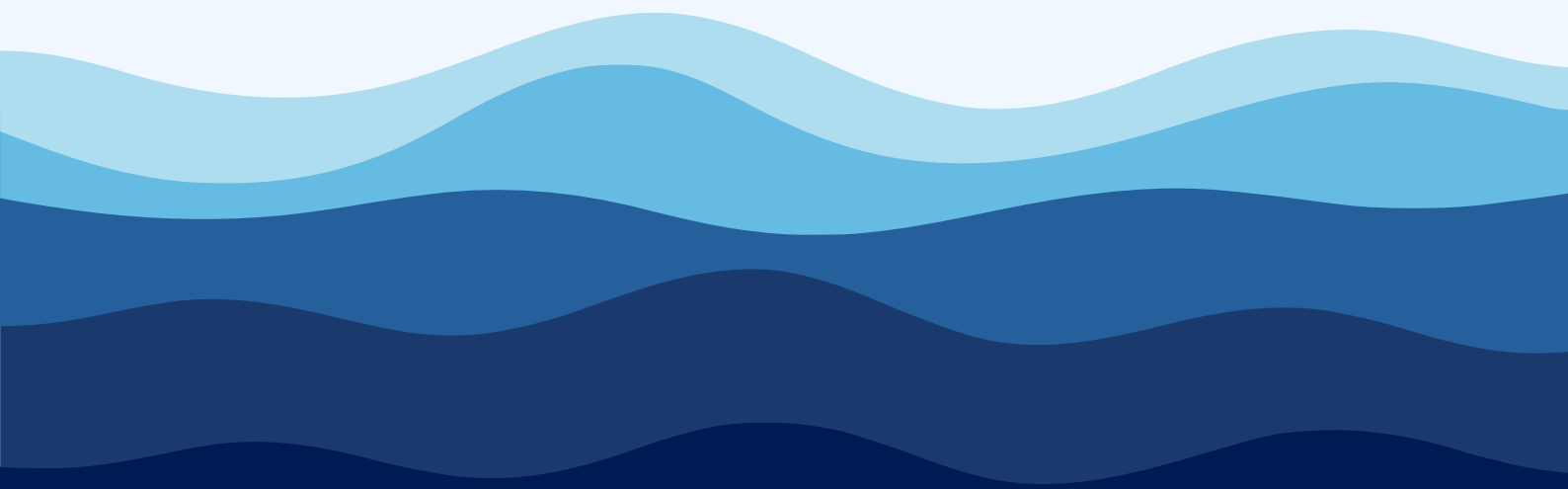


Prepared by DigitalTrade4.EU



Strengthening EU Trade and Investment through Proportional Regulation for Small Mid-Cap Enterprises

Feedback to the EU Commission

August 2025

1. Introduction

The European Union is pursuing a strategic agenda that combines competitiveness, sustainability, and digitalisation, while ensuring a fair and resilient Single Market. In this context, the European Commission's 2025 Omnibus package (COM(2025) 501 final and SWD(2025) 501 final) introduces an essential extension of existing SME-focused simplification measures to small mid-cap enterprises (SMCs). This initiative is directly aligned with the objectives of the **European Trade Indexes Registry (EUTIR)** and responds to stakeholders' calls for greater proportionality in regulatory obligations.

By reducing administrative burdens and adapting compliance requirements, the proposal ensures that SMCs—companies that have outgrown SME thresholds yet still face similar structural challenges—are better integrated into the Union's trade and investment framework. This approach strengthens their capacity to scale, innovate, and access international markets, while also safeguarding key EU policy priorities such as data protection, fair trade defence, financial transparency, environmental sustainability, and climate objectives.

In addition, the initiative reflects the broader role of the EUTIR as a future **reference hub for trade indexes, compliance data, and sustainability metrics**. For example, simplified data protection compliance can be linked with EUTIR digital tools for cross-border operations; trade defence adjustments can be embedded into EUTIR's monitoring indexes to ensure transparency; while battery and F-gas reporting requirements can feed into EUTIR datasets that support the EU's green transition. By embedding these reforms into the Union's regulatory architecture and linking them with the EUTIR environment, the proposal ensures that small mid-cap enterprises can act as drivers of transformation across Europe's industrial ecosystems and global trade networks.

