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Open Letter to the European Institutions

Why Shouldn’t Democracy Thrive on Data Too?

Recognising Democratic Participation as a High-Value Dataset and Building a European Democracy Data Commons

To:

- The European Commission (DG CNECT, DG DIGIT, DG JUST, Secretariat-General)
- The European Parliament (Committees on ITRE, LIBE, AFCO)
- The Council of the European Union
- The European Data Protection Supervisor (EDPS)

Dear President, Commissioners, Members of the European Parliament, and Distinguished Representatives,

Corporations have built some of the most valuable companies in history on the data European citizens generate every day: every click, every scroll, every purchase, feeding a global advertising economy worth hundreds of billions of euros.

EUMANS puts a simple question to the European Union: ***why shouldn't democracy thrive on data too?*** Not by extracting it, but by inviting citizens to give it — voluntarily, transparently, and for a purpose they choose.

The Open Data Directive (Directive (EU) 2019/1024) already recognises that some public-sector data carries such potential for the common good that it deserves special status. Commission Implementing Regulation (EU) 2023/138 currently designates **six such "high-value dataset" categories** - **geospatial, earth observation and environment, meteorological, statistics, company ownership, and mobility** - which public bodies must publish free of charge, in machine-readable form, and through open APIs. Crucially, the Directive allows the Commission to **add new categories by delegated act as needs evolve**.

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The Commission has now scheduled exactly such an opportunity. Its Data Union Strategy, published on 19 November 2025, commits to a "Quality Data for AI" initiative that includes **expanding the list of high-value datasets under the Open Data Directive in the fourth quarter of 2026**. We ask that this expansion add a seventh category: **democratic participation**.

Deliberation logs from Citizens' Panels, participatory inputs submitted through Have Your Say, statements of support collected through European Citizens' Initiatives, and the outputs of local and national deliberative processes are, individually, already public.

Structured, interoperable and made genuinely reusable, they would become one of the most valuable datasets Europe holds — not for advertising, but for understanding how European democracy actually works, and for holding it accountable.

From a Category to a Commons

High-value datasets are the entry point, not the destination. The same Data Union Strategy is deploying and scaling **14 Common European Data Spaces**, spanning sectors from health and mobility to energy, agriculture, skills and cultural heritage — each a **federated, EU-supervised infrastructure for pooling and reusing data** too dispersed, or too sensitive, for any single actor to manage alone.

There is, at present, no data space for democracy. We ask the European Union to start building one: a **Democracy Data Space**, governed under the same principles of interoperability, security and EDPS supervision as its counterparts, designed specifically to store and share civic participation and democracy data as a public good, rather than a byproduct scattered across dozens of disconnected portals.

#MyDataForDemocracy: The Legal Tool Already Exists

Our ambition goes further still. Corporations have thrived on data generated far beyond any single high-value category — the data every European produces simply by using the internet, filtered, profiled and monetised by platforms with no stake in Europe's democratic health.

We believe citizens should have the option to redirect a share of that same data toward the opposite purpose: strengthening, rather than undermining, democratic life.

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The European Union does not need to invent this mechanism from scratch. The Data Governance Act (Regulation (EU) 2022/868) already establishes **"data altruism"** as a recognised legal category: the voluntary, unpaid sharing of personal or non-personal data for objectives of general interest.

The Act also names **public policy making** explicitly among those objectives, and it provides for registered "data altruism organisations," oversight through the European Data Innovation Board, and a common European data altruism consent form, designed to be modular and adaptable across sectors.

We ask the Union to put this existing framework to work for democracy. A **#MyDataForDemocracy campaign**, built on the Data Governance Act's own consent mechanism, would **let citizens opt in** — clearly, revocably, and without commercial reward — **to route data they already generate toward all European Data Spaces.**

This is simply the broader application of a donation model the Union has already validated for healthcare and research through the European Health Data Space's MyHealth@EU infrastructure, and the federated architecture of the European Open Science Cloud.

Building Digital Commons

None of this is compatible with surveillance, and we do not propose it as such. Like blood or organ donation, participation must be **opt-in, revocable at will, and free of any reward beyond the knowledge of contributing to the common good**.

Like the European Health Data Space, secondary use must run through accountable intermediaries and remain under EDPS supervision. And like the Open Data Directive's own high-value datasets, the resulting Democracy Data Commons must stay open to researchers, journalists, civil society and public administrations alike — never captured by any single institution, company, or government.

Leveraging Existing EU Initiatives

This proposal builds on and connects existing European efforts:

- **Open Data Directive (2019/1024) and the High-Value Datasets Implementing Regulation (2023/138)** – the existing legal mechanism, extendable by delegated act, for recognising democratic participation as a priority dataset.

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- **Data Union Strategy (19 November 2025)** – its "Quality Data for AI" initiative already schedules an expansion of high-value datasets for Q4 2026, the live window for this proposal.
- **The 14 Common European Data Spaces** – the federated architecture that the Democracy Data Space would join.
- **Data Governance Act (2022/868), Chapter IV** – the existing legal category of "data altruism," which already names public policy making among its objectives of general interest.
- **European Health Data Space / MyHealth@EU** – a working precedent for citizen-consented, cross-border, non-extractive data infrastructure.
- **European Open Science Cloud** – a working precedent for federated, EU-supervised research-data infrastructure.

A Call To Action

We urge the European Institutions to:

1. **Add democratic participation as a high-value dataset category**, through the Commission's own expansion of the Open Data Directive's high-value datasets list.
2. **Establish a Democracy Data Space** among the Common European Data Spaces, federated and under EDPS supervision.
3. **Launch #MyDataForDemocracy** as a genuine data-altruism campaign, using the Data Governance Act's existing consent-form mechanism to let citizens voluntarily route data toward democratic oversight and evidence-based policymaking.
4. **Keep it a commons**: opt-in, revocable, reward-free, and open to researchers, journalists, civil society and public administrations alike.

Corporations have built some of the most valuable companies in history on data citizens gave away for free. We are not asking Europe to imitate that model — we are asking it to invert it: to prove that data given freely, for a purpose citizens actually choose, can build something no advertising algorithm ever could: a more transparent, accountable, and genuinely participatory Union.

We stand ready to collaborate with EU institutions, civil society, and the research communities that already animate the European Open Science Cloud and the European Health Data Space, to make #MyDataForDemocracy a reality.

Sincerely,
Marco Cappato - Founder & President, EUMANS
Francesco Vecchi - Civic AI Campaign Coordinator, EUMANS