



D3.1 - Report on blockchain's inclusion to the Rolling Plan

April 2024

Deliverable information	
Project Acronym	BlockStand
Project Name	Empowering European Experts' leadership in Blockchain Standardisation
Grant Agreement number	101102757
Document full Number	BlockStand_D3.1_Report_on_Blockchain_inclusion_to_the_Rolling_Plan_(1)_UNINFO_v.0.2_20240502_[DSME].pdf
Deliverable Title	D3.1_Report on Blockchain inclusion to the Rolling Plan
Author(s)	UNINFO
Contributor(s) if any	DIGITAL SME
Dissemination level	Public

Version	Date	Author	Description
v1	30 April 2024	Andrea Caccia (UNINFO)	First version
v2	2 May 2024	Justina Bieliauskaite, Serena Dell'Agli (DSME)	Internal quality review and comments

D3.1 - Report on blockchain's inclusion to the Rolling Plan 1

April 2024..... 1

- 1. Introduction5
- 2. The Rolling Plan for ICT Standardisation6
 - 2.1 The Role of the Rolling Plan in Supporting EU Policies6
 - 2.2 The Standardization Landscape for Blockchain6
 - 2.3 BlockStand's Role in the Standardization Landscape.....7
- 3. Goals of BlockStand contribution to the Rolling Plan (RP).....8
 - 3.1 Ensure that the RP blockchain topics are actionable.....8
 - 3.2 Ensure that the priorities are clear8
 - 3.3 Ensure policy alignment and technical neutrality with EMB involvement8
- 4. The Rolling Plan Drafting Cycle and BlockStand's Engagement 10
 - 4.1 The Rolling Plan yearly update cycle 10
 - 4.2 need to synchronise with BlockStand deliverables 11
- 5. BlockStand contribution to Rolling Plan 12
 - 5.1 Working method 12
 - 5.2 The 2024 contribution 13
 - 5.2.1 RP 2024 chapter 3.3.6 Blockchain & DLT..... 13
 - 5.2.2 RP 2024 chapter 3.0.1 Data Economy 16
 - 5.2.3 RP 2024 chapter 3.1.3 Data interoperability..... 17
 - 5.2.4 RP 2024 chapter 3.3.2 e-Invoicing 18
 - 5.2.5 RP 2024 chapter 3.3.5 Fintech and Regtech Standardisation 19
 - 5.2.6 RP 2024 chapter 3.4.13 Circular economy.....20

5.3 Recommendations for the 2025 version of the Rolling Plan	22
5.4 The 2025 contribution	23
5.5 Recommendations for the 2026 version of the Rolling Plan	23
6. Conclusions and Next Steps.....	24
7. DISCLAIMER.....	25

1. Introduction

BlockStand project aims to support and increase the participation of European experts in blockchain and DLT standardisation activities, with a view to international leadership, while embodying European values and digital sovereignty.

By establishing the Blockchain Standardisation Facility, the project is creating an online blockchain community composed of all stakeholders, including SMEs, EBSI and R&I communities.

The community engages in continuous collaboration and exchange of ideas to identify areas where supported expert contributions is feeding the following three objectives:

- Implementing the Rolling Plan chapter on blockchain and contributing to future editions
- Strengthening the links with EBSI and the European Blockchain Partnership (EBP)
- Supporting the participation of European experts and increasing the involvement of European experts in international standardisation organisations.

The Community works in a circular way, in which each of the objectives mentioned above feeds into the other two objectives, and vice versa.

This deliverable, D3.1, covers BlockStand's initial contribution to the EU's Rolling Plan for ICT Standardisation 2024 edition. As the first of two annual deliverables, it establishes the foundation for the project's ongoing engagement with the Rolling Plan process. Future versions will provide more detailed input and recommendations for the 2025 and 2026 editions, informed by the project's continuous monitoring of the blockchain standardization landscape and the work of the funded experts.

By proactively contributing to the Rolling Plan, BlockStand aims to ensure that the EU's strategic priorities for blockchain standardization reflect the latest technological developments, market needs, and European values. The project's input will help shape the direction of blockchain standardization efforts to support Europe's competitiveness and sovereignty in this critical domain. D.3 will be further updated at M24.

2. The Rolling Plan for ICT Standardisation

This chapter aims to set the stage for understanding the significance of BlockStand's contributions to the Rolling Plan for ICT Standardization¹.

2.1 The Role of the Rolling Plan in Supporting EU Policies

The Rolling Plan for ICT Standardisation is a key instrument for guiding the development and adoption of standards that support EU policies and strategic objectives. It serves several critical functions:

- a) Identifying areas where ICT standardization is needed to enable the implementation of EU policies and strategies, such as the Digital Single Market, the European Green Deal, including a specific chapter for the Blockchain standardisation strategy.
- b) Providing a common reference point for stakeholders involved in ICT standardization, including the European Commission, European Standardization Organizations (ESOs), National Standardization Bodies (NSBs), industry consortia, and research institutions.
- c) Facilitating coordination and collaboration among these stakeholders, ensuring that standardization efforts are aligned, efficient, and effective in supporting policy goals.
- d) Providing transparency and accountability for ICT standardization activities, allowing stakeholders to track progress, identify gaps, and propose new actions as needed.