The proposed alignment between SME and SMC provisions not only enhances the efficiency of Union legislation, but also reinforces the Union's ability to promote a level playing field for enterprises of different sizes. In doing so, the Commission ensures that SMCs remain competitive actors in global value chains and contribute to the Union's long-term economic

resilience. This document builds on that logic and situates the planned measures within the broader expectations of the **European Trade Indexes Registry**, creating a coherent framework that balances regulatory proportionality with the Union’s strategic ambitions.

1.1. Shared Interests between the 2025 Omnibus Package and EUTIR Priorities

Omnibus Package Measures	Role of EUTIR (European Trade Indexes Registry)	Shared Interests
GDPR simplification (record-keeping only in case of high risk; derogation extended up to 750 employees)	EUTIR could host a Digital Compliance Index , linking data protection simplifications to cross-border digital trade benchmarks.	Facilitates proportional compliance monitoring while supporting smooth digital services trade within and beyond the EU.
Trade defence helpdesk extended to SMCs (Regulations 2016/1036 & 2016/1037)	EUTIR can integrate a Trade Defence Index , tracking anti-dumping/subsidy measures and SMC access to remedies.	Enhances transparency of trade defence cases, ensuring fair market access for SMCs.
Prospectus Regulation alleviation (EU Growth issuance prospectus also for SMCs)	EUTIR could feature a Capital Market Access Index , monitoring simplified issuance and sustainability-linked prospectuses.	Improves access to sustainable finance and boosts investor confidence by aligning disclosures with EU green finance metrics.
Batteries Regulation adjustments (due diligence reports every 3 years)	EUTIR can include a Sustainability & Circularity Index , aggregating compliance data on eco-design and lifecycle reporting.	Supports the green transition by reducing duplication while ensuring data-driven monitoring of environmental impact.
F-gas Regulation simplification (registration limited to relevant imports/exports)	EUTIR could host a Climate Compliance Index , tracking emissions-related registrations and exemptions.	Ensures proportional enforcement while keeping climate ambition intact, improving regulatory predictability for SMCs.
General principle: extending SME mitigations to SMCs	EUTIR can serve as a Proportionality Dashboard , consolidating indicators on reduced administrative burdens.	Aligns simplification efforts with transparent monitoring, demonstrating EU’s commitment to balanced regulation.

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 GLEIF², 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**

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-based³ 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

