

CSC's feedback on the call for evidence for the review of the Digital Decade policy programme

EU's Digital Decade targets must be updated to support tech and data sovereignty

CSC agrees with the need to review the Digital Decade targets and objectives considering the technological and geopolitical developments since the adoption of the Digital Decade policy programme in 2022. In this time and age, the programme must be tied even more closely to advancing Europe's technological sovereignty as well as data sovereignty. European competitiveness goes hand in hand with technological sovereignty through reducing dependencies, strengthening Europe's own capabilities and improving market access for European companies. In a world where digital services are dominated by few non-European players, it is crucial for Europe to support building its own capabilities.

Strong European RDI and skills development are elementary for addressing the challenge of supporting digital transformation throughout the society. Therefore, the need for multidisciplinary skills development must be better reflected in the Digital Decade policy programme. Considering the high energy consumption of the digital infrastructures supporting AI and other data-driven operations, sustainability considerations must also be brought into the scope of the programme.

High-quality data for ethical AI and European innovation

To bring the Digital Decade policy programme up to speed with the AI revolution that has happened since its adoption, *data* as the raw material for value creation must be brought into its scope and spotlight. Europe's success in AI will depend largely on its ability to provide AI developers with the data they need to train their models. High-quality data also needs to be available for RDI projects that have potential for all types of scientific breakthroughs or industrial innovation, and it needs to be available for European companies and governments. This requires making sure that European data is kept in European ownership and used for value creation in Europe.

A recent study by EBU¹ found that 45% of all AI responses had at least one significant issue such as false information, incorrect sources or opinions disguised as facts. We have seen examples of digital platforms being used as channels for spreading misinformation and disinformation. This is not only dangerous for European values and democracy, but also for the competitiveness of European companies in the digital domain. As an AI continent, Europe must counter-balance the current dominant closed,

¹ https://www.ebu.ch/Report/MIS-BBC/NI_AI_2025.pdf



untransparent and possibly biased AI models. Europe must be bold in developing a European AI that is trustworthy, responsible, ethical and sustainable. This must be supported by the Digital Decade policy programme setting targets to ensure that data used for training AI models must be of high quality, open and transparent.

Data infrastructures for strategic autonomy

Currently Europe is dependent on non-European platforms when it comes to storing and accessing data. To tackle this, stronger ecosystem thinking and long-term planning is needed for developing infrastructures for high-performance computing (HPC), data, AI and quantum in a coherent way, for example within the context of EuroHPC. To support this, the Digital Decade policy programme must set targets for developing the necessary data infrastructures e.g. as a part of the above-mentioned EuroHPC framework. The Digital Decade programme must align with ongoing parallel initiatives in the digital domain, and these infrastructures must be based on and made interoperable with existing pan-European data infrastructures, to avoid fragmentation.

Furthermore, the goal set in the AI Continent Action Plan to triple the EU's data centre capacity within the next five to seven years must also be incorporated into the Digital Decade targets. Similar targets should also be developed for measuring the impact of the common European data spaces and the upcoming AI Factory Data Labs, reflecting both the quantity and the quality of the data made available via these platforms.

A key piece of the European data landscape is a European Web Data Infrastructure that provides European start-ups, SMEs and industry with large-scale access to high-quality web data. Large-scale and systematic access to web data is today mainly controlled by US-based Big Tech companies, leaving Europe dependent on their services and data that is closed, untransparent and possibly biased. This is disastrous for Europe's economy, democracy and rule of law. To remedy this, a European Web Data Infrastructure must be developed along with a dedicated Digital Decade target measuring the progress towards this goal. Funding for this infrastructure as well as a related R&D scheme must be ensured, with due attention also to the regulatory framework from the perspective of availability of open, transparent and non-biased web data for boosting European economy and strengthening democracy.

A European public web data infrastructure is forecasted to bring substantial benefits, estimating a total of 4 - 5 billion € in accrued net benefits over a decade and by year five of its maintenance, it is projected to produce annual net benefirs between 400 and 500 M€. This economic valuation considers direct financial impacts from operational activities and indirect benefits that include enhanced economic efficiency and bolstered European competitiveness in the global tech industry. Indirect impacts would



significantly enhance European digital sovereignty, promoting a more balanced and open digital ecosystem.²

Multidisciplinary skills to fuel the digital transformation

Skills development has been a key part of the Digital Decade policy programme from the beginning and must remain so. Developing AI requires constant development of competencies through educational structures but also through R&D activities, and Europe must aim to be the most attractive place for AI research. Now, that Europe has some of the world's most powerful tools for this purpose – the AI Factories – the momentum is there, and continuation for pan-European supercomputers and related data infrastructures must be ensured.

The skills development targets of the Digital Decade must be developed further to reflect the systemic nature of digital transformation. Instead of only focusing on basic and specialist digital skills, a target must be set for measuring the understanding of the implications of digital transformation across sectors in order to ensure multidisciplinary understanding on how this transformation affects societies and what kind of skills are required in the future.

Sustainability for the Digital Decade and beyond

When the Digital Decade policy programme was first adopted, sustainability was mentioned as a topic to be revisited during the 2026 review of the programme. Considering the major environmental impact of AI's electricity consumption, this idea has by no means lost its relevance. The European AI Continent must be built on a sustainable basis to ensure its long-term feasibility. Therefore, a new Digital Decade target to ensure sustainable operations of digital infrastructures would be most welcome. Here, the European sustainability rating scheme for data centres could be used as a starting point although it must be developed further to cover the entire lifecycle of a data centre, including the construction phase where significant sustainability gains can be made using brownfield sites instead of greenfield ones.

CSC - IT Center for Science

Kimmo Koski
Managing Director

Irina Kupiainen
Director of EU Affairs, Policy and Business Development

² <https://openwebsearch.eu/wp-content/uploads/2024/09/MarketAssessmentOfOWI-Report-V1.pdf>