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ASSESSMENT OF THE PARTIES' ELECTION PROGRAMMES FOR THE 2025 FEDERAL ELECTION

Berlin, 27 January 2025

1. SPD Election Programme

Brief assessment: From the perspective of the eco Internet Industry, the consolidation of administrative digitalisation responsibilities within a Ministry of Digitalisation makes particular sense. However, beyond administration, it would also be desirable to have a stronger consolidation of competencies in the broader field of digital policy. The SPD's proposals for reducing bureaucracy and relieving energy-intensive large consumers can be viewed positively. However, eco critically perceives additional transparency obligations beyond the framework of the Digital Services Act (DSA). eco also negatively reviews the statements on data handling in operations, as this could lead to a fragmentation of the Single Market in the field of data usage. Furthermore, no concrete statements are made regarding the expansion of digital infrastructures or the teaching of digital skills in schools.

▪ Digital State

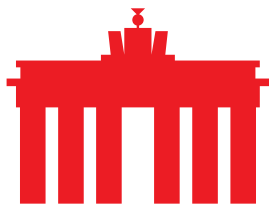
The SPD would like to consolidate the responsibilities of administrative digitalisation in a **Ministry of Digitalisation** (p. 35) and provide the relevant financial resources and authority for this purpose. As they see it, authorities should cooperate more effectively to rapidly implement key administrative digitalisation projects. The SPD wants to accelerate and automate administrative processes with the help of AI. The **widespread use of eID** (p. 36), including EU-wide compatibility, is planned to be promoted. A central citizen account (DeutschlandID) is intended to be introduced to provide administrative services centrally.

The **exchange of data between public authorities** (p. 36) is aimed to be simplified and a system is to be set up by means of an interstate agreement between the federal and state governments. Additionally, the SPD seeks to implement registry modernisation.

▪ Cybersecurity & Law Enforcement on the Internet

The SPD intends to strengthen the competencies and powers of the security authorities for combatting cybercrime. The **Federal Office for Information Security (BSI) is expected to act as the central agency for cyber and information security** (p. 42).

The party plans to establish **clear rules for combatting hate crime** (p. 43) and online penalties, and also to better protect and enforce the rights of affected individuals through the creation of collective legal action rights.



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With regard to global platforms, the SPD emphasises the necessity of self-regulation of the platforms with regard to **protection against disinformation** (p. 47), but wants to demand effective moderation. The SPD also proposes requiring **platform operators to remove illegal content** (p. 43), to **disclose their algorithms** (p. 47) and to check them for manipulative or discriminatory practices. The SPD is committed to the strict implementation of the Digital Services Act (DSA).

In addition, the party advocates for **effective age verification options and a digital law for the protection against violence** (p. 43), in order to enhance youth protection and combat digital violence.

▪ **Competitiveness & EU Single Market**

The SPD aims to reduce bureaucracy nationwide, particularly by simplifying and digitalising processes, as well as documentation and reporting requirements.

Approval fictions (p. 35) are intended to promote investment and planning security.

Regarding data usage in companies, the SPD is committed to strengthening legal certainty in **the handling of data in companies** (p. 10). They also want to boost the co-determination of works councils in the deployment of AI.

The **use of data and AI** (p. 27) is intended to be promoted particularly in the healthcare sector. The SPD also seeks to ensure a fair provision of data to improve mobility in rural areas.

The **research on technologies** (p. 7), such as AI or quantum technologies, is planned to be intensified at both the national and European levels. Moreover, their viewpoint is that AI research should focus primarily on public benefit.

The SPD aims to strengthen the **European Single Market** (p. 6), with digitalisation playing a prominent role in this process.

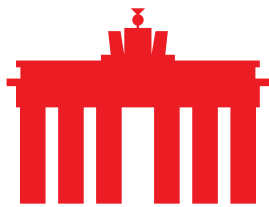
▪ **Infrastructure & Energy**

The SPD wants to **invest in digital networks** (p. 2).