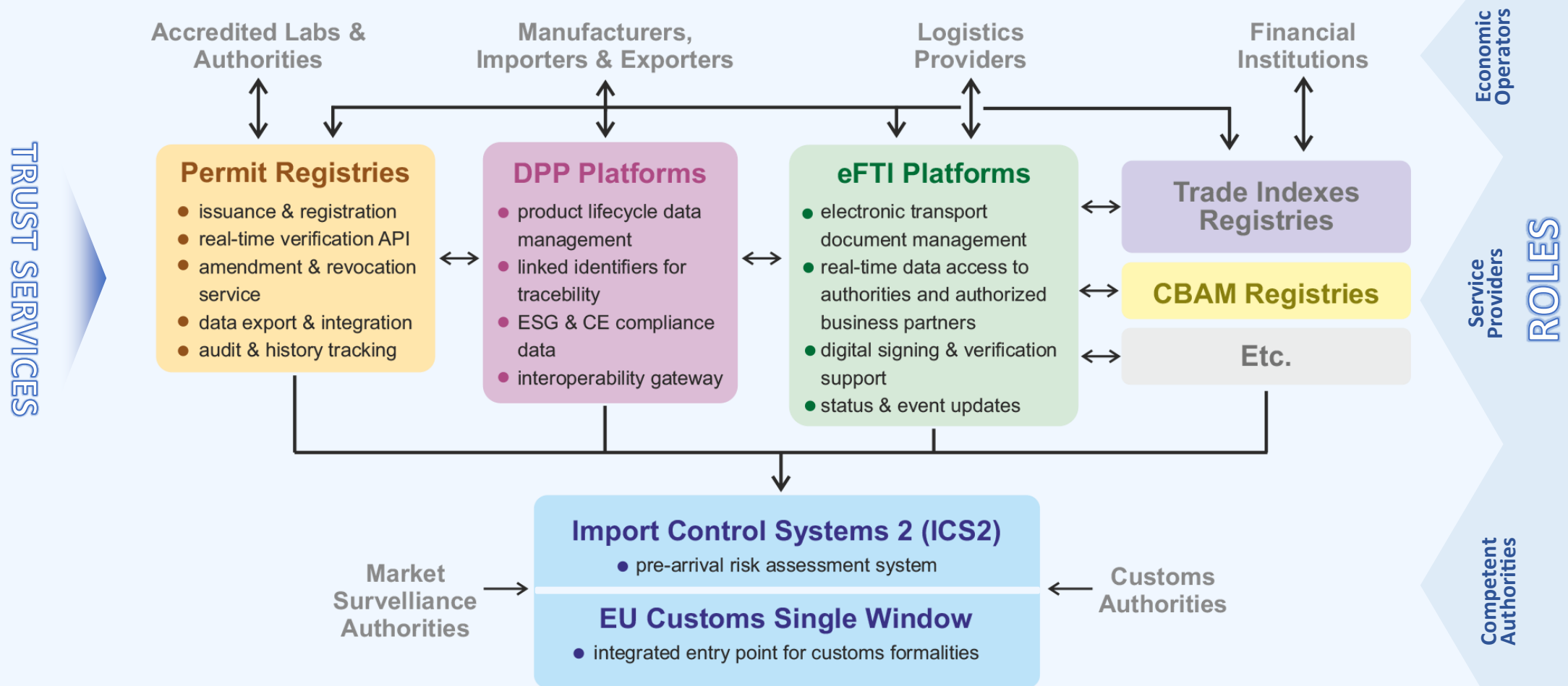


Figure 1. This diagram illustrates the key platforms, data flows, and stakeholder interactions across the EU's digital trade and customs ecosystem. It shows how manufacturers, logistics providers, and regulatory systems connect through structured data platforms—such as eFTI, the Digital Product Passport, 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:

