European Commission

# Supporting EU policy implementation with co-creation

## THE CASE OF THE INTEROPERABLE EUROPE ACT

*This policy brief explores the role of co-creation as a strategic approach for supporting the implementation of EU policies. It focuses on how collaborative processes ensure that policies not only meet the practical needs of diverse stakeholders while fostering innovation and ownership. Drawing on two cases within the context of the Interoperable Europe Act (regulation (EU) 2024/903)[1], this brief illustrates how co-creation can support policy implementation, while contributing to digital transformation across the EU.*

## SETTING THE SCENE

In recent years, co-creation has gained significant traction in the EU's policymaking framework as a participatory approach that fosters collaboration between diverse stakeholders. Societal challenges such as digital transformation, sustainability and cross-border collaboration are becoming more complex and multifaceted, but traditional top-down governance models often fail to properly address them[1].

Co-creation enables policymakers to engage with a wide range of actors, including citizens, businesses, academia, civil society and different public sector organisations. This approach ensures that policy solutions are more holistic, more innovative and better suited to the diverse needs of these stakeholders[2]. Co-creation has recently gained prominence in EU initiatives such as the European Green Deal, the Partnerships for Regional Innovation and the Smart Specialisation Strategy. This reflects a shift towards collaborative governance that responds to diverse actors' needs[1][3].

## CO-CREATION PROMISES IN EU POLICY

### Defining co-creation

'Co-creation' is a collaborative and participatory process in which multiple stakeholders – ranging from public administrations to citizens, businesses, academia and civil society – work together in designing, implementing and evaluating public services and policies. Unlike traditional governance tools, which often operate in a centralised top-down manner, co-creation emphasises the active participation of stakeholders at all stages of the policy cycle. This inclusive approach not only fosters shared ownership but also ensures that policy solutions are informed by a wide range of perspectives and expertise. This makes them more relevant, innovative and effective[3][4].

As a form of participatory governance, co-creation encourages collaboration that bridges the gap between policymakers and those affected by policy outcomes[5]. Co-creation engages those who are affected more closely in the design process, often allowing them to propose and design practical solutions within the overall policy framework. It can also add value by aligning diverse perspectives and experiences that the various actors may have in the development of policies[5]. This is a particularly effective approach in fields that are characterised by the dynamic evolution of business models and social

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1 *Interoperable Europe Act (IEA)*

impacts, which often outpace the relatively slower processes of public administrations[6].

The increasing complexity of societal issues (such as digital transformation, sustainability and cross-border collaboration) requires multifaceted solutions that no single organisation can fully provide. By involving a range of stakeholders, co-creation enhances the adaptability and responsiveness of policies, allowing them to better address the unique challenges faced by different communities[5]. In the EU context, co-creation is increasingly recognised as an appropriate method for policy innovation because it is able not only to increase the relevance of policies but also to build trust between stakeholders and enhance the legitimacy of policy outcomes[1]. Co-creation can also 'improve coordination vertically between government and other actors and horizontally in terms of inter-agency coordination'[7].

## EU policy commitment

The EU has made significant progress in this context, with the participatory spirit embedded in the EU Better Regulation guidelines[2] promoting stakeholder engagement where experts, individuals and groups actively shape policymaking through consultation and data-sharing.

A review of co-creation in EU policy reveals diverse applications. An early example from 2013 promoted a shared EU identity through the 'Co-Creating European Citizenship' initiative'[3]. Other applications include the environment (e.g. nature-based solutions[4]), food systems (e.g. food contact materials and transformation[5]) and the recent Commission Recommendation (EU) 2024/774[6] providing guidelines for fostering co-creation between academia and industry to better exploit knowledge.

In the public sector, the European Network of Public Employment Services[7] has used co-creation with stakeholders to improve inclusivity and effectiveness. Digital government examples include the Digital Decade strategy[8], which aims to accelerate the EU's digital transformation by 2030. The strategy explicitly promotes participation and co-creation, emphasising the need for collaboration between Member States, institutions and citizens to achieve a digitally cohesive and sustainable Europe[9].

At a policy level, the EU's commitment to collaborative governance and co-creation is further highlighted in the Tallinn and the Berlin Declarations[10], which call for user-

centric and transparent digital services that are developed through the active involvement of stakeholders[11]. Moreover, in the European Green Deal[12], co-creation plays a key role in shaping environmental policies that are inclusive and aligned with the needs of diverse sectors, also reflecting elements of participatory democracy embedded within sustainable development thinking.