The SPD aims to **reduce and stabilise energy prices** (p. 3) and thus ensure planning and investment security. Specifically, they believe that grid fees should be stabilised and capped, and that energy-intensive **large-scale consumers without flexibility potential should continue to benefit from relief measures**. To relieve the burden on all consumers, the SPD proposes to reduce the **electricity tax to the EU minimum level** (p. 4). Electricity and heating networks, as well as storage capacities, are planned to be expanded.

▪ **Education**

The SPD sees **media literacy** (p. 47) as a core competency in the digital age and wants to promote it across age groups. To enable more digital education in schools, the SPD wants to **continue and upgrade the Digital Pact for Schools** (p. 13), as well as create further financial opportunities within the framework of a new “Future Pact”.



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2. CDU/CSU Election Programme

Brief assessment: The creation of a Federal Ministry for Digital Affairs with comprehensive digital policy competencies is considered to be a positive step. However, such a ministry must also be equipped with the necessary resources. From eco's perspective, stronger cooperation between the federal and state governments on the issue of cybersecurity could bring more coherence to cybersecurity regulation. The Internet Industry strongly opposes the announced reintroduction of data retention. However, eco welcomes the planned holistic expansion of the digital infrastructure ecosystem and the classification of network expansion as a matter of paramount public interest. Equally welcome is the avoidance of additional burdens on large-scale electricity consumers. The prioritisation of digital and media literacy in school education, including the introduction of computer science as a school subject, is also viewed positively.

▪ Digital State

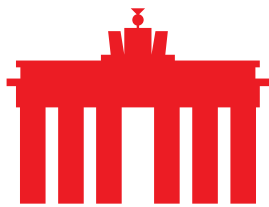
The CDU plans to combine responsibility for digital policy and the administrative digitalisation administration in a **Ministry of Digitalisation** (p. 28). At the same time, at least 10% of administrative staff in ministries and the German Bundestag are to be cut.

The digital execution of administrative services is to become the standard. The **"Once-Only" principle** (p. 77) is planned to be consistently implemented, with a particular focus on company accounts. The CDU aims to introduce **DeutschlandID** (p. 27) as a central and eIDAS-compatible citizen account. The party wishes to advocate for EU-wide interoperable digital ID functions. The written form requirement is to be reviewed.

▪ Cybersecurity & Law Enforcement on the Internet

The **Federal Office for Information Security (BSI)** is planned to be expanded as the **central office for cyber and information security in the division of the Federal Ministry of the Interior (BMI)** (p. 39). To respond to dynamic developments, security authorities are intended to be equipped with the necessary powers and resources in the field of cybersecurity. Capacities at the **federal and state level, as well as civil and military capabilities, are desired to be better connected** (p. 39). The National Cyber Defence Centre is scheduled to be further developed, and cyber reserves are planned to be strengthened.

The **CDU aims to reintroduce data retention** (p. 38). Additionally, online searches and other digital surveillance measures should be made possible. The CDU would like to make the **GDPR** more practical for everyday through standardised procedures. The CDU would also like to eliminate redundant structures in data protection.



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The CDU would like to implement the **Digital Services Act (DSA)** (p. 39), focusing on transparency, combatting disinformation and youth media protection.

▪ **Competitiveness & EU Single Market**

The CDU views AI as a prerequisite for economic development and believes that the **AI Act** (p. 27) should be implemented with minimal bureaucracy and an innovation-friendly manner. Furthermore, they want Germany to become a competence centre and innovation hub for future technologies. To this end, **3.5% of GDP should be invested in research** (p. 3), for example in AI or quantum computing.

The CDU considers data as “the gold of the 21st century” and therefore aims to **simplify data usage** overall (p. 28). Contractual freedom should also play a role in data policy. Overall, the party seeks to move away from the principle of data minimisation.

To reduce bureaucracy and overregulation, the Union is seeking a “**one-in-two-out**” **rule for bureaucracy and an “Anti-Gold-Plating Law”** (p. 15). The strengthening of the National Regulatory Control Council is also targeted.

