



GERMAN AI ASSOCIATION

Position Paper for Europe 2030

FUTURE-PROOFING THE EUROPEAN UNION

*Our key policy priorities to make the
European Union an AI champion.*





INTRODUCTION

As this EU legislature draws to a close, the EU is in the midst of a transformative digital and technological era. During the last legislature, AI has clearly demonstrated its potential and opportunities for our societies and economies, and its ability to be part of the solutions needed to tackle our most pressing problems. It will play a key role in increasing productivity and reducing workloads in sectors such as healthcare and manufacturing. It will provide answers to emerging demographic challenges such as skills shortages, but also in tackling the effects of climate change and helping us move towards a sustainable future, to name but a few of these transformative opportunities.

In the near future, AI will play a central role in every sector of our economies and industries, and will be the enabler of the next wave of innovation around the world. It is therefore evident that the EU must find itself at the very centre of this innovation boost with its own EU-made AI solutions. If the EU is not able to position itself and European AI companies at the centre of innovation, the economic value will be created outside the EU, with disastrous consequences for the European single market.

Unfortunately, the outgoing Commission missed the opportunity to position the EU at the forefront of the global digital and AI world. The EU's share of global ICT market revenues has halved in the last 10 years, only reaching 11 percent in 2022, and it currently relies on non-EU countries for 80 percent of digital services and products, as well as infrastructure and intellectual property.¹ Instead, recent years have been a testament to the EU's commitment to regulation. While competitors such as the United States have focused on fostering their innovation and advancing this key technology, the EU has primarily emerged as the leading authority on AI regulation.

This paper sets out our key demands and policy priorities for the next EU legislature to secure the EU's place in the digital world, to shape the EU's AI destiny and to future-proof the EU. This initial position paper marks the beginning of a series by the German AI Association. Throughout this series, we will detail our key demands and outline policy proposals, guiding the new Commission and European Parliament throughout their term as we strive to shape a prosperous AI future in Europe. Together, let us embark on this journey to place the EU at the forefront of the AI frontier, where innovation thrives, digital sovereignty is secured, and the EU redefines what it means to be a global leader in the age of AI.



REGULATORY FRAMEWORK

The last legislature has seen a shift towards the regulation of AI and its various applications, with an unprecedented influx of new regulatory frameworks specifically targeting the digital and AI sector, placing a significant regulatory burden on European AI companies. Since the start of the current legislative term in 2019, the number of AI regulations adopted by the EU has increased from 10 to 32 by the end of 2023, not yet including the most prominent, complex, and far-reaching regulation, the AI Act.²

This influx of new regulations places a particularly heavy burden on AI start-ups and SMEs. For example, in a study on the impact of the AI Act on innovation, more than two-

thirds of AI companies expect negative consequences due to the regulatory burden.³ Moreover, this potentially negative impacts do not only apply to AI companies themselves: around 68% of German companies from traditional industries have expressed reluctance to deploy AI technologies for fear of breaking regulations, while almost half of these participants believe that excessive regulation is the main reason why innovative products such as ChatGPT are not being developed in the EU.⁴

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- For the next parliamentary term, we envision a **shift in the EU's approach from regulation towards fostering innovation**. Given the significant amount of new regulation that has been introduced in recent years, we strongly recommend that the next Commission takes a moment to reflect and evaluate the current situation before continuing to introduce new and additional AI regulation.
- Moreover, we recommend that the next Commission **takes advantage of the upcoming legislative reviews**.⁵ For example, the incoming Commission should concentrate on filling necessary gaps, addressing shortcomings, and concentrating on simplifying existing regulatory frameworks rather than introducing new ones and thereby increasing the regulatory burden on the European AI ecosystem. In both, the reviews of existing legislation and the creation of additional AI regulation, the EU must always prioritise guidance over restriction and recognise the dual nature of regulation as both a safeguard and a catalyst for opportunity.
- We strongly believe that the EU needs to **recommit to its core objective of creating and promoting a single EU market, including for the digital economy**. A single market can only work - and be beneficial - if all Member States adhere to a level playing field and consistent principles and rules, so we call on



BUREAUCRACY

The aforementioned increased regulatory burden on the European AI ecosystem is also accompanied by a significant increase in bureaucratic overhead, causing rising operational costs for European AI companies. Bureaucracy is an especially significant obstacle for start-ups in Germany and other member states.⁶ Particularly in the field of public funding programmes, European AI companies are often faced with complex and overbearing bureaucracy, which potentially even jeopardises the long-term success of these projects.

