



Council of the European Union
General Secretariat

Brussels, 25 July 2025

WK 10285/2025 INIT

LIMITE

TELECOM

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
Subject:	Draft Council Conclusions on European Competitiveness in the digital decade (ST 11033/25) - NL comments

Delegations will find in the annex the NL comments on the Draft Council Conclusions on European Competitiveness in the digital decade (ST 11033/25) .

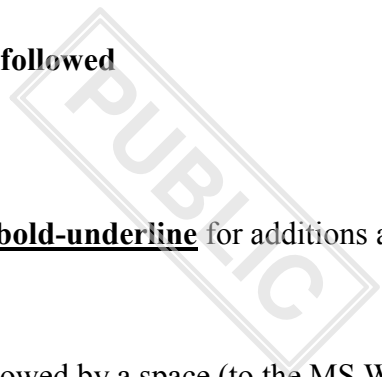
Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use 'track changes' or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**).

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments ondocx**

Thank you for your cooperation!



Presidency text	Drafting suggestions	Comments
<p><u>General comments</u></p>		<p>The Netherlands welcomes the presidencies initiative to reflect on digital competitiveness and the upcoming review of the Digital Decade Policy Program (DDPP).</p> <p>This first draft presents a very solid basis for further negotiations. The Netherlands has the following main priorities:</p>

Presidency text	Drafting suggestions	Comments
		<p>1. We propose to invite the Commission to include a target indicator for sustainable digital infrastructure in the context of the DDPP review. This would be a reaffirmation of the Council Conclusions on the Future of Digital Policy of May 2024.</p> <p>2. We propose to include the suggestion to measure technological sovereignty in the annual State of the Digital Decade report and discuss it's findings in the Digital Decade Board</p> <p>3. We do not support the suggested target indicators on permit granting and cloud in paragraph 24. These target indicators are insufficiently outcome-oriented.</p>
<u>ANNEX</u>		
DRAFT COUNCIL CONCLUSIONS		

Presidency text	Drafting suggestions	Comments
EUROPEAN COMPETITIVENESS IN THE DIGITAL DECADE		
THE COUNCIL OF THE EUROPEAN UNION,		
RECALLING		
– The Decision of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme,		
	<u>The European Declaration on Digital Rights and Principles for the Digital Decade of 23 January 2023</u>	The conclusions and mentioned actions and initiatives need to be in accordance with this declaration, as well as with the European values and fundamental rights.
– The European Economic Security Strategy of 20 June 2023,		

Presidency text	Drafting suggestions	Comments
– The European Council Conclusions of 18 April 2024,		
– The Council Conclusions of 24 May 2024 on a competitive European industry driving our green, digital and resilient future,		
– The Niinistö Report “Safer together: A path towards a fully prepared Union”, 20 March 2024,		
– The Letta Report “Much more than a market: Speed, Security, Solidarity”, 17 April 2024,		
– The Draghi Report “The future of European competitiveness”, 9 September 2024,		
– The Competitiveness Compass adopted by the Commission on 29 January 2025		

Presidency text	Drafting suggestions	Comments
– The Joint Communication from the Commission and the High Representative on an International Digital Strategy of 4 June 2025.		
– The 2025 State of the Digital Decade adopted by the Commission on 16 June 2025		
– [The Communication from the Commission of [XX] 2025 on a Apply AI Strategy		
– The Communication from the Commission of [XX] 2025 on a Data Union]		
BUILDING ON		
– The Council Conclusions of 21 May 2024 on “The Future of EU Digital Policy”,		

Presidency text	Drafting suggestions	Comments
– The Council Conclusions of 6 December 2024 on the Commission White Paper “How to master Europe’s digital infrastructure needs”,		
– The Council Conclusions of 6 June 2025 on reliable and resilient connectivity,		
– [The Council Conclusions of [20 October] 2025 on Advancing an International Digital Strategy.]		
Strengthening European Competitiveness with the Digital Decade as a strategic compass for a sovereign digital transformation		
1. STRESSES that strengthening the EU’s digital competitiveness is a core strategic objective, critical to fostering innovation,	STRESSES that strengthening the EU’s digital competitiveness <u>while safeguarding fundamental rights and public values</u> is a core	According to Draghi’s analysis, the EU’s competitiveness should be strengthened while maintaining the European social model that

