

## Key Recommendations to the Irish EU Council Presidency

# Securing Europe's digital edge with Ireland

Ireland holds the Presidency of the Council of the European Union from July to December 2026 – steering negotiations on key digital and sustainability files. The Presidency has a unique opportunity to move beyond abstract discussions and deliver concrete actions that strengthen the EU's global competitiveness, advance digital innovation, and boost infrastructure rollout, while upholding security, trust, and fundamental rights. The Computer & Communications Industry Association (CCIA Europe) is pleased to share these 12 recommendations and looks forward to supporting the Irish EU Presidency in its efforts.

## I. Championing an open and competitive EU digital market

### 1. Digital Omnibus – Deliver meaningful regulatory simplification

To ensure the Digital Omnibus really delivers simplification on the ground, rather than becoming a mere 'box-ticking' exercise, the Irish Presidency must rigorously filter out new complexities. Most notably, this includes legally flawed and confusing browser-level consent mandates. The Council should instead ground the proposal in operational realities: backing the Commission's modest improvements to the data protection framework, while securing long-awaited clarifications on automated decision-making.

By strictly aligning these simplified rules with recent data-protection case law and interpretations related to AI training, the Presidency can provide the regulatory coherence and legal certainty that tech companies of all sizes – large and small, across many different sectors – require to compete and innovate.

### 2. Market access – Uphold openness, customer choice, and competitiveness

Any unjustified, blanket discrimination against non-European providers in public procurement – such as narrow 'made in Europe' criteria – risks undermining the principle of ensuring that EU taxpayers receive the highest quality at the best price, as well as violating the EU's trade commitments, such as the WTO Government Procurement Agreement.

Beyond procurement, maintaining market openness is crucial not only for Europe's digitalisation but also for achieving the Green Deal and circular economy objectives, which depend on access to advanced recycling and reuse innovations, regardless of their origin. Last but not least, discriminatory exclusions – such as those recently seen in the Financial Data Access (FiDA) Regulation against 'gatekeepers' under the Digital Markets Act – undermine competition and limit consumer choice. CCIA Europe urges the Irish Presidency to place the integrity of the Single Market at the centre of the debate – rejecting blanket restrictions that weaken security, increase costs for taxpayers, and hinder innovation.

### 3. Open internet – Preserve net neutrality in the Digital Networks Act

The Irish Presidency should ensure that the Digital Networks Act (DNA) remains grounded in rigorous evidence, both during negotiations and when subject to future reviews. The Council should reject heavy-handed interventions or unwarranted 'conciliatory' mechanisms that threaten net neutrality by serving as a backdoor for telecom operators to

demand network usage fees. We urge the Presidency to recognise the European connectivity ecosystem as a collaborative, competitive, and well-functioning market, and defend it against measures that would harm consumers and disrupt digital trade.

Crucially, legacy telecom obligations should remain strictly limited to traditional network operators – namely those that control the critical ‘last-mile’ infrastructure (connecting individual end users to the internet). These telecom operators hold an inherent terminating monopoly over end-user access, which has historically justified targeted, sector-specific regulation. By contrast, the Irish Presidency should advocate for the explicit exclusion of content delivery networks (CDNs) and private networks from the DNA, as they function as specialised performance overlays rather than public telecom services.

## II. Modernising key EU rules to accelerate innovation

### 4. Cybersecurity – Advocate for technical principles instead of political ones

The Cybersecurity Act (CSA) revision must remain a technical and risk-based exercise, particularly concerning the European Cybersecurity Certification Framework. Greater legal certainty and Member State cooperation on the designation of ‘high-risk’ vendors and countries should be favoured to strengthen security while preserving market openness.

Ireland should advocate for a transparent and inclusive certification process – based on meaningful technical and organisational security controls, rather than politically motivated criteria – and ensure that ICT supply-chain security measures balance Member States’ national security with unambiguous mitigation measures.

### 5. Patents – Modernise rules for innovators

European innovation is being stifled as the Directive on the Enforcement of Intellectual Property Rights (IPRED) fails to shield innovators from abusive patent litigation. It increasingly allows for automatic injunctions that disregard proportionality, forcing firms into inflated settlements just to keep their products on the European market.

Businesses also face unpredictable licensing costs for standards essential patents (SEPs) and the constant threat of litigation – especially for standardised technologies like 5G or WiFi – making the EU a global outlier. To reverse this, patent rules need to be modernised through a targeted reform of the IPRED to enforce strict proportionality and transparent licensing, shifting the market’s focus from courtroom battles back to product development.

### 6. Sustainable digitalisation – Turn green rules into market opportunities

To prevent upcoming sustainability legislation from further fragmentating the Single Market, the Irish Presidency should champion harmonisation, including through a genuinely unified EU market for waste and secondary materials, which currently remains divided into 27 separate national markets.

