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Forewords

After serving for four exciting years as a member of EuroISPA’s Board of Officers, I am thrilled to welcome the new Officers. This renewed Board of Officers will bring an exciting new perspective to the Association, and I wish them all the best as EuroISPA continues to engage on crucial issues for our society, such as digital rights or encryption. I would like to thank everyone involved in EuroISPA for their trust, cooperation and guidance over the last years, and their ongoing contributions to this organisation, and especially EuroISPA’s Committee Chairs and my former fellow Officers for their leadership.

Alexandra Laffitte
Exiting EuroISPA President

It was a long journey serving EuroISPA as an Officer in a multitude of relevant policy and governance matters.

I remain committed to the Association and to supporting its activities going forward, and thank my fellow members for the support over the years.

Innocenzo Genna
Exiting EuroISPA Vice-President
I'm grateful for the trust placed in me and extend a thank you to the previous Board of EuroISPA for their leadership over the past two years. We have much to do, and there are many crucial legislative files and topics of relevance for our Association in the coming months and years. I look forward to tackling them with the active, committed participation of our valued members, and of course, my fellow Officers.

Alex de Joode
President

Our industry and our ecosystem are at the heart of the daily lives of businesses and our fellow citizens. While the very nature of the Internet is sometimes called into question, EuroISPA carries the voice of ISPs in Europe, gathers all stakeholders, and provides a forum for cooperation amongst its members.

Michel Combot
Vice-President
Forewords

I’m very proud and grateful to have been re-elected for a second term as EurolISPA Board member. During its 25 years, the Association has been an important voice for the Internet industry and I’m looking forward to continuing this active participation. Technology continuously develops, and with it new challenges arise – and EurolISPA with its members has the expertise to share on the best ways to master them.

Thomas Bihlmayer
Treasurer

It is estimated that up to 80 per cent of the legislation in our field originates from the EU. It is important to be closely involved in influencing various legislative projects as early as possible. EurolISPA’s excellent lobbying is wide-ranging. It’s great to have the opportunity to be in its core, and to bring expertise from Finland, Europe’s leading country in digital development.

Elina Ussa
Board Member
EuroISPA

at a Glance

Who we are

Established in 1997, EuroISPA is the world’s largest association of Internet Services Providers (ISPs), representing the interests of over 3,300 ISPs across the EU and EFTA countries.

EuroISPA is a collection of trade associations and companies from across Europe who work together to find common views on the main discussions on EU digital policy. With a membership of 10 national associations of ISPs, EuroISPA is recognised as the voice of the European ISPs industry and its success lies in its reflection of the views of its members regardless of their shapes and sizes.

EuroISPA engages at EU level on behalf of its members on a wide range of policy issues, including intermediary liability, data protection, cybersecurity, safer Internet, and much more. Through its active role in EU-level discussions, EuroISPA ensures that the ISP industry’s voice is at the forefront of decisions impacting the future of the Internet.

Our mission

- To protect and promote the crucial role of European ISPs in the ever-changing Internet landscape.
- To protect and promote the interests of Europe as a whole within the global Internet.
- To help deliver the benefits of this technology while meeting the legitimate concerns of those responsible for the more vulnerable members of society.
- To encourage the continued development of a free and open telecommunications market.
- To promote the interests of our members and provide common services to them where these cannot be received elsewhere.
Our vision

To be the voice of ISPs in Europe by bringing together European trade associations and companies to find common views on the main discussions on EU digital policy.
Timeline of Policy Activities 2022

January
- Meeting with the Council of Europe on Digital Services Act (DSA)
- Meeting with CERTH-ITI on Terrorist Content Online (TCO)
- Meeting with CENTR on DNS4EU

March
- Meeting with DG CNECT I.2 (Copyright Unit) on piracy of live content

May
- Meetings with the upcoming Czech and Swedish Council Presidencies on the CSAM Regulation
- Meeting with IWF on the CSAM Regulation

February
- Speech at the Council of Europe 2022 Digital Partnership Workshop
- Interview of EuroISPA by CNRS about Internet fragmentation
- Meetings on e-evidence with Belgium, Romania, Estonia, and MEP Sippel

April
- Participation in IWF 25th anniversary event
- Meeting with the French Council Presidency on the CSAM Regulation
June

