



Feedback to the European Commission's common digital plan towards 2030

Open Future welcomes the intention of the European Commission to outline a long-term vision for its digital policies. We believe that such a longer time horizon is of essential importance for shaping Europe's digital future.

In the following, we present three high level observations related to the roadmap document published on the 10th of February 2021. We hope that these observations can be taken into account when further developing this strategy:

1. The Commission's strategy in this area must be based on societal outcomes

The use of digital technologies cannot be an objective in itself. Similarly, European policy goals cannot be focused solely on attaining technological competitiveness. Instead digital technologies must be understood as an enabler of societal outcomes such as a more democratic and inclusive society and a more sustainable economy.

The current roadmap document is not convincing in this regard. It mixes broad societal outcomes such as economic prosperity, environmental sustainability and respect for fundamental rights and values in the digital environment with references to seemingly random technologies (high performance computing) or targets (share of EU's companies amongst the first 100 biggest disruptive innovators) that have no clear relationship with these objectives. We suggest that specific outcomes are more strongly tied to high-level societal goals.

The EU digital strategy for the next decade should be derived from the societal outcomes that it is intended to achieve. These must include a commitment to deploy digital technologies to enable a green transformation of the economy, as a means to reduce inequality and increase participation and to support democratic norms and values. The past decade has shown that such outcomes will not be realised by leaving the digital realm to market focus alone. Achieving these outcomes must be the guiding principle for the European Union's digital policy making and concrete interventions must be judged based on how they contribute to these objectives.



We see such a reorientation of digital technology to serve societal outcomes as a core mission¹ for EU policy making in the decade to come. We further believe that a mission-oriented approach would provide a much stronger model for attaining the Commission's goals than one using DESI-derived digital targets. While such targets provide a useful tool for measuring progress, they cannot on its own constitute a framework for systemic change - which is necessary for Europe to attain the stated goals.

In 2019 we published a [Vision for a Shared Digital Europe](#)². This vision outlines principles for digital policy making that can contribute to a more equitable and democratic digital environment, where basic liberties and rights are protected, where strong public institutions function in the public interest, and where people have a say in how their digital environment functions. This society-centric vision is based on four core principles that should guide the Commission's digital strategy for the coming decade. They are: Enabling Self-Determination, Cultivating the Commons, Decentralising Infrastructure and Empowering Public Institutions.

These principles should be applied to all layers of the digital space from the physical networking infrastructure to the applications and services running on top of the infrastructure and the networking stack. Likewise they should apply to the social, economic or political aspects of society undergoing digital transformation.

2. Put public digital infrastructures at the center of the strategy

A stronger focus on building public digital infrastructures needs to be a key element of achieving the Commission's goals of European digital sovereignty and an online environment that reflects European rules and values. The existing approach of leaving the development of digital infrastructure and services to the market is clearly showing its limits and while the current focus on regulating the activities of dominant market participants is welcome, it will not be sufficient to achieve the societal outcomes identified above.

The European digital strategy for the next decade should focus on ensuring that enterprises, citizens, public and civic institutions have access to alternative interoperable, standards based communication infrastructures that are not under the exclusive control of commercial entities (be they European or otherwise). Such

¹ See also Mariana Mazzucato, [Mission-Oriented Research & Innovation in the European Union](#), European Commission, Directorate-General for Research and Innovation, 2018

² See <https://shared-digital.eu/vision/>

infrastructures should cover a broad spectrum of core communication services and all levels of the online technology stack. Apart from cloud-based data storage (that the Commission rightly identifies as a core infrastructure asset) this should also include other elements that are central to today's technology landscape, such as mobile operating systems and software distribution platforms (app stores), as well as spectrum allocations that can be used as communication infrastructures.

In addition, the Commission's digital strategy for the coming decade should further develop the digital capacity of public institutions such as cultural heritage institutions, public service media organisations, academic and educational institutions. Together with civic and commons-based initiatives, these organisations should be enabled to build public infrastructures that reflect the civic and public values underpinning our democratic societies³.

3. Digital rights must include access rights

We welcome the fact that the roadmap document puts a lot of emphasis on the respect for fundamental rights as a pillar for the European digital space. When implementing this objective by drafting the proposed Charter of Digital principles at the service of people, the Commission should take into account all types of individual rights. While rights related to privacy and data protection have been at the center of recent EU level policy initiatives, it is more important than ever to include rights concerning access to information and culture in the scope of this objective. In general, collective rights need to be considered alongside individual rights, and the latter should be seen as relational.

Barriers to access to information and culture must be further removed in order to fully realize the potential of the digital transformation to serve as a means to reduce inequality, to increase participation, and to shape a more democratic and inclusive society. While citizens across the European Union enjoy the same level of protection when it comes to personal data and privacy, this is not the case when it comes to access to information and culture. To give just one example, the user rights conferred by exceptions and limitations to copyright and other intellectual property rights remain fragmented and public institutions such as educational and cultural heritage institutions still struggle to fully make use of the opportunities that digital technologies bring when it comes to fulfill their missions. The European digital strategy for the next decade must address these shortcomings.

³ See also [Interoperability with a Purpose](#), Paul Keller and Alek Tarkowski (2020)