

Deliver EU digital competitiveness

The B9+ Group calls on the D9+¹ and EU policy makers to work with business to **deliver Europe's 'digital competitiveness'**² through **simplification of the EU rulebook**³; and **enable accelerated adoption and innovation within key digital technologies, including artificial intelligence (AI)**.

Europe is facing external and internal pressures. Geopolitical issues put pressure on Europe to swiftly deal with insufficient competitiveness to secure Europe's future. Being digitally advanced is a prerequisite for economic security and resilience⁴. **Despite some progress, there is an urgent competitive need to address significant gaps**⁵. However, **Europe's competitiveness is hindered by known internal structural pressures**⁶. These internal pressures are within the shared control of the EU and its Member States.

While acknowledging the importance of EU regulation in supporting trust and reflecting common European values, the EU has a complex digital rulebook⁷ which also presents challenges⁸ for business certainty, investment and innovation. The EIB reports⁹ that **Europe could bolster its digital leadership through market integration, [regulatory] simplification and targeted investment in innovation**. President von der Leyen¹⁰ and Professor Draghi¹¹ recently re-emphasised the urgency of regulatory simplification and AI transformation in Europe.

Quickly **addressing these internal pressures, while maintaining an open and ambitious digital trade agenda combined with a smart approach to economic security and resilience**¹², with an eye on relevant geopolitical developments, will help the EU to maintain a competitive edge, retain a seat at the table in global value chains, and navigate external pressures. **We urge the D9+ group to lead the EU's response**; intensify work to navigate Europe towards policies that attract investment and stimulate the digital growth and strength of Europe. **B9+ stands ready to support this work**.

¹ See Section 'About the B9+ Group' at the end of this document.

² This means to optimise conditions for investment and innovation that boost competitiveness across the EU's digital economy.

³ In line with EU/D9+ definitions and the Polish EU Presidency [paper](#) on regulatory simplification.

⁴ 2025 State of the Union Address by President von der Leyen

⁵ Eurostat (2025) [Use of artificial intelligence in enterprises](#); <https://hai.stanford.edu/ai-index/2025-ai-index-report> Top takeaway 2 Production of top AI models; and <https://hai.stanford.edu/ai-index/2025-ai-index-report/economy> Graph 3 Global Private Investment in AI

⁶ For example, the identified needs listed by Professor Draghi and the D9+ to: (1) address regulatory hurdles; (2) deepen the Single Market e.g., provide an integrated capital market to support our digital innovation ecosystem; and (3) enhance AI innovation and adoption in the EU. See (1) [Draghi Report](#) (2024) and Financial Times (2025) ["Forget the US – Europe has successfully put tariffs on itself"](#) (2) The D9+ Dublin Declaration was raised at Competitiveness Council (Internal market and industry), [24 May 2024](#).

⁷ https://www.bruegel.org/system/files/2024-06/Bruegel_factsheet_2024_0.pdf

⁸ FT (2025) [Denmark warns new EU red tape could cost €124bn a year](#)

⁹ [EIB \(2025\) Investment Report 2024/25](#)

¹⁰ [2025 State of the Union Address by President von der Leyen](#) "we need less paperwork, less overlaps, less complex rules"

¹¹ Draghi (2025) [Speech](#), High Level Conference – One year after the Draghi report

¹² This means open to further international co-operation and trade with likeminded partners, while encouraging capacities across Europe, so Europe can access and safeguard the economic benefits of further digital transformation. See BusinessEurope 2020, [Smart technological sovereignty: how it could support EU competitiveness](#) and [BusinessEurope \(2024\) Business views on a European economic security strategy](#).

This declaration expands on B9+ calls to D9+ and EU policy makers for urgent action on regulatory simplification and encouraging further AI adoption and innovation below.

1. Simplify the EU rulebook

Enable simple, workable, efficient and coherent regulation¹³. B9+ welcomes the EU simplification commitment and ongoing omnibus process. EU policy makers must take stock of existing inconsistencies, unclarities and overlaps (for instance reporting overlaps – follow the ‘once only’ principle) in addition to the concrete examples provided by businesses¹⁴ and take concrete action to deliver on a clear, predictable, coherent and implementable legislative framework; and identify concrete additional (‘Better Regulation’) actions to ensure regulatory coherence, predictability and reduce burden – now and in the future – to support our digital innovation ecosystem. Undertake an assessment (including on the economic and competitive impacts) of regulation and the interplay between regulations, set a high threshold (e.g. evidence-based necessity) for any proposed regulation (‘Better Regulation’)¹⁵. Avoid increased scope, inconsistencies, unclarities, overlaps, complexity and burden. Build in meaningful timely dialogue with business experts for the necessary reality checks. Focus on making the implementation of the rules easy (including providing harmonised clear and practical guidance and online implementing tools) and on enforcing existing rules to create a level playing field, reducing administrative burdens, and streamlining processes to support agile, innovation-friendly business environments. B9+ therefore calls for a robust impact assessment of the current framework and a high threshold for any new regulation to avoid costs confusion and fragmentation for European businesses.

