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Response to the Request for Information on the Development of an Artificial Intelligence (AI) Action Plan

Introduction

DIGITALEUROPE appreciates the opportunity to provide input to the development of the US AI Action Plan.¹ AI represents a paradigm shift with deep implications for economies, societies and global innovation. DIGITALEUROPE believes in the shared benefits of the AI revolution and recognises the importance of fostering a coordinated approach to ensure AI's potential is fully realised.

Transatlantic collaboration on AI development is crucial for ensuring values-based economic growth and technological leadership. The EU and US have a shared interest in promoting AI innovation. A well-coordinated approach will help create interoperable regulatory frameworks, enhance trust in AI technologies and strengthen our collective resilience against geopolitical challenges.

As the US Administration shapes its new AI Action Plan, DIGITALEUROPE suggests focusing on the following key areas.

¹ <https://www.federalregister.gov/documents/2025/02/06/2025-02305/request-for-information-on-the-development-of-an-artificial-intelligence-ai-action-plan>.



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EU-US collaboration

AI models have an inherently global reach, with value chains that are globally integrated. It is therefore important to foster an interoperable approach to AI governance, focusing on common standards and terminology whilst respecting existing regulatory frameworks. Transatlantic collaboration on AI development is crucial for ensuring mutual economic growth and technological leadership vis-à-vis other geographies.

To continue developing the EU-US partnership, DIGITALEUROPE proposes the creation of an EU-US Critical and Dual-Use Technology Council, leveraging our combined strength in the tech sector. The Council should advance coordination on critical technologies like AI and cybersecurity, starting with dual-use applications, whilst enhancing the protection of our critical infrastructure through collaboration on data transfer and the development of international standards.²

Both the EU and US have announced significant investments in AI, with the EU's 'InvestAI' and the US 'Stargate.' Going forward, it will be crucial to maintain a dialogue on these investment initiatives, to establish effective communication channels as the programmes take shape. This is one of the topics where an EU-US Critical and Dual-Use Tech Council would provide real value.

² Over the past years, DIGITALEUROPE has been engaged in the EU-US Trade and Technology Council (TTC), publishing recommendations for, and participating in, TTC ministerial meetings.

Lastly, DIGITALEUROPE encourages international collaboration amongst AI institutes. Coordinated efforts will help align research, testing and guidance on AI.

G7 for global AI alignment

Next to bilateral EU-US cooperation, alignment with like-minded partners in the G7 is of paramount importance. As we reiterated in the Tech7 key recommendations for the AI Action Summit in Paris,³ G7 countries should work together to develop an interoperable, risk-based and consensus-driven approach to AI governance. DIGITALEUROPE supports the promotion of shared AI guidelines that can be adopted on a global scale on a voluntary and flexible basis.⁴

Export controls on AI advanced chips

The export control measures on advanced AI chips introduced by the previous US administration treat EU Member States unequally, and have created tensions in the transatlantic partnership.

Rather than introducing restrictive measures, the focus should be on fostering collaboration on mutual priorities. Both the EU and the US depend on one another for security and to remain competitive. This interdependence should be seen as a strength. As we highlighted in our recent statement, the EU as a whole must remain a trusted ally for the US.⁵

Standards

Standards play a strategic role in the uptake of new emerging digital technologies – such as AI, quantum, the metaverse and 6G – and in digitalising our economies and societies. Furthermore, standards can mitigate risks from exploitation of digital solutions, tools and products by malevolent actors.

The global standardisation of digital technologies is arguably even more critical – and more complex – than the standardisation of physical attributes such as electromagnetic compatibility, safety and radio. Several key factors must be considered.

³ Available at <https://cdn.digitaleurope.org/uploads/2025/02/TECH7-Joint-Statement-AI-Action-Summit-February-2025.pdf>.

⁴ DIGITALEUROPE is committed to continuing its engagement through the Canadian G7 Presidency, together with Tech7 associations from all G7 countries.

⁵ See DIGITALEUROPE's reaction to the US export controls on chips for AI, available at <https://www.digitaleurope.org/news/digitaleuropes-reaction-to-the-us-export-controls-on-chips-for-ai/>.

First, digital products such as AI usually have a much greater need of global interoperability than physical products. For full utilisation, interoperability and interconnectedness, globally accepted standards are vital (e.g. free data flow across borders) to increase choice, whilst decreasing costs for consumers. Digital products are almost always developed for global use.

Additionally, as digital products need to be globally interoperable, it is important to have all relevant and knowledgeable stakeholders included in the standardisation process, including international businesses.

Finally, digital products change very frequently, with some of them going through a nearly continuous development ('DevOps'). Therefore, there is a need to take *de facto* standardisation into account. Consensus-based standardisation and *de facto* standardisation will both be important – today and for the future.



Collaboration for AI use in critical infrastructure

Protecting critical infrastructure is a key component of a complete defence strategy. We encourage the development of AI-focused frameworks to minimise threats that might disrupt critical infrastructure such as energy and food production, water management, transportation and healthcare, amongst others.

