CISPE's Feedback on the Digital Omnibus (Digital Package on Simplification)

CISPE and its Mission

CISPE (Cloud Infrastructure Services Providers in Europe) represents the voice of European cloud infrastructure service providers (CISPs) committed to contributing to a competitive, secure, and sovereign digital ecosystem for Europe. Governed by strict governance rules, CISPE's membership includes restrictions for companies not headquartered or not operating in Europe, while enabling collaboration with global providers on specific projects and activities. Therefore, we ensure that European values and principles of data protection and digital sovereignty are embedded in CISPE's members, governance, and activities.

Since its foundation in 2016, CISPE has played a pragmatic and constructive role in the European digital regulatory landscape by representing its members' interests in policy discussions and by developing practical tools to help the industry comply with EU legislation in their specific role as IaaS cloud service providers in Europe.
CISPE is the creator of the first GDPR Code of Conduct for Cloud Infrastructure Services, approved by European Data Protection Authorities.

To demonstrate its founding principles, CISPE is developing the Sovereign Cloud Label for its members and for any other cloud provider to certify services that embrace the sovereignty of solutions provided by European companies, and to promote them to the market and customers.

Through these initiatives, CISPE provides market-driven instruments that promote compliance, transparency, and accountability — transforming regulatory obligations into competitive advantages for trustworthy European providers.

The Digital Omnibus and European CISPs

CISPE welcomes the European Commission's ambition to simplify and rationalise the EU's digital rulebook through the **Digital Omnibus** and the upcoming **Digital Fitness Check**.
This initiative offers an opportunity not only to reduce administrative burdens but also to rethink how compliance with European standards and regulations is implemented, verified, and rewarded — fostering a more coherent and innovation-friendly regulatory environment.

CISPE – Cloud Infrastructure Services Providers in Europe ASBL
Avenue Louise 87, 1050 Brussels, Belgium | RPM Bruxelles 0666.662.093 | Contact: secretariat@csispe.cloud | T: 32 2 502 65 80 | Website: https://cispe.cloud | EU Transparency Register: 041495920038-44

Key Challenges for European Cloud Infrastructure Service Providers

1. Underdeveloped European “compliance tech” ecosystem

Most compliance activities by European businesses across many sectors remain manual, paper-based, and resource-intensive — not yet fit for digital efficiency.
The lack of digital tools available to European companies for mapping, verifying, and automating compliance prevents efficiency gains and cost reductions that other regulated industries have already achieved through digitalisation.

2. Compliance complexity and low visibility of compliance efforts

Compliance with European rules remains overly burdensome and insufficiently recognised or promoted by public authorities as a measure of service quality.
Companies that invest in robust compliance frameworks are not sufficiently rewarded, despite providing safer, more ethical, and more transparent services in line with EU rules and values.
This results from the limited availability of, and support for, compliance frameworks that empower companies to promote their adherence to certifications and guidance.
CISPE therefore recognises the need for market-based compliance frameworks, including labels, trust marks, and similar instruments.

3. Absence of recognised market guidance and frameworks

Unlike the CISPE GDPR Code of Conduct model, most European digital regulations lack structured compliance guidance or codes that offer the flexibility required by private law and local authorities while maintaining the high standards pursued in these regulations.
This leaves both companies and regulators without consistent reference tools to interpret, apply, and promote compliance with complex rules.

4. Cost of certification often prohibitive for SMEs

Each certification to prove compliance with European legislation (e.g. GDPR, DORA, NIS2), as well as with EU and international standards (ISO, SOC, etc.), can cost tens of thousands of euros.
Many SMEs simply cannot afford to certify against all these requirements, hindering their ability to compete — especially in public sector contracts and tender-based business opportunities.

5. Fragmented and unclear data legislation

The coexistence of multiple instruments — such as the Data Governance Act, the Free Flow of Non-Personal Data Regulation, and the Open Data Directive — generates overlaps and inconsistencies in both definitions and obligations, hindering compliance and operational implementation.
These inconsistencies create uncertainty and inefficiency, preventing cloud providers and their customers from effectively leveraging new rights to data access and sharing.

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Meanwhile, European regulators have not provided tools or frameworks to enable cloud providers to comply with all these instruments or to promote their compliance to customers.

