Evaluation of the German Coalition Agreement (KoaV)

Starting Point: eco's Requirements – Internet Policy Agenda 2024/2025

Central coordination and effective strategic approaches are prerequisites for successful digital policy		
Project	Assessment	+/-
Restructuring of government work		
Creation of a Ministry of Digitalisation and State Modernisation *Implicit announcement through the establishment of the ministry leadership* *(p. 143, 4564)*	Generally, this is a strong signal. However, its success depends crucially on the implementation. The Coalition Agreement (KoaV) lacks further information on the planned Ministry of Digitalisation and its implementation. There is no specific mention of the creation of a Ministry of Digitalisation, with the CDU merely signalling its intention to lead a Ministry of Digitalisation and State Modernisation. The specific structure of the ministry and its responsibilities have not been outlined. No further details have been provided regarding financial resources. Moreover, the state and public administration must also take on an internal pioneering role in digitalisation.	Match
Ministry of Digitalisation		
Creation of a Ministry of Digitalisation and State Modernisation *Implicit announcement through the establishment of the ministry leadership* *(p. 143, 4564)*	Generally, this is a strong signal. However, its success depends crucially on the implementation. The Coalition Agreement (KoaV) lacks further information on the planned Ministry of Digitalisation and its implementation. There is no specific mention of the creation of a Ministry of Digitalisation, with the CDU merely signalling its intention to lead a Ministry of Digitalisation and State Modernisation. The specific structure of the ministry and its responsibilities have not been outlined. No further details have been provided regarding financial resources.	Match

	Moreover, the state and public administration must also take on an internal pioneering role in digitalisation.	
Digital administration/e-Government needs ambitious goals		
Our administration should be connected, efficient and effective, as well as easily accessible and user-friendly for everyone. To this end, we want to digitise administrative services and make them accessible to all. (p. 56, 1794) We are committed to consistent digitalisation and a "digital-only" approach: administrative services should be made available digitally via a central platform ("one-stop shop") in an uncomplicated manner, i.e. without the need to visit a government office or submit written forms. (p. 56, 1802) Our mission statement: a proactive, connected, efficient and user-centred administration – increasingly application-free, situation-oriented and purely digital (digital only) with targeted support services. End-to-end digitalisation and digitally compatible laws are the related key. States and municipalities will be enabled to use the following solutions, which will be implemented as a matter of priority: an interoperable and European-compatible sovereign Germany Stack that integrates AI,	The goals announced in the Coalition Agreement (KoaV) are certainly ambitious. The plans for modernising the administration and creating a Ministry of Digitalisation and State Modernisation sound promising. However, nothing new has been announced in the field of digital administration. There are also no specific indications as to when the register modernisation will be completed or when the implementation of digital-only will take place. The digital implementation of administrative services must become the standard but this requires clear targets, which are currently lacking. The "once-only" principle should be consistently implemented, which is to be welcomed. The use of AI can additionally help to accelerate processes. However, the intended measures must be underpinned with binding targets and the necessary financial and personnel resources. Furthermore, eco Association believes that the binding nature of digital administration must be increased by means of a legal entitlement to digital administration. The announcement of the administrative cloud is also generally positive. However, the details of its design are also important here.	Match

cloud services and basic components. In setting up these structures, we will check whether European providers have already developed appropriate solution models. In the future, we will legally exclude untrustworthy providers. The German federal government will strengthen its core infrastructure, such as networks and data centres. The German Government Cloud (DVC) will be implemented with sovereign standards to ensure interoperability and prevent uncontrolled data leaks. We are modernising registers and creating access to public administration via the automatically provided Germany ID and the secure eID/EUDI wallet. We make extensive use of automation and AI. We aim to make the state an anchor customer for the digital economy and prioritise using private IT service providers in order to strengthen digital sovereignty. An ecosystem is to be developed around the EUDI wallet. (p. 67, 2156)		
Digital identities must be advanced		
We are modernising the register system, creating access to public administration via the automatically provided Germany ID and the secure eID/EUDI wallet. Automated and	The creation of an EU-wide, interoperable eID is a positive step. This must be aligned with the standards of the eIDAS Regulation and taken into account in future planned legislation. Private-sector ID solutions	Match

AI technologies will be used extensively. They will make the state an anchor client for the digital economy and intend to prioritise the use of private IT service providers to strengthen digital sovereignty. An ecosystem is expected to develop around the EUDI wallet. (p. 67, 2166) Every citizen will be required to have a citizen account and a digital identity. We will make the EUDI wallet available to citizens and companies, enabling identification, authentication and payments. (p. 56, 1804) We will provide the EUDI wallet for citizens and companies, enabling identification, authentication and payments. (p. 56, 1805) We support an electronic European social security card with digital EU identity (EUDI wallet). (p. 16, 494)	and wallets must also play an equal role. A central citizen account, such as the proposed Germany ID, is a positive indication. The eIDAS Regulation stipulates that Member States must offer their citizens an ID wallet by 2026. Companies and organisations should also be able to use a wallet. So far, there has been little tangible progress in Germany. More speed is needed here. However, the Coalition Agreement (KoaV) does not contain any specific timelines for the implementation.	
Right to Open Data, data labs must continue to be funded		
Where possible, we will establish a legal entitlement to Open Data from state institutions. (p. 70, 2245)	From eco Association's point of view, a right to Open Data is necessary to improve the availability of administrative data for companies, academia and civil society. In addition, data labs have proven their worth in various ministries and should continue to be funded. A genuine right to Open Data would be a positive step, but the Coalition Agreement (KoaV) does not provide any details on how this would be implemented in practice.	Match