2.2 The Standardization Landscape for Blockchain

Blockchain technology presents unique challenges and opportunities for standardization, given its decentralized nature, rapid evolution, and wide-ranging applications. The standardization landscape for blockchain is complex and multi-layered, involving a variety of actors and initiatives:

- a) International Standardization Organizations (ISOs): ISO Technical Committee 307 (ISO/TC 307) is dedicated to developing standards for blockchain and distributed ledger technologies. It covers a wide range of topics, including terminology, reference architecture, security, privacy, governance, and interoperability.
- b) European Standardization Organizations (ESOs): CEN-CENELEC Joint Technical Committee 19 (CEN-CLC/JTC 19) focuses on developing European standards for blockchain and distributed ledger technologies. It works closely with ISO/TC 307 to ensure alignment and avoid duplication of efforts.
- c) Industry Consortia and Alliances: Various industry-led initiatives, such as the International Association for Trusted Blockchain Applications (INATBA), member of the BlockStand consortium, are working to develop sector-specific standards and best practices for blockchain implementation.
- d) Open Source Communities: Open source projects, such as Hyperledger and Ethereum, play a crucial role in driving innovation and shaping the development of blockchain technologies. These communities often collaborate with standardization bodies to ensure interoperability and promote the adoption of their protocols and tools.

¹ Version 2024 is available here: <https://joinup.ec.europa.eu/collection/rolling-plan-ict-standardisation/rolling-plan-2024>

2.3 BlockStand's Role in the Standardization Landscape

Within this complex landscape, BlockStand aims to play a key role in driving European leadership and participation in blockchain standardization efforts. The project's main objectives include:

- a) Supporting the participation of European experts in standardization activities at the European and international levels, ensuring that European interests and values are well-represented.
- b) Identifying gaps and priorities for blockchain standardization, taking into account EU policies, market needs, and technological developments.
- c) Contributing to the development and implementation of the Rolling Plan for ICT Standardisation, providing expert input and recommendations to ensure that blockchain standardization activities are aligned with EU strategic objectives.
- d) Fostering collaboration and coordination among European stakeholders involved in blockchain standardization, including industry, academia, and public sector actors.

3. Goals of BlockStand contribution to the Rolling Plan (RP)

3.1 Ensure that the RP blockchain topics are actionable

One of the primary objectives of BlockStand's engagement with the Rolling Plan is to ensure that the blockchain-related topics and actions outlined in the document are concrete, practical, and implementable. To achieve this, the project is aiming to:

- a) Provide specific recommendations for each relevant action, to ensure they detail the steps required to progress the work and the expected outcomes.
- b) Identify coherence and potential dependencies with policies and between actions, highlighting where coordination between different stakeholders or initiatives is necessary.
- c) Contribute to and monitor the progress of blockchain standardization activities with the activities of the funded experts and provide contributions to the Rolling Plan.

3.2 Ensure that the priorities are clear

The Rolling Plan serves as a key reference point for the EU's strategic priorities related to blockchain standardization. As such, it is crucial that these priorities are communicated clearly and consistently. BlockStand is contributing to this by:

- a) Analyzing the current framing of blockchain priorities in the Rolling Plan and proposing adjustments where greater clarity or specificity is needed. This may involve refining the language used, providing additional context, or breaking down complex priorities into more manageable sub-components.
- b) Identifying areas where the Rolling Plan's coverage of blockchain standardization may be incomplete, imbalanced or misaligned with policy, and proposing new or revised priorities or actions to address them.

3.3 Ensure policy alignment and technical neutrality with EMB and TCB involvement

BlockStand recognizes the importance of maintaining alignment between the Rolling Plan's coverage of blockchain standardization and broader EU policy objectives. At the same time, the project is committed to promoting a technology-neutral approach that encourages innovation and avoids favoring specific implementations. To balance these objectives, BlockStand is:

- a) Working closely with the Executive Management Board (EMB) of the project to review and validate all contributions to the Rolling Plan. The EMB's expertise in blockchain technology, standardization processes, and EU policy is instrumental in ensuring that BlockStand's inputs are technically sound, strategically relevant, and aligned with overarching goals.
- b) Conducting thorough analyses of relevant EU policies and initiatives, such as the European Blockchain Strategy, the Digital Single Market Strategy, and the General Data Protection Regulation (GDPR), to identify synergies and potential conflicts with proposed blockchain

standardization activities. BlockStand is set to propose approaches for navigating these interactions and ensuring policy coherence.