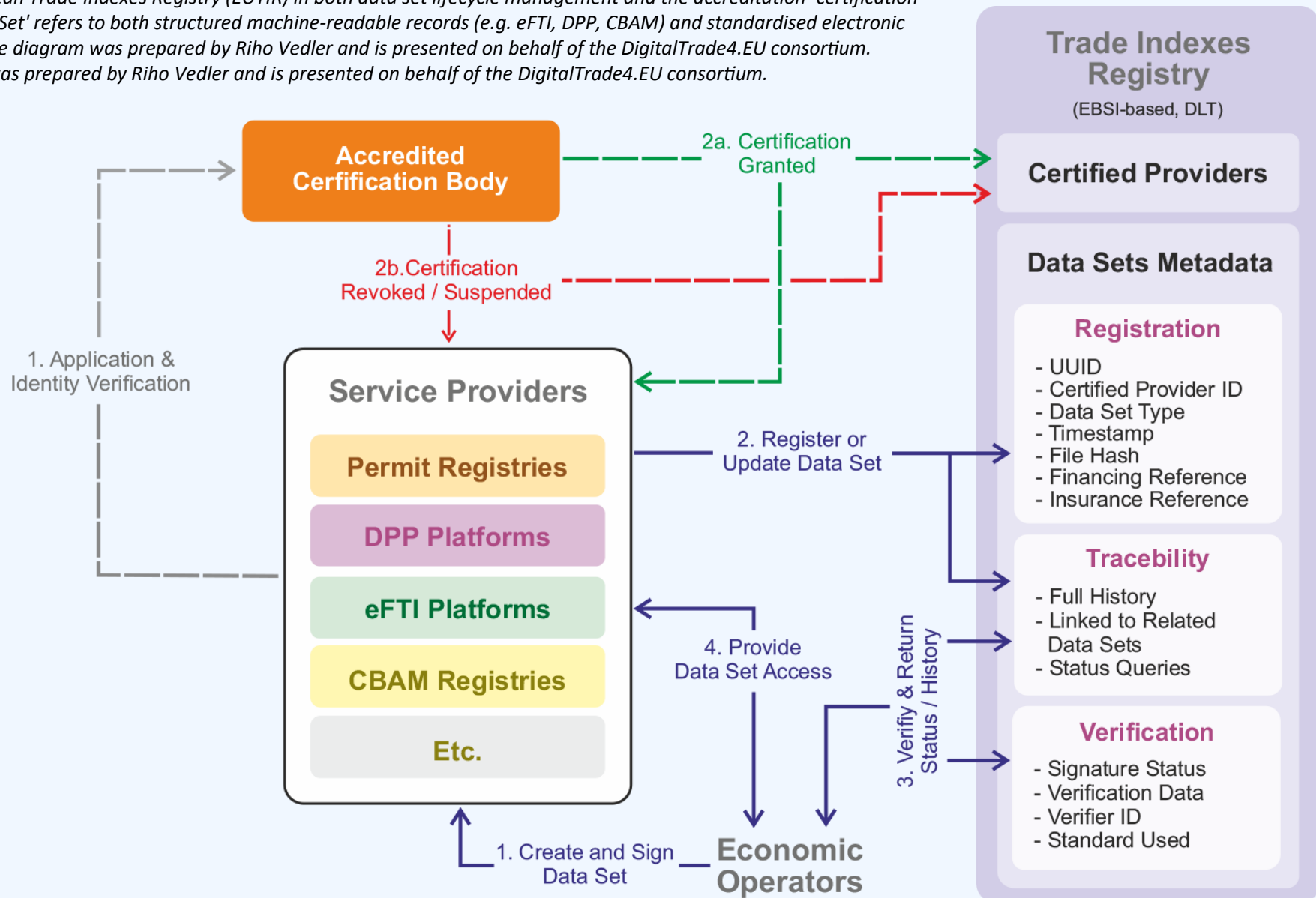
- **Regulation (EC) No 765/2008** – establishes EU accreditation framework; relevant for recognising Certified Providers in EUTIR.
- **Decision No 768/2008/EC** – harmonised rules for product marketing and conformity assessment bodies.
- **Regulation (EU) 2019/1020** – market surveillance and product 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. The diagram was prepared by Riho Vedler and is presented on behalf of the DigitalTrade4.EU consortium.