Another observation that can be made about the implementation of the new AI regulation is the considerable resources that will be required to ensure compliance with these regulations. This situation is paradoxical: while the EU and some member states have pledged resources to help start-ups navigate this additional bureaucracy, one has to question the efficiency of a system where companies have to seek funding just to comply with regulatory requirements. This scenario highlights a discrepancy between the ideal path for AI development and the bureaucratic processes that impede it.

The failure to address these bureaucratic inefficiencies therefore not only stifles innovation, but also risks undermining the long-term success of innovative AI companies and start-ups in the EU, thereby discouraging increased investment in AI solutions in the EU.

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- With the start of the next parliamentary term, the German AI Association calls for a **significant reduction of bureaucratic hurdles at EU level** in order to improve the conditions for European AI start-ups and SMEs to increase their operational efficiency instead of being held back by overbearing bureaucracy. By prioritising the reduction of bureaucratic overhead, the EU will be able to enable a more agile and innovative entrepreneurial ecosystem, paving the way for technological advancement.
- Furthermore, we advocate for the **simplification of funding mechanisms** at the Union level and the **harmonisation of support programmes** across the EU. Moreover, the next Commission should initiate a review and improvement of the European state aid framework.



DIGITAL SOVEREIGNTY

Rising geopolitical tensions and critical vulnerabilities in global trade and supply chains have highlighted some of the EU's vulnerabilities in recent years, giving some indication of the potential consequences for the EU in the face of sudden geopolitical changes. The EU's dependence on external technology, especially in the field of AI, is a growing concern. A significant proportion of digital technologies and services are currently procured from outside the EU, especially from China and the US, and this is already showing worrying trends.⁷ First, if the EU does not have its own alternative supply, it will not be able to rely on back-up solutions, potentially putting the EU economy at risk. Second,

if the EU does not succeed in becoming more globally competitive with its own digital business models and AI solutions, it will inevitably be at risk of losing its current level of prosperity.

Despite significant investment in other critical technology sectors, such as semiconductors, the EU AI industry is in a position of relative stagnation compared to the rest of the world. One particular example is the issue of AI infrastructure, however, this lag is not exclusive to physical infrastructure.⁸ While the outgoing Commission has put forward proposals and ideas on how to develop AI supercomputing infrastructure, these plans lack sufficient clarity on how the EU intends to make these resources available to the private sector.⁹

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- We urge the next Commission to recognise the pivotal moment the EU currently finds itself in and the urgency of strengthening its digital and AI sovereignty in the face of global challenges and geopolitical uncertainties. Therefore, a **significant investment in AI infrastructure** - especially dedicated AI supercomputing facilities - is essential.
- We propose that the next Commission **establishes a 'Digital Sovereignty Fund'**, similar to existing funds to tackle climate change or the joint undertaking "Chips Joint Undertaking" to boost semiconductor innovation and research within the EU. It is time for the EU to strengthen its AI supercomputing infrastructure in order to become a global leader in AI and secure its technological independence.



