DIGITALEUROPE

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DIGITALEUROPE's response to the public consultation on a reporting scheme for data centres in the EU

Executive summary

DIGITALEUROPE welcomes efforts to better understand the energy and sustainability impact of data centres in Europe and supports the European Commission's (Commission) efforts to establish a common Union rating scheme for data centres. Below, we have outlined our key recommendations for the initial phase of this process: a reporting scheme for data centres in the EU.

- First-year reporting should be done against the specifications set in Annex VII of the Energy Efficiency Directive (EED), with flexibility and additional safeguards for the information provided under point b) of Annex VII.
- Leniency and flexibility should be applied regarding point b) KPIs set out in Annex VII.
- The European database should be established by the Commission by 1 March 2024 to allow sufficient time for operators to provide input.
- The Commission should clarify which exact data points colocation and co-hosting operators will be able to disclose by 2026 pending availability.
- Annex VII of the EED and the four Annexes of the Draft Delegated Act (DDA) should be in alignment. Several indicators that were included in Annex II were not consulted upon during the Technical Assistance Study and should be removed from the DDA at this time.
- Data centres should be required to report once, on the same consistent set of information to avoid duplicative reporting and undue administrative burden.

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- Clarity is needed on what data will be made publicly available.
- Measures are required to prevent the disclosure of confidential business information. To prevent risks of public disclosure, DIGITALEUROPE recommends the reported data be erased by the Commission, European database and Member States within two years from the date they are reported.

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Ensure first year of reporting is done against the specifications set in Annex VII of the EED

Recommendation: **DIGITALEUROPE recommends a clear inclusion of language in Article 3(2) of the DDA that,** *'For the first reporting deadline of May 15, 2024, Member States shall allow that the reporting be limited to those KPIs set out in Annex VII in accordance with Standard EN 50600-4, to tackle the significant legal uncertainty and operational challenges of applicability*.'

Rationale:

- ***To facilitate timely compliance:*** given the delayed publication of the DDA and the subsequent two-month scrutiny by legislators, the final adoption of the Delegated Act will be further postponed. Furthermore, the list of indicators is different and longer than those set out in the Technical Assistance Study, meaning the industry would be obliged to report at very short notice on metrics it was not aware of or consulted on, for the year preceding the date of entry into force of the Delegated Act. This may impede the ability to comply in a timely manner.
- ***To avoid ambiguity at the transposition phase****:* the current drafting creates dependence on transposition by Member States, leading to ambiguity regarding whether the first reporting on 15 May 2024, should be based on Annexes I and II of DDA or may be in accordance with the general criteria of Standard EN 50600-4 where applicable, as in Annex VII of the EED.
- ***Precedence****:* There are examples of similar flexibility in delegated acts and other Commission implementing regulations in other environmental regulatory areas (e.g., labelling of chemicals).

Recommendation: **Relatedly, DIGITALEUROPE is also requesting leniency and flexibility regarding point b) KPIs set out in Annex VII.**

Rationale:

- Certain data centres may not readily have access to the specified data, contingent upon their type. DIGITALEUROPE recommends including an amendment to reflect this.
- The information under point b) is commercially sensitive, necessitating additional safeguards to ensure its confidentiality and prevent public disclosure (see further detail under 'Prevent risks of disclosure of confidential business information' on page 10 below). Disclosing some of this data can enhance cyber security risks, for example, releasing data such as kWh and data traffic indicators can provide bad actors with

indications on where to focus attacks on strategically important locations.

Recommendation: **The European database should be established by 1 March 2024.**

Rationale:

- To allow operators sufficient time to input the requested data and allow for a robust collection ahead of the 2025 reporting.

Provide clarity on the transition regime for co-hosting and colocation operators

Recommendation: **DIGITALEUROPE asks the Commission to provide clarity on which exact data points co-hosting and colocation operators can disclose by 2026 pending availability**. We believe that lessors should only be required to share the data within their control and the data that comes from their tenants (e.g. the IT equipment-related data) should only be required by 2026. **Tenants of co-hosting and colocation data centres should be allowed the transition time to disclose this data by 2026 and not be required to do so beforehand.**

During the two-year transition period, the Commission should develop guidance in close collaboration with the industry on how co-hosting and colocation data centres should receive, store, aggregate and report data collected from their tenants/customers.