Notably, the Interoperable Europe Act (IEA) reflects this shift towards participatory policymaking, encouraging collaboration between Member States in ensuring interoperability in human-centric digital public services.

The adoption of co-creation within EU initiatives underscores the EU's recognition of the value of inclusive multi-stakeholder approaches in tackling complex policy challenges[8]. Co-creation has continued to gain traction across EU policymaking, with efforts evolving to formalise and institutionalise this participatory approach. In 2022, for instance, the European Economic and Social Committee (EESC) called for co-creation through an own-initiative opinion[13], proposing an EU-level toolkit and framework to promote the co-creation of high-quality services of general interest, engage all stakeholders and encourage best practices for a more participative democracy.

## Co-creation for digital transformation

Co-creation is particularly well suited to addressing complex policy areas (e.g. digital transformation), where the involvement of a diverse set of actors is crucial for success[9]. In the area of digital governance, issues such as cross-border data sharing, interoperability and cybersecurity require policies that are not only technically sound but also sensitive to the diverse needs and expectations of different stakeholders. This can even extend to the local level with associated assessments and feedback to local and regional governments in areas such as innovation – for example, the Digital Maturity Assessment tool[14] for European Digital Innovation Hubs and their private or public sector customers; and local digital health-checks – especially through LIVING-IN. EU's LORDIMAS[15] initiative.

Traditional top-down approaches often lack the flexibility and adaptability needed to address these complexities. This is where co-creation offers certain advantages. In digital transformation, for example, involving local administrations, technology providers and end users helps to identify potential barriers early on and to generate innovative solutions that would be difficult to achieve through centralised planning alone[9]. Co-creation also fosters a sense of ownership among stakeholders, which can lead to more engagement, adoption and long-term sustainability of the policies being implemented[4].

2  *EU Better Regulation Guidelines*

3  *Co-creating European citizenship: policy review*

4  *Guidelines for co-creation and co-governance of nature-based solutions*

5  *Everyone at the table: co-creating knowledge for food systems transformation*

6  *Commission Recommendation (EU) 2024/774*

7  *European Network of Public Employment Services*

8  *Europe's Digital Decade*

9  *Digital Decade report 2023*

10  *Berlin Declaration on Digital Society and Value-based Digital Government*

11  *The Tallinn Declaration*

12  *The Role of Citizen Science in the European Green Deal*

13  *EESC 2022/00662*

14  *European Digital Innovation Hubs Network - DMA Tool*

15  *LORDIMAS*

In the context of digital transformation, interoperability is a key enabler of seamless cross-border services within the Digital Single Market. Co-creation can strengthen this by ensuring that different national systems and perspectives are taken into account. By actively involving Member States, businesses and technology providers in the policy process, the EU can ensure that interoperability solutions are technically feasible, user-friendly and widely accepted across different jurisdictions.

Co-creation is therefore closely related to the concept of interoperability, where principles such as user-centricity match technological developments to people's needs and where digital transformation can look to multi-stakeholder partnerships with, for example, citizens and business in order to enable significant change in policymaking and service delivery. In particular, where a legal act may form a common point of departure, co-creation helps ground policy objectives in the local realities for those engaged. This can also mean that by engaging in co-creation, both policy owners and stakeholders can not only collaborate but also learn from one another, creating a joint understanding of key issues, the nature of participation, itself, and, increasingly, how both are articulated and shaped by their technological and organisational contexts.

## APPLYING CO-CREATION TO THE INTEROPERABLE EUROPE ACT

In this section, we will dive deeper into two cases of co-creation applied to the IEA.

The IEA is a significant legislative measure aimed at fostering digital transformation across the EU by ensuring that digital public services can be seamlessly accessed and used in different Member States. More concretely, the IEA focuses on cross-border interoperability of digital services, systems and data. Article 3 of the IEA requires new or significantly modified binding requirements for digital public services to undergo interoperability assessments (IOPAs)[16] in order to ensure that they are 'interoperable-by-design' from the outset. This not only promotes technical integration but also legal, organisational and semantic alignment between Member States, thus reducing fragmentation and enhancing the efficiency of cross-border digital service delivery.

The IEA plays a critical role in enabling digital public services to be accessible and functional for all EU citizens and businesses, irrespective of national borders. It is supported by dedicated governance and coordination activities carried out by EU institutions and the Member States. The IEA's implementation needs to be monitored annually[17], as stated in Article 20, in order to assess the state of cross-border interoperability in the EU.

