



ANNEX - DIGITALEUROPE Member Priorities Survey 2025

DATA ECONOMY POLICY GROUP	5
AI Act Implementation.....	5
AI and data contract rules for the digital economy.....	5
AI in the workplace	5
AI Liability Directive	5
AI standardisation	5
Audiovisual Media Services Directive (AVMSD): Implementation & Review.....	6
Child sexual abuse material (CSAM) Regulation.....	6
Cloud and AI Development Act (CAIDA).....	6
Copyright & AI.....	6
Data Act implementation.....	6
Digital Fairness Act.....	6
Digital Markets Act (DMA) implementation	7
Digital Services Act (DSA) implementation	7
Digital Simplification Package (AI, Data & Cyber)	7
ePrivacy follow up.....	7
EU IPR policy.....	7
European Data Union Strategy	7
European Media Freedom Act implementation	8
EU-UK personal data flows	8
EU-US personal data flows	8
GAIA-X	8
GDPR Review & Implementation	8
Private Copying Levies	8
Product Liability Directive implementation.....	9
Protection of Minors Online.....	9
Right to Repair Directive implementation	9
DIGITALLY ENABLED TRANSFORMATIONS POLICY GROUP	10
AI in Financial Services.....	10

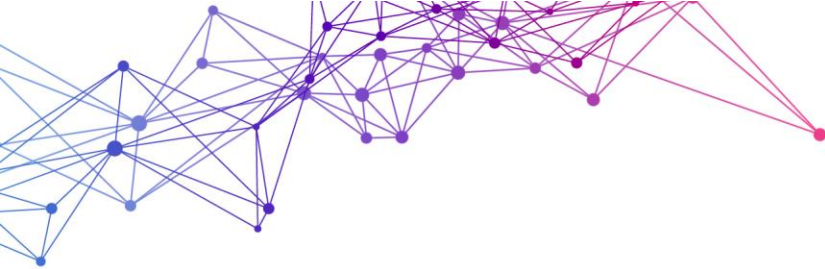
DIGITALEUROPE

Rue de la Science, 37, B-1040 Brussels
+32 2 609 53 10 ► Info@digitaleurope.org

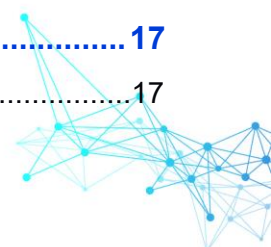
► www.digitaleurope.org

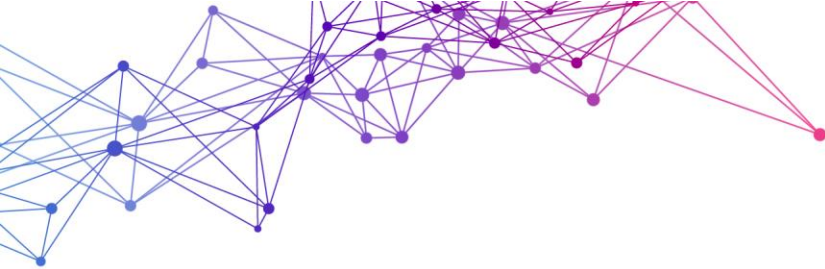
EU Transparency Register: 64270747023-20



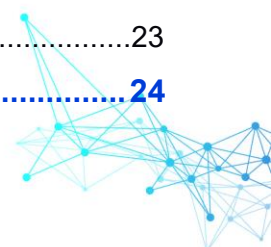


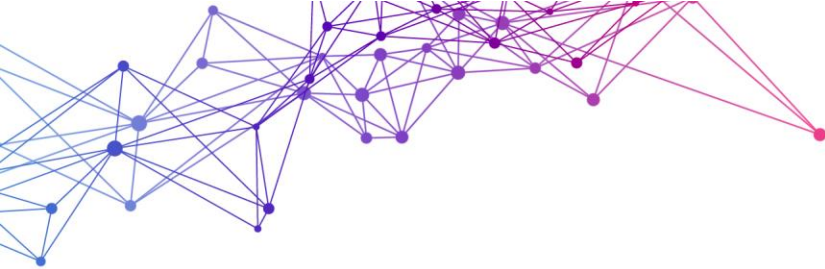
AI in healthcare.....	10
Automotive Action Plan.....	10
Autonomous Driving.....	10
Crypto assets and stable coins.....	10
Delegated Act on rating scheme for data centres.....	11
Digital Euro.....	11
Digital Operational Resilience Act (DORA).....	11
Electrification Action Plan.....	11
Energy Efficiency Package.....	11
EU initiatives on cybersecurity of hospitals and life sciences.....	11
European Grids Package.....	12
Financial Data Access Regulation (FIDA).....	12
Health Data (European Health Data Space).....	12
Heating and Cooling Strategy.....	12
In-Vehicle Data.....	12
Multimodal digital mobility services.....	13
Payment services.....	13
Roadmap for Digitalisation and AI in energy.....	13
Roadworthiness Package.....	13
Savings and Investment Union.....	13
Water Resilience Strategy.....	14
INTERNATIONAL RELATIONS AND TRADE POLICY GROUP.....	15
EU-China relations.....	15
EU-India relations.....	15
EU-Japan relations.....	15
EU-UK relations.....	15
EU-US relations.....	15
International dimension of priority issues (AI, Cyber, Green, etc.).....	15
Multilateral trade and economic engagements (WTO).....	16
Trade barriers to non-EU markets (MAAC).....	16
Trade Climate & Customs Measures (CBAM).....	16
Trade Security Measures (export controls).....	16
RESILIENCE AND INFRASTRUCTURE POLICY GROUP.....	17
Cyber Resilience Act.....	17



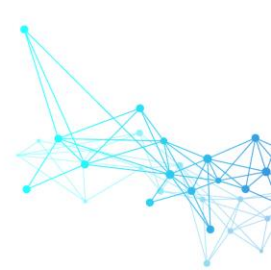


Cybersecurity Act revision	17
Cyber Solidarity Act	17
Cybersecurity Standardisation	17
Digital Defence: Shaping EU and NATO Defence Investments	17
Digital Networks Act (including spectrum)	18
Digital Simplification Package (AI, Data & Cyber)	18
European Business Wallet	18
EU Common Criteria Certification Scheme (EUCC)	18
EU Cloud Security Certification Scheme (EUCCS)	18
EU Cyber Toolbox	19
Harmonisation of cyber rules	19
NIS 2 Directive	19
Public Private Partnerships	19
Revision of Cybersecurity Blueprint	19
Revision of Public Procurement Directives	19
Stakeholder Cybersecurity Certification Group	19
SINGLE MARKET AND COMPETITIVENESS POLICY GROUP	20
28th regime for businesses	20
Collaboration with European Standardisation Organisations (ESOs)	20
Common Charger	20
Critical Raw Materials Act	20
Digital Product Passport	20
Electromagnetic Compatibility (EMC)	21
European Chips Act 2.0	21
European Standardisation Strategy	21
Horizon Europe	21
Investment & Incentives (incl. EIB, TechEU, Scaleup Fund)	21
Multi-annual Financial Framework negotiations (incl. European Competitiveness Fund)	22
New Legislative Framework (NLF)	22
Quantum Act	22
Radio Equipment Directive (RED)	22
Strengthening the Single Market (barriers reduction)	22
Union of Skills: Tech Talent and Digital Education	23
SUSTAINABILITY POLICY GROUP	24