Rationale:

DIGITALEUROPE believes many questions still remain regarding the reporting framework for the European database, specifically whether colocation customers can share aggregated data with the facility operator and the security of confidential data.

Concern remains that in the colocation data centre scenario, colocation customers would be responsible for sharing data, in some instances confidential and possibly competitive data, with another business entity, a colocation data centre operator. This not only creates a risk for the colocation customer as to what happens to its data once it is shared outside of the company, but this is also the responsibility of a colocation customer to handle such confidential data of their customer.

There are contractual clauses between colocation and co-hosting customers and providers which makes reporting more challenging. The DDA recognised this by allowing co-hosting and colocation operators until May 2026 to report.

Recommendation: **DIGITALEUROPE recommends the removal of the word 'publish' from Article 3(5):** '*By 15 May 2026 colocation and co-hosting data centre operators shall, gather,* ***~~publish~~****, and communicate to the European database…"*

Rationale:

For clarity and to align with the obligations for enterprise data centres outlined in Article 4. Without the removal of the word 'publish', it might imply additional publication requirements for colocation and co-hosting data centres.

Ensure alignment between Annex VII of the EED and the four Annexes of the DDA

Recommendation: **DIGITALEUROPE recommends the removal of reporting elements that were not consulted on as part of the Technical Assistance Study throughout 2023 from the scope of reporting for now (detailed below**). The inclusion of these indicators in the future should be subject to consultation with stakeholders.

Rationale:

- ***Lack of industry consultation*****:** some reporting elements identified for inclusion in the scope of the reporting obligations in Annexes I and II have not been consulted on with stakeholders as part of the Technical Assistance Study conducted throughout 2023, and are not referenced in the EED. While several additional metrics listed in Annex VII were subject to feedback from the industry as part of the Technical Assistance Study, none of the elements identified on page 7 were raised during the consultation process
- ***Relevance to EED's ambition*****:** DIGITALEUROPE again notes that the legal basis of the EED is the Treaty's objective to 'promote energy efficiency and energy saving and the development of new and renewable forms of energy.' Reporting should focus on elements that contribute to achieving this objective. Reporting elements should be consistent with the information listed in Annex VII of the EED, and only information which is needed to evaluate the energy efficiency performance of the data centre. For example, the DDA does not address the following EED Annex VII reporting requirements: temperature set point and data stored and processed. Many newly

added reporting elements are not directly relevant for evaluating the energy efficiency performance of data centres.

- ***Undue administrative burden****:* the more elements that are added the greater the administrative burden for operators – especially if these elements are not direct indicators of energy efficiency.

Indicators included in Annex II that were not consulted on during the Technical Assistance Study and which DIGITALEUROPE recommends removing are: [1]

- 1(c) - Data centre computer room floor area
- 1(g) - Average battery capacity
- 1(h) - Battery time
- 1(m) - Rated cooling capacity
- 1(n) - Type of refrigerant used
- 1(o) - Cooling degree days
- 3(a) - Incoming traffic bandwidth
- 3(b) - Outgoing traffic bandwidth

Indicators included in Annex VII that were not consulted on during the Technical Assistance Study and which DIGITALEUROPE recommends removing are:

- 3(c) – Incoming data traffic
- 3(d) – Outgoing data traffic

Clarify the reporting approach to avoid duplicative reporting

Recommendation: DIGITALEUROPE advocates for an amendment in the DDA that clarifies the possibility for operators to report when similar reporting obligations apply at national and EU levels, provided they have the same thresholds and KPIs. **We recommend that an additional paragraph be included in Article 3 of the Delegated Act that clarifies that the requirement established for Member States in Article 12(1) of the EED is fully met by Articles 3(1) and 3(2) of the Delegated Act.**

Rationale:

There remains some ambiguity as to whether EU data centre operators will be required to report twice: once to the EU database (reporting the data in

[1] Dissenting members Danfoss and Siemens do not agree with DIGITALEUROPE's recommendation to remove certain indicators in Annex II.

Annexes I and II to the Delegated Act), and a second time to Member States (reporting the data in Annex VII of the EED). The latter approach has already been implemented in Germany, and other Member States may take the same approach.

Reporting twice is at odds with the Commission's goal of reducing the burden associated with reporting requirements by 25%. Data centre operators should only be required to report a single time, on the same consistent set of information, to reduce the reporting burden for operators. The Delegated Act should clarify that this is the case.

