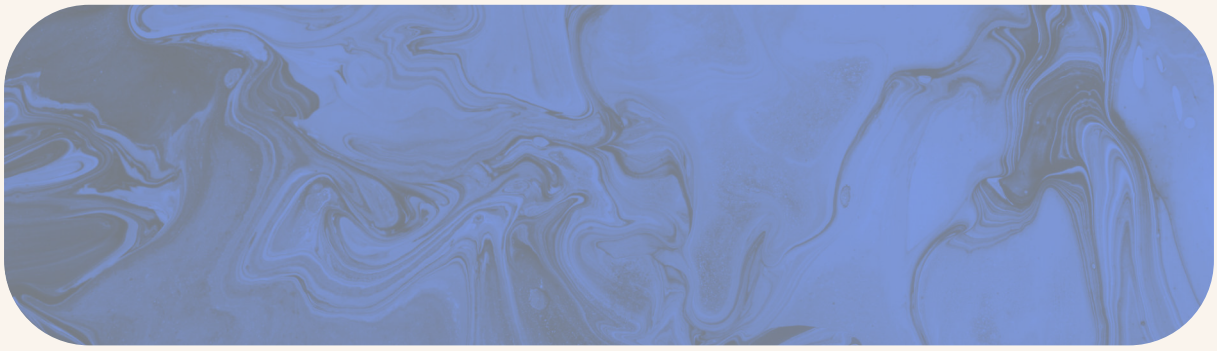
Digital Public Infrastructure in Europe

How the European Union (EU) Can Build the Capability to Deliver on Its Digital Sovereignty Agenda

White Paper

Authors: Nicholas Gates (OpenForum Europe), with Chloe Teevan (ECDPM), Emrys Schoemaker (UNU-CPR), Krisstina Rao (Co-Develop Fund), and Federico Plantera (CEPS)

Table of Contents



Acknowledgements 3

Acronyms 4

Executive Summary 5

I. Introduction 9

II. DPI and Europe: The State of Play 11

2.1. What is Digital Public Infrastructure? 11

2.2. The EU's Recent History in Building Digital Public Infrastructure 12

III. Towards a European DPI Agenda: The EU and International Perspectives 17

3.1. The EU Perspective 17

3.2. The International Perspective 21

IV. A Vision for a European DPI Agenda 27

4.1. The internal opportunity: Enabling the capability to deliver 27

4.2. The external opportunity: From funder to partner 30

V. Conclusion 34

Endnotes 35

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Acronyms

CADA	Cloud and AI Development Act
DG CNECT	Directorate-General for Communications Networks, Content and Technology
DG INTPA	Directorate-General for International Partnerships
DINUM	Direction interministérielle du numérique
DPGA	Digital Public Goods Alliance
DPGs	Digital Public Goods
DPI	Digital Public Infrastructure
EC	European Commission
ECB	European Central Bank
ECF	European Competitiveness Fund
EDIC	European Digital Infrastructure Consortium
EEA	European Economic Area
EEAS	European External Action Service
eIDAS	electronic Identification, Authentication and trust Services
EP	European Parliament
EU	European Union
EUDI	EU Digital Identity
G20	Group of 20
GDPR	General Data Protection Regulation
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
IEA	Interoperable Europe Act
MCD	Minimum common denominator
MFF	Multiannual Financial Framework
OIS	Open Internet Stack
PPD	Public Procurement Directives
U.S.	United States
UN	United Nations

Executive Summary

With its increasing shift in focus to 'digital sovereignty', or the independence and control it exercises over its digital infrastructure and services, the European Union has a unique and profound opportunity to positively shape the digital infrastructure of European institutions and EU Member States. The European Commission, through its Tech Sovereignty Package, and the European Parliament, through recent reports and working groups, both identify dependencies in critical areas like identity and payments. These technologies are at the heart of global debates around Digital Public Infrastructure, or DPI, a global movement to build foundational, society-wide digital systems – such as digital ID, instant payment networks, and data-sharing platforms – that enable secure and seamless interactions between people, businesses, and governments.

This white paper argues that addressing the dependencies at the heart of Europe's digital sovereignty crisis will only be as successful as its capability to deliver DPI that European actors control, build, or supervise. By putting identity, payments, and data exchange at the centre of EU policy, along with the work of running and funding them, Europe can begin to develop what can be called the 'capability to deliver'. To this end, the white paper explores digital sovereignty in the EU through the lens of DPI, investigating how consequential the gap between Europe's dependency and its capability to deliver will remain if it does not take action on DPI now.

For the EU and its Member States, DPI offers an operational and active version of digital sovereignty, building on examples from the Global South, and is an important complement to the EU's prevailing approach, which is focused more on structural exposure reduction than capability building. The reasons for DPI in Europe specifically are twofold. Firstly, DPI concerns the foundational layers of the digital economy, including the payment systems, identity frameworks, and data exchange mechanisms that other services are built on, and control over these layers determines whether Europe sets the rules for its own digital infrastructure or inherits rules set by non-European providers. Secondly, DPI is also an essential component of diversifying international digital partnerships, with the potential to strengthen mutually beneficial exchange with the rest of the world.

When it comes to DPI, the constraint is not the absence of DPI but the limited visibility of what already exists, and the limited capability to expand, maintain, share and connect those systems. For example, FranceConnect, Cl@ve, SPID, PagoPA, X-Road, and MitID are

working DPI, built and run by Member States and recognised internationally. However, because no one treats these individual projects as a single class of DPI, they are not funded for maintenance, not governed in common, and not connected. This is a missed opportunity, because Europe also has important technology and governance frameworks which can support DPI adoption, such as eIDAS 2.0 for digital identity and GovStack specifications, originally developed for Global South countries building digital government services and platforms.

The EU's lack of visibility in promoting and delivering a holistic vision for DPI limits its role abroad. The EU sometimes arrives in global DPI conversations as a funder and convener rather than as a builder; firstly, because it does not consider its own implementations as DPI, and secondly, because it does not present them as such. The incremental, community-tested approaches from countries like India and Brazil carry lessons the EU can learn from by actively participating in the fora where lessons are shared and the space is being shaped. Making the EU's own implementations visible and in conversation with a global community of practice is therefore the precondition for a more reciprocal Brussels Partnership, one wherein the EU institutions and Member States co-develop standards and governance with partners.

The EU already has the necessary instruments in place to act on this: the Interoperable Europe Act, the Public Procurement Directives revision, the Digital Commons European Digital Infrastructure Consortium, the Open Internet Stack, the European Competitiveness Fund, and GovStack's specifications. The Multiannual Financial Framework cycle and the 2027 Global Digital Compact review set a window of opportunity. By thinking holistically about a European approach to DPI as part of these investments and commitments, the EU and its Member States can amplify and accelerate the impact of what they are already doing while bringing it into conversation with the rest of the world, as well as creating the capability necessary to deliver it in an ongoing way into the future.

The following sets out a subset of key recommendations for the EU institutions and Member States. A more detailed list can be found in Section IV of the white paper.

For EU Institutions

1. The EC should commit dedicated DPI funding in the disbursal of its funding envelope allocated for the EU Open Source Strategy or the European Competitiveness Fund,[1] including DPI-centric funding for sandboxes or pilot collaborations at the Digital

Commons EDIC or DPI Steward Organisation.