- EuroISPA meeting with industry associations on DSA/CSAM Regulation
- Interview of EuroISPA by the European Commission on CSA Directive 2011/93 EU
- Meeting with MEP Vautmans on the CSAM Regulation
- Meeting with MEP Lenaers on the CSAM Regulation

September

- Meetings with Finland, the Netherlands, and Estonia on the CSAM Regulation
- Meeting with GSMA on the CSAM Regulation
- Meeting with DG CNECT I.2 (Copyright Unit) on piracy of live content
- Meeting with DG HOME on the CSAM Regulation
- EuroISPA meeting with industry associations on DSA/CSAM Regulation

October

- Meeting with Lithuania on the CSAM Regulation
- Meeting with ECTA, ETNO, and GSMA on the Russian sanctions
- EuroISPA meeting with industry associations on DSA/CSAM Regulation
- Speaking opportunity at roundtable of @ntidote research project on hate speech

November

- Meeting with MEP Zarzalejos on the CSAM Regulation
- Meetings with MEP Frankowski and MEP Heide on piracy of live content
- Meeting with GSMA on the CSAM Regulation

December

- Meeting with MEP Paul Tang on the CSAM Regulation
- EuroISPA meeting with industry associations on DSA/CSAM Regulation
## What’s ahead in 2023

### CSAM
- **Q1**: Publication of Council Progress Report
- **Q2**: Publication of CSAM Report
- **Q3**: Adoption of LIBE Committee report
- **Q4**: Vote in EP and start of trilogues

### Piracy of online content
- **Q1**: Meeting with European Commission
- **Q2**: Stakeholder hearing by European Commission
- **Q3**: Publication of European Commission Recommendation
- **Q4**: NA

### Other
- **Q1**: Monitoring the European Commission Connectivity Initiatives
- **Q2**: Start of trilogues on the Data Act
- **Q3**: Start of Parliamentary work on the Cyber Resilience Act
- **Q4**: Launch of European Commission’s Initiative on Virtual Worlds

### EurolISPA
- **Q1**: Speaking at European Internet Forum on child safety online
- **Q2**: General Meeting
- **Q3**: General Meeting
- **Q4**: General Meeting

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**25th Anniversary Celebrations**

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Our Policy Work

Andrea Monti (AIIP)

Intermediary liability is a serious matter that should be handled with the utmost care. Since the beginning of the Information Society, European ISPs have not shied away from the legal challenges that have arisen. Over time, they have contributed to the work of the legislators and supported law enforcement in the field, bearing all the costs. Unfortunately, the contribution of the ISPs has often been neglected and, in general, the regulatory approach has been to shift to them the tasks that belong to the public authorities. However, the Intermediary Liability Committee will continue to provide experience and expertise to policy makers and legislators to ensure that the rights of the ISP industry are supported in the context of the rule of law and the protection of fundamental rights.

Andreas Gruber (ISPA Austria)

In 2022, the Cybercrime and Cybersecurity Committee continued its strong engagement at EU level and beyond. Among other things, the Committee was able to ensure the inclusion of a secure data exchange system in the final text of the E-Evidence Regulation, and that the situation of small providers was sufficiently taken into account in the adoption of the NIS 2 Directive. The year 2023 will be dedicated to the national implementation of these new frameworks, where the Committee will continue to play an active role and assist its members. Besides this, new topics such as the Cyber Resilience Act will move into the focus.
Alex de Joode (AMS-IX)

Children’s online protection is a key priority for EuroISPA’s Safer Internet Committee, and our members have a longstanding relationship with law enforcement authorities to assist them in the fight against CSAM. In the last year, we have met with several EU policymakers working on the proposed CSAM Regulation to provide the technical expertise of our diverse membership on the matter. In 2023, we will continue our engagement efforts, participating in further meetings and events. EuroISPA will have a key role to play in moving away from a polarised debate and instead focusing on the technical implications of the proposed CSAM Regulation.

Asko Metsola (FiCom)

Now that almost all Member States have implemented the DSM Directive, the Innovation and Growth Committee can turn its eyes to newer, maybe more national developments. We’ll continue to monitor any proposals related to geo-blocking, the territorial dimension of the single market, and different kinds of tax levies. In addition to the Committee’s work, I will be attending the EUIPO Observatory Working Groups on EuroISPA’s behalf.