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16  *Interoperability Assessments: Exploring expected benefits, efforts and challenges*

17  *Co-creation workshops on the monitoring of the Interoperable Europe Act*

## Box 1. Co-creation of the interoperability assessments guidelines

### Scope

The scope of the IOPAs, which is defined in Article 3 of the IEA, is the basis for the development of the IOPA guidelines. The drafting of the first version of the **Guidelines for Interoperability Assessments**[18] is an example of co-creation supporting policy implementation. The Commission (DG DIGIT and the JRC) played a central facilitative role, while the guidelines were primarily shaped by the Member States through a collaborative process.

The co-creation involved representatives from national and regional administrations, EU institutions and academic specialists in interoperability and public sector innovation. Their collective expertise established guidelines that aim to be comprehensive, clear and flexible. As no prior interoperability assessments existed, the process relied on comparable practices, which added an additional layer of complexity to the co-creation process.

The process unfolded in two main phases: drafting and piloting the guidelines.

### Methodologies

- *Collaborative co-drafting:* following initial inputs, drafting groups were formed. They were composed of volunteers from Member States that led and mentored the drafting of specific chapters of the guidelines with the Commission's support. This collaborative approach ensured that the guidelines reflected a range of perspectives and the practical needs of those involved in their implementation.

- *Pilots:* Member States and EU entities volunteered to test the guidelines by conducting pilot IOPAs in their own public administrations. These pilots provided actionable feedback and helped to identify gaps, refine the assessment criteria and improve the usability of the guidelines. During this phase, regular 'piloters' coffee' meetings provided a platform for sharing experiences and feedback. These informal but valuable discussions were instrumental in refining the guidelines.

- *Co-creation workshops and sessions:* a series of online and in-person workshops facilitated continuous collaboration throughout the process. These sessions allowed stakeholders to contribute their expertise, share experiences and provide iterative feedback on the guidelines. Following the pilot phase, the process culminated in a final online consolidation workshop that validated the guidelines and incorporated final feedback. This concluded the main co-creation process.

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18  *Adopted by the Interoperable Europe Board on 5 December 2024.*

## ADDRESSING CHALLENGES AND SOLUTIONS

The co-creation process implemented to develop both the IOPA Guidelines and the IEA monitoring framework revealed common challenges that are often encountered in multistakeholder collaboration. Drawing on practical experience and academic literature, these challenges illustrate the complexities inherent in participatory policymaking:

— **Diversity of stakeholders:** one of the core challenges was to manage the wide range of stakeholders, each of whom had different interests, priorities, backgrounds and experiences. Such diversity often leads to divergent perspectives that could slow down consensus-building[10]. For instance, Member States with more advanced digital infrastructures might push for more complex future-oriented guidelines, or for sophisticated monitoring systems that are seamlessly capable of collecting data assessment reports. However, Member States at an earlier stage of digital development may have a different approach, with consequences for implementation and costs.

Moreover, some Member States claimed that the initial draft of the guidelines was not 'actionable enough', which showed that there are different expectations regarding the results. To address this challenge, the co-creation process included regular workshops and collaborative feedback sessions, where stakeholders could share concerns and identify common ground. This approach fostered focused and productive discussions. The continuing and informal dialogue helped bridge gaps between varying perspectives. In particular, structured iterative feedback-loops in co-creation processes enabled a more inclusive decision-making process by giving all stakeholders a voice and fostering trust[4].

Fundamental to this process was the clear assignment of tasks and transparent handling of contributions, ensuring that expectations were managed, and engagement was encouraged while respecting the institutional constraints. This helped create proposals for governance bodies to potentially approve. Differences in participants' authority or expertise could have led to power imbalances and allowed some voices to dominate the conversation. To address this challenge, it was important to create an environment that encourages equal participation, so that everyone has an opportunity to contribute and be heard. Facilitating discussions with a neutral moderator can also help maintain a level playing field for all participants.

— **Variations in digital maturity:** another significant challenge was the varying level of digital maturity between Member States. Some Member States had advanced digital infrastructures, while others were still developing foundational systems. This disparity made it challenging to create a one-size-fits-all set of guidelines. Such a challenge of the heterogeneity of stakeholder capacity is known as 'capacity asymmetry' in co-creation research[11].

To address this, the pilot phase of the co-creation process allowed for real-time adjustments, ensuring that the guidelines were ambitious for digitally advanced Member States but that could also be implemented by those still building their digital capacities. This flexibility helped ensure that the guidelines could be applied across a broad spectrum of organisational contexts.