6. Compliance silos and difficulties scaling across the European cloud market

The interaction between horizontal and sector-specific frameworks (NIS2, DORA, CRA, etc.) creates a patchwork of obligations that is difficult to navigate for compliance purposes.
Expanding into new markets or serving customers in regulated sectors often requires re-engineering internal compliance or information systems without predictability or proportionality.
This discourages cross-sector scalability and risks creating "compliance silos" in the market instead of promoting the growth and scale of European cloud providers.

CISPE's Recommendations to Simplify European Digital Rules while Promoting Compliance and Trust

To address the issues mentioned above, we recommend that the European Commission's Digital Omnibus not only simplify and streamline existing rules but also establish dedicated provisions to support the modernisation, digitalisation, and automation of compliance tools and frameworks.

Below, CISPE outlines several recommendations:

1. Digitalise compliance processes

Establish a European compliance registry and a single digital entry point allowing businesses to register and manage their compliance obligations once, with automatic recognition across all relevant digital legislations.
Many requirements — such as risk management, incident notification, or governance procedures — are duplicated across frameworks (GDPR, NIS2, DORA, CRA, etc.).
A unified system should ensure that once a company demonstrates compliance under one regulation, this status is automatically recognised across others — avoiding repeated reporting or redundant audits.
Such a registry would make compliance interoperable, measurable, and transparent, cutting costs while strengthening legal certainty, regulatory efficiency, and a level playing field between providers.

2. Recognise private certification and compliance schemes

Establish a clear legal framework for the formal recognition by public authorities of audited certifications based on market initiatives and organisations such as CISPE, including Codes of Conduct, compliance schemes, and sectoral guidance developed by industry, non-profits, and trade associations.
Such formal recognition by the European Commission would enable these market-based frameworks to serve as legitimate tools to demonstrate compliance with EU legislation.
By acknowledging and referencing these instruments, the Digital Omnibus would promote a culture of compliance under level-playing-field conditions and empower the market to value compliance as a mark of trust, safety, and ethical conduct.

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Recognised frameworks would help customers identify reliable providers, strengthen accountability across the digital ecosystem, and make compliance a genuine competitive advantage for European companies.

3. Promote compliance as a mark of quality

Integrate recognised compliance frameworks and certifications into EU tenders, funding, procurement, and standardisation programmes as requirements or added-value criteria.
This would ensure that compliance becomes not only a regulatory obligation but also a criterion of trust and quality in public and private contracting — encouraging providers to invest in higher standards and transparency.

4. Support the growth of the compliance-tech sector

Launch a "Digital Compliance Europe" initiative to fund and promote the research, development, and deployment of digital tools for compliance automation — such as cross-legislation mapping engines, conformity dashboards, and machine-readable compliance statements.
This scheme should focus on the adoption of market-developed compliance frameworks rather than creating new ones, and avoid pushing pre-defined templates on the market.
In line with the European Digital Identity Framework, such tools could enable the development of qualified trust systems by providers specialised in compliance technologies.
Supporting an EU-based compliance technology ecosystem would improve regulatory efficiency, create skilled jobs, and enable a new generation of tools that make compliance simpler, cheaper, and more accessible — especially for SMEs and emerging European providers.
This would position the EU at the forefront of a growing global industry.

5. Create a dedicated funding scheme to support SMEs with certifications

Create a funding mechanism for SMEs, start-ups, scale-ups, and innovative European companies to help them demonstrate compliance with European standards and recognised frameworks.
This funding should be available to small European businesses and cover the fair and reasonable costs of any recognised certification (up to a reasonable threshold) undertaken to demonstrate compliance with European legislation or standards.

6. Streamline and harmonise reporting obligations

CISPE supports the European Commission's ambition to establish a one-stop shop for incident and breach reporting across all digital regulations (GDPR, NIS2, DORA, CRA, etc.).
A single digital entry point should allow providers to identify, classify, and report incidents consistently, reducing duplication and administrative burden.
Harmonised templates and interoperable reporting mechanisms would improve efficiency and oversight while maintaining robust cybersecurity and accountability standards.

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Conclusion

Simplifying Europe's digital rulebook is not only about reducing complexity — it is about building trust and enabling growth through market-based innovation in compliance tools.
The Digital Omnibus should pave the way for a coherent, digital, and scalable compliance ecosystem that recognises the vital role of industry initiatives, values compliance as a differentiator, and leverages digital tools to make EU legislation more effective in practice.

CISPE and its members stand ready to support the European Commission in this process, contributing their technical expertise, operational experience, and proven compliance frameworks to ensure that simplification delivers both clarity and competitiveness for Europe's digital future.

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