2. The EC should resource the Digital Commons EDIC as the primary near-term vehicle for cross-border collaboration, and formally acknowledge DPI collaboration as a critical objective for achieving European digital sovereignty.

3. The EC should provide the proposed DPI Steward Organisation a clear mandate, including (but not limited to) sharing knowledge and funding, supporting technical development activities, mapping Europe's existing implementations, and maintaining shared specifications such as those from GovStack and eIDAS 2.0.

4. The EC should create a forum for bilateral cooperation on DPI between DG INTPA and DG CNECT.

5. The EC should issue a top-down strategy for ensuring EC participation in international digital policy fora where DPI and DPG conversations are being shaped, clarifying roles and mandates between DG INTPA, DG CNECT, and other relevant stakeholders.

6. DG CNECT, in coordination with DG INTPA, should map and publish existing DPI implementations and reference implementations so that partners can find and reuse them, a task that needs coordination rather than legislation.

For EU Member States

1. Member States should publish DPI implementations as reference implementations under open licences, with accompanying governance documentation, following the model of X-Road and openDesk.[2]

2. Member States should establish or expand internal digital delivery units with the authority and staffing to build, and set targets for reducing consultancy dependence on foundational systems, following the model of DINUM in France.

3. Member States should register their DPI implementations on the DPI Map and their DPGs in the DPGA's DPG Registry, a step that requires no new funding and directly addresses the visibility gap.

4. Member State development agencies, including GIZ, Sida, Enabel, and others, as well as non-Member State development agencies like Norad, should adopt DPI as a shared frame for their digital portfolios and coordinate those portfolios through Team Europe

structures rather than bilaterally.

5. Member States should establish a forum for structured exchange with non-EU countries such as Ukraine, Brazil, and India, including secondments and joint implementation teams, so that learning from Diia, Pix and Aadhaar reaches European delivery teams.

I. Introduction

The European Union (EU) is at a pivotal moment in its history, grappling with important questions related to sovereignty, competitiveness, and economic security in its digital policy, against the backdrop of heightened geopolitical tensions. The European Commission's (EC) recent Tech Sovereignty Package and a 2025 European Parliament (EP) report both acknowledge the shared challenge around digital sovereignty, framing the problem as one of dependence in relation to operational capacity. The EP report goes further by identifying critical dependencies across storage services, identity and payment systems, and communication platforms.[3]

While tempting to frame the EU's digital policy challenges solely as problems of digital sovereignty, an underconsidered dimension is the bloc's local capabilities to implement its digital sovereignty agenda, particularly from an innovation and manufacturing point of view. Indeed, while the EU is the world's foremost digital regulator and a steadfast advocate for safety and competition in digital markets, that regulatory focus has sometimes limited the scale-up of European innovation and the development of local capacities, most prominently in government. This has contributed to the present crisis around digital sovereignty on the continent, and has negatively impacted the treatment of digital infrastructure as a commons worthy of being stewarded and maintained.

Europe's dependencies have eroded the ability of governments and the private sector alike to build in and for Europe, a cost that becomes visible only when the alternative to outsourcing is taken seriously. The assurance of trust in relationships with foreign actors was taken for granted, but many realise now that it cannot be taken for granted. For the EU, what is at stake in the current moment is not just who controls its most foundational capabilities, but whether the EU retains the industrial capacity to build and operate them. For the EU to realise its digital sovereignty ambitions, it needs the 'capability to deliver' – to us its digital prowess to move beyond a rhetorical focus on dependency and actually build key capabilities of the state that operationalise digital sovereignty in practice.

Digital Public Infrastructure (DPI) is a concept from international digital policy warranting serious consideration as a tool for enabling the capability to deliver. In a European context, DPI gives attention to what the EU's regulatory approach has left partly unaddressed: the foundational digital systems themselves – such as digital identity, payments, and trusted data exchange – and the operational capacity to build, run, and sustain them, treating their

delivery as the central task of digital statecraft. Tthese systems should be considered as vital to a European vision for digital sovereignty, and not treated as an afterthought or 'nice-to-have'. Building on the understanding presented above, this white paper explores digital sovereignty in the EU through the lens of DPI, investigating how DPI can amplify and accelerate the impact of what they are already doing while bringing it into conversation with the rest of the world.

The DPI paradigm is one lever that might positively impact the EU's digital sovereignty agenda and close this gap, and it is worth exploring in detail what a holistic approach to building DPI and engaging with the global DPI agenda might bring to the continent. The reasons for this are twofold. Firstly, DPI concerns the foundational layers of the digital economy, including the payment systems, identity frameworks, and data exchange mechanisms that other services are built on, and control over these layers determines whether Europe sets the rules for its own digital infrastructure or inherits rules set by non-European providers. Secondly, DPI is also an essential component of diversifying international digital partnerships, with the potential to strengthen mutually beneficial exchange with the rest of the world.

The EU would be remiss not to have DPI as part of its full stack approach to digital sovereignty. Embracing DPI can, and should be, consistent with the ideals and advocacy of the people behind the EuroStack initiative and related efforts to promote European digital sovereignty.[4] Many actors in the EU have made the case for building at the level of the stack rather than regulating what sits on top of it, from the EuroStack authors[5] to Robin Berjon's work on the protocol layer[6] and voices within the EC and EP themselves.[7] Where this paper differs is in emphasis: the constraint is less the absence of a European stack than the capability to deliver, connect, and sustain the foundational components that already exist.

The key findings that support these observations result from a workshop entitled 'Digital Public Infrastructure and Europe: Digital Sovereignty, Global Interconnections, and Pathways for Collaborative Action'.[8] The workshop was convened by OpenForum Europe and Co-Develop at the University Foundation in Brussels on 21 and 22 April 2026, and was attended by over 50 individuals from across a range of backgrounds and expertise. Drawing on those discussions, the white paper sets out an argument rooted in the key findings and their implications for EU policy, offering recommendations for how the EU might use DPI to serve its digital sovereignty goals.

II. DPI and Europe: The State of Play

The EU's dependence on digital infrastructure built and operated elsewhere is well documented, and the response tends to run along two tracks. The first is regulatory and has included rules for platforms, data, and AI, which the EU applies to systems it does not build. The second is investment and industrial policy, spanning funding programmes, industry-wide projects, and national initiatives that have produced individual assets without a shared architecture connecting them. Neither track addresses the layer in between, the common foundations that Member States could build on and that firms and public bodies could build services upon. This is the layer that the concept of DPI describes.

This section sets out what DPI means, where the concept comes from, and why it has become relevant to EU debates about digital sovereignty, building on previous precedents from within the EU.

2.1. What is Digital Public Infrastructure?

The Group of 20 (G20) – an intergovernmental forum comprising 19 sovereign countries, the EU, and the African Union – defined DPI as "... a set of shared digital systems that are secure, interoperable, and built on open standards".[9] These foundational systems are designed to provide equitable, population-scale access to essential public and private services. DPI originates from experiences in lower-middle income countries looking to regain control over their digital infrastructure – most notably India's India Stack (Aadhaar, Unified Payments Interface (UPI), and data exchange layers)[10] and Brazil's Pix[11] for digital payments.

