EU Open Digital Ecosystems Consultation Analysis

Domain: vendor-lock - Complete Analysis

Documented Insights Analysis System

February 2026

Contents

EU Open Digital Ecosystems Consultation

Vendor Lock-in

Analysis date 08 February 2026
Domain scope Switching costs, technological dependencies, and competitive barriers
Commission context Competition policy, market contestability, interoperability requirements

Executive Summary

This domain received substantial engagement across the consultation, with 667 responses (40.2% of corpus) addressing related themes. Respondents from 40 countries and 10 stakeholder types contributed, indicating broad interest across the EU.

Market Sentiment Overview

Coverage and Engagement

Metric	Value
Matching responses	667
Coverage of corpus	40.2%
Countries represented	40
Stakeholder types	10

Metric	Value
Organisations	233
Responses with attachments	112

Stakeholder Positions

The consultation response was dominated by EU Citizens (61.9%), followed by Companys (20.7%). This distribution suggests strong grassroots interest rather than primarily industry-driven advocacy.

Stakeholder Type	Responses	Countries	Percentage
EU Citizen	413	29	61.9%
Company	138	20	20.7%
NGO	41	14	6.1%
Academic Research Instittution	18	9	2.7%
Non EU Citizen	18	14	2.7%
Other	15	10	2.2%
Business Association	13	8	1.9%
Public Authority	9	6	1.3%
Trade Union	1	1	0.1%
Consumer Organisation	1	1	0.1%

Geographic Distribution

Geographic engagement shows concentration in Germany (22.5%), with notable participation from France and Italy. The distribution across 40 countries indicates EU-wide relevance rather than localised concern.

Country	Responses	Percentage
Germany	150	22.5%
France	79	11.8%
Italy	77	11.5%
Netherlands	69	10.3%
Belgium	38	5.7%
Poland	31	4.6%
Austria	28	4.2%
Spain	26	3.9%
Portugal	20	3.0%
Sweden	19	2.8%
United Kingdom	15	2.2%
DNK	15	2.2%
United States	14	2.1%
Romania	13	1.9%
Finland	11	1.6%

Term Usage Patterns

Analysis of term concentration reveals how strongly specific concepts feature in responses compared to the broader consultation corpus. A strength score above 1.5 indicates the term appears more frequently in this domain than in general discussion.

switching (strength: 2.4) Moderately concentrated in this domain

Positive framing – Used with: support, benefit, advantage

Critical framing – Discussed alongside: barriers, barrier, lack

portability (strength: 2.0) Moderately concentrated in this domain

Positive framing – Used with: support, enable, enables

Critical framing – Discussed alongside: barriers, lack, barrier

lock-in (strength: 1.9) Moderately concentrated in this domain

Positive framing – Used with: support, supporting, benefits

Critical framing – Discussed alongside: barriers, lack, limited

migration (strength: 1.8) Moderately concentrated in this domain

Positive framing – Used with: support, enable, benefits

Critical framing – Discussed alongside: lack, limited, barriers

interoperability (strength: 1.7) Moderately concentrated in this domain

Positive framing – Used with: support, supporting, strengthen

Critical framing – Discussed alongside: barriers, lack, limited

Sentiment and Advocacy Patterns

Language analysis reveals the tone and advocacy intensity of responses addressing this domain.

Language Pattern	Percentage of Responses
Action-oriented language	41.4%
Problem-focused language	37.5%
Solution-focused language	45.9%

Strong advocacy for specific actions – Advocacy level: High

Related Themes and Context

Terms that frequently co-occur with domain concepts reveal the broader context in which respondents frame this policy area.

Co-occurring Term	Occurrences	Documents	Document %
open	593	593	88.9%
source	526	526	78.9%
software	511	511	76.6%
public	412	412	61.8%
digital	390	390	58.5%
european	358	358	53.7%
support	340	340	51.0%
proprietary	334	334	50.1%
sovereignty	322	322	48.3%
infrastructure	305	305	45.7%

Co-occurring Term	Occurrences	Documents	Document %
security	300	300	45.0%
open-source	300	300	45.0%
solutions	295	295	44.2%
data	289	289	43.3%
lock-in	282	282	42.3%
projects	279	279	41.8%
companies	266	266	39.9%
development	250	250	37.5%
code	248	248	37.2%
vendor	247	247	37.0%

Sub-theme Distribution

Responses addressing this domain cluster around distinct sub-themes, revealing specific areas of concern or opportunity. Note that responses may address multiple sub-themes.

