



Common European  
Data Spaces and  
Robust AI for Transparent  
Public Governance

**CEDAR**

## **POLICY RECOMMENDATIONS FROM PILOTS TO IMPLEMENTATION**

**from the CEDAR Project**

Submitted as part of CEDAR EU Project outcomes

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This Policy Paper reflects the collective expertise  
and contributions of the entire  
Horizon Europe project consortium.



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## Executive Summary

Common European Data Spaces (CEDs) sit at the heart of the **European Data Strategy**<sup>1</sup>. By providing relevant data infrastructure and governance frameworks, these data spaces should facilitate the pooling and sharing of data within and across sectors in Europe. Broadly speaking, CEDs are EU-wide common, interoperable data spaces in strategic sectors in which data pooling and sharing takes place.

The general key features of a common European data space as outlined in the Commission's first Staff Working Document<sup>2</sup> published in 2022, are:

- A secure and privacy-preserving infrastructure to pool, access, share, process and use data.
- A clear and practical structure for access to and use of data in a fair, transparent, proportionate and non-discriminatory manner and clear and trustworthy data governance mechanisms.
- European rules and values, in particular personal data protection, consumer protection legislation and competition law, are fully respected.
- Data holders will have the possibility, in the data space, to grant access to or to share certain personal or non-personal data under their control.
- Data that is made available can be reused against compensation, including remuneration, or for free.
- Participation of an open number of organisations/individuals.

<sup>1</sup> <https://digital-strategy.ec.europa.eu/en/policies/strategy-data>

<sup>2</sup> <https://digital-strategy.ec.europa.eu/en/library/staff-working-document-data-spaces>

There are currently 14 Common European Data Spaces in development across various sectors and domains, covering the following ones: agriculture, cultural heritage, energy, finance, green deal, health, industry/manufacturing, language, media, mobility, public administrations, research and innovation, skills, tourism.

In this regard, a pivotal objective of the CEDAR project is to develop a roadmap that comprises policy recommendations to facilitate a systematic approach to implement a European strategy that employs AI and Data for the purpose of combating corruption and the establishment of Data Spaces.

## The CEDAR Project

### Introduction

Currently in its last year, the CEDAR project is validating its technologies through high-impact pilots. Pilots in Italy, Slovenia and Ukraine focus on the health sector, analyzing historical bidding data from hospitals and ministries to identify risk patterns in medical supply chains.

The project's progress is measured not just in lines of code, but in the creation of **Interoperable Connectors and AI tools** that allow any public organization to plug into the CEDs ecosystem and get deep analysis. By 2026, CEDAR aims to have successfully shared novel AI-driven indicators, high-quality procurement datasets and enriched different CEDs (Common European Data Spaces), providing a blueprint for the "Digital Decade 2030<sup>3</sup>".

<sup>3</sup> <https://digital-strategy.ec.europa.eu/en/policies/europes-digital-decade>

The CEDAR project represents a fundamental shift in how we view the relationship between the public sphere and data.

By moving from reactive oversight to proactive, AI-driven management, the EU is setting a global standard for transparent governance.

Through the use of CEDs, CEDAR ensures that public procurement is no longer a collection of isolated transactions, but a unified, intelligent ecosystem. In this new era, data is not just a record of the past: it is a tool for building a more fair, competitive, and trustworthy European future.

The CEDAR project has produced evidence-based insights from pilot implementations across multiple European contexts in Italy, Slovenia and Ukraine.

**These recommendations are grounded in empirical findings and aim to accelerate the responsible adoption of Artificial Intelligence (AI)-driven Common European Data Spaces (CEDs) solutions in public procurement and public sector data governance.**

**This document represents certain current foundational policy recommendations intended to support future planning, implementation and scale-up of the project's findings.**

## **POLICY RECOMMENDATION 1:**

### **Strengthen Digitalisation, Data Quality, and Multi-Source Integration**

CEDAR findings reveal that digitalisation maturity across public administrations remains uneven. While some administrations operate advanced digital infrastructures, others remain at early stages. Crucially, even in more digitalised contexts, data quality emerges as the primary enabler, rather than a secondary concern, for the effective deployment of AI solutions and meaningful participation in Data Spaces. The Ukrainian pilot further demonstrated that integrating diverse, multi-source datasets substantially improves risk detection, anomaly identification, and decision support.

