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EU Ecodesign for Sustainable Products Regulation Proposal (ESPR)

Bitkom Position Paper, 22 June 2022

At a glance

EU Ecodesign for Sustainable Products Regulation Proposal (ESPR)

What is this about?

On 30 March 2022, the European Commission published the proposal for a new Ecodesign for Sustainable Products Regulation. The proposal builds on the existing Ecodesign Directive, which currently only covers energy-related products and establishes a framework to set ecodesign requirements for specific product groups to improve their circularity, energy performance and other environmental sustainability aspects.

Bitkom's view

Bitkom welcomes the European Commission's intention to work towards products that are as sustainable, environmentally conscious, and circular as possible. With the revision of the existing Ecodesign Directive, the European Commission is taking an important step towards a sustainable and climate-neutral Europe/EU.

Core points

To strengthen the objective of the Regulation while ensuring its practical feasibility, we provide some comments on its elaboration. Our key points are:

- **Strengthen the internal market, avoid market fragmentation: Implement a horizontal EU ecodesign framework with a sector-/product-specific approach.**

  We welcome the proposal for a regulation based on the existing and effective ecodesign framework. A sector- or product group-specific approach is important in both the framework and delegated acts, setting clear standardisation requirements.

- **Harmonisation of ecodesign requirements: Ensure complementarity of the ESPR and focus on significant environmental impacts.**

  We welcome the adoption of harmonised ecodesign requirements at the EU level. However, it is important to respect its complementarity with other legal acts and to focus product group-specific requirements on key environmental impacts, based on a holistic life cycle assessment.

- **Lay the foundation for a sustainable and climate-neutral economy and society: Shape the Digital Product Passport (DPP) to be dynamic, verifiable, and enforceable.**

  Bitkom advocates a DPP at model or batch level. The information requirements for the DPP should be limited to what is important to key stakeholders over the lifetime of a product and rely on existing databases at first. Access rights to the DPP should be differentiated for various categories of data-user and determined on a need-to-know basis.

Content

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General Remarks

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Bitkom welcomes the European Commission's intention to work towards products that are as sustainable, environmentally conscious, and circular as possible. With the revision of the existing Ecodesign Directive, the European Commission is taking an important step towards a sustainable and climate-neutral Europe/EU.

We welcome the change to a regulation as we see it as strengthening the internal market and avoiding market fragmentation. Horizontal EU rules are preferable to national initiatives such as the French Circular Economy law and Repairability Index. Existing and effective regulations under the current ecodesign framework should be maintained and protected from legislative interference.

Bitkom and its members support a sector-/product-specific approach, creating vertical product group specific requirements, in both the framework and the delegated acts. We support that the ESPR builds on the successfully established process of the Ecodesign Directive and provides for a phased in working plan, a preparatory study phase, Ecodesign Forum, and Impact Assessment to ensure a comprehensive and efficient product. The European Commission should ensure the inclusion of feedback from all stakeholders throughout the process and take account of concerns of affected industries. For Bitkom and its members, clear and separate product-specific standardisation requirements by the European Commission are essential.

Harmonised standards and the principle of presumption of conformity should form the basis for the declaration of conformity in the ESPR and related implementing/delegated acts. These standards should be actionable, specific, measurable, enforceable, relevant, and pro-competitive.

Bitkom supports a regulatory approach that balances environmental impacts, typically focused on CO_2 impacts, with circularity benefits. We welcome the use of a science based approach that clearly defines the negative impacts versus benefits using tools such as life cycle assessment (LCA) and circularity assessments per product category and

standardised methods to validate relevance for the regulation of eligible parameters (e.g. reliability, durability, repairability, recyclability, recycled content etc.). Performing a LCA or circularity assessment on each individual product should be avoided as it creates unnecessary economic and administrative burden.

Sustainability requirements cannot be at the expense of product safety, which could be impacted by the use of non-compatible parts or improper modifications. Safety legislation acknowledges the possibility that modifications made outside of the manufacturer's control may affect conformity with existing laws. In such cases, the person making such modifications effectively becomes the 'manufacturer' and should assume all responsibilities for the safety and related guarantees of the product. The ESPR should include wording to ensure that those who undertake a repair of an electrical product, whether in a commercial or personal capacity, are fully aware of the subsequent consequences and their legal obligations. We recommend that reliability requirements should not be applied immediately to a wide range of products but should be applied to a limited number of product categories as pilot cases.

