its **advocacy** for global frameworks such as the **UNCITRAL Model Law on Electronic Transferable Records (MLETR)**, **EU eIDAS 2.0 Regulation**, and the **EU eFTI Regulation**. This involves actively promoting their **international alignment** to enable the **seamless digitalisation of freight transport information** across **borders** and **regulatory systems**. Greater **legal interoperability** will enhance **legal certainty** for **businesses** and **consumers**, **streamline cross-border processes**, and eliminate **unnecessary barriers to digital trade**. Analysis by DigitalTrade4.EU highlights **MLETR's critical role** in

boosting **legal certainty**, fostering **interoperability**, and empowering **SMEs** in the **digital economy**.

- **Leverage UNECE Recommendation No. 49 ("Transparency at Scale"):** This global framework for **Digital Product Passports (DPPs)** and traceability of sustainability data **perfectly aligns** with the EU's vision. The Commission should **promote its widespread adoption** and integrate its principles into trade agreements to **embed green standards** across supply chains and reinforce mechanisms like the **EU Carbon Border Adjustment Mechanism (CBAM)**.

2. Accelerate the Implementation of Green-Digital Tools and Infrastructure

- **Prioritize Digital Product Passports (DPPs):** The DPP is a **cornerstone** of the EU's sustainable trade agenda. By embedding unique digital IDs in products, DPPs enable real-time tracking of environmental impact, repair history, and recycling pathways, aligning with the Circular Economy Action Plan (CEAP)¹². The Commission should **expedite its rollout** across relevant product categories, ensuring it becomes the **main tool for disclosing and sharing product information**, including **carbon footprint** and **sustainability credentials**. This will foster **transparency**, **combat greenwashing**, and facilitate compliance with EU Green Deal regulations like the Corporate Sustainability Reporting Directive (CSRD).
- **Invest in Secure Digital Corridors and Interoperable Platforms:** As highlighted in our "Funding the Future" section, the MFF should **prioritize investments** in digital infrastructure in Asia and beyond, funding **secure digital corridors** and **interoperable DPP platforms**. Co-financing digital customs systems and blockchain-based traceability tools will **enhance efficiency and resilience** of supply chains.
- **Integrate ESG into Trade Finance:** The Commission should actively promote the **digitalisation of trade finance** to support the EU's ESG, CSRD, and CS3D objectives. By **simplifying reporting obligations** and linking trade finance to sustainability metrics (e.g., via **FiDA APIs** enabling automated ESG reporting and green loan approvals), the

¹² European Commission, Environment. Circular economy action plan
https://environment.ec.europa.eu/strategy/circular-economy-action-plan_en

EU can provide **additional funding at cheaper rates** for companies boosting their ESG performance, thereby **increasing EU competitiveness** and **resilience**.

3. Strengthen Support for SMEs and Capacity Building

- **Dedicate Resources for SME Upskilling:** A significant portion of the MFF should be allocated to upskilling EU and international SMEs on DPP compliance, carbon accounting, and e-signature adoption. Initiatives like a "Green-Digital Trade Academy" under Erasmus+ can **train officials and businesses** on emerging standards, ensuring **inclusive participation** in the green and digital transitions.
- **Simplify Regulatory Burdens:** As the "Single Market Strategy" notes, SMEs are most affected by regulatory fragmentation. The Commission should **continue its efforts to reduce red tape** through "Omnibus packages" and ensure the "**think small first**" **principle** is consistently applied in legislation. **Digitalisation initiatives** like the European Business Wallet and the Single Digital Gateway will **further reduce administrative burdens**.

4. Enhance Enforcement and Governance

- **Proactive Enforcement of Single Market Rules:** The Commission's commitment to "more effective implementation and enforcement" is **crucial**. DigitalTrade4.EU supports a **proactive and strategic enforcement agenda**, including systematic investigations and coordinated infringement procedures where necessary, to **prevent new barriers and ensure uniform application** of rules.
- **Establish a Robust Governance Framework:** A **modernized and digitalized European Market framework** by 2030 requires clear governance roles, secure technological infrastructure, and effective international agreements. The concept of an **EU Trade Document Registry (ETDR)**, built on a qualified electronic ledger, would be **transformative** for verified cross-border trade documents and DPPs.

Conclusion and Next Steps

The European Union stands at a **critical juncture** where its commitment to a **simple, seamless, and strong Single Market** can be profoundly amplified by its leadership in green and digital trade. The integration of environmental goals with digital transformation, as championed by the Commission and echoed by DigitalTrade4.EU, is **not merely a regulatory necessity but a strategic imperative** for enhancing the EU's **competitiveness, resilience, and global influence**.

The **EU-Singapore Digital Trade Agreement (DTA)** and the growing adoption of **Digital Product Passports (DPPs)**, supported by global standards like **UNECE Recommendation No. 49**, demonstrate a **clear roadmap** for the future. To translate this vision into concrete action, DigitalTrade4.EU urges the Commission to:

1. **Intensify international coordination** to deepen digital trade partnerships and champion global interoperability of laws and standards.
2. **Prioritize funding and policy support** for the development and widespread adoption of green-digital trade infrastructure and tools, particularly DPPs and digital trade finance solutions.
3. **Continue simplifying regulatory frameworks** and provide targeted capacity building for SMEs to ensure an inclusive transition.
4. **Strengthen enforcement mechanisms** to ensure a truly unified and effectively functioning Single Market for green and digital trade.

By embracing these recommendations, the European Commission can **accelerate the twin transition**, ensuring that trade digitalisation benefits the **planet, people, and prosperity equally**, and solidify the EU's position as a **global leader** in shaping the future of sustainable and digitally-driven commerce. DigitalTrade4.EU remains **committed to collaborating** with the Commission and all stakeholders to achieve these shared objectives.

To **implement** the roadmap outlined on **page 13**, DigitalTrade4.EU proposes establishing a **biannual EU–Africa Digital Trade Forum** to review progress on **AfCFTA alignment**, along with creating a **~€500 million Digital Trade Innovation Fund** under the **Multiannual Financial Framework (MFF)**.

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.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - ~€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.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - €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.	<ul style="list-style-type: none"> - 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)
8. Global Digitalisation Projects with EU Standards	Extend EU digital infrastructure and norms globally.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - 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.	<ul style="list-style-type: none"> - 20% CBAM compliance cost reduction - 50% DPP adoption by 2030 	IoT carbon trackers, CBAM rebate schemes, EU Customs Single Window

Table 1. The roadmap above, DigitalTrade4.EU's input to the European Commission's "International Digital Strategy" operationalises the recommendations outlined in this document. For instance, Activity 1 (EU-Singapore DTA & Expand DEPA Partnerships) directly supports the harmonisation of international digital standards, while Activity 8 (Global Digitalisation Projects with EU Standards) aligns with efforts to promote dual-use infrastructure globally. These activities collectively reinforce the EU's ability to leverage digital trade diplomacy as a tool for both economic growth and strategic security.