



Council of the European Union
General Secretariat

Brussels, 25 July 2025

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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) - BE comments
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Delegations will find in the annex the BE 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*

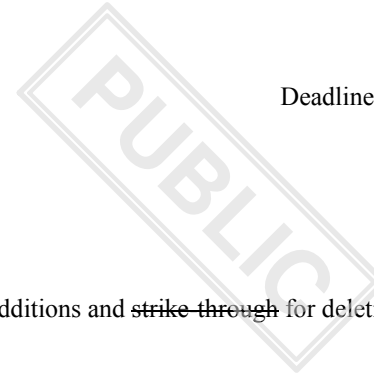
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Please kindly provide your contributions in the table below.

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		

Presidency text	Drafting suggestions	Comments
THE COUNCIL OF THE EUROPEAN UNION,		<p>We thank the DK PDCY for this first draft of Council Conclusions regarding the European Competitiveness in the Digital Decade. We support the content of the draft, especially with regards to the Effective, simplified and coordinated digital regulation. We consider that the Omnibus package reflects a good example of such simplified, coordinated and digital regulation. We believe that similar initiative should be undertaken in the future, with continued engagement of the stakeholders (public sector, academic, private sector,...). Moreover, we express our additional support regarding elements related to AI, which we believe align with our candidacies to both AI Factory and AI Antenna, as well as our national AI Strategy which aims at strengthening the competitiveness and attractiveness of Belgium thanks to AI and is closely linked to our broader Strategy of developing a data-driven economy with a high performing infrastructure. We also</p>

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		<p>believe that the Digital Decade cannot be achieved without all citizens acquiring the necessary digital skills.</p> <p>We believe it is essential to envisage greater synergies between the various European initiatives such as the Union of Skills' "2030 Roadmap on the future of digital education and skills" and "the STEM Education Strategic Plan".</p>
RECALLING		
<p>– The Decision of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme,</p>		
<p>– The European Economic Security Strategy of 20 June 2023,</p>		

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– 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		

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– 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]		
		We suggest to add a reference to the declaration on digital rights and principles.
BUILDING ON		
– The Council Conclusions of 21 May 2024 on “The Future of EU Digital Policy”,		

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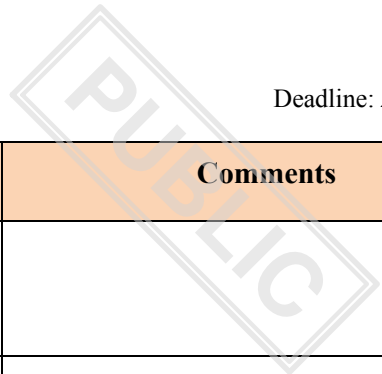
Presidency text	Drafting suggestions	Comments
– The Council Conclusions of 6 December 2024 on the Commission White Paper “How to master Europe’s digital infrastructure needs”,		
– The Council Conclusions of 6 June 2025 on reliable and resilient connectivity,		
– [The Council Conclusions of [20 October] 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		

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objective, critical to fostering innovation, productivity, welfare and sustainable growth across the EU.		
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.	NOTES with concern that the <i>2025 State of the Digital Decade</i> report and country assessments indicate that the EU is not <u>fully</u> on track to meet <u>part of</u> its 2030 targets, particularly in areas vital to digital competitiveness such as AI uptake, <u>digital skills</u> and SME digitalisation.	“is not on track to meet its 2030 targets” : this seems to be a bit black and white. Some nuance would be welcome (for some indicators we are well on our way to reach the targets)– only focussing on AI & SMEs digitalisation, digital skills -> also important in light of competitiveness
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	UNDERLINES the importance of maintaining the DDPP’s ambition and coherence, while	

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coherence, while updating it in a targeted and evidence-based manner to ensure its continued relevance.	updating it in a targeted and evidence-based <u>empirical</u> 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.	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, <u>resilience</u> , sovereignty and economic security <u>in the most sustainable and inclusive way, thus safeguarding our European values</u> .	



Presidency text	Drafting suggestions	Comments
Digitalisation and AI as key drivers for competitiveness	Digitalisation, <u>data</u> and AI as key drivers for competitiveness	Possibly adding a paragraph and the need for a comprehensive data strategy + could mention a paragraph on sandboxes as well as a concrete tool to be developed at EU level or add sandboxes under innovation further down in the text
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.	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 <u>across the board (governments, businesses and citizens) to access</u> , develop, adopt and govern such technologies and their underlying infrastructure. <u>STRESSES that the adoption of these technologies by all citizens of all ages requires massive support for the development and updating of basic and advanced digital skills.</u>	

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<p>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.</p>		
<p>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.</p>		<p>Implementing the numerous legislative acts adopted or proposed by the Commission already represents a considerable challenge for Member States. This requires significant resources, in a context of a widespread shortage of specialized talent. Introducing new rules or changing timetables mid-stream creates instability that complicates the prioritization of actions. Simplification is therefore welcome, but it would be desirable to limit new legislative initiatives to allow Member States to focus fully on achieving existing objectives.</p>