Presidency text	Drafting suggestions	Comments
productivity, welfare and sustainable growth across the EU.	strategic objective, critical to fostering innovation, productivity, welfare and sustainable growth across the EU.	observes fundamental rights and promotes public values like consumer protection. This element should be reflected in the council conclusions.
2. NOTES with concern that the <i>2025 State of the Digital Decade</i> report and country assessments indicate that the EU is not on track to meet its 2030 targets, particularly in areas vital to digital competitiveness such as AI uptake and SME digitalisation. STRESSES the need for accelerated efforts at both EU and national level to address this shortfall.		
3. REITERATES that the Digital Decade Policy Programme (DDPP) serves as the EU's strategic compass for navigating the digital transformation and building long-term digital competitiveness and sovereignty.		
4. UNDERLINES the importance of		

Presidency text	Drafting suggestions	Comments
maintaining the DDPP's ambition and coherence, while updating it in a targeted and evidence-based manner to ensure its continued relevance.		
5. Looking ahead to the upcoming 2026 review of the DDPP, RECOMMENDS that the Commission seizes this opportunity to reinforce, in cooperation with Member States, the EU's digital competitiveness, sovereignty and economic security.		
Digitalisation and AI as key drivers for competitiveness		
6. EMPHASISES the central role that the development and uptake of digital technologies play in enhancing the EU's competitiveness and sovereignty, and STRESSES the urgent need to strengthen the EU's capacity to develop, adopt and govern such technologies and their		

Presidency text	Drafting suggestions	Comments
underlying infrastructure.		
7. RECOGNISES the importance of building on the EU's competitive strengths and the digital single market as the foundation for accelerating digital development and uptake.		
8. WELCOMES the Commission's AI Continent Action Plan as a major roadmap for the EU's AI leadership and REITERATES the commitment of the Commission and the Member States to jointly foster the European AI innovation ecosystem and ensure a regulatory framework that supports innovation.	WELCOMES the Commission's AI Continent Action Plan as a major roadmap for the EU's AI leadership and REITERATES the commitment of the Commission and the Member States to jointly foster the European AI innovation ecosystem and <u>ensure implementation of the regulatory framework, most notably the AI Act, in a way</u> that supports innovation	Swift implementation of the regulatory framework for AI is essential for legal clarity that is needed for innovation. The AI Office and member states should continue collaboration and efforts to adopt an implementation strategy that supports innovation

Presidency text	Drafting suggestions	Comments
Effective, simplified and coordinated digital regulation		
9. EMPHASISES the importance of ensuring that digital regulation is simple, clear, proportionate and predictable, in order to reduce unnecessary complexity and compliance costs for businesses, in particular SMEs, while ensuring the protection of consumers and citizens across the single market and beyond.	EMPHASISES the importance of ensuring that digital regulation is simple, clear, proportionate and predictable, in order to reduce unnecessary complexity and disproportionate compliance costs for businesses, in particular SMEs, while ensuring the protection of consumers and citizens across the single market and beyond.	It's important to make a distinction between compliance costs that are proportionate and essential for achieving the politically agreed goals of (new) digital regulation, and compliance costs that are significant but are not essential for achieving the intended policy goals . Therefore the council should only call for reduction of disproportionate compliance costs. For example by a commitment to refrain from additional provisions and measure that increase these costs and render them disproportionate, especially by gold-plating EU regulation.
10. [WELCOMES / LOOKS FORWARD TO <i>(depends on the timing)</i>] the Digital Package by the Commission, and its ambition to reduce regulatory burdens and ensure fitness of the EU's digital acquis. COMMITS to allocate its	[WELCOMES / LOOKS FORWARD TO <i>(depends on the timing)</i>] the Digital Package by the Commission, and its ambition to reduce unnecessary regulatory burdens and ensure fitness of the EU's digital acquis. COMMITS to	For the Netherlands it's essential that the simplification exercise is primarily aimed at reducing complexity and unnecessary administrative burdens of digital regulation. A revision of digital regulation that amends or