Sustainability Omnibus (CSRD, ESRS, CS3D & Taxonomy)	24
Batteries Regulation (sustainability, safety & due diligence).....	24
Circular Economy Act	24
Ecodesign for Sustainable Products Regulation (ESPR) Horizontal Framework	24
EU Deforestation Regulation.....	24
EU Persistent Organic Pollutants Regulation	25
Environmental omnibus	25
Forced Labour Regulation	25
Green Claims Directive	25
Lot 3 (Computers and computer servers).....	25
Lot 4 (printers)	25
Lot 5 (electronic displays)	26
Lot 6/26 (Standby, networked standby, and off mode)	26
Lot 7 (external power supplies).....	26
Lot 9 (servers and data storage products).....	26
Packaging and Packaging Waste Regulation.....	26
REACH restrictions & PFAS	26
REACH revision & chemicals industry package	26
RoHS revision and exemptions.....	27
Waste Shipments Regulation.....	27
WEEE Directive	27





DATA ECONOMY POLICY GROUP

AI Act Implementation

Regulation setting rules for developers and users of AI models and applications, with the objective to ensure that AI does not threaten people's fundamental rights, health or safety. Entry into application of the various rules is gradual, from February 2025 to August 2027, with intense preparatory work in the meantime on standards, guidelines, codes and secondary legislation, as well as on related international initiatives. Changes to the AI Act are expected with the 'Digital simplification package' to be published by end 2025.

AI and data contract rules for the digital economy

This initiative aims to establish potential rules for AI-automated and data contracts at EU level, based on negotiations taking place at the UN. On AI contracting, a UN model law is now available, and the Commission plans to publish a study in 2026 to assess if new legislation is needed. On data contracts, work at UN level will not be completed before 2026. In the meantime, the Commission will monitor the uptake of its voluntary model contractual terms under the Data Act.

AI in the workplace

Potential rules to supervise the use of AI in the workplace. Such rules could include safeguards and protections of employees that may use AI or be subject to AI decisions, including transparency and consultation rules. This could build on the AI Act framework. Note that this is speculative, as no legislative package or initiative has been officially confirmed by the European Commission, but the European Parliament is preparing a report on the topic for end 2025.

AI Liability Directive

The AI Liability Directive proposed common liability rules for AI in national fault-based liability regimes, alleviating victims' burden of proof for AI-caused damages through rebuttable presumption and evidence disclosure. While reportedly withdrawn by the Commission in July 2025, aligning with DIGITALEUROPE's request, this hasn't been formally confirmed, and concerns remain that Parliament may revive the topic.

AI standardisation

Harmonised AI standards will be central to implementing the EU AI Act, offering companies presumption of conformity once published in the Official Journal of the EU. These standards will provide guidelines and detail how to apply the Act's high-risk AI requirements, thus lowering compliance costs and providing legal certainty. In 2023, the European Commission mandated CEN-CENELEC to draft these standards, a process led under the Joint Technical Committee 21 (JTC 21). As a partner organisation to CEN-CENELEC, and a member of JTC21, DIGITALEUROPE monitors the work, joins plenary sessions and regularly provides comments and updates.



Audiovisual Media Services Directive (AVMSD): Implementation & Review

The AVMSD regulates the audiovisual market across the EU, promoting cultural diversity and consumer protection. The upcoming review (2026) will address new challenges in digital media, including streaming services and online platforms, to maintain a balanced regulatory environment.

Child sexual abuse material (CSAM) Regulation

In May 2022, the European Commission proposed rules requiring platforms to proactively detect, report, and remove CSAM online, and discussions continue in the Council as the Danish presidency pushes for stricter measures amid significant opposition. A tentative voting on the legislation is expected in Q4 2025.

Cloud and AI Development Act (CAIDA)

The future legislative proposal, expected for March 2026, will have 3 main objectives: 1) actions to increase the secure processing capacity of EU-based cloud providers (potentially via public procurement rules), 2) research & innovation to accelerate the greening of compute infrastructures and data centres for cloud and AI; 3) facilitation of private investment in sustainable cloud and AI capacity, to triple the EU's data processing capacity in the next 5 to 7 years. DIGITALEUROPE is currently consulting the membership to prepare a position paper for future advocacy actions.

Copyright & AI

With the rapid development of AI models, the European Commission is working on the issues arising from the interaction between copyright and generative AI. This includes the potential copyright infringement by generative AI developers, through the use of copyright-protected materials to train their models – often collected through techniques known as 'mining'. These discussions are notably being addressed at policy level through the implementation of the EU Copyright Directive and AI Act. The European Parliament is preparing a report on the topic for early 2026.

Data Act implementation

This Regulation entered into application in September 2025. It mandates data sharing from connected products to businesses, individuals, third parties, and governments (in certain cases). It also regulates cloud switching for businesses and requires data services providers to prevent unlawful third-country data access. DIGITALEUROPE provides guidance input to the Commission, participates in data sharing and cloud switching subgroups, monitors implementation, and advocates for the inclusion of this act in the scope of the 'Digital simplification package' and future fitness checks.

Digital Fairness Act

The Digital Fairness Act is an upcoming EU legislative proposal which aims to address challenges and harmful practices that consumers face online. The proposal is expected to cover subscription services, influencer marketing, personalisation practices (advertising, prices), dark patterns, age verification, and design interface, including horizontal obligations such as 'fairness by design', a redefinition of the average consumer, and a reversal of the burden of proof in consumer law. A public consultation is ongoing and a legislative proposal is expected in Q3 2026.



Digital Markets Act (DMA) implementation

The Digital Markets Act sets out to regulate (ex-ante) the commercial activities of 'gatekeeper platforms'. A review of the DMA is planned for 2026, with the Commission seeking feedback on its effectiveness, impact on business, obligations and potential scope expansion, especially with regards to online social networking services and the AI sector.

Digital Services Act (DSA) implementation

The DSA sets out liability and due diligence rules for internet based services with regards to illegal content, along with a governance & enforcement systems. As per Art. 91, a review of the DSA is planned for November 2025, and a revision exercise on its interplay with other legislations is expected on Q4 2025.

Digital Simplification Package (AI, Data & Cyber)

This issue will be addressed through joint efforts of the Data Economy and Resilience & Infrastructure PGs, specifically under the AI & Data and the Cybersecurity WG.

The European Commission is preparing a “Digital Omnibus” proposal by the end of 2025 to simplify and align multiple overlapping digital laws, especially on AI, cyber and data. We want this proposal to be an ambitious one so as to meet our 50% target reduction of red tape that is stifling innovation and undermining competitiveness in Europe. DIGITALEUROPE published a thought leadership paper in June with priority simplification recommendations, has participated in several consultations over the summer and is actively engaging with relevant Commissioner Cabinets, MEPs and national ministries to ensure our recommendations are taken up.

ePrivacy follow up

After years of failed negotiations around the ePrivacy Regulations, the Commission has withdrawn the existing proposals and put forward alternative legislations, including a possible amendment of Art.5(3) of the ePrivacy Directive in the Digital Omnibus.

