

# EU Open Digital Ecosystems Consultation Analysis

Domain: procurement - Complete Analysis

Documented Insights Analysis System

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## EU Open Digital Ecosystems Consultation

### Public Procurement

**Analysis date** 07 February 2026  
**Domain scope** Public sector procurement practices, barriers, and reform proposals  
**Commission context** EU procurement directives, transparency requirements, SME access

### Executive Summary

This domain received substantial engagement across the consultation, with 429 responses (25.9% of corpus) addressing related themes. Respondents from 37 countries and 9 stakeholder types contributed, indicating broad interest across the EU.

### Market Sentiment Overview

#### Coverage and Engagement

Metric	Value
Matching responses	429
Coverage of corpus	25.9%
Countries represented	37
Stakeholder types	9

Metric	Value
Organisations	185
Responses with attachments	102

### Stakeholder Positions

The consultation response was dominated by EU Citizens (52.9%), followed by Companys (25.4%). This distribution suggests strong grassroots interest rather than primarily industry-driven advocacy.

Stakeholder Type	Responses	Countries	Percentage
EU Citizen	227	25	52.9%
Company	109	20	25.4%
NGO	35	12	8.2%
Non EU Citizen	15	10	3.5%
Business Association	14	6	3.3%
Academic Research Institution	13	7	3.0%
Public Authority	8	5	1.9%
Other	7	7	1.6%
Environmental Organisation	1	1	0.2%

### Geographic Distribution

Geographic engagement shows concentration in Germany (22.4%), with notable participation from Netherlands and Italy. The distribution across 37 countries indicates EU-wide relevance rather than localised concern.

Country	Responses	Percentage
Germany	96	22.4%
Netherlands	52	12.1%
Italy	44	10.3%
France	40	9.3%
Belgium	31	7.2%
Austria	23	5.4%
Spain	21	4.9%
Poland	18	4.2%
Portugal	13	3.0%
United States	12	2.8%
United Kingdom	11	2.6%
Sweden	8	1.9%
Romania	7	1.6%
Finland	7	1.6%
GRC	6	1.4%

### 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.

**bidding (strength: 3.9)** Highly concentrated in this domain (appears 3x+ more than in general corpus)

Positive framing – Used with: enable, enabled, opportunity

Critical framing – Discussed alongside: difficult

**contract (strength: 3.2)** Highly concentrated in this domain (appears 3x+ more than in general corpus)

Positive framing – Used with: support, benefits, improve

Critical framing – Discussed alongside: fail, barriers, insufficient

**supplier (strength: 2.8)** Moderately concentrated in this domain

Positive framing – Used with: advantage, enables, support

Critical framing – Discussed alongside: barrier, black, barriers

**procurement (strength: 2.2)** Moderately concentrated in this domain

Positive framing – Used with: support, supporting, strengthen

Critical framing – Discussed alongside: barriers, lack, limited

**tender (strength: 2.1)** Moderately concentrated in this domain

Positive framing – Used with: support, advantages, supports

Critical framing – Discussed alongside: barriers, lack, barrier

## 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	46.6%
Problem-focused language	41.0%
Solution-focused language	52.2%

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	394	394	91.8%
source	353	353	82.3%
software	325	325	75.8%
public	315	315	73.4%
digital	294	294	68.5%
european	282	282	65.7%
vendor	271	271	63.2%
sovereignty	261	261	60.8%

Co-occurring Term	Occurrences	Documents	Document %
support	257	257	59.9%
infrastructure	240	240	55.9%
security	231	231	53.8%
lock-in	231	231	53.8%
open-source	220	220	51.3%
procurement	213	213	49.7%
solutions	212	212	49.4%
projects	204	204	47.6%
data	200	200	46.6%
funding	197	197	45.9%
critical	194	194	45.2%
maintenance	189	189	44.1%

## 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
Barriers	291	67.8%
Transparency	207	48.3%
Reform	49	11.4%
Process	29	6.8%
Sme Access	26	6.1%

## 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** 31 terms (8 keywords, 23 keyphrases)

**Analysis date** 07 February 2026

# LLM Position Analysis - Procurement

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## Stakeholder Positions

**LLM Processing Status:** 1129 responses analysed across all domains (68.1% complete, 481 remaining). **This domain:** 151 responses. Results are partial and will update as processing continues.

Analysis of positions extracted through LLM analysis of consultation responses. Extracted 396 positions across 18 categories.

## Position Overview

Position Category	Support	Oppose	Neutral/Mixed	Total
Procurement Preference	181	10	0	191
Public Funding	126	9	1	136
Digital Services Tax	34	7	0	41
State Aid	6	2	0	8
Tax Incentive	0	3	1	4
Vat Exemption	3	1	0	4
Corporate Influence	0	1	0	1
Market Integration	1	0	0	1
Non Eu Monopoly	0	1	0	1
Abuse Of Power	0	1	0	1
Vendor Lockin	0	1	0	1
Maintenance	1	0	0	1
Help With Certification	1	0	0	1
Responsible Disclosure	1	0	0	1
Extended Right To Repair	1	0	0	1
Market Structures	0	0	1	1
Funding	1	0	0	1
Copyleft License	1	0	0	1

## Detailed Position Analysis

### Procurement Preference

**Total responses** 191 positions extracted across 2 distinct responses

**Support position** 181 responses (94.8%), 59.1% express strong advocacy

**Primary stakeholders (support)** EU Citizens (106), Companies (37), NGOs (14)

**Core arguments (support)** The Public Product Organization model directly addresses many of the barriers identified by the Commission, providing a sustainable framework for public organizations and their vendors to collaboratively develop, maintain, and govern shared open-source solutions.; EU can play a crucial role in enabling municipalities to rely on interoperable, secure, and sustainable digital public infrastructure by creating an EU-wide procurement framework that favors open source.

