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LIMITE

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Telecommunications and Information Society
Subject:	Draft Council Conclusions on European Competitiveness in the digital decade (ST 12911/25) - DE comments

Delegations will find in the annex the DE comments on the Draft Council Conclusions on European Competitiveness in the digital decade (ST 12911/25) .

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**). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

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
General Comments		
EUROPEAN COMPETITIVENESS IN THE DIGITAL DECADE		
THE COUNCIL OF THE EUROPEAN UNION,		
RECALLING		
<ul style="list-style-type: none"> – The Decision of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme, 		

Presidency text	Drafting suggestions	Comments
<ul style="list-style-type: none"> - The European Declaration of 23 January 2023 on ‘Digital Rights and Principles for the Digital Decade’, 		
<ul style="list-style-type: none"> - The Joint Communication from the Commission of 20 June 2023 on ‘European Economic Security Strategy’ of 20 June 2023, 		
<ul style="list-style-type: none"> - The Niinistö Report of 20 March 2024 ‘Safer together: A path towards a fully prepared Union’, 		
<ul style="list-style-type: none"> - The Letta Report of 17 April 2024 ‘Much more than a market: Speed, Security, Solidarity’, 		
<ul style="list-style-type: none"> - The European Council Conclusions of 18 April 2024 on ‘A New European Competitiveness Deal’, 		
<ul style="list-style-type: none"> - The Council Conclusions of 24 May 2024 on ‘A competitive European industry driving our green, digital and resilient future’, 		

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<ul style="list-style-type: none"> — The Niinistö Report “Safer together: A path towards a fully prepared Union”, 20 March 2024, 		
<ul style="list-style-type: none"> — The Letta Report “Much more than a market: Speed, Security, Solidarity”, 17 April 2024, 		
<ul style="list-style-type: none"> – The Draghi Report of 9 September 2024 “The future of European competitiveness”, 9 September 2024, 		
<ul style="list-style-type: none"> – The Communication from the Commission of 29 January 2025 ‘A Competitiveness Compass for the EU’ adopted by the Commission on 29 January 2025, 		
<ul style="list-style-type: none"> – <u>The Communication from the Commission of 5 March 2025 on ‘the Union of Skills’</u> 		
<ul style="list-style-type: none"> – <u>The Communication from the Commission of 5 March 2025 on ‘the Action Plan on Basic Skills’</u> 		
<ul style="list-style-type: none"> – <u>The Communication from the Commission of 5 March 2025 on ‘A STEM Education</u> 		

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<u>Strategic Plan: skills for competitiveness and innovation?</u>		
– The Communication from the Commission of 9 April 2025 on ‘AI Continent Action plan’,		
– The Communication from the Commission of 28 May 2025 on ‘The EU Startup and Scaleup Strategy – Choose Europe to start and scale’,		
– The Joint Communication from the Commission and the High Representative of 4 June 2025 on ‘An International Digital Strategy for the European Union’ of 4 June 2025,		
– The report from the Commission of 16 June 2025 ‘State of the Digital Decade 2025’ adopted by the Commission on 16 June 2025,		
– [The Communication from the Commission of [XX] 2025 on the a Apply AI Strategy,]		

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<p>[The Communication from the Commission of [XX] 2025 on a Data Union.]</p>		
BUILDING ON		
<ul style="list-style-type: none"> - The Council Conclusions of 21 May 2024 on “The Future of EU Digital Policy”, 		
<ul style="list-style-type: none"> - The Council Conclusions of 6 December 2024 on the Commission White Paper “How to Master Europe’s Digital Infrastructure Needs?”, 		
<ul style="list-style-type: none"> - The Council Conclusions of 6 June 2025 on ‘Reliable and Resilient Connectivity’, 		
<ul style="list-style-type: none"> - [The Council Conclusions of [20 October] 2025 on ‘Advancing an International Digital Strategy’.] 		
<p>I. Strengthening European Competitiveness with the Digital Decade as a strategic compass for a sovereign digital transformation</p>		

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<p>1. STRESSES that strengthening the EU’s global digital competitiveness while safeguarding fundamental rights and EU values is a core strategic objective, critical to fostering innovation, productivity, welfare and prosperity, sustainable growth and economic security across the EU.</p>		
<p>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 fully meet all of its 2030 targets, particularly in areas vital to digital competitiveness such as AI uptake, and SME digitalisation and digital skills. STRESSES the need for accelerated and aligned initiatives and efforts at both EU, and national and regional levels to address this shortfall, while UNDERLINING the importance of taking national circumstances and changing technological environments into account.</p>		
<p>3. REITERATES that the Digital Decade Policy Programme (DDPP) serves as the EU’s strategic compass for navigating and investing in the digital transformation and building long-term digital competitiveness and sovereignty in an open manner.</p>		
<p>4. UNDERLINES the importance of maintaining the DDPP’s ambition and coherence, while updating it in a targeted and evidence-based</p>		