EU IPR policy

The Commission's new IP Action Plan outlines the initiatives and strategy of the Commission towards the enforcement and potential legislative review of the EU's IPR framework. It includes plans on copyright, patents, trade secrets, IPR enforcement, licensing and relations with 3rd countries on counterfeit and IP protection.

European Data Union Strategy

The European Data Union Strategy is expected to be published on 29 October 2025 and is likely to propose new legislative initiatives and simplification measures. It aims to simplify and enhance data sharing for companies and administrations across the EU, ensuring privacy and security while boosting productivity through a simplified, clear and coherent legal framework. It also will introduce measures to protect EU sensitive non-personal data from cross-border transfers.



European Media Freedom Act implementation

The European Media Freedom Act is the legislation aimed at ensuring that the EU media market functions better by improving legal certainty and eliminating internal market obstacles. The rules will establish a mechanism to increase the transparency, independence and accountability of actions affecting media markets, freedom and pluralism within the EU.

EU-UK personal data flows

In June 2023, the EU adopted an adequacy decision for the United Kingdom- with a sunset clause. It was then renewed until December 2031, after which the adequacy decision could expire. Negotiations are thus ongoing, particularly as the UK is in the process of adapting to the new Data Use (and access) Bill.

EU-US personal data flows

In December 2022, the European Commission launched the process to adopt an adequacy decision for the EU-U.S. Data Privacy Framework, to foster trans-Atlantic data flows and address the concerns raised by the Court of Justice of the European Union in its Schrems II decision of July 2020. As a result, the adequacy decision was adopted and came into force on 11 July 2023. It was challenged by French MP Latombe, on grounds that the framework did not guarantee a level of protection equivalent to the one ensured in the EU. In September 2025 the CJEU dismissed Latombe's action for annulment and the Trans-Atlantic Data Privacy Framework has been safeguarded. This is however on condition that the EU monitors and reacts to any changes to US law.

GAIA-X

Gaia-X is an industry-led initiative aiming to create an ecosystem of cloud providers following common rules and norms, notably via certification. Cloud users also participate in the Gaia-X ecosystem. Gaia-X also plans to support the implementation of European data spaces. DIGITALEUROPE is represented at Gaia-X Board of Directors 2025-2027.

GDPR Review & Implementation

The EDPB plans to issue guidelines notably on anonymisation and regulations derived from the EU Strategy (inc. AI Act). We will respond to relevant consultations and actively participate in the GDPR Multistakeholder Expert Group. The European Commission reviews the GDPR every four years. We have advocated not to reopen the GDPR at this stage, but to strengthen data transfers tools and harmonisation. However at least one GDPR Reform is taking place under the Omnibus for SMEs. A second is under consideration by the European Commission.

Private Copying Levies

DIGITALEUROPE-led work attempting to reform / abolish the private copying levies system in Europe. Such taxes are currently impacting a broad range of hardware products such as phones or laptops, and are now being expanded to cloud and refurbished products in certain EU countries.



Product Liability Directive implementation

This Directive from 1985 on the liability of damage caused by physical products has been revised in 2024, with a major scope expansion to include software, including AI as well as a broader definition of damage, now also covering medically-recognised psychological health issues and irreversible loss or corruption of data.

Protection of Minors Online

In July 2024 the Commission launched a call for evidence in support of future guidelines or regulation on the protection of minors online. The Commission has been seeking feedback on the proposed scope of the guidelines and good practices and recommendations on risk mitigation measures. This could result in EU-wide age assurance or parental controls rules with implications on other legislations such as DFA and DSA.

Right to Repair Directive implementation

Adopted in June 2024, amending the Sale of Goods Directive, the Right to Repair Directive aims to strengthen consumers' ability to have products repaired both within and beyond the legal guarantee. Industry will need to adjust repair practices and align them with sustainability considerations.





DIGITALLY ENABLED TRANSFORMATIONS POLICY GROUP

AI in Financial Services

In June 2024, DG FISMA launched a targeted consultation on Artificial Intelligence in the financial sector to assess its applications and impacts across different use cases. The Commission does not intend to propose new legislation specifically on AI in finance at this stage. Meanwhile, the European Parliament's ECON Committee is finalising a non-legislative report on the topic.

AI in healthcare

In her 2024–2029 political guidelines, President von der Leyen announced an “Apply AI Strategy,” due on 7 October 2025, to strengthen industrial AI applications and improve public services, including healthcare. At the same time, DG SANTE has published a report on AI in health, setting out measures to drive adoption and unlock the sector's potential. DIGITALEUROPE will work to promote stronger alignment between sectoral and horizontal legislation and help shape investments to maximise the benefits of AI in healthcare.

Automotive Action Plan

The EU Automotive Action Plan, presented in March 2025, is a European Commission initiative to bolster the competitiveness of the EU automotive industry by accelerating its transition to clean, connected and automated vehicle. Key objectives include strengthening supply chains, promoting innovation in software and AI, expanding market access, and ensuring a skilled workforce. DIGITALEUROPE responded to the public consultation launched in January 2025 which inspired this Action Plan.

Autonomous Driving

As listed in the Automotive Action Plan, the European Commission is pursuing a more harmonised regulatory framework to enable the development of autonomous vehicles (AVs) and advanced driver assistance systems (ADAS) across the EU. This may include various initiatives to be expected in 2026. DIGITALEUROPE is advocating for effective roll-out of these innovative driving systems.

Crypto assets and stable coins

While the U.S. adopted the Genius Act regulating stablecoins, Europe advances work on the digital euro and wholesale Central Bank Digital Currency (CBDC). Since December 2024, the Markets in Crypto-Assets (MiCA) Regulation provides harmonised EU framework for consumer protection and market integrity. Ahead of its 2027 review, the Commission plans a Q&A to support compliance and address European sovereignty versus U.S. dollar-denominated stablecoins. The interplay between cryptocurrencies and CBDCs (retail and wholesale) offers DIGITALEUROPE opportunities to contribute through thought-leadership and technical position papers.



Delegated Act on rating scheme for data centres

Following the first delegated act on the reporting scheme for data centres under the recast Energy Efficiency Directive (EED), the European Commission is preparing a second delegated act to establish a common Union-wide sustainability rating scheme. This measure will introduce a labelling/rating system to assess the energy efficiency and environmental performance of data centres across Europe. The scheme is intended to enhance transparency, drive best practices and support the EU's broader climate and digital transition goals. The draft delegated act is expected to be published in Q1 2026.

Digital Euro

On 28 June 2023, the European Commission proposed a Regulation to establish a Digital Euro, an electronic form of cash complementing banknotes and coins. The digital euro aims to ensure secure payments, safeguard monetary stability and sovereignty, and foster competition in the payments sector. Following the US Genius Act, co-legislators aim to accelerate negotiations. The Danish Council Presidency targets a general approach by end-2025, with Parliament's ECON Committee preparing in Q4 2025. Trilogues are expected in 2026.