**Opposition position** 10 responses (5.2%), 10.0% express strong opposition

**Core arguments (oppose)** Open source is crucial for control over technology, proprietary vendors work above the law.; American companies have control of the market of legacy software, which allows them to flood the market with additional products without fearing competition from European vendors.

**Specific proposals mentioned** Use public procurement as a tool (2 mentions); All public money should result in public code. (1 mentions); Cap passthrough fees (1 mentions)  
**Evidence cited** attached PDF (2); FSFE submission (2); France's SILL already provides a national model of recommended open-source software for public administration. (1); the chinese have HarmonyOS... (1); <https://openssf.org/blog/2025/09/23/open-infrastructure-is-not-free-a-joint-statement-on-sustainable-stewardship/> (1)

## Public Funding

**Total responses** 136 positions extracted across 3 distinct responses

**Support position** 126 responses (92.6%), 26.2% express strong advocacy

**Primary stakeholders (support)** EU Citizens (72), Companies (30), NON\_EU\_CITIZEN (7)

**Core arguments (support)** EU can play a crucial role in enabling municipalities to rely on interoperable, secure, and sustainable digital public infrastructure by establishing long-term, structural EU funding for open digital infrastructure.; Well designed financial support through grants, public procurement, and long term maintenance funding would allow European FOSS solutions to grow and become viable alternatives.

**Opposition position** 9 responses (6.6%), 0.0% express strong opposition

**Core arguments (oppose)** The use of proprietary software creates vendor lock-in, limiting the state's ability to migrate data or change providers without significant costs.; The financial allocation for ZenDiS is a joke compared to the annual license fees paid to non-EU companies.

**Specific proposals mentioned** Contracts with outside experts or contributors funded and designed based on regular pay for time worked at a rate appropriate to the software industry. (1 mentions); Direct funding for the maintenance and security of core open protocols like Matrix. (1 mentions); ecosystem diversity funding: support 35 platforms per use case to avoid winnertakesall (1 mentions)

**Evidence cited** see the GNOME project (2); EU-backed, open healthcare AI ecosystems could deliver immense public value by ensuring compliance with European law and supporting local data processing. (1); coreboot.org (1); France's SILL already provides a national model of recommended open-source software for public administration. (1); <https://responsibility-by-design.anvil.app> (1)

## Digital Services Tax

**Total responses** 41 positions extracted across 2 distinct responses

**Support position** 34 responses (82.9%), 2.9% express strong advocacy

**Primary stakeholders (support)** EU Citizens (17), Companies (6), ACADEMIC\_RESEARCH\_INSTITUTIONS (3)

**Core arguments (support)** Crucial for reaching these goals is coordination and legislation to enforce generic compatibility and interchangeability and to ban tool and vendor lock-in.; DIGITAL SME supports the boost of made-in-Europe solutions in AI, digital public infrastructure and all the critical tech layers that are key to attain tech sovereignty.

**Opposition position** 7 responses (17.1%), 0.0% express strong opposition

**Core arguments (oppose)** Taxing proprietary vendors is not a solution to data protection concerns.; Major commercial digital business players may use tactics like delayed support for OSS platforms to maintain market position.

**Evidence cited** US hostility towards EU (1); total cost of ownership is frequently underestimated (1); <https://openssf.org/blog/2025/09/23/open-infrastructure-is-not-free-a-joint-statement-on-sustainable-stewardship/> (1); 2. DATA AS INFRASTRUCTURE: Open Data has a massive impact on a lot of economic sectors (1); <https://op.europa.eu/en/publication->

## State Aid

**Total responses** 8 positions extracted across 2 distinct responses

**Support position** 6 responses (75.0%), 33.3% express strong advocacy

**Primary stakeholders (support)** EU Citizens (4), Companies (1), NON\_EU\_CITIZEN (1)

**Core arguments (support)** Well designed financial support through grants, public procurement, and long term maintenance funding would allow European FOSS solutions to grow and become viable alternatives.; The EU should use the Interoperable Europe Act to ensure that cybersecurity training in schools and universities is vendor-neutral and emphasizes FOSS tools.

**Opposition position** 2 responses (25.0%), 0.0% express strong opposition

**Core arguments (oppose)** Public subsidies for open source projects may not be effective due to governance and accountability issues.; Public subsidies for OSS projects are not mentioned as a solution to data protection concerns.

**Specific proposals mentioned** Dismantle Proprietary Lock-in (1 mentions); providing direct and sustainable financial support for European Free and Open Source Software applications (1 mentions)

## Tax Incentive

**Total responses** 4 positions extracted across 2 distinct responses

**Opposition position** 3 responses (75.0%), 0.0% express strong opposition

**Core arguments (oppose)** Proprietary providers process sensitive patient data, where on-premise, privacy-preserving alternatives should exist.; The EU should not provide tax incentives for proprietary vendors, but the text does not explicitly mention this.

## Vat Exemption

**Total responses** 4 positions extracted across 2 distinct responses

**Support position** 3 responses (75.0%), 0.0% express strong advocacy

**Primary stakeholders (support)** EU Citizens (2), NGOs (1)

**Core arguments (support)** The EU should exempt open-source vendors from VAT to promote their adoption.; Exempting VAT on Open Source adoption/development would help the foundation's budget.

**Opposition position** 1 responses (25.0%), 0.0% express strong opposition

**Core arguments (oppose)** VAT exemptions for open source adoption may not be necessary due to low or zero licensing costs.