FINANCING AND FUNDING

While the EU has produced globally competitive AI unicorns and start-ups, it still lags significantly behind the US or China. When considering private investment in AI, while US-private investors collectively invested around \$67.22 billion in 2023, private investments in AI in the EU and UK combined only amounted to \$11 billion, with Germany as the highest ranking EU member state with \$1.91 billion.¹⁰

Furthermore, while private investments in the US have increased significantly since 2022, the EU has experienced a second consecutive year of declining investments in AI in general. In terms of private investment in generative AI, the EU only saw a small increase to 0.74 billion, while private investment in generative AI in the US skyrocketed to 22.46 billion.¹¹ This discrepancy in investment between the EU and the US underscores

the importance of fostering investor confidence and the necessity of improving access to funding, such as venture capital (VC). While there is objectively an urgent need to reform VC frameworks to attract investment, the importance of financial opportunities created by the implementation of AI in established industries cannot be ignored. Similar to private investment, we see that EU companies are lagging behind their US counterparts in the adoption of AI, especially in the area of generative AI.¹²

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- We propose that the next Commission outlines a **clear strategy on how it intends to improve investor confidence and stimulate private investment in AI** in the EU. We suggest that the next Commission evaluates existing frameworks for VCs and introduces incentives for incumbent industries to adopt and invest in EU-made AI solutions.
- One particular proposal is the **introduction of the so-called AI Voucher at Union level**, a German concept that is currently being discussed at Member State level.¹³ The *AI Voucher* is designed to encourage SMEs to implement AI solutions by reducing the financial risks associated with such projects. It provides financial support or subsidies for the development of AI applications in cooperation with European AI companies. By encouraging a wider range of industries to invest in AI solutions developed in the EU, it encourages direct investment in AI and highlights the role of governments in creating an environment conducive to innovation.
- Finally, we propose a **reform of the European Innovation Council and European public funding programmes**. For start-ups, these programmes are often overly bureaucratic, resulting in the waste of valuable resources and time of innovative teams engaged in research and the AI start-up ecosystem in the EU. We therefore propose to change the process in a direction very similar to that of VC firms: drastically reduce the application process and introduce pitches in front of diverse juries that then make investment decisions. After all, it is clear that the VC model is one of the most successful approaches to spot innovation.



RESEARCH

The growing role of AI in science spans a range of fields and disciplines, serving both as a driver of scientific breakthroughs and as an indispensable tool for research. AI's contribution to science is central to transforming our processes of exploration and understanding, shaping the future landscape of research and education. Despite these advances and the EU's rich tradition of academic excellence and a considerable pool of AI expertise, the EU still faces challenges in fully realising this potential. .

While commendable initiatives such as CLAIRE¹⁴ or ELLIS¹⁵ aim to consolidate AI re-

search and innovation across the EU, they face obstacles such as insufficient funding and bureaucratic complexities. Furthermore, translating this scientific prowess into lasting economic and technological leadership is fraught with challenges. Another obstacle to academic excellence in AI is the lack of secure, open data pools. This shortcoming ultimately hinders competitiveness in research, as it limits the ability of researchers and industry to fully exploit and use data for innovation. In addition, the differing policies on open data pools across Member States result in inefficiencies for researchers and hamper innovation.¹⁶

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- During the next mandate, we call for the **creation of a world-class AI research hub**, similar to CERN, with unparalleled financial resources and collaborative potential. Such a centre would provide a platform for a critical mass of AI experts to collaborate and exchange ideas, exploit synergies and create an AI research environment that would otherwise be too expensive for existing research centres. Such a centre of excellence for AI research could be a global beacon for AI talent and knowledge. As a public institution, it would also be able to address issues of EU digital sovereignty in AI in the public interest. Finally, investment in such a hub would allow for a centralised initiative to coordinate and organise AI research in the EU, thereby aligning knowledge and resources rather than creating avoidable competition.

The background of the top half of the page features a blue gradient with vertical columns of binary code (0s and 1s) in a lighter blue color. Overlaid on this are several yellow, five-pointed stars of varying sizes, some appearing as if they are glowing or moving. The overall aesthetic is digital and futuristic.