Digital Operational Resilience Act (DORA)

The Digital Operational Resilience Act (DORA) establishes a comprehensive framework to strengthen the digital resilience of EU financial entities. It sets rules on ICT risk management, resilience testing, cyber threat information sharing, and oversight of ICT third-party risks and incidents. Applicable since 17 January 2025, DORA tasks the European Supervisory Authorities with designating Critical ICT Third-Party Providers (CTPPs) and initiating their oversight by the end of 2025.

Electrification Action Plan

The Electrification Action Plan, with a planned adoption in Q1 2026, will ensure an industrial transition powered by an energy system with homegrown, clean electricity. The plan will aim to: 1) Accelerate the shift from fossil fuels to clean electricity across all sectors; 2) Target a 32% economy-wide electrification rate; 3) Align sector strategies to scale clean electricity in transport, buildings, and industry.

Energy Efficiency Package

At the IEA Global Energy Efficiency Conference in June, the European Commission announced plans to publish a Data Centre Energy Efficiency Package in Q1 2026, alongside the Strategy Roadmap on Digitalisation and AI. The package will include the second draft delegated act under the Energy Efficiency Directive (EED), establishing a common Union-wide rating scheme for data centres, as well as the announcement of minimum performance standards (MPS).

EU initiatives on cybersecurity of hospitals and life sciences

In January 2025, the European Commission published the EU Action Plan for the Cybersecurity of Hospitals and Healthcare Providers, reflecting several of DIGITALEUROPE's recommendations, notably on strengthening public-private collaboration. Implementation will take place in the coming years, supported by stakeholder expertise through the newly established Health Cybersecurity Advisory Board, to which DIGITALEUROPE has been officially appointed.



European Grids Package

The European grid package, aimed to be published Q4 2025, aims to enhance the EU's competitiveness by helping individuals and businesses to access affordable, secure and clean energy. Proposed measures will include: 1) accelerating the upgrade, digitalisation and expansion of the European grid infrastructure; 2) Removing bottlenecks and increasing overall efficiency and resilience; 3) Streamline the legal framework for European grids (e.g. Trans-European Networks for Energy (TEN-E)) and 4) Ensure the cross-border integrated planning and delivery of projects, especially on interconnectors.

Financial Data Access Regulation (FIDA)

The Financial Data Access Regulation (FIDA) seeks to improve customer access to financial data by requiring participation in data-sharing schemes. Ongoing trilogue discussions aim to preserve its core objectives while lowering industry compliance costs. Key political decisions include whether to adopt a market-driven approach and how to regulate gatekeepers, with possible partial or full exclusion. The proposal's future is uncertain, and withdrawal cannot be ruled out if trilogues are not concluded by end-2025.

Health Data (European Health Data Space)

The EHDS was published in the Official Journal of the EU on 5 March 2025, with most obligations for manufacturers and health data holders applying between 2029–2031. Implementation has already begun, with the Joint Action projects TEHDAS2 and Xt-EHR providing technical guidance to the Commission. Between 2026 and 2027, key areas must be clarified through implementing legislation/guidance, including harmonisation, EHR and technical specifications, governance of secondary data use, and rules on IP and trade secrets, etc. DIGITALEUROPE is engaging in all dimensions of political and technical implementation work.

Heating and Cooling Strategy

The Commission plans to publish a new Heating and Cooling Strategy in Q1 2026 to accelerate decarbonisation through efficiency, electrification, renewable-based solutions, and stronger energy system integration. Building on the 2016 EU Heating and Cooling Strategy, which mapped consumption in buildings and industry and introduced measures later embedded in the Clean Energy for All Europeans package adopted in 2019, relate to increasing renewable energy and energy efficiency in this sector, while applying in parallel an integrated approach to the energy system. The update will also create opportunities for digital technologies to optimise energy use, while rising electrification increases demand on grids, data centres, and smart solutions.

In-Vehicle Data

In September 2025, the European Commission has issued sector-specific guidance under the Data Act to address the sharing and use of in-vehicle data within the automotive sector. A legislative initiative may follow at a later stage if deemed necessary. First outlined in the Automotive Action Plan in March 2025, the guidance seeks to balance fair data access, consumer rights, and innovation opportunities.



Multimodal digital mobility services

The Commission is exploring a proposal, potentially under the ‘Single Digital Booking and Ticketing Regulation’, to support multimodal digital mobility services (MDMS). Also referred to as Mobility as a Service (MaaS), the initiative seeks to integrate different modes of transport (e.g. buses, trains, bikes) into seamless digital platforms for ticketing and planning. Its objectives include reducing travel time and emissions while enhancing passenger convenience. DIGITALEUROPE is closely monitoring developments.

Payment services

The new Payment Services package aims to boost fraud prevention in the payments sector. Trilogue talks since July 2025 focus on liability rules for financial entities, and possibly online platforms and telecom providers, to address impersonation fraud, scams, and other risks. Negotiations also cover transparency for card scheme networks and measures to expand Open Banking, while ensuring alignment with FIDA and other EU legislation.

Roadmap for Digitalisation and AI in energy

The Roadmap for Digitalisation and AI in the Energy Sector will build on the 2022 Digitalisation of Energy Action Plan. The public consultation runs until 5 November 2025, with publication expected in Q1 2026. This may pave the way for additional initiatives under the roadmap. It will emphasise AI’s benefits, risks, and safeguards for electricity grids, defining how AI can: 1) optimise grids and enhance resilience; 2) address its energy footprint, especially in data centre hotspots; 3) support planning and grid integration of data centres. DIGITALEUROPE is working on promoting to build an AI ready and sustainable grid infrastructure, that enables scalable AI solutions for grid optimization, while ensuring alignment across regulations.

Roadworthiness Package

The Roadworthiness Package is an EU initiative to adapt vehicle inspection requirements in response to technological and regulatory developments. It consists of the proposed revision of three Directives, published in April 2025. As vehicles become increasingly digitalised and complex, the package aims to modernise inspection practices, including the exchange of roadworthiness data at EU level. This could lead to burdensome or illogical obligations if the complexities of advanced driving systems are not sufficiently taken into account. DIGITALEUROPE is currently developing its recommendations.

Savings and Investment Union

The Savings and Investments Union (SIU) aims to promote the integration of European capital markets. Its objectives are to mobilise Europeans’ savings into long-term investment, enhance equity financing to support innovation, streamline the functioning of trading and post-trading infrastructure, and harmonise the supervision of financial entities. To advance these objectives, the European Commission plans to present a package of legislative and non-legislative initiatives between Q4 2025 and 2026.



Water Resilience Strategy

In June 2025, the European Commission published the Water Resilience Strategy, setting out measures to restore and protect the water cycle, guarantee access to clean and affordable water, and foster a sustainable, resilient, smart, and competitive water economy in Europe. For the data centre sector, the Strategy introduced water usage as a parameter in the forthcoming Union-wide sustainability rating scheme and proposed minimum water consumption standards. Starting in December 2025, the Commission will convene a biennial Water Resilience Forum, bringing together EU stakeholders to support dialogue and advance the Strategy's implementation.