DPI gained significant traction in international digital policy during the early 2020s, after the G20 endorsed it under India's 2023 presidency[12] and the United Nations (UN) and the World Bank[13] adopted similar terminology. As defined by such actors, DPI offers a distinct and novel approach: open, interoperable infrastructure that provides foundational digital services as public utilities while enabling private innovation at the access and application layer.[14] Though DPI is defined broadly, many actors emphasise its technology, governance, and adoption context, evolving the idea of digital government to define the role of the state in shaping digital service delivery and markets.

DPI is not synonymous with a specific technology or design approach (for example, open source vs. proprietary) and is also not simply a platform. Where platforms aggregate users within controlled ecosystems, DPI relies instead on minimal standardised systems and protocols that enable a diverse ecosystem without concentrating control. Rather than choosing between state control and market concentration, DPI is a way for countries to build public-led digital infrastructures that allow them to shape their own digital futures. It is this combination – public control over foundations without public control over everything built on them – that makes DPI worth examining in the European context.

The DPI approach to building digital infrastructure is aligned with the interests of the EU as a community of countries, and might help the continent solve structural challenges at the heart of digital sovereignty, like agency and capacity[15] (on the builder side) and autonomy and resilience (on the infrastructure side).[16] Whether a DPI approach works in a supranational union like the EU remains untested. EU Member States are individually capable, but their common yet diverse digital policy objectives do not always generate the scale, bargaining power, or lead-market demand needed to reduce dependence on their own.

2.2. The EU's Recent History in Building Digital Public Infrastructure

The EU does not have an official strategy or policy position on DPI. While the EU and its Member States have built many systems that count as DPI (or close to it), the bloc's history as a whole on building DPI is mixed. The EU has sometimes struggled with fragmentation of efforts across the union and has focused predominantly on regulation and financing as tools, rather than building common infrastructure. Like many governments globally, it has also become reliant on outsourcing the capacity to achieve its objectives to consultants and research consortia.[17] Despite pockets of promising activity in certain Directorates-General and across EU Member States, this general trend of outsourcing has limited Europe's ability to build out operational capacitybuilding,[18] and has created a lack of common foundations for public actors, like EU institutions and Member States, to build on.

Even in spite of such understandable challenges, the EU has successful examples to draw on when considering its future approach. To date, the EU's strength has been not in building centralised systems but in harmonising national infrastructures so they interoperate across borders. A recent and prominent example is the 'electronic Identification, Authentication and trust Services' (eIDAS) regulation, first adopted in 2014[19]

and substantially revised with eIDAS 2.0.[20] This is the clearest case of how this might be achieved in the EU; rather than replacing Member States' digital identity schemes, it established a framework for mutual recognition. eIDAS 2.0 specifically extended this towards a common EU Digital Identity (EUDI) Wallet.[21] [22] This coordinating role, interconnecting what already exists rather than building from the centre, may be where the greatest potential lies for DPI at the EU level.

The result of eIDAS 2.0 is an architecture in which Member States retain responsibility for issuing and managing identity credentials, while a common regulatory layer governs how those credentials are recognised, trusted, and used across borders.[23] Significant progress has been made to date: four Large-Scale Pilots were concluded in 2025, and two more are currently active, together involving over 200 partners and focusing on core use cases of identity and payments.[24] Implementation progress remains uneven; while countries like Germany and Austria have advanced pilot implementation, some Member States have not begun.[25]

eIDAS 2.0 is best understood as a governance architecture – a framework of rules, standards, and trust relationships – rather than as a technology itself. The wallet is one implementation of that framework, not the defining feature. This distinction matters: it means the questions worth asking about eIDAS 2.0 are governance questions, not product questions. It also means that its live tensions – for example, around surveillance,[26] the binding of digital credentials to individuals,[27] and the smartphone dependency[28] – are design and governance challenges, not merely technical ones. Resolving them is central to whether eIDAS 2.0 functions as DPI or as a compliance exercise that reproduces exclusion in digital form.

The smartphone dependency issue deserves particular attention, because it is the sovereignty argument in miniature. A wallet lives on a phone, and its security architecture in practice rests on the secure element or hardware-backed keystore, the attestation APIs that verify device integrity, and the app distribution channels through which it reaches users. Apple and Google control all three. The EU has therefore written the rules for its most concrete DPI while the layer those rules govern runs on a substrate set outside the bloc, and one it cannot change. This is not a technicality, but the difference between setting terms and inheriting them, and it recurs wherever European infrastructure is built on components the EU neither maintains nor governs.

Where the EU has instead attempted to build or mandate infrastructure directly, progress

is slower and work remains to be done. One example is the 'digital euro', which is the European Central Bank's (ECB) proposal for a central bank digital currency available to all citizens and businesses in the Eurozone.[29] Unlike commercial bank deposits or existing digital payment instruments, it would represent a direct claim on the central bank – the digital equivalent of cash – and would be issued and governed as a public monetary instrument rather than a private financial product.[30] The legislative framework proposed by the EC/ECB in 2023 sets out the conditions for issuance, the role of intermediaries such as commercial banks in distributing and servicing wallets, and the privacy and data protection requirements that would govern transactions.[31]

The digital euro proposal has moved slowly through the legislative process, with significant debate in the EP about the scope of the online use case, privacy protections, and the relationship between the digital euro and existing private payment infrastructure.[32] The ongoing development of the digital euro raises a different but equally fundamental challenge: the problem statement remains contested. The Pix programme in Brazil succeeded in large part because the DPI was built around a clear and politically legible purpose – expanding financial access to populations that existing systems had failed.[33] The digital euro, by contrast, is simultaneously being asked to address monetary sovereignty (reducing dependency on U.S.-based payment rails), privacy (replicating the anonymity of cash in digital form), and financial inclusion.[34]

Yet another example is the Common European Data Spaces,[35] which is a promising programme in its scope and conception, yet the individual data spaces remain highly fragmented and largely stuck in pilot phases.[36] The programme establishes sector-specific frameworks for data sharing across Member State boundaries in domains including health, mobility, energy, agriculture, and finance.[37] The programme builds on the foundations laid by the Data Governance Act,[38] the Data Act,[39] and the Interoperable Europe Act (IEA),[40] and aims to create conditions under which data held by public bodies, businesses, and individuals can flow more freely across borders and sectors, while remaining subject to European rules on privacy, portability, and access.[41] While their flexibility in design is one of their advantages, they have also been criticised for a lack of conceptual and regulatory clarity, illustrating the difficulty of translating ambition into systems.

What both of these examples show, unlike the eIDAS 2.0 example, are the challenges of building centralised systems, and the tensions in doing so within a supranational structure like the EU. By treating these systems as DPI and bringing them together with the efforts of Member States, while strengthening the internal capability to deliver, maintain, and expand

those systems through public resourcing and investment, the EU might be able to achieve something that is greater than the sum of its parts. The next years of their implementation will be critical for ensuring the right institutional arrangements and stakeholder involvement necessary for delivering these projects in a way that meets the needs of their end beneficiaries, including citizens.

