

Annotated agenda – Nordic-Baltic coordination network on regulatory issues (NoBaReg)

23. - 24. June 2026, (10:30 – 17:00, 09:00 – 15:30)

Venue: Thon Hotel Brussels City Centre

Participants:

Denmark	Latvia	Aaland Island
Estonia	Lithuania	Ukraine
Finland	Norway	
Iceland	Sweden	

This annotated agenda combines agenda descriptions, presentations, and brief summaries of discussions and agreed next steps and is intended as both meeting documentation and a reference for future NoBaReg work.

Tuesday 23. June 2026	
Topic	Annotation
Digital Fitness Check	The Digital Fitness Check (DFC) is the second stage of the Commission's plan to simplify the EU's digital rules, following the adjustments made under the Digital Omnibus. It will analyse the interplay between the EU's digital rules, their cumulative impact on businesses, and how effectively they support the EU's competitiveness, values and fundamental rights. The upcoming work on the DFC raises several questions, and NoBaReg wanted to share how their different countries engages/plan to engage with it. There was a scope for discussion on converging approaches or positions. The session was scheduled as a dialogue based on the European Commission's goals, and what NoBaReg Member States have found challenging, sharing experiences and other topical issues related to the Fitness Check, to give DG CONNECT insight for their ongoing work. NoBaReg will follow up with DG CONNECT on future initiatives and keep the dialogue open. Representatives from DG CONNECT: Diana Vlad-Câlcic and Olivier Fajgenblat
EU Law Explorer	Based on a note prepared by the DK-team mapping out a way forward for the EU Law Explorer PoC, the group approved the suggested ways forward: Following successful review, NoBaReg will proceed to MVP development, prioritizing a solid data model and simple interface over a full feature set, moving from RDF files to a

	triple store, replacing web scraping with API-based data ingestion (CELLAR etc.), and adding a manual data-entry GUI for forums and authorities. Roadmap: Tender process May–June, contract from end June, development August–October, work product approved mid-October, all 2026.
Cloud and AI Development Act	Ms. Leire ORUE-ECHEVARRIA from DG CNECT gave a presentation, that is summed up as follows: 1. Context: The Tech Sovereignty Package CADA sits within a broader Tech Sovereignty Package launched under a Chapeau Communication on European Tech Sovereignty, alongside a Chips Act 2.0, a roadmap for digitalisation and AI in the energy sector, and an EU Open Digital Ecosystems ("open source") strategy. 2. The concept of technological sovereignty Defined as Europe's ability to develop, control, and scale the critical technologies, infrastructure, services and data underpinning its economy, security and society — while de-risking supply chains and reducing strategic dependencies. Three stated objectives: winning the "battle of adoption" (driving EU uptake of new tech/AI), reinforcing supply-chain resilience while staying open to like-minded partners, and promoting a distinctly European approach to tech sovereignty. 3. Problem statement Two core problems frame CADA: Limited, geographically concentrated compute capacity in the EU — constrained by complex/fragmented permitting, energy access, slow site identification, and limited capital access. Dependence on non-EU cloud/AI providers — raising concerns over operational autonomy (service continuity), technology access/innovation, and confidentiality (unlawful data access). 4. The data behind the problem Data center capacity vs. demand: forecast demand is projected to significantly outpace both status-quo and CADA-boosted supply through 2036, with the "supply gap" widening over time even under CADA. Capacity distribution: highly uneven across EU27 (measured in MW per 100,000 people) — Ireland is a major outlier (~30), followed by the Netherlands, Denmark, Finland and Sweden; most member states sit well below the EU average, with Hungary, Bulgaria and Lithuania lowest. Market dominance: roughly 80% of EU cloud market revenue goes to US providers, ~15% to all EU providers combined, with the largest individual EU provider holding only ~2% share. Dominance is most pronounced in IaaS, where AWS (56%), Microsoft Azure (19%) and Google Cloud (10%) together hold ~85% of the EU-27 market (Q1 2025, Statista).

