Electronic Freight Transport Information (eFTI) platforms

ECTRI REPLY TO THE EC PUBLIC CONSULTATION

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ECTRI, the European Conference of Transport Research Institutes, welcomes the proposed Implementing Regulation laying down the functional requirements for electronic freight transport information (eFTI) as an important step towards the digitalisation of administrative processes in European freight transport. The regulation makes an important contribution to modernising interoperability between the parties involved and the exchange of data between business and administration. From the perspective of applied research and with a view to the diversity of stakeholders in the logistics system, ECTRI would like to address key aspects of the regulation and make corresponding recommendations below.

A) Ensuring digital maturity and feasibility

There are significant differences in digital maturity, resources and technical expertise between the various players in European freight transport - especially between large companies, small and medium-sized enterprises (SMEs), and public administrations. For the eFTI Regulation to be implemented across the board, the functional requirements for eFTI platforms must be designed in such a way that they remain accessible and realisable for SMEs and administrations with limited IT resources. **We therefore support the approach of modular platform architecture and simple, standardised Application Programming Interfaces (APIs) that enable integration into existing Enterprise Resource Planning (ERP) or transport management systems (TMS).** In addition, we propose setting up accompanying training and support programmes, in particular EU-funded services, to help companies and authorities get started with eFTI.

B) Data security and commercial relevance of eFTI data

We expressly welcome the recognition of the strategic importance and commercial value of the data stored on eFTI platforms. The requirements for **data security, integrity and availability are crucial for business confidence in digital platform solutions**. The focus on international standards such as ISO 27001, ISO 27017 and ISO 27701 should be emphasised positively. The emphasis on constant availability and data integrity addresses key requirements in logistics operations. However, we note that the above certifications are not currently mandatory. Furthermore, there are no specific regulations for data storage in cloud infrastructures, particularly with regard to data localisation, key management and technical recovery procedures. The term "permanent accessibility" is also technically and legally unspecific. **We therefore highly recommend the introduction of mandatory certification for productive eFTI platforms from the beginning, the definition of binding minimum technical standards (encryption, backup, replication, emergency plans), regular security audits by independent auditors (e.g., penetration tests) and the clarification that these requirements also apply to subcontractors and cloud providers**.

C) Reuse of B2B data and demarcation from official data use

The Regulation provides that companies can reuse existing electronic information from internal systems like ERP, TMS, and Electronic Consignment Note (eCMR) to fulfil regulatory requirements via eFTI. This provision is to be welcomed, as it avoids redundancies and reduces implementation costs. It is also positive that the regulation intentionally excludes B2B data exchange so as not to unnecessarily regulate business processes. Many data elements (e.g. weights, addresses, dangerous goods information) are used in both B2B and

B2A contexts. Without harmonised mapping standards, there is a risk of inconsistencies or error-prone duplicate structures. **We therefore recommend the development of a standardised mapping between common B2B documents** (e.g. eCMR, International Federation of Transport Workers in the Mining Industry, transport order) **and the eFTI data model**. A defined "minimum compliance subset" for purely official purposes reduces the technical complexity.

D) Commitment instead of voluntariness: eFTI as a basic digital infrastructure

The current voluntary use of the eFTI Regulation by companies is preventing comprehensive digitalisation in freight transport. **In the medium term, only a binding application obligation for all stakeholders involved - with staggered transitional arrangements - can ensure the necessary scaling, interoperability and data availability.**

E) Data utilisation - use of eFTI data for research, statistics and innovation

The consistent collection and standardisation of transport data through eFTI offers considerable added value that goes far beyond the purely official purpose of use. This potential must be actively recognised and explicitly enabled in the regulation. For example, **linking eFTI data to existing statistical surveys** - such as the European Road Freight Transport Survey (ERFT) - can significantly reduce the data collection effort (for companies) and improve data quality at the same time. In addition, eFTI data is a central basis for evidence-based transport policy, climate-friendly logistics solutions and innovative cooperation models such as horizontal bundling or optimisation of freight capacity utilisation. Controlled **access to this data for scientific institutions** should therefore be explicitly provided for - in strict compliance with data protection regulations and through suitable anonymisation or pseudonymisation procedures. Finally**, eFTI data also offers considerable added value in the B2B sector**: uniformly structured information can be used for internal company processes and inter-company applications such as tracking & tracing, precise Estimated Time of Arrival (ETA) forecasts or multimodal shipment tracking - provided that a clear legal framework and standardised technical interfaces are in place.

F) Technical interoperability and further development

The regulation aims to give the platforms sufficient leeway without jeopardising interoperability between the systems. The planned involvement of expert groups (e.g. within the Digital Transport and Logistics Forum or the working groups of the Member States) in the development of technical guidelines is a sensible approach to ensure practical relevance. However, it remains unclear how these documents are maintained and updated. There is a lack of a binding governance structure, a clear update cycle and a commitment to backwards compatibility. **We propose the establishment of a permanent technical advisory board to maintain and further develop the guidelines and the introduction of a "change notification policy" for platform operators to inform users of changes in good time.**

All in all, the eFTI Implementing Regulation forms an important basis for the digital transformation of logistics management in Europe. From ECTRI point of view, it strikes a good balance between legal requirements, technological openness and user-orientation.