

CISPE Sovereign Cloud Manifesto

July 2025



This manifesto has been created by the CISPE Sovereign Cloud Committee to outline CISPE's position on what's necessary to secure and maintain viable choices for European customers as they move to the cloud. Europe's digital sovereignty, its capacity to offer alternatives to overseas 'hyperscale' cloud providers, depends on all parties committing to concrete and timely action. The CISPE Sovereign Cloud Manifesto covers five thematic areas and includes 20 specific actions for the industry, its customers, regulators and wider stakeholders.

By embracing this manifesto, the EU can reclaim control of its digital infrastructure and build a secure, sovereign future that serves its citizens, protects its values, and drives global innovation on European terms.

Importantly, this manifesto is not about excluding any providers or promoting protectionist measures that would reduce choice for customers. The recommendations are market-driven and do not advocate for the creation of new, complex governance structures or top-down approaches which have historically failed.

Overall, we seek to leverage the diversity of the European cloud ecosystem to ensure that sovereignty and strategic autonomy are achieved not through isolation but through increased choice, flexibility, and innovation within the market.

Five Key Themes for a Sovereign European Cloud Infrastructure

1. Reform EU Procurement Rules to Support European Cloud Providers for public spending to contribute to Europe's digital sovereignty and strategic resilience.

2. Promote Visibility and Recognition of Certified Sovereign Cloud Solutions to enhance the accessibility and trustworthiness of European alternatives.

3. Build Composable, Secure, and Fair European Cloud Ecosystems to foster competition, scale, and technological independence.

4. Promote a Sustainable and Scalable Cloud Sector to align Europe's cloud infrastructure growth with the EU Clean Industrial Deal.

5. Use-it-or-Share-it: Ensure Fair and Strategic Allocation of Energy Resources to prevent energy-based exclusion and prioritize the deployment of competitive European cloud capacity alternatives.

1. Reform EU Procurement Rules to Support European Cloud Providers

for public spending to contribute to Europe's digital sovereignty and strategic resilience.

- **Mandate justification for non-EU procurement**

Public administrations must provide detailed technical justification when selecting non-European providers. These justifications must prove that no equivalent European solution exists, or that such solutions do not meet core operational needs. The European Commission should audit and publish these justifications to monitor systemic dependencies and shape mitigation plans.

- **Accept functional adequacy, not feature parity**

Shift procurement rules away from rigid feature-comparison requirements. Instead, focus on solutions that meet core operational needs, enabling smooth transitions to sovereign European alternatives.

- **Launch Sovereign Cloud Credits**

Create a system of redeemable credits for European cloud services, specifically targeting startups, SMEs, and researchers. These credits would mirror those offered by hyperscalers to onboard customers to their clouds. A similar system, offering credits to those using European clouds, would stimulate consistent demand for sovereign infrastructure.

- **Audit foreign vendor lock-in contracts**

Conduct and publish a European-wide audit of legacy public sector contracts with foreign hyperscalers and develop transition roadmaps toward sovereign or federated alternatives. Ensure that public administrations are not locked in a digital ecosystem through contractual or technological barriers.

- **Map foreign procurement protectionism**

Commission a benchmarking study on non-EU procurement policies to counter false claims that EU-first procurement rules violate trade norms and ensure reciprocity in strategic sectors.

2. Promote Visibility and Recognition of Certified Sovereign Cloud Solutions

to enhance the accessibility and trustworthiness of European alternatives.

- **Define and certify sovereign services**
Develop a legal and operational definition of “sovereign” providers, requiring full control under EU jurisdiction.
- **Fund compliance certification for SMEs**
Allocate public support to help small European providers obtain costly compliance certifications (e.g., GDPR, ISO, NIS2), levelling the field with larger actors.
- **Require visibility by default in public tenders**
Ensure that EU-certified sovereign solutions are explicitly considered in every public procurement process.
- **Run coordinated visibility campaigns**
Promote verified European providers through EU-wide campaigns, leveraging catalogues such as the CISPE clearinghouse to spotlight their capacity for mission-critical workloads.

3. Build Composable, Secure, and Fair European Cloud Ecosystems to foster competition, scale, and technological independence.

- **Support federated cloud initiatives**

Scale initiatives like Fulcrum and SECA API to enable European providers to pool and federate capabilities across borders while maintaining autonomy and compliance.

- **Streamline cross-border infrastructure deployment**

Simplify permitting for pan-European infrastructure and prioritize multi-provider, multi-country collaborations.

- **Designate Cloud services under the DMA**

to monitor and proscribe anti-competitive behaviours.

- **Ban anti-competitive bundling of AI and other cloud services**

Prohibit forced bundling of proprietary AI tools and software suites with cloud infrastructures. The Commission should issue enforceable guidance to uphold composability and open technical standards.

