Input on the Regulation Proposal Amending Wine Sector Rules (COM(2025) 137 final) and Green-Digital Trade Leadership Vision

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 **105 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 presents feedback from **DigitalTrade4.EU** in response to the European Commission's proposal **COM(2025) 137 final** concerning the **wine sector**, and more broadly, in contribution to the EU's strategy for **green and digital trade**. DigitalTrade4.EU commends the Commission's efforts to address the **structural challenges** within the wine sector, particularly its focus on enhancing **competitiveness**, managing **production potential**, and adapting to **climate change** and evolving **consumer demands**.

We believe that the objectives outlined for the wine sector align significantly with DigitalTrade4.EU's vision for a **seamlessly interconnected Europe** powered by **harmonized standards** for the **digitalisation of trade**. Our recommendations focus on leveraging **digital tools** and **green principles** to support the Commission's aims. Key proposals include the strategic implementation of **Digital Product Passports (DPPs)** for enhanced **transparency** and **sustainability** in the wine supply chain, the promotion of **global interoperability** of digital trade standards (such as **MLETR** and **eIDAS 2.0**), and targeted investments in **digital infrastructure** and **SME upskilling**. By integrating **green-digital solutions**, the EU can bolster the **resilience** and **competitiveness** of its wine sector while advancing its **leadership in sustainable global trade**.

*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.*

Introduction

DigitalTrade4.EU is dedicated to fostering the **digital transformation of trade** to promote **economic integration**, enhance **cooperation**, and ensure **long-term trade facilitation**. We welcome the European Commission's proactive stance in supporting the EU wine sector through the proposed regulation **COM(2025) 137 final**, dated March 28, 2025.

The challenges faced by the wine sector—**declining consumption**, **climate change impacts**, and the need for **enhanced competitiveness**—are significant. The Commission's proposal rightly identifies the need for measures that support **production potential management**, **market adaptation**, and **innovation**.

This feedback aims to highlight the **synergies** between the Commission's objectives for the wine sector and DigitalTrade4.EU's broader strategy for strengthening **EU leadership in green-digital trade**, as detailed in our May 2025 input ("*Strengthening EU Leadership in Green-Digital Trade: Key Developments and Strategic Recommendations[1]*"). We believe that a concerted focus on **digital transformation** and **sustainability** can provide powerful tools to achieve the desired outcomes for the wine industry and beyond.

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

Expectations from the Commission's Side: The Objectives for the Wine Sector

The Commission's proposal (**COM(2025) 137 final**) clearly articulates the pressing challenges and strategic objectives for the EU wine sector. We acknowledge and support these key aims:

- **Addressing Structural Challenges:** The proposal recognizes the impact of **declining wine consumption**, **unpredictable production** due to climate change, **oversupply**, and subsequent **pressure on prices**.

- **Enhancing Competitiveness and Resilience:** A core objective is to help the wine sector become **more competitive**, manage **production potential effectively**, explore **new market opportunities**, and increase its **resilience** against **climate change** and **shifting market dynamics**.

- **Modernizing Rules and Practices:** The proposal seeks to amend existing regulations (EU) No 1308/2013, (EU) 2021/2115, and (EU) No 251/2014 to:

    o Improve the **scheme of authorisations for vine plantings**.

    o Facilitate the production of wine products with **lower alcohol content**, responding to consumer trends.

    o Allow **new ways to inform consumers**, notably through **harmonized electronic labelling**, to reduce administrative burdens and simplify trade.

    o Support **producer groups** in developing **wine tourism**.

    o Strengthen **cooperation** and support investments in **climate change mitigation and adaptation**.

- **Consistency with EU Policies:** The measures are designed to be consistent with existing **agricultural policies** and broader **EU goals**, such as promoting **employment and growth in rural areas** and enabling consumers to make **informed choices**.

- **Urgency and Sector-Specific Solutions:** The Commission underscores the **urgency** of these measures to prevent further deterioration of the sector and **irreversible consequences for rural areas**.

DigitalTrade4.EU understands these objectives as a clear call for **innovative, sustainable, and efficient solutions**, many of which can be significantly advanced through **digital transformation**.

Approach and Recommendations

DigitalTrade4.EU advocates for a **comprehensive green-digital trade strategy** that can directly support and enhance the Commission's objectives for the wine sector. Our approach is centred on creating a **harmonized, interoperable, and sustainable trade ecosystem**.

Leveraging Digitalisation for Competitiveness and Market Access

The Commission's goal to enhance **competitiveness** and explore **new market opportunities** for the wine sector can be substantially supported by **digital tools**.