There is also a lot of DPI being built already across EU Member States. Countries like France and Italy in particular have made significant strides. France's FranceConnect identity federation platform[42] serves tens of millions of users and provides a unified authentication layer across public services.[43] The Direction interministérielle du numérique (DINUM) in France has driven an ambitious open source strategy, and its 'La Suite Numérique' initiative is building sovereign productivity tools for the French public sector (in cooperation with Germany) as an alternative to commercial offerings.[44] Italy's SPID digital identity system and PagoPA payments platform have also brought scalable digital infrastructure to one of the EU's largest populations.[45] Smaller Member States are making progress, too. Estonia's X-Road data exchange layer and near-complete digital government remain reference points for the continent (with adoption in 40+ countries and territories),[46] and Denmark's MitID and Digital Post system have made digital-by-default the norm for citizen–government interaction.[47] [48]

All of these examples demonstrate that EU Member States possess the capacity and ambition to build digital public services. The constraint is that each success came from a single state operating within its own institutional logic, with unified authority over standards, procurement, and delivery. Replicating that coherence across 27 Member States – each with different institutional traditions for producing public goods, different relationships between state and market, and different thresholds for shared investment – is a coordination problem. The challenge is not merely limited interoperability, but a model built for a unitary state being asked to work across a union.

There are tensions in building within the EU which current initiatives are trying to resolve. For example, the Cloud and AI Development Act (CADA)[49] seeks to build capacity in Member States by reshaping public procurement, conditioning access to government contracts on graduated 'sovereignty assurance levels' modelled on France's SecNumCloud[50] regime. In parallel, Member States have begun coordinating directly, often outside formal EU structures, such as at the November 2025 Franco-German Summit on European Digital Sovereignty in Berlin,[51] which led to intergovernmental pledges of European preference and industry partnerships such as SAP–Mistral's 'sovereign AI stack'.[52]

This delicate interplay – between Brussels' cautious approach and some Member States' desire to move quickly – is the context in which any new DPI can emerge, and where what a 'European version of DPI' looks like deserves serious attention.

III. Towards a European DPI Agenda: The EU and International Perspectives

The workshop[53] that formed the basis for this white paper opened up a conversation around what a DPI agenda for the EU might look like, as well as how the EU can bring to bear a holistic DPI approach aligned with international partnerships. The following sections offer some observations on how this might be made possible.

3.1. The EU Perspective

In the EU, fragmentation between actors and the absence of a shared conceptual framework are the primary constraints on uptake of DPI. Establishing a working understanding – if not an operational definition – of what DPI means in a European context is therefore a precondition for productive dialogue around what a DPI approach for Europe might look like moving forward. It is important to remember that the EU and its Member States are already building DPI or DPI-like initiatives in practice; what is missing is the holistic conception that would make those efforts visible, scalable, and shareable, as well as enable productive engagement with the global community that has emerged around DPI development and DPI thinking.

The EU has many examples to build on, including those highlighted from France, Italy, Estonia, and Denmark, but also Finland, Spain, Germany, Greece and beyond. Importantly, Member States already have substantial implementations of DPI across parts of all three layers: digital identity, digital payments, and data exchange. Just to name a few, there are FranceConnect, Cl@ve[54] and SPID at the identity layer; PagoPA at the payments layer; and X-Road at the exchange layer. Member States build and run all of them, and they have international recognition. What is missing is not a definition of European DPI but the treatment of existing initiatives as DPI; this means funding their maintenance, governing them in common, and connecting them so that the terms set at each layer are understood as part of a common framework. Because these efforts are not read as a single class of DPI, they are not scaled, and the layers themselves stay governed by whoever else is running them.

3.1.1. The strengths and limits of a regulatory approach for DPI

For better or worse, a DPI approach in the EU will be defined in part within and against the

bloc's regulation. This is just as true in the era of digital sovereignty, where the Tech Sovereignty Package sets out frameworks like CADA and a detailed strategy like the EU Open Source Strategy, with less focus on design or delivery. While these regulatory and policy frameworks will undoubtedly influence the capability to deliver, they do not actively outline measures that reinforce the ability to work quickly, try new things, and – if needed – fail. This is part of why the current mandate for the EC has reframed the agenda around competitiveness and simplification, with the November 2025 Digital Omnibus[55] being the clearest expression of a 'fewer rules' turn. But it's important that the flipside of fewer rules is also the ability to build.

Historically in the EU, regulation and the so-called 'Brussels Effect'[56] – the impact of EU regulations across the EU and globally – has come to function as a kind of minimum common denominator (MCD), a standard-setting exercise that 27 Member States should agree on to be the default. This can be a strength: by setting a framework rather than mandating a product, regulation preserves Member State autonomy and control. The EUDI Wallet[57] – a secure smartphone app allowing all EU citizens, residents, and businesses to securely store and share personal IDs, digital documents, and electronic signatures – is a case in point. eIDAS 2.0 requires each Member State to offer a wallet but lets each choose whether to build it, delegate it, or recognise a private one.[58]

Framework regulation is rarely the wrong instrument for enabling parts of what is needed for digital sovereignty, but it is often insufficient on its own. If left unchecked and uncoordinated, the same interpretive latitude enabled by an MCD can leave infrastructure design vague, giving market actors room to define and operationalise different versions of digital sovereignty. For this reason, sovereignty now depends less on the volume of rules, in either direction, than on Member States feeling free to act quickly, investing in and scaling existing and new capabilities alongside EU regulations. The Digital Omnibus will not change this, since removing rules builds no more capacity than adding them did. Getting past the MCD approach means entering the territory of industrial policy and operational capacity, where the configuration of actors and the character of public investment matter as much as the rules governing the technology itself.

3.1.2. Build on and stitch together what exists

As this logic implies, digital sovereignty gets complicated due to tensions in enabling broad sovereignty across the bloc versus enabling Member States individually to achieve their own versions of it. The two do not necessarily need to be in competition with one

another, and at the foundational layers they cannot be, because neither works alone. A Member State running its own identity or payment layer sets terms only within its own market, which is too small to hold against providers operating at continental scale. The EU sets terms at scale but runs nothing itself, which is why it should instead focus on connecting and scaling existing implementations.

In this view, the EU's DPI problem is fundamentally one of integration and coherence, not of absence or inability. What is needed is to build on what exists and strengthen it through the DPI lens, rather than reinvent it. The EU should treat sharing/reuse and interoperability between existing DPI initiatives as an investment for digital sovereignty, akin to any of its other efforts, and build from there. It can do so by facilitating knowledge exchange and cross-border sharing of digital technologies, balancing standards and governance from the EU with delivery capability in Member States. For example, eIDAS 2.0's framework, even if imperfect, already exists as a governance architecture and a set of rules, standards, and trust relationships, rather than as a technology. This creates stronger and more user-centric delivery blueprints for the public and private sector to build on top of, while continuing to promote standardisation and interoperability.

The same lens applies, for example, to the digital euro[59] and the Common European Data Spaces.[60] The digital euro is less a new technology than a governance architecture – a rulebook reusing existing European payment standards – whose binding constraints are institutional (like adoption and bank disintermediation), while the Common European Data Spaces is a programme with real standardisation and norm-setting potential for addressing data fragmentation (even if it has so far reproduced it).

