Feedback to the European Commission on Strengthening EU Leadership in Green-Digital Trade

June 2025

About Us

The **DigitalTrade4.EU consortium** envisions a **seamlessly interconnected Europe** and **neighbouring regions** powered by harmonized standards for the digitalisation of trade documents and processes. By fostering the digital transformation of trade, we aim to promote economic integration, enhance cooperation, and ensure long-term trade facilitation across borders.

Our consortium is made up of **experts in their field**, including **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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Executive Summary

This document provides feedback from the **DigitalTrade4.EU consortium** to the **European Commission** concerning the advancement of the **EU's leadership in green and digital trade**.

It addresses the objectives outlined in the Commission's recent **Omnibus proposals** (COM(2025) 503 final, related to amending directives and regulations for digitalisation and common specifications) and aligns them with the strategic recommendations put forth by the **DigitalTrade4.EU consortium**.

The **DigitalTrade4.EU** consortium strongly supports the Commission's drive towards **digitalisation**, **simplification** of reporting requirements, and the introduction of **common specifications** as a fallback to **harmonised standards**. These initiatives are crucial for reducing **administrative burdens**, enhancing the **competitiveness** of **EU businesses**, particularly **SMEs**, and fostering a '**digital by default**' environment. Our recommendations focus on ensuring these transitions are **harmonised globally**, support **sustainability objectives**, and are implemented with robust **financial and capacity-building support**.

We emphasize the importance of **international coordination**, deepening **digital trade partnerships** (notably in Asia via **DEPA**, considering global partner strategies like ASEAN's own 2045 vision for a resilient, innovative, dynamic, and people-centred community), and championing the **global interoperability of legal frameworks and standards** such as the **UNCITRAL Model Law on Electronic Transferable Records (MLETR)[1]** and the **EU's eIDAS 2.0 Regulation[2]** (on electronic identification and trust services for electronic transactions in the internal market). The **EU-Singapore Digital Trade Agreement (DTA)[3]** and **UNECE Recommendation No. 49 ("Transparency at Scale")**[4] for **Digital Product Passports (DPPs)** are seen as key positive developments that reinforce the EU's approach. We believe a concerted effort in these areas, informed by global partner strategies, will solidify the EU's position as a **global leader** in the intertwined **green and digital trade transformations**.

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[1] UNCITRAL. Model Law on Electronic Transferable Records
https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic_transferable_records
[2] European Commission. Discover eIDAS
https://digital-strategy.ec.europa.eu/en/policies/discover-eidas
[3] Digital Economy Partnership Agreement (DEPA)
https://www.mti.gov.sg/Trade/Digital-Economy-Agreements/The-Digital-Economy-Partnership-Agreement
[4] 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

Introduction

The **DigitalTrade4.EU consortium** is dedicated to fostering a seamlessly interconnected Europe and neighbouring regions through **harmonised standards** for the **digitalisation of trade documents and processes**. Our aim is to promote **economic integration**, enhance cooperation, and ensure long-term **trade facilitation** across borders.

This feedback is submitted in response to the European Commission's ongoing efforts to shape the future of EU trade policy. We strongly commend the Commission's proactive stance, as reflected in the recent **Single Market Strategy (COM(2025) 500 final)[5]** and the related Omnibus proposals, and offer our expertise and collaborative support. The Strategy's vision for a **simple, seamless, and strong** Single Market powerfully reinforces our core objectives.

We particularly welcome the Commission's commitment to a **paradigm shift** from a **document-based to a data-based Single Market**, a crucial step for modern trade. The strategic focus on **more effective digitalisation** to speed up business, **simplification** to reduce red tape, and the development of **harmonised standards** is perfectly aligned with our mission. Initiatives such as the **Digital Product Passport (DPP)**, the digitalisation of the **Declaration of Conformity[6]**, and the move towards **digital instructions for use** are practical, impactful measures that will reduce **administrative burdens** and enhance the **competitiveness** of EU businesses. By embracing a **'digital by default'** environment and ensuring the **interoperability** of digital solutions, the EU is paving the way for a more efficient and resilient trade ecosystem.