Provide clarity on what data will be public

Recommendation: If commercially sensitive reporting requirements are not removed from the DDA, **DIGITALEUROPE recommends including guidance in the Delegated Act as to which data should not be made public at the facility level, in line with the designations set out in section 4 of the draft Task C report.**

Rationale:

DIGITALEUROPE has repeatedly flagged throughout the consultation on the EED and the subsequent Technical Assistance Study, that facility-level information on data stored, data processed and data traffic does not have a connection to energy performance and is outside the scope of the EED, and in addition is commercially sensitive. The commercial sensitivity of these elements was acknowledged in the draft Task C report (EU repository for the reporting obligation of data centres, 9 June 2023), which noted that this data should be non-public (section 4.4). While Article 12(1) of the EED provides for protecting confidential data, there is no guidance given to Member States in the DDA about what data is confidential. In the absence of guidance, some Member States may require the public disclosure of information on data stored/processed / traffic at the data centre facility level. This creates risks for operators – for example, by providing the total number of racks, competitors could determine the type of hardware and servers operators use and the services a cloud provider provides through reverse engineering. The risk is amplified when all indicators are provided collectively, rather than some in isolation. Similarly, making raw data publicly available, like the kWh and data traffic indicators, can disclose competitively sensitive information.

Prevent risks of disclosure of confidential business information

Recommendation: **The Commission should provide a clear legal basis to ensure the confidentiality of information is maintained, especially given the absence at Member State level. This can be achieved by incorporating the suggested amendments outlined in the table below.**

The proposed new paragraph 4a in Article 5 of the DDA would require the Commission, European database and Member States to keep confidential the key performance indicators, other communicated information and the calculated sustainability indicators of data centres, including for purposes of responding to requests to access to information under Regulation (EC) 1049/2001 regarding public access to European Parliament, Council and Commission documents and Directive 2003/4/EC on public access to environmental information.

The proposed new paragraph 6 in Article 5 would require the Commission, European database and Member States to erase all KPIs and other reported information of data centres once the sustainability indicators have been calculated and in all cases within two years from the date they are reported. Until such clarity is established, the reporting of the long list of KPIs that include confidential business information should be delayed.

European Commission DDA	**Proposed Amendment**
n/a	New Recital 11a ***Pursuant to Article 12(1) of Directive (EU) 2023/1719, the information of data centres subject to Union and national law protecting trade and business secrets and confidentiality must not be made publicly available. Article 12(3) also requires that the European database be publicly available on an aggregated level. Thus, it is necessary to introduce measures to ensure that the key performance indicators and other information reported and the calculated sustainability indicators of data centres are kept confidential.***
Article 5 1. The European database shall consist of a common user interface ensuring that all reporting data centres are able to	Article 5 1. The European database shall consist of a common user interface ensuring that all reporting data centres are able to

input, in the same way, the information and key performance indicators referred to in Annexes I and II.	input, in the same way, the information and key performance indicators referred to in Annexes I and II.
2. The information and key performance indicators shall be made public in an aggregated manner, at Member State and Union level, in accordance with Annex IV.	2. The information and key performance indicators shall be made public in an aggregated manner, at Member State and Union level, in accordance with Annex IV.
3. Member States shall have access to all information and key performance indicators communicated to the European database in their territory pursuant to Article 3.	3. Member States shall have access to all information and key performance indicators communicated to the European database in their territory pursuant to Article 3.
4. The Commission shall have access to all information and key performance indicators communicated to the European database pursuant to Article 3.	4. The Commission shall have access to all information and key performance indicators communicated to the European database pursuant to Article 3.
5. The aggregated data collected under this Regulation can be reused for European statistics in line with the principles defined in the Regulation (EC) 223/2009.	***4a (new). The European database, Commission and Member States concerned shall keep confidential all information and key performance indicators communicated to the database pursuant to Article 3 and the sustainability indicators calculated in accordance with Annex III. Such information shall be considered confidential information affecting the commercial interests of operators and owners of data centres in accordance with Article 4(2) of Regulation (EC) 1049/2001 regarding public access to European Parliament, Council and Commission documents and Article 4(2)(d) of Directive 2003/4/EC on public access to environmental information.*** 5. The aggregated data collected under this Regulation can be reused for European statistics in line with the principles defined in the Regulation (EC) 223/2009.