Presidency text	Drafting suggestions	Comments
full attention to the Commission's digital simplification proposals in view of delivering swiftly on the shared objective of simplifying regulation for a competitive single market.	allocate its full attention to the Commission's digital simplification proposals in view of delivering swiftly on the shared objective of simplifying regulation for a competitive single market <u>while maintaining the goals and standards of the digital rulebook</u>	lowers politically agreed goals should not be in scope. It is important to keep the intended objectives of the digital acquis in mind when pursuing the simplification exercise.
11. URGES the systematic use of stress-tests of the acquis with a strong focus on competitiveness, simplification and enforcement feasibility. In this context, STRESSES the importance of the Commission's consistent use of Digital Statements, in order to clearly communicate digital implications and support more efficient implementation of new EU legislation.	URGES RECOMMENDS the systematic use of stress-tests of the acquis with a strong focus on competitiveness, simplification and enforcement feasibility. In this context, STRESSES the importance of the Commission's consistent use of Digital Statements, in order to clearly communicate digital implications and support more efficient implementation of new EU legislation.	NL can see value in use of stress-tests but would suggest to use less prescriptive language that would leave room for the judgement of Commission to use the instrument when appropriate.
12. EMPHASISES that delivering on the EU's digital ambitions requires the full and coherent implementation and application of newly adopted rules, including through		

Presidency text	Drafting suggestions	Comments
<p>enhanced cooperation and the exchange of best practices among Member States; CALLS FOR more structured and proactive dialogue between relevant enforcement authorities and EU institutions, including through joint guidance and better alignment of definitions and regulatory frameworks, as well as efforts to explore shared supervision models and interoperable national infrastructures where relevant.</p>	<p></p>	<p></p>
<p>13. STRESSES that well-designed digital tools can play a key role in strengthening the EU’s competitiveness by reducing administrative burdens and improving the user experience for businesses and public administrations alike. STRESSES that such tools should be developed through a use-case driven approach where there is clear need and added value – particularly for SMEs – and implemented in a way that respects national</p>	<p>STRESSES that well-designed digital tools can play a key role in strengthening the EU’s competitiveness by reducing administrative burdens and improving the user experience for businesses and public administrations alike. STRESSES that such tools should be developed through a use-case driven approach where there is clear need and added value – particularly for SMEs – and implemented in a way that respects national digital infrastructures, existing well-</p>	<p></p>

Presidency text	Drafting suggestions	Comments
<p>digital infrastructures, existing well-functioning solutions and best practices. INVITES the Commission to set concrete, measurable objectives for administrative burden reduction through digitalisation, in particular in the context of the DDPP review.</p>	<p>functioning solutions, best practices <u>and that insures interoperability.</u> INVITES the Commission to set concrete, measurable objectives for administrative burden reduction through digitalisation, in particular in the context of the DDPP review.</p>	
<p>14. ENCOURAGES Member States to implement the EU Digital Identity Wallets, ensuring citizens and residents can access services in a safe, reliable, and privacy-preserving manner. UNDERLINES the importance of applying a “wallet-by-default” principle in upcoming as well as existing EU legislation, with a view to streamline digital solutions, avoid fragmentation and fully realise the Wallets’ potential across borders. In this</p>	<p>ENCOURAGES Member States to implement the EU Digital Identity Wallets, ensuring citizens and residents can access services in a safe, reliable, and privacy-preserving manner. UNDERLINES the importance of applying a “wallet-by-default” principle <u>promoting a “wallet-first” approach</u> in upcoming as well as existing EU legislation, with a view to streamline digital solutions, avoid fragmentation and fully realise the Wallets’ potential across</p>	<p>This paragraph highlights the ambition to promote the use of EU Digital Identity Wallets as a secure and privacy-respecting means for citizens and residents to access services. Encouraging their adoption across borders and aligning legislation to support digital solutions are important steps toward a more connected digital Europe. However, at this stage, the foundation of the ecosystem must first be solidified before moving towards a “wallet-by-</p>