Bitkom advocates a dynamic, verifiable, and enforceable Digital Product Passport (DPP) that relies on existing databases such as the database for information on Substances of Concern in articles as such or in complex objects (Products) (SCIP) and the European Product Registry for Energy Labelling (EPREL) to avoid unnecessary and costly replications. The information requirements for the DPP should be limited to what is important to key stakeholders over the lifetime of a product. The implementation of the DPP needs to be accompanied by appropriate safeguards protecting confidential and sensitive business information and should be relevant to the product model number and consistent with the EU's well-established New Legislative Framework template for Union harmonisation legislation for products which requires declaration of conformity at the level of the product model.

Subject matter & scope

Bitkom supports the ESPR objectives to reduce the negative life cycle environmental impacts of products placed on the European market and believes that strengthening and expanding ecodesign requirements can be a successful tool to meet such objectives. However, the inclusion of restrictions of chemical substances as possibly in scope of secondary legislation is disproportionate for the objective of this framework and should therefore be excluded. Any chemical restriction should follow the robust and science-based restriction assessment as established by REACH; the secondary legislation adoption process that will follow the ESPR is not suited for the scientific assessment needed for chemicals restriction.

Definitions

Any definitions made under the Regulation must ensure that they are in line with internationally accepted definitions. We ask the European Commission to undertake

and ensure alignment with international standards and existing legislation. Coherence between the Ecodesign Directive, the Blue Guide and the ESPR must be ensured.

Not conclusively, we point out the following cases of doubt within the definitions made, which should in any case be cleared up in the text:

- The definition given for “intermediate products” (Art 2 (3)) causes legal uncertainty, as this cannot sufficiently include changes to the product during the production process. EU product law should continue to apply primarily to completed products only.
- The definition given for “environmental footprint” (Art 2 (23)) suggests that the PEF method should be the preferred assessment method for every product. We see the added value of the PEF method for some, but not all products. Product carbon and environmental footprints should achieve regulatory objectives, but not limit manufacturers to the PEF methodology. The PEF methodology still requires further development in the form of Product Environmental Footprint Category Rules (PEFCRs), without which, its applicability and comparability would be limited. Allowing international recognized LCA standards and third-party reviewed industry benchmarks with emphasis on primary data must be seriously considered.
- The definition given for “substance of concern” (Art 2 (28)) is considered confusing and too broad as it considers both substances that have environmental or health impacts and substances that can affect re-use and recycling of materials. Basically, every substance could potentially fall under the definition. The term “substance of concern” should be referred only to SVHCs.
- The definition given for “destruction” (Art 2 (35)) can be interpreted as exempting manufacturers of electrical and electronic equipment, subject to the WEEE Directive, from the requirements under Article 20. Manufacturers of electrical and electronic equipment are required to dispose of waste equipment via Producer Responsibility Organisations (PROs) under national implementation of the Directive, in order to ensure the proper treatment of waste electrical and electronic equipment. As such manufacturers of waste electrical and electronic equipment are required to deliver unsold electrical and electronic equipment to a PRO, which is an organisation to which a product is delivered for treatment in line with the Waste Framework Directive’s waste hierarchy, therefore including re-use and remanufacturing.
- The definition given for “unsold consumer products” (Art 2 (36)) includes products which have been returned by a consumer, that seems to be in contradiction with the common understanding of “unsold”.

Safeguarding of already existing legislation

The European Commission’s proposal includes safeguards for the already existing product-specific implementing measures and aims to have these recognised as product-specific delegated acts within the meaning of the new framework regulation. While it is certainly necessary and welcome that the European Commission suggests a safeguard clause, it remains unclear how this will work in practise given that the new proposal

includes a few more aspects that need to be taken into account for setting up ecodesign requirements.

Bitkom supports consistency between the requirements of the proposal for a Regulation for Ecodesign for Sustainable Products (ESPR) with other horizontal legislation such as the Regulation (EU) 2019/1021 on persistent organic pollutants (POPs Regulation), Regulation (EC) 1907/2006 on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS), Directive 2012/19/EU on waste electrical and electronic equipment (WEEE), Directive 94/62/EC on packaging and packaging waste, and the Directive 2008/98/EC on waste. Ongoing revision processes should be duly considered as well.