5. CADA's scope — three pillars

CADA is structured around R&D&I, Capacity, and Autonomy:

- **Pillar 1 (R&D&I):** Cloud and AI Leadership Initiatives, delivered through "Grand Challenges," to drive research, innovation and deployment of next-generation technologies.
- **Pillar 2 (Capacity):** Data centre acceleration zones — streamlined permitting and predictability to facilitate sustainable data centre deployment across the EU.
- **Pillar 3 (Autonomy):** A single EU-wide assessment and procurement framework for cloud/AI sovereignty, EU-value-added award criteria, joint procurement, MS infrastructure federation, and greater use of open source.

6. Pillar 1 — R&D&I: objectives and implementation

General objectives: supporting cutting-edge cloud/AI development and deployment, reinforcing EU data centre/cloud capacity, and stimulating public- and private-sector uptake.

Operational objectives (9 areas): advanced data centre technologies, cloud and AI stack, frontier AI, physical AI, industrial AI, platforms for AI agents, AI systems/models, and adoption across sectors.

Implementation: delivered via Grand Challenges and Experience & Acceleration Centres for AI (building on EDIHs); implemented by the Commission, Member States (including EDICs) and Joint Undertakings; funded through Union programmes, ERDF and RRF, with synergies expected with Chips Act 2 and open-source strategies. National Cloud and AI Strategies are expected to support CADA implementation, linking to Apply AI and the Digital Decade. EDICs pioneering Frontier AI should get sufficient compute, with the EU matching MS-provided resources.

7. Pillar 2 — Capacity

Data Centre Acceleration Zones (DCAZ): Member States must designate at least one, based on assessment of site location/size, grid capacity and clean-energy options, network connectivity, legacy copper phase-out, waste-heat reuse, permitting acceleration, brownfield preference, and environmental sustainability. MS must provide a single information point for investors and an aggregated baseline permit and ensure fair allocation between operators.

Strategic data centre projects: Commission-designated via open calls, requiring at least two of: grid-stability contribution, support for essential public functions, sustainability/innovation features, EU-produced technology, or addressing major compute shortages. Benefits include access to Union programme support and a Competitiveness Seal under the European Competitiveness Fund.

Monitoring: ongoing tracking of the capacity gap — available compute (including edge) versus demand — to identify underserved areas.

8. Pillar 3 — Autonomy: Sovereignty framework

CADA establishes a four-level cloud/AI sovereignty assurance framework.

Third-country recognition: the Commission may recognise a third country as offering sufficient sovereignty guarantees (enabling Level 3 audits) based on six criteria — GDPR

	adequacy, no conflicting measures on lawful access to non-personal data, no service-disruption or sanctions-related measures, no barriers to state-of-the-art tech, an open market for EU cloud services, and reciprocal EU access to that country's public procurement. Service recognition: Level 1 is self-assessed conformity (with an SME exception); Levels 2–4 require independent third-party audits. Competent authorities have investigative powers with mutual MS/Commission assistance, and recognised services are listed in a public central repository. Public procurement: MS must conduct national sovereignty risk assessments determining which public-sector use cases require which assurance level; the Commission will issue implementing acts for methodological convergence across MS. Public bodies may only use Level 1–4-awarded services. NIS2 Annex 1 private-sector essential entities may also apply these criteria voluntarily, with the Commission able to mandate this via delegated acts for specific sectors. 9. Pillar 3 — Autonomy: Resilience measures EU Added Value criteria: where non-price criteria apply in procurement, contracting authorities must apply (non-decisive) EU Added Value criteria rewarding EU supply-chain reinforcement, use of EU-funded technologies, EU-based innovation, and EU hardware integration. Innovation procurement target: MS must monitor/report annually on innovative cloud/AI procurement, with a target of 25% awarded to innovative SMEs. EuroCloud Federation: a voluntary public-sector cloud federation letting Union entities and public bodies share data centre/cloud capacity, subject to owning/controlling the underlying hardware, ensuring secure/resilient service, and charging only cost-based fees; the Commission is tasked with setting up the exchange platform. Joint procurement: the Commission may conduct EU-level cloud/AI procurement on behalf of EU institutions/agencies, MS authorities and partner organisations, including both joint procurement and central purchasing. Open source: MS must promote open-source software in public procurement and publish released software in an EU OSS Catalogue (established by CADA); the Commission will set up an OSPO Network.
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Wednesday 24. June 2026	
Topic	Annotation
Digital Sovereignty Framework	The session was based on presentations the EC shared with NoBaReg Content/background The Tech Sovereignty Package — launched via a Chapeau Communication on European Tech Sovereignty — comprises the Cloud and AI Development Act (CADA), a Chips Act 2.0, a roadmap for digitalisation and AI in the energy sector, and an EU Open Digital Ecosystems (open source) strategy. Technological sovereignty is defined as Europe's