- c) Promoting the adoption of technology-neutral standards that focus on desired outcomes and functionality, rather than prescribing specific technical solutions. BlockStand, consulting its supported standardisation experts within the Technical Coordination Board, has been working to ensure that the Rolling Plan's coverage of blockchain standardization is inclusive and flexible, allowing room for innovation and experimentation within a common framework.

4. The Rolling Plan Drafting Cycle and BlockStand's Engagement

4.1 The Rolling Plan yearly update cycle

The Rolling Plan for ICT Standardisation is updated annually through a collaborative process involving the European Commission, the Multi-Stakeholder Platform on ICT Standardisation (MSP), and more specifically its subgroup dedicated to draft the RP, the Task Force Rolling Plan (TFRP). The update cycle typically follows this timeline:

1. May – June
 - a. The European Commission requests input internally from the policy officers responsible of each area covered on updates to the Rolling Plan.
 - b. The Commission prepares a first draft update by the end of June.
2. June – Mid July
 - a. The draft update is consolidated on the Commission's collaborative platform (Wiki) and made available.
 - b. The MSP consultation on the draft update is launched
3. Mid July – Mid September
 - a. The MSP conducts its consultation on the draft update, providing comments and suggestions.
 - b. The MSP's input is collected and made available for further consideration by the TFRP.
4. Mid September – Mid October
 - a. The TFRP consolidates the MSP's input and prepares a pre-final draft of the updated Rolling Plan.
 - b. The pre-final draft is circulated to the MSP for clarifications.
5. Mid October – Mid November
 - a. The MSP is consulted to gather clarifications and comments on any new chapters or substantial changes.
 - b. The MSP's additional input is collected and made available.
6. Mid November – Mid December
 - a. The TFRP incorporates the final round of feedback and prepares the final draft of the updated Rolling Plan
7. Mid December – Mid January
 - a. The final draft is submitted to the MSP for approval through a written procedure (decision by correspondence).
 - b. The MSP provides its final endorsement of the updated Rolling Plan.
8. Mid January – Mid February
 - a. The Commission prepares the Rolling Plan for publication.
 - b. The updated Rolling Plan is published and disseminated to all the stakeholders.

4.2 Need to synchronise with BlockStand deliverables

BlockStand's activities and deliverables are designed to align with and support the Rolling Plan drafting cycle. The project's engagement is structured as explained in the following sections.

Year 1 (May 2023 - April 2024):

- BlockStand has contributed to the development of the Rolling Plan 2024 directly with the internal expertise providing input and recommendations based on the project's initial findings (as detailed in Section 3.2) but without input from the work of its funded experts as this did not fit with the timeline for comments for the RP.
- The project participates in the MSP consultation process, offering comments and suggestions to refine the draft update.
- The project prepares detailed recommendations for the Rolling Plan 2025 update based on its ongoing work and the deliverables produced by its funded experts.
- BlockStand submits its first annual report on blockchain standardization (D3.1) to the Commission, informing the final stages of the Rolling Plan 2024 update.
- BlockStand's supported experts, however, have contributed to the implementation of the Rolling Plan 2023 by aligning their applications and work with the RP objectives, which is explained and demonstrated in their applications and Final Contribution Reports. More information about experts' work and alignment with the EU priorities, including their contributions to the Rolling Plan's priorities can be found in D4.2 and D4.4.

Year 2 (May 2024 - April 2025):

- BlockStand continues to monitor the implementation of the Rolling Plan 2025 and engages with its funded experts and relevant stakeholders to gather feedback and assess progress.
- BlockStand participates in the Rolling Plan 2025 drafting cycle, contributing to the MSP consultation and providing expert input to shape the final update.
- The project prepares detailed recommendations for the Rolling Plan 2026 update based on its ongoing work and the deliverables produced by its funded experts.
- The project submits its last report on blockchain standardization (D3.2) to the Commission, supporting the finalization of the Rolling Plan 2025.
- BlockStand's supported experts continue aligning their work and putting focus of their activities on the priorities outlined in the outgoing Rolling Plan 2024 (as mentioned above, such practical contributions to the implementation of the Rolling Plan will be explained in more depth within the upcoming D4.3 and D4.5).

By aligning its activities with the Rolling Plan drafting cycle, BlockStand ensures that its contributions are timely, relevant, and impactful. This strategic approach maximizes the support to the achievement of EU policy objectives.

5. BlockStand contribution to Rolling Plan

5.1 Working method

This paragraph outlines the working method for BlockStand's contributions to the Rolling Plan. In summary, BlockStand's working method for contributing to the Rolling Plan involves a combination of targeted comments on the current version of the document (as outlined in 5.1.1 and 5.1.3) and input to support the early stages of the annual update process (as outlined in 5.1.3 and 5.1.4), with active participation in the commenting stage, and forward-looking recommendations to contribute the development of future editions.