	Furthermore, data labs are not mentioned. There is also no timeframe for establishing the right to Open Data. The restriction "where possible" is also seen as problematic.	
Clear responsibilities for cybersecurity		
Project	Assessment	+/-
No new security laws, but focus on implementing European regulations		
We will promptly adopt a sound umbrella law for critical infrastructures (KRITIS). (p. 84, 2697) As part of implementing the NIS2 Directive, we will revise the German Federal Office for Information Security Act (BSI). (p. 84, 2682)	In the sense of coherent and transparent legislation, it would be useful to consolidate all requirements for IT companies exclusively in the NIS2 implementation law. Fragmentation of legal requirements fuels legal uncertainty. As the NIS2 law is currently in a state of discontinuity, the government would be well advised to act swiftly and implement the NIS2 Directive as quickly as possible in order to avoid uncertainty for companies operating internationally. If the amendment to the German Federal Office for Information Security (BSI) Act aims, among other aspects, to allow the BSI independent of instructions in future, this is to be welcomed. However, the Coalition Agreement (KoaV) does not provide any further details on this. The reference to the "strengthening of the BSI" (cf. p. 83) does, however, point in this direction.	Match
Responsibilities for cybersecurity must be clearly defined		
We will continue to develop the national Cybersecurity Strategy with the aim of a clear distribution of roles and responsibilities, strengthening the German Federal Office for Information Security (BSI) and expanding it into a central agency for information and cybersecurity issues (p. 83).	A clear allocation of roles and responsibilities in cybersecurity issues is to be welcomed, as is the strengthening of the German Federal Office for Information Security (BSI) and the planned expansion of the BSI into a central authority for information and cybersecurity. However, there is a lack of detail regarding the concrete implementation. Overall, due to this lack of specificity, the plans appear unambitious.	Match

Role of the German Federal Office for Information Security (BSI) (independence)		
We will continue to develop the national Cybersecurity Strategy with the aim of a clear distribution of roles and responsibilities, strengthening the German Federal Office for Information Security (BSI) and expanding it into a central agency for information and cybersecurity issues. (p. 83)	While the BSI is to become a central authority for information and cybersecurity and, in principle, more independent, there is no mention of it becoming completely independent. In general, there is a lack of concrete details that would allow us to determine the exact form this will take.	Match
The German federal government must support Germany as a location for AI by implementing balanced regulation and creating strong digital infrastructures.		
Project	Assessment	+/-
Good regulatory framework for data use in the mobility sector		
We are creating a modern regulation for mobility, health and research data.	Although connected mobility is set to play an important role, there is no ambitious plan for a solid regulatory framework for data use in the mobility sector. The Coalition Agreement (KoaV) contains no further details on this topic.	No Match
Uniform and innovation-friendly implementation of the AI Act		
We aim to ensure that the technical and legal specifications of the AI Act reduce the burden on the economy. We will ensure that the national implementation of the AI Act is innovation-friendly and unbureaucratic, and that market supervision is not fragmented. In view of the dynamic developments in this field, we will adapt the European digital legislation accordingly. We will provide companies with a central service point. We will ensure appropriate participation of civil	An innovation-friendly and low-bureaucracy implementation of the AI Act, as well as the reduction of burdens for companies through technical and legal specifications of the AI Act, can generally be viewed positively. However, if a revision of the AI Act is being considered, this must be viewed negatively, as it could lead to legal uncertainty. Uniform rules on the use of AI in companies are needed. These could be jeopardised by the mandatory involvement of workers' councils, depending on how they are designed.	Match

society and trade unions. In the development of key technologies, we support ecological, social and economic sustainability as well as AI safety. We will examine whether and, if so, in what form liability rules need to be adapted at European level with regard to artificial intelligence. (p. 70, 2268) Authors must be appropriately compensated for the use of their works that are necessarily employed in the development of generative AI. (p. 88, 2826) In copyright law, we will ensure a fair balance between the interests of all stakeholders – creators, industry and users. Authors must be adequately remunerated for the use of their works that are necessarily used in the development of generative AI. (p. 88, 2825)	From the perspective of the Internet Industry, additional liability rules for AI should not be introduced. The national liability regime already covers liability for AI through its technology-neutral approach. The revised Product Liability Directive now also covers damages caused by artificial intelligence. There is a risk of over-regulation. The planned involvement of civil society and trade unions in the implementation of the AI Act should also be viewed critically. The wording on copyright is problematic and may contradict the goal of making Germany and Europe a leading location for AI. From eco Association's perspective, a "fair balance" between creators and industry or appropriate remuneration – for example, for works used for AI training purposes but generally freely available on the Internet – is not appropriate.	
Provision of AI computing capacity for SMEs and start-ups and further support measures		
By promoting and utilising key technologies, we aim to create an administrative revolution, economic growth and societal added value. We focus on leading-edge AI innovations (e.g. industry-specific AI language models). We are improving access to data and high-performance computing capacities and aim to attract more professional workers –	Providing computing capacity for AI training is an important measure for promoting AI as a location. The other announced support measures can also help bring about a paradigm shift away from regulation and towards promoting innovation. Providing computing capacity for SMEs and start-ups must be low threshold. As with the real-world laboratories, the necessary capacity is also required here.	Match