INTERNATIONAL RELATIONS AND TRADE POLICY GROUP

EU-China relations

The goal of this issue is to improve the business and trade environment in China for DIGITALEUROPE members. As such, it looks at EU-China bilateral relations, discrimination against European companies in China, data localisation, and other potentially burdensome regulations. EU unilateral measures are also monitored, as is potential international cooperation (e.g. WTO, trilateral).

EU-India relations

The EU and India have resumed negotiations towards an EU-India FTA alongside the launch of the EU-India TTC in 2022. Despite progress, market access issues continue to persist. Our priority is to advocate for fair conditions and open trade including international market access in India.

EU-Japan relations

As global digital and trade rules evolve rapidly, strengthening the EU-Japan partnership is essential. DIGITALEUROPE has shifted focus from the EU-Japan EPA (now implemented smoothly) to the broader EU-Japan partnership on trade and digital issues, shaping future ambition, rules, and regulations. This work includes participation in EU-Japan dialogues and joint committees, promoting multilateral cooperation (WTO, Trilateral), and our October Japan mission for direct stakeholder engagement. Notable successes include the EU-Japan Digital Partnership and Data Flow Agreement.

EU-UK relations

DIGITALEUROPE members are monitoring key bilateral developments with the UK. Note that adequacy and related issues are handled in the Privacy WG.

EU-US relations

Amid an increasingly complex geopolitical landscape, strong transatlantic cooperation is more critical than ever, and DIGITALEUROPE's established presence in the US positions us to engage effectively with government and industry stakeholders. This issue encompasses DIGITALEUROPE's work around EU-US Relations, across a number of areas (in particular on trade and tariffs, Economic Security, AI, Cyber). As part of this issue we monitor and promote bilateral cooperation with the US, including on critical technologies, export controls, data flows, and multilateral initiatives. There is a recognition that the 'partnering' aspect of the European Economic Security Strategy will necessitate a strong transatlantic collaboration. Our work on the US Presence and events and engagements in the US with USG and other stakeholders are allocated under this issue. Note that adequacy and related issues are handled in the Privacy WG.

International dimension of priority issues (AI, Cyber, Green, etc.)

This issue covers our activities in the Tech7. Recognising the increasing internationalisation of key files on Cyber, AI and green technologies, we engage with relevant working groups and content owners with a view to ensuring our positions are well represented at the international level.



Multilateral trade and economic engagements (WTO)

Amid heightened political complexity in global trade, this work is urgent and essential. The WTO eCommerce Joint Statement Initiative aims to develop global digital trade rules and make the moratorium on customs duties on electronic transmissions permanent. Despite a stabilised text, unanimity negotiations remain difficult with some developing countries blocking progress. This also affects the WTO Moratorium, where DIGITALEUROPE has advocated substantially and secured previous extensions. Ensuring another extension at the 14th WTO Ministerial Conference (MC14) will be challenging but critical. We continue advocating on the Information Technology Agreement (ITA) 1, ITA 2, and their possible expansion.

Trade barriers to non-EU markets (MAAC)

DIGITALEUROPE sits in the Market Access Advisory Committee, a consultative body run by DG Trade. This is a means to provide practical input to the Commission to improve market access, and more generally, to strengthen the visibility and importance of digital trade within DG TRADE.

Trade Climate & Customs Measures (CBAM)

Under this issue we follow up on the development of custom-related issues of importance to the wider membership. The EU's Carbon Border Adjustment Mechanism (CBAM) is an issue previously discussed.

Trade Security Measures (export controls)

In the current context of rising geopolitical and economic security pressures, ensuring robust yet balanced controls on sensitive technologies is crucial. This issue addresses a range of initiatives under the 'protect' pillar of the EU's Economic Security Strategy. These include dual-use export controls and intangible technology transfers (ITT), where DIGITALEUROPE has been a strong advocate for rules that reflect the realities of digital innovation and competitiveness. In this context, we are developing a position paper on proposed guidelines regarding the application of export controls under the Dual-Use Regulation (EU) 2021/821 to ITT. Other potential emerging file is outbound investment.





RESILIENCE AND INFRASTRUCTURE POLICY GROUP

Cyber Resilience Act

The CRA establishes a legislative framework aiming to achieve a high common level of cybersecurity in the EU, by means of introducing cybersecurity requirements for the design, development, production, and life cycle of products with digital elements. It will be applicable from December 2027, though reporting obligations will kick in from September 2026. DIGITALEUROPE advocates for a manageable CRA, and we are currently working on the development of secondary legislation (approximately 17 implementing and delegated acts). Our input is channeled through the Commission's CRA Expert Group, of which we are a member.

Cybersecurity Act revision

The Cybersecurity Act prescribes that the Commission is to regularly evaluate the CSA and publish a report with its findings. The Commission is expected to present its legislative proposal amending the Cybersecurity Act in November 2025. This is an opportunity to make the EU cybersecurity certification scheme framework (EUCCS, EUCC, EU5G) more effective, as well as to improve functioning of the Stakeholder Cybersecurity Certification Group (SCCG) and ENISA. DIGITALEUROPE is a member of the SCCG.

Cyber Solidarity Act

The EU Cyber Solidarity Act strengthens the EU's capacity to detect, prepare for, and respond to cybersecurity threats by fostering cooperation, pooling resources, and establishing a European Cyber Reserve. It promotes harmonisation and scalability in cybersecurity measures, including streamlined EU certification schemes, safeguarding critical infrastructure and digital ecosystems while advancing EU strategic autonomy in cybersecurity.

Cybersecurity Standardisation

Harmonised standards will be central to the Cyber Resilience Act, offering presumption of conformity once published in the Official Journal of the EU. These standards detail how to apply essential cybersecurity requirements, thus lowering compliance costs and providing legal certainty. In 2023, the Commission mandated European standardisation organisations to draft standards under CEN-CENELEC's Joint Technical Committee 13 (JTC 13). As a CEN-CENELEC partner and JTC13 member, DIGITALEUROPE monitors work, joins sessions, and provides comments. The Public Enquiry will open in December 2025, and the Planned Publication of Standards is expected in October 2026.

Digital Defence: Shaping EU and NATO Defence Investments

DIGITALEUROPE is leading Europe's digital defence transformation by tackling regulatory fragmentation, driving dual-use innovation, and ensuring that industry's digital priorities are integrated into EU and NATO defence planning. We are actively influencing flagship initiatives such as NATO's Rapid Adoption Action Plan and the EU Defence Readiness Omnibus, positioning digital technologies at the centre of capability development and defence budgets. Our engagement encompasses the full spectrum of investment instruments, ranging from SAFE loans and the European Defence Fund to the European Investment Bank, the European Competitiveness Fund, NATO's Defence Investment Pledge, DIANA, and the NATO Innovation Fund, helping to align funding with operational needs.



