Prepared by DigitalTrade4.EU

Integrating Digital Trade Infrastructure into the Union Civil Protection Mechanism

Feedback to the European Commission on COM(2025) 548 final

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-objectivesof-the-eu-competitiveness-compass/

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1. Executive Summary

DigitalTrade4.EU welcomes the European Commission's proposal COM(2025) 548 final¹, which establishes a new Regulation on the **Union Civil Protection Mechanism (UCPM)** and **Union support for health emergency preparedness and response**. We strongly support the Commission's ambition to strengthen Europe's **strategic autonomy**, improve **cross-sectoral crisis preparedness**, and deliver **effective**, **rapid**, **and coordinated disaster response**.

The proposal rightly highlights the importance of solidarity, readiness, and transnational coordination in times of crisis. However, in a world increasingly shaped by digital systems, physical logistics must be backed by resilient and legally-recognised digital infrastructure. This is not only necessary to secure faster crisis response but also to reduce risks of fragmentation and improve data-based decision making across Member States.

We believe the Union Mechanism can act as a flagship for embedding trusted digital identity, traceability, and interoperability into EU-wide emergency systems. By integrating mechanisms such as verifiable Legal Entity Identifiers (vLEI), Digital Product Passports (DPP), and support for the UNCITRAL Model Law on Electronic Transferable Records (MLETR)², the UCPM can reinforce preparedness, responsiveness, and the digital single market.

Our feedback offers concrete regulatory amendments to help embed digital legal trust, real-time coordination capabilities, and dual-use innovation into the UCPM. These changes will ensure that the UCPM does not only respond to crises but helps prevent and manage them proactively through interoperable, secure, and legally harmonised digital infrastructure.

This feedback proposes ways to align the Regulation more closely with the **Preparedness Union Strategy**, enhance digital interoperability across critical EU infrastructures, and ensure synergies with related EU frameworks, including **eFTI**, **Digital Product Passports (DPPs)**, **eIDAS 2.0**, and **MLETR**. We argue that the Regulation should explicitly integrate **trusted digital identity**, **legal entity authentication**, **dual-use infrastructure**, and **decentralised architectures**, which are essential for resilience, security, and real-time coordination.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14524-EUs-next-long-term-budget-MFF-EU-funding-for-civil-protection-preparedness-and-response-to-crises en

² UNCITRAL. Model Law on Electronic Transferable Records https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic transferable records

2. Introduction

DigitalTrade4.EU is a consortium, dedicated to building interoperable, secure, and legally harmonised digital trade infrastructure. We believe that Europe's civil protection and health emergency capabilities can only be effective if they are embedded in a data-driven Single Market supported by trusted digital identity, real-time legal entity verification, and cross-border legal recognition of digital documents.

Key Recommendations:

- 1. Introduce **verifiable legal identity** (vLEI) requirements for economic operators participating in cross-border civil protection operations.
- 2. Ensure interoperability between UCPM crisis data and eFTI, DPP, Customs Single Window, and Import Control System 2 (ICS2).
- 3. Integrate **Digital Product Passports** (DPPs) for traceability of emergency and defence-critical goods.
- 4. Support the creation of **decentralised digital infrastructure** with funding under rescEU and preparedness components.
- 5. Promote the adoption of the **UNCITRAL MLETR** legal framework to enable legal certainty in cross-border digital documentation.

We provide concrete **amendment proposals** to support the Regulation's alignment with these frameworks.

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.