particularly women – into the IT sector. We are providing targeted support to small and medium-sized enterprises (SMEs) and start-ups, in particular through targeted initiatives such as AI real-world laboratories. We are strengthening the transfer into new business models and specific fields of application, such as industrial artificial intelligence, automotive, healthcare and social innovations. (p. 70, 2261)		
Internal market for data must not be undermined		
We aim to foster a culture of data use and data sharing that establishes a data economy, promotes innovation and protects fundamental rights and freedoms. To this end, we eliminate legal uncertainties, unlock data potential, promote data ecosystems and focus on data sovereignty. We are laying the foundations for regulations that can be appropriately consolidated in a data code. We are pursuing the principle of "public money, public data" and, in doing so, ensuring trust in data management and high data quality through the use of data trustees. (p. 69, 2239)	The plans are very welcome. The bundling of "digital laws" in a data code is also a successful proposal. In particular, a coherent interpretation of the GDPR across Europe is very welcome.	Match
Target vision "Germany 2030 for future digital technologies (e.g. quantum computing)"		
We provide Germany as a leading location for future digital technologies, thereby strengthening our competitiveness and	Research into technologies such as artificial intelligence (AI), quantum technology, microelectronics and defence research for cybersecurity is to be enhanced, which is a positive development.	No Match

digital sovereignty. Key technologies such as artificial intelligence, quantum, robotics, information and communication technologies (ICT), photonics, as well as micro- and nanoelectronics offer enormous potential for transformation. (p. 70, 2257) We are launching a high-tech agenda for Germany in cooperation with the federal states. To this end, we aim to organise and promote technology-neutral innovation ecosystems and research fields in defined missions with clear goals and milestones, involving university and non-university actors, industry and start-ups. In addition to funding programmes, the state will also act as an anchor customer. As a first step, we are prioritising the following areas for the high-tech agenda and innovation funding for the following key technologies: Artificial intelligence: We are launching an AI initiative with a 100,000-GPU programme (AI Gigafactory). We will provide excellent infrastructure that will give research and higher education institutions access to the relevant computer infrastructure by establishing and expanding high-performance and supercomputing centres.	However, no concrete figures regarding expenditure or a planned budget are mentioned.	

We aim to establish AI excellence centres in collaboration. (p. 78, 2508)

Quantum technologies: We are expanding the national quantum ecosystem. High-performance quantum systems will be made broadly available, and we will accelerate the development of at least two ultra-high-performance quantum computers through competition. (p. 78, 2513)

Microelectronics: We are strengthening Germany as a microelectronics location, bringing together research, skilled labour and manufacturing – we are establishing a competence centre for chip design. (p. 78, 2516)

Security and defence research and dual use: We will expand peace and conflict research and regional research (e.g. on Eastern Europe, China, the USA) and create a funding framework for security and defence research, including cybersecurity and secure infrastructures, in order to enable more targeted cooperation between universities and non-university research with the German army and companies. (p. 79, 2547)

A forward-looking energy and climate policy unlocks the potential of digital technologies and services		
Project	Assessment	+/-
Recognising digital infrastructures as a cornerstone of sustainable digital transformation		
We will invest in infrastructure to ensure that trains run on time again, roads and bridges are in good condition, medical care is guaranteed, and digitalisation makes our everyday lives easier.	Fundamentally, this is to be welcomed, but the announcement appears unambitious and haphazard. The Coalition Agreement (KoaV) does not provide any concrete details.	No Match
Ensure access to affordable (including grid fees, etc.), renewable and baseload-capable electricity		
We aim to permanently reduce electricity costs for companies and consumers in Germany by at least five cents per kWh through a package of measures. As an immediate step, we will reduce the electricity tax for everyone to the European minimum and lower levies and grid fees. To provide planning security, our goal is to cap grid fees permanently. We will extend the electricity price compensation permanently and expand it to other sectors. We will also include data centres. For energy-intensive companies that cannot be relieved in any other way, we will introduce a special relief (industrial electricity price) within the scope of state aid regulations. This also includes continuing to provide relief to energy-intensive consumers without flexibility potential, as has been the case to date. (p. 30, 956)	Ensure planning and investment security by reducing energy prices and stabilising energy costs. Electricity-intensive companies should benefit from reduced grid fees and relief measures, including large energy-intensive consumers without flexibility. Expand electricity price compensation and permanently reduce the electricity tax to the EU minimum level. Baseload power is not addressed.	Match