	ability to develop, control and scale the critical technologies, infrastructure, services and data underpinning its economy, security and society, while reducing strategic dependencies. Both CADA and Chips Act 2.0 follow a similar three-pillar structure: ecosystem/technology, infrastructure/strategic projects, and security of supply. (CADA's own three pillars and four-level sovereignty assurance framework were covered under the separate CADA agenda item.) Chips Act 2.0 builds on the original Chips Act (in force since September 2023, structured around R&D&I, security of supply, and supply chain monitoring/crisis response via the European Semiconductor Board; 85% of R&D&I funding committed, €80 billion committed in manufacturing investment). The 2.0 version takes stock of the changed geopolitical and technological context, retaining the three-pillar structure while adding criteria for recognising first-of-a-kind semiconductor technology initiatives and strategic projects. EU Open Source Strategy operates on supply-side measures (developing, maintaining and securing high-quality open source components; scaling up the open source business ecosystem) and demand-side measures (accelerating adoption across public administration, companies and industry), organised around four aims: a vibrant open source ecosystem, technological sovereignty, open/interoperable public administration systems, and strengthened digital standards and international leadership. Funding approach: the Commission is exploring a new approach to R&D/project funding and tech public procurement, with a particular focus on equity financing — flagging a significant gap in equity and high-risk financing, and consultation with Member States, the EIB Group and stakeholders on establishing a European equity facility at scale. DIGIT sovereignty framework (procurement application): separately, DIGIT has developed a sovereignty framework for EU procurement of sovereign IaaS/PaaS cloud services — replacing the expiring Cloud II DPS1/MC5 (OVH) contract (expiring December 2026) and addressing growing demand for sovereign solutions (€180M contract value cited). Technical focus includes a "sovereign region" architecture (three high-availability zones in the EU, no international data transfers or dependency on remote services) and a streamlined PaaS/GitOps developer experience. Evaluation criteria weight sovereignty and quality at 70% combined (with quality itself weighted toward sovereignty, security and technical factors) against 30% price. At the centre of the framework sits a sovereignty scoring system: 8 objectives (strategic, legal/jurisdictional, data & AI, operational, supply chain, technology, security/compliance, and environmental sustainability sovereignty), each scored individually, combining into a level of assurance ("SEAL," 0–4) and a sovereignty percentage ranking. The global SEAL rating is the minimum of all individual answers — a single weak area caps the overall score. Requirements become progressively stricter from SEAL 2 to SEAL 4 (e.g., moving from documented/local operations toward exclusively EU-based decision-making, EU-certified components, and full open-source/public-standard compliance). Five cloud service provider typologies were
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	identified (from "EU Full Stack" providers to standard global hyperscaler offerings), with no clear correspondence found between provider typology and SEAL rating. Four qualified offers were evaluated under this framework, receiving SEAL-2 to SEAL-3+ ratings (providers referenced: Proximus, Scaleway, S3NS/Thales-Google Cloud, POST Telecom, STACKIT/inovex, Clever Cloud).
Data Union Strategy, Digital Omnibus and their impact on the Open Data Directive and High Value Datasets	Jiri Pilar from DG CNECT gave a presentation, that is summed up as follows: 1. Overview: Two converging initiatives The presentation frames two parallel processes that overlap in one key area: the Data Union Strategy and the Digital Omnibus (Digital Simplification Package), both launched around November 2025, with "simplification of the data acquis" as their shared ground. 2. Data Union Strategy — three pillars addressing three problems Framed around three immediate problems: data scarcity as a bottleneck for AI training, regulatory complexity hampering scale, and global competition over data as a strategic asset. Pillar 1 – Scale up access to high-quality data for AI and innovation: flagship actions include Data Labs (from Q4 2025), a Cloud and AI Development Act (Q2–Q3 2026), continued funding for Common European Data Spaces (+€100M from 2026), and improved accessibility of high-value datasets in science, culture and languages (from 2026). Pillar 2 – Simplify the data regulatory landscape: uses the Digital Omnibus as its legislative vehicle; also includes support for companies implementing the Data Act (published: model contractual terms, cloud-switching clauses, vehicle-data guidance, FAQs; upcoming in 2026: guidelines on reasonable compensation for B2B data sharing and on selected Data Act definitions). Pillar 3 – "Open but assertive" approach to international data flows: ensuring fair treatment of EU data abroad (guidelines, an "anti-data-leakage toolbox," protection of sensitive non-personal data); linking EU data ecosystems with like-minded third countries (promoting EU data solutions such as the Trusted Data Framework and Simpl, exploring a "Trust Label"); and boosting the EU's voice in global data governance (G7, G20, OECD, UN). 3. Digital Omnibus — political context and scope Positioned within the 2024–2029 Commission mandate's simplification agenda; October 2025 Council Conclusions explicitly called for further ambitious digital simplification packages. It is the seventh such simplification package, with an estimated €5 billion in administrative cost savings for businesses expected by 2029. Scope covers: amendments to the AI Act, consolidation of the "data acquis," cybersecurity incident-reporting rules, and repeal of the P2B Regulation. 4. Consolidating the data rulebook The core simplification idea: merge overlapping instruments — the Data Act, Data Governance Act, Free Flow of Non-Personal Data Regulation, and Open Data Directive — into a single, streamlined framework for re-use of public sector data, while keeping