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

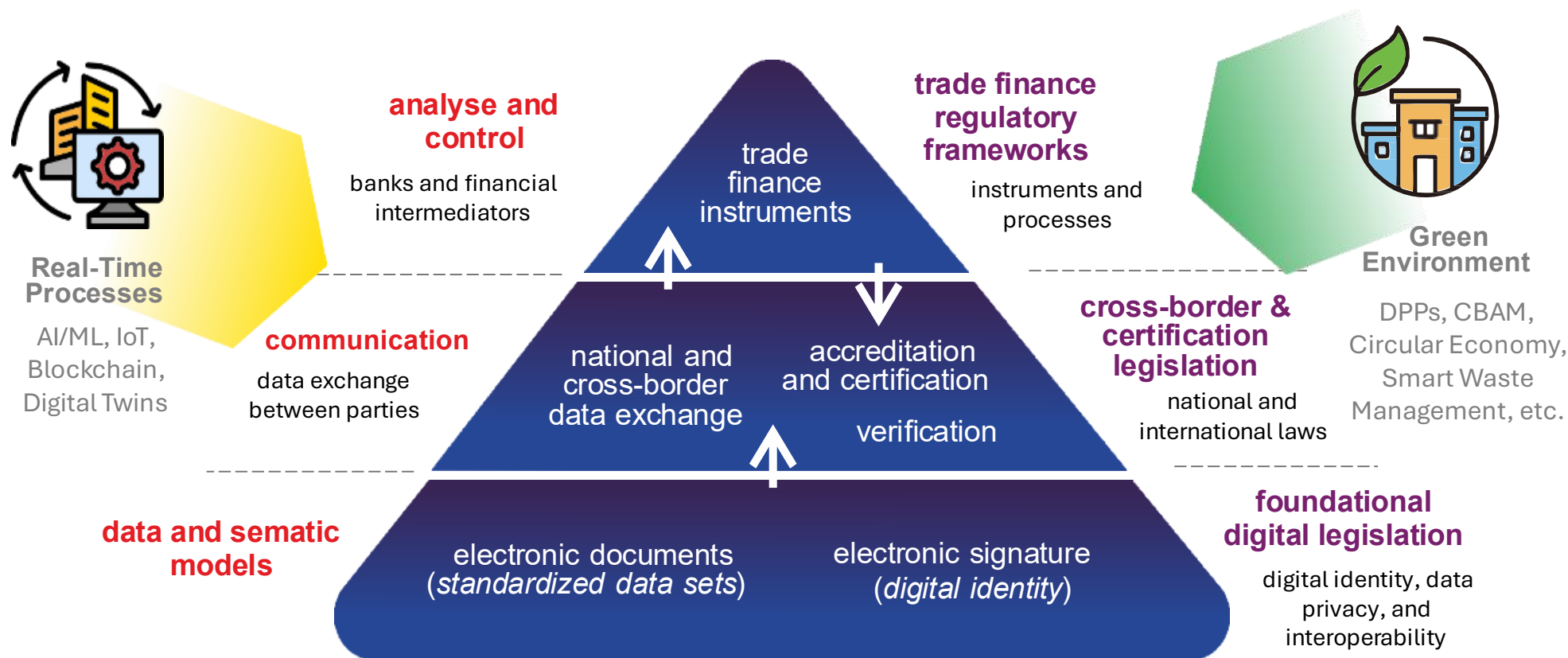


Figure 3 This visual model bridges the European Commission's strategic objectives with the proposed regulatory and operational solutions, illustrating how digital requirements and compliance mechanisms can be implemented in a technologically neutral and future-proof manner. All digital requirements and 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. Digital Trade Facilitation in GDPR

Proposed Legal Text, Regulation (EU) 2016/679 (GDPR), Article 30(5):

*Add a recital clarifying that **simplified record-keeping rules for small mid-cap enterprises (SMCs) shall be linked to the European Trade Indexes Registry (EUTIR) Digital Compliance Index, ensuring proportionality in compliance while supporting transparent cross-border data flows.***

Justification: The current omnibus proposal reduces GDPR obligations, but without a centralised tracking tool, its long-term impact remains unclear. Linking simplified compliance to EUTIR creates a digital registry of proportionality indicators, ensuring transparency for regulators and businesses. It allows monitoring of whether simplified regimes maintain trust in personal data handling across borders. This strengthens both the Single Market's integrity and EUTIR's role as a facilitator of digital trade.

6.2. Sustainable Finance in Prospectus Regulation

Proposed Legal Text, : Regulation (EU) 2017/1129 (Prospectus Regulation), Article 15a:

*Extend the alleviated EU Growth issuance prospectus to SMCs, with an option to register voluntary sustainability disclosures under the **EUTIR Capital Market Access Index.***

Justification: Simplified issuance procedures are vital for smaller enterprises, but they risk losing visibility in capital markets without adequate sustainability signalling. By embedding sustainability-linked prospectuses into EUTIR, investors can access a reliable database of mid-cap issuers demonstrating ESG performance. This enhances market transparency and helps channel capital into sustainable projects. It ensures that reduced red tape is not achieved at the expense of investor confidence, fully aligning with EU climate and finance strategies.

