

**EU VOTE
FOR DIGITAL**
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**Digital Policy
for Europe 2024-2029**

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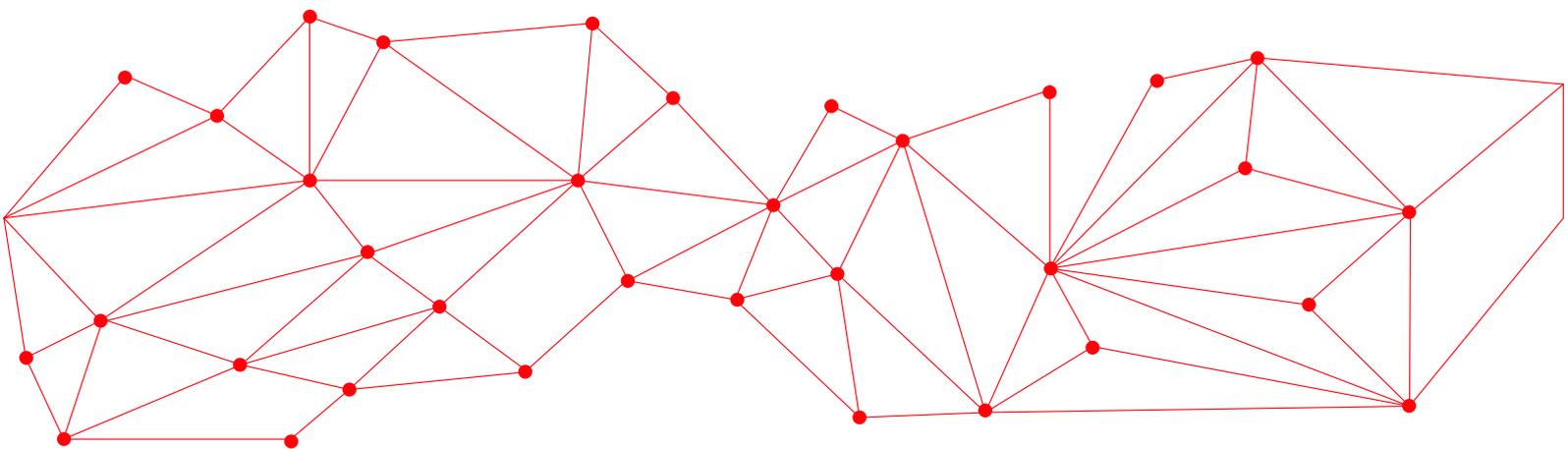
Foreword

Europe is facing major challenges. During the Covid-19 pandemic, European prosperity was jeopardised by global events, and it became clear that not only economic structures and institutions were exposed to vulnerability, but also societal structures. While comprehensive digitalisation can help make us more resilient and better equipped to handle crises, Europe's democracy and its values are nonetheless also at risk in geopolitical terms. Concrete threats, such as the Russian war of aggression against Ukraine, are juxtaposed with more abstract challenges, such as the erosion of democratic values and growing fears of wealth loss. The upcoming legislative term from 2024-2029 must therefore be put to use to give Europe impetus, to strengthen the Single Market, to modernise and digitalise the institutions of the EU and its Member States, and to improve the EU's resilience.

At present, we are experiencing political and economic challenges. Rising interest rates, weakening economic growth, faltering investments, geopolitical tensions and

increasing inflation are weighing on Member States and impacting the development of the EU economy. In recent years, legislative activities at the European level have increasingly been perceived as overregulation. The competitiveness of the European economy must become a greater priority for the future Commission. Clear impetus must be provided for a future-proof and, above all, a future-oriented Europe. The EU needs to set a positive signal for the economy and maintain a regular dialogue with local stakeholders. This should include reducing burdens, especially for SMEs in Europe. Furthermore, the increasing complexity of the EU legal framework and the depth of regulation and compliance with the regulations constitute a rising cost factor for companies in the Single Market. For SMEs, in particular, this is an obstacle to digitalisation and prevents the cross-sectoral use of digital technologies.

Framework conditions must be established to enhance the competitiveness of the European Union in global compe-

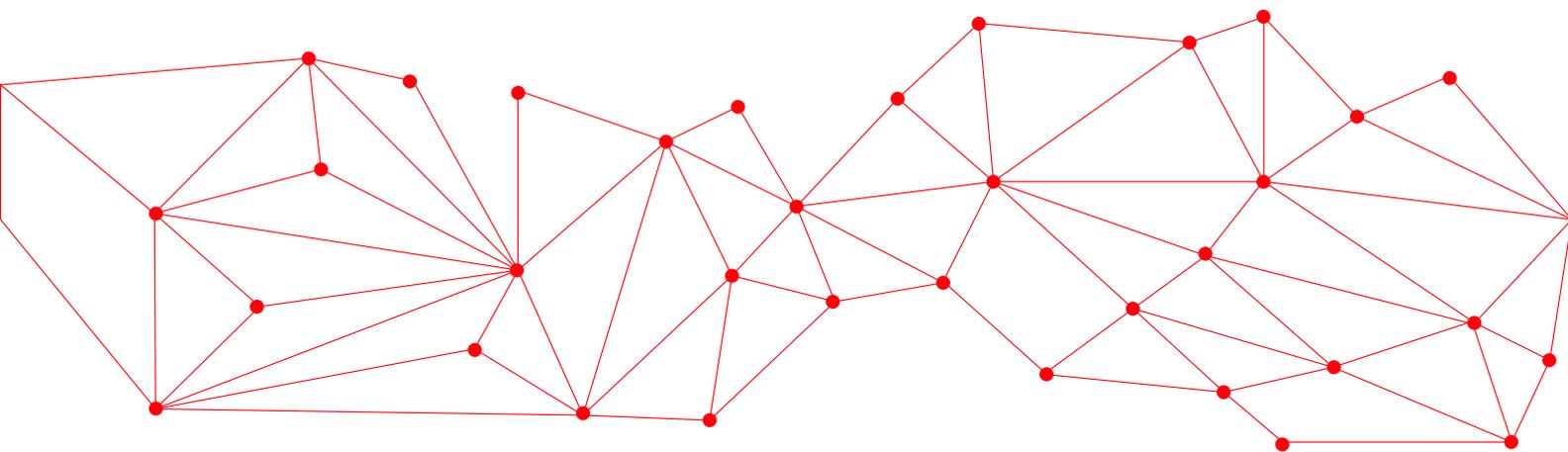


tion. Technological innovation and digital technologies are crucial factors for sustainable economic development. Investments in digital transformation increase R&D funding, and it is imperative to have simplified and less bureaucratic access to national and European funding. Structural change and digital transformation require investment. In particular, support for SMEs must be strengthened. The Single Market must be expanded into a European digital ecosystem. This requires standardised framework conditions in Europe and the promotion of interoperability and the exchange of industrial data in order to exploit the potential of data for value creation. For this to succeed, public databases must be made accessible on a large scale. Interoperability, open digital ecosystems and standards are essential building blocks in this regard.

Achieving the climate goals and the decarbonisation of European industry will not be possible without the use of digital technologies. The dual transformation and accele-

ration of the digital and green transitions require coherent and consistent political initiatives at the EU and Member States level.

The EU must protect itself against geopolitical risks and guarantee its autonomy and sovereignty while pursuing an open approach to its digital sovereignty, promoting open markets and innovation, and strengthening cooperation with allied countries. In order to prevent global fragmentation and divergence of rules in the digital space, the EU must not only strengthen its own competitiveness and competences, but also rely on partnerships with democratic countries within and outside Europe – for example, within the G7 or the OECD. This includes, above all, deepening transatlantic cooperation. The framework conditions for cybersecurity must be designed in such a way that they contribute to strengthening IT security and resilience, enabling citizens, businesses and the state to benefit from globally leading standards, security measures and services.



1. Further development of innovation and competition in Europe

The independent, interoperable, open and decentralised structure of the Internet is the foundation for the success of our technology. It is a prerequisite for fair, equal and democratic participation and involvement for all. This foundation must be preserved. The Internet can only function if it is not dominated by individual players or governments. The architecture of the Internet has changed fundamentally in recent years. At the same time, we are currently experiencing new cross-cutting technologies such as artificial intelligence, 5+G, Network Slicing and OpenRAN, and the development of new high-performance computers, which are placing the previous premises of the European economy on a new footing. It is crucial that the focus is on openness and competition and

that the European business location does not fall behind. Care should also be taken to ensure that the framework conditions for this competition are appropriate and fair and that interventions in the market are based on sensible legal grounds or technical requirements and only after a careful, proportionate analysis of all risks. In order to drive innovation in the digital sector, companies must be able to compete fairly and openly. Ultimately, this also gives citizens better and broader access to different services and offers. Finally, European competitiveness should also be flanked by a stronger long-term orientation in competition law. In this context, it is important that dynamic innovation and investment effects are given more weight in the assessment under competition law.