Similarly, differences in monitoring methods, application areas, targeted and/or involved stakeholders and

technologies made it difficult to reuse existing data from the Member States' monitoring efforts. Interoperability issues (e.g. converting and sharing data within a common framework) increased the challenge. The proposed approach addressed this by focusing on reusing the data the IEA would produce, itself, as key evidence. This evidence would, once organised into a knowledge-base, allow data-driven analyses in key areas, while remaining flexible and allowing new data to be included over time.

— **Sustaining momentum and engagement:** Academic studies indicate that long-term engagement in co-creation processes can wane if stakeholders feel disconnected or perceive delays in outcomes[3]. Given the complexity of the task – developing guidelines that would work across 27 Member States – it was important to keep participants actively involved and motivated. Each phase of co-creation, therefore, had tangible outputs (e.g. drafts, revisions and pilot results) which kept participants focused on short-term goals within the larger project.

   Similarly, developments in the monitoring scheme had clear plans and timelines. Evidence was communicated at key events and regular whole-group contact ensured that all Member States had the opportunity to contribute to the activities.

   Thus, for both cases, regular updates and tangible interim achievements were key to maintaining momentum, demonstrating progress and preventing disengagement.

— **Time and resource constraints:** coordinating schedules across activities, which often ran in parallel, and allocating appropriate tasks to the different participants was sometimes difficult. This sometimes meant that not everyone who was initially involved could attend, or that the organiser had to hold duplicate sessions and piece together contributions. To address this, it was essential to plan sessions well in advance and to offer flexible meeting options, such as virtual sessions.

## BENEFITS OF CO-CREATION

Based on insights from the field and exchanges with experts involved in co-creation processes, several benefits can be recognised, particularly when applied to policy implementation.

### Enhanced stakeholder engagement and collaboration

Co-creation fosters deeper stakeholder engagement by actively involving those responsible for implementing the policy in its development. This participatory approach ensures that policies are better aligned with stakeholders' needs, fostering ownership and mutual understanding [4][9]. For example, in the context of the IEA, the iterative feedback process, including informal 'piloters' coffee' meetings and live group editing of monitoring materials, further contributed to enhanced collaboration by enabling the exchange of insights and experiences. The sense of ownership generated by such collaboration enhances the likelihood of successful policy adoption and smoother implementation.

### Improved usability and clarity

Another key benefit of co-creation is the development of policies that are clearer and ultimately more user-centric. By incorporating diverse perspectives from those that are affected by, or responsible for, the policy, co-creation helps to identify potential challenges early on and address them in the design phase. This can also be a chance to innovate by devising creative solutions/ideas that might not emerge in a traditional policymaking process. In both the examples, this resulted in guidelines and monitoring efforts that brought users clearly into focus so that they were not passive recipients of the IEA but stakeholders able to act with better understood characteristics in practice.

For instance, the co-creation process for the IOPA guidelines specifically demonstrated this by incorporating iterative feedback loops and piloting activities. These efforts improved their clarity and accessibility for end users. It also provided clearer and more focused directions for implementation, helping to increase efficiency in the development of supporting documentation and online resources.

Research supports this, showing that co-creation processes lead to more usable and actionable policies, because they are tailored to the practical contexts in which they will be applied[3].

### Cross-border applicability

Co-creation is particularly suited to policy areas that require cross-border collaboration, and hence of key interest to EU policies. These include interoperability, which is one of the pillars of digital transformation in the EU. By engaging stakeholders from the Commission and Member States, co-creation ensures that policies are designed with cross-border challenges in mind from the outset. This approach facilitates the development of solutions that are applicable in different national contexts while adhering to overarching EU objectives. Through co-creation, policy needs can be confronted with the cross-border context where EU level intervention is not only appropriate but points to where public value can be created in practice.

For example, in the case of the IOPA Guidelines, co-creation led to the development of flexible but harmonised guidelines that support seamless cross-border digital services, which is a core goal of the IEA.

Academic literature shows the value of co-creation in fostering cross-border cooperation and ensuring that policies are flexible enough to accommodate diverse legal, cultural and technical environments and create a European view on them[9].

### Tailored and sustainable solutions

The participatory nature of co-creation ensures that the resulting policies are adaptable to diverse administrative and

technical landscapes. By involving Member States directly in the drafting process, the IOPA guidelines became flexible enough to accommodate varying levels of digital maturity while maintaining a high standard of technical soundness.