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#### **Recommended Actions:**

- Develop EU-level frameworks that address both ends of the digitalisation spectrum: support for administrations still in early stages, and data quality and interoperability standards for those already operating digitally.
- Promote systematic integration of heterogeneous data sources within public sector AI applications, with interoperability as a design requirement rather than an afterthought, and ensure that common standard set of procurement fields such as procedure type, supply type, contracting authority, tender value, and reporting period are captured through controlled and harmonised vocabularies.
- Fund capacity-building programmes that pair technical assistance with governance support, enabling public administrations to maintain data quality standards over time and monitor their consistent application.
- Provide clarifications about the re-use of public databases and openly available data sources, considering the new possibilities for data gathering.

## **POLICY RECOMMENDATION 2:**

### **Improve Legal Alignment to Facilitate Implementation**

A key finding from CEDAR is that the principal barrier to CEDs and AI adoption in public procurement is not technological but institutional including governance and legal ones. The challenge is primarily one of implementation governance. Public administrations need clear organisational mandates, operational procedures, responsible actors and legal certainty in order to adopt and scale these solutions. While overlapping European and national legal frameworks can create uncertainty, the problem is often broader: rules and responsibilities do not always translate into clear implementation pathways. Future policy should help public authorities move from pilots to responsible deployment by strengthening governance, operations, and legal frameworks. For once, the Italian pilot demonstrated that the coexistence of numerous, overlapping regulatory provisions and exceptions generates significant uncertainty for practitioners, limiting both implementation and scalability. Similar challenges were observed in the Slovenian and the Ukrainian context. This fragmentation directly impedes cross-country transferability of CEDs solutions.

## **2**

### **Recommended Actions:**

- Prioritise clarification and alignment of existing legal frameworks over the introduction of new regulatory layers, reducing interpretive uncertainty for public administrations.
- Develop practical guidance instruments, such as implementation of handbooks and legal mapping tools, tailored to the specificities of AI use and data sharing and re-use in public procurement.
- Establish coordination mechanisms at EU level to facilitate regulatory convergence, drawing on evidence generated by research and innovation projects such as CEDAR and on operational feedback from contracting authorities.

## **POLICY RECOMMENDATION 3:**

### **Communicate the Value of AI and Data Spaces Clearly and Accessibly**

CEDAR consistently identified a gap between the technical sophistication of Data Space solutions and the capacity of public sector stakeholders to understand and adopt them. Solutions are frequently presented in ways that emphasise architectural complexity over practical benefit, limiting uptake. Equally, the complementarity between AI and Data Spaces, and the specific added value each brings, remains poorly understood among target users.

Recommended Actions:

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#### **Recommended Actions:**

- Shift communication strategies toward outcome-oriented framing: underline tangible benefits, concrete use cases, and operational impact rather than technical specifications.
- Support the development of accessible communication materials, including case studies, explainer resources, and demonstration environments, aimed specifically at public sector decision-makers and procurement practitioners.
- Encourage EU-funded projects to include dedicated dissemination activities that build user understanding and trust, treating communication as a core project deliverable.

## **POLICY RECOMMENDATION 4:**

### **Drive Adoption Through Usability and Clarity of Outputs**

Findings from CEDAR demonstrate that the interpretability of analytical outputs is a decisive factor in whether AI tools in CEDs are actually used within public administrations. Clear, simply presented statistics proved to be among the most valued features of the CEDAR solutions, directly supporting decision-making, lowering barriers to adoption, and reducing manual burden by administrative simplification. Overly complex outputs reduced impact even when underlying solutions were technically sound, reinforcing that usability is not peripheral but central to value delivery.