To enable rapid relief of at least five cents per kWh, we will, as a first step, reduce the electricity tax for everyone to the European minimum as quickly as possible and lower transmission grid fees. (p. 47, 1501)		
Promotion of network and memory infrastructure for the development of DC locations		
To achieve the goal of cost efficiency, we advocate for a systemic approach involving the expansion of renewable energies, a power plant strategy, targeted and system-oriented network and storage expansion, increased flexibility and efficient network operation. At the European level, we are committed to an energy union that completes the internal energy market through high-performance cross-border infrastructure and the reduction of state aid-related obstacles. (p. 29, 945) We will facilitate the planning and integration of data centres into the power grid through a digitalisation initiative for electricity grid operators and increased transparency regarding grid connection capacities. (p. 68, 2192)	These announcements are to be welcomed.	Match
Open-ended evaluation of the Energy Efficiency Act (EnEfG) waste heat requirements		
The German Energy Efficiency Act (EnEfG) and the Energy Services Act will be revised,	In principle, the plans in the German Energy Efficiency Act (EnEfG) are to be welcomed. The amendment of the EnEfG requirements has been announced, including aligning the regulations with the level of the EU	Match

simplified and aligned with EU law. (p. 35, 1129) We will utilise non-technically avoidable waste heat usable without discrimination and facilitate its feed-in into district heating networks. (p. 35, 1131) We will accelerate the establishment and expansion of data centres, especially in eastern Germany, and facilitate their operation through practical design and, where necessary, amendment of the relevant regulations. We will press ahead with the practical implementation of climate neutrality and facilitate, for example, the use of waste heat for feed-in into district heating networks. (p. 68, 2197)	Energy Efficiency Directive (EED). The alignment of the requirements to EED level is viewed very positively. The announcement of a practical interpretation of the requirements for climate neutrality and waste heat utilisation is also welcome. It is unclear whether the announced revision of expansion and development plans is limited to building law aspects or refers to EnEfG requirements.	
The German federal government must promote the development of a high-performance ecosystem for digital infrastructures as the foundation for Germany's competitiveness as a digital location.		
Project	Assessment	+/-
Net neutrality		
We are committed to maintaining a free, fair, neutral and open Internet. (p. 71, 2295)	There is nothing more on the subject of net neutrality in the Coalition Agreement (KoaV). That is somewhat lacking. A clear commitment to net neutrality cannot be derived from this statement.	No Match
Broadband expansion (self-financed)		
We are making decisive progress in developing our digital infrastructure with the nationwide rollout of fibre optic broadband (FTTH) to every (rental) apartment. The principle of "market before	These plans are generally welcomed. In particular, the acceleration of expansion through the reduction of bureaucracy and the removal of obstacles to expansion is a positive step. The intention to classify the expansion of mobile communications and fibre optic networks as an overriding public interest through an acceleration law is also welcome.	Match

state" applies. We will deploy funding programmes for mobile communications and fibre optic rollout, only where market-driven expansion is not feasible. (p. 68, 2202) We are providing adequate funding for gigabit promotion. We will introduce an effective acceleration law as quickly as possible, defining the expansion of mobile communications and fibre optics as an overriding public interest. We will systematically remove obstacles to expansion and bureaucracy, for example through fiction rules. To accelerate expansion, we will introduce mandatory digital application processes (e.g. broadband portal). We will continuously raise minimum requirements for broadband connections. (p. 69, 2211)		
Consideration of data centres		
We will strengthen Germany as a data centre location and position it as a European flagship by supporting clusters as well as regional and decentralised settlements. We aim to bring at least one of the European "AI gigafactories" to Germany and promote edge computing. We will facilitate the planning and integration of data centres into the power grid through a digitalisation initiative among electricity	The general commitment to the data centre location is regarded as extremely positive. In principle, the accelerated development and expansion of data centres in Germany is to be welcomed. While, on the one hand, there is mention of promoting settlement in clusters (this could also refer to hubs such as FRA or BER), on the other hand there is reference to the grid-friendly siting of large electricity consumers. Specifically, the Coalition Agreement (KoaV) does not refer to data centres on p. 31, 1004. However, these are to be classified as large consumers. In principle, the different wording within the Coalition	Match

grid operators and greater transparency regarding grid connection capacities. (p. 68, 2192) We will accelerate the establishment and expansion of data centres, especially in eastern Germany, and facilitate their operation through practical design and, where necessary, by amending the relevant regulations. (p. 68, 2197) We will encourage the establishment of large consumers, such as storage facilities and major renewable energy producers, to locate in areas where this benefits the power grid. (p. 31, 1004)	Agreement (KoaV) may give rise to contradictions or conflicts of objectives with regard to the establishment of data centres. However, it is positive that the network efficiency of establishment and operation is to be promoted on an incentive basis.	
Promoting digital education and skills is a federal government responsibility		
Project	Assessment	+/-
Digital education as a prerequisite for securing the future		
With the new Digital Pact, we are expanding digital infrastructure and reliable administration. We are advancing application-oriented teacher training, school and instructional development related to digitalisation, self-adaptive AI-supported learning systems, as well as digitally supported substitution concepts. We are extending the accounting period for commenced cross-state measures by two years. We will reliably equip disadvantaged children with end devices. (p. 72, 2333)	There are some good approaches. However, the statements of the Digital Pact are rather vague. At present, it comes across as unambitious.	No Match