This document outlines our perspective on these shared objectives and presents our strategic recommendations for translating these ambitions into concrete, globally-interoperable actions that benefit EU businesses and citizens.

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[5] 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

[6] Your Europe. Technical documentation and EU declaration of conformity https://europa.eu/youreurope/business/product-requirements/compliance/technical-documentation-conformity/index_en.htm

Expectations from the Commission's Side: The Objectives

The **European Commission's Omnibus proposals** (COM(2025) 503 final and related documents) clearly articulate a strategic direction aimed at **modernising** the EU's regulatory landscape for products, with a strong emphasis on **digitalisation** and **streamlining processes**. The **DigitalTrade4.EU consortium** has analysed these proposals and identifies the following key objectives and expectations from the Commission's side:

- **Reduction of Administrative Burdens and Simplification:** A core objective is to **rationalise and simplify reporting requirements** for businesses, aiming for a significant reduction (25%) in **administrative burdens** without compromising policy goals. This includes moving away from outdated paper-based processes.

- **Embracing Digitalisation ('Digital by Default'):** The Commission champions the **'digital by default' principle**, seeking to make EU policies inherently digital-ready. This involves:

  - Transitioning reporting to **digital** formats **based on standardised data**.

  - Mandating that the **EU Declaration of Conformity** be drawn up in **electronic form** and made accessible via an internet address or **machine-readable code**.

  - Allowing manufacturers the option to provide **instructions for use in a digital format**, while ensuring **essential safety information** remains accessible (e.g., in paper for consumers or upon request) and clearly defining how users can access digital instructions and request paper copies.

  - Requiring a **digital contact** (e.g., email, online portal) for manufacturers on products to facilitate swifter communication with authorities and end-users.

  - Ensuring **electronic exchange of information** (e.g., technical documentation, conformity assessments) between economic operators, notified bodies, and competent national authorities.

- **Enhancing Interoperability and Cohesion:** Addressing the challenges posed by **fragmented IT ecosystems** and inefficient data exchanges is a priority. The upcoming

European Business Wallets and the **Digital Product Passport (DPP)** are highlighted as key enablers for **seamless** and interoperable digital interactions and data sharing. The proposals aim to ensure that where a DPP is mandated by other Union legislation for a product, the information required in the EU Declaration of Conformity and instructions can be provided solely within that DPP, avoiding duplication.

- **Strengthening Market Surveillance and Compliance:** **Digitalisation** is expected to enhance the effectiveness of market surveillance by enabling faster access to compliance information and facilitating the tracing of non-compliant products.

- **Introducing Common Specifications:** To address situations where **harmonised standards** are non-existent, unavailable, insufficient, or urgently needed, the Commission proposes the introduction of **common specifications** as an alternative. This aims to:

  - Provide businesses with **legal certainty** and a clear path to demonstrate compliance.

  - Ensure a uniform approach to the definition, legal effect, adoption conditions, and procedure for these **common specifications** across various product legislations.

  - Serve as an exceptional **fall-back solution** to facilitate manufacturers' compliance with essential health, safety, and other requirements.

- **Modernising Sector-Specific Legislation:** The **Omnibus proposals** amend a wide array of directives (e.g., on noise emission, hazardous substances, recreational craft, pressure vessels, electromagnetic compatibility, measuring instruments, lifts, radio equipment, marine equipment) to align them with these overarching **digitalisation and simplification** objectives. For instance, in the marine equipment sector, the obligation for a paper copy of the Declaration of Conformity on board an EU ship is proposed to be satisfied by uploading it to the European Maritime Safety Agency's database.