We encourage Ireland to treat the forthcoming sustainability Omnibuses not merely as technical updates, but as strategic instruments to correct misalignment and reduce red tape. This includes fixing unworkable timelines, such as the urgent need to ‘stop the clock’ on battery replaceability, and promoting digital labelling solutions over physical paperwork.

### III. Fostering stability, simplification, and coherence

#### 7. Simplification – Prioritise enforcement and preempt overlaps

The Irish Presidency should promote regulatory coherence by prioritising the consistent implementation of landmark, existing EU laws – such as the Digital Services Act (DSA), General Data Protection Regulation (GDPR), and the AI Act – and rules governing physical products and services, including those on deliveries and product safety. New measures should only be considered when substantial, measurable gaps are identified.

Layering premature, one-size-fits-all regulations atop the already complex regulatory framework would contradict the EU’s simplification agenda. Instead of creating even more compliance burdens and legal uncertainty, the Irish Presidency (together with Member States and the European Commission) should focus on implementing and enforcing existing rules – with a view to ensuring they are effective, properly implemented, and harmonised – before even considering introducing new legislation. Think, for example, of the Audiovisual Media Services Directive (AVMSD) and the Product Liability Directive.

#### 8. Digital Markets Act (DMA) – Favour regulatory stability

The upcoming DMA review should be firmly grounded in market evidence. Indeed, the primary goal should be mitigating (unintended) negative consequences, such as consumer frustration and delayed product launches.

Rather than extending the regulation to innovative, highly competitive sectors like AI (at the risk of further eroding Europe’s competitiveness) the focus should be on addressing existing procedural issues to make the DMA truly workable. This means increasing transparency, clarifying enforcement procedures, and considering more balanced models – such as entrusting DMA enforcement to a neutral, independent authority.

#### 9. AI Omnibus & copyright – Prioritise regulatory simplification

Ireland should build on previous efforts to ensure that regulatory simplification remains the guiding principle for AI Act implementation. In this context, the AI Omnibus presents a crucial opportunity to ease the regulatory burden on businesses across the EU, while boosting innovation and competitiveness in the AI market. This should include realistic compliance deadlines, streamlined and flexible enforcement, and robust simplification.

Simultaneously, the Irish Presidency should support discussions to preserve the existing Copyright Directive, as it already strikes the right balance between innovation and intellectual property protection. Maintaining this stability will be particularly important for increasing the availability of AI in the EU, as well as for nurturing dynamic and competitive AI markets underpinned by legal certainty, continuity, and flexibility.

## IV. Upholding trust, rights, and stable taxation

### 10. Data retention – Protect rights, ensure proportionality

The Council Presidency must strive to ensure a balanced and proportionate approach to data retention rules by introducing a set of clearly defined, evidence-based obligations that are limited and proportionate (for example, for the investigation of serious crimes).

Any future data retention proposal, including those steered by the Irish Presidency, must uphold strong safeguards for fundamental rights, cybersecurity, and encryption.

### 11. Child safety – Promote safety by design

Rather than opting for blanket age-based restrictions that differ between Member States, the Presidency should focus on proportionate, risk-based measures to protect minors on the internet. Overly broad prohibitions not only limit valuable experiences but also raise major concerns regarding the fundamental rights to freedom of expression and information.

By way of principle, landmark legislations like the Digital Services Act (DSA) and the Audiovisual Media Services Directive (AVMSD) should always take precedence over fragmented and diverging national initiatives on age assurance. A key victory for the Presidency would be securing the uniform implementation of the European Digital Identity (eIDAS) – providing a seamless, cross-border solution for age verification.

### 12. Taxation – Promote non-discrimination and consistent administration

The Irish Presidency should promote a long-term, stable international tax system that fosters business certainty and economic growth in the EU. Unilateral tax measures – such as Digital Service Taxes (DSTs) that discriminate based on nationality or industry – distort economic activity, result in multiple taxation of the same income, and conflict with established international tax principles. They can also heighten geopolitical tensions.

More broadly, under the Irish Presidency, tax administration should follow a consistent and good-faith application of EU tax laws across all Member States, including in cases of incorrect VAT application when digital platforms provide services to users.

## 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.

Visit [ccianet.eu](https://ccianet.eu), [x.com/CCIAEurope](https://x.com/CCIAEurope), or [linkedin.com/showcase/cciaeurope](https://linkedin.com/showcase/cciaeurope) to learn more.

### For more information, please contact:

CCIA Europe's Head of Communications, Kasper Peters: [kpeters@ccianet.org](mailto:kpeters@ccianet.org)