- **Prioritize funding for inference infrastructure**

Allocate at least one-third of EU AI infrastructure funding to inference-oriented, distributed deployments—including edge computing—where most real-world AI applications will reside by 2030.

4. Promote a Sustainable and Scalable Cloud Sector to align Europe's cloud infrastructure growth with the EU Clean Industrial Deal.

- **Tie EU funding to the sustainability of the cloud infrastructures**

Make access to cloud infrastructure subsidies conditional upon alignment with future-proof environmental standards like those developed by the Climate Neutral Data Centre Pact: energy efficiency (PUE), renewable energy integration (REF), and water conservation (WUE). These measures and metrics should be standardised, verifiable and open to public scrutiny to avoid unfounded claims on climate neutrality.

- **Incentivize accelerated hardware refresh cycles with clear sustainability gains**

Provide funding mechanisms for hardware upgrades that improve compute efficiency without increasing power or land use. Funding should require sufficient guarantees that old equipment will be reused, recycled, or refurbished.

- **Focus on useful work capacity**

Emphasize metrics that reflect data centres, cloud, and IT service providers ability to deliver useful compute and storage capacity. These metrics should account for the diversity of IT technologies in use, be measurable across the industry, promote efficient use of infrastructure, and support ongoing technical innovation.

5. Use-it-or-Share-it: Ensure Fair and Strategic Allocation of Energy Resources

to prevent energy-based exclusion and prioritize the deployment of competitive European cloud capacity alternatives.

- **Curb Energy Hoarding by Dominant Providers**

Adopt a “use-it-or-share-it” rule to ban speculative reservations. Reserved energy allocations above 100 MW for data centre or AI infrastructure projects must be made public and deployed within 12–18 months. Unused allocations must be partially released after 18 months.

- **Prioritise European Projects**

Guarantee a European energy reserve share. Require that up to 25% of national reserved energy capacity for digital infrastructure be prioritized for allocation to European-owned providers, in particular for federated, SME-driven, and sovereign cloud alternatives.

- **Enhance Transparency and Oversight**

Create a public energy reservation registry. Require Member States and TSOs to publish real-time dashboards showing energy reservations above 100 MW, usage rates, and regional distribution per provider.

- **Conduct an annual EU audit**

The Commission should analyse national public energy reservation registries and publish an annual review of energy reservation and consumption trends, flagging potential hoarding and recommending corrective actions.

About CISPE Sovereign Cloud Committee

The **CISPE Sovereign Cloud Committee** is a new policy and industry body established to guide and oversee initiatives that reinforce Europe's digital independence. Its mission is to shape and accelerate regulatory and market reforms that empower European cloud service providers (CSPs) and public institutions to adopt secure, sovereign, and federated digital infrastructure built entirely under EU jurisdiction.

The Committee has been established to provide expert oversight and strategic direction on key issues related to sovereignty, security, competitiveness, and customer choice. It will drive CISPE's engagement with European institutions and public stakeholders on matters including public procurement, fair energy access, standards for composable federated cloud, and certification of sovereign providers.

Initial membership and companies endorsing CISPE manifesto include leading European CSPs such as: Leaseweb (Netherlands), Anexia (Austria), Aruba and Opiquad (Italy), Outscale/Dassault and NumSpot (France), Infomaniak (Switzerland), Jotelulu (Spain), and Genesis (Germany).

The Committee's independence is structurally guaranteed: under CISPE's bylaws, participation is restricted to European-controlled companies meeting standards equivalent to EUCS or SecNumCloud. Non-European hyperscalers are barred from participating, influencing, or accessing any outputs, decisions, or publications of the Committee.

The Cloud and AI Development Act (CAIDA) is a forthcoming EU legislative proposal intended to strengthen Europe's digital infrastructure, reduce reliance on foreign technologies, and create the regulatory foundations for sovereign, secure, and sustainable AI and cloud ecosystems. CAIDA is expected to include measures on funding, permitting, procurement, energy access, and standard-setting, and will be instrumental in defining how Europe builds a digital future rooted in open markets, resilience, and strategic autonomy.

The CISPE Sovereignty Committee will act as a key stakeholder and contributor to the success of CAIDA by promoting actionable, bottom-up reforms aligned with its objectives.

About CISPE

CISPE is the most representative, respected and relevant association for cloud service providers in Europe. Working for the benefit of cloud vendors and users, CISPE gives a voice to all players from local SMEs to global hyperscale cloud providers. It has proven itself a valuable partner to European institutions through insight and the development of practical tools, frameworks, codes of conduct and guides that help implement EU policy. CISPE is a founding member of Gaia-x.

CISPE is governed by an exclusively European board that enshrines the power of smaller players whilst understanding the reality of federated, distributed, and multi-cloud approaches.