Digital Networks Act (including spectrum)

A white paper on new telecoms legislation (often referred to as DNA White Paper) was published February 2024, outlining 12 scenarios covering cloud-enabled connectivity, spectrum, quantum encryption, and submarine cables. DIGITALEUROPE responded to targeted consultations in February and July 2025 to inform the upcoming DNA proposal, which will review aspects of the European Electronic Communications Code. The Commission expects to publish its proposal by end 2025. Spectrum topics may also be covered under this issue if applicable.

Digital Simplification Package (AI, Data & Cyber)

This issue will be addressed through joint efforts of the Data Economy and Resilience & Infrastructure PGs, specifically under the AI & Data and the Cybersecurity WG.

The European Commission is preparing a “Digital Omnibus” proposal by the end of 2025 to simplify and align multiple overlapping digital laws, especially on AI, cyber and data. We want this proposal to be an ambitious one so as to meet our 50% target reduction of red tape that is stifling innovation and undermining competitiveness in Europe. DIGITALEUROPE published a thought leadership paper in June with priority simplification recommendations, has participated in several consultations over the summer and is actively engaging with relevant Commissioner Cabinets, MEPs and national ministries to ensure our recommendations are taken up.

European Business Wallet

The eIDAS Regulation, adopted in 2014, aimed at facilitating secure cross-border transactions by establishing a framework for digital identity and authentication in the EU. A revised Regulation amending the original one was adopted in April 2024. The Regulation's main innovation is the introduction of the European digital identity wallet (EU wallet). In May 2025, the Commission announced plans for a proposal of the European Business Wallet, which aims to simplify and digitalise reporting obligations by reducing regulatory burdens. The Commission's proposal is expected by the end of 2025. DIGITALEUROPE published a position with recommendations to feed into the proposal in July 2025.

EU Common Criteria Certification Scheme (EUCC)

The EUCC scheme (Common Criteria based European cybersecurity certification scheme) looks into the certification of ICT products cybersecurity, based on the Common Criteria, the Common Methodology for Information Technology Security Evaluation, and corresponding standards, respectively, ISO/IEC 15408 and ISO/IEC 18045.

EU Cloud Security Certification Scheme (EUCS)

The scheme aims to further improve the Union's internal market conditions for cloud services by enhancing and streamlining the services' cybersecurity guarantees. The draft EUCS candidate scheme intends to harmonise the security of cloud services with EU regulations, international standards, industry best practices, as well as with existing certifications in EU Member States.



EU Cyber Toolbox

The EU Cyber Diplomacy Toolbox, approved in May 2024, provides an updated framework for a unified EU diplomatic response to malicious cyber activities. This guidance builds on existing principles to strengthen the EU's ability to deter, respond to, and hold accountable actors involved in significant cyber incidents. The toolbox promotes coordinated measures among Member States, supports international norms in cyberspace, and fosters partnerships with like-minded allies to enhance global cyber resilience.

Harmonisation of cyber rules

Aims to align global cybersecurity standards, reducing regulatory fragmentation and improving cross-border cooperation. The focus is on coordinating industry and government efforts, with a priority on bridging differences between EU and US rules to foster trust in digital markets and streamline compliance for international trade.

NIS 2 Directive

The NIS2 Directive focuses on the cybersecurity of critical infrastructure and introduces stringent reporting obligations, risk management requirements and potential mandatory certification obligations. The Directive applies from 18 October 2024, but is still not transposed by the majority EU Member States. Divergences between national transposition laws create a fragmented and burdensome compliance regime for entities in scope. DIGITALEUROPE advocates for harmonised and streamlined obligations.

Public Private Partnerships

Von der Leyen has announced the launch of new public-private partnerships to boost innovation in Europe, by creating the right conditions for a real and deep collaboration between private and public parties.

Revision of Cybersecurity Blueprint

The EU cyber blueprint is a guideline for member states to enhance their preparedness, detection capabilities and response to cyber security incidents.

Revision of Public Procurement Directives

Von der Leyen has pledged for a revision of the Public Procurement Directives in her political guidelines for 2024-29. The purpose of this revision will be to ensure the security of supply for certain critical technologies, products and services, while simplifying rules and reducing administrative burden. It should also enable preference for European products in public procurement for certain strategic sectors and technologies. Public procurement accounts for 14% of EU GDP. The Commission is expected to propose a revision of the directives in 2026.

Stakeholder Cybersecurity Certification Group

Through our membership of the SCCG, cybersecurity certification discussions and developments on various technologies and processes. Most notably Cloud Security, IoT, EU Common Criteria.



SINGLE MARKET AND COMPETITIVENESS POLICY GROUP

28th regime for businesses

The Commission is preparing a legislative proposal on a 28th regime for Q1 2026. This voluntary 28th regime would offer companies an alternative to the patchwork of national laws governing corporate form, and potentially also some insolvency, tax and labour rules. The idea for this regime comes from Enrico Letta's vision of a unified European Business Code. It will be especially relevant for tech startups and scaleups operating across the EU Single Market.

Collaboration with European Standardisation Organisations (ESOs)

As partners of CEN-CENELEC and having signed an MOU with ETSI, DIGITALEUROPE has upgraded its status with the three ESOs. This status will provide access to key groups within CEN-CENELEC (Technical Board, policy groups, the presidential committee, advisory and coordination groups, and other bodies) and ETSI (working groups and industry-specific groups). Effective representation will be required across various levels, both technical and policy. The work will expand beyond the European Standardisation Strategy, and encompass also joint events, statements, and position papers. The continuation of collaboration is important given the revision of Regulation 1025, New Legislative Framework and the Market Surveillance Regulation. Under this issue, updates of standardisation activities related to past issues (LVD, EMF, GPSR) will be provided.

Common Charger

The 'common charging' requirements are applied to all handheld mobile phones, tablets, digital cameras, headphones, headsets, portable speakers, handheld videogame consoles, e-readers, earbuds, keyboards, mice, and portable navigation systems since 28 December 2024. These requirements will also apply to laptops as of 28 April 2026.

Critical Raw Materials Act

The European Critical Raw Materials Act identifies strategic projects across the value chain to build strategic reserves where supply is at risk. It pursues supply diversification through Free Trade Agreements and partnerships to advance EU interests, ensuring undistorted trade and investment while developing cooperation with like-minded partners and resource-rich countries. The CRM Act entered force 23 May 2024. Von der Leyen announced an EU Critical Raw Materials Platform in Commissioner mission letters to support joint purchasing and manage strategic stockpiles.

Digital Product Passport

The Digital Product Passport (DPP) will store digital product information, allowing consumers, manufacturers, authorities, and others to access product authenticity, sustainability, and compliance details. Part of the EU's sustainability and circularity strategy, the Commission is defining system architecture for data storage/access and mandatory information across product categories. Our goal is ensuring DPP implementation reflects complex global supply chain realities.



Electromagnetic Compatibility (EMC)

Regulates to ensure electromagnetic interference of devices stays at a minimum. Can only radiate to certain limits & devices need to be immune to certain interference.