5.1.1 Comments to the Rolling Plan 2024

BlockStand's first step has been to review and provide comments on the 2024 edition of the Rolling Plan (now published). This process involved:

- Conducting a thorough analysis of the blockchain-related topics and actions in the Rolling Plan 2024, assessing their relevance, clarity, and alignment with the current state of blockchain standardization.
- Identifying potential gaps, inconsistencies, or areas for improvement in the Rolling Plan's coverage of blockchain standardization issues.
- Developing concrete suggestions for enhancing the specificity, measurability, and actionability of the blockchain-related actions in the Rolling Plan.
- Submitting these comments and suggestions to the European Commission leveraging on the participation in the TFRP of some BlockStand experts.

With those targeted comments, in line with the goals outlined in chapter 3, BlockStand aimed to contribute to the refinement and optimization of the treatment of blockchain standardization issues in the Rolling Plan 2024.

5.1.2 input to support the first stage of the Rolling Plan 2025 update cycle

Following the timeline outlined in Section 4.1, this document (D3.1) is the first version of the report on blockchain inclusion to the RP and is timed to support the first stage of the Rolling Plan 2025 update cycle, which involves the Commission providing updates and improvements to the RP.

As a first version of the report, it aims to provide the following inputs at an early stage in the Rolling Plan 2025 update cycle:

- Synthesize the findings and recommendations from the project's first year of activities from the work of the funded experts.
- Propose priorities and actions for blockchain standardization to be considered for inclusion in the Rolling Plan 2025, based on an assessment of experts' deliverables.

5.1.3 Providing feedback during the commenting stage of the Rolling Plan 2025

As outlined in Section 4.1, the Rolling Plan update process includes a commenting stage where stakeholders are invited to provide feedback on the draft version of the document. BlockStand will actively participate in this commenting stage for the Rolling Plan 2025, in a similar way as outlined in 5.1.1 for the RP 2024. This activity will be reported in April 2025 in D3.2.

5.1.3 Providing input to support the development of the Rolling Plan 2026

The second version of this report (D3.2), to be submitted at M24 (April 2025), will aim to provide input to support the development of the Rolling Plan 2026. This activity will be conducted as outlined in 5.1.2 for the RP 2024. In addition, project coordinator, DIGITAL SME, remains committed to follow the entire Rolling Plan 2026 development process, even after the lifetime of BlockStand project, and ensure that the early recommendations, as will be reported in the D3.2, would be considered during TFRP meetings, and, if agreed upon, included to the Rolling Plan 2026.

5.2 The 2024 contribution

The contribution for the Rolling Plan 2024 has been discussed internally because the first deliverables from the founded experts could not fit in the Rolling Plan development cycle and then discussed in specific EMB meetings.

Contributions to the Rolling Plan chapters are described in the following paragraphs.

5.2.1 RP 2024 chapter 3.3.6 Blockchain & DLT

5.2.1.1 Proposed comment

Legislative procedures for DORA and MiCA EU Regulations are completed, it is suggested to update accordingly the references to both DORA and MiCA 2020 Proposals, substituting them for the reference to the definitive 2022 DORA and 2023 MiCA EU Regulations

5.2.1.2 Proposed change

Section A.1

Replace the text:

On 24 September 2020, the European Commission presented a proposal for the Regulation of Markets in Crypto-assets (MiCA) as a part of its “Digital Finance package”, which will provide a legal framework for issuers of crypto-assets that are currently not regulated by EU financial services legislation and providers of related services. At the same time, it proposed a Regulation on a pilot regime for market infrastructures based on distributed ledger technology, which was published in June 2022.

With the text:

On 24 September 2020, the European Commission presented a proposal for the Regulation of Markets in Crypto-assets (MiCA) as a part of its “Digital Finance Package”, preparing a legal framework for issuers of crypto-assets that will not be regulated by EU financial services legislation (MiFiD 2, Directive (EU) 2014/65) and providers of related services. After profound changes, MiCA was published as Regulation (EU) 2023/1114 that applies to token issuing and trading in non-MiFiD DLT-based markets. At the same time, the 2020 Package proposed a Regulation on a pilot regime for market infrastructures based on distributed ledger technology that was published as Regulation (EU) 2022/858 and Regulation (EU) 2022/2554 on digital operational resilience for the financial sector (Digital Operational Resilience Act, or DORA, that shall apply from 17 January 2025) were published in June 2022.