1.1. Boosting European competitiveness

The competitiveness of the European economy should be emphasised in the upcoming legislative term of the European Parliament. To achieve this, it is necessary to reduce bureaucracy through EU regulation. In the field of digital policy, there have been regulatory initiatives in recent years that were associated with additional administrative efforts among other aspects, and whose impact on the digital economy cannot yet be definitively assessed. These include, for example, the Digital Services Act, the Digital Markets Act, the Data Act, the AI Act and the NIS2 Directive. Further regulatory projects for the digital economy must therefore be scrutinised and thoroughly examined to determine their necessity. The impact assessments for all new European regulations should factor how they can be harmonised with other technical regulatory forums and initiatives. The new

Commission should endeavour to simplify and consolidate legislation, which is already in force. Existing regulations should be critically scrutinised with a view to making their application as straightforward as possible and to avoid overlapping regulation. The new Commission must focus on promoting competition and innovation and improving competitiveness and location factors. In this context, consideration must also be given to tightening the current bureaucracy brake to a "one in, two out" clause. At the very least, existing regulations for reducing bureaucratic overheads must be implemented on a more consistent level. In addition, better conditions must be created for start-ups, who often do not find adequate funding opportunities in the EU. The transfer between business and science must be promoted so that start-ups are easier to set up.

1.2. Establishing modern technologies in the European market

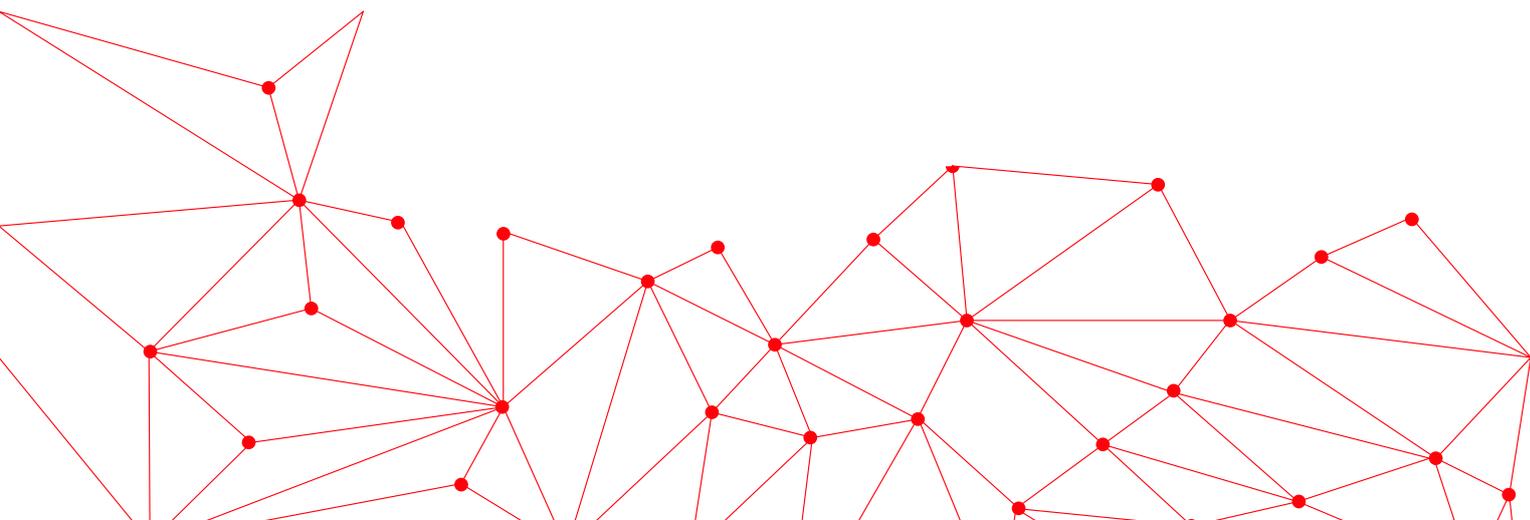
European providers are facing pressure from their international competitors when it comes to products and applications for the mass market, as well as cloud computing and future-oriented cross-sectional technologies such as artificial intelligence. European regulation, such as the AI Act, sometimes creates uncertainty with regard to the possible uses of digital technologies and a reluctance to invest. Digital technologies, especially sovereign digital technologies in the context of technological sovereignty, should be established on the market through supportive and incentivising measu-

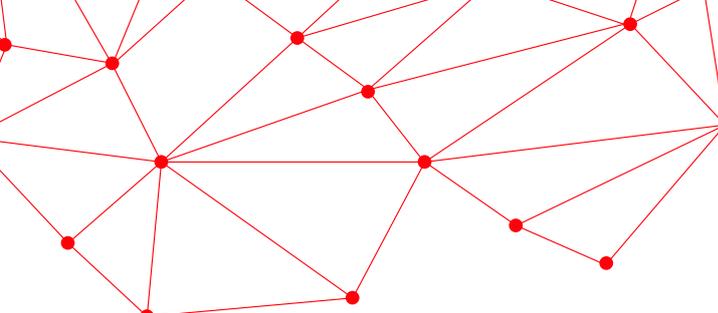
res. The upcoming Commission should critically examine whether and how detailed ex-ante regulation needs to be, where a more level playing field is needed, and where competition law and a risk-based approach make sense. Special care should be taken in particular innovation-driven areas such as the environmental sector, the circular economy and new virtual technologies. In any initiatives to implement new technologies in the European market, their trustworthiness should be a central factor. The technologies should meet the high requirements set by European laws and regulations.

1.3. Simplifying data usage

With the Data Act and the Data Governance Act, the EU has created the foundation for better data availability. Nevertheless, the EU is still far from its goal of raising its share of the global data economy. The potential for value creation, research and societal benefit based on data usage must be realised and supported where necessary. In addition to the standardised application of the GDPR, this requires practicable and legally compliant rules for handling (non-)personal

data that promote data-driven business models and the use of the most efficient digital technologies. Investments in the use and digitalisation of existing data sets should be more broadly promoted, while existing data laws should be examined for practicality to both ensure greater legal certainty and to simplify data handling for business and science. In this context, further agreements for data exchange with third countries are also required.





2. Sovereign use and development of technology

In times of growing global tensions and challenges in systemic competition, as well as intensifying global competition – especially in the digital economy, where new cross-sectional technologies radically reshape markets – the question arises as to how Europe can act successfully in this environment in the future while also maintaining open markets and promoting international cooperation. In addition to traditional topics in the area of competition and economic

policy, technology assessment and its interactions with the aforementioned areas are now also included. It can only be ensured that European companies will be successful in the market and that prosperity and value creation will not shift to other regions of the world if viable and trusted solutions accepted by both industry and society are found for the use of key technologies such as artificial intelligence or cloud computing.

2.1. Recognising artificial intelligence as an opportunity for Europe

The EU must become a leading innovation zone in the field of artificial intelligence. This requires innovation-friendly regulation, targeted research funding and support for AI start-ups. The AI Act has created the European legal framework for the use of AI. In the next legislative term, it will be crucial to standardise the requirements for the economy as much as possible when implementing the AI Act. For a European Single Market for AI and a high degree of legal certainty for companies and users, the AI Regulation must be transposed uniformly across the Member States. Furthermore, providers of

AI systems and models must not be additionally encumbered with a reversal of the burden of proof in liability law. This could weaken Europe's position as an AI location in global comparison and encourage innovative developers to relocate. In the field of AI research, funding should be increased. Europe is currently well positioned in terms of academic research on AI and must continue to build on this advantage and make it more usable for the economy.