Oliver Süme (eco)

Both data protection and the legal challenges around the availability of non-personal data remain a key topic in the process of transitioning Europe into a data economy. In this regard, the analysis of overlap and interdependency of the GDPR, the European Data Act, and the upcoming Artificial Intelligence Act will be of high importance for EuroISPA’s Data Protection Committee. In addition, the Association will continue to monitor the development of the EU-U.S. Data Privacy Framework and the further legislative process regarding the ePrivacy Regulation.
Michel Combot (FFTélécoms)

In 2022, the Market and Services Committee continued its work on 5G & Network Deployment, analysing developments in each national country and identifying barriers and issues that were brought in front of EU lawmakers. Also, the Committee had a strong look at the impact of the Energy crisis on the Internet infrastructure and the services of its members and fostered the exchanges with all stakeholders. The year 2023 will be dedicated to strengthening the activities of the Committee on connectivity issues related to the Internet, in the wake of the initiative of the Gigabit Infrastructure Act proposed by the European Commission.

Malcolm Hutty (LINX)

EuroISPA actively represents the views of the European Internet industry before the most relevant Internet Governance and ICT cooperation organisations such as ICANN, EuroDIG, the Internet Governance Forum and the Council of Europe. Our International Affairs Committee brings our members the latest developments and relevant trends at international level, providing a technical forum to discuss the future of our sector.
Intermediary Liability

Over the course of 2022, EuroISPA’s Intermediary Liability Committee divided its focus between two main policy issues: the Digital Services Act (DSA) and the Recommendation on piracy of live content. At the beginning of the year, EuroISPA successfully held the last event of its series “DSA in focus” on the upcoming trilogues and the future of content moderation. Besides this, our Association reacted to the plenary vote of the DSA, encouraging policymakers to keep the DSA as a horizontal framework, thus avoiding creating obligations which would result in primary liability for service providers.

EuroISPA also had several meetings with the European Commission on piracy of live content, voicing the concerns of ISPs on strict removal obligations for intermediaries, which should not set timeframes preventing proper examination of disputed content and noting that providers should be able to choose the technical means to perform web blocking.

In 2023, ahead of the recommendation on piracy of live content scheduled for late April, EuroISPA will participate in further meetings and in a stakeholder hearing with the European Commission and rightsholders, being one of the few ISP representatives that is active on the issue. The Association will also monitor the implementation of the DSA as well as the upcoming delegated acts.
In 2022, EuroISPA actively engaged in the final stages of the negotiations of the E-Evidence Regulation and the NIS 2 Directive. In the first case, EuroISPA pushed to ensure a well-functioning cross-border cooperation between law enforcement authorities and service providers that provides the necessary legal certainty for companies and also takes into account the specificities of SMEs. In addition, EuroISPA has worked towards ensuring that security and confidentiality of data are safeguarded in the transmission of data between service providers and law enforcement authorities which resulted in the development of a new EU wide digital exchange platform. Other aspects that EuroISPA has focused on included reasonable timeframes for emergency situations, a fair system of cost reimbursement, clear provisions for data categories, as well as adequate legal safeguards and coherence among different Member States and third country laws, all while respecting fundamental rights and freedoms.

Concerning the NIS 2 Directive, EuroISPA worked towards a framework that enhances digital security in the EU without creating burdensome requirements for ISPs, particularly when it comes to the proportionality of, for example, reporting obligations, but also by encouraging the protection of encryption.

In 2023, our Association will focus on the smooth implementation of the aforementioned files, paying particular attention to the development of the digital exchange platform envisaged in the E-Evidence Regulation. Furthermore, EuroISPA will continue using its expert voice in other cybersecurity and cybercrime related initiatives, like the Cyber Resilience Act, and will keep a close eye on developments related to data retention and encryption, especially in the context of the new framework to fight child sexual abuse and, more generally, in the area of cooperation with law enforcement authorities.

**Collaborations & Network: Council of Europe**

In 2022, EuroISPA continued to build upon its long-standing cooperation with the Council of Europe, with the aim of promoting respect for democracy, human rights, and the rule of law on the Internet.
Safer Internet

In the past year, EuroISPA actively participated in several meetings and events on the CSAM Regulation and it had a key role in moving the discussions away from a polarised debate and focusing on the technical implications. EuroISPA’s main priorities on the file remained the respect of encryption in order to guarantee private and safe communications, as well as the prohibition of general monitoring obligations. Besides this, EuroISPA emphasised that blocking orders are not the most suitable and proportionate measure to fight CSAM. Our Association also engaged with EU policymakers to raise awareness on the need to further clarify the role of hotlines.