AI START-UPS AND SPIN-OFFS

AI start-ups are important drivers of innovation and play a crucial role in fostering innovation and ensuring continued economic growth and competitiveness. In the field of AI in particular, start-ups are not only an economic factor, but also of immense social importance. While the EU has been able to increase the number of AI start-ups almost continuously in recent years, with the notable exception of 2021 during the COVID-19 pandemic, the rate of increase is still significantly lower than in the United States. For instance, in 2023, almost 900 new AI companies were created in the US, while all EU Member States and the UK combined only saw around 370 new AI companies.¹⁷ Continuing efforts to increase this number is therefore a fundamental factor on the EU's path towards digital sovereignty in AI.

In addition, start-ups are one of the most promising avenues for translating research results into practical applications. By definition, start-ups are focused on growth and scaling their business models, so a spin-off will automatically scale up and maximise the impact of the underlying scientific achievements. It is therefore important to provide support for the start-up environment in order to stimulate innovation and strengthen the transfer of research into spin-offs.

Finally, looking at AI start-ups founded in recent years, studies show a disparity in the share of female or migrant founders. Taking Germany as an example, only about 13 percent of all AI start-ups are founded by at least one female (co)founder, and only about a quarter of all German AI start-ups are founded by people with a migrant background. While these observations are not unique to AI, they call for action, as gender stereotypes tend to be more prevalent in AI than in other IT and technology.¹⁸

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- We recommend that the new Commission **implement more incentives for the transfer of research into spin-offs**. These incentive structures should be embedded as long-term initiatives in research institutions in the form of support programmes for scientists. In addition, entrepreneurship courses should be made available to students in order to evaluate the spin-off potential of research results and thus promote the commercialisation of scientific innovation.
- The transfer of intellectual property (IP) and the commercialisation of scientific innovation are often significant barriers to spin-off creation. We propose that the next Commission develops a **unified European framework to improve the parameters for IP negotiations** and makes the conditions for granting IP more transparent for founders, as well as creating best practice exploitation agreements.
- Finally, we call for a concerted effort to **increase the presence of female and migrant founders** through policies tailored to support female and migrant entrepreneurs and to improve the framework conditions in all EU Member States.



TALENTS

While the number of AI and data scientists in the EU, as well as the number of graduates in the field, has increased in recent years, EU companies are still struggling to fill vacancies in the ICT sector, with a particular challenge in the AI sector. As a result, EU companies are hampered in their investments. According to a report by the European Commission, the growing ICT skills deficit in the EU will reach 12 million talents by 2030 if no action is taken.¹⁹

A review of the career trajectories of EU graduates in AI-related fields reveals a clear pattern of the migration of innovation and intellectual property to markets outside

the EU. This is evidenced by the fact that a significant number of AI-skilled graduates leave the EU for non-EU markets. Germany, for instance, has seen over half of its doctoral students in AI-related fields leave the country after graduation, primarily to the US, the UK, and Switzerland.²⁰ This phenomenon, known as 'brain drain', represents a significant challenge to maintaining economic value and influence in the global development and application of AI technologies.

To be at the forefront of global AI innovation, it is essential that the European AI ecosystem and its companies are attractive to international talent. Currently, there are numerous obstacles, including excessive bureaucracy in many EU Member States, which make it challenging to attract international talent. These inefficiencies not only impede innovation, but also risk further increasing the brain drain from the EU.

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- Looking ahead, we urge the next Commission to **step up its efforts to increase the number of graduates in AI-related fields in the EU** and to improve the conditions for, or even incentivise, graduates to continue their careers in the EU instead of migrating to other AI hubs such as the US or the UK.
- To address the growing shortage of AI talent for EU companies, we also urge the new Commission to set out a **strategy to make the EU more attractive to international AI talent**. This plan should, for example, include measures to address current bureaucratic inefficiencies for international talent acquisition across EU Member States.