3. Strategic Digital Models for Sustainable Trade and Logistics

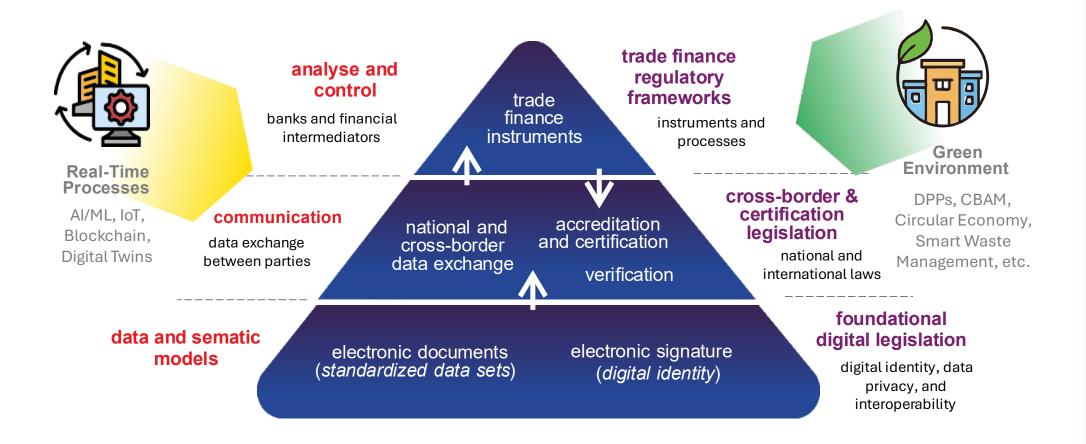


Figure 1: Vedler, R. This visual model bridges the European Commission's strategic objectives with the proposed regulatory and operational solutions, illustrating how digital requirements and compliance mechanisms can be implemented in a technologically neutral and future-proof manner. All digital requirements and compliance mechanisms must remain technologically neutral and future-proof, allowing companies to select and reuse their preferred IT solutions. Icons by Flaticon.

4. Proposed Amendments to the Implementing Regulation and Annexes

4.1. Verifiable Legal Entity Identity (vLEI) in Civil Protection Data Exchange

Proposed Legal Text, Annex, Section 3, new point under (m) Preparedness Actions:

Ensuring that all legal entities involved in cross-border civil protection deployments, supply chain logistics, or coordination activities are identified using **verifiable Legal**Entity Identifiers (vLEI) in accordance with ISO 17442 and Regulation (EU) 2024/1183 (eIDAS 2.0).

Justification: The use of vLEI significantly improves the authenticity, integrity, and trustworthiness of actors involved in emergency response. It enables real-time verification of the legal status, registration, and roles of all entities handling critical assets or participating in coordination. Embedding vLEI ensures compliance with eIDAS 2.0 and promotes synergies with financial, defence, and transport identity standards. This strengthens accountability across both public and private stakeholders operating within cross-border disaster logistics. The measure also supports rapid verification in time-sensitive crises, allowing for faster clearance and coordination. This amendment also addresses the Regulation's objective of effective cross-border interoperability and crisis coordination, particularly where rapid mobilization and access to sensitive infrastructure are needed.

4.2. Interoperability with eFTI, DPP and ICS2

Proposed Legal Text, Annex, Section 3 (o) Preparedness Actions:

Ensuring technical interoperability of the Union Mechanism's digital platforms with existing Union-wide digital compliance systems, including Electronic Freight Transport Information (eFTI) in accordance with Regulation (EU) 2020/1056, Digital Product Passports (DPPs) as supported by Regulation (EU) 2024/1781 (ESPR), the Import

Control System 2 (ICS2), and the **EU Customs Single Window**, to enable seamless data sharing in emergencies.

Justification: The Commission emphasizes seamless data exchange and interoperability in the Preparedness Union Strategy. UCPM digital systems must be connected to eFTI, DPP, ICS2, and customs platforms to enable frictionless information sharing during emergencies. Real-time access to structured and verified supply chain data improves logistics reliability, enhances customs risk assessment, and reduces administrative burden. ICS2 provides advance cargo information, improving situational awareness for emergency responders. Such interoperability also minimizes redundancy between digital systems and increases response speed. This also aligns with the Commission's goals for technological flexibility, resilience, and cost-effective crisis response.