Update Section A.3

- Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector (DORA Regulation), <http://data.europa.eu/eli/reg/2022/2554/oj>
- Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, <http://data.europa.eu/eli/reg/2023/1114/oj>
- Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector, <http://data.europa.eu/eli/reg/2022/1925/oj>

Update Action 8, section B:

Action 8: ESOs to develop the standards needed for the introduction of [Digital Euro \(CBDC\)](#) and token economy (~~upcoming~~ MiCA Regulation), in particular to ensure interoperability with smart-contracts, legacy systems, etc. ~~including standards towards assessing CO2 footprint of different blockchains/DLTs~~ ~~The revised legislative proposal of MiCA regulation introduces links with the EU Sustainable Finance taxonomy, thus activities towards assessing CO2 footprint of different blockchains/DLTs are very welcome.~~ **including standards towards assessing CO2 footprint of different blockchains/DLTs**

5.2.1.3 Task Force Rolling Plan resolution

On A.1

EC to check

(e.g. see wording like "After profound changes..")

On A.3: Accepted and ready to implement

On B.1 Action 8

Accepted and ready to implement in the way provided below

Action 8: ESOs to develop the standards needed for the introduction of [Digital Euro \(CBDC\)](#) and token economy (~~upcoming~~ MiCA Regulation), in particular to ensure interoperability with smart-contracts, legacy systems, etc. ~~including standards for assessing CO2 footprint of different blockchains/DLTs and~~ ~~The revised legislative proposal of MiCA regulation introduces links with the EU Sustainable Finance taxonomy, thus activities towards assessing CO2 footprint of different blockchains/DLTs are very welcome.~~ **including standards for assessing CO2 footprint of different blockchains/DLTs**

EC to cross-check

5.2.1.4 EC Reply

New text proposed for Action 8 and Action 9

Action 8: ESOs to develop the standards needed for the Digital Euro (CBDC), if the European Central Bank (ECB) decides to its issuance, and for digital assets (MiCA Regulation), in particular to ensure interoperability with smart-contracts, legacy systems, etc, linked with either CBDCs or private money. As per Art. 24 of the draft digital euro Regulation proposed by the Commission in June 2023, to ensure conditional payments on digital euro, the ECB may adopt detailed measures, rules and standards that PSPs can use to ensure interoperable conditional digital euro payment transactions. ESOs to liaise with ECB and in particular with the Digital euro scheme rulebook development group to ensure coordination between the standards for conditional payments involving digital euro and other existing or future standards.

Action 9: In the context of the standardisation described in Action 8, ESO to develop standards towards assessing CO2 footprint of different blockchains/DLTs, MiCA, EU Sustainable Finance taxonomy.

New text proposed for A.1

On 24 September 2020, the European Commission presented a proposal for the Regulation of Markets in Crypto-assets (MiCA) as a part of its “Digital Finance Package”. The initiative aimed to establish a comprehensive legal framework governing crypto assets service providers, including issuers of crypto-assets that were not previously subject to EU financial services regulations such as MiFiD 2, Directive (EU) 2014/65), as well as providers of related services. Following a substantial refinement process, MiCA was published as Regulation (EU) 2023/1114, specifically applicable to the issuance and trading of tokens within non-MiFID DLT-based markets. Within the context of the 2020 Package, a Regulation on a pilot regime for market infrastructures based on distributed ledger technology was introduced, and published as Regulation (EU) 2022/858. Additionally, Regulation (EU) 2022/2554 on digital operational resilience for the financial sector (Digital Operational Resilience Act, or DORA) was published in June 2022, and shall apply from 17 January 2025.

5.2.1.5 Proposed comment

Section A.2 includes a reference to foreseen projects for standardisation, it is proposed to consider updating with current status and add reference to funded projects.

5.2.1.6 Proposed change

In section A.2

The Digital Europe Programme supports the European Blockchain Services Infrastructure (EBSI), the EU blockchain regulatory sandbox and ~~also has some foreseen some for blockchain and DLT standardisation~~ the project BlockStand.eu, specifically dedicated to advancing European blockchain standardisation started in May.

In Section C.2 add a paragraph:

BlockStand

BlockStand was launched in May 2023, funded under the European Union's Digital Europe Programme grant agreement no. 101102757. It supports the participation of European experts in blockchain standardisation activities at both European and international levels through and Experts' Selection Process. Other important outputs include a Standardisation Gaps & Recommendations Atlas, a European Blockchain Standardisation Roadmap, and a European Blockchain Leadership Outlook. An Executive Management Board, comprised of high-level experts in the blockchain field, also provides strategic steering. <https://blockstand.eu/>

5.2.1.7 Task Force Rolling Plan resolution

For text in A2 the following text is Accepted and ready to implement

The Digital Europe Programme supports the European Blockchain Services Infrastructure (EBSI), the EU blockchain regulatory sandbox and ~~also has some foreseen some for blockchain and DLT standardisation~~ respective projects mentioned in C.2 below.

