

Key Recommendations to the Danish EU Presidency

Denmark's role in shaping the EU's digital future

Denmark holds the Presidency of the Council of the European Union from 1 July to 31 December 2025, steering negotiations on important EU tech and digital files. The Computer & Communications Industry Association (CCIA Europe) respectfully offers these 11 key recommendations and looks forward to supporting the Danish EU Presidency.

I. Drive innovation-friendly new legislation

For the EU to remain competitive, it must adopt evidence-based policies that foster innovation and encourage adoption of technology. Upcoming legislation, such as the Digital Networks Act, should prioritise investment and flexibility, putting consumers at the forefront.

Recommendations

1. Break down regulatory barriers for a more competitive EU economy
2. Shape the Digital Networks Act to put consumer interests first
3. Ensure better enforcement coordination in EU consumer law revisions
4. Advance much-needed patent reforms to support digitalisation

II. Deliver consistent EU laws and stable implementation

To unlock the full potential of artificial intelligence (AI) and other emerging technologies, the EU must ensure coherent implementation of its digital policies. New tech legislation must align with existing frameworks to create a stable regulatory environment.

Recommendations

5. Leverage AI for competitiveness and simplify rules so Europe can lead
6. Maintain consistency with the EU's data protection framework
7. Embrace digital technology in sustainability policies
8. Strive for a harmonised, forward-thinking approach to minor protection

III. Finalise pending initiatives for legal certainty

Ensuring legal certainty requires the prompt finalisation of key laws. Enforcement must be harmonised while preserving essential safeguards. For instance, finance and payment rules should enable fairness and innovation, while audiovisual policies require careful review.

Recommendations

9. Carefully evaluate the EU's current audiovisual rules
10. Enable effective tech solutions without compromising essential safeguards
11. Ensure fairness and innovation in the EU's payment and finance sectors

I. Drive innovation-friendly new legislation

For the EU to remain competitive, it must adopt evidence-based policies that foster innovation and encourage adoption of technology. Upcoming legislation, such as the Digital Networks Act, should prioritise investment and flexibility, putting consumers at the forefront.

1. Break down regulatory barriers for a more competitive EU economy

The Danish EU Presidency has a crucial opportunity to champion regulatory simplification and strengthen Europe's competitiveness. Instead of adding new layers of legislation, the focus should be on making existing rules more effective. This includes removing barriers at the national level and ensuring consistent implementation across the 27 EU Member States to create a truly harmonised Digital Single Market.

Currently, market fragmentation still prevents digital firms from scaling up and undermines Europe's ability to compete globally. A renewed commitment to Better Regulation – grounded in transparency, thorough impact assessments, and consistency – is essential. This approach will make EU policies more predictable, innovation-friendly, and suitable for today's fast-paced digital world. At the same time, the EU must prioritise open digital trade and international cooperation. Mutual recognition of standards and the reduction of compliance costs should be central to Europe's relationship with key trading partners.

When trade disputes arise, EU countermeasures should not distort this long-term policy direction. The need to foster competitiveness, attract investment, and enable firms to scale up (both in Europe and globally) must take precedence. Avoiding isolationism – including broad 'Buy European' measures or investment screening rules that create artificial barriers for technologies and investments from outside the EU – is crucial to ensuring a competitive and innovative digital economy, and should be a key priority of Denmark's Presidency.

2. Shape the Digital Networks Act to put consumer interests first

With the European Commission's proposal for a Digital Networks Act (DNA) expected by year-end, the Danish EU Presidency has a unique chance to guide its development in the right direction. The DNA should be a forward-looking piece of legislation that focuses on accelerating the adoption of critical digital technologies, such as cloud computing and artificial intelligence, in line with the EU's Digital Decade targets set for the year 2030.

Denmark must ensure the DNA is evidence-driven and addresses real-world challenges, including stimulating consumer and business demand, and bridging the connectivity gap in rural and remote areas in an effective way. Rather than converging, the telecom and cloud industries provide different services that support – but do not substitute for – one another. Hence, the Danish EU Presidency should aim for a regulatory approach to the reform of telecom rules that reflects the very distinct roles of the tech and telecom sectors.

Similarly, the idea to use the DNA to introduce a dispute resolution mechanism in the IP interconnection market should be rejected, as it would amount to network usage fees. This would only raise the cost of digital services, slow technology deployment, and reduce EU competitiveness. The Presidency has to ensure the DNA remains grounded in net neutrality.