2.2. Establishing interoperable data spaces

Interoperable data spaces are a crucial factor in simplifying and promoting the sharing and exchange of data between different stakeholders. In its 2020 Data Strategy, the EU announced the creation of several sectoral data spaces. For example, the health data space and the data space for agriculture are currently under development. In contrast, the data space for industrial data is still at an early stage. Inter-

connected and interoperable data spaces must continue to be developed in order to realise the European Digital Single Market for data. The foundations for this have been laid in recent years and must be built upon in the next legislative term. In this endeavour, existing national structures and resources should be integrated as effectively as possible and supported where necessary.

2.3. Advancing standardisation in the Digital Single Market

Against the background of a constantly changing global economy and ever-increasing uncertainty, the EU should focus in the coming legislative term on promoting rapid and effective standardisation and norm-setting, as well as ensuring alignment with international standards. It would thereby promote planning security for businesses and consumers. Where necessary, regulatory approaches of a guideline nature should be favoured over small-scale detailed regulation. In this respect, equal treatment, interoperability and

coherence – also with international standards – should take centre stage. The new Commission should also ensure that European standards are harmonised with political partners. In this field, the EU must think and act globally and strive for the broadest possible international agreement on standardisation and norm-setting. The industry's leading role in establishing and developing standards is a decisive factor, particularly due to the special economic structures in Europe, and must be urgently supported.

2.4. Accelerating the adaptation of digital technologies

As part of the "Digital Decade", the use of digital technologies is set to increase significantly by 2030. There is room for improvement in all sectors of the economy. In this regard, the forthcoming Commission must pursue the achievement of these goals more proactively. In particular, there is room for improvement in the provision of digital skills and the adoption of digital technologies. According to the Commission, only 54% of SMEs in the EU have reached a "baseline level" in the use of digital technologies by 2023. The target for 2030 is 90%, although reaching this target earlier would

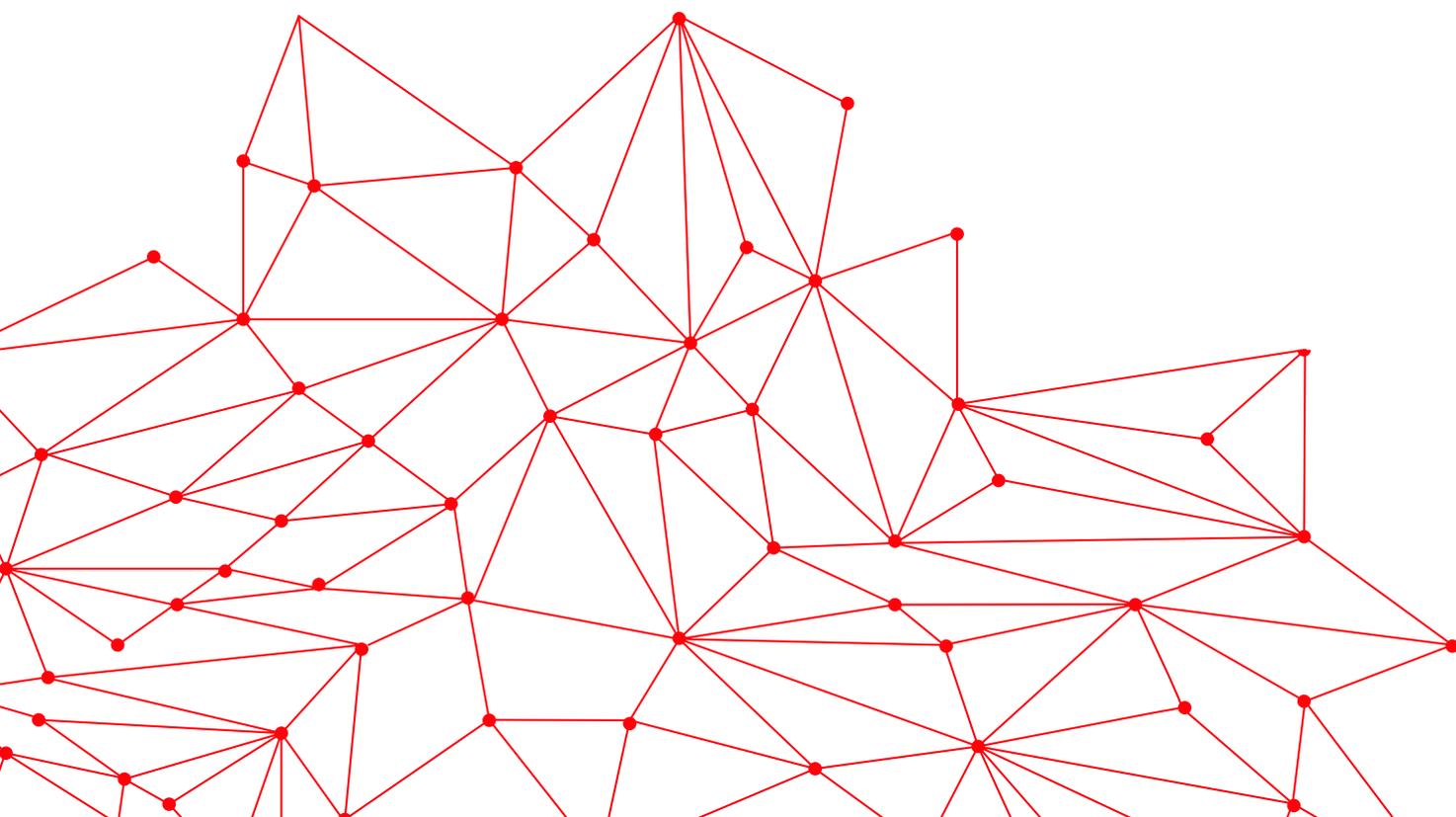
naturally be desirable. AI and cloud applications, in particular, are levers and driving forces for cross-sectoral digitalisation and are indispensable not only for the modernisation of the economy, but also for the EU institutions and the Member States. The introduction of cloud computing in the public sector is crucial for the digitalisation of administrative processes and the provision of citizen services. Achieving the goals of the "Digital Decade" must therefore be resolutely driven forward and prioritised by the new Commission and should also be supported where necessary.

3. Resilient extension of digital infrastructures in Europe

The European Union has set itself the goal of making Europe the most connected continent by 2030, with every European household having access to a gigabit connection. In order to achieve this ambitious goal, the political and regulatory framework conditions must be optimised. Furthermore, there is a need for action, given that high-performance digital infrastructures need to be available across the board in order for Europe to successfully address the global and ecological challenges of the coming decades through digitalisation. The availability of high-performance gigabit networks, gigabit-capable connections and state-of-the-art mobile networks of the latest generation is essential for cross-sector digitalisation and Europe's competitiveness. A functioning ecosystem of digital infrastructures also includes data centres, colocation providers, content delivery networks and cloud infrastructures, as well as reliable and high-performance Internet Exchange Points. These components form the backbone and foundation of digitalisation.

The availability of gigabit-capable Internet is an indispensable foundation for the social and economic participation of citizens, for maintaining competitiveness, and for driving innovation. A study commissioned by the European Commission anticipates that investments totalling 200 billion Euro will be required in order to achieve the connectivity goals of the Digital Decade. At the same time, the demands on telecommunications networks are increasing in order to enable the growing AI and data-driven business models of the future.

Furthermore, as the importance of digital infrastructures rises, the focus is placed on the infrastructures' security and resilience in times of crisis. The resilience of digital infrastructures has been a topic of discussion and contention among policymakers, businesses, and public administration for a long time, and will once again be on the agenda in the upcoming legislative term.



3.1. Maintaining the open, interoperable and decentralised structure of the Internet

Against the backdrop of economic developments and increasing geopolitical tensions, we are concerned about the emerging and increasing tendencies and endeavours of individual state governments that could lead to segmentation and fragmentation of the Internet. The independent, open and decentralised structure of the Internet is a fundamental prerequisite for fair, equal and democratic participation and involvement for all. Segmenting and fragmenting the Internet by abandoning the “any-to-any” principle, in which users

can share legal content with each other without restrictions, contradicts the global structure and jeopardises the worldwide accessibility and interoperability of networks and thus also the technical, organisational, competitive and economic viability of the Internet. The European institutions should endeavour to ensure that the relevant international bodies can make their decisions independently and on a technical basis. The proven multi-stakeholder principle should definitely be taken into account in this context.