Regulatory simplification must be an ongoing and due diligence process. It is a must-have and must not become a nice-to-have/once-off policy approach. Reduce administrative burden and cost. Ensure harmonised application of rules and compliance. Ensure detailed screening of entire sectoral European legislation in digital, as well as other sectoral policy to ensure coherent and long-term simplification. Remove administrative requirements that don’t enhance the protection of consumers/society. Promote innovation and competitiveness.

EU regulatory simplification will also need to be operationalised at Member State level. We support ongoing Member State efforts that support this EU simplification agenda. For example, meaningful industry engagement, the use of the AI Act sandboxes and the enablement of compliance with the help of online implementation tools, harmonized practical clear guidance and co-operation and co-ordination between national supervisors to avoid regulatory fragmentation.

Simplify the EU digital rulebook, including:

Data

¹³ This is a stated common ambition of the D9+, PL EU Presidency, EU and B9+

¹⁴ BusinessEurope(2025) [Simplifying the EU digital rulebook](#) illustrates a series of concrete examples to illustrate where and how (digital) regulation can and must be simplified to reduce the burdens that hold back European businesses. These examples and recommendations are supported by all B9+ members.

¹⁵ In line with D9+ Ministerial [calls](#) on April 19, 2024 and at the Competitiveness Council, [24 May, 2024](#).

- Safeguard and enhance security and trade secrets in the Data Act/Data Governance Act. Facilitate voluntary data sharing through the forthcoming Data Union Strategy. Reduce administrative burdens for the purpose of compliance.
- Modernise the e-Privacy directive¹⁶ and align with the GDPR.
- Explicitly recognise proportionality and a risk-based approach in the GDPR, especially in AI use. Further enable legitimate interest for AI innovation¹⁷. The EDPB opinion, while helpful, could be strengthened. A targeted clarification or a ‘white list’ that ensures legitimate interest can be relied on when data is processed with appropriate safeguards for: (a) product and service development and testing; and (b) security and cybersecurity measures would be welcome.
- Clarify the simplify the interaction between EU digital rules^{18 19}. Identify inconsistencies and overlaps in the digital rulebook and ensure these are removed. Provide harmonised guidelines on how the EU digital rules interact and their interplay with GDPR. Ensure harmonisation of legal terminology to increase clarity.
- Encourage data flows and digital trade. We acknowledge the continued importance of adequacy, but implementation could be made simpler e.g., better recognition of intra-company transfers during general business²⁰; guidance that enhances business certainty on international data transfers to non-EU (‘third’) countries²¹.
- Ensure alignment with established international standards in developing technical specifications and implementing acts. Establish Mutual Recognition with international certification bodies and digital identity frameworks, allowing providers to build upon existing global certifications rather than replacing them. This approach strengthens the EU's position in global markets while ensuring high security standards and innovation, and reducing regulatory barriers.

¹⁶ For example, targeted amendments to Article 5(3) of the ePrivacy Directive to create clear exemptions from the consent requirement for specific, legitimate purposes. This includes using on-device data for essential activities like security, analytics, and displaying contextual advertising.

¹⁷ Article 6(1)(f) and security (Recital 47) and Recital 4 of GDPR

¹⁸ This can include interactions between Data Act, DMA, AI Act, DSA and GDPR.

¹⁹ BusinessEurope(2025) [Simplifying the EU digital rulebook](#) illustrates a series of concrete examples to illustrate where and how (digital) regulation can and must be simplified to reduce the burdens that hold back European businesses. These examples and recommendations are supported by all B9+ members.

²⁰ A positive presumption for such transfers could be made when the company has self-certified adherence to appropriate safeguards.

²¹ Note, new guidance has been developed in France and in some D9+ countries e.g., CNIL in France (2025) Guidance on data transfer impact assessments. Danish DPA updated its guidance in 2024; and the Luxembourgish DPA (2025).

AI

- Provide further clarity on definitions in the EU AI Act. Support legal certainty and reduce risk to foster investments and innovation.
- Apply high-risk requirements *after* relevant harmonised standards are published, allowing sufficient time for adaptation. We propose application of essential requirements 12 months after the relevant standard is published. Re-align the application of the AI Act timeline with the delivery of key implementation tools.
- Reduce administrative requirements for AI that do not proportionately increase the protection of consumers or society. Reduce the requirement to register proven non-high-risk AI systems²². Most systems will not qualify as high-risk in practice (the European Commission had envisioned that 15% of AI systems would fall within this high-risk category. It is important that there is no scope creep). This requirement is an administrative burden that impacts innovation/adoption and offers little in terms of risk management or transparency.
- Implement the AI Act - including through codes of practice and guidelines - with rigorous focus on the EU's overarching goals of fostering and accelerating the application of AI across industries before considering new legislative changes.
- Ensure the AI Act, its codes of practice, guidelines and standards are firmly grounded in the AI Act's legal basis and avoid any overlap, inconsistencies or conflicts with other existing regulations.

Cybersecurity and resilience

- Avoid duplicate reporting obligations and apply the “once-only” principle. Create single national entry points for incident & cybersecurity reporting (including GDPR).
- Introduce common reporting templates.
- Encourage controlled sharing of sensitive information.
- Increase meaningful stakeholder participation in the certification process²³.