3. Ensure better enforcement coordination in EU consumer law revisions

Under the Danish Presidency, the revision of the Consumer Protection Cooperation (CPC) Regulation should be a priority to ensure consumers benefit fully from existing EU protections. Rather than creating new laws, the focus should be on more consistent enforcement of existing ones and clarifying how they apply. This includes the Digital Services Act (DSA), Digital Markets Act (DMA), Product Liability Directive (PLD), General Product Safety Regulation (GPSR), and the AI Act.

Prematurely revising consumer law would lead to fragmentation, legal uncertainty, and added complexity for business. The Digital Fairness Act (DFA) should be postponed until we fully understand how the existing digital framework is functioning, especially following the recent implementation of the DSA and AI Act. With the Commission set to commence its DFA impact assessment in the second half of 2025, Denmark should advocate for regulatory coherence and stronger enforcement before pursuing new legislation.

Indeed, many of the issues identified in the Commission's 'digital fairness' fitness check of late 2024 (deceptive design, personalisation, influencer marketing, addictive design, contract cancellation, etc) are already covered by existing EU laws. The EU cannot claim to promote competitiveness and regulatory simplification while rushing to overhaul consumer law at the same time. Ensuring that 'what is legal offline is legal online' remains critical to supporting both consumers and businesses in a fair, innovation-friendly environment.

4. Advance much-needed patent reforms to support digitalisation

The proposed Regulation on Standard Essential Patents (SEPs) should be put back on the agenda, and subsequently fast-tracked, under the Danish EU Presidency. This Regulation aims to remove barriers for companies by streamlining SEP licensing and addressing inefficiencies and abuses – ultimately lowering costs for firms that must comply with industry standards. The European Parliament has already strongly supported the SEP Regulation, and the Council should now work towards finalising its position.

Denmark should also push for an update to the IP Enforcement Directive to reflect proportionality in patent injunctions. Currently, EU courts are exploited by non-innovating entities that use excessive patent claims to extract high fees from real innovators by threatening market exclusion through automatic injunctions. This practice undermines European competitiveness and restricts consumer access to innovative products. A more balanced approach is needed to safeguard Europe's patent protection system.

II. Deliver consistent EU laws and stable implementation

To unlock the full potential of artificial intelligence (AI) and other emerging technologies, the EU must ensure coherent implementation of its digital policies. New tech legislation must align with existing frameworks to create a stable regulatory environment.

5. Leverage AI for competitiveness and simplify rules so Europe can lead

The EU needs to implement the AI Act in a way that drives innovation, not stifles it. The Danish Presidency can take the lead by coordinating with EU institutions to transform

Europe into an AI powerhouse. This includes boosting investments in AI infrastructure, the broader ecosystem, and making Europe an attractive destination for private investment. Clarity is key, which is why ambitious efforts to simplify Europe's AI rules are needed.

The AI Act must also work alongside the General Data Protection Regulation (GDPR) and other EU rules without creating confusion or regulatory overlap. Ensuring that the code of practice for general-purpose AI (GPAI) providers offers clear, practical guidance – in practice, and not just on paper – will be a crucial first step in fostering innovation. Finally, preserving the Copyright Directive's delicate balance for AI model training is essential for EU competitiveness.

6. Maintain consistency with the EU's data protection framework

As new EU digital rules continue to emerge, maintaining consistency and uniformity with the General Data Protection Regulation (GDPR) is essential. The GDPR was deliberately designed with flexibility in mind, enabling it to adapt to technological advancements.

The Danish EU Presidency should guard against overly restrictive interpretations of privacy rules that create legal uncertainty and hamper innovation. Policymakers and regulators (often newly established) must ensure that their guidance aligns with the GDPR to avoid undermining its effectiveness. This will help maintain a stable and predictable environment for businesses and consumers alike.

7. Embrace digital technology in sustainability policies

Digital technologies are vital to achieving Green Deal goals and enhancing EU global competitiveness. By optimising resource efficiency and supporting the circular economy, digital tools can help tackle climate change, cut emissions, and drive sustainable growth. They provide scalable solutions for Europe's green transition. In order to maximise this potential, the EU needs an innovation-friendly regulatory framework, clear legal requirements, and aligned policies that balance sustainability and competitiveness.

The Danish Presidency should focus on leveraging digital tools for climate action, such as fostering AI-driven sustainability solutions, improving data centre operations, and supporting clean tech like smart grids to reduce energy costs.

Properly applied, digital solutions can enhance transparency and traceability throughout a product's lifecycle. The Digital Product Passport (DPP) should be developed with business needs in mind, simplifying compliance with sustainability regulations. It is important to ensure flexibility in using various formats, such as QR codes, barcodes, and smart labels.

Regulatory coherence is also critical to advancing circular economy initiatives, streamlining environmental claims verification, and establishing practical sustainability reporting standards. In sectors like transport and energy, Denmark should push for policies that incentivise battery innovations, clean mobility, and grid modernisation.