European Chips Act 2.0

The European Commission is in the process of reviewing and revising the European Chips Act, with a legislative proposal on semiconductors expected in September 2026. This new law will outline a new EU semiconductor strategy including new support measures for domestic design and manufacturing capabilities, as well as new crisis and resilience requirements. The strategy will be highly relevant for downstream sectors using semiconductors in their products. We also expect the Commission to revise the headline target of achieving 20% of global chip production in Europe by 2030. DIGITALEUROPE is currently developing a position on the Chips Act revision for the Call for Evidence that is ongoing until end of November and to guide further engagement over the coming months.

European Standardisation Strategy

The European Standardisation Strategy outlines the main political and strategic aims of the EU's standardisation framework especially with respect to harmonised standards. This issue covers developments regarding Reg. 1025/2012 which defines the general framework of harmonised standards in the EU.

Horizon Europe

Horizon Europe is the EU's flagship research and innovation programme (2021–2027). For 2028–2034, the Commission plans to nearly double its budget to over €170 billion, with discussions underway in Multiannual Financial Framework negotiations. DIGITALEUROPE will ensure our priorities are reflected in the final programme and that Horizon funding aligns with the European Competitiveness Fund to simplify processes and maximize impact on members' investment priorities. Industrial applied research funding should reach 60% of Horizon from the Commission's proposed 43%.

Investment & Incentives (incl. EIB, TechEU, Scaleup Fund)

In line with our cut–simplify–incentivise agenda, DIGITALEUROPE is working to make investment in Europe's digital sector more attractive and accessible. We are engaging closely with the European Investment Bank (EIB) to define priorities for digital investment and accelerate the disbursement of financing. Following our roundtable with the EIB President, the Bank launched the TechEU fund in July 2025, improving visibility and access to financing in line with our recommendations. Looking ahead, we are preparing a paper with concrete proposals to unlock private investment, incentivise innovation and boost competitiveness. At the same time, we are shaping the implementation of other financial instruments (e.g., under the European Innovation Council) and pushing for an ambitious new Scaleup Fund to secure Europe's tech leadership.



Multi-annual Financial Framework negotiations (incl. European Competitiveness Fund)

Negotiations on the EU's next long-term budget (2028–2034) are underway, with the Commission proposing just under €2 trillion. A central element is the new European Competitiveness Fund, worth over €400 billion, including more than €50 billion to strengthen Europe's digital leadership. DIGITALEUROPE is working to ensure that this fund is ambitious and that significant resources are targeted to our priorities across sectors by ringfencing 25% of the budget to digital, securing the investment Europe needs to stay competitive. We are also focused on the revenue side of the budget, making sure proposals do not increase costs for our members and that they support – rather than undermine – Europe's competitiveness goals.

New Legislative Framework (NLF)

The EU New Legislative Framework (NLF) is a set of horizontal guidelines ensuring product safety and compliance across the EU, establishing uniform regulations for market surveillance and CE marking for products. Recent work encompasses input to (1) the NLF revision (2) the Omnibus IV simplification package (aligning product legislation with the digital age) and (3) the upcoming revision of the Market Surveillance Regulation.

Quantum Act

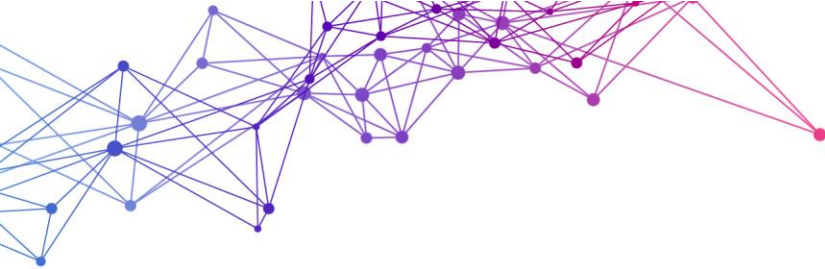
The European Commission sees quantum as a sensitive and strategic technology. It has published a Quantum Strategy in June 2025 and announced plans for a legislative "Quantum Act" in H1 2026 to regulate the emerging quantum ecosystem. This poses significant risks for the nascent sector, but also opportunities in terms of additional funding and political support.

Radio Equipment Directive (RED)

The RED Directive establishes a regulatory framework for placing radio equipment on the EU market. It aims to support a single market for radio equipment by setting essential requirements for safety and health, electromagnetic compatibility, and the efficient use of the radio spectrum. We engage with the Expert Group that advises on the implementation of RED with the purpose of shaping implementation and improving the interplay between RED and relevant provisions in other legislation such as the AI Act.

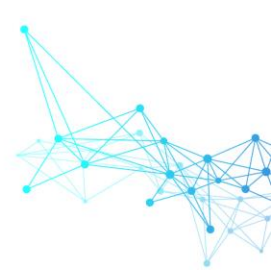
Strengthening the Single Market (barriers reduction)

A seamless Single Market is essential for Europe's competitiveness. Companies can only grow if they can scale across borders, which means breaking down barriers and cutting red tape. DIGITALEUROPE is working closely with the European Commission and partner trade associations to implement the new Single Market Strategy, deliver concrete burden reduction, and organise joint statements and high-level engagement in Brussels. This work also focuses on shaping the forthcoming Single Market Barrier Reduction Act and influencing the Single Market Roadmap to 2028, announced by President von der Leyen in September 2025.



Union of Skills: Tech Talent and Digital Education

The Commission's Union of Skills initiative highlights the need to address Europe's talent shortages and strengthen digital education systems. DIGITALEUROPE has been actively shaping this debate, emphasising three key priorities: ensuring a strong pipeline of AI and emerging technology skills, embedding trust and quality in the roll-out of digital technologies in the classrooms, and scaling up micro-credentials and flexible learning pathways to meet rapidly changing labour market needs. This work links directly to DIGITALEUROPE's broader agenda on competitiveness, ensuring Europe can both deploy and govern frontier technologies responsibly.





SUSTAINABILITY POLICY GROUP

Sustainability Omnibus (CSRD, ESRS, CS3D & Taxonomy)

The Sustainability Omnibus proposal (February 2025) simplifies corporate sustainability requirements by amending the CSRD, CS3D, and EU Taxonomy Regulation. It reduces administrative burdens and improves legal certainty while maintaining high standards and balancing sustainability with competitiveness. The "Stop-the-Clock" provision delaying CSRD and CSDDD application entered into force in April 2025, requiring Member State transposition by December 31, 2025. Substantive changes remain under review, with trilogue discussions in Q4 2025-early 2026. Once the Omnibus is adopted, the Commission will work on implementation guidelines.

Batteries Regulation (sustainability, safety & due diligence)

The EU Batteries Regulation, adopted in July 2023, sets mandatory requirements on sustainability, labelling, removability and due diligence. The Commission is preparing secondary legislation, with recent work focused on draft rules and guidance for waste, removability, labelling and due diligence. DIGITALEUROPE is actively contributing to ensure proportionate and harmonised implementation, supporting digital industries in meeting ambitious circularity goals while avoiding fragmentation and excessive compliance burdens.

Circular Economy Act

The upcoming Circular Economy Act (CE Act) will establish a practical framework advancing Europe's competitive circular economy. It will address digital sector priorities: enabling an EU Single Market for secondary raw materials, improving recycling quality, revising WEEE targets, and streamlining regulations supporting circular business models and R-strategies (repair, reuse, refurbishment, remanufacturing). DIGITALEUROPE is currently preparing a response to a public consultation which will close in November 2025. The Commission's proposal is expected to be published in Q4 2026.

