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AGENDA

Internet Policy Agenda 2025-2029

Berlin, 14 January 2025

Introduction

International crises, the energy transition, structural change, concerns about economic growth and recession, demographic change and securing prosperity are the major challenges that Germany currently faces and must overcome.

To tackle these challenges, Germany must set digital policy priorities, consolidate responsibility, and modernise and digitalise its administration. The new German federal government must establish the appropriate framework conditions for innovation in the economy, strengthen investment in the ecosystem of digital infrastructures, and enhance IT security and resilience in Germany.

Increasing the competitiveness of the German economy must be a priority in the upcoming legislative period. To achieve this, a strong, sovereign European Single Market is indispensable. This focus must also be reflected in digital policy. The imperative goal is to reduce the backlog in digitalisation and to advance the modernisation of Germany.

In order to drive forward the digital transformation in Germany, high-performance, secure and resilient telecommunications networks and digital infrastructures are essential. Digital infrastructures must be massively expanded to meet the requirements of business, the state, administration and citizens.

Public authorities and administrative services must be adapted to the requirements and needs of a digitalised economy and society, while trust in the security of digital technologies and applications must be strengthened. There is a need for accelerated process digitalisation through effective management, debureaucratisation and simplified processes. The German nationwide introduction of cloud computing in the public sector is indispensable for digitalising administrative processes and the provision of citizen services.

To maintain innovative capacity, consistent support is needed in the area of applied research and development. Particularly for SMEs, what is also needed is continued targeted support in digital transformation and the generation of new, digitally driven value chains.

Above all, the economy in Germany must primarily be relieved of burdens and not be further encumbered. As such, the new German federal government must significantly reduce the administrative costs for businesses in Germany, avoid new bureaucratic burdens and eliminate extensive documentation requirements.

What is essential is a triad of debureaucratisation, accelerated digitalisation and a general reduction in the burden on companies. Additionally, taxes and levies that are not competitive in international comparison must also be reduced.

To support digital transformation across all economic and administrative sectors, policymakers must create the right framework conditions for digitalisation.

In the following sections, eco will highlight specific areas of action and core demands for the upcoming legislative period.

1. Central coordination and effective strategic approaches are a prerequisite for successful digital policy

The digitalisation of the state and public authorities is a vital contribution to structural change. It is often this concept that enables digitalisation in society and the economy. The state and public authorities must therefore take on a pioneering role in digitalisation.

To drive the process forward and to ensure a coherent and effective digital policy, establishing a Ministry of Digitalisation in Germany is essential. Such a ministry should consolidate the competencies to manage networks, services and projects.

This Ministry of Digitalisation requires an appropriate budget to advance projects that will have a leverage effect on Germany's digital transformation.

To enable this Ministry of Digitalisation to work effectively and deliver results, a vision of "Digital Germany 2030" is required, based on the upcoming coalition agreement and validated through dialogue with society and business. This vision would centrally define important substantive priorities for politics and administration in various digital policy aspects.

The digitalisation of public administration must be prioritised and driven forward as an important leverage project. For the modernisation of the registers as the basis for an end-to-end digitalised administration, the necessary financial resources must therefore be provided. The revised German Online Access Act (OZG) should also be supplemented by binding targets. Furthermore, the German federal government should advocate for the greater use of artificial intelligence in public administration.

Digital identities serve as the basis for digital administration in all of these endeavours. In this context, the national implementation of the revised eIDAS regulation is of particular importance. The German federal government should focus on competitive solutions that are user-friendly when designing the ecosystem for digital identities. This, for example, includes private providers of ID wallets. In addition to digital identities for citizens, greater focus must be placed on digital identities for legal entities.

Digital administration contributes equally to reducing bureaucracy for citizens and companies, while contributing to more efficient processes and faster decision-making. Achieving this requires further investment in the digitalisation and the use of existing data resources. The data laboratories that have already been tested at the federal level must therefore be continued with adequate funding and serve as a

model for public authorities at the federal states and municipal levels. These data laboratories should also promote the integration of AI applications in public administration in order to further optimise processes.