4.3. Legal Certainty via MLETR Adoption

Proposed Legal Text, Annex, Section 4, Response Actions:

Ensuring legal certainty and cross-border recognition of emergency-related digital documentation (e.g., electronic transport documents, e-certificates) in line with the UNCITRAL Model Law on Electronic Transferable Records (MLETR).

Justification: MLETR provides a harmonised framework for the legal recognition of electronic transferable records, which is essential in cross-border civil protection and health emergencies. The ability to issue, transfer, and enforce legal documents digitally ensures that critical goods and services are not delayed by paper-based processing or inconsistent legal interpretations. This is particularly vital in situations involving medical supplies, fuel shipments, or high-value relief equipment. Integration of MLETR also supports alignment with trade partners that have adopted similar frameworks, reducing barriers at EU external borders. This aligns with the Commission's objective to simplify and digitise the Union Mechanism's legal and operational framework, while also promoting international legal harmonisation.

4.4. Dual-Use Infrastructure Funding under rescEU

Proposed Legal Text, *Annex, Section 3, point (n):*

Development of **dual-use digital infrastructure** (e.g., quantum-secure communication networks, decentralised identity systems, blockchain-based traceability) to support both civilian emergency operations and defence logistics, to be eligible for funding under rescEU.

Justification: The Joint White Paper on European Defence Readiness 2030³ and the Preparedness Union Strategy⁴ both call for civil-military synergies and joint preparedness infrastructure. Investing in dual-use technologies enables better asset sharing, reduced duplication, and interoperability between humanitarian and defence systems. Quantum-secure communications and distributed ledgers offer high levels of security and auditability for cross-border operations. By recognising such infrastructure as eligible under rescEU⁵, the Commission can stimulate innovation and reduce silos between civilian and military preparedness. This approach contributes directly to the Union's strategic autonomy, enhances supply chain resilience, and futureproofs EU-wide crisis infrastructure.

4.5. Recognition of Negotiable Cargo Documents

Proposed Legal Text, Annex, Section 4, Response Actions:

Facilitating recognition and legal effectiveness of **Negotiable Cargo Documents** in digital form, as endorsed in the United Nations General Assembly Resolution on the Promotion of Negotiable Cargo Documents (A/RES/79/240), in alignment with international trade law and the UNCITRAL MLETR.

Justification: The adoption of digital **Negotiable Cargo Documents**⁶ enables faster, more secure, and legally recognized transfer of title for goods across borders. Their international endorsement by the UN General Assembly in July 2025 underlines their relevance for trade,

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³ European Commission. Joint White Paper for European Defence Readiness 2030 (March 2025) https://defence-industry-space.ec.europa.eu/document/download/30b50d2c-49aa-4250-9ca6-27a0347cf009 en?filename=White%20Paper.pdf

⁴ 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-

⁵ European Commission, European Civil Protection and Humanitarian Aid Operations. rescEU, What is it? https://civil-protection-humanitarian-aid.ec.europa.eu/what/civil-protection/resceu_en

⁶ United Nations. Draft UN Convention on Negotiable Cargo Documents to modernize and digitize global trade finalized (July 2025)

https://unis.unvienna.org/unis/en/pressrels/2025/unisl378.html

customs, and emergency logistics. These documents provide verifiable and transferable evidence of ownership, which is vital when handling medical equipment, energy supplies, or strategic stockpiles. Their use can streamline customs procedures and facilitate cross-border delivery under stress conditions. It also complements the Regulation's objective of enhancing supply chain resilience and international legal harmonisation, while supporting the broader EU goal of enabling trusted, paperless trade environments.