²² Article 49 of the AI Act

²³ Certification schemes should be non-discriminatory, technically feasible, and future-proof. Certification frameworks should be supported by mutual recognition with national and international frameworks

2. Enable and leverage AI adoption and innovation

Build foundational and competitive positions in key digital technologies²⁴ and necessary infrastructure. This means Europe must make and/or enable complementary investments by the public and private sector into compute infrastructure²⁵; digital²⁶ and energy networks; the research and innovation nexus; and digital and AI skills – the foundations of a thriving digitalised economy²⁷. Specifically:

- **Refrain from outbound investment screening** as this would harm an open investment climate, could trigger counter measures effecting the single market and limit European companies in getting access to important digital technologies.
- **Develop risk-based regulatory approaches** that enable continued access to industry-leading technologies from partner countries.
- **Foster a competitive landscape through open scientific innovation.** Enabling many diverse, overlapping technology development ecosystems, including open and proprietary models, is critical for competition, a vibrant AI ecosystem and for transparent and safe governance of AI throughout its lifecycle. Choice and flexibility allow users to deploy a variety of AI models and move their data and applications across multiple environments.
- **Facilitate the step up in private investments that is required to secure the availability of state-of-the-art networks²⁸** including Gigabit-access for end users, and development of 5G/6G and cloud-/edge infrastructure.
- **Encourage investment in sustainable data centres. Enhance long-term grid planning, streamline permitting processes, and modernize the transmission infrastructure** to meet electricity demand and ensure grid reliability to support the pace of the digital transition.
- **Accelerate the European AI research, innovation and deployment nexus.** Leverage the Apply AI and AI in Science Strategies. Align the AI Factories, European Digital Innovation Hubs (EDIHs), research institutions and regulatory sandboxes to build strong AI ecosystems; enable business adoption and innovation; and reduce administrative burdens and fragmentation.
- **Invest in digital and AI skills.** Allow for an EU-wide competence framework and certification system.
- **Ensure the EU is taking active part in international standardisation setting** on strategic topics e.g., G7 and OECD governance initiatives. Promote and adopt international standards to ensure harmonised and interoperable regulation.
- **Engage and support digitalised business to start, scale and stay in the EU.** Overcome hurdles such as limited access to capital²⁹, regulatory challenges, and talent acquisition, that are crucial for digital only companies and upscaling. Support and enable more European success stories in entrepreneurship and innovation and to promote their

²⁴ For example, AI, advanced semiconductors and quantum computing

²⁵ Quantum/High Performance Computing and Semiconductors.

²⁶ Connectivity and Cloud.

²⁷ All of these proposals are expanded on in the B9+ Amsterdam Declaration, 21 March 2025

²⁸ https://www.buinessurope.eu/sites/buseur/files/media/position_papers/internal_market/2024-09-27_reaction_to_the_white_paper_how_to_master_europes_digital_infrastructure_needs.pdf

²⁹ Deliver an integrated capital market. Mobilise funding boost access to capital.



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competitiveness globally. Share best practices to enable learnings from successful digital unicorns.

- **Simplify and align the different European funding programmes to prioritise AI innovation, industrial leadership and competitiveness.** Set ambitious targets for funding AI innovation and adoption across all relevant EU programmes especially when contributing to competitiveness, sustainability and security goals. Maximise public investment and ensure it is used as effectively as possible.

Declaration Signatories



About the B9+ Group

The D9+ is a Ministerial forum of likeminded and digitally progressive EU Member States. The B9+ Group is a grass-roots coalition of the main national business confederations of 12 D9+ Member States: CEOE (Spain), VBO-FEB (Belgium), SPCR (Czech Republic), DI (Denmark), EE (Estonia), EK (Finland), Ibec (Ireland), FEDIL (Luxembourg), VNO-NCW (Netherlands), LEWIATAN (Poland), CIP (Portugal) and Confederation of Swedish Enterprise (Sweden).

The B9+ has had longstanding engagement with the D9+³⁰. The D9+ initiative is important to business in the B9+ countries and the broader EU, and we encourage its further development.

*The B9+ Vision for a Digital Europe, 2024-2029*³¹

A Europe that can access and safeguard the economic benefits of further digital transformation:

1. By being open to international co-operation and trade while encouraging capacities across Europe³².
2. From a strong and effective internal market.
3. Securing competitiveness and resilience with strong business conditions and digital capacities to connect, adopt, innovate and trade.

³⁰ Link [here](#) to the B9+'s long-running work (policy declarations, position papers and declarations) with the D9+.

³¹ B9+ (2024) [A Digital Europe – Open, Competitive and Resilient](#) B9+ vision and priorities for D9+ and EU policymakers for a Digital Europe, 2024-2029

³² This means open to further international co-operation and trade with likeminded partners, while encouraging capacities across Europe, so Europe can access and safeguard the economic benefits of further digital transformation. See BusinessEurope 2020, [Smart technological sovereignty: how it could support EU competitiveness](#) and [BusinessEurope \(2024\) Business views on a European economic security strategy](#).