

Implementing an open European digital future

Ibec response to the European Commission White Paper on Artificial Intelligence

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Key Messages

The shape of Europe's digital future matters. Ibec envisage a more competitive, smarter low carbon economy, with a sustainable enterprise base that provides quality jobs and enables a high quality of life. We envisage an outward looking, dynamic and successful EU, that provides the conditions for organisations and individuals to adapt to technological change and reach their full potential. Under the right conditions, Artificial Intelligence (AI) are a suite of transformative technologies or systems that can enable that vision. Developing a strong European data economy and ensuring excellence and trust are crucial to that success.

Key recommendations on White Paper on Artificial Intelligence

- The outcome of the EU approach must speed up not slow down Europe's capacities in data innovation and data application.
- The shared ambition of the EU and its Member States must be to lead on further digital development, including AI development and adoption. Europe's digital frontrunners should seek to bring along other Member States, share best practice and build an inclusive agenda that ensures a rising [digital] tide raises all boats. Europe must enable and champion further digital and data innovation, enterprise and trade.
- Play to strengths and realise opportunities. Further develop a coherent European ecosystem that enables our public sector, our private sector and individuals to invest, adopt, innovate and succeed with AI, bringing benefits for all.
- Work with Member States. Revise the EU's Co-ordinated Plan on AI to enhance commitment and coherence in approach. Deliver the investment promised in the next long-term EU budget to support the desired ecosystem of excellence in AI.
- Focus efforts in research and innovation. Increase investment and intensify collaboration between government, regulators, enterprise and the research community in developing Europe's AI research and innovation ecosystem.
- Enable everyone to accomplish more through the right knowledge, training and skills. We support investment, education and inclusion in helping organisations¹ and individuals prepare for AI adoption.
- Enable smarter entrepreneurship. The implementation of AI-based solutions across all sectors is where the real economic benefits will be found.
- The proposed partnership with the private sector should be open and have clear structures for leadership and co-ordination; a clear vision of purpose and objectives; and the necessary funding for delivery.
- The public sector should act as a catalyst for enabling further cross-border and cross-sectoral digital opportunities and raising Europe's collective digital performance.
- Invest in digital and data infrastructure.
- Shared global standards, including ISO, in emerging technologies will further enable trust, fair competition and avoid market distortions.
- Take a principled and proportionate approach to AI governance and laws that apply to AI that is based on sound, clear principles, evidence and risk. Harness existing regulatory frameworks where possible.

¹ For example: Government, public sector, private sector (of all sizes), sectoral regulators and educators

Introduction

The shape of Europe's digital future matters

Ibec², Ireland's business group, welcome the publication of the European Commission's Communication, 'Shaping Europe's digital future', as bringing a necessary focus to the importance of: digital leadership; enabling further development of our digital capacities; and championing further digital and data innovation, enterprise and trade. Ibec and its members have outlined nine policy recommendations across these three priority areas to EU policy makers and influencers. We envisage a Europe that provides the ambition and tools to enable its Member States, businesses, innovators and citizens to lead and succeed in the local and global opportunities offered by further digital transformation, enabling further innovation, quality jobs, better services and enhanced well-being in period 2020-2024³.

Excellence and trust in artificial intelligence (AI) matters

Our vision of a future Ireland is for a more competitive, smarter low carbon economy, with a sustainable enterprise base that provides quality jobs and enables a high quality of life for its citizens. An inclusive Ireland at the heart of an outward looking, dynamic and successful EU, that provides the conditions for organisations and individuals to adapt to technological change and reach their full potential. Under the right conditions, Artificial Intelligence (AI) are a suite of transformative technologies or systems that can enable that vision. Ibec and its members have outlined policy recommendations to policy makers and influencers on the future European approach to AI⁴ and our national AI strategy⁵. These include the delivery of physical and data infrastructure and enabling governments, public and private organisations and individuals to further collaborate, innovate and succeed with AI. We envisage national AI strategies evolving, aligned with EU initiatives and globally relevant standards for interoperable and trustworthy AI, that enable governments, organisations and individuals across the EU to: embrace innovation and technological change; address policy issues of strategic importance; deliver quality jobs and enhance well-being in period 2020-2024.

A European data economy matters

For Europe to 'become a global leader in innovation in the data economy and its applications' it will need access to quality data in quantities that may exceed those held by individual businesses or public bodies. The EU needs an overarching, market-friendly data strategy to enable further digital transformation of its economy and society.

In this context, Ibec and its members welcome the opportunity to contribute to the Commission's public consultations on further shaping Europe's digital future, specifically in the areas of AI⁶ and data⁷. This paper outlines Ibec views on the Commission's White Paper on AI. Ibec has also developed a separate response to the proposed European strategy for data.

² www.ibec.ie/digitalpolicy

³ Ibec (2019a) Europe's digital future – open for business, <https://www.ibec.ie/connect-and-learn/insights/insights/2020/02/07/europes-digital-future-open-for-business>

⁴ Ibec (2019a) Ibid.