Curricula must include information technology, as well as digital and media literacy		
We are strengthening education for democracy, media and news literacy together with the federal states. To this end, we support existing initiatives and the federal programme "Culture Makes You Strong". […] We will scientifically assess the effects of screen time and social media use as quickly as possible and develop a package of measures to enhance health protection and youth media protection. (p. 72, 2340)	In principle, the initiatives are to be welcomed. However, the measures to strengthen youth media protection should not lead to additional obligations for providers. The issue of online addiction/excessive Internet use is increasingly being addressed by regulators in the context of youth protection and the Digital Services Act (DSA).	Match
Technical equipment for educational institutions		
With the new Digital Pact, we are expanding digital infrastructure and reliable administration. We are advancing application-oriented teacher training, school and instructional development related to digitalisation, self-adaptive AI-supported learning systems, as well as digitally supported substitution concepts. We are extending the accounting period for commenced cross-state measures by two years. We will reliably equip disadvantaged children with end devices. (p. 72, 2333)	This is likely to be covered by the Digital Pact. However, the funding framework appears to be rather limited.	No Match
Training and continuing education of teachers		
To ensure greater reliability and quality of the school system as well as teacher recruitment, we are utilising the Future Contract for Studies and Teaching and are	It is not clear whether this plan also covers further training for teachers in new technologies or digitalisation topics in general. In general, this comes across as very unambitious.	No Match

relaunching the "Quality Offensive in Teacher Education". (p. 73, 2351)		
Understanding the use of AI as an educational task		
We are strengthening education for democracy, media and news literacy in cooperation with the federal states. To this end, we support existing initiatives and the federal programme "Culture Makes You Strong". [...] We will scientifically assess the effects of screen time and social media use as quickly as possible and develop a package of measures to enhance health protection and youth media protection. (p. 72, 2340)	Training in the use of AI is not explicitly mentioned, but at least the development of digital skills is intended to be promoted.	No Match
Nationwide funding framework		
With the new Digital Pact, we are expanding digital infrastructure and reliable administration. We are advancing application-oriented teacher training, school and instructional development related to digitalisation, self-adaptive AI-supported learning systems, as well as digitally supported substitution concepts. We are extending the accounting period for commenced cross-state measures by two years. We will reliably equip disadvantaged children with end devices. (p. 72, 2333)	The Digital Pact 2.0 provides for a funding framework of 5 billion Euro, to be equally shared between the German federal government and the federal states. While 5 billion Euro is better than nothing, it is likely insufficient to bring all schools and educational institutions across the country to the same level in terms of technical equipment.	No Match

The German federal government must develop effective strategies and measures to support SMEs in the digital transformation		
Project	Assessment	+/-
Depreciation options for investments in digitalisation		
We will introduce an investment booster in the form of a 30 per cent declining-balance depreciation allowance on equipment investments for the years 2025, 2026 and 2027. (p. 45, 1430) Special infrastructure fund	There are some positive approaches regarding tax incentives or relief for companies that could promote investment, such as the announced declining-balance depreciation allowance, the reduction of corporate tax and electricity tax. However, it remains unclear to what extent the special infrastructure fund will support investments in digitalisation.	Match
Simplified data usage for companies		
We aim to foster a culture of data use and data sharing that establishes a data economy, focuses on innovation and protects fundamental rights and freedoms. To achieve this, we will eliminate legal uncertainties, unlock data potential, promote data ecosystems and focus on data sovereignty. (p. 69, 2239) We focus on leading-edge AI innovations (e.g. industry-specific AI language models). We are improving access to data and high-performance computing capacities and aim to attract more professional workers – particularly women – into the IT sector. (p. 70, 2264) We are facilitating data use (German Federal Data Protection Act (BDSG)) and	In principle, there is a clear willingness to simplify the use of data across various sectors – whether in the healthcare sector or in the context of innovative technical developments. This approach must also be advocated at EU level, as many uncertainties stem from EU regulations.	Match

will present a research Data Act before the end of this year. (p. 79, 2572) We will remove obstacles to improve better data exchange within the framework of the Health Data Use Act. (p. 106, 3369)		
Reducing bureaucracy / One-in-two-out		
The duration of approval procedures for industrial facilities is a critical factor for both competitiveness and the industrial transformation. These procedures are to be significantly shortened, with relevant EU directives implemented on a one-to-one basis. (p. 5, 146) Germany must take bold steps to accelerate planning and construction. A fundamental overhaul of planning, construction, environmental, procurement and (administrative) procedural law is necessary. We will launch a European initiative to speed up planning and approval processes; the national "Pact for Planning, Approval and Implementation" will continue. A uniform procedural law ("one-for-many") for infrastructure projects is to be introduced. We will exploit the potential for speeding up procedures in federal spatial planning and in the Federal Building Code. We will strengthen the multi-coding	The plans for reducing bureaucracy and accelerating approval procedures are overall to be viewed very positively. In many areas, particularly in technology promotion and network expansion, there are statements supporting low-bureaucracy implementation of future projects. However, there is no commitment to a one-in-two-out clause.	Match

of land use. Formalised procedures will be made more flexible and procedural steps will be reduced in order to eliminate duplicate checks. (p. 22, 681)

