

BRUSSELS, 11 JUNE 2026

Europe should not rush weak solutions and miss out on real simplification of the digital framework

Dear Member States representatives,

Europe is preparing to enhance and secure its technological sovereignty,¹ and simplification has rightfully been identified as a key driver: Member States should not pass on pursuing a leaner data framework.

The Digital Omnibus is one of the most powerful tools the co-legislators have at their disposal to ensure a competitive regulatory and business environment. It is an opportunity to 1) boost data-driven innovations, 2) resolve any uncertainty on data protection, notably in AI training and development, as well as 3) harmonise cybersecurity reporting between CRA, NIS2, the GDPR, DORA and other laws.

First, the Data Act requires businesses to hand over proprietary and sensitive operational data to third parties, including to competitors in Europe and abroad. The Commission estimated **€235 million/year** in compliance costs, **plus €410 million** in one-off costs for manufacturers.² Instead, we recommend that the omnibus **supports voluntary data sharing frameworks**, that protect data.

Second, on top of estimates of over **€10 million GDPR compliance costs per large organisation in Europe**,³ companies wanting to **train, develop or apply AI** to stay competitive face uncertainty as to the data they can use and how to protect it. Clarifying GDPR legal bases, scientific research data, and fraud prevention is essential to support companies that have been on the frontline of privacy compliance these past ten years.

Third, NIS2 and CRA combined are estimated to cost industry at least **€60.2 billion**, making this a heavy weight on European competitiveness. While common NIS2 reporting templates⁴ may alleviate some of the burden of overlapping incident reporting obligations, the Digital Omnibus fails to address the real pain points: harmonised timelines and threshold for incident reports, a genuinely single point of reporting, and a simplified Cyber Resilience Act.

The European Parliament has given itself until February 2027 to fully develop and adopt a position. We call on Council to conduct a thorough procedure as well, with **sufficient time for reflection instead of rushing through half measures**. This is the only way to ensure a real strengthening of Europe's framework for data. The accelerated timeline from the Council Presidency does not add value as trilogues would in any event only be able to start once the European Parliament have finished their position.

Yours sincerely,

¹ See 'Horizontal Enablers' in the Commission's communication on the Tech Sovereignty Package, COM(2026) 503 final, 3 June 2026.

² Commission impact assessment, 2022, <https://digital-strategy.ec.europa.eu/en/library/impact-assessment-report-and-support-studies-accompanying-proposal-data-act>

³ See Draghi report on competitiveness, https://commission.europa.eu/topics/competitiveness/draghi-report_en.

⁴ For more information available at: <https://digital-strategy.ec.europa.eu/en/news/nis2-cooperation-group-adopts-common-templates-incident-reporting>



AAVIT – [Association of the Czech ICT Industry](#) (Czechia)

Adigital – [Asociación Española de la Economía Digital](#) (Spain)

AFNUM – [Alliance Française des Industries du Numérique](#) (France)

Agoria – [Belgian Federation for the Technology Industry](#) (Belgium)

Ametic – [Spanish Multisector Association of Electronics, Information and Communication Technologies, Telecommunications, and Digital Content Companies](#) (Spain)

APPLiA – [Home Appliance Europe](#) (EU)

COCIR – [European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry](#) (EU)

Dansk Erhverv – [Danish Chamber of Commerce](#) (Denmark)

DEIK – [Dış Ekonomik İlişkiler Kurulu](#) (Turkey)

DIGITALEUROPE – [Representing digitally transforming industries in Europe](#) (EU)

EFPIA – [European Federation of Pharmaceutical Industries and Associations](#) (EU)

EK – [Confederation of Finnish Industries](#) (Finland)

Eurofinas – [European Federation of Finance House Associations](#) (EU)

GZS – [Chamber of Commerce and Industry of Slovenia](#) (Slovenia)

INFOBALT – [Infobalt Association](#) (Lithuania)

ITAS – [IT Asociácia Slovenska](#) (Slovakia)

ITL – [Association of Information Technology and Telecommunications](#) (Estonia)

IVSZ – [Hungarian Association of Digital Companies](#) (Hungary)

LightingEurope – [The voice of the Lighting Industry](#) (EU)

MedTech Europe – [From diagnosis to cure](#) (EU)

NLdigital – [NLdigital Association](#) (Netherlands)

PIIT – [Polska Izba Informatyki i Telekomunikacji](#) (Poland)

SECIMAVI – [L'organisation professionnelle représentative de l'électronique grand public](#) (France)

Technology Ireland (Ibec) – [The Irish technology sector](#) (Ireland)

TechSverige – [TechSverige Association](#) (Sweden)

techUK – [The UK's technology trade Association](#) (United Kingdom)

Teknikföretagen – [Technology Industries of Sweden](#) (Sweden)

TIF – [Technology Industries of Finland](#) (Finland)

ZVEI – [German Electro and Digital Industry Association](#) (Germany)

Związek Cyfrowa Polska – [Digital Poland Association](#) (Poland)