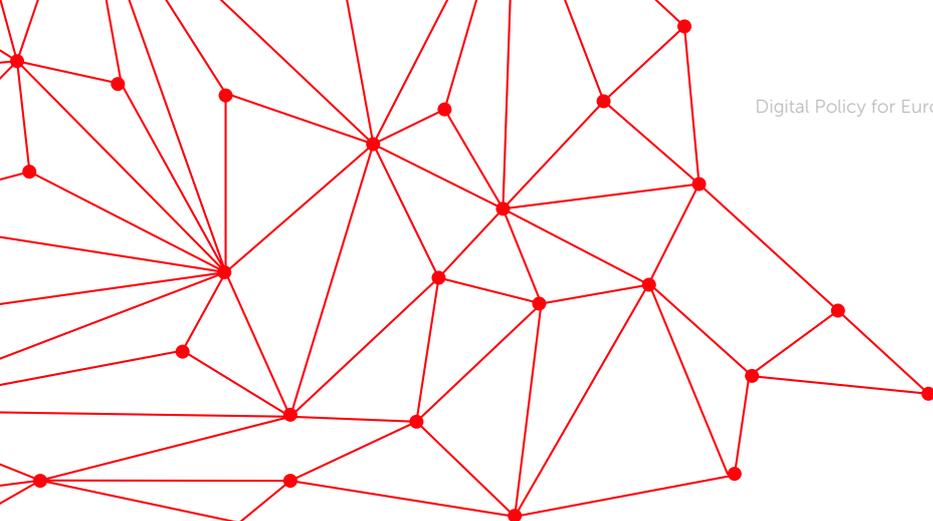
3.2. Promoting the accelerated expansion of self-sufficient networks in a targeted manner

Europe will only achieve the goals of the “Digital Decade” if the specificities of the national telecommunications markets are taken into account. The continuous promotion of competition in the telecommunications market must be a primary task in the coming legislative term. A diversified electronic communications sector that allows a large number of market participants to offer a variety of services and products is a prerequisite for unleashing the innovation potential resulting from the digitalisation of the EU economy. These aspects need to be further discussed in the upcoming legislative term, while all relevant stakeholders should be involved in the deliberations.

The nationwide expansion of gigabit-capable networks can often only be achieved through the interaction of private-sector expansion and state support. The expansion of gigabit-capable networks should primarily be realised via the private-sector expansion of the networks and supplemented by demand-driven and targeted subsidy measures. When expanding the networks, expected future developments, such as the connection to multi-gigabit-capable networks and digital infrastructures, should also be taken

into account. In order to drive forward the expansion of digital infrastructures, the necessary approval procedures need to be urgently accelerated, and the broadest possible list of permit-free construction work must be implemented. Alternative installation techniques for broadband expansion (such as microtrenching) must also be made possible, which will enable the rapid expansion of networks with fewer resources and without excessive bureaucracy. The Gigabit Infrastructure Act, which was agreed by the Council and the EU Parliament in February 2024, does not fully utilise the possibilities in this regard.

In addition, further incentives must be provided at the EU level for the expansion of fibre optics and mobile communications, especially those that strengthen competition in services and infrastructure. This is due to the fact that EU regulations have a crucial influence on the telecommunications markets in the Member States. The new EU Commission must create appropriate framework conditions that make it possible to take the individual market characteristics in the Member States into account and to foster competition.



3.3. Shaping network expansion and infrastructure migration in an innovation-friendly manner

The migration and transition from copper to fibre optic networks in the Member States should be designed in a way that is conducive to competition. In some European countries, the expansion of fibre optic networks is already well advanced – but progress varies greatly from country to country. The primary driver of migration towards fibre optic and 5G is infrastructure-based competition. This must be promoted and supported in Europe and at the Member State level. To achieve this, it is important to decisively advance with the expansion of the network with fibre optics and the development of new frequencies for mobile communication to all

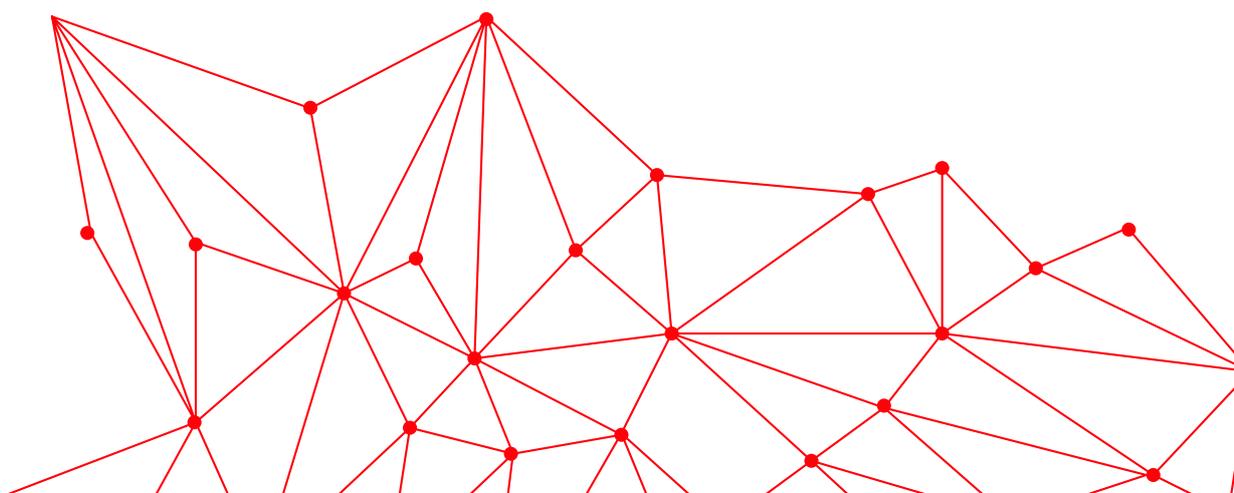
market participants in the mobile communications sector. Attention should already be focussed on the expansion of the next generation of mobile communications and 6G. In this context, lessons should be learned from the introduction of 5G, and industry and society should be included in the discussions and developments.

To achieve this, it is important to decisively advance network expansion with fibre optics and the allocation of new frequencies for mobile communication to all market participants in the mobile communications sector.

3.4. Maintaining net neutrality – establishing legal clarity

Net neutrality forms the foundation for the success of competition between services online and for open and fair access to these services. Value chains with digital components can only be successfully organised with universally accessible networks.

The open and free structure of the Internet should be preserved. At the same time, what should be examined is how the quality characteristics of services and service groups can be harmonised with the requirements of an open network in the course of advancing digitalisation and the development of new network structures.



3.5. Resiliently shaping TC networks and digital infrastructures

The new Commission must understand and accordingly prioritise high-performance digital infrastructures as a strategic element and backbone of cross-sectoral digitalisation and to ensure European sovereignty.

This needs to occur particularly regarding the requirements for improving resilience to a wide range of crisis and emergency scenarios – whether it is against the background of the changed geopolitical situation or from the point of view of securing supplies in the event of shortages. Given that telecommunications networks and digital infrastructures are of central importance to the economy and society, their integrity and

availability are vital. In addition to preparations for disasters, natural events and sabotage – for which regulation already exists in the form of the Critical Entities Resilience (CER) Directive – the handling of technologies and the use of components and elements are also at the centre of the debate on secure and trustworthy networks. In this scenario, there was also the first set of initiatives in the last legislative term against the backdrop of the discussion on ensuring the resilience of supply chains. There is an urgent need for further discussion on the design of European and international standards for companies that operate or expand networks – also in order to create investment and planning security and legal certainty.

3.6. Implementing existing rules for IT security

Especially in light of the increasing geopolitical threats, cybersecurity is of paramount importance for the resilience of European companies, and for critical infrastructures in particular. In recent years, the EU has created a large number of new regulations in the area of IT security in quick succession based on the NIS2 Directive, the Cybersecurity Act, the Cyber Resilience Act and the Cyber Solidarity Act. These regulations are set against the backdrop of a dynamic regulatory environment that has already been intensively addressed by the previous European Commission. From the perspective of the Internet industry, it would make sense for these regulations to be evaluated and checked for their effectiveness, practicability and potential contradictions before creating new regulations or replacing established regulatory schemes. While existing regulations are suitable

for enhancing better protection of the EU against threats from cyberspace, they also impose burdens on companies, both on the provider and user sides of digital products and services. In the interests of a European Single Market, the EU Commission should advocate for the most standardised application possible throughout the Member States. National “gold plating” should be avoided as far as possible and the affected stakeholders from business and administration should be involved in a timely and close manner – for instance, when discussing associated transposition acts (e.g. in the certification field) or developing joint guidelines and standards for the practical application of legal requirements (e.g. through the NIS Cooperation Group). In this process, new IT security strategies such as Zero Trust should be considered in order to minimise damage.