3.1.3. Focus on active implementation, rather than passive adoption

If the EU and its Member States are to build sovereign digital infrastructure that is successful and impacts people's lives, then the EU and its Member States have to shift the centre of gravity from adoption to implementation. To be digitally sovereign, it is critical that EU Member States move towards building proactively rather than simply out of compliance. The EC is most comfortable in two of DPI's three dimensions – technology (specifying standards) and governance (designing frameworks) – and least practised in the third: adoption (enforcement and active implementation). Adoption should focus on supporting active implementation, using EU power to unlock, scale, and share innovation across Member States.

The limits of the adoption and compliance mindset for digital sovereignty are worth spelling out. The EU's current approach to digital sovereignty, as outlined in the Tech Sovereignty Package, focuses largely on 'structural exposure reduction', whereby the bloc seeks to limit dependence on non-European actors through procurement constraints, data localisation, and vendor diversification. This is tractable through regulatory and procurement instruments, and it is the form of sovereignty that EU policy most readily pursues. But it stands in contrast to 'capability building', a complementary skill set which is more about developing the institutional capacity to govern infrastructure on one's own terms – to build, maintain, adapt, and extend it.

The distinction between the two turns on a practical test: whether the EU could change or replace a given component without rebuilding what sits on top of it. A European provider as difficult to leave as the one it replaced satisfies exposure reduction while relocating the dependency, rather than removing it. Capability building means retaining the ability to move. Applied to what the EU already runs, the test is uncomfortable. For example, the EUDI Wallet passes the exposure test, since Member States issue wallets under EU rules, but not the movement test, because the device attestation and app distribution channels it relies on cannot be substituted. Both will be necessary if the EU is to be successful in delivering on its digital sovereignty agenda.

3.1.4. The EU should chart its own path

The EU is not going to be able to make work for itself the DPI model of a country like India, which is pursuing its own vision of digital sovereignty. India's DPI model was built on a set of conditions that simply do not apply to the EU: a single government with the authority to assign a universal identifier to every resident;[61] a largely unencumbered design space, unconstrained by pre-existing national systems; and a clear and urgent problem statement (e.g., identification challenges, financial exclusion, etc.) that gave its infrastructure a political logic from the outset. The EU has none of these. It has 27 sovereign Member States, each with its own legal framework, constitutional tradition, and established digital infrastructure, and none of which are leaning towards acceptance of a centralised model like India's.

The EU ought to remember that countries do not pursue DPI for a single reason. There are many recurring drivers such as fiscal resilience, public service delivery, economic development, national sovereignty, and competition in concentrated markets.[62] Countries like Brazil and India, both of which promulgated their DPI models through the G20, pursued DPI as an economic development lever[63] to bring populations into the formal economy. But

programmes reflect several of these drivers at once, and the driver a country prioritises determines the trade-offs. For example, Brazil was also motivated by fiscal efficiency and reducing reliance on paper transactions, while Aadhaar was built in part to cut leakage in welfare spending.[64]

The EU's driving concern might well be digital sovereignty, rebalancing dependency on infrastructure it did not build and does not control. That difference will shape not only the political logic of DPI, but the problem statements that infrastructure is expected to solve and the theories of adoption that determine whether it succeeds. That should not mean, however, that the EU does not also learn lessons from other models about what it means to bring infrastructure closer to people and reinforce its centrality to human and social development outcomes. eIDAS 2.0 is an example of how the EU might thread this needle and develop a reasonable, pan-European operationalisation of sovereignty while also driving economic inclusion, in opposition to the more centralised model of a country like India.

3.1.5. Summary

To deliver on this vision, the EU should create logics that incentivise coordination, knowledge sharing, and reuse. The EU's regulatory approach could be lightened, where appropriate, and support implementation and long-term adoption as priorities. This demands new models and best practices for governing and implementing DPI in the EU, and a DPI Steward Organisation, which the EC proposed in the Tech Sovereignty Package,[65] could do this. Such a body could help Member States and individuals work within rather than against the regulatory apparatus. It would support those who need to work creatively across institutions, Member States, and partners to navigate the constraints of EU bureaucracy, enabling them to share, co-develop, and co-govern digital infrastructure capabilities that are greater than the sum of their parts.

3.2. The International Perspective

DPI in the EU is not exclusively an internal matter for digital sovereignty, but also a route to more diversified partnerships, and to exchange that runs in both directions rather than outward only. At present, the EU shows up in global DPI conversations primarily as a funder and occasional convener, but rarely as a builder or active co-participant, which follows directly from the problem described above. Norm-setting and soft power carry real weight, and the EU should use them to achieve its digital policy objectives, particularly as regards

sovereignty within the bloc and as it projects that sovereignty abroad.

The problem is that the EU's own implementations are not visible and in conversation with the rest of the world, so what it has to offer partners alongside those norms is money rather than practice. While its offer should evolve, the EU's relationship with DPI today does not stop at its borders, and neither do the consequences of having an inconsistent policy approach. How the EU builds and governs at home has already begun to shape digital infrastructure decisions far beyond its borders, whether by design or not. The reverse is also true. The global DPI conversation, which the EU and its Member States have largely engaged with at one remove rather than as peers, has things to teach that policymakers might not have fully absorbed yet.

3.2.1. EU engagement with DPI is mediated through international partnerships

The EU's lack of a holistic, homegrown approach to DPI makes engaging in global discussions challenging. At the moment, the EU engages with DPI through its international partnerships, where it supports partner countries in adopting DPI as part of technical assistance and financing packages. The focus, however, is largely on bilateral engagement, which constrains the bloc's ability to participate in and shape multistakeholder discussions and collaboration, all of which have been essential for the success of the global DPI movement over the last years.

One challenge here is the EU's lack of formal recognition of DPI as a concept. DPI language appears in the core digital strategies of dozens of countries across Africa and Latin America, and regional bodies have also made DPI an organising concept for cooperation. The EU is less visible here, which is notable given that other multistakeholder fora and institutions – like the G20, the UN, and the World Bank – have embraced DPI. At the UN, the Global Digital Compact treats DPI as a key driver of inclusive digital transformation.[66] The G20 reached, as a ministerial agreement, the first multilateral governmental consensus on DPI under India's 2023 presidency.[67] And the World Bank has embraced DPI as a convener and knowledge partner, building dedicated programmes and research around it.[68]

Like some other developed economies, the EU as a bloc sometimes treats DPI as a 'development concept' rather than a framework with relevance to its own challenges, leaving the bloc peripheral to important conversations. For example, the EC's Directorate-General for International Partnerships (DG INTPA) does important bilateral work that is not cited in multistakeholder fora. Such diplomatic work would fall to the Directorate-General

for Communications Networks, Content and Technology (DG CNECT) and the European External Action Service (EEAS), which have not yet defined DPI policy. This is ironic, given that the EU already has working implementations of DPI capabilities across its Member States. Whatever the reasons for such absence or challenges in visibility, the reality is that more cross-unit coherence would help the EU engage with global DPI communities.

3.2.2. The limits of the Brussels Effect abroad

The Brussels Effect effects come primarily through compliance. Countries aligned with European standards in order to access EU markets. What the international DPI conversation requires from the EU is not compliance, though, but co-development. For example, General Data Protection Regulation (GDPR) adequacy processes and decisions[69] have incentivised regulatory alignment and institutional reform across partner countries, and the EUDI Wallet is beginning to influence identity architecture decisions in countries that may never join the EU. Co-development would mean building specifications and standards in dialogue with partner countries, based on their needs and contexts, rather than simply forcing default compliance with finished governance frameworks.

