



# Metaverse – a Chance for Europe

Bitkom's Feedback to the European Commission's  
Call for Evidence | »Virtual worlds (metaverses) –  
a vision for openness, safety and respect«

The metaverse is the future of the internet. How it will be shaped and what role Europe will have in building it is being decided now. Therefore, we very much welcome the fact that the European Commission is already addressing the metaverse at this early stage and recognises the opportunities it will open. We, too, see a broad spectrum of possibilities through the metaverse – from remote working to learning and teaching, construction, maintenance, remote assistance and even inclusion and saving resources.

We also strongly support the European Commission's commitment to make the EU a leading player in the metaverse by creating an enabling environment for investments in research, innovation, deployment, integration and expansion of the technologies needed for virtual worlds as well as an enabling environment for companies and content creators in the EU. We would like to highlight the aspect that the necessary know-how for the metaverse must be created as well. In this respect, we welcome the intention to promote a talent pool and skills development for specialists necessary for the metaverse who can address the broad requirements from a technical, creative and business perspective.

Even though we very much welcome the Commission's initiative overall, we would appreciate if the European Commission could take these recommendations into account, in order to leverage and not squander the EU's great potential in the field of the metaverse/virtual worlds.

- Build on existing regulations, do not create a new Lex Metaverse.
- Dismantle regulations that hinder the development of the metaverse.
- Involve all players, businesses, and the public in building the metaverse.
- Build on existing standards and specifications, and support the European vision of the metaverse within the framework of international approaches.
- Aim for an open, interoperable, and interconnected metaverse ecosystem that can be accessed by anyone, anywhere, and at any time globally.

## Recommendations

### No specific metaverse regulation needed and possible

We share the view that the EU already has a strong legal framework to address potential impacts of virtual worlds on aspects such as competition, cybersecurity, artistic creation, data protection and consumer protection. This should be built upon as we move into the metaverse. It can then be observed whether the existing legal framework (for example the General Data Protection Regulation, Digital Services Act, Digital Markets Act, Net Neutrality Regulation and the Unfair Commercial Practices Directive) is fit for purpose. If not, it could then be adapted in a targeted manner. We therefore reject a new fundamental metaverse regulation or a kind of Lex Metaverse. Moreover, an all-encompassing metaverse regulation could hardly do justice to all the very different metaverse use cases from the areas of consumer metaverse, enterprise metaverse and industrial metaverse. In particular, B2B use cases of the industrial metaverse, for example, must be considered differently than B2C use cases of the consumer metaverse. A regulatory approach that is oriented towards the B2C

environment could hinder B2B use cases – i.e., precisely those use cases where Europe has a particularly good starting position.

## Removing regulatory hurdles that stand in the way of the metaverse

The metaverse will be built on the basis of a continuous development of various existing technological building blocks. For this reason, the development of the metaverse must be supported by a critical review of existing regulations rather than implementing new ones. Regulations that make the use of metaverse applications impossible or difficult must be identified and dismantled. This is the case, for example, if existing regulations prevent remote training or remote counselling respectively training and counselling in virtual worlds, or if a strict written form requirement stands in the way of the digital conclusion of contracts. In case rule sets are deemed unavoidable: enable the stakeholders to create technical rules through the existing institutions creating specifications and standards, instead of enforcing inhibiting laws.

## Making the network infrastructure fit for the metaverse

We expressly welcome the fact that the necessary network infrastructure is being considered from the beginning in the construction of the metaverse – as it is crucial for the overall advanced digitization. While our networks are powerful enough to handle today's metaverse applications, constant improvement of the network infrastructure is required for any digital innovation. It is therefore unavoidable to maintain the expansion of high-speed internet and constantly fine-tune the expansion goals to align with the demand. To this end, the corresponding capacities must be created and hurdles that stand in the way of network development must be removed. We need to keep our network infrastructure fit for the metaverse.

## The development of the metaverse can only succeed with the participation of all players

The development of the metaverse will only succeed if companies of all sizes collaborate to boost innovation and speed up to path towards the metaverse. It is a critical foundation to embrace greater collaboration between the public sector and the private sector to bring the highest benefits to anyone. In this area, open initiatives to create an open, interoperable metaverse can be taken up, for example, within the framework of the Metaverse Standards Forum or the World Economic Forum's initiative on the metaverse. Companies in Europe should be given the necessary support to build the metaverse.

## Do not reinvent the wheel: Build on existing standards, link to international initiatives

When setting up the metaverse, it is essential to build on existing standards and specifications and not to confuse actors by reinventing the wheel. In many cases,

established solutions already exist in the areas of augmented and virtual reality, 3D data, but also Industry 4.0. Forums such as the Metaverse Standards Forum or the European and International Standardization Bodies are already established places where metaverse stakeholders work together to make standards fruitful for the metaverse. When it comes to creating new standards for the metaverse, unilateral European approaches should be avoided. Instead, it is important to support international approaches such as the Joint Standardisation Evaluation Group for the metaverse of ISO and IEC and to secure the European vision of an interoperable metaverse within its framework. The ISO and IEC structures, for example, enable participation of all stakeholders, increasing legitimacy, trust, and related adoption. The past has shown that successful standards have usually emerged bottom-up, from industry and users.

## Creating a basis for international data transfers

Like today's internet, the future metaverse or virtual worlds will not be limited to the EU. Global data transfers will be an integral part of it. Therefore, international data transfers must be legally secure. A logic according to which metaverse-related data needs to be stored only in Europe will not be possible to implement. Current discussions for international data transfers in the Data Act and the well-known hurdles the GDPR put in place for global data flows need to be kept in mind – a functioning metaverse will need a legally secure framework in the future for global data flows, data processing and data storage.

## Educate about the metaverse and its potentials

To make the EU a leading and central actor in the development of the metaverse, a coordinated education and information campaign on the metaverse would be desirable. Too many citizens are still unfamiliar with the concept of the metaverse or virtual worlds. Often it also evokes fears, influenced by dystopian literature or movies. In a representative survey by Bitkom in the summer of 2022, for example, 67 percent of Germans aged 16 and older said they had never heard or read about the metaverse, and even though a good 20 percent were open to metaverse activities, about half were afraid of the metaverse in general or of the metaverse creating a virtual parallel world.<sup>1</sup> Many companies also lack knowledge about the metaverse and its possibilities. In mid-2022, only six percent of all companies in Germany with 20 or more employees had already dealt with the metaverse at all, while 12 percent planned to do so in the future.<sup>2</sup> This means that far too many companies are in danger of missing out on the opportunities of the metaverse. It is therefore essential that companies in Europe are not only financially supported on the way to the metaverse, but also educated about the benefits of the metaverse.

<sup>1</sup> Bitkom: Die Zukunft der Consumer Technology 2022 [The Future of Consumer Technology 2022], <https://www.bitkom.org/Bitkom/Publikationen/Zukunft-Consumer-Technology-2022>

<sup>2</sup> Bitkom: Beim Metaverse ist die deutsche Wirtschaft gespalten [The German economy is divided on the metaverse] <https://www.bitkom.org/Presse/Presseinformation/Metaverse-deutsche-Wirtschaft-gespalten>

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