In 2022, EuroISPA provided input to the European Commission on the Revision of the CSA Directive 2011/93/EU and will continue to closely monitor the developments of the directive in 2023, as well as the Better Internet for Kids Strategy. The association will also engage in and organise events with key EU policymakers and stakeholders on the proposed CSAM Regulation, in order to develop a framework that successfully improves children’s safety online and respects the privacy of users.

Collaborations & Network: INHOPE

INHOPE is a global network of 50 member hotlines, leading the fight against child sexual abuse material (CSAM) online since 1999. INHOPE’s vision is a world free of CSAM online. They support their member hotlines through training, best practices, quality assurance, and staff welfare. The longstanding and ongoing cooperation between EuroISPA and INHOPE is reflected in a Memorandum of Understanding between the two organisations. This cooperation remains a central feature of the Association’s work on hotlines, notably in tackling CSAM. EuroISPA’s membership includes several industry-run hotlines, further reinforcing the importance of this partnership, and EuroISPA looks forward to continuing its work with INHOPE in future collaborations.
Innovation and Growth

Over the course of the past year, EuroISPA’s Innovation and Growth Committee continued to promote an innovative and open environment for digital content and services. Our Association closely monitored the developments of the European online content legislative framework, including the national implementation of the EU Copyright Directive, offering its members a platform to exchange on best practices, but also to discuss the future of Europe’s online content framework.

The new chair of our Innovation and Growth Committee, Asko Metsola, will take on the lead from 2023 onwards, striving to continue EuroISPA’s engagement on copyright issues. In this context, EuroISPA and its Internet Services Providers are ready to offer an expert voice in a wide range of areas, including audio-visual and video on demand (VoD), levies and rights management, geo-blocking and content portability, among others, with the aim of supporting the development of an ethical and cross-border online content market in the EU.

Collaborations & Network:
European Union Intellectual Property Office (EUIPO)

The EUIPO manages the European trademark and intellectual property policy. EuroISPA is a member of the EUIPO Observatory, an opportunity it uses to convey and emphasise the messages and key issues of the Internet industry with regards to intellectual property practices. The former EuroISPA President, Alexandra Laffitte, was EuroISPA’s expert for the EUIPO in 2022. The new chair of our Innovation and Growth Committee, Asko Metsola, will take on the lead from 2023 onwards.

Coalition for Creativity (C4C)

The C4C gathers industry, civil society, consumer groups, and creators who have a shared vision of a modernised copyright regime in Europe. Since its founding in 2012, EuroISPA has played a leading role in the coalition’s work and continues to do so, with a particular focus on issues concerning piracy and copyright enforcement.
Data Protection

In 2022, the Data Protection Committee focused its efforts on constructively engaging with policymakers on the proposal for an ePrivacy Regulation, while keeping a close eye on the future frameworks for international transfers of data, and particularly on the EU-US efforts to transition from the Privacy Shield framework. These topics are crucial for EuroISPA’s members, especially for European small and medium-sized Enterprises, that would benefit from strong and clear rules around data transfers.

Moving ahead, EuroISPA will continue advocating for a robust legal framework that ensures trust and innovation while safeguarding our network users’ privacy and data protection. With that in mind, EuroISPA will continue working with EU and US policymakers and national data protection authorities to secure a new transatlantic agreement that can ensure trust in ever-advancing Internet-based services. Furthermore, our Association will make sure to support negotiators on any steps needed to establish a consistent ePrivacy framework that is workable for our members and aligned with existing EU legislation. We will also keep an eye on developments linked to the enforcement of GDPR, encouraging further harmonisation that will facilitate cooperation and enforcement, also on a cross-border basis.

Finally, EuroISPA will actively engage in the never-ending flow of data protection rules that are crucial for shaping the future architecture of services such as cloud computing and Artificial Intelligence, and do so in a way that promotes innovation within the Internet industry, at all levels.