Presidency text	Drafting suggestions	Comments
<p>context, CALLS FOR a mainstreamed use of the upcoming European Business Wallet, as well as the Digital Product Passport and eInvoicing, recognising their potential to simplify and digitalise business-to-government and business-to-business interactions.</p>	<p>borders. In this context, CALLS FOR a mainstreamed use of the upcoming European Business Wallet, as well as the Digital Product Passport and eInvoicing, recognising their potential to simplify and digitalise business-to-government and business-to-business interactions.</p>	<p>default” principle. Ensuring and underlining voluntary use will foster trust and allow for broader, more inclusive adoption. Additionally, we believe that the European Business Wallet proposal can contribute to reducing administrative burdens for businesses and improving service delivery by fostering harmonization and reducing fragmentation across various solutions.</p>
<p>15. Furthermore, UNDERLINES the need for simpler assessment of progress towards the EU digital targets and objectives, and for a more strategic and targeted reporting cycle to ensure a stronger focus on the added value of policy, while considering resource constraints in both the Commission and Member States. In particular, INVITES the Commission to reconsider the annual publication of full country reports, given that policy effects often take time to materialise and may depend on broader</p>		

Presidency text	Drafting suggestions	Comments
synergies. This should not be at the cost of consistent monitoring of the progress.		
16. RECALLS that the Digital Decade Board is intended to serve not only as a forum for coordination, but also for providing early input and political guidance on Union-level digital policy ¹ . INVITES the Commission and Member States to further develop this strategic role by strengthening the Board's capacity to support coherent implementation, foster coordination with other governance bodies established under the digital acquis, facilitate mutual learning and best practice exchange, and enable joint analysis and stress-testing of regulation.		

¹ Cf. Commission Decision C(2022) 7141

Presidency text	Drafting suggestions	Comments
Fostering innovation and uptake of digital technologies		
<p>17. ACKNOWLEDGES that long-term European competitiveness depends on a dynamic, innovation-driven digital economy, and STRESSES the importance of improving framework conditions for the development, testing, scaling and uptake of sustainable digital technologies across all sectors. UNDERLINES that this requires a forward-leaning approach rooted in research excellence, regulatory agility, access to capital and the removal of unnecessary barriers to experimentation and growth. HIGHLIGHTS the need to effectively bolster the “research-to-market” pathway in full and to have this ambition reflected in the DDPP, including in its monitoring mechanism.</p>		
18. [WELCOMES the Commission’s Apply		

Presidency text	Drafting suggestions	Comments
AI Strategy <i>(to be developed later).</i>]		
19. [WELCOMES the Commission’s Data Union Strategy, <i>(to be developed later).</i>]		
20. NOTES that the target on deploying 10,000 edge nodes may no longer reflect technological or market realities and could therefore be reconsidered. HIGHLIGHTS the relevance of ensuring access to computing capacity among the DDPP targets.		We endorse the proposed text on edge node targets and on computing capacity
Reinforcing digital sovereignty		
21. UNDERLINES the importance of strengthening the EU’s digital sovereignty and economic security through a bold, effective, open, risk- and evidence-based strategic approach. SUPPORTS greater European capacity and leadership in critical digital technologies, while STRESSING that	UNDERLINES the importance of strengthening the EU’s digital sovereignty and economic security through <u>an open, strategic</u> , bold, effective, <u>coherent</u> , open , risk- and evidence-based strategic approach <u>in the entire digital technology stack</u> . SUPPORTS greater European capacity and	The phrase “including simpler, more proportionate and predictable regulation” is redundant given the earlier mention of ‘clear, innovation-friendly rules’ in this paragraph and the specific paragraphs in these council conclusions about simplification of regulation

Presidency text	Drafting suggestions	Comments
<p>sovereignty equally relies on a strong and well-functioning single market with clear, innovation-friendly rules and better framework conditions for growth – including simpler, more proportionate and predictable regulation – and underpinned by strategic global collaboration and investment to ensure openness and diversified digital supply chains. CONSIDERS that such a balanced approach could be integrated in the DDPP review.</p>	<p>leadership in critical digital technologies, <u>such as semiconductors, quantum, AI, cloud and cybersecurity</u>, while STRESSING that sovereignty equally relies on a strong and well-functioning single market with clear, innovation-friendly rules and better framework conditions for growth —including simpler, more proportionate and predictable regulation— and underpinned by strategic global collaboration and <u>public as well as private</u> investment to ensure openness and diversified digital supply chains. CONSIDERS that such a balanced approach could be integrated in the DDPP review.</p>	
<p>22. RECOGNISES the importance of strengthening Europe’s data infrastructure as an enabler for the development and deployment of advanced digital technologies such as AI. RECOMMENDS maintaining a high level of ambition in the development and deployment of</p>	<p>RECOGNISES the importance of strengthening Europe’s data infrastructure as an enabler for the development and deployment of advanced digital technologies such as AI. RECOMMENDS maintaining a high level of ambition <u>commitment to</u> in the development</p>	<p>Digital infrastructure is the backbone of Europe's digital economy. Strong, secure infrastructure is essential for economic growth, innovation, and digital sovereignty. We support maintaining high-level commitment for the deployment of digital infrastructure and the</p>