Ecodesign for Sustainable Products Regulation (ESPR) Horizontal Framework

In June 2024, the EU adopted the Ecodesign Regulation (ESPR) to make products fit for a circular economy. The European Commission is currently developing implementing and delegated acts to roll-out the ESPR. Work under this issue specifically encompasses: (i) horizontal delegated acts on reparability (2027) and recyclability/recycled content (2029), (ii) implementing act on unsold consumer goods, (iii) implementing act on 'ESPR label', (iv) preliminary studies aimed at establishing methodologies on substances of concern' management and recycled content/CRMs presence in electronic products, (v) revision/updating of energy labelling requirements/EPREL information requirements, via the Energy Labelling framework.

EU Deforestation Regulation

The EU Deforestation Regulation (EUDR), mandates that certain commodities (e.g. palm oil, cattle, coffee, cocoa, soy, wood, rubber) and derived products entering or leaving the EU must be free of deforestation, backed by robust due diligence and traceability requirements. It came into force in June 2023, but its application has been postponed until 30 December 2025 for large/medium operators and 30 June 2026 for micro/small enterprises. The Commission is considering an additional 1-year delay.



EU Persistent Organic Pollutants Regulation

The EU POPs Regulation bans or restricts persistent organic pollutants (POPs) from being produced or used within the EU market. It implements the international Stockholm Convention at the EU level and is updated regularly based on new substances being included in the Stockholm Convention. Companies required to comply with the EU POPs Regulation include manufacturers, importers, and sellers of chemicals or articles (incl. electronics) that either contain or release POPs. The Regulation also prescribes limits for unintentional trace contaminants (UTC) of POPs substances.

Environmental omnibus

In the Single Market Strategy published in May 2025 the Commission announced an environmental omnibus aimed at simplifying regulations and reducing the administrative burden on businesses, particularly regarding Extended Producer Responsibility (EPR) obligations, SCIP database under the Waste Framework Directive, further digitalisation and permitting challenges as recently assessed under the Net Zero Industry Act. The Commission's proposal is expected to be published by end 2025.

Forced Labour Regulation

The Regulation banning forced labour products from the EU market was published December 2024, applying to all manufactured and imported products with broad compliance requirements. Commission guidelines expected in 2026 will clarify due diligence expectations, remediation, and best practices. DIGITALEUROPE advocates for proportionate alignment with related due diligence legislation (e.g., CS3D) to minimize duplicative obligations for companies under existing frameworks.

Green Claims Directive

On 22 March 2023, the European Commission proposed a directive on green claims requiring companies to substantiate voluntary green claims in business-to-consumer practices through lifecycle assessments and third-party verification. The proposal sets communication requirements and environmental labelling rules. Trilogue negotiations began January 2025, but the Commission indicated withdrawal intentions in June, making adoption uncertain.

Lot 3 (Computers and computer servers)

The European Commission is reviewing the Regulation for Computers (notebooks, desktops, workstations, servers), with a proposal expected for adoption by end 2026, as per deadline set by the Ecodesign Directive. Following the stakeholder meeting of 15 September 2025, DIGITALEUROPE is now working to provide feedback on the draft regulation. The next legislative milestone is the publication of the impact assessment, expected by summer 2026.

Lot 4 (printers)

The European Commission is in the process of developing a Regulation for Imaging Equipment. A proposal is expected in 2025.



Lot 5 (electronic displays)

The European Commission is in the process of reviewing the Regulation for Electronic Displays, which is expected to be adopted in 2027.

Lot 6/26 (Standby, networked standby, and off mode)

The European Commission is considering adopting a FAQ to support implementation of the Regulation for 'off', 'networked-stand-by' and 'stand-by mode' features for electronic products. No timeline was provided for this work. The Regulation started applying in May 2025.

Lot 7 (external power supplies)

The European Commission is in the process of reviewing the Regulation for External Power Supplies, which is expected to be published in the OJ in mid-end 2025.

Lot 9 (servers and data storage products)

The European Commission is in the process of reviewing the Regulation for Servers and Data storage products, which is expected to be adopted by the end of 2026.

Packaging and Packaging Waste Regulation

In April 2024, co-legislators agreed on a Packaging and Packaging Waste Regulation, repealing the previous directive. The corrigendum was adopted by Parliament and Council, with Official Journal publication expected in February. Guidelines and secondary legislation are needed for timely implementation. The regulation mandates all EU packaging be recyclable by 2030, requiring companies to adapt design and materials to increase recycling.

REACH restrictions & PFAS

REACH restrictions limit, ban, or set conditions on substance manufacture, placement, or use. In January 2023, five countries submitted a restriction proposal to ECHA for all PFAS ('forever chemicals'), potentially effective by 2028 with no initial electronics exemptions. Scientific assessment continues in 2026, with second consultation in H1 and ECHA opinions finalized in H2. The Commission will then decide PFAS regulation, addressing its consumer ban pledge and evaluating industrial derogations.

REACH revision & chemicals industry package

The European Commission will publish in Q4 2025 a Chemicals Industry Package, including a proposal for the revision of the REACH framework. Specifically, the package aims to simplify the REACH Regulation and to provide clarity on the regulation of PFAS in the EU. Focus of the revision will be to modernise REACH, reform the restriction and authorisation processes, extend the generic approach to risk assessment for faster regulatory action, digitalise and extend information requirements (incl. making use of DPP) and more.



RoHS revision and exemptions

RoHS ('Restriction of Hazardous Substances in Electrical and Electronic Equipment') exemptions temporarily allow restricted substance use in certain applications. In November 2022, the Commission shelved the full RoHS 2 Directive review. A December 2023 report evaluated that RoHS fulfills its objectives. Under 'One substance one assessment,' the Commission proposed transferring RoHS technical tasks to ECHA, adopted Summer 2025. The Commission is currently working on exemptions in Packs 22, 23, 27, and more.

Waste Shipments Regulation

Waste Shipment Regulation applies from May 2026 and aims to reduce shipments of problematic waste both intra and extra EU, update shipment procedures to reflect the objectives of the circular economy and climate neutrality, to make use of digital submission and exchange of information, and to improve enforcement and tackle illegal shipments. A delegated act (2024/3230) mandates PIC for intra-EU shipments of non-hazardous e-waste from 2027. DIGITALEUROPE is responding to the ongoing consultation on green-listing, advocating to maintain simplified procedures and minimise disruption to circular business models via a streamlined, harmonised approach.

WEEE Directive

The Commission will review the WEEE Directive by end-2026, aligned with the CE Act. A comprehensive revision converting the Directive into a Regulation will address low collection rates, lack of harmonization, and inefficiencies. Key areas include Extended Producer Responsibility (EPR), calculation methods, ecomodulation, and reporting obligations to achieve circular economy goals and improve Single Market functioning. DIGITALEUROPE engages stakeholders through publications and consultations to shape an effective, balanced framework.