4. Promotion of the Internet with responsibility

As a global medium, the Internet has a long tradition of self-governance. Networks, their connections and communication standards are developed by independent bodies and used worldwide. The World Wide Web as we know it can only function if it can be operated securely and independent of political influence. Conversely, the operators of online

services have a responsibility to address legal violations if they become aware of them. The Digital Services Act also obliges the largest online platforms to fulfil additional security requirements. The obligations created by future regulation for individual players should take their role and capabilities in the digital world into account.

4.1. Deletion instead of blocking

The most effective approach to combatting absolutely illegal Internet content is “deletion” of the content at its original source (also known as “take-down”). In this process, hosting service providers remove or disconnect Internet content that they reliably recognise as illegal. A well-established method of awareness is the deletion request from complaints offices (also known internationally as hotlines), with which there is often close cooperation. This cooperation enables swift, unbureaucratic and efficient action. Conversely, when illegal content is blocked at the access level, the corresponding content remains online and is still accessible. In addition, network blocking often leads to

unintended collateral damage – for example, if websites or Internet services of uninvolved third parties are blocked, or content blocked in one jurisdiction is no longer available in the territories of other countries, even though there is no legal basis for blocking there.

The following principle enshrined in the DSA should be taken into account in further legislation: that action against illegal content on the Internet should be taken by those actors closest to the source of this content and who thus have the most suitable means of taking action against such content. These are usually hosting providers or online platforms.

4.2. Using synergies from hotlines, law enforcement and investigating authorities

When further developing the framework conditions for combatting illegal Internet content, it is essential to utilise synergies with existing structures and established players and to build on effective processes. An example here is the co-operation between hotlines, hosting services providers and law enforcement agencies. These long-standing collaborations have often been established as part of self-regulation and self-control. They have developed proven processes and procedures that enable the swift removal of illegal content

and the prosecution of the providers responsible for the criminal content (particularly uploaders or website owners). New processes should not counteract these efforts, but rather integrate and further develop, optimise and strengthen them on a case-by-case basis. This is not only relevant in the context of combatting sexualised violence against children and young people, but also relates to combatting illegal hate speech and, fundamentally, the area of youth media protection and the Digital Services Act.

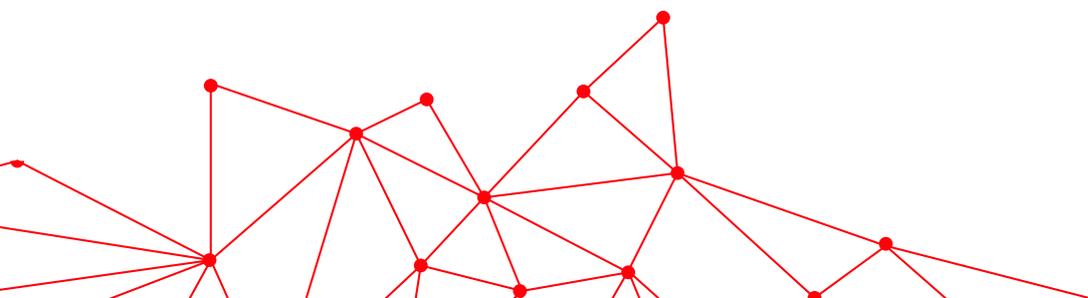
4.3. Sustainable promotion of hotlines

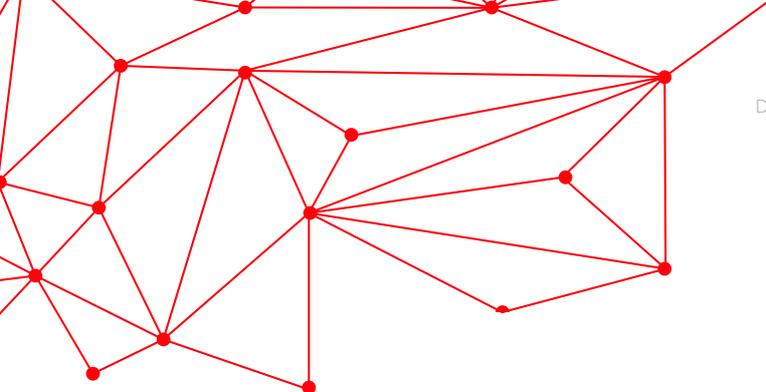
Hotlines are central points of contact and offer Internet users low threshold reporting options for potentially illegal Internet content, without requiring the reporters to have special legal knowledge or knowledge regarding hosting service providers. In addition, anonymous reporting is possible, which is particularly relevant in cases of sexualised violence against children or illegal hate speech.

After technical and legal review by the hotlines, hosting service providers and law enforcement agencies are provided with reliable information about the illegal Internet content, taking into account national specificities.

If the content in question is stored on foreign servers, the hotlines pass the information on to the relevant partners within the INHOPE network (the umbrella organisation of hotlines). Trust built up over many years has resulted in short communication channels, which serve as a crucial success factor.

The hotlines thus make an important contribution and fulfil central functions in combatting illegal content on the Internet, thereby also supporting and facilitating government tasks. In order for them to work successfully, they require sustainable, reliable financing and governmental support.





4.4. Self-regulation and self-control must be internationally compatible

Within the framework of self-regulation, collaboration has been established between hotlines, service providers and law enforcement agencies. This has resulted in short reporting and information channels. On the one hand, this enables illegal content to be removed quickly without jeopardising prosecution measures. At the same time, service providers are made aware of current or newly emerging risky uses, which in turn contributes to the self-regulation approaches.

The Internet knows no national borders. Digital services are constantly evolving and are globally available

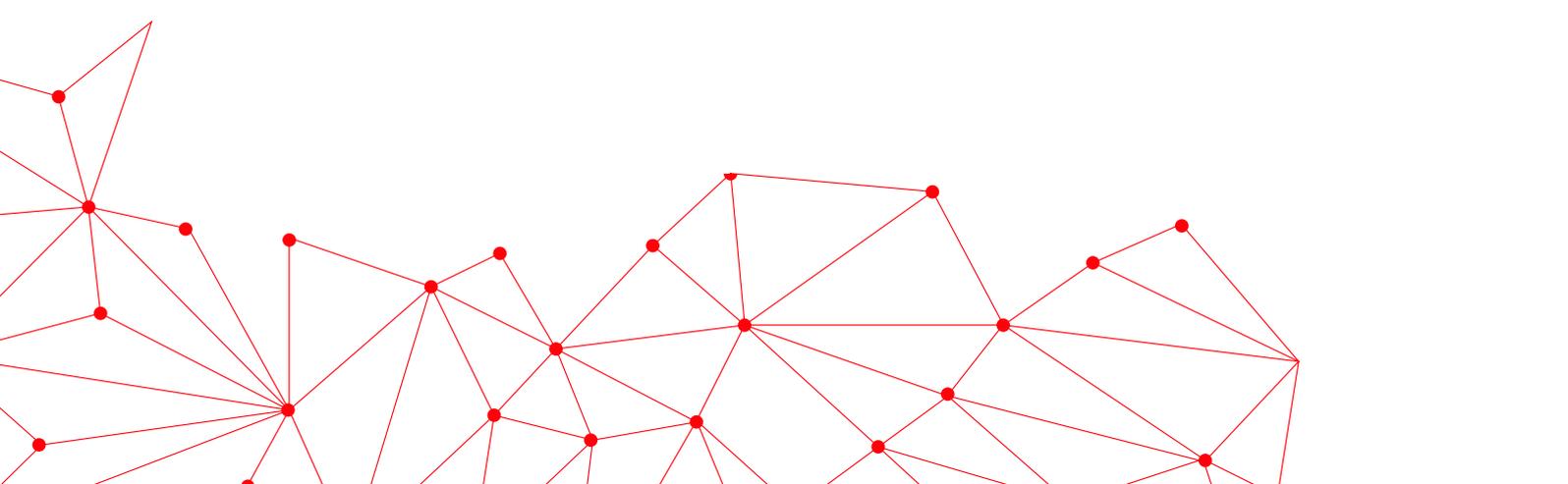
to Internet users. At the same time, there is no unified international legal framework for youth media protection. This is where self-regulation comes in and enables the establishment of uniform standards through practicable solutions across national borders. This ensures swift adaptation to technological developments and international compatibility.