Presidency text	Drafting suggestions	Comments
<p>sustainable digital infrastructure, in particular as part of the forthcoming DDPP review.</p>	<p>and deployment of sustainable digital infrastructure, <u>while upholding technology neutrality</u>, in particular as part of the forthcoming DDPP review. <u>order to achieve gigabit connectivity in 2030.</u></p>	<p>current Digital Decade target gigabit for everyone while upholding technology neutrality. The rollout of technologies like fibre and 5G is progressing at a steady pace. Therefore, we propose to maintain the current targets of VHCN rollout.</p>
<p>23. In this regard, LOOKS FORWARD to the forthcoming EU Cloud and AI Development Act as a key initiative to enhance access to data centres and compute capacities in Europe and foster a more diverse and competitive cloud landscape.</p>	<p>In this regard, LOOKS FORWARD to the forthcoming EU Cloud and AI Development Act as a key initiative to enhance access to data centres and compute capacities in Europe, foster a more diverse and competitive cloud landscape, <u>and develop an EU-wide definition of what constitutes “sovereign cloud”.</u></p>	<p>The EU cloud market is being flooded with propositions of so-called ‘sovereign cloud’. We observe a lot of ‘sovereignty washing’, caused in part by the lack of a uniform EU-wide definition of sovereign cloud. Cloud users need to be sure that the services they procure are in fact giving them the sovereignty and protection they desire. Therefore, it would be important to develop a uniform EU-wide definition. In our view, the CADA would be a suitable legislative</p>

Presidency text	Drafting suggestions	Comments
		act to define a definition.]
	<p><u>XX. Furthermore, INVITES the Commission to consider, as part of the DDPP review, to develop indicators that measure technological sovereignty throughout the digital technology stack, for instance based on market share of European versus non-European vendors and level of public and private investment in different key digital technologies. The performance of the EU on these indicators could be included in a new sovereignty annex of the annual state of the digital decade report and discussed in the Digital Decade Board.</u></p>	<p>Tacking stock of dependencies in the digital technology stack in the EU would be a very useful tool for developing policies and inform decision making that support the EU priority of tech sovereignty. We suggest to include periodic measurement of technological sovereignty in the annual state of the digital decade report and possibly discuss the results with the member states in the digital decade board.</p>
<p>24. Furthermore, INVITES the Commission to consider, as part of the DDPP review, targets on:</p>		
<p>i. the processing time for permitting digital infrastructure projects in the EU,</p>	<p>the processing time for permitting digital infrastructure projects in the EU,</p>	<p>We are not in favour of setting absolute targets on the processing time for permitting digital infrastructure projects. Different, and often</p>

Presidency text	Drafting suggestions	Comments
		<p>multiple, permits are required for digital infrastructure projects, with diverging deadlines. This also differs between member states due to diverse legal and institutional practices with regard to permitting.</p> <p>Furthermore, this will likely impact the implementation of the GIA and Single Information Points (SIPs) where a maximum processing time for permitting is also in place and sharing of information of information on these processing time very much depends on the set-up of a MS's CIP (for which the GIA provides flexibility).</p> <p>Therefore, indicators for monitoring processing time for permitting digital infrastructure should not go beyond the existing legal obligations. Data gathering would also entail a significant administrative burden.</p>