EC to cross check

5.2.1.8 EC Reply

OK with the new text in A.2, but please also add in C.2 the project SeeBlocks.eu

SeeBlocks

SEEBLOCKS.eu, launched in May 2023, is a 24-month Digital Europe Programme project that aims at delivering a targeted, democratic, industry-driven initiative to support European interests in standardisation within the Blockchain/DLT domain, bringing together EU researchers and open standards specialists, along with industry and policy experts with the primary goal to provide a tangible contribution to the presence of European players in International Blockchain/DLT standardisation, through 4 recurring Selecting and Engaging Procedures (SEPs). <https://seeblocks.eu/>

5.2.2 RP 2024 chapter 3.0.1 Data Economy

5.2.2.1 Proposed comment

Smart contracts are mentioned across the chapter and required by the Data Act, yet no specific action is addressed to them

5.2.2.2 Proposed change

In Section B Insert a new Action related to the development of a harmonised European standard on smart contracts for the Data Act, in line with the adopted text (see <https://data.consilium.europa.eu/doc/document/ST-11284-2023-INIT/en/pdf>). The standard should aim to be technically neutral and not necessarily based on DLT that, however, are mentioned as a possible (and today unique) technology supporting smart contracts, therefore cross-referencing to Action 7 of the chapter 3.3.6 Blockchain & DLT is suggested.

5.2.2.3 Task Force Rolling Plan resolution

Rejected.

This is for the expected SR to define in detail and should not be precluded in the Rolling Plan

5.2.2.4 EC Reply

No further reaction.

5.2.3 RP 2024 chapter 3.1.3 Data interoperability

5.2.3.1 Proposed comment 1

Update - The bullet “Distributed ledger techniques” is too wide in this context, also considering the technologically neutral approach of the Data Act.

5.2.3.2 Proposed change

Update bullet text as follows:

“Distributed ledgers as infrastructure for smart contracts for data sharing”.

5.2.3.3 Task Force Rolling Plan resolution

EC to check -

as smart contracts need to be technology neutral, is mentioning "Distributed ledger techniques" here in the bullet list perhaps contradicting the Data Act?

The wording provided to the left is a proposal to prevent that. Alternatively also entire deletion of "Distributed ledger techniques" from the list may be an option.

5.2.3.4 EC Reply

Agree with entire deletion of DLT from the list, as smart contracts need to be technology neutral.

5.2.3.5 Proposed comment 2

Update - Text “(d) where applicable, the means to enable the interoperability of tools for automating the execution of data sharing agreements, such as smart contracts within their services and activities shall be provided” refers to smart contracts where the Data Act will require a harmonised standard, it’s suggested to link it with the Data Economy chapter.

5.2.3.6 Proposed change

Reference the Data Economy chapter for smart contracts standardization (where a new specific action is suggested in another comment).

5.2.3.7 Task Force Rolling Plan resolution

EC to check -

in connection with the previous line item

E.g. it could also be moved to the Data Economy chapter?

5.2.3.8 EC Reply

There is already a reference to smart contracts in the Data Economy chapter (at the end of Section A.2).

Moreover, the text of 3.1.3 is copied from Art. 28 of the Data Act proposal, so no modifications in the text are needed.

5.2.3.9 Proposed comment 3

Update - Action 9 states: “SDOs to look into possible standardisation needs arising from the proposed EU draft Data Act”. The data act also requires a standard for smart contracts that is not linked directly with Data interoperability.

5.2.3.10 Proposed change

Update Action 9 as follows:

“SDOs to look into possible standardisation needs about Data interoperability arising from the proposed EU draft Data Act”.

5.2.3.11 Task Force Rolling Plan resolution

Accepted and ready to implement.

EC to cross-check → Vague action. Would it be possible to have a dedicated meeting with the TFRP to discuss in more detail the actions in 3.0.1, 3.1.3 and 3.3.7?

5.2.3.12 EC Reply

OK.

5.2.4 RP 2024 chapter 3.3.2 e-Invoicing

5.2.4.1 Comment

Update - The last bullet of Action 1 “following the market and technological evolution in eInvoicing, ensure an active link with the work on Blockchain, in liaison with CEN/CENELEC/JTC 19 on Blockchain and Distributed Ledger Technologies” is not linked with any text in the policy section, the rationale for asking the action is not clear.

5.2.4.2 Proposed change

Please clarify.

5.2.4.3 Task Force Rolling Plan resolution

EC to check:

Is there a policy objective that gives the reason for having Blockchain and DLT mentioned in the bullet list under Action 1? If so it would be good to specify this reason in the policy text, A1 or A2, or in the action itself. Otherwise, the last bullet may also be deleted from Action 1.

5.2.4.4 EC Reply

EC reply: Add the following paragraph in A1 as policy context

"eInvoicing is evolving rapidly and innovative applications of eInvoicing and uses are developing, based on Blockchain, AI, RPA, etc. and this evolution will shape policy developments in the coming years."