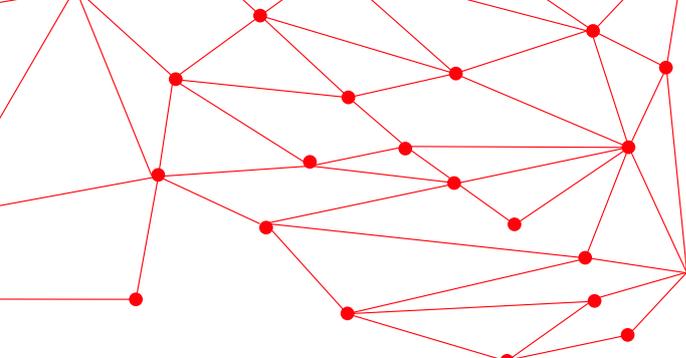
Self-regulation and self-control measures must therefore be recognised and given sufficient scope in future regulatory projects.

4.5. Age-appropriate access to Internet content

Not all Internet content and not every digital service is suitable for children and young people. In this respect, media literacy plays a major role – also for those responsible for education. In addition, there must be a reliable framework for the continuous (further) development of end-user-based technological solutions and approaches to support educators through age-appropriate access to Internet content.

The technical approaches chosen for this must be open, internationally compatible and reliable, allowing for anonymous Internet use and respecting data protection. Efforts should be made at the European level to harmonise the various national regulations on age-appropriate access to Internet content in order to make implementation practicable and more transparent for providers.





5. Protection of civil rights in the digital world

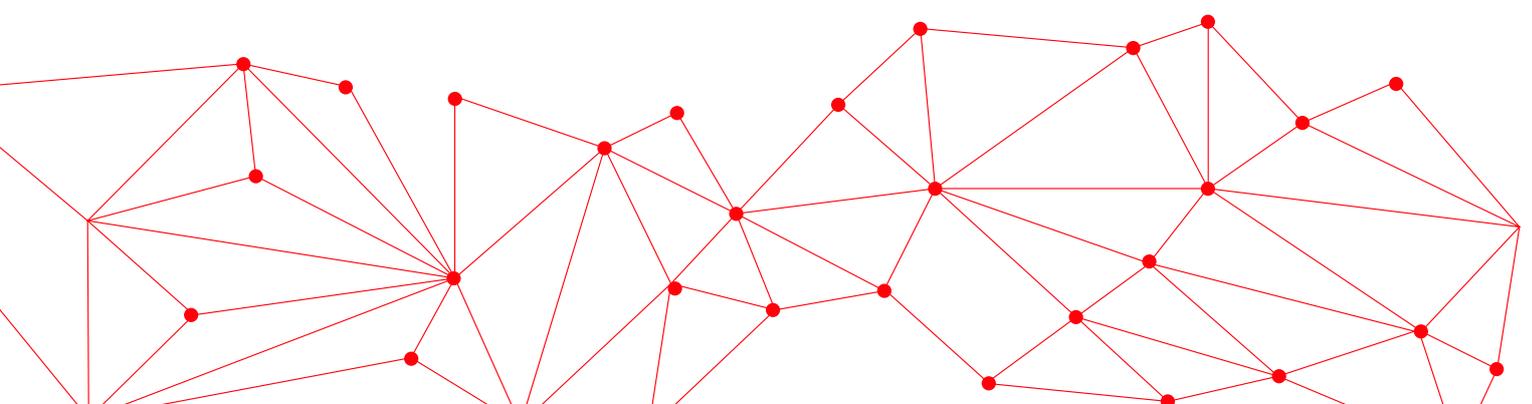
The protection of fundamental and civil rights is a pillar of the European Union. In recent years, Europe has increasingly been confronted with issues regarding the protection of fundamental rights in the context of digitalisation. The protection of the confidentiality and integrity of electronic communications has been repeatedly called into question

by numerous Member States. Unfortunately, this has not been altered by the supreme court rulings of the European Court of Justice – for example, regarding data retention. The escalating geopolitical tensions with the Russian Federation and the People’s Republic of China pose new challenges to the protection of civil rights in Europe.

5.1. Upholding democratic values

A central challenge of digitalisation and global networking is to reconcile divergent values and legal systems and to achieve a common set of values and basic consensus to ensure fundamental rights and freedoms. Adequate measures must be discussed at national, European and especially international levels. At the same time, free access to information and reports from independent media must be maintained. The European community must jointly address this political challenge through multilateral agreements and arrangements. Society, economy and policymakers must work together to find ways to combat disinformation and cybersecurity

threats. Maintaining the technical core infrastructure, as well as its functionality, interoperability and openness, is essential. Only through broad and unimpeded access to the Internet can citizens receive reliable information and a variety of perspectives. Free access to the Internet and information is imperative, especially when repressive regimes spread disinformation and fake news. We must protect communication. Access to information and independent reporting enables political discourse, even in countries with repressive regimes that restrict access to information, limit independent reporting and sanction dissenting media coverage.



5.2. Implementing coherent data protection in Europe

Given the initiative for an ePrivacy Regulation initiated in 2017 – which has now been in trilogue for four years – and the ongoing evaluation of the General Data Protection Regulation (GDPR), the upcoming EU Commission faces the central question of how to regulate the handling of personal data in the future. If the creation of an e-Privacy Regulation continues to be the focus of attention in the coming legislative term, it would be desirable if the regulations contained therein would enable strong data protection in the telecommunications sector while regulating the possibilities for processing metadata, in particular, in a standardised manner that is practicable for the economy. From the perspective of the Internet industry, it would make sense to have concrete and uniform regulations that clearly define the responsibilities of those who process data and simultaneously create proportionate requirements for the use and handling of this data. Particularly in the area of pseudonymisation and anonymisation of personal data, but also in the procedures for the lawfulness of international data transfers, the existing rules should be put to the

test. The extent to which the conditions and requirements created for data processors actually constitute reasonable regulation should also be clarified. These regulations should be based on the standards set by the GDPR and take into account its principles of the user-centred approach and the risk-based approach.

The next EU Commission should work to ensure that the European Data Protection Board (EDPB) publishes the most specific guidelines possible on key data protection issues in Europe, taking into account both the industry's codes of conduct and its advice on the realisation of specific technical issues.

In particular, however, the next Commission should strive for better structured and accelerated cooperation between data protection supervisory authorities to ensure the uniform application of the GDPR and to simplify current data protection law by harmonising existing, outdated sector-specific requirements as part of the GDPR revision.

5.3. Rejection of across-the-board and random surveillance

Civil rights are under pressure worldwide and must be protected. Authoritarian regimes use modern technology to monitor, restrict and suppress citizens. Modern technologies should not be misused to violate civil rights. This premise should also apply to the coming EU legislative term. There should be no restrictions on the encryption of electronic communications or stored data. Approaches

such as those reflected in the debate on chat control or the considerations on key management and/or the obligation for providers to enable such activities are concerning and incompatible with European values. The indiscriminate across-the-board surveillance of citizens should also not be implemented; this applies both to the storage of communication data and to real-time surveillance.