Presidency text	Drafting suggestions	Comments
<p>ii. promoting the uptake of open-source and multi-cloud solutions in both the public and private sectors, with a view to improving transparency, enhancing interoperability and reducing reliance on single providers,</p>	<p>promoting the uptake of open-source and multi-cloud solutions in both the public and private sectors, with a view to improving transparency, enhancing interoperability and reducing reliance on single providers,</p>	<p>Although we appreciate the potential added value of increased uptake of open-source and multi-cloud, we do not support setting absolute targets on its uptake in both the private and public sector. Companies and (governmental) organisations should be free in choosing their preferred cloud provider and cloud services. Government policies should enable them to switch between services or integrate services of multiple providers when they please to do so. However, we strongly believe that especially companies, but also governmental organisations should maintain discretionary space to make their own (informed) decision on their cloud mix.</p> <p>Hence, we would oppose the suggestion to set specific targets, but we could see the added value of including an action in the Council Conclusions to monitor the uptake of open-source and multi-cloud.</p>

Presidency text	Drafting suggestions	Comments
<p>iii. championing effective cloud switching in the EU – in order to reduce vendor lock-in, strengthen interoperability and support the uptake of competitive and sovereign digital solutions – such as average switching time between cloud providers, or the proportion of organisations switching cloud providers over a defined period.</p>	<p>championing effective cloud switching in the EU – in order to reduce vendor lock-in, strengthen interoperability and support the uptake of competitive and sovereign digital solutions – such as monitoring average switching time between cloud providers, or the proportion of organisations switching cloud providers over a defined period.]</p>	<p>In our view, absolute targets on the proportion of switching and the switching time are less relevant than the perceived ability of cloud users to switch providers. The mere fact that switching between providers is possible, could already give cloud users leverage to negotiate better terms with their current providers – as such switching is no goal of its own.</p> <p>Hence, we would oppose the suggestion to set specific targets, but we could see the added value of including an action in the Council Conclusions to monitor the proportion of switching and the switching time.</p>
	<p><u>XX. RECOGNISES that the environmental sustainability of digital infrastructure is essential not only to achieve the objectives of the European Green Deal and reducing carbon emissions, but also to ensure strategic autonomy, resource resilience and</u></p>	<p>In the council conclusions on the future of digital policy of last year (paragraphs 32-36), the member states underlined the necessity for the digital transition to go hand in hand with the green transition and suggested to look into the possibility of a target indicator for a greener</p>

Presidency text	Drafting suggestions	Comments
	<p><u>competitiveness of digital technologies.</u> <u>Therefore, INVITES the Commission to consider, in light of the upcoming review of the DDPP, the development of a dedicated target indicator on sustainable digital infrastructure.</u> <u>STRESSES that such a target indicator should take a holistic approach, for example addressing issues such as energy efficiency of digital technologies, the use of renewable energy for and water efficiency of datacentres and circularity of critical raw materials.</u></p>	<p>digital transition. The Netherlands proposes to reaffirm the necessity of a sustainable digital transition and invite the Commission to explore possibilities of developing a target indicator in the context of the review of the DDPP.</p>
Next steps		
<p>25. In line with the “one-in, one-out” principle, ENCOURAGES the Commission to assess whether some of the existing DDPP targets could be replaced by – or integrated with – new targets, such as the proposals set out in these Council Conclusions, considering their</p>	<p>In line with the “one-in, one-out” principle, ENCOURAGES the Commission to <u>carefully</u> assess whether some of the existing DDPP targets could be replaced by – or integrated with – new targets, such as the proposals set out in these Council Conclusions, considering their</p>	<p>We are not in favour of the “one-in, one-out” principle for Digital Decade targets. The “one-in, one-out” principle originates from the idea to reduce administrative burdens when proposing new legislation. We do not consider setting new targets and goals necessarily in the same</p>

Presidency text	Drafting suggestions	Comments
<p>policy relevance, feasibility of monitoring, availability of data and overall administrative burden.</p>	<p>policy relevance, feasibility of monitoring, availability of data and overall administrative burden.</p>	<p>manner. On the contrary, we should not limit our ambitions and goals to a specific number, but rather assess the need for such targets and goals on an evidence based analysis and political agreement between member states. Furthermore we want to emphasize careful consideration before changing or adjusting existing KPIs in order to ensure stability and continuity of our efforts to achieve the Digital Decade goals</p>
<p>26. LOOKS FORWARD to continued discussions in the Council and the Digital Decade Board on strengthening the EU’s digital competitiveness, within the framework of the Digital Decade and beyond.</p>		