The **Digital Single Market is intended to be strengthened** (p.28). The focus is on clear and uniform regulations, modern competition law, a European cloud, and European storage and computing capacities.

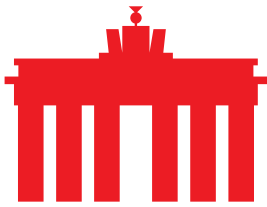
▪ **Infrastructure & Energy**

The CDU sees digital infrastructures, particularly **data centres, as a prerequisite** (p.27) for innovation and competition. The CDU wants to accelerate the expansion of broadband and mobile networks to provide better coverage, especially in rural areas. From their standpoint, barriers to this expansion should be removed and, with the help of an acceleration law, the expansion of **mobile communications and fibre-optic networks should be prioritised as an overriding public interest** (p. 28) until the expansion targets are met. When it comes to fibre-optic expansion, the CDU favours on more competition, cooperation models and reliable funding.

The CDU calls for more holistic approach to energy infrastructure. In particular, the focus is intended to be on **cross-border energy grid expansion** (p. 19). The aim is to mobilise more private capital for the integrated expansion of the energy system. Electricity bidding zones are planned to be retained. Grid fees are intended to be reformed, while simultaneously avoiding **burdens on large consumers without flexibility options** (p. 20). The expansion of all climate-friendly and system-beneficial generation capacities is aimed to be accelerated.

▪ **Education**

The CDU sees STEM subjects as the foundation for securing the future and therefore seeks to increasingly integrate both **computer science and digital and media skills into curricula** (p. 64). They want to qualify teachers for teaching these competencies based on research and, where necessary, make the required technical equipment available at secondary schools. The **Digital Pact for Schools** (p. 64) should also be continued.



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3. Alliance 90/The Greens' Election Programme

Brief assessment: The plans for administrative digitalisation and introducing a digital check are positively reviewed. However, while the simplification of data protection law and the unbureaucratic implementation of the AI Act are fundamentally positive, eco views the statements on tightening copyright law for training data critically. The potential expansion of the Digital Services Act (DSA) is also perceived as problematic. The proposed adjustment of SME thresholds could provide relief for companies, but, as eco argues, companies of all sizes need to be relieved of bureaucracy. Positive developments are considered to be the improvement of conditions for private-sector-driven telecommunications network expansion and the acceleration of approval processes.

▪ Digital State

The Greens plan to further develop the digital checks. The **“Once-Only” principle** (p. 10) are intended to be consistently implemented. **Central digital services** (p. 18) such as the BundID and the German app are viewed to be promoted. In addition, **uniform IT standards** (p. 18) across the federal government, federal states and municipalities are considered crucial by the Greens.

▪ Cybersecurity & Law Enforcement on the Internet

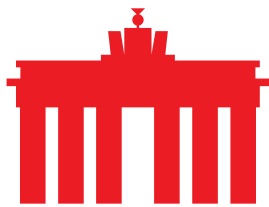
A law to strengthen cybersecurity is being sought by the Greens. In addition, the **Federal Office for Information Security (BSI) is planned to be strengthened as the central office for cyber and information security** (p. 60). **The Greens oppose data retention and chat control** (p. 50). Instead, they want to rely on a Quick-Freeze approach.

The **data protection law** (p. 19) is intended to be simplified, while duplicate regulations in this area should be reduced. Responsibilities should be bundled for certain sectors.

The **Digital Services Act (DSA) is planned to be consistently implemented and, where necessary, improved** (p. 50). With the help of a Digital Protection Against Violence Act, the Greens want hate speech to be deleted, while accounts that spread it should be blocked. In addition, their perception is that **better standards for youth protection** (p. 39) and reporting offices for abusive content online should be established and this content deleted.

▪ Competitiveness & EU Single Market

The Greens want future technologies such as AI or quantum computing to be promoted. The aim is to invest **at least 3.5% of GDP to flow into research on key technologies** (p. 13), and to establish more experimental spaces such as real-world laboratories. The party also wants to expand production capacities for key technologies.