Decisive factors for the success of the energy transition are the reduction of bureaucracy and faster and better planning and approval procedures. To this end, we will resolutely continue the process between the German federal government and the federal states to implement the pact for accelerating planning, implementation and approval, develop it further, and swiftly implement the Renewable Energy Directive Act III. Among other factors, we will examine measures such as the establishment of expert pools, the expansion of implied consent and extended right of continuance for replacement facilities. (p. 30, 971)

We aim to reduce the costs of grid connections for existing business locations undergoing transformation and to standardise the approval procedures. (p. 31, 995)

We will fully implement the pact for accelerating planning, approval and implementation acceleration, together with

the federal states in the first half of the legislative period and further develop it for industrial projects. (p. 66, 2111)		
The German federal government must strengthen citizens' trust on the Internet		
Project	Assessment	+/-
Critically review surveillance measures		
We are introducing a proportionate three-month Data Retention (VDS) obligation for IP addresses and port numbers in accordance with European and constitutional law, in order to be able to assign them to a connection owner. (p. 82, 2631) Within the scope of its limited jurisdiction, we are enabling the Federal Police to use "source telecommunication surveillance" (Quellen-TKÜ) without access to retroactively stored data. (p. 82, 2632) For specific purposes, our security authorities should be able to carry out automated data research and analysis as well as subsequent biometric comparison with publicly accessible Internet data, including by means of artificial intelligence – while taking into account constitutional requirements and digital sovereignty. We will permit the use of automated number plate recognition systems in recording	The significant intensification of data collection is problematic. The indiscriminate, mass storage of private IP addresses – regardless of the specific retention period – is unacceptable. It is generally contrary to fundamental rights and violates EU law. From eco's perspective, proportionate storage that is compliant with European and constitutional law is not possible. Irrespective of this, the added value for law enforcement is questionable. In addition to our fundamental criticism of Data Retention (VDS), it is important to monitor what is being regulated within the new Digital Violence Act. Any right to information would need to be significantly amended compared to the draft presented for discussion. Incongruent solutions or Data Retention (VDS) through the back door must be rejected. Data collection through interference with information technology systems by exploiting vulnerabilities is to be viewed negatively. Such investigation methods weaken IT security, the integrity of IT infrastructures and the trustworthiness of communication. The use of AI should be properly reviewed and strictly limited to measures that do not lead to profiling or inadmissible presumptions that undermine the rule of law. The expansion of law enforcement authorities' powers must be critically evaluated, as it goes beyond the investigation of suspects and could lead to more comprehensive	No Match

mode for law enforcement purposes. (p. 82, 2633) The security authorities should be granted the authority to carry out automated (AI-based) data analysis for specific purposes. Under certain narrowly defined conditions in cases of serious criminal offences, we want to enable law enforcement agencies to perform retroactive biometric remote identification in order to identify perpetrators. (p. 89, 2850) In principle, we safeguard the confidentiality of private communications and anonymity on the Internet. (p. 69, 2231). In an increasingly digitalised world, the security authorities should receive modern, digital powers to be able to meet today's security policy challenges. (p. 89, 2848)	surveillance. Furthermore, it is unclear what is meant by the term "publicly accessible Internet data". It must be ensured that no data from protected or private areas is collected. Exceptions to the "fundamental" protection of confidentiality of private communications and anonymity on the Internet raise fears of leaving a backdoor open for attacks on encryption. Similarly, the phrasing of the "modern digital powers" of the security authorities raises concerns.	
Strictly regulate data protection supervision		
We will anchor the German Data Protection Conference (DSK) in the German Federal Data Protection Act (BDSG) in order to develop common standards. We will use all available flexibility within the GDPR to ensure coherence, uniform interpretations and simplifications for small and medium-sized enterprises (SMEs), employees and volunteers in data protection matters.	The reorganisation of the German data supervision and consolidation at the German Federal Commissioner for Data Protection and Freedom of Information (BfDI) is to be viewed positively. This can provide a decisive positive impetus to the Internet Industry and significantly reduce the burden on companies. A more coherent interpretation of the GDPR would be welcome, whereby supervision could be consolidated within the BfDI.	Match