1. **Digital Product Passports (DPPs):** We strongly recommend the adoption of **DPPs for wine products**. DPPs can provide verifiable information on:

   o **Origin and Authenticity:** Combating **fraud** and ensuring **product integrity**.

   o **Sustainability Practices:** Detailing **eco-friendly viticulture**, **water management**, **carbon footprint**, and **biodiversity efforts**. This aligns with growing **consumer demand for sustainable products**.

   o **Product Characteristics:** Including information mandated by the new regulations (e.g., **ingredients, nutritional information, de-alcoholisation process**) in a **standardized digital format**. This directly supports the Commission's aim to "allow for new ways to inform consumers" and can be integrated with the proposed **electronic labelling**. **UNECE Recommendation No. 49 ("Transparency at Scale")[2]** provides a global protocol for sharing supply-chain ESG data, reinforcing this vision.

2. **Enhanced E-labelling and Consumer Information:** The Commission's plan to **harmonize electronic labelling** is crucial. **DigitalTrade4.EU** supports empowering the Commission to develop **language-free systems** (e.g., pictograms, QR codes linked to

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[2] 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

DPPs) to minimize costs and administrative burdens, especially for **SMEs**, while ensuring broad **consumer accessibility**.

3. **Facilitating Trade through Digital Standards:** Adopting **global digital trade standards** like the **UNCITRAL Model Law on Electronic Transferable Records (MLETR)[3]** and ensuring **interoperability** with frameworks like **eIDAS 2.0** can streamline export processes for wine producers, reduce paperwork, and lower transaction costs.

Supporting Sustainability and Climate Adaptation

The wine sector's **vulnerability to climate change** and the push for **sustainable practices** are key concerns for the Commission. **DigitalTrade4.EU's green trade initiatives** offer solutions:

- **Traceability for Sustainable Supply Chains:** **DPPs** and **blockchain-based traceability tools** can help monitor and verify **sustainable practices** throughout the wine supply chain, from vineyard to consumer. This data can support claims related to **organic, biodynamic, or low-intervention wines**.

- **Carbon Accounting and CBAM Alignment:** As the EU implements the **Carbon Border Adjustment Mechanism (CBAM)**, digital tools will be essential for wine exporters to track and report **embedded emissions** (e.g., through the CBAM, which requires importers to account for carbon emissions in production processes). **DPPs** can integrate this data, facilitating compliance and potentially enabling access to **green finance** or **preferential market access**.

- **Data-Driven Climate Adaptation:** Digital technologies can support **precision viticulture**, better **water resource management**, and **early warning systems** for climate-related risks, thereby enhancing the **resilience of vineyards**.

Strengthening Rural Development and Wine Tourism

The Commission's support for **wine tourism** aligns with the potential of **digital platforms**:

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[3] UNCITRAL. Model Law on Electronic Transferable Records (2017)
https://uncitral.un.org/en/texts/ecommerce/modellaw/electronic_transferable_records

- **Digital Platforms for Wine Tourism:** Developing **integrated digital platforms** can promote wine regions, connect tourists with producers, and facilitate bookings and experiences. This can create **new revenue streams** and support **rural employment**.

Key Strategic Recommendations for the Commission

Building on our broader input, **DigitalTrade4.EU** proposes the following **actionable steps** that are highly relevant to the wine sector and the Commission's objectives:

1. **Prioritize Digital Standards and Interoperability:** Champion the adoption of **MLETR** and **eIDAS 2.0** to create a **seamless digital trading environment**. For the wine sector, this means easier export documentation and compliance.

2. **Integrate Trade Finance with ESG Data:** Facilitate access to **green finance** for wine producers who can demonstrate sustainable practices through **verifiable digital means** (e.g., DPPs). This can incentivize the transition towards **more sustainable viticulture**.

3. **Embed Sustainability in Trade Policy:** Actively promote the use of **DPPs** and **digital traceability for wine**, aligning with **UNECE's "Transparency at Scale"** and reinforcing **CBAM objectives**.

4. **Foster EU-Asia Digital Trade Partnerships:** Leverage agreements like the **EU-Singapore Digital Trade Agreement (DTA)** to promote EU standards for **digital trade and sustainability**, opening new markets for EU wines with **verifiable green credentials**.

5. **Support SME Digitalisation:** Dedicate resources (e.g., via **COSME, Digital Europe Programme**) to help **SME wine producers** adopt digital tools, comply with DPP requirements, and access e-commerce platforms.

6. **Fund Digital Infrastructure and Pilot Projects:** Allocate **MFF funds** to co-finance projects that pilot **DPPs in the wine sector**, develop **interoperable e-labelling solutions**, and build **digital platforms for wine tourism**.