6. Sustainable shaping of European digitalisation

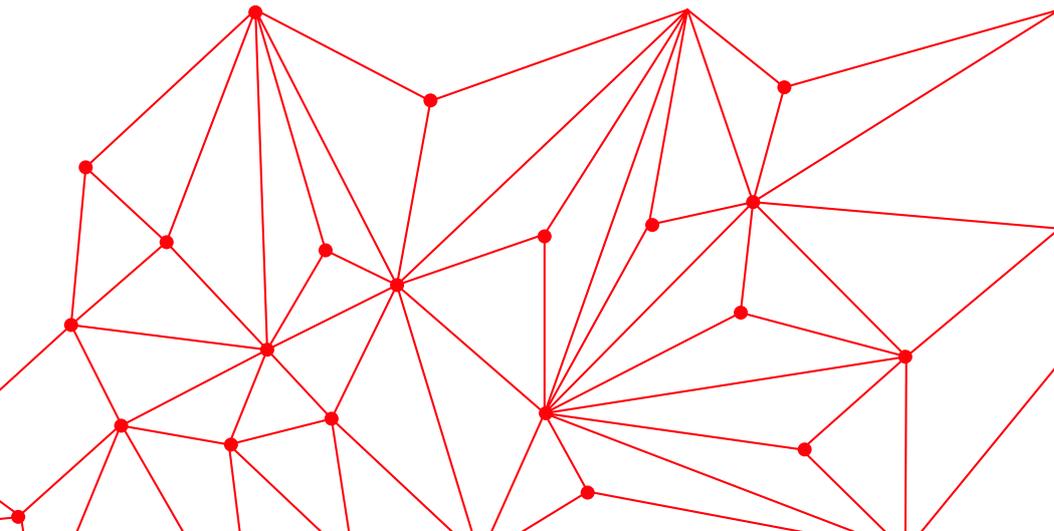
The global climate change is on the rise. Against this background, the question also arises regarding the extent to which the Internet industry can contribute to reducing emissions. The fact is that digitalisation is an enabler in the field of sustainability, but significant resource savings can only be achieved with holistic digitalisation. At the same time, the Internet industry (especially data centres)

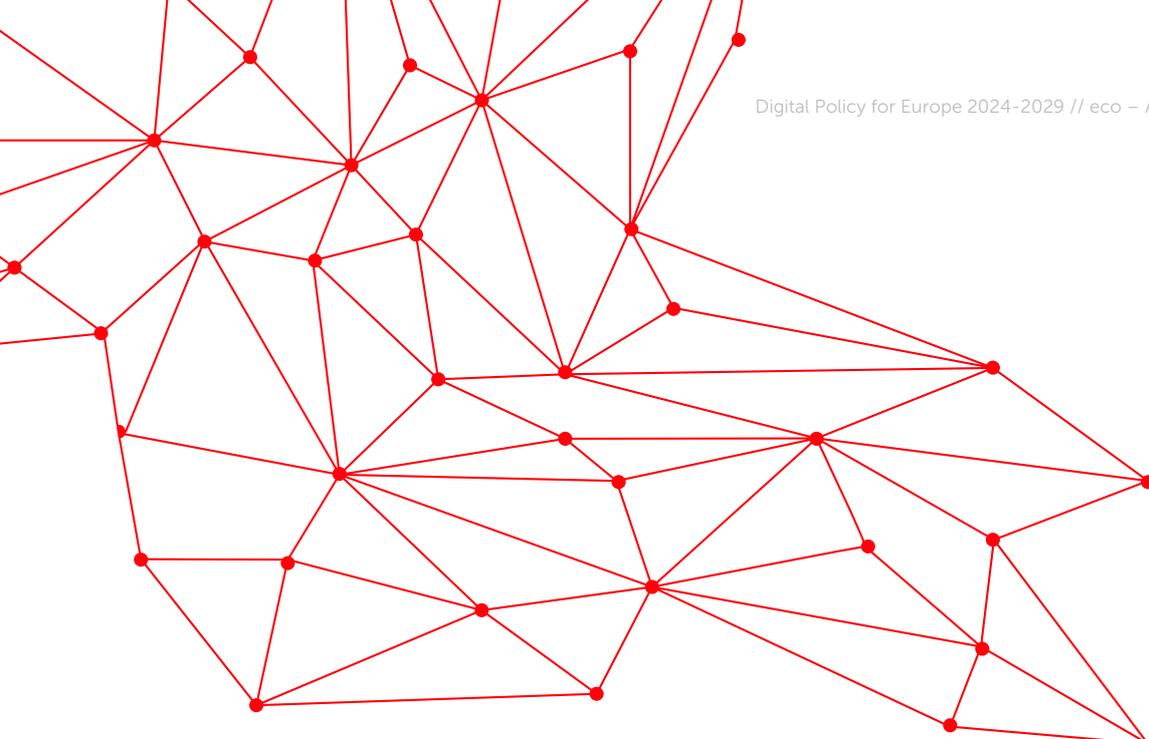
is dependent on baseload-capable electricity – preferably from renewable energy sources. This will demonstrate the extent to which a sustainable Internet industry can be promoted and supported. Digitalisation can help to save resources if it is pursued consistently. Therefore, digitalisation and politically defined sustainability goals must be reconciled.

6.1. Accelerating the expansion and availability of renewable energies

Renewable energies must be expanded consistently and on a large scale in order to ensure a sustainable and affordable energy supply for the economy and society, and also to cover the energy requirements of digital applications and infrastructures. While digital infrastructures consume energy, as the foundational infrastructure for digitalisation they also significantly contribute to increasing efficiency across sectors. In addition to digitalisation's positive effects, in order

to ensure that digitalisation itself is as sustainable as possible, operators of digital infrastructures strive to meet their energy requirements primarily from renewable sources. However, a major obstacle to this is the lack of baseload capacity, especially for wind and solar energy. Alongside the expansion of renewable energy generation, storage technologies should therefore also be increasingly promoted to enable effective utilisation by consumers with baseload requirements.





6.2. Driving forward digitalisation's contribution to climate protection

Digitalisation and sustainability must be viewed together from the outset. The number of devices connected to the Internet, the services offered on the Internet, and the transmitted data volumes increase year by year. The capacities for this can be improved both through technical developments such as more efficient software development (green coding) and through optimisations in transmission (e.g. compression and codecs). Cloud-based applications also enable significant energy savings and more efficient

resource utilisation. The upcoming Commission should set the tone in this context and provide further incentives and impetus to further promote these positive developments. It is essential to ensure a competition-promoting design of energy costs to avoid conflicts of interest between the expansion and operation of digital infrastructures and sustainability aspects. Accelerated expansion and availability of renewable energies in electricity generation are also indispensable.

6.3. Setting uniform sustainability indicators for resource-efficient digitalisation

With a growing share of the overall economy, digital infrastructures and their sustainable operation are increasingly becoming the focus of political discussions. Uniform indicators for the sustainable operation of digital infrastructures create international comparability and promote transparency. However, information and reporting requirements can also entail disproportionate administrative burdens and efficiency losses. The potentially negative effects on companies must be minimised by a balanced design of information and reporting

requirements. In the design of EU sustainability indicators, a careful balance must be struck between the goals of transparency and sustainability and the avoidance of disproportionate administrative burdens for the affected companies. Against this background, existing reporting and information obligations, such as the sustainability indicators for data centres defined by the Energy Efficiency Directive (EED), must also be regularly evaluated with the involvement of relevant stakeholders.

6.4. Making electricity prices manageable for the Internet industry

With the Guidelines on State Aid for Climate, Environmental Protection and Energy (CEEAG), the Commission has created an instrument under state aid law to enable Member States to support a cost-effective and fair transition to climate neutrality by means of state aid, thus achieving the goals of the EU Green Deal. Aside from this, and in order to meet short-term subsidy and funding requirements arising from current crisis situations, additional funds have been provided

via a Temporary Crisis and Transition Framework (TCTF). However, the framework created by the TCTF and CEEAG is not sufficient to overcome the foreseeable medium-term challenges in relation to the continuing rise in electricity prices. Digital infrastructures must also be included in aid instruments, as data centres in particular are dependent on affordable electricity prices across all sectors as a prerequisite for further digitalisation.

6.5. Conserving resources with a circular economy and efficient software

In order to promote sustainable practices and innovations, there is a need to further prioritise the development and implementation of regulatory frameworks, including clear standards for the digital circular economy. In addition to strengthening sustainability, encouraging longevity and reparability in product design and promoting component reuse can also help to reduce dependence on third countries. The Ecodesign Regulation and the Right to Repair are important building blocks in this context. In the software sector, circular economy aspects should also be taken into

account. The promotion of sustainable and resource-efficient software solutions, including resource-saving AI models, is crucial to ensure a comprehensive approach to environmental friendliness and resource conservation. In particular, what needs to be prioritised is the creation of financial incentives for companies to promote environmentally friendly practices and circular economy approaches, as well as raising customer awareness and acceptance through information campaigns and the creation of incentives for sustainable consumption habits.

7. Modernising Europe – digitising institutions and administration, pooling competencies in the Commission

The European Union has undergone major changes since the Lisbon Treaties. It has weathered a financial crisis, but now faces further challenges. In an increasingly fragmented world, European legislation needs to be carefully reviewed. The protection of citizens' fundamental rights is central to this endeavour. Such rights form the foundation of the European concept and are a prerequisite for the economic success of the Digital Single Market.

