

Feedback on the Proposal for a Regulation of the European Parliament and of the Council establishing the Digital Europe programme for the period 2021-2027

The process of developing the Digital Europe Programme

As a general remark, CSC finds the aim and ambition of the Digital Europe programme very relevant, and we recognize the need to increase and maximise the benefits of the digital transformation for all European citizens, public administrations and businesses. However, the process of developing the Digital Europe Programme (DEP) has not been transparent or inclusive enough. No public consultation was done for the programme as a whole, only for separate parts, with no indication of how these parts would be put together as a full programme. The negative opinion on the first impact assessment from the regulatory scrutiny board indicates that this programme was set up in a hurry. Even the opinion on the second impact assessment has serious reservations, questioning for instance the commitment of member states and the role of DEP related to research. The key objective, which should form the ground for all the other objectives, is to build trust and collaboration between the different stakeholders, to make efficient use of relevant existing work and to aim for interoperability and synergies, avoiding a siloed approach.

Synergies with Horizon Europe and other programmes

The description of the coordination between DEP and Horizon Europe, especially in the HPC area should be developed further. The difference between programmes is clearly described, but the potential synergies are rather vague. It is still not very clear how the interoperability issue is handled, and there is no mentioning of interoperability of the infrastructures in the different sectors (public-industry-research). Interoperability of data across all the infrastructures is a key factor for enabling innovation and should be highlighted more. The mentioning of alignment with European Interoperability Framework (EIF) is very good but the importance of all the aspects of interoperability should be elaborated (not only technical but also semantic, legal, organizational etc), and should be widened to apply to all European data infrastructures. Existing initiatives such as the DSM and the Data Economy must be taken into account to ensure there are no incoherencies - especially as data is a key element in digitalisation. Additionally, continuous assessment of relevant legislation should happen in parallel, to avoid building more barriers.

Performance indicators

The performance indicators for the five specific objectives of the programme are quite basic and very much focused on quantity. Especially in the HPC area, the focus seems to be about numbers of machines, rather than quality and what we aim to actually get out of the machines. As for the digital skills, it is positive that this objective is acknowledged, but the performance indicators should include discipline-specific digital skills and more quality-oriented indicators.

Digital Innovation Hubs

The Digital Innovation Hubs (DIHs) have a very central role in the implementation of the programme,

with the aim to stimulate the broad adoption of advanced digital technologies by industry, by public organisations and academia. Similar to other EU “innovation-labeled” instruments and programmes (such as the European Innovation Council in Horizon Europe) it is difficult to understand the full picture of the actual work done by the DIHs. The variety and number of activities mentioned as part of the responsibility of the DIHs indicate that there may be too high expectations on the role and capacity of these hubs. How will the DIH in practice attract for instance companies?

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