

Position Paper

2025 June

EU Apply AI Strategy

Summary

As Germany's digital industry association, we support the EU's Apply AI Strategy as an important step to help bring artificial intelligence into real-world use across key sectors. Many of our members, ranging from startups to large enterprises, are working on AI solutions, and we see the potential for AI to make a positive difference in industry, public services, and research.

Key Priorities for a Successful Apply AI Strategy

- **Improve Access to Compute and Data:** AI applications need powerful computing infrastructure and high-quality data. We fully support open access to AI Factories and Gigafactories, especially for small and medium-sized companies. These facilities should provide compute power, tools, and access to relevant datasets and talent. In parallel, Europe needs interoperable and trustworthy data spaces to support AI training and deployment.
- **Make AI Regulation Clear and Practical:** AI regulation should support innovation and not slow it down. We support an innovation-friendly and flexible governance approach that helps companies apply AI in real-world settings. Regulatory sandboxes should be available in all Member States, coordinated at the EU level. Using global standards will help reduce complexity and make it easier to bring European AI solutions to other markets.
- **Attract and Keep AI Talent in Europe:** Many companies in Germany and across Europe are struggling to find skilled AI professionals. We propose easier visa processes, recognition of qualifications across borders, and startup-friendly rules that make it easier to offer stock options and attract talent.
Education on AI should begin early in schools and universities. We therefore call for additional, AI-specific programs within Erasmus+ that allow students and young professionals across Europe to learn about AI, exchange experiences, and collaborate. These initiatives should promote cross-border understanding of technological developments and help foster a new generation of digitally skilled Europeans. The goal is

to strengthen innovation, build ultra-fast, reliable and secure networks, and deepen cooperation within the European AI ecosystem.

- **Harness AI to Strengthen Europe's Core Sectors and Values:** Europe has unique strengths in sectors like healthcare, mobility, energy, manufacturing, and public services. These areas should be at the heart of the Apply AI Strategy. AI can help improve quality of life, increase efficiency, and support sustainability, while reflecting European values such as privacy, fairness, and democratic accountability. Edge AI should play a central role in this effort, as it is particularly suited for applications that require real-time decision-making in these key sectors. It aligns closely with core European values: by enabling local data processing, Edge AI reduces latency and improves system resilience (efficiency), significantly lowers energy consumption (sustainability), and minimizes data transmission (privacy). Europe is also well positioned in essential Edge AI technologies, such as semiconductors, where sufficient supply is ensured by European suppliers and has global competitiveness. As a policy recommendation, regulatory sandboxes specifically tailored to Edge AI could bring together stakeholders across the value chain, lower barriers to adoption, and help identify where regulatory adjustments may be needed.
- **Open Source AI as a Driver of Innovation and Competitiveness:**
To drive innovation and strengthen the European AI ecosystem, Open Source AI should face minimal regulatory barriers. Public projects should prioritize its use to enhance transparency and ensure long-term public value. A clear and comprehensive definition of Open Source AI is needed, covering access to model weights, data, licensing and core algorithms. The AI Act should apply consistently across sectors while avoiding duplicate rules. A proportionate approach will reduce legal uncertainty and allow companies to focus on innovation rather than compliance.
- **Enabling and Supporting Scalable and Efficient AI Integration:** AI development should support the use of small, optimized models that can run on lightweight chipsets and control units not just in large server environments. Promoting fine-tuning and model adaptation will enable more flexible and cost-effective applications across industries. This approach lowers production costs, boosts innovation, and strengthens the global competitiveness of European technology providers. Accelerating the adoption of AI technologies is vital for the European industry. The EU should create targeted incentives, such as innovation grants and AI-specific funds to drive the integration of trustworthy AI solutions across all stages of the industrial value chain.
- **Strengthen the Role of EDIHs:** European Digital Innovation Hubs (EDIHs) can help businesses and public institutions test and adopt AI. To be effective, these hubs need long-term support and strong connections across Europe. They should not only offer technical help, but also provide legal advice, training, and matchmaking services that are tailored to the needs of different sectors like healthcare, energy, or manufacturing.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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