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The Greens would also like to have the AI Act implemented as unbureaucratically as possible. A **strengthening of copyright law** (p. 54) with regard to AI training data is to be examined.

From the Greens' angle, digital business models, especially in the areas of AI or cybersecurity, should receive fundamental support. Additionally, the **WIN initiative (growth and innovation capital for Germany) is aimed to be extended** (p. 11) and start-ups should benefit from better tax conditions. Furthermore, the **threshold for SMEs** (p. 10) should be raised so that a larger circle of companies could benefit from SME exemption rules.

The European Single Market should be further promoted and **expanded into a deeper Digital Union** (p. 12).

▪ **Infrastructure & Energy**

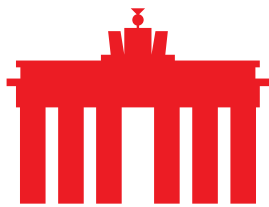
The Greens aim to create better framework conditions for the **commercial expansion of fibre-optic and 5G** (p. 19). In particular, they seek to speed up approvals, use alternative installation methods and open access. To accelerate expansion in structurally weak and rural areas, the state gigabit funding programme is planned to be increased. The minimum bandwidth is intended to be gradually increased to strengthen consumer rights.

To transition to 100% renewable energy, the Greens are counting on the **digitalisation and flexibilisation of the energy sector** (p. 22). A strong European electricity market should be promoted by expanding cross-border grids with European neighbours. The party would like to subsidise transmission grid fees and lower the **electricity tax to the European minimum** (p. 22). The **expansion of heating networks** (p. 23) is envisioned to be accelerated by extending and strengthening funding and providing public guarantees for private investments.

▪ **Education**

The Greens view school digitalisation as a government responsibility and believe that a **"Future Investment Programme for Education"** (p. 35) should modernise schools. The Greens are striving for stronger cooperation between the federal and state governments on education policy.

Digital education is also considered to be important beyond school education and would be promoted with a **Digital Pact for Older People** (p. 39).



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4. FDP Election Programme

Brief assessment: The establishment of a Federal Ministry for Digitalisation is a positive step, provided it is equipped with adequate resources. The Internet Industry views the Once-Only guarantee and the legal right to digital administrative services as welcome initiatives. The AI Act is planned to be implemented in a more innovation-friendly manner, which eco sees as a positive approach. The clear commitment to net neutrality, the rejection of data retention and opposition to chat control are also considered as positive aspects. eco also welcomes the planned classification of network expansion as an issue of overriding public interest and the expansion of a high-performance data centre infrastructure. However, eco is critical of additional liability rules for damages caused by security vulnerabilities.

▪ Digital State

The FDP wants to establish a **Ministry of Digitalisation** (p. 34) to consolidate competencies for administrative digitalisation. They aim to introduce a **Once-Only guarantee** (p. 34) and a legal right to digital administrative services. The FDP wishes to have administrative digitalisation based on the **“Government as a Platform” model** (p. 34). A central **citizen account (DeutschlandID)** (p. 34), a new digital wallet and AI citizen assistants are intended to enable digital interaction with authorities.

▪ Cybersecurity & Law Enforcement on the Internet

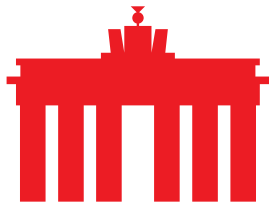
In the field of cybersecurity, the FDP wants to reorganise state responsibilities. **The FDP opposes state trojans, blocking of Internet content, chat controls, upload filters and data retention** (p. 20). Instead, the party would like to see a Quick-Freeze model and orderly vulnerability management system for cybersecurity. The FDP would like to prescribe **“Security by Design”** and establish liability rules for damages caused by security vulnerabilities.

The FDP aims to **unify data protection supervision** (p. 9) and simplify data protection law, as well as improve enforcement through uniform interpretation.

The **FDP wants to implement the Digital Services Act (DSA)** (p. 23), while ensuring that platform operators’ due diligence obligations do not lead to restrictions on freedom of expression.