In any case, the distinction between the Ecodesign Regulation respectively the delegated acts and the relevant product-specific special regulations needs to be clarified.

Ecodesign requirements

Bitkom welcomes the harmonization of ecodesign requirements for the broad range of products at EU level, thus preventing fragmentation and ensuring legal certainty for manufacturers and other economic actors. Nonetheless, we encourage the Commission, when setting ecodesign requirements for specific product groups, to uphold the complementary role of the ESPR and set ecodesign requirements on aspects covered by other legislation only when justified by a detailed assessment and after consulting with stakeholders. For each selected product or product group, the ecodesign requirements should focus on those criteria where the environmental impacts are most relevant, following a holistic LCA.

However, different products can often be inadequately compared only on the basis of their different environmental impacts. Even identical products are only approximately comparable if the same methodology and comparable accounting limits as well as comparable functional units are observed. Within the area of environmental life cycle assessment, there are very controversial discussions about when products are comparable.

Moreover, it is not easy to codify the environmental impacts in the use phase of products, since, among other things, individual user behaviour has a major influence on the overall sustainability of a product during its life cycle.

Durability

Durability extends the concept of reliability to what the end-user really experiences. It includes information on maintenance and repair. Including information on maintenance and repair makes durability more complex to measure. Therefore, we call for product specific standards for durability that are developed based on the available horizontal standard EN 45552. We encourage the European Commission to issue a

standardisation request to that respect. We generally favour the use of the concept of durability to communicate relevant product information towards the end-user. To that end, we support the introduction of a durability index – albeit for a limited number of product categories in the beginning – combining reliability and reparability criteria as well as elements which contribute to the prolongation of the lifetime. The approach of stimulating durability should be market driven, considering the environmental/climate impact over the lifetime.

Reliability

Reliability as a parameter is closely linked with durability, but the two are not the same. Regular maintenance is what keeps appliances run reliably. The EN 45552 defines reliability as the "probability that a product functions as required under given conditions, including maintenance, for a given duration without limiting event". A limiting event is an incident that results in a primary or secondary function no longer being performed. The definition in EN 45552 guarantees measurability of reliability and that legal requirements can be formulated accordingly, but it is of no immediate use to the end-user. To ensure measurability and enforceability, product-group specific standards should be developed, considering real life conditions. We encourage the European Commission to issue a standardisation request to that respect. As the standardisation work takes time, we recommend not to immediately set requirements on reliability to a broad spectrum of products, but to apply this practice only to a limited number of product categories as pilot cases and use the experience for other product categories and to further develop the standards.

Reusability

Reusability is the ability to reuse a product. Core elements which influence reusability are maintenance, repair, refurbishment. The European standard EN45554 addresses these elements on a horizontal level. Product specific elements need to be developed. We encourage the European Commission to issue a standardisation request to that respect.

If applicable, neutralising or deleting stored user data including a reset to factory settings should be ensured.

Upgradability

The ESPR should clearly define the term 'upgradability' as this concept could have broad meaning and application. Upgradability as it pertains to electronic products or the embedded software should be done under manufacture's specifications to avoid incompatible modifications of hardware or software creating safety and security issues.

Reparability

Reparability, which not only requires the availability of spare parts but equally important an adequate service network, is an essential element to prolong the lifetime of a consumer-product. Where replacement of products does not provide sufficient

efficiency gains, extending the product's lifetime provides a major reduction on environmental impact as it delays the need to acquire a new product.

In the product specific implementing acts for dishwashers, washing machines, washer-driers and cooling appliances, minimum availability requirements (7 or 10 years) on pre-defined so-called "critical" spare parts have been set. We strongly support the European Commission's approach to distinguish between safety relevant parts – which are to be made available to professional repairers only – and non-safety relevant spare parts - which are to be made available to all. We recommend the deployment of this concept for other product categories.

An enumeration of parts essential for the proper functioning of the product and split between safety relevant and not safety relevant parts can be drawn up. Including such lists in legislation should be avoided. Instead, the legislation should be limited to essential requirements and such parts lists should be defined in harmonised standards, subject to regular reviews in line with technological evolution.

Furthermore, it should be legally clarified what the consequences are when a certain product does not contain some of the listed essential parts. This is of crucial importance whenever information about the reparability of a product – by means of an index, for example – is declared, as it will influence the calculation and thus the result of the index and its impact on the purchasing decision of end-users.