This is important because European regulatory requirements are designed for high-capacity institutions, but can create serious friction when exported to lower-income countries with different regulatory regimes and histories. Compliance incentives and demands sometimes crowd out locally appropriate solutions, and the preconditions attached to European capital and market access narrow the design space for partner countries, rather than expanding it. For example, the European Investment Bank's €250 million loan to support the rollout of Nigeria's digital ID[70] was conditional on Nigeria passing data protection regulation and establishing an independent Data Commissioner's Office.[71] It is important that such challenges and frictions are kept in mind when designing proactively for the future.

The normative power of the EU in the DPI space is strong already, but it is also not the same as focused, strategic engagement. The EU will need to not just rhetorically commit to DPI but develop an adequate, coherent account of how its internal technology and regulatory posture shapes its external DPI offer. The EU is already developing important frameworks, engaging in bilateral dialogue, and providing technical support and financing to partners, but entering large-scale policy fora and engaging in dialogue about how those frameworks might meet the needs of countries impacted by and complying with them will be critical.

3.2.3. Embrace a more active 'Brussels Partnership' mindset

An active mindset is needed to realise the potential of the EU's international cooperation around DPI, particularly as it relates to the Global Gateway and EU Tech Business Offer. The International Digital Strategy lays out the 'EU Tech Business Offer' itself, with the objective, "... to tailor and combine technology components in a modular approach – balancing the interests of partner countries and the EU, in order to create a package of mutual benefits."[72] The offer's focus is on private-sector investment, complemented by capacity-building and skills programmes, as well as support to the business environment in partner countries. The approach follows the launch of the Global Gateway in 2021, which sought to increase EU investments in global connectivity and digital infrastructure, to mixed results.[73]

While commendable in their scope and reach, Global Gateway efforts and the EU Tech Business Offer both lack granular understanding of how European norms, standards and investment shape digital cooperation and the development of DPI (or DPI-like systems) outside the borders of the EU. This is important because the EU's innovation potential is real and it has a vibrant digital government and GovTech ecosystem. For example, actors within the EU contribute approximately 36% of the digital public goods (DPGs)[74] in the Digital Public Goods Alliance (DPGA)[75] registry,[76] and some of the most consequential DPI-adjacent products in global deployment – in domains such as civil registration, health information systems, data exchange, etc. – originate from EU companies and Member States.

Nevertheless, DG CNECT and DG INTPA are still actively developing the EU Tech Business Offer, which might well be strengthened over time. The larger problem is the lack of visibility referenced before. European DPG and DPI outputs are not recognised as such, not productised for reuse, and not systematically lifted up in the EU's international cooperation. Under the Global Gateway and the EU Tech Business Offer, European companies also sometimes export solutions that were never deployed domestically. An EU offer on DPI should start from what the EU is doing at home, and then engage global partners in dialogue about what is transferable, what needs adaptation, and what can be learned in return.

This points toward the need for a reciprocal offering, like a 'Brussels Partnership', wherein the EU has assets to offer – including governance models, standards bodies, capacity for cross-border interoperability, and a base of DPI implementations. The bloc should take account of what those assets actually are, and engage in co-development with other

countries. This more active Brussels Partnership mindset would strengthen the EU Tech Business Offer and the Global Gateway.

3.2.4. Showcase EU-backed innovations abroad

To bring DPI into these alliances, EU institutions should embrace, learn from, and lift up the efforts of the most successful EU and European Economic Area (EEA) countries. Estonia deserves particular attention and can be a leader in a more holistic Team Europe approach. More than any other EU country, Estonia has made the export of its digital governance model an instrument of foreign policy, operating through the e-Governance Academy,[77] the Estonian Centre for International Development,[78] and the Nordic Institute for Interoperability Solutions.[79] X-Road, originally developed for Estonia, now has around 40 implementations globally.[80] Estonia's approach across all of these different efforts is instructive: it exports infrastructure through open licensing and technical assistance rather than tied aid or compliance, and it regularly engages in the governance and political economy of digital transformation.

Non-EU countries are leading the way, too. In Norway (a member of the EEA),[81] Norad[82] is one European donor explicitly engaging with DPI as a conceptual frame, including through support to the DPGA and to DPGs like OpenCRVS[83] and DHIS2.[84] Additionally, Ukraine occupies an anomalous but important position in the broader European DPI landscape: a non-EU country that has developed some of the continent's most sophisticated digital infrastructure. The Diia application[85] – delivering over 100 government services and social payments to Ukrainian citizens – is a DPI that has outpaced many EU Member States in integration and adoption, and the EU's engagement with Ukraine through the Digital Transformation for Ukraine initiative[86] and EU4Digital initiative[87] creates continued opportunities for reciprocal learning.

DPI cooperation is happening across Member States in ways that would perhaps benefit from more coordination. For example, Member State development agencies bring their own orientations and comparative advantages. Germany's Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) in particular has been one of the most active globally in DPI. GIZ had a foundational role in GovStack[88] – which has recently seen demand shift as EU governments begin to recognise the value of the specifications developed originally for the Global South. German ministries and EU infrastructure initiatives are now exploring GovStack as part of the 'Deutschland Stack',[89] which is an instructive signal that tools developed through the logic of South-South and triangular cooperation have value for EU institutions and Member States.

3.2.5. Summary

Realising this view internationally depends less on new instruments than on coherence between those that already exist. DG INTPA does the bilateral work, DG CNECT and the EEAS hold the policy and diplomatic mandates, and Member State agencies bring their own DPI portfolios, but none of them currently treats DPI as a shared frame. A more reciprocal Brussels Partnership would start by making the EU's own implementations legible, then bring them into multistakeholder fora as contributions rather than as exports. It would also draw on those already doing this well, and treat what they have learned as a European asset rather than as national practice. The DPI Steward Organisation function proposed above could serve the same purpose abroad, giving the EU a single account of what it builds, what is transferable, and what it wants to learn in return. This would be a more joined-up version of digital sovereignty that feeds into, and is in conversation with, the EU's role abroad.

IV. A Vision for a European DPI Agenda

Section III described a landscape that is rich in capability but that could benefit from more visibility of work, increased coordination of existing efforts, and effective governance of the DPI ecosystem. There is a wide array of instruments, initiatives, and implementations in place across the EU (and Europe at large) and within its external engagement, yet they need to be lifted up, adequately resourced, and coordinated with one another. This section turns from diagnosis to opportunity, setting out the most productive near-term openings and how the EC might use existing policy processes to act on them. It does not propose a new DPI framework or strategy; rather, it identifies how DPI could be operationalised through instruments that already exist, and what a more coherent European approach might look like.

Trying to build a comprehensive strategy or policy framework for DPI in the EU, internal or external-facing, risks stagnation and might dilute its impact. The argument here is different: not that the EU needs a DPI strategy or policy framework, but that operationalising DPI thinking into existing and forthcoming policy processes in a lightweight way could create space for moving more quickly to build using initiatives and within structures that already exist. The instruments and some of the initiatives exist, but what is missing is the connective tissue between them, and a clearer sense of what they are actually trying to achieve.