5.2.5 RP 2024 chapter 3.3.5 Fintech and Regtech Standardisation

5.2.5.1 Proposed comment 1

Reference to political agreement in November 2021 regarding the pilot regime for market infrastructures based on Distributor Ledger Technology (DLT) is now a Regulation. This should be updated accordingly.

5.2.5.2 Proposed change

Please update as needed to reference the new Regulation (*Regulation (EU) 2022/858*).

5.2.5.3 Task Force Rolling Plan resolution

EC to check

in A2, as one of the bullets/sub-bullets, the pilot regime is mentioned. This has meanwhile become a regulation. The text should be updated and the respective regulation be added to the list of references in A3, as well.

5.2.5.4 EC Reply

replace the following paragraph.

Old text:

- A political agreement was reached in November 2021 amongst the co-legislators regarding the pilot regime for market infrastructures based on Distributor Ledger Technology (DLT) that wish to try to trade and settle transactions in financial instruments in crypto-asset form.

To be replaced by:

- Regulation (EU) 2022/858 of the European Parliament and of the Council of 30 May 2022 on a pilot regime for market infrastructures based on distributed ledger technology creates a regime in which market infrastructures can obtain exemptions from applicable financial regulations in order to be able to use distributed ledger technology (DLT) for the trading and settlement of securities transactions, thereby promoting the development of DLT in the financial sector while guaranteeing a high level of investor protection and transparency as well as preserving market integrity and financial stability.

5.2.5.5 Proposed comment 2

Action 1 asks for EU coordination; it is suggested that this also includes funded projects in the wording.

5.2.5.6 Proposed change

Update Action 1 as follows:

“Ensure EU level coordination on FinTech standardisation, with CEN & CENELEC, European Supervisory Authorities, Fora Consortia, Industry, and with Standards Setting Organisations (such as ISO). Also ensure proper coordination with Open Source and EC funded Projects (e.g. working on Blockchain).”

5.2.5.7 Task Force Rolling Plan resolution

Addition as proposed is accepted and ready to implement

BUT: it should be clarified who is the main addressee of the action, i.e. who should take the lead in coordinating.

Proposal: EC to start a coordinating activity or to ask CEN-CENELEC to act as coordinator.

EC to check on this.

5.2.5.8 EC Reply

EC supplied action 1 text

5.2.6 RP 2024 chapter 3.4.13 Circular economy

5.2.6.1 Proposed comment 1

Regarding Action 4, and in light of recent legislative / standardisation updates in both the DLT and DPP realms, a further highlighting of the potential of DLT in support of DPP could be added to bolster synergies.

5.2.6.2 Proposed change

Update Action 4 as below:

Action 4: SDOs to build on existing work and progress towards adding standardisation activities for circular economy objectives around the Digital Product Passport, notably building on DLT capacity developments.

5.2.6.3 Task Force Rolling Plan resolution

Rejected

At this stage discussions about the use of specific technologies for the DPP is in progress, therefore the Rolling Plan should not preclude consensus building by pointing at one specific technology.

5.2.6.4 EC Reply

No further reaction.

5.2.6.5 Proposed comment 2

Action 9 asks for SDO cooperation for developing use cases, it's suggested to add liaison with relevant stakeholders to ensure an inclusive approach.

5.2.6.6 Proposed change

Old text: **Action 9:** SDOs to cooperate on developing use cases for new and emerging technologies like AI and Blockchain in the context of circular economy and to start respective standardisation activities in order to support making these technologies available fast for supporting circular economy.

Update Action 9 as follows:

“SDOs to cooperate on developing use cases for new and emerging technologies like AI and Blockchain in the context of circular economy, also liaising with relevant stakeholders such as Open Source and EC funded Projects working on Blockchain, and to start respective standardisation activities in order to support making these technologies available fast to support a circular economy”.

5.2.6.7 Task Force Rolling Plan resolution

Accepted and ready to implement in the way below:

“SDOs to cooperate on developing use cases for new and emerging technologies like AI and Blockchain in the context of circular economy, also with relevant stakeholders such as Open Source and EC funded Projects working on Blockchain, and to start respective standardisation activities in order to support making these technologies available fast to support a circular economy”.

5.2.6.8 EC Reply

No further reaction.

5.3 Recommendations for the 2025 version of the Rolling Plan

Based on the expert contribution reports and deliverables provided, here is a synthesis of the key findings and recommendations, as well as suggested priorities and actions for consideration in the Rolling Plan 2025.