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Effective, simplified and coordinated digital regulation	Effective, <u>efficient</u>, 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 compliance costs for businesses, in particular SMEs, while ensuring the protection of consumers and citizens across the single market and beyond, <u>and while fostering competition in the market.</u>	Justification: to highlight that one of the objectives of digital regulation is to foster competition in the market.
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 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.	COMMITS 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 – <u>where appropriate and justified, maintaining the effectiveness and enforceability of policies.</u>	Justification: Paraphrasing the Commission paper "A Simpler and Faster Europe" 'simplification' is meant as a comprehensive effort to make EU legislation and the regulatory framework easier to understand, implement, and comply with, while maintaining the effectiveness of policies. Based on the above definition, it is clear that simplification does not mean deregulation, but rather making

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		<p>implementation and compliance easier and more efficient while preserving the EU's policy goals and ambitions, in areas such as economic policy, competition policy, consumer protection, environmental policy and in relation to societal goals.</p> <p>We should be mindful that the “simplification mantra” can be used inadvertently to argue for ‘deregulation’, where this isn’t appropriate or justified and would be contrary to the objectives pursued by the EU.</p>
<p>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.</p>		<p>We could add a paragraph on the importance of legal certainty for businesses the gradual implementation of the various digital instruments and the fact that we need better coordination of our common communication on some of these issues (ex. AI Act) - The content of this paragraph remains unclear. Could you</p>

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		clarify what is expected of Member States in this regard?
<p>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 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>CALLS FOR more structured and proactive dialogue between relevant enforcement authorities and EU institutions, including through joint guidance and better alignment of definitions, <u>governance bodies</u> and regulatory frameworks, as well as efforts to explore shared supervision models and interoperable national infrastructures where relevant.</p>	<p><i>full and coherent implementation and application of newly adopted rules</i> : Preferably synergies as well, especially in relation to the governing structures (ex. Discussion on EDIB)</p>

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<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 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>STRESSES that well-designed and developed 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.</p>	<p>‘INVITES the Commission to set concrete, measurable objectives for administrative burden’: any examples?</p>

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<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 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>, CALLS FOR a mainstreamed <u>streamlined</u> 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>CALLS FOR a mainstreamed use: what does it mean?</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</p>		<p>‘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</p>

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<p>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>		<p>not be at the cost of consistent monitoring' : Important. Newly adopted measures (certainly in terms of digital skills) are not expected to bear fruit immediately.</p> <p>The Commission must also take into account that recommendations may be useful, but not that they will be translated into specific measures and policies within a few months.</p> <p>However, it is indeed very useful to know the numerical progress annually, which is why it is a pity that not all KPIs have an annual measurement. - In countries with a federal state structure, all parts of the country should be included in the report and discussed in an equal manner.</p>
<p>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</p>		

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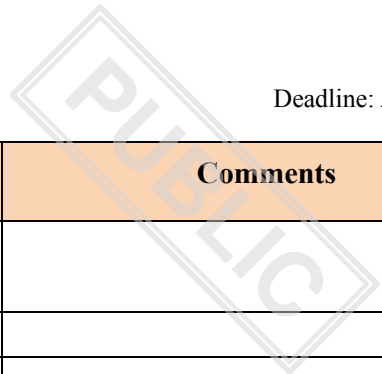
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digital policy ¹ . INVITES the Commission and Member States to further develop this strategic role by strengthening the Board’s capacity to support coherent implementation, foster coordination with other governance bodies established under the digital 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>Missing reference to the importance of semicon (perhaps with referral to the new upcoming review of the chips act) + data, AI (factories; antennas & gigafactories) & quantum? – Add a paragraph on sandboxes here given reference to regulatory agility.</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</p>		

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have this ambition reflected in the DDPP, including in its monitoring mechanism.		
18. [WELCOMES the Commission’s Apply 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.	HIGHLIGHTS the relevance of ensuring access to computing capacity among the DDPP targets.	‘HIGHLIGHTS the relevance of ensuring access to computing capacity among the DDPP targets’: Too vague and wouldn’t throw this (computer capacity) together with edge nodes. Mentioning “computer capacity” would be more useful in the context of AI and data storage/processing.



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Reinforcing digital sovereignty		It would be good to have a clear definition on 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 integrated in the DDPP review.</p>		

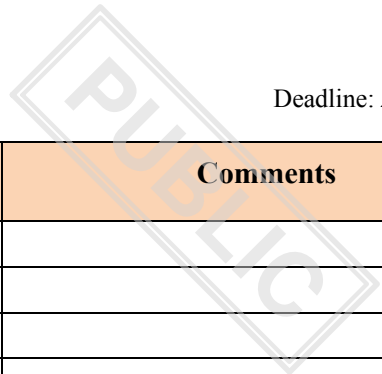
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<p>22. RECOGNISES the importance of strengthening Europe’s data infrastructure as an enabler for the development and deployment of advanced digital technologies such as AI.</p> <p>RECOMMENDS maintaining a high level of ambition in the development and deployment of sustainable digital infrastructure, in particular as part of the forthcoming DDPP review.</p>	<p>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>This paragraph should be elaborated further given the important role of data infrastructure in technologies such as AI, quantum.</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>this paragraph requires further internal discussion</p>
<p>i. the processing time for permitting digital infrastructure projects in the EU,</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 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>		

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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 policy relevance, feasibility of monitoring, availability of data and overall administrative burden.</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>		



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