European Digital Sovereignty

An analysis of vendor lock-in, geopolitical vulnerability and market failure in the cloud services market.

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Revised 27 September 2026: Every figure now has a source and year, the ICC account follows the doctrine, assessments of Gaia-X are marked as assessments, and the description of exit cost follows the Tetris article. The claim about PST has been removed because the source does not support it, and the reference to NSM now points to NSM's statement from 2020.

Over the past decade, cloud infrastructure has gone from a competitive advantage to a precondition for operations in both business and public administration. In 2025, 52.7 per cent of EU enterprises used paid cloud services, with Finland (79.2 per cent) and Italy (75.6 per cent) highest. [1]

Amazon, Microsoft and Google account for 70 per cent of the European cloud services market. The share held by European providers fell from 29 per cent in 2017 to 15 per cent in 2022 and has stayed there. [2] My assessment is that this concentration weakens European digital sovereignty.

Three mechanisms: vendor lock-in, jurisdiction and sanctions

1. **Vendor lock-in:** The cost of moving lies mostly in work: integrations that must be rebuilt, proprietary data formats that must be converted, and staff who must be retrained. Data egress is usually the smallest item, and since 2024 the three largest providers have offered free egress to customers who leave. [3] The EU Data Act bans switching charges from 12 January 2027. [4] A worked example is in "The Tetris Syndrome".

2. **Jurisdiction:** Where data is stored does not on its own decide which law applies. The US CLOUD Act can compel US providers to hand over data they control, wherever that data is stored. [5]

3. **Sanctions:** After the United States imposed sanctions on the Chief Prosecutor of the International Criminal Court (ICC) in 2025, he lost access to his Microsoft email. [6] Microsoft disputes that the court's services were stopped. [7] The ICC has since decided to switch from Microsoft Office to openDesk, an open-source suite. [8]

Why has this not been solved yet?

Europe has tried, among other things with Gaia-X from 2019. My assessment is that the project has not produced European alternatives that change the market. Francesco Bonfiglio, former chief executive of Gaia-X, says the mistake was allowing lobbies to remove or dilute the requirements. [9] Critics also point out that the US providers the project was meant to offer alternatives to were given a place in the work, and that it drifted towards standards and certification rather than working software. [10]

At the same time, European companies license US technology and operate it in Europe, as in the French "Cloud de Confiance" scheme. [10] My assessment is that control over the software

then still lies with the US provider.

The way forward: Pragmatic Patriotism

The doctrine distinguishes between the target and the everyday rule, pragmatic patriotism. For organisations, that means four things:

1. **Open standards:** Open data formats and interfaces make it possible to switch provider. Jurisdiction follows whoever operates the service, so open standards turn jurisdiction into a choice.

2. **Phased migration:** The transition happens in waves, starting with low-risk components, so that operations stay stable.

3. **Usability:** A secure solution that is hard to use will not be adopted. The user experience has to be part of the architecture.

4. **Organic distribution:** Technical SEO can deliver growth without paid advertising. It is still a dependency on search engines, in practice Google.

Summary

In 2020, the Norwegian National Security Authority (NSM) expressed concern about the overall national dependency on foreign cloud service providers. [11] My assessment is that the question for Norwegian organisations is how, and how quickly, to reduce their dependency on a small number of foreign providers. In practice, the change happens one component at a time, with open systems that are easy to use.

Sources

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[6] Theodore Christakis, Lawfare: “When Governments Pull the Plug”, 29 September 2025. https://www.lawfaremedia.org/article/when-governments-pull-the-plug

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