2. Clear responsibilities for cybersecurity

The security and availability of digital services and infrastructure is becoming increasingly important as digitalisation advances. Software and networks, along with the associated data centres, must therefore be prepared for a growing number of attack vectors and increased attacks – including those from state actors. Cybersecurity requirements must therefore be strengthened not only in the economy, but also increasingly in public institutions, and all actors must act responsibly within the scope of their responsibilities.

In recent years, numerous new regulations and laws have been passed at both the European and national level to compel companies in particular to make greater efforts in the field of cybersecurity and resilience. Security is now not only demanded from companies themselves, but also to a greater extent from suppliers and in supply chains. The key challenge in the upcoming legislative period will be to effectively implement these new laws and regulations and to evaluate their impact.

A substantial improvement in cybersecurity should be achieved within a meaningful regulatory framework with a clear allocation of responsibilities for operators, developers, public authorities and users, in line with their respective capabilities and possibilities.

This applies all the more in the debate on the integrity of networks and network infrastructures. From the perspective of the Internet industry, there is a need for clear and transparent laws, alongside regulations and guidelines that are independent of political influence and enforced by neutral supervisory authorities such as an independent German Federal Office for Information Security (BSI). Furthermore, harmonised legislation is essential in order to avoid unclear structures – such as those related to registration authorities and deadlines – and more bureaucracy.

3. The German federal government must support the Germany AI location through proportionate regulation and the creation of strong digital infrastructures

Artificial intelligence and data-driven business models are just two of the key innovations in digitalisation that are fundamentally impacting our economy and society. Digital platforms, for example, can help to reduce pollutant emissions in the mobility sector through more efficient use of transport systems. In this context, it is crucial to eliminate outdated regulations and unnecessary bureaucratic requirements, while establishing a suitable regulatory framework.

With the European AI Act, a comprehensive framework for dealing with artificial intelligence has been created. To ensure that Germany is positioned into a leading AI location, this regulation must now be implemented into German law in an

innovation-friendly and unbureaucratic manner and in close coordination with the other member states.

The transposition should take place as quickly as possible and in close coordination with the relevant stakeholders in order to establish the necessary legal certainty for companies in Germany and to meet the deadlines set by the EU. The German implementation law should regulate federal competencies and, where applicable, sector-specific state competencies. This can help to avoid the creation of duplicate structures.

Furthermore, the next German federal government should apply at the EU level to ensure that providers and users of AI are not additionally burdened by further regulatory requirements. Especially for SMEs, the necessary computing capacities must be made available and real-world laboratories must be created so that they can test their artificial intelligence systems.

Artificial intelligence is also subject to the data protection regulations and, where applicable, sector-specific regulations. In order for innovations such as artificial intelligence and modern, data-driven business models to be successful in Germany, an appropriate regulatory environment is essential. This should be based on streamlined, clear and proportionate ex-ante regulations, taking into account the fact that German companies compete directly with companies worldwide in applying artificial intelligence.

It is also expedient to strengthen supranational organisations such as the OECD to ensure the structured international coordination of digital policy. To successfully establish modern technologies and data-driven business models, companies and research institutions need access to high-quality data. The German federal government should therefore continue and further promote data exchange within the EU and with third countries. In this context, attention should also be paid to ensure coherent implementation when transposing European regulations such as the Data Act, in order to avoid undermining the envisioned single market for data. In addition, the availability of public data must be further improved, and a legal entitlement to open data must be established at the federal level.

Finally, corresponding computing capacities are needed for new disruptive technologies and possibilities. The next German federal government should create the necessary conditions for German companies to introduce these technologies as market leaders. Quantum technologies are becoming increasingly essential for Germany’s competitiveness as a business location and have a significant impact on digital sovereignty and cybersecurity. Quantum ecosystems must be further developed through economic development programmes to strengthen Germany as an investment location. Accordingly, these technologies must also become an integral part of the “Digital Germany 2030” vision.