The replacement of parts subject to wear and tear should be considered as maintenance and not repair. Such parts should not be part of the list of critical parts/harmonised standards. To ensure the availability of spare parts, we support a 'repair as produced' exemption for spare parts in vertical legislation. It offers the possibility to produce and place on the market spare parts for older products as they were at the time of the product's production and would not be hampered by newer material or performance requirements (excluding hazardous material restrictions of course).

Measuring reparability and providing information on the product's reparability should be fostered. Product specific standardised measurement methodologies are needed for that, which should be based on the already available horizontal standard EN 45554. We encourage the European Commission to issue a standardisation request to that respect.

Presence of substances of concern

We are concerned about the suggestion to regulate substances of concerns through the Ecodesign Framework. The EU already has chemical regulations (REACH and RoHS) and some specific product regulations (ELV and Batteries) which provide for explicit chemicals management. This provision goes against the chemical's strategy proposed by the European Commission only two years ago. Furthermore, we are concerned that the proposal includes a definition of "substances of concern" that is not in line with the current definitions in other product legislation and introduces a new criterion "negatively affects the re-use and recycling of materials in the product in which it is present" as this is at the same time extremely narrow and extremely wide. To avoid double regulation, and as mentioned in the considerations on the scope of this

Regulation, the ESPR shall only refer to specific regulations (e.g. REACH) and not regulate on the restriction of chemical substances.

Energy use or energy efficiency

We believe that the approach currently followed to address energy use and energy efficiency requirements should be continued. We are concerned about the possible introduction of requirements related to in-use measurement of energy consumption or performances, as foreseen in Article 31. This could not only lead to an excessive cost burden due to the additional parts needed to measure with high accuracy the power consumption, but we don't see the added value of such requirement. On the contrary, it could mislead the end-user that would see different values from the ones declared and measured under standardized test conditions.

Resource use or resource efficiency

We do not understand the listing of "resource use or resource efficiency" as a stand-alone parameter. In our opinion this parameter includes circularity aspects already addressed by other more specific products parameters such as environmental footprint, recyclability, recycled content, repairability etc. Therefore, we propose to either delete the title or upgrade it to a higher hierarchical level.

Recycled content

Recycled content is directly related to recyclability. As a prerequisite for recycled content, we support adequate collection, sorting and recycling systems, which guarantee that end-of-life products are properly recycled, and that secondary raw material (contributing to recycled content) is being produced at a reasonable market price. It should be ensured that sufficient recycled materials are available in the needed quality and quantity and according to the technical specifications of the producing industry before requirements on recycled content are set. To increase available recycled content, not only better waste collection sorting and recycling systems, stronger and competitive European single market for secondary raw materials, higher recycling efficiency and minimum quality standards are needed, but also tax incentives.

Increased recyclability will lead to more recycled material, which, eventually – once minimum quality standards for secondary raw materials have been developed – can be used in the production of (identical/similar) products. Consequently, the product will contain more recycled content.

We suggest to primarily place regulatory focus on recyclability and the quality and technical characteristics of the recycled material, as described below.

To increase the uptake of secondary raw materials by the industry, we encourage the development of minimum quality standards for secondary raw materials, in line with the quality and technical expectations of the producing industry. This is especially needed for recycled plastics.

We underscore the risks of a potential proposal for a declaration of recycled content used in a product. Since it is impossible to verify the difference physically or chemically between a virgin and a recycled material in a product, manufacturers would have to rely on a chain of custody declaration. The European standard EN45557 provides a method to document the origin of the used recycled material in the chain of custody. However, using the chain of custody documentation method, although practically the most feasible way, has its own limitations as the chain of custody very often goes beyond the Union's borders, where market surveillance authorities have no jurisdiction.

Chemical recycling should not be excluded as a source for materials which can be accounted for as recycled material. However, it should be limited to waste plastic fractions which cannot be recycled materially. Once sufficient recycled materials are available on the market, the setting of recycled content requirements could be considered on material level rather than on product level. The more recycled material is used, the higher will be the environmental impact reduction, regardless for which product the material is used.