separate rules where necessary and not touching national access regimes. Stated stakeholder feedback: over 60% support for consolidation in the Data Union Strategy public consultation.

5. Governance change: PSI Group folded into EDIB

The Digital Omnibus proposal would fold the Public Sector Information (PSI) Group into the European Data Innovation Board (EDIB), which would take on a broadened advisory and coordination role across data policy, governance, international data flows, and cross-sectoral developments (draft Articles 41a and 42 shown).

6. Looking ahead: Digital Fitness Check

A forthcoming exercise analyzing the digital rulebook's coherence and cumulative effects; kick-off work is mapping impacts and scoping the analysis; the related public consultation closed in March 2026; adoption is planned for Q1 2027.

7. Common European Data Spaces

Explained as secure, peer-to-peer environments combining technical infrastructure with a governance framework for data sharing, where data holders retain control over access and usage terms. A roll-out timeline (2023–2027) was shown covering spaces for cultural heritage, genome, cancer images, language (ALT-EDIC), mobility, media, manufacturing, smart communities, public procurement, tourism, skills, Green Deal, energy, and agriculture.

8. Data Labs as the "data frontend" of AI factories

Data Labs are positioned as intermediaries feeding Common European Data Spaces and other data sources into AI Factories (data storage and HPC-as-a-service), with functions scaling to available budget: collecting data on demand, building data pools, ensuring regulatory clearance, and ensuring data quality.

9. High-value datasets (HVDs)

Country-level HVD counts were shown (e.g., Germany 10,137; Ireland 2,027; Spain 1,173 down to Norway 5), with a 45% increase in HVDs since March 2025.

Updated HVD documentation for data providers, ongoing quality assessment/annotation, and support to member states via the European Data Portal (EDP).

data.europa.eu stats: EDP currently harvests HVDs from 22 countries, with a breakdown by category (earth observation/environment being by far the largest) and member state shown.

A beta HVD dashboard was introduced (data.europa.eu/en/hvd-dashboard), offering visual navigation by category, country, metadata quality, format, and catalogue.

February 2027 reporting will build on existing/improved common practices: metadata standards (DCAT-AP HVD), shared code lists, and the data.europa.eu harvesting network.

10. Extension of thematic HVD categories

An initial study (published 2023) identified candidate new categories: climate loss, energy, financial, government/public administration, health, justice/legal, and

	language. A new impact assessment study will be launched soon, and the Data Union Strategy proposes adding legal, judicial, administrative, and other data.
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