# i2Coalition Digital Policy Manifesto for the 2024 European Elections

## About the i2Coalition

The Internet Infrastructure Coalition (i2Coalition) is the **voice for worldwide businesses that build the Internet**, including cloud and data center providers, domain registrars, registries, and other foundational Internet enterprises. Established in 2012, our coalition actively engages in policy dialogues to **advocate for sensible digital policies**, uphold industry standards, and promote best practices.

Our undertakings include the **VPN Trust Initiative** for standardizing VPN provider operations and the **Ethical Web Data Collection Initiative** to set industry benchmarks. In navigating realms of encryption, cybersecurity, Internet governance, trade policies, open Internet principles, intermediary liability, and cross-border data flows, we are dedicated to fostering a **secure, accessible, and forward-thinking Internet infrastructure**. Engaging with policymakers, we provide expertise to shape policies aligned with a digital economy characterized by inclusivity, trust, and global interoperability.

### Building tomorrow: Advancing Europe's Internet infrastructure for the next decade

In the digital age, **Internet infrastructures are the backbone of our modern economy**, enabling the transformative innovations that drive our interconnected world. The i2Coalition **actively engages with EU policymakers and key stakeholders** to foster deep insights and proactive dialogue. **These conversations have enriched our perspective and led to the reflections and proposals contained in this Manifesto**.

The major policy areas that underpin our coalition—digital trade and Internet governance, privacy, encryption, cybersecurity, access to data, and intermediary liability—also form the **cornerstones of a resilient and inclusive digital future**. Through this manifesto, we seek to highlight our values in these areas in policy recommendations to ensure that **Europe's digital landscape thrives**, innovates, and remains protected from threats that could compromise its potential.

# Promoting an open and inclusive Internet

The i2Coalition recognizes the pivotal role of Internet infrastructure in enabling equal and global access to goods, information, and services. Echoing the vision outlined in the [Digital Decade Programme 2030](#), we firmly believe that "**digital infrastructure should aim at providing equal access to everyone, everywhere**." This is a crucial element to uphold the intrinsic nature of the Internet. In line with this ethos, the i2Coalition is dedicated to fostering bilateral cooperation between the **EU and the US regarding data flows** and actively supports the promotion of the **European Digital Single Market**.

### 1. Maintain the free flow of data

Prioritize cross-border data exchange to foster a globally connected digital environment to promote innovation and accessibility, benefiting businesses and consumers worldwide.

### 2. Uphold privacy and security standards

Emphasize strong user privacy and ensure responsible, transparent, and secure handling in accordance with global standards and laws.

### 3. Promote digital inclusion and accessibility

Focus on universal Internet access and reducing the digital divide. Aim for digital tools and services that are accessible to all, regardless of location or background.

# Internet Governance Roadmap: Collaboration, Representation, and Inclusion

The i2Coalition strongly supports a multi-stakeholder approach to Internet governance, recognizing its critical role in ensuring **democratic, transparent, and effective management of the Internet**. This position resonates with the values of both the EU and the global Internet community. This approach—which emphasizes inclusive and collaborative decision-making among different stakeholders such as governments, the private sector, civil society, and technical communities—is critical to **fostering innovation, protecting users' rights, and preserving the open nature of the Internet**. As evidence of our commitment, the **i2Coalition recently [organized a workshop](#) with the European Commission** that helped us draft the following guiding principles for EU policymakers in the next mandate.

### 1. Address Internet fragmentation

Actively address the challenges and potential risks of Internet fragmentation. Advocate for the preservation of the technical infrastructure and explore cooperative solutions to

harmonize different legal standards across jurisdictions, particularly in dealing with content-layer issues.

### 2. Ensure open access and neutrality

Work to maintain an open and neutral Internet. This principle includes opposing undue censorship, promoting fair access to digital resources, and ensuring that the Internet remains a platform for free expression and innovation without favoring particular content or services.

### 3. Collaborate on global standards

Actively participate in the development of global Internet governance standards, balancing regional and global needs to ensure interoperability and consistency. This cooperation will benefit the EU and industry by promoting international trade, streamlining regulatory compliance, and fostering innovation.

### 4. Uphold transparency and accountability

Commit to maintaining high standards of transparency and accountability in Internet governance. This includes clear and open communication about policy changes, decision-making processes, and the rationale behind certain actions to ensure stakeholders understand and trust the governance mechanisms.

# Balancing safety and privacy with strong encryption

The i2Coalition is committed to a secure and open Internet and supports **robust encryption as a cornerstone of trust, privacy, and security online**. Particularly in light of the proposed EU CSA regulation, the i2Coalition **emphasizes** the role of encryption in both combating child sexual abuse material (CSAM) online and **protecting the digital rights of individuals and businesses**. Our recommendations for EU policymakers:

### 1. Promote trust

Promote encryption to build trust in online interactions and legal processes by ensuring the confidentiality and integrity of digital communications and transactions.

### 2. Oppose backdoors

Oppose initiatives that require backdoor access to encrypted data, which inherently weaken encryption and potentially expose users to malicious actors.

### 3. Foster multi-stakeholder engagement

Promote greater transparency and global collaboration among technology companies, governments, and civil society to address broader Internet security issues while maintaining robust encryption standards.

**4. Combat abuse**

Support both the lawful pursuit of illegal online activities and the defense of privacy and security rights without compromising encryption integrity.

# Addressing copyright challenges together

Copyright protection and the fight against online piracy are top priorities for creators and Internet intermediaries. **Members of the i2Coalition are actively working with rights-holders to navigate these waters**. Among the proposed solutions, IP and DNS blocking are frequently proposed but often go too far and inadvertently impede the freedoms they seek to protect. Thus, it is important to calibrate a nuanced balance: one that preserves copyright enforcement and **reduces piracy without imposing undue burdens or undermining transparency and accountability**. In anticipation of the Commission's recent Recommendation on piracy of live content, the **i2Coalition engaged with policymakers** to explore alternative strategies. Below is our recommendation for any upcoming discussions.

**1. Protect human rights and avoid overblocking**

When setting rules for online services, it's essential to ensure people's fundamental rights are protected on the Internet. This includes integrating fair use principles to safeguard the freedom of expression and access to information. Care must be taken to ensure that enforcement actions avoid the excessive blocking of legitimate content.

**2. Ensure fair legal proceedings through due process**

Ensure that access by law enforcement to customer information of Internet infrastructure providers follows due process of law. This will ensure that the legal rights of both individuals and intermediary service providers are protected and that unwarranted intrusions are prevented.

**3. Promote transparency**

Require online platforms and government agencies to disclose the criteria and processes used for content moderation, takedowns, and data access requests. This transparency will build trust and provide greater understanding for consumers.

**4. Support a proportionate approach to enforcement**

Support a principle of proportionality in copyright enforcement, advocating that rights-holders first target the service closest to the content for takedown to **ensure that broader, more indiscriminate measures such as blocking are considered only as a last resort.**

The i2Coalition (Internet Infrastructure Coalition) ensures that those who build the infrastructure of the Internet have a voice in public policy. We are the leading voice for web hosting companies, data centers, domain registrars and registries, cloud infrastructure providers, managed services providers, and related tech. We protect innovation and the continued growth of the Internet's infrastructure, which are essential to the global economy.