	6 (new). The European database, Commission and Member States shall erase all information and key performance indicators communicated pursuant to Article 3 once the sustainability indicators of Annex III have been calculated and the aggregated data have been published and in all cases within two years since operators communicated it.

Rationale:

- The DDA requires reporting on each data centre, with the understanding that the published information will be in aggregated form. However, storing this data within the Commission's database raises concerns about potential reactive data publication in response to access requests from competitors and NGOs under existing transparency frameworks.
- Confidentiality exemptions are provided for in the EED, however, it is not clear which metrics this will apply to, and this does not provide protection against the potential disclosures mentioned in the above paragraph. Given that reporting is directed to the European database while subject to national laws, it remains uncertain whether industries can directly claim exemptions within the database.

Additional comments & questions

- ***Recital 6***: the Delegated Act should clarify what is meant by a 'report' - is this simply referring to the obligation to populate the data in the EU database, or is a written report also required?
- ***Article 3(2)***: the Delegated Act should clarify what is meant by ‘monitored’.
- ***Article 2(1)***: the Delegated Act should clarify what is considered a ‘structure’. It is not clear if a lab is considered a data centre.
- ***Article 2(5):*** the Delegated Act should clarify the situation in which the enterprise data centre is not managed by a physical/legal person, but rather by different teams within multiple organisations.
- ***Article 2(11):*** the definition of data centre floor area needs to be clearer. The Regulation EC 1099/2008 on energy statistics definition includes ‘as

well as related activities',[2] which allows for multiple interpretations of what is included and what is not, e.g. offices, logistic areas, parking lots, cantines, etc. There is a need for guidelines for mix-used buildings as a lack of those will lead to inconsistent reporting.

- ***Article 2(14) & 2(15)***: the terminology for installed IT power demand and rated IT load is not aligned with the standard being referenced across the DDA, i.e. EN 50600-2-2:2019. For consistency we recommend aligning with this standard.

- ***Annex I, paragraph 3:*** DIGITALEUROPE recommends including an additional open reporting field that allows data centre operators to add comments to their submissions. This could be used to capture any other relevant information (e.g. in the case of new data centres that are ramping up and have not yet reached their mature PUE, this can be noted here).

- ***Annex II, paragraph 2(a)****:* the Delegated Act must acknowledge the fact that it is not possible to measure SERT for all types of servers. SERT cannot be measured on data centre powered servers, only AC powered. Per the Ecodesign Lot 9 Guidelines: 'Testing of DC/DC only systems are not supported in SERT 2.0.1.' SERT does not capture the performance of accelerators which are playing an increasing role in data centres to serve Machine Learning demand – this will lead to inconsistent data if server power includes the contribution of accelerators. SERT data is also not available for custom servers, and it is not straightforward to perform industry benchmarks on such servers. We recommend including the following amendment:

'ICT capacity for servers shall be reported, as a minimum, for all new servers installed in the reporting data centre after the date that this Delegated Regulation enters into force. Reporting data centres shall report only on servers for which it is possible to measure SERT active state performance.'

- The Delegated Act should allow for the CPU performance value to be estimated from a published set of maximum performance values by CPU part number or from an estimation model built on a large SERT dataset by the Green Grid (TGG). The Commission needs to work with the industry to provide direction and assistance through guidance, to educate data centre operators on methodologies to estimate the ICT capacity for individual servers, groups of servers, or all the servers in a data centre.

Please find below DIGITALEUROPE's additional comments regarding the indicators outlined in Annexes I and II of the DDA.

[2] Regulation EC 1099/2008

Annex I: Information to be collected and communicated to the European database on data centres

Proposal in the DDA	DIGITALEUROPE's comments
(1) Information on the data centre	
(a) Data centre name **(b) Owner and operator** **(c) Location in the data centres** **(d) Type of data centre** **(e) Year and month of entry into operation**	Clarification is needed on the term 'owner,' whether it refers to the legal owner or to a specific business contact, such as a singular General Manager role.
(3) Information on the operation of the data centre	
(a) Electrical infrastructure redundancy level	While DIGITALEUROPE members do not have a uniform view of the adequacy of including these metrics in the data centre reporting scope, the following considerations might be helpful for the final review of the DDA: In terms of the definition, DIGITALEUROPE notes that the baseline 'N' is derived from the specific/unique design parameters of an individual data centre. This information should be used at the aggregated level to provide transparency about the statistical distribution of data centre facilities. Individual benchmarks between data centre facilities should be avoided. If it remains a reporting requirement, the information must be non-public and thus is available only to national competent authorities in Member States and the Commission. Any publication of this data by these actors should be anonymised and aggregated.
(b) Cooling infrastructure redundancy level	Same as the above for rationale.
(c) Total number of modular capacity steps	Same as the above. We recommend removing this indicator. If it remains, please add a definition of modular