6.3. Green Transition in Batteries Regulation

Proposed Legal Text, Regulation (EU) 2023/1542 (Batteries), Article 52:

*Extend the due diligence reporting cycle for SMCs from three years to five years, provided reporting data is uploaded to the **EUTIR Sustainability & Circularity Index**.*

Justification: Longer reporting cycles reduce unnecessary administrative costs, but the EU must still ensure continuous oversight of environmental performance. By linking extended deadlines to mandatory uploads into EUTIR, regulators gain ongoing access to harmonised data without burdening enterprises with frequent submissions. This transforms compliance into a data-driven monitoring system, ensuring that climate and circular economy goals remain intact. It also promotes trust that proportionality does not weaken the EU's environmental leadership.

6.4. Trade Defence and Investment Helpdesk

Proposed Legal Text, Regulations (EU) 2016/1036 and 2016/1037:

*Transform the SME Trade Defence Helpdesk into an **SME/SMC Trade & Investment Helpdesk**, integrated into the **EUTIR Trade Defence Index** for transparency of anti-dumping, subsidy, and investment screening procedures.*

Justification: Trade defence cases and investment screenings are highly technical, and SMCs often lack the resources to follow them. By embedding the helpdesk and related case indexes in EUTIR, mid-sized firms gain one-stop access to guidance, support, and monitoring tools. This ensures they can defend their market access rights effectively and equally compared to larger players. At the same time, policymakers gain a registry-based dataset for tracking the participation of smaller firms in EU trade defence actions.

6.5. Proportional Enforcement in F-gas Regulation

Proposed Legal Text. Regulation (EU) 2024/573, Article 20(4)(a):

*Introduce a **de minimis exemption for SMCs** trading low volumes of products containing F-gases, provided related transactions are recorded in the **EUTIR Climate Compliance Index**.*

Justification: The principle of proportionality requires distinguishing between large-scale and small-scale actors in climate regulation. A de minimis exemption prevents excessive administrative burden while retaining oversight through EUTIR. This ensures small-scale

activities are captured in aggregate data, even if not fully regulated at the same level as major market players. The amendment strengthens both environmental protection and competitiveness by ensuring enforcement is risk-based and data-driven.

6.6. Embedding EUTIR Environment into Simplification Measures

Proposed Legal Text, New recital to COM(2025) 501 final:

The European Trade Indexes Registry (EUTIR) shall serve as a centralised digital environment for hosting SME and SMC simplification measures, including indexes for compliance, sustainability, capital market access, trade defence, and climate obligations.

Justification: Currently, simplification efforts are fragmented across regulations and agencies, creating uncertainty for enterprises. Establishing EUTIR as the single-entry point ensures all proportionality measures are visible, accessible, and tracked under one framework. It reduces duplication of reporting, increases regulatory coherence, and supports data-driven policymaking. This not only strengthens the legal certainty of SMCs but also enhances the EU's credibility in delivering on competitiveness, sustainability, and transparency goals simultaneously.

6.7. Integration of EORI, LEI and vLEI identifiers into EUTIR

Proposed Legal Text, New recital and technical annex to COM(2025) 501 final:

The European Trade Indexes Registry (EUTIR) shall integrate existing identification systems, including the Economic Operators Registration and Identification (EORI), the Legal Entity Identifier (LEI), and its verifiable form (vLEI), in order to provide a unified identity framework for enterprises across trade, financial, and sustainability reporting domains.

Justification: Fragmented identification systems currently require enterprises to duplicate registration processes across trade, customs, financial, and regulatory environments. By integrating EORI, LEI, and vLEI into EUTIR, the Union creates a single digital identity layer that ensures interoperability and trust across regulatory and market infrastructures. This strengthens legal certainty and reduces costs for enterprises by eliminating multiple

identifiers, while also improving supervisory efficiency through a consolidated dataset. Furthermore, the link with vLEI ensures compatibility with eIDAS 2.0 digital identity standards, positioning the EU as a global leader in trustworthy digital trade frameworks. This amendment makes EUTIR not only a registry of indexes but also the backbone of identity in European and international trade.

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 CEFAC, 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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