At the European level, we aim to achieve exemptions from the scope of the General Data Protection Regulation (GDPR) for non-commercial activities (e.g. in associations), small and medium-sized enterprises (SMEs) and low-risk data processing (e.g. customer lists of trade workers). In the interests of the economy, we aim to consolidate responsibilities and competencies with the German Federal Data Protection Commissioner. They should then become the Federal Commissioner for Data Use, Data Protection and Freedom of Information. (p. 65, 2100 and p. 70, 2249)		
No overblocking		
We are creating a comprehensive Digital Violence Protection Act to improve the legal position of those affected and to enable the blocking of anonymous hate accounts with criminal content. Platforms will be required to provide interfaces to law enforcement authorities so that relevant data can be accessed automatically and quickly. (p. 91, 2937)	A right to information can make sense. However, the blocking of anonymous hate accounts with criminal content is already regulated in the Digital Services Act (DSA). The necessity and conformity with the DSA are therefore questionable. Platforms should provide interfaces to law enforcement authorities so that relevant data can be accessed automatically and quickly. This refers to the planned Data Retention (VDS) obligation – but makes no sense at this point with regard to the rights of those affected, as they should be able to obtain information outside of criminal proceedings. If both the Data Retention (VDS) obligation and the Act against Digital Violence are enacted, it is important to ensure coherent solutions/approaches for companies.	No Match

The German federal government must further strengthen hotlines as a functioning self-regulatory mechanism in combatting illegal content online		
Project	Assessment	+/-
Notice and Take Down principle		
The EU platform laws protect fundamental rights, users and fair competition. We will enforce them consistently to ensure that platforms remove criminal content and actively address systemic risks such as disinformation. The introduction of mandatory identification for bots is under review. (p. 71, 2288) We will tighten the sanctions available against platforms, especially in cases of systemic deficiencies in the removal of criminal content. (p. 90, 2882)	The statement on the topic is unclear. Removal sounds like deletion, but it is not clear whether this is meant to follow the Notice and Action principle or to be done proactively. We reject mandatory, proactive searches for the purpose of deletion. It is also important that deletion is only considered for illegal content, and that disinformation is not automatically associated with "deletion obligations". When it comes to disinformation, competence transfer is the essential approach. Various implementation options are conceivable (amendments to the German Digital Services Act [DDG], the EU Digital Services Act [DSA], or the German Criminal Code [StGB]). Depending on the implementation, there could be a collision with the provisions of the DSA and full harmonisation. Currently, there is no visible evidence justifying any legal amendments in this area.	No Match
Clear implementation of the Digital Services Act (DSA)		
The Digital Services Act (DSA) must be rigorously implemented and further developed, and systemic failures must have consequences in a coordinated procedure with the EU Commission. (p. 123, 3936) We are committed to stronger regulation of algorithms that promote radicalisation in	We welcome the rigorous implementation of the Digital Services Act (DSA). The DSA must be implemented consistently to effectively tackle illegal content and systemic risks. Uniform handling and application in the Member States is essential to ensure a consistent regulatory framework across Europe. Non-evidence-based activism should be avoided with regard to demands for stronger implementation and further development. With regard to the increased regulation of algorithms that promote radicalisation, freedom of expression must be kept in mind. The DSA	No Match

the Digital Services Act (DSA) in the EU. (p. 85, 2719)	should by no means go beyond its actual goal (dealing with prohibited content).	
Protection of Minors in the Media (BzKJ)		
Growing up with digital media requires not only media literacy, but also effective child and youth media protection. A coherent legal framework between Europe, the German federal government and the German federal states offers the opportunity to dismantle parallel structures and facilitate effective law enforcement. That is why we are designing the Youth Protection Act (JuSchG) in line with the Digital Services Act (DSA) and the State Treaty on the Protection of Minors in the Media (BzKJ). Age verification on digital devices should become standard across Europe. (p. 123, 3944)

We are strengthening the protection of children and young people. We will further improve interdisciplinary cooperation. We aim to ensure that children and adolescents can navigate safely in the digital world. To this end, we will establish a commission of experts to develop a strategy for the "Protection of Children and Young People in the Digital World" and to support its implementation across departments and levels of government. Parents in particular should be empowered | The goal of creating coherent regulations and streamlined regulation and supervision in youth media protection is welcomed. Tightening age verification would be complex and will be considered in a differentiated manner.

A mandatory obligation for age verification must not be allowed to escalate. Age verification can make sense for content that must not be accessible to minors under any circumstances. There are already comprehensive regulations in this regard via the German Interstate Treaty on the Protection of Minors in the Media (JMStV). Age verification is also already a topic at the EU level. At national level, there is currently no need for supplementary regulations, but the topic may gain momentum in the case of a demand for a minimum age requirement for social media platforms.

In principle, the following applies to Age Verification Systems (AVS): A variety of (practicable) systems are needed and companies must be given a choice if they are required to carry out verification. eco rejects mandatory AVS at the access level in combination with "youth protection default settings" for all persons who have not provided proof of being over 18.