Sub-theme	Responses	Percentage
Portability	285	42.7%
Proprietary	93	13.9%
Dependency	6	0.9%
Costs	1	0.1%
Barriers	0	0.0%

Policy Considerations

Market Structure Signals

- Strong grassroots engagement suggests public concern extends beyond industry advocacy

Advocacy Intensity

- High action-oriented language indicates stakeholders expect policy intervention

Geographic Considerations

- Broad geographic engagement suggests EU-level relevance

Methodology

This analysis examines consultation responses through domain-specific keyword and keyphrase matching. Coverage statistics indicate the proportion of responses addressing the domain. Term usage strength compares domain-specific frequency to corpus-wide frequency. Sentiment analysis identifies language patterns without attributing positions to individual respondents.

Search parameters 33 terms (7 keywords, 26 keyphrases)
Analysis date 08 February 2026

LLM Position Analysis - Vendor-lock

Generated: Sun Feb 8 20:19:06 2026

Stakeholder Positions

LLM Processing Status: 1133 responses analysed across all domains (68.3% complete, 477 remaining). **This domain**: 95 responses. Results are partial and will update as processing continues.

Analysis of positions extracted through LLM analysis of consultation responses. Extracted 230 positions across 43 categories.

Position Overview

Position Category	Support	Oppose	Neutral/Mixed	Total
Public Funding	58	3	1	62
Procurement Preference	59	1	1	61
Vendor Lock	3	19	1	23
Digital Services Tax	19	4	0	23
Vendor Lock Avoidance	8	1	0	9
State Aid	6	0	0	6
Vendor Lock In	0	3	0	3
Tax Incentive	1	1	0	2
Vendor Lock In Commercial Products	1	1	0	2
Open Source Software	2	0	0	2
Open Standards	1	0	1	2
Open Source Preference	2	0	0	2
Vendor Lock Monopoly	0	2	0	2
Vendor Lock Prohibition	0	2	0	2
Vendor Lock Eu Based	1	0	0	1
Vendor Lock Infrastructure Diversity	1	0	0	1
Vendor Lock Industrialization	0	1	0	1
Public Funding Eu Open Source	1	0	0	1
Reduced Electronic Waste	1	0	0	1
Open Source Business Model	1	0	0	1
Vendor Lock Regulatory Framework	0	1	0	1
Proprietary Software Allowed	0	1	0	1
Vendor Lock Innovation	0	1	0	1
Vendor Lock Investment	0	1	0	1
Interoperability Requirement	1	0	0	1
Open Source Advocacy	1	0	0	1
Open Core Model	0	1	0	1
Open Source Preferred	1	0	0	1
Vendor Lock Mitigation	0	0	1	1
Vendor Lock Neutral	0	0	1	1
Reinventing Wheel	0	1	0	1
Vendor Lock Business Model	0	0	1	1
Vendor Lock Us Based	0	1	0	1
Healthy Competition	1	0	0	1
Vendor Lock In Commercial Products Eu Alternatives	1	0	0	1
Vendor Lock Regulations	0	1	0	1
Vendor Lock Removal	0	1	0	1
Open Source Alternative	1	0	0	1
Vendor Lock Reduction	1	0	0	1
Vendor Lock Global Open Source	1	0	0	1

Position Category	Support	Oppose	Neutral/Mixed	Total
Hardware Support	1	0	0	1
Vendor Lock Restrictions	0	1	0	1
Patent Reform	0	1	0	1

Detailed Position Analysis

Public Funding

Total responses 62 positions extracted across 3 distinct responses
Support position 58 responses (93.5%), 32.8% express strong advocacy
Primary stakeholders (support) EU Citizens (46), Companies (5), NGOs (3)
Core arguments (support) The EC should support a transition to EU-based open source solutions, requiring building teams of excellence and acquiring critical mass.; The EU should invest in an Open Internet Stack, a state-of-the-art technology stack available to all citizens for free.
Opposition position 3 responses (4.8%), 33.3% express strong opposition
Core arguments (oppose) EU's approach to funding OSS is inefficient and ineffective.; Investment alone is not enough to bridge the gap in core digital technologies.
Specific proposals mentioned 100.000 k per person for 12 months to implement open-source software (1 mentions); a publicly-hosted, high quality code platform (1 mentions); Create a fund for FOSS projects (1 mentions)
Evidence cited citation not provided (2); crazy people in open source community (1); Redhat example (1); Google and FFMPEG example (1); Nachhaltige Beiträge scheitern oft an Compliance-Prozessen, fehlenden Strukturen und zu wenig Finanzierung für Maintenance. (1)