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<p>manner to ensure its continued relevance <u>and effectiveness</u>.</p>		
<p>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, <u>digital</u> sovereignty <u>in an open manner</u> and economic security <u>in a sustainable and inclusive way, thus safeguarding fundamental rights and EU values</u>.</p>		
<p><u>5a. RECOGNISES that the achievement of the Digital Decade targets relies on an effective, coordinated and strategic use of relevant EU policies and programmes, within the existing Multiannual Financial Framework (MFF), including inter alia, the Cohesion Policy, Horizon Europe and Digital Europe programmes, and the Connecting Europe Facility – Digital (CEF Digital).</u></p>		
<p><u>5ab. NOTES the prominent role of digital transformation, including the DDPP, in the Commission’s proposal of 16 July 2025 for the post-2027 Multiannual Financial Framework (MFF), notably through the proposed European Competitiveness Fund and the National and Regional Partnership Plans.</u></p>		

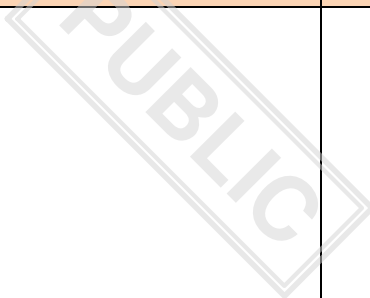
Presidency text	Drafting suggestions	Comments
II. Digitalisation, <u>data</u> and AI as key drivers for competitiveness		
<p>6. EMPHASISES the central role that the development and uptake of digital technologies, digital skills and talent play in enhancing the EU's competitiveness and digital sovereignty in an open manner, and STRESSES the urgent need to strengthen the EU's capacity to understand, access, develop, manage and, responsibly adopt and govern such technologies and their underlying infrastructure.</p>		
<p>7. RECOGNISES the importance of building on the EU's competitive strengths and removing remaining unnecessary barriers in the digital single market as the foundation for accelerating digital innovation, development and uptake.</p>		
<p>8. <u>STRESSES that AI is a key driver of productivity, innovation and quality public services across the EU.</u> 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 ensuring access to services and solutions across the EU,</p>		

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<p>including by developing and deploying AI Factories, Antennas, and AI Gigafactories and European Digital Innovation Hubs, and by cultivating, attracting and retaining AI talent, <u>UNDERLINES</u> and ensure the <u>need for consistent implementation of a regulatory framework that supports innovation and scalability within the single market, while maintaining a high level of protection of health, safety and fundamental rights, as well as respecting rights of third parties, such as intellectual property rights.</u></p>		
<p><u>8a. RECALLS that the EU’s global digital competitiveness, digital transformation and AI leadership depend on structured access to high-quality data. In this context, STRESSES the importance of open standards, interoperability solutions and open-source software.</u></p>		
<p>III. An Effective, simplified and coordinated digital regulation regulatory framework</p>		
<p>9. EMPHASISES the importance of ensuring that digital regulation is a simple, clear, proportionate and predictable regulatory framework for digital and data-driven societies; in order to reduce <u>and avoid</u> unnecessary barriers, complexity and compliance costs for businesses, in</p>		

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<p>particular SMEs; to give certainty, enable competition and innovation, while ensuring the a high level of protection of consumers and citizens, across the single market and beyond <u>including for consumers</u>, and building trust in new technologies.</p>		
<p>10. [WELCOMES / LOOKS FORWARD TO (depends on the timing)] NOTES the importance of the Digital Package by the Commission, and RECOGNISES its ambition to reduce unnecessary 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 and streamlining regulation, including reporting obligations, and facilitating seamless administration and effective enforcement to achieve for a competitive single market, while maintaining the key objectives of the digital acquis.</p>		
<p>11. URGES ADVOCATES FOR the systematic use of stress-tests of the digital acquis with a strong focus on competitiveness, simplification, coherence and enforcement feasibility. In this context, STRESSES the importance of <u>impact assessments, digital-ready policymaking</u> and the Commission’s consistent</p>		