Similarly, stakeholders involved in monitoring helped ensure that proposals were aligned with both policy objectives and technical developments. Teams working with the Interoperable Europe Portal web development and IT aspects participated in workshops and were regularly updated. This approach allowed potential data-driven strategies to be considered early on in order to optimise automation, digital readiness and efficiency when designing the future monitoring system.

## CONCLUDING REMARKS

In conclusion, the following lessons and recommendations may help advance co-creation in future policy development:

- **Embed co-creation as a standard practice:** co-creation has proven its value in enhancing stakeholder engagement and creating more tailored and practical solutions. This iterative process should be continued in order to ensure that policies remain adaptive, relevant and well-aligned with the needs of diverse stakeholders, bringing policy into practice. Future iterations could explore the suitability of expanding stakeholder representation to include more local and regional authorities, thereby increasing applicability and buy-in for those often faced with implementation.

- **Scale-up piloting activities:** piloting the implementation of the IOPA guidelines proposal could provide valuable insights, particularly in testing policies in different Member States and at different administrative levels.

- **Broader application:** the application of co-creation in other EU policies that require technical and digital innovation would enhance their implementation by meeting the complex demands of a digital society and by empowering citizens and other stakeholders to play an active role in shaping their future. In addition, it is important to consider existing networks in each of the areas that need technical or digital innovation as these can translate co-creation results to a wider audience.

- **Foster cross-policy-area learning for greater innovation:** sharing experiences and lessons learned from co-creation across different policy areas could lead to more consistent and effective methods in the Commission. Establishing a common understanding and practices among stakeholders could enhance engagement and promote joint learning, driving more sustainable policy outcomes where digital policies meet.

- **Strengthen support structures:** to further enhance co-creation in EU policies, support structures should include: targeted training by building digital and co-creation skills for all participants, especially for

facilitators or those scoping consultation activities; robust governance frameworks by establishing clear guidelines, data protection standards and evaluation metrics to ensure transparency, ethics and adaptability; and digital tools, such as collaborative platforms (e.g. Cryptpad) or crowdsourcing applications, to facilitate interaction and participation.

- **Challenges in co-creation application:** participatory approaches share power, tending to consensus through compromise, as typically seen in EU policymaking. They take more time and any potential radical approaches may be set aside. Having established a common ground, implementation requires procedural rigour, where diverging interests, varying local contexts and power imbalances may occur. The institutional setting of the EU may also face challenges in reaching all stakeholders equitably, although this should still be recognised as a principle and an ideal for democratic policymaking. Similarly, not all topics are suited to co-creation, where sensitive topics, either for reasons of security or ethical considerations, may limit the multilateral stakeholder interactions and peer-learning that co-creation supports. These challenges, however, may be addressed by active experimentation and piloting with stakeholders, so any diversity or anomalies are uncovered early on, allowing adjustments to be made towards fit-for-purpose outcomes. Particular attention should be paid to the Regulatory Sandboxes in the IEA (Article 11) and the Artificial Intelligence Act (Article 57) in this experimental context.

## Call to action

As the EU continues to navigate complex policy areas that require innovative and collaborative approaches, it is essential to commit to co-creation as a standard practice in policy development. The EESC's proactive position on co-creation provides valuable guidance and a clear roadmap for integrating this approach into future policies. This includes the development of a toolkit to support co-creation models, drawing on lessons from pilot projects and providing practical guidance to policymakers.

Policymakers are encouraged to integrate co-creation processes into the formulation of future EU policies, especially in areas that require technical expertise and cross-border coordination. The EU can, thus, ensure that its policies remain future-proof by maintaining their relevance to stakeholders, adapting them to contemporary needs and keeping them effective and beneficial for all citizens and businesses across the EU. Such approaches will ultimately enhance the quality of public services and inclusive developments across the EU, across the whole policy cycle.

## SUMMARY

This brief outlines how co-creation can be an effective strategy for supporting policy implementation within the EU, particularly in addressing complex challenges such as digital transformation in the public sector. Co-creation actively involves stakeholders, such as Member States' representatives, external experts and Commission policymakers. It, thus, offers a powerful solution for shaping policies that are not only relevant but also widely accepted and effectively implemented. Co-creation fosters deeper and more active forms of engagement that reflect the needs and insights of diverse actors, resulting in more practical, user-centred and widely applicable policies, as well as the activities that support them. The experiences with the proposal of the IOPAs guidelines and the proposal for the monitoring scheme under the IEA showcase some of the key advantages of this approach – leading to policies that are both flexible and aligned with diverse (sub)national contexts, while also promoting ongoing cross-border collaboration to achieve common understanding and effective implementation.

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