There is no alternative to a future-oriented and future-proof Europe. Only through the continuation of the EU Single Mar-

ket can companies benefit from open borders and markets without barriers for products, services, capital and employees. It is important to organise free transfers across all borders in Europe in a secure, standardised and reliable manner. Europe's success factors include multilateralism, openness and fair competition. We need an innovation-friendly European digital policy. The bureaucratic costs for the economy remain high. What is needed is a discharge, less bureaucracy and stringent and accelerated digitalisation. In order to maintain the ability to innovate, we require bureaucratic discharge and targeted support for SMEs and fair competitive conditions.

7.1. Strengthening the Single Market as the cornerstone of the European economy

The European economy benefits enormously from the Single Market – whether it's through legal certainty for investments in Member States, the elimination of trade barriers or access to a market of 450 million people. In addition, the EU has the potential to act on an equal footing with the USA and China in the field of research and the development of future technologies. A fragmentation of the Single Market or a weakening of

the EU in these areas would have negative consequences for the Internet industry. A shift to national thinking patterns or a weakening of the Single Market would therefore clearly be unconstructive. What is needed instead is the uniform implementation of European legislation and the realisation of the Digital Single Market so that innovative European companies can grow and survive on the global market.

7.2. Maintaining Europe as a strong international partner

With its Single Market, Europe is one of the strongest demand-driven sales markets in the world. This potential must be fully realised. In concrete terms, there is a need for further trade agreements with as many democratic partners as possible. A competitive European economy must be a priority and a stronger focus of the new Commission. This must also be reflected in the proposals for European digital policy. Conversely, Europe should not attempt to isolate

itself from the global economy and pursue a policy of protectionism and isolation. Free and fair trade, as well as the transfer of technology with the world, are essential for the European economy. Even in times of geopolitical tensions, the EU should therefore refrain from protectionist measures, welcome foreign investment, especially from partner countries, and promote cooperation with third countries, including in the area of digitalisation.

7.3. Improving legal coherence in Europe

Digital policy topics are often cross-cutting in nature. The increasingly relevant topics in the fields of cybersecurity and telecommunications, as well as EU foreign policy issues, add complexity and increase the need for coordination. Accordingly, various committees are working on legislative proposals. This makes coordination and coherent alignment more difficult. Last but not least, the

amount of time involved increases and delays Europe's early positioning on matters of international significance. There is a need for reform of the structures of European institutions to improve their effectiveness. Only in this way can Europe, as the world's third-largest economy, leverage its potential to exert strong influence internationally and play a significant role.

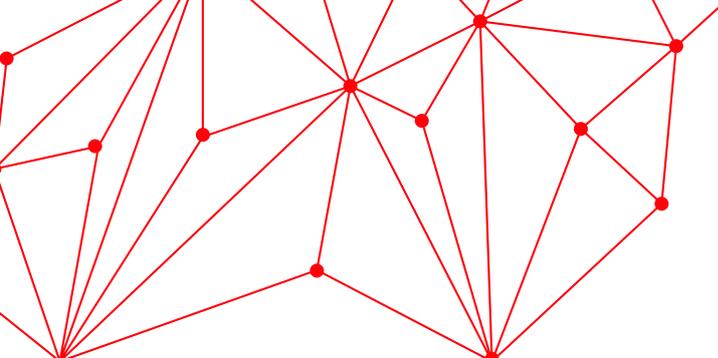
7.4. Making European administration more efficient through digitalisation

In the public sector, the adoption of cloud computing and cloud-based applications is essential for efficient digital administration. The uniform introduction of interoperable digital identities across Europe is also indispensable for the digitalisation of administrative processes and the provision of citizen services.

What is needed is a digitally positioned administration capable of communicating digitally and resource-efficiently with companies and citizens. The infrastructure required for this must be provided by the public administration

in order to open up digital communication channels for citizens and companies.

The rapid implementation of the eID Regulation should also be focussed on this context. Particularly since European legislation is increasingly obliging companies in the Internet industry to identify their customers in a legally secure manner, manageable digital solutions would make an important contribution to the legally secure and uncomplicated establishment of legal compliance for companies.



8. Digital living, learning and working

Digitalisation is changing many areas of societal life – including the workplace. Particularly in light of the increasing shortage of qualified workers in Europe, the question arises as to how digitalisation and the workplace influence each other. The Covid-19 pandemic has proven to be a catalyst for many changes in the workplace. However, since the lifting of public life restrictions in Europe, measures already taken to increase the use of digital technologies

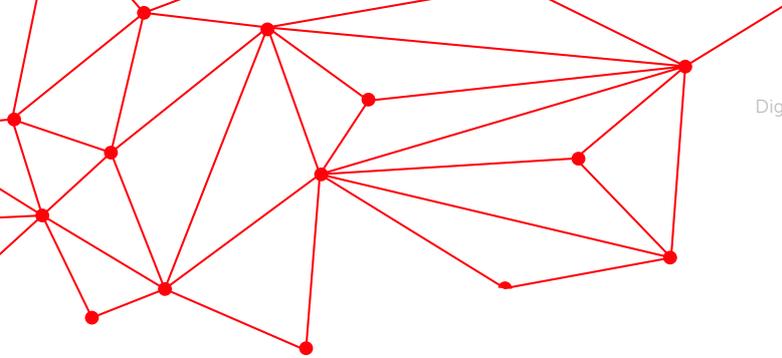
– in schools, for example – have been postponed, while reforms that were already underway have not been vigorously pursued. Digitalisation offers opportunities to improve participation in the workplace and education and to relieve the burden on families. Among other aspects, these opportunities should be utilised through open and flexible approaches to regulation and through greater personal responsibility in the operation of digital services at schools.

8.1. Digitalisation as a means of making work more flexible

In order to strengthen the compatibility of work-life balance and, at the same time, to counteract the shortage of skilled labour, greater support for child and elder care is needed throughout Europe. Supporting child and elder care strengthens the company's attractiveness as an employer and helps to attract and retain highly qualified female specialists in particular. These measures, along with the flexibility of working hours and work locations facilitated by digital technologies, help to reduce gender-specific inequalities in the workplace by enabling more women to better balance

family and career. This promotes diversity and inclusion in the workplace. The compatibility of work and family life and a further opening towards international applicants are decisive factors in counteracting the shortage of skilled labour.

Working models such as workation or working abroad are becoming more popular. However, there is a lack of a clear legal framework governing these arrangements. There is a need for uniform Europe-wide regulations on working hours, insurance coverage and tax considerations.



8.2. Adapting labour law provisions to the changing work environment

There is a need for Europe-wide responses to the changing workplace in terms of working hours and occupational safety regulations. Flexible regulations are necessary to accommodate the needs of employees working from home or mobile working. This includes options for time tracking and break regulations that align with the realities of employees' lives, as well as a culture of trust-based working hours that serves the interests of both employees and employers. In the workplace

of the future, working models such as interest-driven freelancing, project-based work and click-work are on the rise. Legal framework conditions and flexibility must also be established for these working models. Harmonised rules for immigration and the recruitment of qualified specialists are also needed across Europe in order to counteract the shortage of skilled workers. Only in this way will it be possible to effectively address labour shortages in Europe in the medium term.

8.3. Promoting digital skills across Europe

Digital skills are crucial, both in the workplace and for participation in societal life. As technology advances, developing, expanding and maintaining these skills is a continuous challenge. Lifelong learning, the development of digital skills and the establishment of Europe-wide comparable education and training standards must be promoted. The aim is to ensure easily accessible, interdisciplinary dissemination of digital skills for all age groups

and educational levels. These measures pursue the declared objective of ensuring that everyone can benefit equally from digitalisation. In particular, handling AI must be more strongly considered in schools, during education, and in further training. Proficiency in these areas is key to the widespread adoption of new technologies by society and can also prevent misuse such as manipulation through deep fakes.

8.4. Recognising digital participation as a future investment

Promoting knowledge and access to digital technologies must be brought into focus. A responsible approach to AI and knowledge of sustainable digitalisation must be communicated to citizens so that society is well prepared for the upcoming changes in daily life and the labour market. Citizens must be empowered to successfully use these technologies and integrate them into their daily lives. Further efforts must be made here to promote the education and

advancement of digital skills – across all levels of education and, above all, outside the purely academic framework. It is clear that this must be driven forward jointly by the industry, science, society and the state. There is also a need for better information about the functioning and limits of such technologies. This relates to awareness about possible dangers and misuse, but also about their potential and opportunities, especially in the field of healthcare.

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