Possibility of remanufacturing and recycling

Recyclability of a product describes the theoretical recycling potential of that product. Recyclability will lead to more circularity, where more recycled content means reduced climate impact as it reduces the amount of primary raw materials used. Real-life recyclability will depend on numerous other elements which to a great extent lie outside of the sphere of influence of the manufacturer. The existing horizontal standard EN45555 should serve as a basis for determining the recyclability rate, but only in relation to the current state of the art of recycling technology as recycling technology as well as recyclability of the concerned products evolve over time. We support transparency regarding the recyclability of products as it serves as a key indicator to forecast the recycling potential during end-of-life treatment. However, recyclability must be quantified using standardize methodology that is actionable, reliable, verifiable, and comparable and it must represent the actual recyclability in the market.

Environmental impacts, including carbon and environmental footprint

The calculation of Product Environmental Footprints (PEFs) and Product Carbon Footprints (PCFs) must be carried out according to uniform, transparent, verifiable, and comprehensible methods to ensure comparability of the results. It should be appropriate to the product group and based on industry accepted, standardized methodology that considers the diversity of products, its most relevant aspects and its impacts over its life cycle, and depth of primary data reasonably anticipated to be available in the supply chain. Thereby, the carbon and environmental footprint of products should eventually meet regulatory targets, but before targets can be set, the method for measurement should be determined based on industry standards appropriate to the specific product groups. The approval of internationally recognised LCA standards and third-party verified industry benchmarks must be seriously considered. It must be clarified how to deal with data from products from non-EU

countries that are not subject to EU law. This also touches on the general question of effective market surveillance to exclude competitive disadvantages for manufacturers in the EU compared to suppliers from non-EU countries.

Expected generation of waste materials

It is not clear what the products' expected generation of waste materials means as a separate ecodesign requirement.

Common specifications vs. Standardisation

We understand that the European Commission wants to include a safeguard in case standardisation bodies are unable or unwilling to adopt standards in the realm of sustainable product policy. However, we are wary that the Commission diverges from the New Legislative Framework approach that leaves technical specifications up to the European Standardization Organisations. The proposal should better promote reliance on international industry-driven consensus-based standards to avoid fragmentation with global regulatory environments and avoid the development of region-specific technical specifications.

Digital Product Passport (DPP)

We understand the rationale of the European Commission to implement a Digital Product Passport (DPP) and, in principle, do not oppose it. If properly designed, the DPP can be an important building block for the transformation to a sustainable and climate-neutral economy and society.

The Commission proposes to introduce a digital product passport for all products which have been within the scope of a product-specific implementing measures. This is a sensible approach. We support the European Commission's approach to tailor the information requirements to the different product categories. The Commission should avoid duplication of regulatory requirements and/or inconsistencies in requirements in other legislative instruments for product categories that already are regulated.

The DPP will require a unique product identifier which is why products already in the market will need to be exempted from this requirement.

It is essential that the DPP is not applied at item level. DPPs at the item level would results in an enormous administrative, implementation and cost burden for manufacturers. Disproportionate costs to manufacturers notwithstanding, DPPs at the item level would have indirect costs related to data storage, from energy consumption in data centres, that would have negative implications for the EU's climate neutrality objective and would outweigh any potential benefits for the Circular Economy. Unlocking Circular Economy benefits for business and consumers is still possible if DPPs are applied at the model or batch level and would be consistent with the EU's well-

established New Legislative Framework template for Union harmonisation legislation for products which requires declaration of conformity at the level of the product model.

Access rights to the DPP should be differentiated for various categories of data-user, i.e. the customer, a professional repairer, or a market surveillance authority. Their respective access should be determined on a need-to-know basis in order to protect confidential business information. Key stakeholders are the producers, end-users, repairers, collectors, and recyclers. The regulator shall define the content of information of the DPP. It is paramount that, as provided for in the proposal, access rights are delimited in product-specific ecodesign implementing acts and not in generic one-size-fits all horizontal implementing acts. From a horizontal perspective, legal consistency between DPP access rights in product-specific ecodesign delegated acts and the Data Act (when published in the Official Journal) should be guaranteed. Protocols and security measures should be put in place to safeguard data privacy and confidentiality during the data sharing process and ensure that data is verified.