Collaborations & Network: European Internet Forum (EIF)

The EIF is a platform led by Members of the European Parliament (MEPs) which allows for discussions on digital files between MEPs, industry representatives, and NGOs. It also enables high-level discussions on the political direction of digital legislation and fosters a greater understanding of the impact of technological development. The EIF is an important platform for EuroISPA, offering the opportunity to have fruitful exchanges with stakeholders, gain insight into central digital files, and voice the European Internet industry’s concerns and policy suggestions, and copyright enforcement.
Market and Services

During 2022, EuroISPA’s Market and Services Committee continued overseeing matters regarding accessibility requirements while following the discussions on the Digital Markets Act. Our members also discussed the consequences for our sector of Russia’s aggression against Ukraine, exchanging on best practices when it comes to potential disruptions of the Internet and telecoms infrastructure. They further debated the technical aspects that concern the EU-wide prohibitions for operators to broadcast, enable, facilitate, or contribute to broadcast content by specific entities, to make sure they are aligned with existing case law and fundamental rights.

In 2023, we expect the focus of the Committee to move towards broader connectivity issues, particularly in light of the European Commission’s Connectivity package, that includes a proposal for a Gigabit infrastructure act and an exploratory consultation on the future of the connectivity sector and its infrastructure. EuroISPA will aim to provide its members with a forum to hold an open debate about these topics, including the controversial issue of the compensation for the use of networks.

Collaborations & Network:
Internet Corporation for Assigned Names and Numbers (ICANN)

ICANN is a not-for-profit public benefit corporation with participants from all over the world dedicated to keeping the Internet secure, stable and interoperable. It promotes competition and develops policy on the Internet’s unique identifiers. Through its coordination role of the Internet’s naming system, it has an important impact on the expansion and evolution of the Internet.
25 years of EuroISPA

EuroISPA’s beginnings

“EuroISPA was approved as a reliable and very knowledgeable partner concerning all Internet matters but specifically in technical matters. During the past 25 years the Internet moved from a technical vision to a much more society-oriented medium and EuroISPA was always able to represent all views of the Internet we have today.”

Michael Rotert
Honorary Spokesperson of EuroISPA

1997
EuroISPA is Founded

2000
E-commerce Directive
The foundational legal framework for online services in the EU was EuroISPA’s one goal to guarantee a mere conduit status for ISPs, ensuring until today that ISPs are not made liable for other people’s content.
2006
Data Retention Directive
EuroISPA engaged intensely with the European institutions and raised its concerns regarding the Data Retention Directive, representing the members’ needs and sharing industry expertise on data preservation and mandatory data retention.

2011
Data protection & GDPR
EuroISPA engaged intensively throughout the process of developing the General Data Protection Regulation (GDPR) to ensure users have trust and confidence in online services, while ISPs can continue innovating and contributing to the European economy.

2018
Law Enforcement
EuroISPA has been a longstanding interlocutor on how to improve cooperation procedures between authorities and industry, using its representative role at Europol’s EC3 communications providers advisory group, the European Commission’s DG JUST/DG HOME taskforce on E-Evidence, and the EC’s expert group on data retention.

2005

2008

2010

2015
Copyright Directive
Its reform is a key part of the completion of the Digital Single Market that relies on the reform of the European online content framework in the broader area of content portability, audiovisual and VoD, rights management, levies and geoblocking. EuroISPA continues following its implementation at the national level.

2020

2021
2021

Digital Services Act

EuroISPA organised a series of online panel discussions to explore the main aspects of the DSA with policy experts and published a position paper on the topic. EuroISPA also had numerous exchanges with politicians, the European Commission, EU Council, and other stakeholders.

Present

EuroISPA will continue its work on the proposed CSAM Regulation to ensure the protection of European children online is upheld. Another key focus area will be the active engagement with EU policymakers on the topic of piracy of online content, in view of the upcoming publication of the European Commission’s recommendation in mid-2023.

Our Partners

Throughout these 25 years EuroISPA has signed Memoranda of Understanding with the following organisations to formalise and deepen cooperation and mutual understanding:

- Asia & Pacific Internet Association (APIA)
- Indonesian Internet Service Provider Association (APJII)
- Council of European National Top Level Domain Registries (CENTR)
- Latin America and Caribbean Federation for Internet and Electronic Commerce (ECOMLAC)
- Hong Kong Internet Service Providers Association (HKISPA)
- The Association of Internet Hotline Providers in Europe (INHOPE)
- Telecom Services Association Japan (TELESA)
- Internet Service Providers Association South Africa (ISPA SA)
- United States Internet Service Provider Association (US ISPA)

EuroISPA’s future

“In its 25 years of activity, EuroISPA has grown immensely both in membership and in scope, to become the world’s largest association of Internet Services Providers. The milestones of the past two decades make us proud, and give us the right impulse to strive for even bigger goals in the years to come.