⁵ Ibec (2019b) Smarter technology for a better future, <https://www.ibec.ie/connect-and-learn/insights/insights/2020/02/20/smarter-technology-for-a-better-future>

⁶ European Commission (2020a) White Paper on Artificial Intelligence – A European approach to excellence and trust, COM (2020) 65 final

⁷ European Commission (2020b) Communication - A European strategy for data, COM (2020) 66 final

Views on EU White Paper on Artificial Intelligence

General comments on proposed approach

Aim of the proposed approach

The Commission's stated aim is for Europe to 'become a global leader in innovation in the data economy and its applications' benefitting citizens, business and the public interest.

Digital leadership is critical to Europe's future economic success and well-being. Despite progress, the European Union and Ireland face intense and growing global competition in the pace and level of our digital transformation. The ability to capture the opportunities from AI may vary between EU Member States, sectors, large and small firms. Embracing further technological change, such as AI, presents both opportunities and challenges across several economic and social domains. Concerns have been raised in relation to the disruption of certain sectors, jobs displacement, safety and the protection of rights. In this context, public policy has an important role in ensuring the potential benefits of AI and digital automation can be realised and potential risks mitigated through ambitious planning and implementation.

EU policy makers can play a key leadership role in preparing Member States, organisations and individuals for further technological change. In this context, the shared ambition of the EU and its Member States must be to lead on further digital development, including AI development and adoption. Europe's digital frontrunners should seek to bring along other Member States, share best practice and build an inclusive agenda that ensures a rising digital tide raises all boats. Europe must enable and champion further digital and data innovation, enterprise and trade.

Playing to strengths and realising opportunities

Ibec believes that the EU and Ireland are well placed to realise the significant opportunities that AI offers our economy and well-being⁸. However, this will only happen with further commitment by the European institutions, Member States, business, innovators and citizens to engage, collaborate and build on Europe's comparative strengths⁹, not just in regulation. We need to further develop a coherent European ecosystem that enables our public sector, our private sector and individuals to invest, adopt, innovate and succeed with AI, bringing benefits for all.

⁸ Ibec (2019a and b) Ibid.

⁹ For example, ICT, healthcare biopharmaceuticals and medical technology, agri-foods, financial, business services, utilities and potential GovTech offerings.

Specific comments on proposed approach

Ecosystem of excellence - promoting AI development and uptake

The six actions proposed in Section 4 of the White Paper¹⁰ are very important and welcome. They can contribute to the development of the supply and demand capacities necessary to enable further AI adoption and innovation across Member States, public services, researchers, businesses of all sizes.

Working with Member States

A revision of the EU's Co-ordinated Plan on AI¹¹ will be necessary to take onboard the outcomes of this public consultation and the AI-HLEG¹² pilot of its assessment list for trustworthy AI¹³.

Recommendations

Working together should:

- Enhance commitment and coherence between the Member State approaches. It is important that not only are all national AI strategies completed, but that they act in concert with the revised Co-ordinated Plan. At the end of February, there were 15 national AI strategies, with a further 7 at draft stage and 5 in progress across the EU Member States¹⁴.
- Intensify the pace and level of Europe's collective digital performance by demonstrating success stories, avoiding duplication and inefficiencies, building trust in digital transformation and deepening collaboration between front runners and weaker performers in building a shared and inclusive agenda.
- Deliver the investment promised in the next long-term EU budget to support the desired ecosystem of excellence in AI¹⁵.

Focussing efforts in research and innovation

Ibec supports increased investment and intensified collaboration between government, regulators, enterprise and the research community in developing Europe's AI research and innovation ecosystem. The proposed actions (4A, 4C and 4E¹⁶) in the White Paper are all very important and welcome.

Recommendations

Given the stated urgency of the White Paper and the need to build further momentum:

- Prioritise the PPP for industrial research and the co-ordination of existing AI research excellence centres in the short-term with clear structures for leadership and co-ordination; a clear vision of purpose and objectives; and the necessary funding for delivery. The proposal to create a lighthouse centre is an excellent initiative that could help, although it is vital to strike the right balance in the degree of centralisation. A single institute spread across

¹⁰ Promoting AI development and adoption by working with Member States; focusing research and innovation; developing skills; focusing on SMEs; PPPs and promoting public sector adoption.

¹¹ <https://ec.europa.eu/digital-single-market/en/news/coordinated-plan-artificial-intelligence>

¹² <https://ec.europa.eu/digital-single-market/en/high-level-expert-group-artificial-intelligence>

¹³ <https://ec.europa.eu/futurium/en/ethics-guidelines-trustworthy-ai/register-piloting-process-0>

¹⁴ European Commission (2020c) Presentation 26 February, 'White Paper on AI – A European approach to excellence and trust'.

¹⁵ The European Multiannual Financial Framework (MFF), for the 2021-2027 period

¹⁶ Establishment of an AI 'lighthouse' research centre; network of existing AI research excellence centres; PPP for industrial research.

several locations in a number of Member States could be a good model. If adopting a hub and spoke model, it will be important to ensure that resourcing is allocated in a sensible manner.