Interdisciplinary cooperation is essential and should also include hotlines/self-regulatory forces. Further obligations for providers should be carefully considered and must not undermine existing and proven protective measures. Coherent regulations are important, especially with regard to the interaction between the JuSchG, JMStV and DSA (see above). | Match |

through targeted knowledge transfer. We will hold platform operators and service providers accountable for effectively implementing digital child and youth protection. We advocate for mandatory age verification and secure default settings for children and adolescents on digital devices and services. (p. 100, 3180 ff.) (3188) We will continue to operate the Sexual Abuse Fund and the associated Supplementary Support System with the participation of the Council of Victims and Survivors. We are closely monitoring the implementation of the Independent Commissioner for Child Sexual Abuse Issues (UBSKM Act) in cooperation with the federal states, agencies and institutions, particularly with regard to the right to access files and the obligation of institutions to review and implement protection concepts. In addition, we advocate that commercial and non-profit providers outside the child and youth welfare system also develop and implement protection concepts. We will further develop the Child and Youth Plan of the German Federal Government. As the central funding instrument for child and youth work, we intend as a first step to	AVS must not become excessive (see below). Cooperation with hotlines is also essential in the context of "Sexual Abuse Funds/Supplementary Support Systems". Better financial resources for the German Federal Government's Children and Youth Plan (KJP) are to be welcomed. eco Association and the German Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM) have already received support through the KJP. Inclusion of further funding for hotlines in the KJP would be welcome.	

increase funding for the Child and Youth Plan by ten per cent and subsequently make the financing more dynamic. (p. 100, 3198)		
Internet policy, digital technologies and markets must always be considered from a European and international perspective		
Project	Assessment	+/-
Dealing with Internet governance		
Targeted influence on elections, as well as the now-routine spread of disinformation and fake news, are serious threats to our democracy, its institutions and social cohesion. The deliberate dissemination of false factual claims is not protected under freedom of expression. Therefore, independent media supervision must be able to take action against information manipulation, hate speech and incitement on the basis of clear legal guidelines, while preserving freedom of speech. Systematical manipulative dissemination techniques, such as the mass and coordinated use of bots and fake accounts, must be prohibited. We will ensure that online platforms fulfil their obligations regarding transparency and cooperation towards supervisory authorities and examine stricter liability for content. Outlinks to third-party providers must be permitted. The Digital Services Act (DSA) must be implemented and further developed rigorously. Systemic failures	The Coalition Agreement (KoaV) does not contain an overarching agenda for Internet governance, which is regrettable. Only some statements can be found with regard to combating disinformation campaigns and manipulations on the Internet.	No Match

must have consequences in a coordinated procedure with the EU Commission. (p. 123, 3927)		
Order in the European internal market		
We want to further develop the European internal market as the engine of our economic strength. This applies especially to the sectors of energy, medical products, pharmaceuticals, digital technologies, telecommunications and transportation, including air transport. Competition within the internal market must be based on innovation and performance. (p. 136, 4330) We are creating European-integrated and resilient value chains for key industries, from raw materials to chips to hardware and software. (p. 67, 2143) Federal states and municipalities will be enabled to use the following solutions, which will be implemented as a matter of priority: An interoperable and European-compatible sovereign German stack will integrate AI, cloud services and core components. (p. 67, 2159) We are creating attractive conditions for investments in and into Europe, in particular by speeding up approval procedures, modernising competition and	We welcome the focus on digitalisation, innovation promotion and the strengthening of Germany and Europe as a business location.	Match

state aid law – adjusted more closely to the requirements of transformation and Europe's global competitiveness – and simplifying the procedures for Important Projects of Common European Interest (IPCEI). We are committed to substantially reducing bureaucracy in the EU. We welcome the fact that the EU Commission has presented initiatives to reduce administrative burdens and announced further measures. (P. 136, 4343)		
Dealing with global platforms and global threats		
Targeted influence on elections and what has become everyday disinformation and fake news pose serious threats to our democracy, its institutions and social cohesion. The deliberate dissemination of false factual claims is not protected by freedom of expression. Therefore, independent media regulators must be able to take action against information manipulation, hate speech and incitement on the basis of clear legal frameworks, while safeguarding freedom of expression. Systematically applied manipulative dissemination techniques, such as the mass and coordinated use of bots and fake accounts, must be prohibited. We will ensure that online platforms fulfil their obligations regarding transparency and cooperation towards the supervisory	We welcome the strong focus on combatting disinformation. However, when combatting disinformation, it is essential to pursue differentiated approaches. Established approaches exist for illegal, criminal content in the form of NTD/N&A (Notice-and-Takedown/Notice-and-Action). With regard to "permitted falsehoods", it is important to strengthen the (media) literacy of the population without causing fear. Only in this manner can the high value of freedom of expression be adequately respected.	No Match

| authorities and examine stricter liability for content. Outlinks to third-party providers must be permitted. The Digital Services Act (DSA) must be rigorously implemented and further developed, and systemic failures must result in consequences through a coordinated process with the EU Commission. (p. 123, 3927)

The EU platform laws protect fundamental rights, users and fair competition. We will enforce them consistently to ensure that platforms remove illegal content and proactively address systemic risks such as disinformation. (p. 71, 2288) | | |