Now it’s time for EuroISPA to rely on this long-standing expertise in the sector to shape the future of the internet in the interest of European ISPs and all stakeholders of the ever-changing telecommunications market.”

Elina Ussa
Board member
Our Association

EuroISPA’s activities are led by its members, representing the interests of Internet services providers (ISPs) across Europe. The Board, composed of at least a President, a Vice-President, and a Treasurer, is in charge of the overarching governance and continued functioning of the Association and its Officers are elected every two years by the Council. The Association’s activities are supported by the Secretariat, based in Brussels.

Members

Council

EuroISPA is governed by and for its members, through its Council. EuroISPA’s Council comprises 10 ISP associations, each appointing a member, representing more than 3,300 ISPs from EU and EFTA Member States.

This body meets four times a year to formally discuss policy issues, matters of importance to the European Internet industry, and the administration of the Association. However, more regular discussions between the members ensure that EuroISPA is a close-knit organisation, taking advantage of the expertise and experience contained therein all-year round.

Council members work in Committees and nominate and elect the Officers.

Hotlines

Several of EuroISPA’s national member associations also have hotlines or content-sIGNALLING platforms as part of their membership, or even run their own hotlines.

These hotline services play a crucial role in tackling illegal content online, including child sexual abuse material.

Observers

Organisations established in countries which are members of the Council of Europe are also welcome to EuroISPA’s membership, as Observers. While these associations do not vote on EuroISPA’s decisions, they participate regularly in the Committee Meetings and General Meetings, provide precious input on policy discussions, and have access to all the information the Council and Forum receive. Their perspective is extremely valuable as it broadens EuroISPA’s understanding of ICT policy beyond the EU.

Industry Forum

The EuroISPA Industry Forum is a structure which allows individual companies with a legitimate interest in the Internet industry to participate in EuroISPA’s activities, discussions, and working groups. The Forum joins Committee meetings to discuss policy issues and provide technical expertise and insight where needed. The Industry Forum acts in a purely advisory capacity to the Council.
Council members
January

- DSA in Focus Event 6 – “The trilogues and the future of content moderation”
- Seminar on national security regulations in Italy and their effect on the ISP market, hosted by member Andrea Monti (AIIP)

February

- Committee meetings: Cybersecurity and Intermediary Liability

March

- Introductory meeting with Freedom Internet
- General Meeting – Presentation of euCONSENT consortium
- Officers Meeting

April

- Organisation of presentation of the Data Act by the European Commission
- Webinar on the French Strategic Committee for the digital infrastructure sector, co-hosted with member FFTélécoms
- Committee meetings: Markets & Services, Innovation & Growth, Data Protection, and Cybersecurity

May

- Committee meetings: Safer Internet
June

- Workshop on the CSAM Regulation, co-organised with DG HOME
- Four CSAM Taskforce meetings to draft EuroISPA’s position on the CSAM Regulation
- Webinar on 5G deployment in Europe, co-hosted with member FiCom
- Officers meeting

July

- General Meeting – Guest speakers on the CSAM Regulation: Arda Gerkens (EOKM), Bastiaan Winkel (Dutch Ministry of Justice)

October

- EuroISPA meeting on transportation fee
- Officers meeting

November

- General Meeting – Guest speakers: incoming Swedish Presidency on the CSAM Regulation and European Commission (Copyright Unit) on piracy of live content
- Webinar on topDNS, hosted by member eco
- General Meeting – Guest speakers: Major Pekka Jokinen (Finnish Defence Forces) on cybersecurity impact of Finland’s accession to NATO, Laura Eiro (Ministry’s Director General of the Data Department) on Finland’s digital compass and the Digital Economy and Society Index (DESI), Bijal Sanghani (Managing Director at Euro-IX) on the IXP market
- Officers meeting
Secretariat

Andrea D’Incecco
Head of Policy

Isabelle De Vinck
Head of Secretariat

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