4. A forward-looking energy and climate policy unlocks the potential of digital technologies and services

Global climate change poses a key challenge for politics, the economy and society. Alongside the expansion of renewable energies, digitalisation is one of the decisive levers for addressing this challenge. This is because innovative digital approaches are crucial to significantly advance energy efficiency and climate protection, as well as helping to reduce emissions in sectors such as energy, transport and industry in a targeted manner. Flexible control of the power grid, optimisation of traffic flows by using mobility data, and waste reduction through AI-supported process improvements in manufacturing and production can all enhance efficiency and save energy. High-performance digital infrastructures such as data centres and gigabit-capable telecommunications networks are a prerequisite for the sustainable transformation of the German economy, as they form the foundation for efficiency gains through digitalisation.

With increasing digitalisation, the demand for digital infrastructures is rising. This is accompanied by an overall increase in energy consumption in the operation of these infrastructures. Since electricity price is the most important cost factor for operating digital infrastructures, operators have a vested interest in actively promoting the optimisation of energy efficiency. To ensure the long-term competitiveness of digital infrastructure ecosystem providers, it is crucial to secure a constant, reliable and affordable electricity supply from renewable sources. The expansion of decentralised renewable energy generation also necessitates increased expansion of the electricity grids. As such, in the short to medium term, grid fees will become a cost-driving factor in the energy supply for data centres. For the Internet economy, access to cost-effective, renewably generated and base-load capable electricity is essential.

The availability of electricity and heat networks is also becoming an increasingly decisive factor when it comes to choosing a location for data centres. With the growing demand for data processing capacity and the associated industry growth, competition for high-performance power connections is also increasing. Furthermore, the field of energy storage requires special and pragmatically implementable support, as it will become increasingly important for providers of the digital infrastructure ecosystem in the coming years.

The obligations for data centres to feed their waste heat into heat networks, which were newly introduced in the last legislative period, urgently need to be evaluated in an unbiased manner with regard to their consequences for Germany as a data centre location. This is because the requirements for the capacity and availability of heat networks are not within the sphere of influence of data centre operators.

5. The German federal government must promote the development of a high-performance ecosystem of digital infrastructures as the foundation for Germany's competitiveness as a digital location

The open, interoperable and decentralised structure of the Internet must be preserved. Net neutrality must be guaranteed in Germany and the EU, while legal clarity must exist for all players in the Internet industry.

For cross-sector digitalisation and competitiveness, the availability of high-performance fibre-optic networks, gigabit-capable connections and the latest generation of mobile networks is essential. It is therefore important to promote the accelerated construction of networks that are economically viable in their own right, and to design network expansion and infrastructure migration in a competition and innovation-friendly manner.

A functioning ecosystem of digital infrastructures includes data centres, co-location providers and cloud infrastructures, as well as reliable and high-performance Internet exchange points. These form the backbone of digitalisation. Artificial intelligence and the cloud are indispensable as levers and drivers of cross-sector digitalisation. In Germany, there is a backlog in the availability of sufficient computing capacity and open computing models for AI models and LLM (large language model) applications. Quantum computing and related technologies such as quantum encryption are not only important for the entire economy, but also constitute a part of the digital infrastructure of the future.

Significant progress is expected in the areas of secure energy supply, traffic planning and natural sciences through quantum technologies. These have the potential to contribute substantially to solving societal and technological challenges. It is therefore crucial for Germany as a business location to advance the research and further development of quantum technologies. An innovation-friendly approach through public funding ensures the further development of the quantum ecosystem.

To further advance the technology and secure Germany's global competitiveness, it is essential to expand this technology sector in Germany and to achieve a leading position on the international level.

6. Promoting digital education and skills is a federal policy task

The comprehensive development of a digital learning and education landscape in Germany is fundamental to securing the innovative strength of the German economy and the demand for long-term skilled workforce needs, as well as strengthening societal resilience. This includes not only providing schools with the necessary technical equipment but also offering digital teaching and learning materials and enabling teachers to convey digital content and approaches effectively.