	capacity steps and separately provisioned halls. This information should also be confidential.
(d) Total number of racks	Reporting on the number of racks is not a meaningful or helpful energy efficiency indicator. There is considerable rack dimension variability across data centres (rack width, rack height, variety of max. IT power and differences in how racks are populated: e.g., fully populated racks to racks that only have a couple of servers in them).

Annex II: Key performance indicators to be monitored, measured and communicated to the European database on data centres and the measurement methodologies

Proposals in the DDA	DIGITALEUROPE's comments
(1) Energy and sustainability indicators	
(a) Installed information technology power demand	The current paragraph allows operators to report three types of values, each being very different. DIGITALEUROPE suggests the Commission sets a single requirement to guarantee a consistent reporting metric across the Union in line with 'the common Union scheme for rating the sustainability of data centres […] with an installed information technology power demand of at least 500 kW.' As currently drafted, the three allowable options will give very different values, with the average power demand of the active IT equipment being 40 to 50% less than the installed information technology power demand and likely significantly less than the rated information technology load, which represents the kW of IT power demand that can be supported when the computer room floor area is fully populated with IT equipment. The significant difference in these values makes it inadvisable to offer these three options. The Commission should require data centre operators to

	calculate and report the 'installed information technology power demand', which allows the Commission to track the nominal capacity of the installed IT equipment.
(b) Data centre total floor area	Is this referring to data halls?
(d) Total energy consumption	There is disagreement among DIGITALEUROPE members regarding whether or not the contribution of backup generators should be included in EDC. There are different interpretations of CEN/CENELEC EN 50600-4-2 and whether this fuel use should be included in the calculation of PUE. We recommend that the Commission revisit this debate in future updates of the Delegated Act.
(e) Total consumption of information technology equipment	IT data is often measured through internal meters, which in some cases may not comply exactly with where the standards require the measurement to be located. PUE reporting should suffice for this. DIGITALEUROPE recommends deleting it.
(f) Electrical grid functions	Reporting on electrical grid functions is not relevant – this has no bearing on the energy performance of the data centre. An operator's participation in ancillary service markets is commercially sensitive information that data centre operators should not be required to share. There should be no requirement to report if we are not providing this service to the grid.
(g) Average battery capacity	Average battery capacity and battery time are also not relevant. This data would only provide an incomplete picture of the extent to which data centres provide grid services, since data centres can also utilise other on-site resources (e.g. IT load flexibility, on-site generation) to

	provide services to the grid. It does not make sense to only record data on battery capacity and time as this provides an incomplete picture.
(k) Waste heat reused	Please note that a comprehensive picture of this may require data and reporting from utility partners.
(l) Average waste heat temperature	As indicated in the Final Task A study, there is no standard for measuring the waste heat temperature.
(n) Type of refrigerant	The types of refrigerants that can be used are governed by separate European legislation The types of refrigerants used are commercially sensitive information, as this can reveal details of the cooling technology used. Moreover, this is one of the elements that the industry was not consulted on during the Technical Assistance Study. Further clarification is also necessary to determine whether this requirement specifically pertains to IT load space refrigerants or also encompasses split units used in administrative spaces.
(o) Cooling degree days	This is a field that can be automatically determined by the reporting tool based on the location of the data centre operator. Reporting accuracy can be improved and the amount of information that operators need to compile for reporting can be reduced by instead automatically populating cooling degree day based on location information already provided by the operator. According to Eurostat[3], cool climates are those that are at or below a cooling degree day measurement of 49.99 based on annual data in 2019 for the NUTS 2. Warm climates are those that are at or above a cooling degree day measurement of 50.00 based on annual data in 2019 for the NUTS 2.

[3] Eurostat. "Energy consumption in households by source." Eurostat Databrowser. [https://ec.europa.eu/eurostat/databrowser/view/nrg_chdd_a/default/table?lang=en]. Accessed [2 January 2024].