While much of CEDAR's work focuses on identifying risks and anomalies in individual tenders, these tender-level insights should be complemented by an institutional monitoring layer. A procedure-mix measure developed within CEDAR is one example of an easy to implement tool that can help public administrations observe how procurement practices within a contracting authority, department, region, or supply category change over time, making gradual shifts toward more or less open procedures visible internally. In the context of CEDs, such indicators also illustrate the value of sharing not only raw tender data, but also harmonised procurement metadata. Where comparable institutions are willing and legally enabled to exchange metadata on procedure types, time periods, contracting authorities, and procurement categories, Data Spaces could support peer comparison and collective learning across similar organisations, while avoiding the need to expose sensitive tender-level details unnecessarily.

## 4

### **Recommended Actions:**

- Establish EU-level standards and guidelines for the presentation of AI supported analytical outputs in public sector contexts, prioritising clarity, accessibility, and actionability, and diagnostic interpretation.
- Require that publicly funded AI projects demonstrate usability as a measurable outcome, embedding user-centred design principles from early development stages and ensuring that analytical outputs remain interpretable, traceable, and linked to underlying data.

### **POLICY RECOMMENDATION 5:**

#### **Make Common European Data Spaces Operational by Removing Data Sharing Barriers**

After three years of implementation, CEDAR provides direct empirical evidence that CEDs remain largely non-operational in practice. Two compounding barriers account for this gap.

First, the technical complexity of participating in a Data Space remains prohibitively high for most public administrations, requiring specialist knowledge and infrastructure that many organisations, particularly those at earlier stages of digitalisation, do not possess.

Second, and more fundamentally, there is no clear, trusted, and low-friction mechanism for data holders to approve and authorise data sharing. In the absence of such mechanisms, the default behaviour of public authorities and other data holders is to withhold data, not because of unwillingness, but because the process for granting sharing permission is legally uncertain, administratively burdensome, and insufficiently supported. The result is that Data Spaces, as currently designed, cannot fulfil their intended role as the backbone of a European data economy.

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### **Recommended Actions:**

- Establish clear, standardised data sharing agreement frameworks that give data holders, including public authorities, legal certainty and a simple, repeatable process for approving data flows into Data Spaces, clarifying the different actions embedded in data sharing, including the possibilities and differences between data access and availability.
- Create and fund trusted intermediary roles (e.g. data stewards or data trustees) at sectoral and cross-border level, empowered to facilitate and oversee data sharing decisions and reduce the burden on individual organisations, and investing in interoperability solutions.
- Simplify the technical onboarding process for Data Space participation, developing accessible toolkits and reference implementations that do not require specialist expertise to deploy.

## **POLICY RECOMMENDATION 6:**

### **Embed Responsible AI, Human Oversight and Auditability**

AI in public administration must support administrative responsibility, not replace it. CEDAR's experience shows that trust in AI-driven analytics depends on the ability of users to understand what a system has produced, why a result matters, how it can be checked, and who remains accountable for follow-up action.

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### **Recommended Actions:**

- Require AI tools and Data Spaces to include clear human oversight arrangements, defining who reviews outputs, who can challenge them, and who is accountable for decisions based on them.
- Avoid fully automated decision-making in sensitive contexts. AI should support prioritisation, monitoring and evidence-based review, while final administrative judgement remains with competent human authorities.
- Build user trust through training, participatory testing and feedback loops with involved authorities, oversight bodies and operators.

## **CONCLUSIONS**

The CEDAR project provides concrete, pilot-tested evidence that the barriers to CEDs and AI adoption in the public sector are largely systemic, spanning data governance, institutional governance complexity, communication, and usability, rather than purely technological. Addressing these barriers requires coordinated policy action at the EU level. CEDAR, as one of the first CEDs related EU funded projects, invites EU institutions to consider these recommendations in the context of ongoing work on the European Data Strategy, the AI Act implementation, and public procurement reform.



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