Procurement Preference

Total responses 61 positions extracted across 3 distinct responses
Support position 59 responses (96.7%), 47.5% express strong advocacy
Primary stakeholders (support) EU Citizens (47), Companies (5), NGOs (3)
Core arguments (support) Open-source software products need equal market participation opportunities, which requires legislative context. Vendors must provide APIs to enable same functionalities.; The use of open-source software is necessary for security and sovereignty, allowing countries to diversify and avoid vendor lock-in.
Opposition position 1 responses (1.6%), 100.0% express strong opposition
Core arguments (oppose) EU's procurement policies favor proprietary vendors over OSS.
Specific proposals mentioned Ban the use of proprietary file formats (1 mentions); Impose the use of open-source software in all areas where proprietary products are used (1 mentions); Introdurre incentivi mirati per le aziende produttrici di software affinché rendano i loro prodotti compatibili con Linux (1 mentions)
Evidence cited Marktdominanz großer Software-Anbieter, Lock-in- und Netzwerkeffekte erschweren Alternativen. (1); citation not provided (1); https://element.io/en/matrix-in-germany (1); US datacenter dominant market (1); Astères 2025 (1)

Vendor Lock

Total responses 23 positions extracted across 3 distinct responses
Support position 3 responses (13.0%), 0.0% express strong advocacy
Primary stakeholders (support) EU Citizens (2), Companies (1)

Core arguments (support) The creation of the Illumos foundation in Switzerland provides an opportunity for EU-based solutions, and OmniCube is a system that leverages this opportunity.; Vendor-lock can be beneficial for EU independence and competitiveness, but requires a mix of Open Source and proprietary solutions.

Opposition position 19 responses (82.6%), 68.4% express strong opposition

Core arguments (oppose) The reliance on Microsoft and Google for 'Office productivity' is complicated because many products and services are bundled together and coupled together.; International standards authorities create barriers to open source adoption through high fees, proprietary licenses, and outdated processes.

Evidence cited ISO 26262 (1); 2024 Linux community submission to US sanctions (1); JEE (1); paesi extra-UE (1); Pebble watch example (1)

Digital Services Tax

Total responses 23 positions extracted across 2 distinct responses

Support position 19 responses (82.6%), 10.5% express strong advocacy

Primary stakeholders (support) EU Citizens (17), CONSUMER_ORGANISATION (1), NGOs (1)

Core arguments (support) Mandating open-source, verifiable boot and policy enforcement architecture to prevent exploitation of autonomous systems.; Limiting data collection and storage reduces risks of piracy for businesses and institutions.

Opposition position 4 responses (17.4%), 0.0% express strong opposition

Core arguments (oppose) EU should not tax proprietary vendors, as it would be unfair.; Microsoft products are a burden on bureaucracy cost, implying that proprietary vendors should not be taxed.

Specific proposals mentioned An open-source, verifiable boot and policy enforcement architecture should be mandated by EU. (1 mentions)

Vendor Lock Avoidance

Total responses 9 positions extracted across 2 distinct responses

Support position 8 responses (88.9%), 50.0% express strong advocacy

Primary stakeholders (support) Companies (5), EU Citizens (3)

Core arguments (support) Open-Source-Lösungen auf Infrastrukturebene bieten Hersteller- und Anbieterunabhängigkeit, wodurch Abhängigkeiten und Lock-in-Effekte vermieden werden.; EU open standards for Information Objects can free us from US dependence and put digital information in the hands of people.

Opposition position 1 responses (11.1%), 0.0% express strong opposition

Core arguments (oppose) The EU should not create artificial barriers, like high-level goals that are hard to fulfill.

Evidence cited DSGVO-Perspektive (2); BSI-Perspektive (1); Europa sollte nicht nur Nutzer digitaler Technologien sein, sondern deren Gestalter. (1); KRITIS-Perspektive (1); Open-Source-Lösungen ermöglichen Transparenz, Kontrolle und Nachhaltigkeit. (1)

State Aid

Total responses 6 positions extracted across 1 distinct responses

Support position 6 responses (100.0%), 33.3% express strong advocacy

Primary stakeholders (support) EU Citizens (5), NGOs (1)

Core arguments (support) Open source software needs extra guardrails over the security, but the fact that the code is open means it's more likely to be secure than closed counterparts.; The transition to open source requires building development communities and exchanging information, specifications, and code between member states.

Vendor Lock In

Total responses 3 positions extracted across 1 distinct responses
Opposition position 3 responses (100.0%), 66.7% express strong opposition
Core arguments (oppose) Google's tactics bind device manufacturers to their version of Android, making it difficult for users to install custom distributions.; Companies use strategies such as signing Contributor License Agreements to restrict the use of open source software.
Evidence cited [2] (2); [4] (1); [1] (1); [3] (1)