(p) Total renewable energy consumption	DIGTALEUROPE recommends clarifying what the geographic boundaries are for reporting on REF and that the basis for the calculation should be on full site consumption not just IT load. Our concern with the basis of IT load is that it will not align with other reporting and would lead to lower data quality. It is important to note that ERES-TOT as defined in the CEN/CENELEC EN 50600-4-3 does not set a geographic boundary for where the Guarantees of Origin (GOs) can be sourced from. This means that operators can purchase GOs from one country and retire them in a different country in the accounting for REF. Thus, an operator can declare a data centre as having a REF of 100%, without buying any renewable energy in the country where the data centre is operating.
(r) Total renewable energy consumption from Power Purchasing Agreements	GOs are not retired per site, but per region. DIGITALEUROPE asks for more information and for the Commission to clarify if it is acceptable to retire them per site/country or within that region (e.g within AIB).
(2) ICT capacity indicators	
(a) ICT capacity for servers	DIGITALEUROPE had no consensus in the past over the indicators for the ICT capacity for servers. The following are recommendations to consider. Due to the lack of a standardised methodology for measuring server capacity and storage, the Commission should allow maximum flexibility, to allow estimation or calculation of the ICT capacity through other methods at least in the first reporting period. The active state performance value declared for (EU) 2019/424 is for a minimum and maximum server configuration, which will make it difficult to make an interpolation. The Commission needs to work with the industry to provide direction and assistance through guidance, to educate data centre operators on methodologies to estimate the ICT capacity for individual servers, groups of servers, or all the servers in a data centre.

	According to the latest ICF's preparatory study on Lot-9 Ecodesign review, 'data centre servers currently are not tested under the SERT testing metric'.[4] For those servers that do fall under Commission Regulation EU 2019/424, we recommend referencing EN 303470 v1.1.1 (2019-03) 5.2.b.5 or providing the text and equation from the section: 'ICT capacity is determined using the geometric mean of the 7 SERT™ CPU worklets at the 100 % interval performance values.' In addition, a specific date should be set to determine when this data point is determined for reporting purposes, such as 31 December of the reporting calendar year. Overall, IT Capacity indicators should also be treated as confidential information as disclosure presents security and competition risks.
(3) Data traffic indicators	
(a) Incoming traffic bandwidth	This indicator is not included in Annex VII, and it was not consulted on as part of the Technical Assistance Study. This information is also not relevant for evaluating the energy performance of the data centre and we therefore recommend its removal. As an example of its lack of relevance to energy efficiency performance, outgoing bandwidth will be very high for a data centre supporting content streaming, but the energy use of the servers will be small compared to the energy use for a high-performance computing application which will likely demand a small quantity of bandwidth.
(b) Outgoing traffic bandwidth	This indicator is not included in Annex VII, and it was not consulted on as part of the Technical Assistance Study. This information is also not relevant for evaluating the energy performance of the data centre and we therefore recommend its removal.

[4] ICF Study for the review of Commission Regulation 2019/424 Ecodesign of Servers and Data Storage Products, Stakeholder Meeting, 28 September 2023.

(c) Incoming data traffic	These proposed metrics are i) challenging or even impossible for data centre operators to collect, ii) commercially sensitive, which could create competition and security concerns and iii) do not measure the sustainability of the sector. These requirements are not drivers for energy and water usage. Equally, our understanding of 'data stored and processed' and 'data traffic' being listed as an indicator is for the EU to better track improvements in IT equipment efficiency in data centres. To measure this, DIGITALERUOPE recommends identifying a suitable KPI to measure IT efficiency within the Sustainability Indicator process as the indicators proposed do not do that. We emphasise once more that reporting on the raw 'input data' is highly unfeasible as this is very challenging to collect.
(d) Outgoing data traffic	Same as the above.

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About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory environment that enables European businesses and citizens to prosper from digital technologies. We wish Europe to grow, attract, and sustain the world's best digital talents and technology companies. Together with our members, we shape the industry policy positions on all relevant legislative matters and contribute to the development and implementation of relevant EU policies, as well as international policies that have an impact on Europe's digital economy. Our membership represents over 45,000 businesses who operate and invest in Europe. It includes 106 corporations which are global leaders in their field of activity, as well as 41 national trade associations from across Europe.

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