



CISPE's comments on the review of the Digital Decade Policy Programme

CISPE welcomes the opportunity to comment on the Commission's Digital Decade Policy Programme. We believe that the Programme's original targets represented a useful anchor for Europe's digitalisation aspirations in 2022, but are now in need of revising to account for a changed geopolitical reality and fast technological developments. Below, we suggest a series of targets that we believe would better represent this changing landscape and the resulting increases in European digital ambition.

1. Digital infrastructure

As noted by the European Commission in the recent Call for Evidence for the upcoming Cloud and AI Development Act, there are 'problems that currently inhibit the expansion of the EU's data centre capacity', such as 'difficulties in accessing natural resources (energy, water, land), as well as complicated and slow permitting processes'.

We recommend that the ambition to reduce the length of these processes be represented in clear and measureable new targets:

- **Target 1: Permitting times for new data centres in Europe cut in half compared to the 2020 baseline**
- **Target 2: Lead times for grid extensions and new grid connections cut in half compared to the 2020 baseline**

2. Digital business transformation

The original target of 'at least 75 percent of EU enterprises use cloud, big data or AI' was a useful rule of thumb, but the technological and market developments of the last few years made it evident that there is a need for more granularity, especially to distinguish basic cloud services that should be used by basically all businesses (such as e-mail and cloud storage) from more advanced workloads not necessarily needed for all business models. Finally, in line with Europe's quest for digital sovereignty, it is crucial to reduce the dependency of European cloud customers from foreign providers.

The below targets aim to capture these changes:

- **Target 3: At least 75 percent of EU enterprises' workloads running in the cloud**
- **Target 4: At least 50 of all European enterprises' cloud workloads running on infrastructure and services certified as sovereign**
- **Target 5: At least 90 percent of SMEs using basic cloud services (e-mail, storage, collaboration tools)**

3. Digital Public Services

As noted above, Europe's digital sovereignty requires the increasing availability and usage of services that are not subject to (or are technically protected from) foreign interference. The public sector must lead the way in this regard.

- **Target 6: At least 75 percent of digital public services run on infrastructure certified as sovereign**