SUSTAINABILITY

AI technologies have already shown remarkable effectiveness in the energy sector, contributing significantly to reducing CO₂ emissions across the EU.²¹ While the role of AI in contributing to climate action and achieving the Sustainable Development Goals has been explicitly recognised in the EU, the full potential of AI has yet to be realised. Key sustainability programmes involving AI often lack robust policy support, the necessary financial investment or the necessary infrastructure and data availability.²²

Realising the full potential of AI in sustainability programmes will require improved cross-sector collaboration and advocacy for streamlined regulatory frameworks, for example on data sharing and collection in the energy sector, coupled with investment in AI technologies, all with the aim of leading to a greener, more efficient future for the EU.

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- We see AI as a valuable tool that can significantly contribute to the EU's sustainable future and a tool to ensure the EU meets its climate goals under the 2015 Paris Climate Agreement and the EU Green Deal. We therefore believe that **public funding must be preferentially allocated towards climate-friendly projects and companies.**
- In addition, we recommend that the new Commission **introduces specific publicly funded programmes that contribute to the increased implementation of AI components in the energy sector** and to efforts to reduce CO2 emissions. In addition to specific and new public initiatives, we recommend a more integrated approach to existing initiatives and programmes addressing European Green Deal issues and AI-specific publicly funded programmes.
- Finally, quality data is needed to ensure the success and viability of these projects. From power grids and factories to cities and buildings, there is a lack of consistent data collection. We therefore urge the new Commission to **incentivise the collection and sharing of energy, climate, and electricity data across the EU** from both the private and public sectors. Furthermore, this data must be made available to the public, with companies obliged to make certain data, such as on energy consumption and flows, available to public authorities.



ACCEPTANCE BY SOCIETY

Unfortunately, perceptions of AI in the EU are often dystopian. Superhuman AGI (Artificial General Intelligence) may be fodder for film producers, but it is far from reality. Even before the release of ChatGPT, numerous AI-based applications such as Siri, translation services or in-car assistance systems have simplified the lives of many people without the AI component being recognised, and are part of our everyday lives with millions of Europeans as daily users.

Despite the increasing visibility of AI in our daily lives, a recent survey has revealed that

only 53% of Spaniards see more advantages than disadvantages in products and services that use AI, compared to 37% in Germany and 31% in France.²³ Furthermore, only around half of the German population has a good understanding of what AI is.²⁴ When asked about their trust in AI systems not being discriminatory or biased, Europeans expressed rather low levels of agreement, for example only about 33% in Sweden and 47% in Germany.²⁵

All in all, these figures are concerning. In order for the EU to become a leader in AI, it must not only increase the adoption of AI in the economy but also enhance visibility, create transparency, and bolster trust in EU-made AI.

Our Vision for the EU 2030:

KEY POLICY DEMANDS

- We believe it is crucial to **demystify AI and advocate for its ethical integration and broad acceptance in European society**. In order to dispel the existing dystopian views on AI, we believe that a targeted public outreach initiative is the most effective way to create the necessary trust. Such an initiative could include, for example, awareness-raising initiatives, the creation of publicly accessible labs, showrooms and information events.
- We also urge the next Commission to take action to **increase Europe's AI literacy**, for example by expanding the workshops and training already available through the EU's Digital Skills and Jobs Platform. Central to the realisation of this vision will be the provision of training for educators, workers and students across the EU.

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ABOUT

The **German AI Association** (*Bundesverband der Unternehmen der Künstlichen Intelligenz in Deutschland e.V.*) is Germany's largest industry association for Artificial Intelligence (AI) and represents around 450 innovative SMEs, start-ups and entrepreneurs focusing on the development and application of AI. We support AI entrepreneurs by representing their interests in politics, business and the media.

Our goal is an active, successful and sustainable AI ecosystem in Germany and Europe. After all, we can only compete globally if the brightest minds and visionaries decide to set up businesses, conduct research and teach in the European Union. Our members are committed to ensuring that AI technology is applied in accordance with European and democratic values and that Europe achieves digital sovereignty.

To achieve this, the European Union must become an attractive place for entrepreneurs to do business, where their willingness to take risks is valued and their innovative spirit is met with the best conditions.

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