Response to the Review of the Digital Decade Policy Programme

Thank you for the opportunity to contribute to the review of the Digital Decade Policy Programme. This review is timely, particularly in light of evolving geopolitical risks and accelerating technological concentration, and the EU's stated focus on sovereignty and competitiveness.

In our previous commentary on the Digital Decade, we cautioned that the Digital Decade targets appeared inspired by an assumption that technological progress in itself would provide solutions for the societal challenges that Europe is facing. We are encouraged that the review makes specific reference to key policy objectives that the programme needs to be updated in light of, and brought into alignment with.

Policymakers are increasingly aware of the challenges to digital sovereignty and competitiveness facing the EU, as also recognised by the Council Conclusions on European Competitiveness in the Digital Decade. The review of the Digital Decade Programme represents a crucial opportunity to orient its approach and targets in line with these priorities.

In particular, we believe that the targets require review to explicitly foreground digital commons as a central pathway to achieving the stated policy objectives of the programme.[1] Drawing from our work with the NGI Commons Consortium, we understand digital commons as digital resources that are collaboratively produced, owned and governed. Access and sharing rules ensure the development and sustainability of the resource and the community against exclusive use, exclusive profit, or value extraction. Examples include foundational open source software such as Linux, widely reused software libraries such as scikit-learn, or shared digital resources such as OpenStreetMap.

In our Strategic Agenda for the Digital Commons, we propose that digital commons are central to the vision of digital transformation that serves the public interest, enables democratic control, and respects fundamental rights. By fostering shared ownership and democratic governance, digital commons empower individuals and communities with greater control over the digital environments on which they rely. This model of stewardship

[1] We define sovereignty in terms of the "independent and self-determined use and design of digital technologies and systems by the state, private organizations and individuals". This definition draws on the work of the German Sovereign Tech Agency as well as the European Parliamentary Research Service.

is essential to realizing digital sovereignty at both collective and individual levels, ensuring that people have agency over their digital lives.

Already underpinning critical layers of the digital stack, digital commons represent a distinct approach to building and maintaining digital infrastructure, differing from both centralised state control and profit-maximising corporate models. Digital commons can be a way to reduce dependence on proprietary ecosystems that prioritise data extraction and vendor lock-in over user control and interoperability, thereby delivering long-term societal benefits and strengthening sovereignty.

A commons-based approach aligns closely with the objectives set out in Article 3 of the Decision (EU) 2022/2481 establishing the Digital Decade Policy Programme 2030, which emphasises "promoting a human-centred, fundamental-rights-based, inclusive, transparent and open digital environment where secure and interoperable digital technologies and services observe and enhance Union principles, rights and values and are accessible to all, everywhere in the Union."

This is a crucial moment to advance this orientation. The recently established Digital Commons EDIC represents high-level recognition of the role that digital commons can play in advancing the objectives of the Digital Decade. It is notable that the EDIC framework originates in the Digital Decade Programme itself, and that digital commons, with their open and participatory structures, are particularly well suited to multi-country collaboration.

In order to foreground digital commons as the foundation of the EU's digital sovereignty, the Strategic Agenda for Digital Commons proposes five key interventions: (1) aligning the EU's research and innovation funding framework with the realities of the digital commons; (2) formulating an enabling framework for sovereign and interoperable cloud providers; (3) employing public procurement as a strategic tool to channel domestic demand and proactively shape markets; (4) supporting democratic control over digital communication spaces; and (5) harness the power of the Digital Commons EDIC as a stewarding mechanism.

This approach can help align the Digital Decade Programme more closely with the strategic priorities identified in this call for evidence, while remaining consistent with the European Declaration on Digital Rights and Principles.

In this context, we would like to comment on the following aspects of the Digital Decade Programme:

1. Digitalisation of government and public services

We support the continued prioritisation of the digital transformation of public services as a core objective of the Digital Decade. However, progress should not be measured solely by whether services are digitalised, but also by how this digitalisation is achieved.

In particular, digitalisation targets and indicators should explicitly account for, and prioritise, open source, interoperability, and sovereignty. Without foregrounding digital commons, the Digital Decade risks incentivising short-term adoption that entrenches long-term dependency on proprietary, often non-EU, technologies. This can result in public institutions being locked into proprietary ecosystems in ways that undermine their ability to perform their public functions.

We therefore encourage the Commission to define clear and operational criteria related to digital sovereignty, aligned with the concept of self-determined use of technology. This work can build on existing initiatives such as the European Commission's Cloud Sovereignty Framework. However, such frameworks require greater specificity, focusing directly on meaningful sovereignty criteria rather than combining them with a broad and heterogeneous set of considerations. Moreover, these criteria should be extended beyond infrastructure to other layers of the stack, particularly software and platforms.

Public services must be encouraged to use open source software, in line with the principle of "public money, public code", and employ interoperable solutions that enable switching providers without prohibitive costs. This echoes Recital 21 of the Decision establishing the Digital Decade Programme, which states that "where public funds are used, it is crucial that maximum value be gained for society and businesses," and that public funding should aim to ensure "open and non-discriminatory access to outputs, save for substantiated and proportionate exceptions". As we have argued previously, foregrounding public value and the development of public digital infrastructure should be central objectives of public investment.

