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General Secretariat

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CONTRIBUTION

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

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

Draft Council Conclusions on European Competitiveness in the digital decade

Deadline: *25 July 2025*

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
<u>General comments</u>		
<u>ANNEX</u>		
DRAFT COUNCIL CONCLUSIONS		
EUROPEAN COMPETITIVENESS IN THE DIGITAL DECADE		

Draft Council Conclusions on European Competitiveness in the digital decade

Deadline: *25 July 2025*

Presidency text	Drafting suggestions	Comments
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,		
– The European Economic Security Strategy of 20 June 2023,		
– 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,		

Draft Council Conclusions on European Competitiveness in the digital decadeDeadline: *25 July 2025*

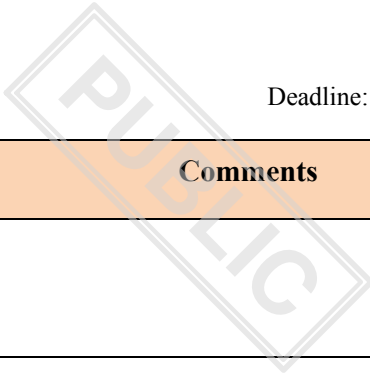
Presidency text	Drafting suggestions	Comments
– The Niinistö Report “Safer together: A path towards a fully prepared Union”, 20 March 2024,		
– The Letta Report “Much more than a market: Speed, Security, Solidarity”, 17 April 2024,		
– The Draghi Report “The future of European competitiveness”, 9 September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

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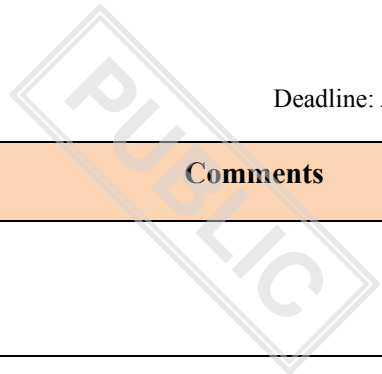
Presidency text	Drafting suggestions	Comments
– [The Communication from the Commission of [XX] 2025 on a Apply AI Strategy		
– The Communication from the Commission of [XX] 2025 on a Data Union]		
BUILDING ON		
– The Council Conclusions of 21 May 2024 on “The Future of EU Digital Policy”,		
– The Council 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,		

Presidency text	Drafting suggestions	Comments
– [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, productivity, welfare and sustainable growth across the EU.	1. <u>STRESSES that strengthening the EU’s digital competitiveness is a core strategic objective, critical to fostering innovation, productivity, welfare prosperity, sustainable growth and economic security across the EU.</u>	<u>GER suggests adding “prosperity” and “economic security”.</u>
2. NOTES with concern that the 2025 <i>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		



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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 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		



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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 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	<u>WELCOMES the Commission's AI Continent Action Plan as a major roadmap for the EU's AI leadership and REITERATES the commitment</u>	<u>GER suggests adding "maintaining a high level of protection in relation to health, safety and fundamental rights". A regulatory framework</u>

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<p>commitment of the Commission and the Member States to jointly foster the European AI innovation ecosystem and ensure a regulatory framework that supports innovation.</p>	<p><u>of the Commission and the Member States to jointly foster the European AI innovation ecosystem and ensure a regulatory framework that supports innovation, while maintaining a high level of protection in relation to health, safety and fundamental rights as well as respecting rights of third parties, such as intellectual property rights.</u></p>	<p><u>must not only support innovation, but also maintaining a high level of protection in relation to health, safety and fundamental rights. Their protection is a critical pillar of a responsible and inclusive digital transition.</u></p> <p><u>GER suggests adding the importance of the protecton of intellectual property rights. It is imperative that the interests of the cultural and creative industries are taken into account in the development of an internationally competitive European AI ecosystem.</u></p> <p><u>To this end, existing rights to works on which AI is based must be respected. Rights holders and creatives must participate in the added value that AI brings to society and be remunerated appropriately. After all, generative AI would simply not be possible without the copyrighted works of creatives. High-quality and legally secure data is essential for the development and use of trustworthy and competitive AI. Legal</u></p>

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		<p><u>uncertainty is an obstacle to innovation. At the same time, legally compliant AI developments can only take place if the rights of the rights holders to their works on which the AI is based are respected.</u></p>
Effective, simplified and coordinated digital regulation		
<p>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.</p>	<p><u>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 developers and deployers, in particular SMEs and public authorities, and to reduce uncertainty, while ensuring the protection of consumers, workers and citizens across the single market and beyond and the protection of intellectual property rights.</u></p>	<p>The goal of acting predictable is reducing uncertainty. GER suggests adding employees since digitalisation and digital regulation has significant impact on employees and the workplace. Poor regulations risks stifling AI adoption not only in businesses but also public services. GER suggests adding the aspect of the protection of intellectual property rights.</p>

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	<p><u>EMPHASISES that clear and expedient regulation that provides adequate protection is crucial to build trust in new technologies among consumers, users, workers, deployers and investors.</u></p>	<p><u>GER suggests adding the aspect of trust.</u></p>
<p>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. COMMITTS to 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.</p>	<p><u>10. [WELCOMES / LOOKS FORWARD TO <i>(depends on the timing)</i>] the Digital Package by the Commission, and its ambition to simplify and reduce regulatory burdens, increase coherence and ensure fitness of the EU’s digital acquis. COMMITTS to 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 without compromising relevant standards.</u></p> <p><u>URGES the Commission to carry out together with the Member states, relevant authorities and stakeholders further</u></p>	<p><u>GER suggests adding simplification as an ambition of the Digital Package.</u></p> <p><u>GER suggests adding the aspect of upholding relevant standards.</u></p> <p><u>GER suggests adding a specific reference to the GDPR.</u></p>