The **DigitalTrade4.EU consortium** views these objectives as highly pertinent and aligned with the needs of modern trade. We believe their successful implementation will significantly contribute to the **EU's competitiveness** and its leadership in the digital era.

Approach and Recommendations

The **DigitalTrade4.EU consortium** is committed to supporting the **European Commission** in achieving its vision for a competitive, green, and digitally advanced European trade landscape. Our approach, detailed in our "**Strengthening EU Leadership in Green-Digital Trade: Key Developments and Strategic Recommendations**[7]" (May 2025) input, is founded on the principles of **interoperability**, **sustainability**, and **international cooperation**. We note significant parallels and opportunities for synergy with the strategic visions of key partners, such as **ASEAN's "ASEAN 2045: Our Shared Future[8],** which also prioritizes resilience, innovation, dynamism, and a people-centred approach, with strong emphasis on digital transformation and sustainable development.

Our strategic pillars and recommendations:

1. Championing Global Interoperability of Laws and Standards

- **Alignment with International Frameworks:** We strongly advocate for the EU to continue aligning its trade policies with established and emerging global digital standards, such as the **MLETR**, which provides a legal framework for the use of electronic transferable records, and the **EU's eIDAS Regulation**, which establishes a basis for electronic identification and trust services for electronic transactions within the EU and increasingly influences international norms. This is crucial for ensuring **seamless cross-border data flows**, **mutual recognition** of e-identification and trust services, and robust **cybersecurity**, all while upholding the EU's high **privacy standards**. The Commission's move towards digital declarations of conformity and electronic instructions is a positive step in this direction. The appetite for such harmonisation is evident in regional goals, like ASEAN's own objective to become a "*leading and connected Digital and Technological Community with open and interoperable, secure and trusted digital ecosystem.*"

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[7]   https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14589-International-Digital-Strategy/F3552794_en

[8] Association of Southeast Asian Nations. 2045 Our Shared Future (May 2025) https://asean.org/book/asean-2045-our-shared-future/

> **Recommendation:** **DigitalTrade4.EU** recommends that the Commission actively promotes the **adoption** and **mutual recognition** of these **standards** in all **bilateral** and **multilateral trade negotiations** and **partnerships**. **Pilot projects**, particularly with key **Asian trading partners** who are advancing their **digital infrastructure** and **regulatory frameworks** (e.g., for **digital payments**, **cybersecurity**, and **cross-border data flow**), should be funded to test and demonstrate the **practical benefits** of **interoperability** based on these frameworks. **ASEAN's 2045 vision**, which prioritizes a **resilient, innovative, and people-centred digital ecosystem**, closely mirrors the **EU's objectives**, creating a **natural synergy** for **joint initiatives** in **standards harmonization** and **sustainable trade practices**.

2. Deepening Digital Trade Partnerships, Especially in Asia

- **Leveraging Agreements like the EU-Singapore DTA:** The **EU-Singapore Digital Trade Agreement (DTA)** [9] serves as an excellent model. It not only facilitates trade with a key digital hub but also exports EU regulatory standards and values.

- **Expanding DEPA Engagement:** The **Digital Economy Partnership Agreement (DEPA)** [10] offers a flexible plurilateral platform for deepening digital cooperation with Asia-Pacific nations.

> **Recommendation:** The Commission should intensify efforts to **expand its network of high-standard digital trade agreements**, using the EU-Singapore DTA as a template. Engagement with **DEPA** should be deepened, encouraging further accession by key Asian partners and aligning DEPA's modules with EU priorities. **Collaboration should also be sought with ASEAN as a bloc**, aligning with their "**ASEAN Connectivity Strategic Plan** [11]" which focuses on digital innovation and seamless logistics, to foster a harmonized digital trade environment.