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<p>use of interoperability assessments and the resulting Digital Statements digital statements, in order to clearly communicate digital implications impact and support more efficient implementation of new EU legislation.</p>		
<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 and relevant stakeholders; CALLS FOR more structured and proactive dialogue between relevant enforcement authorities and EU institutions, including through formal structured forms of cooperation mechanisms that to support consistency consistent and predictability predictable of implementation and application. This may be achieved through with joint guidance on the application of the newly adopted rules and better alignment of definitions, governance bodies and regulatory frameworks, as well as efforts to explore possibilities for shared supervision models and digital tools, including interoperable national infrastructures, could also be explored where relevant, involving political and strategic direction from the Member States where appropriate.</p>		

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<p>13. STRESSES that well-designed digital tools, such as the European Digital Identity Wallets and the forthcoming European Business Wallets, can should be well-designed and can play a key role in strengthening the EU’s competitiveness by reducing administrative burdens and regional disparities, and by improving the user experience including for businesses and public administrations alike. STRESSES that such tools should be developed <u>considering comparable state-of-the-art digital solutions with proven use in the Member States and</u> 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 and that ensures interoperability. INVITES the Commission to set concrete, measurable objectives for administrative burden reduction through digitalisation, in particular in the context of the DDPP review harness the full potential of digital tools in its efforts to reach the 25% burden reduction target for all companies and 35% for SMEs set out in the Competitiveness Compass, and to monitor and report, where possible, on their contribution to these reductions.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-15deg);">PUBLIC</p>	
<p>14. ENCOURAGES Member States to – in step with the timely adoption of implementing and delegated acts – implement and enhance promote</p>		

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<p>the uptake of the EU European Digital Identity Wallets, ensuring citizens and residents can access services in a safe, reliable, trusted and privacy-preserving manner. UNDERLINES the importance of applying a “wallet-by-default” principle approach where and when appropriate in upcoming as well as existing EU legislation, with a view to empowering citizens, streamlineing digital solutions, avoiding fragmentation, and promoteing interoperability and fully realise the Wallets’ potential across borders. In this context, CALLS FOR a mainstreamed use fully realising the potential of the upcoming European Business Wallets, and for mainstreaming the use of wallets as well as the Digital Product Passport and eInvoicing and other already established digital tools, recognising their potential in order to simplify and digitalise business-to-government and business-to-business interactions.</p>		
<p>15. Furthermore, UNDERLINES the need for simpler, more transparent 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 reduce duplication in reporting requirements as well as to explore the possibility to decrease the frequency of publication of full</p>		

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country reports, including recommendations , 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.		
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 ENCOURAGES 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.		
IV. Fostering innovation and uptake of digital technologies		
17. ACKNOWLEDGES that long-term European competitiveness depends on a dynamic, innovation-driven digital economy, and STRESSES, in line with the EU Startup and Scaleup Strategy , the importance of improving		

¹ Cf. Commission Decision C(2022) 7141.

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framework conditions for the development, testing, scaling and uptake of sustainable digital technologies across all sectors.		
<p>17a. 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, innovation, commercialisation and growth. HIGHLIGHTS the need to effectively bolster the full “research-to-market” pathway in full for digital technologies and to have this ambition more accurately reflected in the DDPP, including in its monitoring mechanism.</p>		
<p>18. [WELCOMES the Commission’s Apply AI Strategy (to be developed later).]</p>		
<p>19. [WELCOMES the Commission’s Data Union Strategy, (to be developed later).]</p>		
<p><u>19a. ENCOURAGES continued cooperation between Member States and the Commission on the development of joint digital infrastructure services and pooling of resources required for effective implementation.</u></p>		

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<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>V. Reinforcing digital sovereignty in an open manner</p>		
<p>21. UNDERLINES the importance of strengthening the EU’s digital sovereignty <u>in an open manner</u> and economic security through a coherent, bold, effective, open, risk- and evidence-based strategic approach. STRESSES that this requires mobilising investments and mitigating strategic dependencies, as well as close cooperation with the business sector, investors, researchers and international partners, including the mobilisation of private capital and expertise, to ensure diversified, secure and trusted digital supply chains. RECOGNISES that the development of critical digital technologies, including those with dual-use potential, are <u>often interdependent and mutually reinforcing, and that a holistic approach is therefore needed.</u></p>		