The education of children and teenagers must include fundamentals of computer science, as well as the significance and functionality of algorithms, data and media

literacy. Only in this way can we educate the shapers of our digital future and secure tomorrow's skilled workforce.

On the one hand, schools' technical equipment must be improved across the board and teachers must be empowered to teach digital skills to their students. To this end, digital skills must be integrated into the curriculum as early as the teacher training stage, and regular continuing education must be offered in dealing with digital technologies and designing didactic concepts for digital education.

On the other hand, it is not only important to teach IT skills and the fundamentals of computer science across the board, but also to focus on educational policy efforts on developing judgement ability, problem-solving competence and a responsible approach to AI and other future technologies, while ensuring greater educational equity.

In the next legislative period, further efforts must be made to advance education and the promotion of media literacy and digital skills in schools. The continuation of a nationwide funding framework such as the Digital Pact for Schools is an important instrument in this regard. Furthermore, budgeted funds in the federal states must be consistently accessed to implement digitalisation measures in schools.

7. The German federal government must develop effective strategies and measures to support SMEs in digital transformation

Despite some progress, the level of digitalisation in the German economy is still insufficient. SMEs, which play a central role in the German economy, have some particular catching up to do regarding data usage or the integration of digital processes into their business models.

To enhance their competitiveness and future viability, the German economy must better harness the potential of digital technologies, such as AI applications or IoT products and applications. The necessary investments, as well as those in training and continuing education of skilled workers, should be promoted by the federal government in the form of depreciation options. In addition, it is essential to design regulatory frameworks for data usage and key cross-sectional technologies in a streamlined and bureaucracy-free manner, in order to lower the barriers to entry for SMEs. Supervisory authorities should also serve as points of contact for companies, providing guidelines and best practices for practical challenges related to data usage or digital technologies. This also requires a sensible pooling of competencies and resources at the responsible supervisory authorities for implementing European and national legislation in the field of digital policy.

The German economy has a strong international focus, with the European Single Market playing a prominent role for many companies. For SMEs to be able to operate and scale internationally with digital business models, the uniform implementation of EU legislation in Germany is necessary to create legal certainty and reduce compliance costs for companies.

To this end, further efforts should be made to reduce bureaucracy, such as applying the "one-in-two-out" principle to new legislation. In addition, reporting obligations

for companies should be simplified where possible and reviewed for their practicality. Only in this way can the positive effects of digitalisation become effective for the local economy.

8. The German federal government must strengthen citizens' trust on the Internet

Trust is a central element for successful digitalisation. The protection of civil rights is the foundation for the trustworthy use of digital services and networks.

This means that citizens should not be exposed to the risk of widespread, indiscriminate surveillance by governments when using digital services. Restrictions on fundamental rights must be designed proportionately and comprehensibly. Specific legal bases and precise intervention thresholds must be defined for any such restrictions, and it should be possible to monitor their use by independent bodies. As such, the German federal government should advocate for this.

The protection of personal data is crucial for building trust and acceptance of services and applications. The principles of the EU GDPR have proven to be effective. However, in Germany, the application of these rules is hindered by federal structures. The German federal government should strongly advocate for the standardisation of data protection supervision and ensure that bureaucratic requirements are proportionate to the protected interest. In this context, data protection requirements must also be scrutinised: on the one hand, to ensure that the requirements for companies and public authorities are proportionate; and on the other hand, to enable citizens to participate digitally and to handle their data in a self-determined and responsible manner. When using online platforms and social media, citizens are required to handle their personal data sensitively and to consciously question sources in the field of disinformation.

Against the background of growing tensions in various regions of the world and an emerging system conflict between democratic and non-democratic states, care should be taken to ensure that measures to protect against manipulation respect civil rights and are considered in a meaningful way alongside possible measures against the actions of relevant actors.