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[9] European Commission. Joint Statement by Commissioner Maros Šefčovič and Singapore Minister-in-charge of Trade Relations Grace Fu on the signature of the EU-Singapore Digital Trade Agreement
https://ec.europa.eu/commission/presscorner/detail/fr/statement_25_1147
[10] Digital Economy Partnership Agreement (DEPA)
https://www.mti.gov.sg/Trade/Digital-Economy-Agreements/The-Digital-Economy-Partnership-Agreement
[11] Association of Southeast Asian Nations. ASEAN Connectivity Strategic Plan   (May 2025)
https://asean.org/asean-connectivity-strategic-plan/

3. Integrating Sustainability through Digital Traceability

- **Digital Product Passports (DPPs):** We fully support the EU's vision for **DPPs** as a cornerstone of **supply chain transparency** and **sustainability**, aligning with initiatives like **UNECE Recommendation No. 49 ("Transparency at Scale")**[12]. DPPs, carrying verifiable data on a product's composition, origin, and environmental impact, are essential for the **circular economy** and for mechanisms like **CBAM**.

- **Trade Finance and ESG:** **Digitalisation of trade finance** is key to supporting the **EU's environmental, social, and governance (ESG)** goals (Corporate Sustainability Reporting Directive (CSRD), Corporate Sustainability Due Diligence Directive (CSDDD)). Linking finance to verifiable sustainability data (e.g., through DPPs) can incentivize greener practices and simplify reporting.

> **Recommendation:** The Commission should **accelerate the rollout of DPPs**, ensuring they are built on **open, interoperable standards**. Funding should be allocated to support **SMEs** in adopting DPPs and related **carbon accounting tools**. Furthermore, policy frameworks should be developed to better integrate **digitalised trade finance with ESG compliance**, potentially offering preferential terms for businesses demonstrating strong sustainability performance through verifiable digital means. Collaboration with Asian partners on sustainable finance taxonomies and DPP interoperability, considering regional partners' focus on sustainable infrastructure and circular economy, should be a priority.

4. Prioritising Investment and Capacity Building (MFF 2026-2034)

- **Digital Infrastructure:** We propose significant allocation under **NDICI-Global Europe** (~€2 billion) to fund **secure digital corridors** and **interoperable DPP platforms** with Asian partners.

- **SME Support:** Dedicate substantial funds (~€800 million via **COSME**) for upskilling EU and partner country **SMEs** in DPP compliance, carbon accounting, and e-signature adoption. Launching a **Green-Digital** Trade Academy under **Erasmus+** would further

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[12] 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

build capacity, echoing regional partners' focus on developing a highly skilled and competitive labour force.

- **Standards Harmonisation:** Fund **pilot projects** (~€500 million) to align digital trade rules with **MLETR** and **eIDAS 2.0**, and establish an EU-Asia Digital Standards Taskforce.

> **Recommendation:** The upcoming **Multiannual Financial Framework (MFF)** must reflect these priorities to provide the necessary financial impetus for the **green-digital transition in trade**. Support should also be extended to key partner nations in Asia to facilitate their alignment with these global standards, fostering a more cohesive global trade environment.

5. Ensuring Platform Interoperability and Digital Sovereignty

- **Avoiding Vendor Lock-in:** The Commission should ensure that **dominant online platforms allow interoperability** with third-party applications, **empowering SMEs** and strengthening the EU's **digital sovereignty**, in line with recent **Court of Justice of the European Union (CJEU)** rulings (e.g., Case C-233/23[13]).

> **Recommendation:** Actively enforce **interoperability requirements** to foster a competitive and innovative digital ecosystem that supports, rather than hinders, the integration of new digital trade solutions. This is crucial for both EU and Asian SMEs seeking to participate in the digital economy.

6. Global Digitalisation Projects with EU Standards

- **Extending EU Frameworks:** Continue to co-fund **digitalisation projects** in non-EU countries, leveraging EU standards and technical frameworks (e.g., financed by **CEF**, **Digital Europe Programme**) to promote **global interoperability** aligned with EU regulatory and sustainability goals. Partners' own initiatives for digital transformation and smart cities present opportunities for such collaborative projects.