Bridging Agriculture and Wine: From Farm to Final Product

Connecting the **agricultural origins** of **wine** with the **final** product through **robust digital mechanisms** is **paramount** for achieving the **transparency**, **sustainability**, and **efficiency goals** outlined for the sector. Drawing **inspiration** from the **advancements** in **digitalising agricultural policy** and **trade**, the **wine sector** can significantly **benefit** from a "**farm-to-glass**" **digital thread**.

Leveraging Digitalisation for Farm-to-Glass Transparency

The **journey** towards **enhanced transparency** begins at the **vineyard**. Building on the **principles** of **CAP simplification** and **digitalisation**, where systems like the **Land Parcel Identification System (LPIS)**, a geospatial database for agricultural land; the **Geo-Spatial Application (GSA)**, which supports satellite-based monitoring; and the **Area Monitoring System (AMS)**, designed for crop-specific data collection, are being streamlined, the **wine sector** can adopt **similar data-centric approaches**.

- **Digital Product Passports (DPPs) as the Cornerstone:** **DPPs** for **wine** should integrate **farm-level data** from **CAP digital tools** (e.g., **LPIS** for **land mapping**, **AMS** for **crop monitoring**) to create a unified **'farm-to-glass' digital thread**. This enables:

  - **Automated data ingestion:** Vineyard inputs (water, pesticides) recorded in CAP systems directly populate DPP fields.

  - **Real-time compliance checks:** Geo-tagged harvest data validates appellation claims against LPIS boundaries.

  DPPs, as advocated earlier, become even more **powerful** when **enriched** with **verifiable farm-level data**. For **wine**, these **farmer-specific features** within a **DPP** should include:

  - **Geographical Origin:** **Precise farm/vineyard location** or **region** to **validate product provenance** and **appellation claims**.

- **Farm/Producer Identification:** A **unique identifier** for the **winegrower** or **estate**, ensuring **accountability** and **traceability back to the source**.

- **Production Cycle Data: Key dates** such as **planting**, **harvest**, and **vinification timestamps** for **specific batches**, enabling **precise tracking**.

- **Viticultural Practices: Documented** farming methods (e.g., **organic**, **biodynamic**, **integrated pest management**, **conventional**), including **details** on **soil management** and **canopy management**.

- **Input Usage Records: Detailed** and **verifiable records** of **inputs** such as **fertilizers**, **plant** protection products (**pesticides**, **herbicides**, **fungicides**), and **water consumption** at the **vineyard level**. This **data** is **crucial** for **sustainability assessments** and **consumer information**.

- **Biodiversity Measures: Information** on **efforts** to **enhance biodiversity** within and around the **vineyard**.

- **Batch or Lot Numbers: Unique identifiers** for **specific batches** of **grapes** or **wine**, enabling **targeted recall** or **quality control** linked directly to **vineyard operations** and **vinification processes**.

- **Interoperability for Seamless Data Flow:** To ensure this **farm-level data** seamlessly **integrates** into the broader **supply chain** and is **accessible** to **consumers** and **authorities**, **interoperability** is **key. Adherence** to **standards** like **eIDAS** 2.0 for **secure electronic identification** and **trust services**, and the **principles** of the **MLETR** for **digital trade documents**, will **facilitate** the **efficient** and **legally recognized cross-border digital transfer** of **wine-related information**.

Integrating Comprehensive Sustainability Data (ESE)

Beyond **basic traceability**, the **demand** for **comprehensive sustainability information** is **growing. Digital** Product Passports for **wine** should be **designed** to carry **holistic Environmental, Social, and Economic (ESE) data**, providing a **full picture** of the product's **impact**.

- **Key ESE Metrics for Wine:**

- Carbon Footprint: **CO₂ emissions** and other **greenhouse gas (GHG) emissions** **calculated** across the **lifecycle**, from **grape growing** to **bottling** and **distribution**.

- Water Usage: **Detailed water consumption data**, including **source** and **water stress indicators** for the **production region**.

- Energy Consumption: **Breakdown of energy used**, differentiating between **renewable** and **non-renewable sources** in **viticulture** and **winemaking**.

- Land Use and Biodiversity: **Impact** on **land use**, **soil health**, and **local biodiversity**, including **efforts** towards **conservation**.

- Waste Management: **Data** on **waste generation** (e.g., **pomace**, **packaging**) and **recycling/upcycling rates**, reflecting **circular economy practices**.