4.1. The internal opportunity: Enabling the capability to deliver

The EU and its Member States need the capability to deliver. They do not need to build a single sovereign technology stack from scratch, but to connect and mature the DPI capabilities it already has. The region has existing DPI implementations, which the EC should recognise and resource, and which Member States should make interoperable. This means shifting the centre of gravity from designing new frameworks to implementing and sustaining the de facto and de jure standards already in place; using regulation while pairing it with industrial policy, investment, and operational capacity; and building mechanisms and incentives for Member State collaboration.

The aim should be an EU model that works for 27 Member States, rather than importing the design logic of other countries. The EU does not need to wait for a new legislative cycle, a

new DPI strategy, or an EU-wide definition of DPI. The EP's 2025 report on European Technological Sovereignty and Digital Infrastructure[90] and the Tech Sovereignty Package, published in June 2026 after the workshop,[91] provide a sufficient policy basis for the EC to make movements to expand DPI across the EU. The Digital Omnibus also offers an opportunity to simplify the rules that make it easier to build DPI. In the Tech Sovereignty Package in particular, the EC has outlined provisions for a 'Digital Public Infrastructure Steward Organisation' in its EU Open Source Strategy, and it will be important for the EC to catalyse this opportunity for a discussion on DPI collaboration and delivery.

In practice, a DPI Steward Organisation would be worth having only if it takes on work that no existing body currently owns. Three functions stand out. The first is keeping a working register of the DPI capabilities Member States already run, so that what exists is legible to the EC, to other Member States, and to partners abroad. The second is coordinating what exists rather than only supporting or funding new development, since components already in place tend to fail for want of sustained resourcing rather than of design. The third is acting as a single point of contact across DG CNECT, DG INTPA, the EEAS, and Member State agencies, so that DPI does not remain someone else's file. Without a budget and a delivery mandate, such a body would add another coordination layer to a landscape that has several already.

While the EC works out what the DPI Steward Organisation should be, the most concrete vehicle for operationalising this in the short term is the Digital Commons European Digital Infrastructure Consortium (EDIC),[92] which brings together France, Germany, and other EU Member States to build and maintain (open) digital infrastructure as a common resource. Rooted in the same logic as La Suite Numérique[93] and openDesk[94] – sovereign, openly governed infrastructure for the public sector – the Digital Commons EDIC is trying to institutionalise the mutualism that many in the workshop identified as a precondition for sustainable DPI.

The EDIC mechanism is an instrument of inter-governmental collaboration that does not require full EU harmonisation, and it is well suited to implementing the standards, specifications, and governance logics in place while enabling collaboration on implementation and delivery. Complementing this is the Open Internet Stack (OIS) initiative, which emphasises in part the European protocol layer in communications infrastructure – a fourth DPI capability that the workshop identified as deserving of formal recognition alongside identity, payments, and data exchange.[95] If adequately resourced and leveraged, the OIS could also be a good vehicle for norm-setting and de facto

standardisation, providing an institutional form for managing DPI capabilities.

The policy architecture for operationalising this is closer to hand than might seem initially obvious. The IEA has governance mechanisms that could serve as the connective tissue between national systems without requiring their replacement. The EU is revising Public Procurement Directives (PPD),[96] which already permit open standards as evaluation criteria. What is needed is not new legislation but EC guidance, in coordination with the PPD, that treats procurement of digital infrastructure explicitly as an instrument of sovereignty and industrial policy. The European Competitiveness Fund (ECF),[97] when it materialises, creates a vehicle for public investment in foundational infrastructure. EU governments are increasingly taking up GovStack's specifications (which have for years been taken up in the Global South), offering a ready-made framework for defining what compliant, interoperable DPI components might look like, applicable to both procurement and funding decisions in the EU.

Taken together, these initiatives point towards the possibilities of a European DPI model whose most consequential contribution is delivery. This need not be a single technical stack or even a supra-national governance and adoption architecture, but refined collaboration frameworks matched with adequate resourcing and investment. Such a model would allow existing rules, standards, and trust relationships to define how infrastructure should behave without prescribing how it can be built. Importantly, this can be built on a foundation of open access, open standards, and open collaboration, with a strong basis for leveraging the strong open source ecosystem the EU already has in place. The opportunity in the current EC mandate is to extend the DPI logic by connecting these instruments into a coherent account of what European foundational infrastructure is, what it is for, and how it will be sustained by the EC alongside a broader call for digital sovereignty.

Recommendations

For EU Institutions

1. As part of the negotiations around CADA, the EC should ensure procurement guidance under the revised PPD treats open standards and interoperability as criteria of sovereignty and industrial policy, without waiting for new legislation.

2. The EC should commit dedicated DPI funding in the disbursal of its funding envelope allocated for the EU Open Source Strategy or the European Competitiveness Fund,[98]

including DPI-centric funding for sandboxes or pilot collaborations at the Digital Commons EDIC or DPI Steward Organisation.

3. The EC should resource the Digital Commons EDIC as the primary near-term vehicle for cross-border collaboration, and formally acknowledge DPI collaboration as a critical objective for achieving European digital sovereignty.

4. The EC should provide the proposed DPI Steward Organisation a clear mandate, including (but not limited to) sharing knowledge and funding, supporting technical development activities, mapping Europe's existing implementations, and maintaining shared specifications such as those from GovStack and eIDAS.

For EU Member States

1. Member States should apply the substitutability test to their own procurement of foundational systems, assessing whether a component can be replaced without rebuilding what sits on top of it.

2. Member States should publish DPI implementations as reference implementations under open licences, with accompanying governance documentation, following the model of X-Road and openDesk.[99]

3. Member States should nominate a national point of contact to, and track engagement with (where relevant), the proposed DPI Steward Organisation.

4. Member States should establish or expand internal digital delivery units with the authority and staffing to build, and set targets for reducing consultancy dependence on foundational systems, following the model of DINUM in France.

5. Member States should contribute to the EDIC as a mechanism for collaborating on DPI capabilities.

4.2. The external opportunity: From funder to partner

Complementary to its internal efforts, the EU should move from a funder role to a partner role in global DPI conversations. The EU already shapes digital infrastructure well beyond its borders yet does so without coherence or reciprocity. The aim should be to make that engagement legible and mutual. This points not to the end of the Brussels Effect but to a more reciprocal Brussels Partnership where the EU and its institutions co-develop

standards and governance with partners rather than exporting finished frameworks. The EU does not need a new DPI foreign policy, but to operationalise DPI thinking within existing and forthcoming policy processes, and be honest about the gaps in its current approach to digital policy, particularly as it relates to discussions at home and abroad regarding sovereignty. Doing so could unlock far more coherent engagement than the EU currently achieves.

As with the internal opportunity, the policy basis for this external opportunity already exists (at least partly). The most concrete policy signal is the EU's International Digital Strategy.[100] It marked DPI's arrival in the EU's external policy vocabulary, identifying DPI alongside AI, cybersecurity, and digital identity as a priority area for cooperation, and positioning it as a core component of the EU Tech Business Offer.[101] While the strategy is non-binding and outward-facing, it has implications for policy coherence. By positioning the EU as an exporter of DPI components and standards, it strengthens the case for getting the EU's own DPI house in order. Additionally, the Global Gateway, as the EU's broader connectivity strategy, and the Tech Business Offer within it, creates a mechanism for aligning European investment with DPI principles like open standards, interoperability, and data sovereignty. To use these vehicles, the EC could speed up Global Gateway disbursement, and the EU Tech Business Offer should embrace the DPI logic more explicitly.