▪ Competitiveness & EU Single Market

From the perspective of the FDP, **Germany should become one of the world’s strongest locations for artificial intelligence** (p. 7). To achieve this, the FDP wants to establish an agency to facilitate transferring research into the business sector. The European AI Act should therefore be made significantly more innovation-friendly in its implementation, while the availability of training data should be improved.



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The FDP intends to support digital platforms and improve **data availability** (p. 38) for intermodal mobility.

The FDP wants to implement EU directives only on a one-to-one basis (p. 9) and introduce a sunset clause for new laws. They aim to abolish the reporting requirements from the European Commission's "Green Deal". Written form requirements should thus be eliminated.

The FDP seeks to deepen the EU Single Market, especially the **Single Market for digital services** (p. 48).

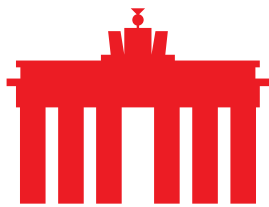
- **Infrastructure & Energy**

The FDP wants to advocate for the expansion of telecommunications networks and data centres, meaning that **mobile network and fibre-optic expansion should be classified as an overriding public interest** (p. 37). The FDP is in favour of maintaining **net neutrality** (p. 20).

The electricity **tax is intended to be reduced to the EU minimum** (p. 13) and eventually abolished. In the FDP's opinion, grid fees should be reformed, network costs should be reduced through digitalisation and dynamic grid fees, and renewable energies should be fully transferred to the market. Furthermore, they agree that regulatory barriers for rapid grid expansion should be dismantled and better coordinated with the expansion of generation and storage capacities, while predefined expansion paths for individual technologies and guaranteed purchase prices are rejected.

- **Education**

The FDP wants to introduce **both media literacy and computer science into curricula** nationwide (p. 6). AI methods should be increasingly integrated into school education. Digital and AI skills should also be taught in teacher training programmes. Schools should be modernised with **Digital Pact 2.0** (p. 5). Furthermore, the FDP also wants to focus on direct networking with the tech scene in the school sector.



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5. The Left Party's Election Programme

Brief assessment: The Left Party explicitly opposes any surveillance measures on the Internet, which eco views as a positive stance. The party's aim of an Open Data and Transparency Law is perceived as a similar positive aspect. However, the rejection of data ownership is viewed negatively by eco, as this could conflict with EU law and reduce the attractiveness of investments in data collection. The decision to no longer use proprietary software whenever possible threatens to jeopardise and set back the digitalisation of public administration. eco is critical of the scepticism regarding the use and promotion of AI. Additionally, eco rejects extra regulatory requirements for the resource consumption of digital infrastructures.

▪ Digital State

The Left Party **no longer wants to purchase or use proprietary software in public administration** (p. 62). Instead, they want to rely on self-developed open-source solutions. In addition, they aim to apply the **right to Open Data** (p. 62) to all publicly collected data, including privately offered public services. They would still like to link the electronic ID card and the health card to a physical chip card.

▪ Cybersecurity & Law Enforcement on the Internet

The Left Party wants to close IT security gaps, enable research in this area and make the **Federal Office for Information Security (BSI) more independent** (p. 62). They believe that the BSI should also provide more support for municipalities and SMEs.

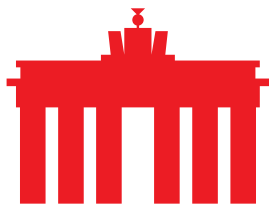
The Left Party wants to ban surveillance measures such as **data retention, inventory data requests, state trojans, chat control and biometric video surveillance** (p. 49).

In order to implement the **Digital Services Act (DSA)** (p. 62), the Left Party wants to provide the Federal Network Agency (BNetzA) with additional resources. Furthermore, they aim to introduce additional **transparency and liability standards for online platforms** (p. 61).

▪ Competitiveness & EU Single Market

The Left Party rejects data ownership (p. 62). They see more risks than benefits in the use of data by large companies. The party is sceptical of autonomous driving due to concerns over data protection and liability issues. They are also seeking for an **Open Data and Transparency Law** (p. 62).