To support and facilitate product compliance, the DPP should offer a single digital solution that is not an additional marking requirement, but rather the basis for an integrated system. In a first instance the DPP should tap from already available mandatory information systems such as the SCIP and EPREL databases. Furthermore, we also support the intention for the DPP to improve traceability of products along the value chain, which is why we are in favour of a dynamic DPP where all the stakeholders contribute to delivering relevant information into the DPP. The content made available by any provider should be stored and managed by that provider in a decentralised system. Communication between the provider's systems should be done in an encrypted way to protect the data.

Given the existence of long value-chains for most product categories, manufacturers placing the final product on the EU market depends on the information provided by their suppliers. Suppliers of articles (e.g. product components), substances or mixtures are best placed to provide sustainability information to manufacturers who can then integrate that in the DPP. We recommend therefore EU policymakers that the ESPR explore legal instruments to ensure suppliers, including those located outside the EU, provide manufacturers with all relevant information that is needed for the DPP. Such a legal instrument can ensure a seamless transmission of information throughout the value-chain as long as it is adequately consulted with the relevant stakeholders.

We support that differentiation in required information to be provided in the DPP should be made between the different applied business models. "Product as a Service" (PaaS) business models, which typically have no transfer of ownership of the products, would require less information to be provided as the producer of the products will remain in charge of the product over its entire lifecycle.

The DPP should consider the technological improvement of a certain product on Stock Keeping Units (SKU) level. Even for one commercial reference, different technical levels are possible.

Evolutions in the regulatory landscape should not be applied retroactively on the DPP, as this would create excessive administrative burden. The information in the DPP should always be linked to the date at which the product is placed on the market and thus to the regulatory state of the art on that date.

We recommend to also consider in an impact assessment of the cost implications (for end-users) and the environmental impact of the implementation of a DPP.

We plead for a suitable verification system for and enforcement of the content of the DPP.

Ecodesign Forum

The member states, standardisation bodies and, above all, companies must be sufficiently involved in the development of product-specific delegated acts. This is largely ensured in the drafting of product-specific implementing regulations for the previous Ecodesign Directive according to the available experience. Therefore, the composition of the Ecodesign Forum (Article 17 of the draft regulation) is crucial.

Obligations for manufacturers

For repairs it is important to provide information. However, information should only be provided to actors that are able to undertake the specific repair. The general requirement in Art. 21 (7) to provide detailed instructions to consumers and other end-users for repair purposes is therefore a product and consumer-safety issue and should be revised to account only for those repairs that are deemed safe to be undertaken by consumers themselves accordingly.

Presumption of conformity

In the sense of a level playing field, mechanisms should be found that enable SMEs in particular to implement the requirements of the Ecodesign Regulation simply and unbureaucratically. This should include that no dependencies on certification bodies, labels or auditors are established. This also applies to the inclusion of the EU Ecolabel (Article 34 of the draft regulation). It is questionable whether the EU Ecolabel takes into account the same aspects for all product groups to the same extent as outlined in the draft. Since the EU Ecolabel would be "upgraded" here, it must be examined whether the requirements are applicable to the product groups covered by the delegated acts and whether the requirements are comparable or compatible with the intended minimum standards in the draft Ecodesign Regulation.

Bitkom vertritt mehr als 2.000 Mitgliedsunternehmen aus der digitalen Wirtschaft. Sie erzielen allein mit IT- und Telekommunikationsleistungen jährlich Umsätze von 190 Milliarden Euro, darunter Exporte in Höhe von 50 Milliarden Euro. Die Bitkom-Mitglieder beschäftigen in Deutschland mehr als 2 Millionen Mitarbeiterinnen und Mitarbeiter. Zu den Mitgliedern zählen mehr als 1.000 Mittelständler, über 500 Startups und nahezu alle Global Player. Sie bieten Software, IT-Services, Telekommunikations- oder Internetdienste an, stellen Geräte und Bauteile her, sind im Bereich der digitalen Medien tätig oder in anderer Weise Teil der digitalen Wirtschaft. 80 Prozent der Unternehmen haben ihren Hauptsitz in Deutschland, jeweils 8 Prozent kommen aus Europa und den USA, 4 Prozent aus anderen Regionen. Bitkom fördert und treibt die digitale Transformation der deutschen Wirtschaft und setzt sich für eine breite gesellschaftliche Teilhabe an den digitalen Entwicklungen ein. Ziel ist es, Deutschland zu einem weltweit führenden Digitalstandort zu machen.

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