Four specific areas require attention by EC policymakers before translation can happen. The first is visibility. The EU and its Member States have a base of DPI implementations – in identity, payments, data exchange, and adjacent domains – that do not appear on the DPI Map,[102] are not recognised within global DPI communities as such, and are not productised in ways that make them available for reuse. Closing this gap would not require building new DPIs but making what exists legible: mapping examples, publishing reference implementations, and creating the conditions for other countries and regions to engage.

The second is reciprocity. The EC engages with global DPI forums primarily as a funder, not as an implementer, limiting what it can offer and what it is able to receive. For example, the incremental and community-tested approaches that characterised the growth of Pix[103] and Aadhaar[104] carry lessons that European institutions have not yet absorbed, because they are not always present in conversations where those lessons are exchanged. A different posture would deploy practitioners and implementers to international DPI convenings alongside funders, and build mechanisms for knowledge transfer to move in both directions, treating partnerships with countries like Brazil, India, and Ukraine as learning relationships rather than export opportunities.

The third is alignment. What the EU promotes internationally does not always reflect what it is building at home, and what it learns from international partners does not always inform domestic policy. The mutual recognition commitments by DG INTPA in the International Digital Strategy will only be meaningful if accompanied by a co-development approach to specifications and standards. For example, interoperability between eIDAS and other systems is not primarily a technical challenge, but a governance and trust framework challenge that requires sustained bilateral engagement. Leveraging existing stakeholder fora established by DG INTPA to do this would be a good place to start.

The fourth is sustainability. The instruments for cross-border investment in shared DPI do not yet exist at scale. What is needed is not another trust fund but better analysis: a clearer picture of what the actual investment gap is, what kinds of organisations are capable of receiving and deploying that investment productively, and what governance arrangements make continued maintenance likely. The financial engineering behind EU development cooperation instruments – guarantee funds, export credit agencies, the Investment Hub, etc. – is important but insufficient without this analytical foundation.

The 2027 review of the Global Digital Compact,[105] at which UN Member States will assess progress on two DPI commitments – increased funding and a settled safeguards framework – represents a concrete accountability moment at which coherence will be tested. The EU's contribution to the DPI Safeguards initiative[106] is currently lower than it could be, and should be actively reviewed by the EC in the lead-up to that review. The current EC mandate, the current Multiannual Financial Framework (MFF) cycle, and the current political window on digital sovereignty create the conditions for acting before that moment arrives. The EU does not need to launch more initiatives, but to decide, concretely and honestly, what the EU's external DPI offer is for and then build the capability to deliver it.

Recommendations

For EU Institutions

1. The EC should create a forum for bilateral cooperation on DPI between DG INTPA and DG CNECT.

2. The EC should invite practitioners and implementers to DPI convenings, and build structured channels for lessons from foreign partners to feed back into domestic policy.

3. The EC should issue a top-down strategy for ensuring EC participation in international digital policy fora where DPI and DPG conversations are being shaped, clarifying roles and mandates between DG INTPA, DG CNECT, and other relevant stakeholders.

4. DG CNECT, in coordination with DG INTPA, should map and publish existing DPI implementations and reference implementations so that partners can find and reuse them, a task that needs coordination rather than legislation.

5. DG INTPA, in coordination with DG CNECT, should commission a clear analysis of the actual investment gap and the organisations able to absorb funding productively, before designing any new financial instrument.

For EU Member States

1. Member States should register their DPI implementations on the DPI Map and their DPGs in the DPGA's DPG Registry, a step that requires no new funding and directly addresses the visibility gap.

2. Member State development agencies, including GIZ, Sida, Enabel, and others, as well as non-Member State development agencies like Norad, should adopt DPI as a shared frame for their digital portfolios and coordinate those portfolios through Team Europe structures rather than bilaterally.

3. Member States should send staff from national digital agencies, not only from development ministries, to international DPI convenings, drawing on institutions such as DINUM and the e-Governance Academy.

4. Member States should fund the adoption and maintenance of DPGs as DPI, as well as contribute back funding and resources to any DPGs that their systems depend on, following Norad's support to OpenCRVS and DHIS2. They should not fund new development alone.

5. Member States should establish a forum for structured exchange with non-EU countries Ukraine, Brazil and India, including secondments and joint implementation teams, so that learning from Diia, Pix and Aadhaar reaches European delivery teams.

6. Member States should contribute to the DPI Safeguards initiative in their own right ahead of the 2027 review of the Global Digital Compact, rather than leaving European input to the EC alone.

V. Conclusion

The EU now has a high level of digital dependency, measured by the EC itself in hundreds of billions of euros per year. The argument of this white paper has been that the challenge in building DPI to address digital sovereignty is a core complement to other approaches the EU and its Member States are already taking to address digital sovereignty. The challenge is not standards or governance, where the EU is strongest, but the capability to deliver, where the work of building, running, funding and sustaining infrastructure actually happens. DPI is useful to the EU and its Member States because it puts that capability at the centre of reducing dependencies. At the foundational layers of identity, payments, and data exchange, whoever runs the layer sets its terms, and rules alone do not confer control over infrastructure that someone else operates.

The prescription for addressing these challenges is less dramatic than it sounds. The EU does not need a new stack, a DPI strategy, or an EU-wide definition of DPI. EU Member States already run numerous DPI implementations, and the EC itself already holds the instruments to connect and sustain them, in the form of legislation like the IEA, funding vehicles like the ECF, and new institutions like the Digital Commons EDIC. The proposed DPI Steward Organisation, as outlined in the EU Open Source Strategy, offers a further opportunity. In other words, the policy basis exists, but what is missing is the decision to treat these implementations as infrastructure worth maintaining, and a criterion for what counts as digital sovereignty when the EU procures or builds DPI.

The same logic settles the question of the EU's external posture. The bloc shows up in global DPI conversations as a funder and a norm-setter because it does not yet recognise itself as a builder, and it does not recognise itself as a builder because its own implementations are not as visible as they should be internationally, even to other actors within the EU. Fixing this problem is what would make a reciprocal offer possible, one built on co-development with partners rather than the export of finished frameworks. The MFF cycle and the 2027 review of the Global Digital Compact form a window of opportunity in which this is actionable without new legislation.

The choice for DPI in the EU is not between regulating and building. It is between continuing to set rules for infrastructure that others operate and acquiring the capacity to operate infrastructure whose rules the EU sets and can change. That capacity is within reach with the instruments already in hand.

Endnotes

[1] Negotiations for the ECF and its amendments are still ongoing as of the time of the writing of this white paper.

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[8] The workshop was held under Chatham House rules. No direct attributions are made to individuals or organisations that attended the workshop. Where otherwise left unattributed, these comments can be assumed to belong to group or individual perspectives of those attending the event.

[9] See: "G20 Digital Ministers Recognize Digital Public Infrastructure as an Accelerator of the Global Goals", United Nations Development Programme, 19 August 2023, https://www.undp.org/press-releases/g20-digital-ministers-recognize-digital-public-infrastructure-accelerator-global-goals.

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