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<p>21a. SUPPORTS greater European EU capacity and leadership in development and adoption of critical digital technologies, while stressing STRESSES that digital sovereignty equally relies on a strong and well-functioning single market with fair competition, clear, innovation-friendly rules and better framework conditions for growth, – including simpler, more proportionate and predictable regulation and – underpinned by UNDERLINES that this depends on open strategic global collaboration, trade and investment to ensure openness and diversified, secure and trusted resilient digital supply chains. CONSIDERS that such a balanced approach could be integrated in the DDPP review In this context, EMPHASISES the importance of a common understanding of the fundamental principles of digital sovereignty and its implications for competitiveness.</p>	<p>(...) <u>UNDERLINES that this depends on open strategic global collaboration, trade and investment to ensure openness and diversified, secure, trusted and trusted resilient digital supply chains. (...)</u></p>	<p><u>GER suggests that it must be spoken of secure and trusted and resilient digital supply chains, see also above section 21.</u></p>
<p>21b. Therefore CONSIDERS that such a balanced approach to digital sovereignty in an open manner could be integrated in the DDPP review. To this end, INVITES the Commission to consider reflecting the following elements in the DDPP, with particular attention to key digital technologies areas such as semiconductors, quantum, cloud, AI, cybersecurity and connectivity:</p>		

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<p>i. facilitating development of and access to critical digital infrastructure capacities in the EU,</p>		
<p>ii. enhancing transparency, interoperability and competition, while reducing vendor lock-in and reliance on single providers, including through open-source and modular solutions, <u>in particular for cloud and AI,</u></p>		
<p>iii. strengthening access to and uptake of advanced digital skills, <u>in particular among women,</u> to secure <u>and maintain the a diverse talent pool in the EU</u> needed to develop, deploy and harness key digital technologies,</p>		
<p>iv. supporting <u>research, innovation, development and deployment</u> to increase the <u>demand for</u> and market share of EU suppliers, thereby reducing strategic dependencies, including through the <u>strategie targeted</u> use of public procurement.</p>		
<p><u>UNDERLINES that the review could represent an opportunity to assess the design and</u></p>		

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<p><u>implementation of European Digital Infrastructure Consortia in support of the abovementioned elements.</u></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 sustainable digital infrastructure, in particular as part of the forthcoming DDPP review.</p>		
<p>HIGHLIGHTS that energy and resource efficient sustainable digital technologies contribute to <u>our climate action while also improving our resilience and digital sovereignty in an open manner through energy, water and resource efficiency</u>, and RECALLS the invitation to the Commission to add a target related to a greener digital transition and to incentivise the deployment of innovative <u>sustainable technologies to the benefit of climate action in the review of the DDPP.</u></p>		
<p>23. In this regard, LOOKS FORWARD to <u>a proposal on</u> the forthcoming EU Cloud and AI Development Act, which has the potential to become as a key initiative to enhance access to data centres and compute <u>cloud capacities capacity</u> in</p>		

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<p>Europe the EU and foster a more diverse and competitive cloud landscape, including for SMEs both as users and providers. In this context, CALLS for a common <u>understanding of the fundamental principles of digital sovereignty definition of sovereignty for cloud services, addressing in particular security guarantees against extraterritorial legislation adopted by third countries.</u></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>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</p>		

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<p>providers, or the proportion of organisations switching cloud providers over a defined period.</p>		
<p>VI. Next steps</p>		
<p>25. In line with the “one in, one out” principle, ENCOURAGES the Commission to carefully assess whether some of the existing DDPP targets reflect technological, geopolitical, or market realities – such as on edge nodes – and could be <u>adjusted, withdrawn or replaced by —or integrated with— new targets, such as the proposals set out like those suggested following the political direction given</u> in these Council Conclusions, considering their policy relevance, feasibility of monitoring, availability of data and overall administrative burden. <u>UNDERLINES that any new or revised targets should be based on a user perspective and technology neutrality.</u> STRESSES that targets should be concrete and possible to implement in a simple, <u>resource-efficient</u> and transparent manner.</p>	<p>25. In line with the “one in, one out” principle, ENCOURAGES the Commission to carefully assess whether some of the existing DDPP targets reflect technological, geopolitical, or market realities – such as on edge nodes – and could be <u>adjusted, withdrawn or replaced by —or integrated with— new targets, such as the proposals set out like those suggested following the political direction given</u> in these Council Conclusions, considering their policy relevance, feasibility of monitoring, availability of data and <u>reducing the</u> overall administrative burden.[...]</p>	<p><u>As previously mentioned with regard to point 22, the annual cooperation cycle under the Digital Decade Policy Programme 2030 has created a very significant administrative burden for Member States. Germany therefore considers it essential that any adjustment to the DDPP aims at reducing the overall administrative burden.</u></p>
<p>25a. Furthermore, INVITES the Commission to continue its ambitious agenda to simplify the digital acquis, while ensuring that all new legislation, including implementing and</p>		

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<p>delegated acts, are simple, clear, proportionate, predictable and digital by default.</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>		