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[13] Judgment of the Court (Grand Chamber) of 25 February 2025.
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62023CJ0233

> **Recommendation:** These projects should explicitly integrate EU-led standards like **DPPs** and **eIDAS 2.0** from their inception, promoting a common language for digital trade and sustainability.

The approach and recommendations outlined by **DigitalTrade4.EU** are designed to complement and reinforce the Commission's objectives. We believe that by focusing on **global standards**, **strategic partnerships** (including with blocs like ASEAN that share similar long-term visions for digital and sustainable development), **sustainable practices enabled by digital tools**, and **targeted funding**, the EU can effectively navigate the complexities of modern trade and solidify its leadership in the green and digital domains.

Conclusion

The **DigitalTrade4.EU consortium** commends the **European Commission** for its forward-looking **Omnibus proposals**, which signal a strong commitment to **modernising EU trade through digitalisation and simplification**. The objectives of reducing **administrative burdens**, promoting **digital-by-default** practices, enhancing **interoperability** through tools like the **Digital Product Passport**, and providing **legal certainty** via **common specifications** are well-aligned with the needs of a competitive and resilient European economy.

Our consortium's recommendations, centred on fostering **global interoperability of standards** (such as the **UNCITRAL MLETR** and the **EU's eIDAS Regulation**), deepening **strategic digital trade partnerships** (particularly with Asia through **DEPA** and by engaging with regional visions like ASEAN's 2045 goals), integrating **sustainability with digital tools** (**DPPs**, **green trade finance**), and ensuring robust **financial support and capacity building**, are designed to amplify the impact of the Commission's initiatives. We believe that the **EU-Singapore Digital Trade Agreement** and the principles of **UNECE Recommendation No. 49** provide excellent foundations upon which to build, further strengthened by the shared ambitions for digital and sustainable futures seen in key partner regions.

DigitalTrade4.EU stands ready to **collaborate closely** with the **European Commission** and other **stakeholders** to translate these **shared ambitions** into **tangible outcomes**. We urge the Commission to establish a **dedicated task force** to oversee the **implementation** of the **roadmap** by **Q4 2025**, including **pilot programs** with **ASEAN** and **DEPA partners** to **demonstrate early successes**.

By working together to create a **harmonised, efficient, and sustainable global trade ecosystem**, we can ensure the **EU remains at the forefront** of the **green and digital transitions**, delivering prosperity and resilience for its businesses and citizens. We look forward to continued dialogue and partnership in this critical endeavour.

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. 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
6. 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
7. Enforce Platform Interoperability	Prevent vendor lock-in and empower SMEs.	- 100% compliance with CJEU rulings by 2026 - 50% reduction in platform dominance	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.	- 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.	- 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.	- 20% CBAM compliance cost reduction - 50% DPP adoption by 2030	IoT carbon trackers, CBAM rebate schemes, EU Customs Single Window

Table 1. This table was developed in the context of DigitalTrade4.EU's input to the European Commission's "International Digital Strategy" reflection on Europe's role in global economic governance and digital regulation. It presents a forward-looking Green-Digital Trade Leadership Roadmap that aligns EU digital trade policy with its twin transition goals.

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

activity	objective	indicative metrics	tools/enablers
1. Establish EU Trade Document Registry (ETDR)	Centralize and secure cross-border trade/ESG data for supervision	- 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

Table 2. This table was developed as part of DigitalTrade4.EU's contribution to the European Commission's public consultation on the "EU Savings and Investments Union: Regulation fostering EU market integration and efficient supervision." The roadmap demonstrates how legislative alignment (e.g. MLETR, eIDAS 2.0), digital tools (e.g. ETDR, DPPs), and incentives (e.g. ESG-linked finance) can reduce fragmentation, improve cross-border supervision, and support both the Green Deal and the Capital Markets Union.