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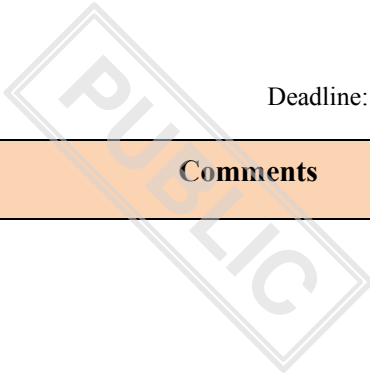
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	<u>assessments of the interplay of the GDPR with the digital rulebook in order to reduce regulatory burden, especially on SME and start-ups.</u>	
11. URGES the systematic use of stress-tests of the acquis with a strong focus on competitiveness, simplification 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.	<u>URGES the systematic use of stress-tests of the acquis with a strong focus on competitiveness, simplification, harmonization of existing (digital) regulation 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.</u>	<u>Harmonization of existing legislation is not mentioned, but is an important prerequisite for effective national implementation</u>
12. EMPHASISES that delivering on the EU's digital ambitions requires the full and coherent implementation and application of newly adopted rules, including through enhanced cooperation and the exchange of best practices among Member States; CALLS FOR	<u>12. EMPHASISES that delivering on the EU's digital ambitions requires the full and coherent implementation and application of newly adopted rules, including through enhanced cooperation and the exchange of best practices among Member States; CALLS FOR</u>	

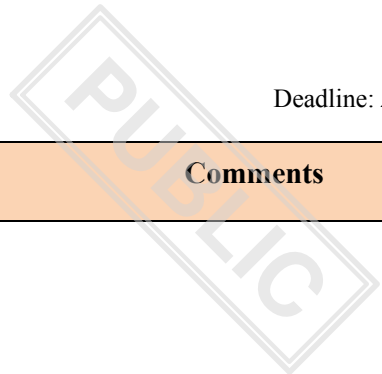
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<p>more structured and proactive dialogue between relevant enforcement authorities and EU institutions, including through joint guidance and better alignment of definitions and regulatory frameworks, as well as efforts to explore shared supervision models and interoperable national infrastructures where relevant.</p>	<p><u>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, involving political and strategic guidance from the Member States where appropriate.</u></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><u>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</u></p>	<p><u>The invitation risks setting up even more administrative burden.</u></p>

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<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><u>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.</u></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>		



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<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>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 synergies. This should not be at the cost of consistent monitoring of the progress.</p>		



Draft Council Conclusions on European Competitiveness in the digital decade

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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

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<p>Fostering innovation and uptake of digital technologies</p>		
<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>		
<p>18. [WELCOMES the Commission’s Apply AI Strategy <i>(to be developed later)</i>.]</p>		

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<p>19. [WELCOMES the Commission's Data Union Strategy, (to be developed later).]</p>		<p><u>As the European Data Union strategy develops, it is important to recognize that the protection of intellectual property, copyright and related rights is essential throughout the data ecosystem, both for data access and data use, as well as for the development and deployment of artificial intelligence (AI) systems and international data flows.</u></p> <p><u>At the same time, data must be made accessible for the public good as much as possible, especially collected by public services or by publicly funded initiatives, while respecting the privacy of natural persons.</u></p>
<p>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.</p>		<p><u>Regarding the general challenges of skilled labour shortage, demographic change and the current figures (currently 10.3 million ICT specialists are employed across the EU), GER would like to draw attention to the fact that the goal of employing 20 million ICT specialists by</u></p>

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		<u>2030 seems not achievable and should therefore be adapted.</u>
Reinforcing digital sovereignty		
<p>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 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</p>		

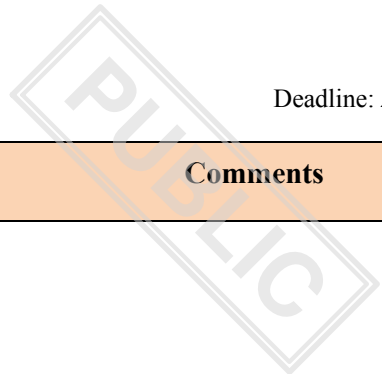
Presidency text	Drafting suggestions	Comments
integrated in the DDPP review.		
<p>22. RECOGNISES the importance of strengthening Europe’s data infrastructure as an enabler for the development and deployment of advanced digital technologies such as AI.</p> <p>RECOMMENDS maintaining a high level of ambition in the development and deployment of sustainable digital infrastructure, in particular as part of the forthcoming DDPP review.</p>		<p><u>What is meant by “data infrastructure”. GER suggests to be more specific.</u></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>		

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<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><u>In Germany, the necessary data is not collected and is therefore not available. Corresponding reporting requirements would have to be created. This would create new bureaucracy. We cannot support this point and request that it be deleted.</u></p>
<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>iii. championing effective cloud switching in the EU – in order to reduce vendor lock-in, strengthen interoperability and support the</p>		

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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.		
Next steps		
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 policy relevance, feasibility of monitoring, availability of data and overall administrative burden.		
	<u>ENCOURAGES Commission to continue its ambitious agenda to simplify the digital acquis, while ensuring that all new legislation, including tertiary legislation, follows the same</u>	<u>GER suggests adding the inclusion of further efforts to simplify the digital acquis.</u>



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	<u>aim and is simple, clear, proportionate, digital by default and predictable.</u>	
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.		