9. The German federal government must further strengthen hotlines as effective self-regulatory measure in combatting illegal content online

Combatting illegal Internet content effectively requires a combination of legal requirements and cooperation within the framework of self-regulation and self-monitoring.

Digital service providers have a responsibility for taking action against known legal violations. Providers of very large online platforms also face additional requirements and responsibilities under the Digital Services Act (DSA). The role and capabilities of different service providers should be taken into account both in the implementation of these obligations and in the context of future regulations.

One major task is the practical implementation of the DSA's requirements, especially with regard to the interaction between established actors and newly recognised Trusted Flaggers and out-of-court dispute resolution bodies under the DSA. Both Trusted Flaggers and out-of-court dispute resolution bodies are tasked with legally assessing reported content. To avoid contradictions in the application of the law, it is essential that recognised organisations engage in regular exchanges and collaborate with each other. This includes cooperation with other established actors such as the hotlines acting as national alert platforms for reporting illegal content (unless they are themselves recognised as Trusted Flaggers), state media authorities and the German Federal Agency for the Protection of Minors in the Media. The regular exchange and cooperation among actors must be strengthened and supported.

Within the framework of self-regulation, cooperation has been established between hotlines, hosting and online platform providers, and law enforcement agencies. This has established direct channels for relaying reliable and validated reports and information on illegal Internet content. This enables the rapid removal ("deletion") of illegal content without jeopardising law enforcement measures.

Hotlines are a central point of contact for citizens. Here, they can report potentially illegal Internet content in a low-threshold, anonymous manner and without legal (prior) knowledge or familiarity with hosting service providers, and have it checked.

When developing and implementing frameworks, it is essential to leverage synergies with established structures and actors, to build on effective processes and to develop them further if necessary.

Self-regulation and self-monitoring measures allow for rapid adaptation to technical developments, practical solution approaches and uniform standards across national borders. They must be given sufficient scope to operate effectively. The important work and bridging function of the hotlines should be supported with state funding.

Increasingly, the political debate is calling for age-appropriate access to Internet content and digital services. In this regard, end-user-based solutions are indispensable. The framework conditions must be technology-neutral and internationally compatible, enable anonymous Internet usage, and respect users' data protection and privacy.

10. Internet policy, digital technologies and markets must always be considered from both European and international perspectives

At both the European and international levels, cooperative models must be developed to address overcoming global challenges. Discussions in the fields of Internet governance and Internet policy have a global dimension and must therefore also be debated in the relevant committees and forums. The principle of a multi-stakeholder approach to the self-regulation of the Internet must be further strengthened and supported.

The Federal Republic of Germany, the European Community and the G7 states must jointly address the political challenges and implications. The approaches at G7 and in the UN are already pointing in the right direction and must be strengthened in the future.

International cooperation with partners in the field of Internet governance and global digital order must be further expanded and strengthened. The Internet can only function if it is managed collectively according to multi-stakeholder principles, rather than being dominated by individual actors or governments.

International connectivity, cross-border telecommunications infrastructure, data traffic and data transmission within and outside the EU are the foundation of the global networking of economy, society and science. The international community must work to ensure that the Internet's free, open, technology-neutral and decentralised structure is preserved and further promoted. Due to the global nature of the Internet, digital technologies should also be regulated internationally as far as possible. Alongside independent technical bodies for managing the Internet online, the strengthening of the European Digital Single Market plays a central role. In this context, shared rules with international partners should be established, and an appropriate, competition-oriented legal framework for digital companies and business models should be created.

The global connectivity and cross-border dimension of the Internet also brings with it challenges that are not Internet-specific. Disinformation campaigns and manipulations on the Internet can destabilise states and endanger international peace and social cohesion. Free access to the Internet and reliable information, as well as free and independent media, play a crucial role for resilient democratic states.

Free access to the Internet and information is elementary, especially when repressive regimes spread disinformation and fake news. In light of current developments, adequate measures to ensure open and free access to the Internet and to independent media must be discussed at national, European and particularly international levels.