5. Interoperability Ecosystem for EU Digital Trade and Customs Integration **Economic Operators** Accredited Labs & Manufacturers. Logistics **Authorities Importers & Exporters Providers DPP Platforms Permit Registries** eFTI Platforms **CBAM Registries Service Providers** veterinary, chemical, product lifecycle data electronic freigh phytosanitary, etc. linked indentifiers for transport information **Trade Documents** traceability and inter-• real-time accessible to certificates Registries operability real-time verification authorities and authorized • ESG, CE compliance by public and private business partners Etc. \leftrightarrow supports digital signing and actors information verification of eFTI data **Competent Authorities Import Control Systems 2 (ICS2)** pre-arrival risk assessment system Market Customs Survelliance Authorities

Figure 2. Vedler, R. This diagram illustrates the key platforms, data flows, and stakeholder interactions across the EU's digital trade and customs ecosystem. It highlights how manufacturers, logistics providers, and regulatory systems connect through structured data platforms—such as eFTI, Digital Product Passport, and EU Customs systems—while integrating with trusted external sources including TRACES, REACH-IT, EUDAMED, and digital identity services. All data exchange and processing within this ecosystem strictly adhere to the principles of the General Data Protection Regulation (GDPR), ensuring lawful, transparent, and purpose-limited handling of personal and sensitive data.

EU Customs Single Window

• integrated entry point for customs formalities

Authorities

6. Conclusion and Next Steps

We urge the Commission to fully integrate digital trade principles and infrastructure into the revised Union Civil Protection Mechanism. By adopting the amendments proposed above, the Regulation will:

- Become more interoperable and technologically future-proof
- Reduce legal fragmentation and improve cross-border coordination
- Enhance **security**, **trust**, and **efficiency** in emergency response
- Reinforce the EU's global leadership in green-digital transformation, resilience, and crisis preparedness

Next Steps:

- We propose initiating a structured dialogue between DG ECHO, DG MOVE, DG TAXUD, and DigitalTrade4.EU on integrated digital crisis readiness.
- We recommend establishing joint pilot projects in 2026 under Horizon Europe and rescEU to operationalise the integration of vLEI, MLETR, and DPP into crisis response.
- DigitalTrade4.EU stands ready to provide technical specifications, simulation frameworks, and contribute to governance models under the proposed Crisis Coordination Hub.

We remain at your disposal to contribute further through consultation rounds, technical working groups, and real-life testing environments.

Appendix 1. 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 ofe-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

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.

Appendix 2. Digital Trade & Capital Markets Integration Roadmap (DigitalTrade4.EU, 2025)

#	activity	objective	indicative metrics	tools/enablers
1	Establish EU Trade Document Registry (ETDR)	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 clearance30% reduction in VAT fraudFull 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 ofe-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

Appendix 3. 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.	Logistics providers, freight forwarders, customs brokers, software vendors	Connected to ICS2, Customs Single Window, DPP	Signing-enabled, eIDAS/vLEI, traceable submission logs
2	DPP Platform	Digitally represents product lifecycle data, compliance (CE, ESG), and traceability information.	Manufacturers, importers/exporters, ESG auditors, platform providers	Linked to eFTI, permit registries, eInvoicing, CBAM Registries, and customs declarations.	Verifiable ESG/CE data
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/permit info	Real-time validation
5	Permit Registries	Hosts and validates official permits and certificates (e.g. veterinary, phytosanitary, chemical).	National competent authorities (e.g. TRACES, ECHA), EU agencies	Linked from DPP & eFTI	Real-time verifiability
6	Business Wallet	Decentralised environment for securely holding and sharing credentials and electronic documents (data sets) under user control.	Traders, SMEs, logistics operators, authorised representatives, identity providers	Interacts with all above	vLEI identity, eIDAS 2.0
7	Trade Documents Registry (TDR)	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, and linkages 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, MLETR compliance, supports traceable audit trails
8	CBAM Registries	Record and manage embedded carbon emissions data for imported goods subject to the EU Carbon Border Adjustment Mechanism. Provide CO ₂ reporting, verification and certification infrastructure aligned with customs and sustainability frameworks.	Importers, customs authorities, national CBAM authorities, accredited CO₂ verifiers, ESG auditors	Linked with DPP for product-level emission data, Customs Single Window for compliance validation, and trade finance systems for tariff adjustments.	Verified emission declarations, EU-accredited verifier network, secure transmission to customs