- **Alignment with Consumer Expectations and Regulatory Frameworks:** **Integrating** such **granular ESE data** into **DPPs** directly **addresses consumer demand** for **transparency** and **supports compliance** with **evolving EU regulations** like the **Carbon Border Adjustment Mechanism (CBAM)** and **Corporate Sustainability Reporting Directive (CSRD)**. This **allows** for **verifiable green claims** and can **differentiate EU wines** in the **global market**.

Empowering Wine Producers, Especially SMEs

The **adoption** of these **digital tools** and **data management practices requires support**, particularly for **Small and Medium-sized Enterprises (SMEs)** which form the **backbone** of the **EU** wine **sector**.

- **Capacity Building and Support:** **Robust training programs**, **advisory services**, and **digital capacity-building initiatives** are **essential**. This includes **improving digital literacy**, **providing access** to **affordable digital tools** and **infrastructure** in **rural areas**, and **guidance** on **data collection** and **management**.

- **Leveraging Existing and Proposed Initiatives:** **Initiatives** like the **proposed "Green-Digital Trade Academy"** and **existing CAP-funded advisory services** (Article 78 of

Regulation (EU) 2021/2115) can be **tailored** or **expanded** to **specifically address** the **needs** of **winegrowers** in their **digital transition**.

Policy Coherence for a Resilient Wine Value Chain

A **holistic approach** requires **strong policy coherence** between **wine sector regulations**, the **Common Agricultural Policy (CAP)**, and **broader EU digital trade** and **environmental strategies**.

- **Integrated Policy Framework: Ensuring** that **digital solutions implemented** in the **wine sector** are **compatible** with and **complementary** to those in **agriculture** and **trade** will **prevent duplication of effort** and **create synergies**. For instance, DPPs should align with the **European Green Deal's circular economy objectives** by tracking recyclable packaging via batch numbers. Simultaneously, **farm-level carbon data** (collected under CAP's eco-schemes) must feed into CBAM reporting streams to avoid duplicate audits for winemakers.

- **Enhancing Resilience:** This **integrated digital framework**, from **farm to consumer**, **enhances** the **resilience** of the **wine supply chain**. **Real-time data** can **improve crisis management** (e.g., in response to **climate events** or **market disruptions**), **facilitate quicker responses**, and **support more targeted aid** or **intervention** where **necessary**.

By **bridging the gap** between **agriculture** and the **final wine product** through **comprehensive digitalisation**, the **EU** can **foster** a **wine sector** that is not only **more competitive** and **efficient** but also **demonstrably sustainable** and **transparent**, **meeting the expectations** of **modern consumers** and **global markets**.

Conclusion and Next Steps

DigitalTrade4.EU firmly believes that the **strategic integration of digital technologies and sustainability principles** offers a **transformative pathway** for the EU wine sector. The Commission's proposal (**COM(2025) 137 final**) lays a strong foundation by identifying the core challenges and objectives. Our recommendations aim to build upon this by showcasing how a **green-digital trade framework** can provide **practical, effective, and innovative solutions**.

The wine sector, with its **rich heritage** and significant **economic and cultural importance**, stands to gain immensely from enhanced **transparency, efficiency, and sustainability**. Tools like **Digital Product Passports, harmonized e-labelling, and streamlined digital trade processes** can reduce burdens on producers, meet evolving consumer expectations, and strengthen the EU's position as a **global leader in quality and sustainable wine production**.

DigitalTrade4.EU is committed to supporting the European Commission in these endeavors. We offer our **expertise and extensive network** to collaborate on **pilot projects**, contribute to the **development of standards**, and facilitate **dialogue between policymakers and industry stakeholders**, including partnerships with regional agricultural authorities and wine cooperatives to ensure grassroots input.

We recommend the following **next steps**:

- **Establish a Joint Taskforce:** Create a taskforce involving the Commission (**DG AGRI, DG TRADE, DG CNECT**), Member States, and industry representatives to explore the implementation of **DPPs and advanced e-labelling for the wine sector**.

- **Launch Pilot Programs:** Initiate **pilot programs** focused on **wine DPPs**, integrating **sustainability data and traceability**, and testing **interoperability across EU and international markets**.

- **Dedicated Funding Allocation:** Ensure that the upcoming **Multiannual Financial Framework (MFF)** includes specific allocations for the **digitalisation and green transition of agricultural sectors**, including wine, with a focus on **SME support**.

To **operationalise** the **strategic alignment** of **digital** and **green transitions**, **DigitalTrade4.EU** proposes the following **Green-Digital Trade Leadership Roadmap** (table 1, on page 16), outlining **key activities**, **objectives**, **metrics**, and **tools**.

We are confident that by working together, we can ensure a **vibrant, competitive, and sustainable future** for the European wine sector, underpinned by the **transformative power of digital innovation**.

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.