Targets and indicators for digital transformation could therefore also focus on the share of public services built on or supported by open-source and interoperable solutions, or the extent to which public administrations retain effective control over data, systems, and infrastructure.

Public procurement is a critical lever for achieving these objectives. Public bodies are among the largest purchasers of digital technologies in the EU, particularly in strategically sensitive and critical sectors. However, without a supportive framework, procurement practices often default to proprietary solutions, reinforcing lock-in and dependency.

The upcoming reform of the Public Procurement Directives, alongside proposed initiatives such as the Cloud and AI Development Act, represent important opportunities to establish a

framework that enables the preferencing of open source and interoperable technological solutions. A further opportunity lies in the forthcoming European Commission Open Source Strategy expected in 2026. Together, these initiatives could form a framework for prioritising digital commons in the digitalisation of public services.

Many of these recommendations are reflected in the Council of the EU's Conclusions on European Competitiveness in the Digital Decade. The Conclusions emphasise open standards, open source, and interoperability to enhance transparency and competition and reduce vendor lock-in and dependence on single providers, as well as strategic public procurement to support research, innovation, and the deployment of EU suppliers. The Council Conclusions similarly emphasize the importance of clear criteria for 'sovereign' cloud services, and the role of the European Competitiveness Fund in enabling a digital transformation aligned with high level objectives.

The Digital Commons EDIC can play a crucial role in supporting and operationalising these initiatives, and in strengthening the wider digital commons ecosystem. It is therefore important to align these initiatives and foreground them coherently in policy, particularly in light of the ongoing negotiations on the Multiannual Financial Framework. As we propose in the Strategic Agenda, Horizon Europe, and the European Competitiveness Fund within the proposed MFF, represent critical opportunities to earmark funding in support of these priorities.

2. Digital transformation of business

The digital transformation of business is a central objective of the Digital Decade. However, digitalisation should not be understood merely as the diffusion of specific technologies such as cloud computing, big data or artificial intelligence. As we have argued previously, it is an assumption that increasing the number of "unicorns" will in itself, lead to the policy outcomes identified in the Digital Decade Programme and in this call for evidence.

We have also noted in response to the Apply AI Strategy, a limited focus on AI treats the technology as having an inherent capacity to positively transform various areas of life. This risks the pursuit of "AI without purpose": technological solutions in search of problems to solve. To avoid technosolutionism, AI solutions need to address real societal needs and serve communities across Europe.

In addition, digital transformation that increases market concentration or exposure to geopolitical risks can undermine the priorities that the Programme seeks to promote. In our White Paper on Public AI, we advocate for building public AI capacity in order to reduce dependencies on dominant commercial players and establish independent means to deploy AI systems.

Public procurement plays an important role not only in the digitalisation of public services, but also in shaping the digital market. If public funding is channeled towards the adoption of technologies such as cloud computing and AI, it should therefore prioritise solutions that enable interoperability, portability, and meaningful user control, rather than reinforcing dependence on closed and extractive ecosystems.

Through strategic procurement, public authorities can create markets for interoperable and open technologies and provide demand-side support that complements existing research and innovation funding. Without such demand-side support, many EU-supported technologies struggle to scale and compete with entrenched incumbents.

Support for the adoption of digital technologies should therefore be conditional on their contribution to the broader objectives of the Digital Decade and the Union's policy priorities. This includes technological sovereignty, sustainability, economic resilience, and the protection of democratic values.

3. Skills

The focus on a digitally skilled population remains a laudable goal. However, the Digital Decade Policy Programme should place greater emphasis on training and capacity-building related to open technologies, rather than reinforcing closed and proprietary ecosystems as the default.

While skills are a foundational enabler of digital transformation, choices related to training and capacity-building also embed technological pathways and shape long-term dependencies. For example, expertise in a specific cloud ecosystem can create a form of lock-in. Organizations must either maintain skills across multiple hyperscaler solutions or focus deeply on one, which can reinforce dependence. Skills-related policy should therefore be understood as a core component of sovereignty and institutional autonomy.

A strategy that primarily reinforces familiarity with proprietary tools risks locking both public institutions and businesses into specific vendors and outsourcing strategic control over critical digital systems. For instance, the effectiveness of strategic procurement is closely linked to internal skills and capacities. While existing procurement frameworks allow for the inclusion of qualitative and strategic criteria, these possibilities are often underused due to limited internal expertise and an increasing reliance on external consultancies. Strengthening digital capacities within public administrations is therefore essential. Without such capacity, procurement decisions risk defaulting to incumbent solutions, irrespective of long-term public interest considerations.

Similarly, a digital transformation of business that strengthens the autonomy of the infrastructures underpinning economic and social exchange requires a workforce with skills that are transferable and not dependent on proprietary ecosystems.

In conclusion, the review of the Digital Decade Policy Programme offers an opportunity to move beyond technology adoption as an end in itself and to anchor the EU's digital transformation in meaningful digital sovereignty grounded in public values. Explicitly foregrounding digital commons in the Programme can better align its ambitions with the Union's strategic priorities and ensure that digital transformation genuinely serves the interests of society.