The Left Party wants the **research into digital technologies** (p. 62), such as AI, to be subject to a societal debate. The use of copyrighted data for AI training should be compensated. The party seeks to strengthen antitrust laws to break up **digital monopolies** (p. 62).



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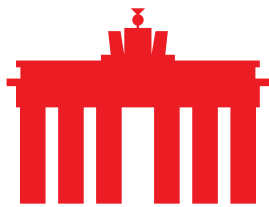
▪ **Infrastructure & Energy**

The Left Party aims to promote the **expansion of digital networks** (p. 61) at the municipal level. In doing so, they intend to avoid double expansion. They want to increase download speeds while capping prices.

In order to stabilise energy prices, a new price authority should be created to **limit price increases in the energy sector** (p. 3). The Left Party wants to reduce the electricity tax to the European minimum level. From their perspective, **energy networks should be nationalised** (p. 34) and renewable energies should be expanded with more public funding. The party aims to reduce the energy and **resource consumption of digitalisation** (p. 62) through legal requirements, particularly by introducing stricter regulations for data centres.

▪ **Education**

As the Left Party sees it, **media and data protection literacy** (p. 53) should be promoted as early as possible. For this purpose, they believe that teachers in particular should be specifically trained in AI, data protection and digital technology. The party wants to digitalise schools and emphasise the use of open-source solutions. Through a **Digital Pact for Higher Education** (p. 56), they aim to digitalise higher education.



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6. BSW Election Programme

Brief assessment: The targeted central online portal for citizens and companies as a “One-Stop Shop”, as well as the implementation of the Once-Only principle, are viewed positively by eco. However, a ban on collecting behavioural data may conflict with EU law and is therefore viewed negatively. The renunciation of climate neutrality goals is perceived on an extremely critical level. The rejection of digital learning methods is also regarded as negative.

▪ Digital State

The BSW is aiming to create a central online portal for citizens and businesses as a **One-Stop Shop** (p. 13) for all administrative services. As they see it, the “**Once-Only**” principle (p. 13) should be implemented, and software from US companies should be replaced by **open-source solutions** (p. 38). Publicly funded goods should be made freely available and the corresponding **open access infrastructures** should be created.

▪ Cybersecurity & Law Enforcement on the Internet

The BSW wants to **end international dependencies** (p. 38) and is opposed to surveillance. The BSW is critical of digital distribution platforms.

▪ Competitiveness & EU Single Market

According to BSW, freely available AI models should be promoted, although these should not be used by the private sector. When software manufacturers leave the market, the BSW believes that these manufacturers should be obliged to make their products available as **open source** (p. 38).

In the BSW’s assessment, the **collection and use of individual behavioural data should be stopped** (p. 27) and collected data should be deleted after one year, while the SCHUFA (credit rating agency) should be more strictly regulated.

It is planned that a National Decluttering Day should be introduced to **reduce bureaucracy** (p. 14).

By 2030, the BSW wants to increase **research spending to 4% of GDP** (p. 8) and invest particularly in future industries.

▪ Infrastructure & Energy

The BSW wants to lower energy prices by means of long-term energy import contracts. **Mixed technologies should be promoted instead of 100% climate-neutral technologies** (p. 4). The BSW plans to have energy networks nationalised



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and expanded with public funds. Additionally, they believe that more industrial waste heat and heat from data centres should be reused.

- **Education**

The BSW rejects digital learning methods, particularly in primary schools. In general, they **prefer analogue learning materials** (p. 19), while open-source software and AI models should be freely available for education.

About eco: With approximately 1,000 member companies, eco (international.eco.de) is the leading Association of the Internet Industry in Europe. Since 1995, eco has been highly instrumental in shaping the Internet, fostering new technologies, forming framework conditions, and representing the interests of its members in politics and international forums. eco has offices based in Cologne, Berlin and Brussels. In its work, eco primarily advocates for a high-performance, reliable and trustworthy ecosystem of digital infrastructures and services.