5.3.1 Key Findings and Recommendations

1. There is a need for standardization work on coupling abstract blockchain accounts with real ID identification methods, building on eIDAS², GDPR³, NIS⁴ and ePrivacy⁵ requirements. This could significantly boost adoption of blockchain wallets.
2. Guidance is needed on smart contract requirements for operating abstract blockchain accounts, to ensure consistency in identity verification methods offered to users.
3. Blockchain wallet providers should be enabled to become accredited legal trust anchors under eIDAS², rather than just relying on blockchain PKI. This would make blockchain ID solutions more user-friendly.
4. A standardization framework should be drafted for an EBSI-conformant and EUDI-based blockchain wallet that has PKI as trust anchor and utilizes zero-knowledge proofs and stealth addresses for privacy.
5. There are gaps in ISO blockchain standards related to security, privacy and identity management aspects unique to blockchain networks. New work items have been initiated to start addressing these.
6. More business and end-user inputs are needed in the development of ISO blockchain standards on security, privacy and identity to ensure they meet real-world needs. Participation from EU experts should be encouraged.
7. Coordination and liaisons between ISO committees working on different aspects of blockchain standards need to be strengthened to avoid overlap and inconsistencies.

5.3.2 Suggested Priorities and Actions for Rolling Plan 2025

The following list identify actions for possible consideration with the indication of the chapter(s) potentially impacted using the RP 2024 as reference:

1. Initiate standardization work on integrating abstract blockchain accounts with eIDAS² compliant real-world identity verification, considering GDPR and ePrivacy requirements

² Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework, see <https://eur-lex.europa.eu/eli/reg/2024/1183/oj>

³ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), see <http://data.europa.eu/eli/reg/2016/679/oj>

⁴ Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive), see <http://data.europa.eu/eli/dir/2022/2555/oj>

⁵ Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), see <http://data.europa.eu/eli/dir/2002/58/oj> (a regulation on Privacy and Electronic Communications was proposed by the Commission, with the document COM(2017) 10 final, to replace the Directive 2002/58/EC but no agreement was yet reached by the colegislators).

(Actions possibly impacted in Chapter 3.1.5 Electronic identification and trust services including e-signatures and Chapter 3.3.6 Blockchain & DLT).

2. Develop guidance on smart contract requirements for securely operating abstract blockchain accounts with delegated identity management (Potential new Action in Chapter 3.3.6 Blockchain & DLT).
3. Enable blockchain wallet providers to become accredited legal trust anchors under eIDAS2 to simplify user experience with blockchain identity solutions (Actions possibly impacted in Chapter 3.1.5 Electronic identification and trust services including e-signatures and Chapter 3.3.6 Blockchain & DLT).
4. Draft a framework for a privacy-preserving EBSI-conformant and EUDI-based blockchain wallet utilizing PKI, ZKPs and stealth addresses (Potential new/update Actions in Chapter 3.1.5 Electronic identification and trust services including e-signatures and Chapter 3.3.6 Blockchain & DLT).
5. Address gaps in ISO standards on blockchain security, privacy and identity management and strengthen coordination between different international and European committees, to ensure alignment and avoid duplication of efforts and ensuring inclusion of EU stakeholder requirements (Actions possibly impacted in Chapter 3.3.6 Blockchain & DLT).
6. Encourage greater participation of EU business and end-user representatives in blockchain standardization efforts at ISO to provide inputs on real-world needs (Actions possibly impacted in Chapter 3.3.6 Blockchain & DLT).

In summary, the expert contributions highlight the importance of aligning blockchain standardization efforts with EU regulatory frameworks like eIDAS2, GDPR and ePrivacy, especially in the areas of digital identity, wallets and smart contracts. Bridging gaps in existing ISO standards and enabling active EU stakeholder participation are priorities to shape future standards that meet Europe's needs. The suggested new actions aim to concretely advance efforts in these directions.

5.4 The 2025 contribution

This part is for the next version of this report (D3.2).

5.5 Recommendations for the 2026 version of the Rolling Plan

This part is for the next version of this report (D3.2).

6. Conclusions and Next Steps

This report provides an overview of BlockStand's activities and contributions towards contributions to the Rolling Plan taking into account the evolving landscape of blockchain and distributed ledger technologies.

The three key goals outlined in Chapter 3 - actionable topics in the Rolling Plan, clear priorities, and policy alignment with technical neutrality - have guided BlockStand's efforts to deliver concrete recommendations, identified dependencies between actions, and provide regular updates to keep the Rolling Plan relevant and responsive to the needs of stakeholders.

BlockStand's contributions, as detailed in Chapter 5, span the development of new standards, addressing gaps in existing ones, and fostering coordination among SDOs and the broader blockchain community. The project's working method (section 5.1) emphasizes comprehensive review, stakeholder engagement, and the formulation of actionable recommendations to maximize impact.

Several key recommendations have emerged for consideration in the Rolling Plan 2025 (section 5.3).

Before formally submitting these recommendations to the European Commission, BlockStand will seek validation from its Executive Management Board (EMB). The EMB's blockchain standardization expertise, coupled with its mandate to ensure alignment with EU strategic objectives, makes it ideally positioned to assess the relevance, opportunity and feasibility of the proposed actions.

7. DISCLAIMER

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