Lawmakers on both sides of the Atlantic must advance policies that support the integration of AI in critical infrastructure, enabling innovation and securing key sectors against various threats, including cyber. Such policies should encompass robust frameworks that prioritise the security and resilience of essential services, including energy, transportation and healthcare. For example, strengthening transatlantic cooperation on health will be instrumental in advancing research efforts to combat pandemics and diseases whilst addressing interoperability and security challenges.

By fostering AI adoption in these sectors, policymakers can ensure that the EU and US not only safeguard their critical infrastructure but also set a global standard for AI-driven innovation. This concerted effort will necessitate comprehensive legislation that promotes investment in AI technologies, encourages public-private partnerships and ensures regulatory alignment to facilitate seamless collaboration and knowledge sharing.

Further AI-enabled cybersecurity collaboration between the EU and the US is vital for safeguarding critical infrastructure against an ever-evolving landscape of threats. By working together, both regions can leverage their combined expertise and resources to develop robust defence mechanisms that protect essential services such as energy, transportation and healthcare. Enhanced cooperation regarding the benefits of AI in cybersecurity, along with the threats, can lead to the exchange of best practices, real-time threat intelligence and coordinated

responses to cyber-attacks, thereby reducing vulnerabilities and ensuring the resilience of critical systems. This collective effort not only strengthens the security of individual nations but also establishes a unified front that sets global standards for cybersecurity in critical infrastructure, ultimately promoting stability and trust in the international community.



Defence collaboration

Transatlantic AI cooperation is essential in enhancing cybersecurity, operational efficiency and technological leadership in defence. To advance these objectives, DIGITALEUROPE recommends a number of key initiatives.

First, fostering EU-US collaboration on dual-use technologies is essential. Ensuring interoperability between AI-powered defence applications across EU and NATO partners would enhance collective security and operation effectiveness.⁶

Second, AI should be integrated into cyber resilience strategies for defence. Accelerating AI adoption in predictive maintenance, logistics and real-time battlefield analytics would enhance military readiness. Furthermore, supporting AI-driven cybersecurity solutions, military networks and cloud-based command systems is essential to all NATO allies.

Third, investment in AI applications in defence must be prioritised. DIGITALEUROPE calls for the allocation of 25 per cent of NATO institutional funds to AI-driven defence innovation and digital resilience. In the same vein, simplification of procurement processes and an increase in SME participation in AI-driven defence projects would foster innovation and strengthen the tech ecosystem in defence.

Additionally, addressing the AI skills gap in defence is critical. Expanding AI and cybersecurity training programmes for military and industry personnel will ensure a skilled workforce on both sides of the Atlantic.

Finally, whilst the EU AI Act does not regulate military applications, ethical considerations remain a key factor in AI for defence. Ensuring human oversight in AI-powered decision-making, particularly in autonomous systems and combat simulations, is essential to uphold international humanitarian law and prevent unintended escalation. The US should work closely with the EU to develop AI safety frameworks and ethical guidelines within the proposed EU-US Critical and

⁶ See DIGITALEUROPE, *Redefining defence innovation: An industry blueprint for NATO's Rapid Adoption Action Plan*, available at <https://cdn.digitaleurope.org/uploads/2025/02/DIGITALEUROPE-ROADMAP-FOR-NATO-FINAL-WEB.pdf>.

Dual-Use Technology Council, ensuring responsible AI deployment whilst fostering innovation and operational effectiveness.



Conclusions

DIGITALEUROPE remains committed to the advancement of AI development through EU-US and international cooperation. A transatlantic approach that aligns regulatory frameworks and fosters innovation will strengthen our collective ability to harness AI's transformative potential, notably in accelerating our defence collaboration and strengthening the security of critical infrastructure.

By working together, the EU, US and partners can establish a robust AI ecosystem that supports innovation, economic prosperity and societal wellbeing. DIGITALEUROPE is ready to support with further input, as we have done over the last years and remains ready to support the establishment of an EU-US Critical and Dual-Use Technology Council to advance these shared priorities.

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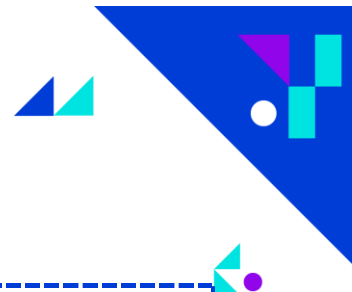
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About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory environment that enables European businesses and citizens to prosper from digital technologies. We wish Europe to grow, attract and sustain the world's best digital talents and technology companies. Together with our members, we shape the industry policy positions on all relevant legislative matters and contribute to the development and implementation of relevant EU policies. Our membership represents over 45,000 businesses who operate and invest in Europe. It includes corporations which are global leaders in their field of activity, as well as national trade associations from across Europe.