8. Strive for a harmonised, forward-thinking approach to minor protection

As the EU debates how to ensure the online safety, privacy, and security of minors, a unified approach is crucial to avoid fragmented, inconsistent policies. The Danish Presidency should champion a balanced, risk-based strategy to ensure age-appropriate design across

different online services – considering their functionalities, intended audience, and risks. Services with a higher risk to minors should face stricter standards, ensuring that protection measures are proportionate and future-proof.

The Digital Services Act (DSA) already sets a comprehensive framework for online safety, and further requirements should be avoided unless absolutely necessary. In light of some Member States' plans to adopt divergent approaches to age-appropriate digital services and age-assurance mechanisms, the Danish EU Presidency should ensure these countries do not exceed the requirements in the DSA and the Audiovisual Media Services Directive.

Denmark should also promote a uniform implementation of the European digital identity framework (eIDAS Regulation), ensuring that digital wallets are interoperable and work seamlessly across the EU. While the Commission's work on harmonisation of digital means of identification is progressing, further efforts are needed to ensure full uptake and effectiveness (for age-assurance applications and beyond).

III. Finalise pending initiatives for legal certainty

Ensuring legal certainty requires the prompt finalisation of key laws. Enforcement must be harmonised while preserving essential safeguards. For instance, finance and payment rules should enable fairness and innovation, while audiovisual policies require careful review.

9. Carefully evaluate the EU's current audiovisual rules

The Danish Presidency should advocate for regulatory stability in the audiovisual sector, prioritising enforcement over reopening the Audiovisual Media Services Directive (AVMSD). The current framework is robust: protecting consumers, regulating video-sharing platforms (VSPs), and ensuring access to European content. Focus should be on improving implementation of these existing rules, particularly through better enforcement of the country-of-origin principle and regulatory coherence with the Digital Services Act (DSA).

Prematurely revising the AVMSD would increase regulatory uncertainty, raise compliance burdens, and disrupt cross-border content distribution – stifling investment and innovation. With the European Commission's AVMSD evaluation already underway, Denmark must now ensure policy discussions are evidence-based and do not preempt the findings.

Indeed, it is crucial to avoid expanding obligations on VSPs or introducing new financial and prominence requirements that could harm competition, reduce consumer choice, and fragment the Single Market. Rather than revisiting well-established principles, the focus should be on strengthening enforcement and allowing the existing AVMSD framework to operate effectively before considering legislative interventions.

10. Enable effective tech solutions without compromising essential safeguards

Several legislative proposals from the 2019-2024 mandate are still pending, notably the proposed Regulation to prevent and combat child sexual abuse (CSA) and the proposal to improve procedural rules for enforcement of the General Data Protection Regulation (GDPR). With negotiations ongoing, it is crucial to ensure these regulations are both effective and grounded in the realities of the digital industry.

There is broad industry commitment to protecting minors from CSA online. While this is critical, it's equally important to strike the right balance between child protection and safeguarding fundamental rights, such as privacy. A proactive approach that allows online services to continue with the detection, removal, and reporting of CSA cases remains key.

For GDPR enforcement in cross-border cases, co-legislators must prioritise maintaining the one-stop-shop mechanism, which is fundamental to the data protection framework. Any agreement should focus on streamlining cross-border complaints rather than introducing additional complexity. The Danish Presidency should also insist on the introduction of a redress mechanism for decisions taken by the European Data Protection Board (EDPB).

11. Ensure fairness and innovation in the EU's payment and finance sectors

The Financial Data Access (FiDA) Regulation was originally proposed to benefit the EU economy and empower consumers by giving them greater control over their data. However, provisions that discriminate against certain actors were introduced by co-legislators, which now risk creating an uneven playing field, stifling innovation, and disempowering consumers. Specifically, provisions targeting so-called 'gatekeepers' under the Digital Markets Act (DMA) should be rejected, as they would reinforce the monopoly of financial institutions – this sector's true gatekeepers – over financial data, while undermining consumers' control, an essential element of EU privacy laws.

The proposal to automatically allocate liability for impersonation fraud in the Payment Services Regulation (PSR) is also highly problematic. It could incentivise fraud by creating a 'honeypot' effect that attracts bad actors, as seen in other jurisdictions.¹ Instead of focusing on ineffective liability schemes and creating tensions with the Digital Services Act and privacy rules, the Danish EU Presidency should push for a collaborative, whole-of-society approach to tackle fraud and scams – fostering cooperation among banks, payment service providers, telecommunications companies, and online platforms.

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

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¹Is the EU taking the right approach to APP fraud?, Zach Meyers, 12 November 2024, available [here](#).