- Invest further in applied data research, supporting our innovators and enterprise through development and real-world testing of new digital applications. Europe is successful in research output in AI. However, there is more to do in linking this to delivery of business needs and in co-ordinating efforts between Member States. Ensure further alignment between EU innovation and industrial policy. Use regulatory sandboxes to test and scale up research as appropriate. Enable shared learning between innovators, enterprise and regulators. This should make it easier to launch and scale further digital innovation across Europe.

Skills

The planned reinforcement of the Commission's skills agenda and the planned support of a network of education institutions offering world-leading masters programmes in AI are welcome. The eventual EU approach should enable everyone to accomplish more through the right knowledge, training and skills. We support investment and inclusion in helping organisations¹⁷ and individuals prepare for AI adoption. In parallel, there is a similar educational challenge to equip those in the wider ecosystem who will play crucial supporting roles in guiding the uptake of AI. Information will need to be delivered at citizen and enterprise level so that there is an understanding of the potential benefits and risks inherent in the ecosystem.

Recommendations

For consideration and in working with Member States:

- Co-ordinate initiatives across the education system from primary to postgraduate, apprenticeships and alternative pathways to gain the relevant STEAM and transversal skills to embrace AI and digital automation.
- Encourage cross-faculty collaboration between computer science and other enterprise-focussed academic fields to develop the indigenous pipeline of enabled AI talent.
- Develop the indigenous pipeline of AI practitioners. Explore apprenticeship opportunities across the economy where graduates with AI or relevant knowledge are encouraged to employ that knowledge to real world challenges in the public and private sector across the EU.
- Embed an inclusive and lifelong approach to the development of skills for a digital age. Enable governments, public and private organisations, educators, workers and jobseekers to keep pace with technical change through upskilling and reskilling as necessary.
- Work with employers to manage digital transformation in the workplace. Employers will need to facilitate new ways of working. Public policy on childcare, lifelong learning, technology fulfilment of roles, retirement, pensions and taxation must keep people engaged in the labour market in a way that doesn't discriminate or disincentivise work.
- Deploy appropriate supports to people whose current jobs may be transformed or eliminated by technological change, with a focus on training, career guidance and social safeguards.

¹⁷ For example: Government, public sector, private sector (of all sizes), sectoral regulators and educators

- Promote the EU as a location for mobile AI talent.
- General awareness and understanding of AI should be promoted too. While digital skills will be important to our workforce, this aspect is important for all citizens and inclusion in an AI-empowered economy and society.
- Provide appropriate education and supports for those regulating and enforcing laws regarding the use of AI across various sectors, so that the legal infrastructures and citizen rights are robust and proportionate.
- Provide appropriate education regarding the regulatory environment for innovators and educators regarding the use of AI across various sectors, to foster trust and understanding, and avoid unnecessary setbacks through a lack of understanding of the relevant laws or failure to comply with such laws.

Focus on SMEs

The proposed actions (4D¹⁸) for SMEs and start-ups are very important and welcome. The EU approach must enable smarter entrepreneurship. The implementation of AI-based solutions across all sectors is where the real economic benefits will be found.

Recommendations

- Focus on enhancing comparative strengths.
- Encourage enterprise in developing, adopting and deploying AI applications. Different sectors, organisations and individuals may be at different stages in their understanding and adoption of AI. Some may lack awareness of the opportunities from AI, while others may require support in the development and deployment of AI applications. A big challenge for smaller firms will be in assessing what technologies to adopt and how to deploy them. We must resource the response accordingly.
- Leverage the EU Digital Innovation Hub (DIH) network further. Develop a coherent network that is enterprise led. DIHs should support further awareness, development, collaboration and deployment of digital applications across the European economy for small and big firms alike.

Partnership with the private sector

The proposed actions (4E¹⁹) for private sector collaboration are very important and welcome. Without enterprise-driven AI, the EU will not be able to add value to ongoing research in AI and lose out to competitors.

Recommendations:

- The PPP should have clear structures for leadership and co-ordination; a clear vision of purpose and objectives; and the necessary funding for delivery.
- Access to participate in the PPP should be open and non-discriminatory.

¹⁸ Raising SME awareness of AI benefits; SME access to testing/reference centres; knowledge transfer to SMEs; collaboration between SMEs larger firms and academia on AI; and access to equity financing for start-ups.

¹⁹ New PPP in AI, data and robotics to co-ordinate research and innovation; collaborate with other relevant PPPs; and work with testing facilities and DIHs.

- Information should flow from the PPP to enrich and facilitate agile development.

Promoting AI adoption by the public sector

The proposed actions (4F²⁰) for private sector collaboration are very important and welcome. AI offers an opportunity to enhance public services. There is also an opportunity for the public sector to act as a catalyst for enabling further cross-border and cross-sectoral digital opportunities and raising Europe's collective digital performance.

Recommendations

- The EU and its Member States should aim to lead on online Government services and the digitalisation of public service delivery.
- Intensify the development of GovTech ecosystems in Member States and across the EU.
- Further develop institutional capacities and public-private partnerships (PPPs) to realise identified opportunities for online Government services and digitalised public service delivery for organisations and citizens. Deliver the Tallinn Declaration on e-Government.
- Intensify work on open data. Define and extend the range of high value datasets that the public sector will make available in promoting further digital innovation. Enhance transparency, promote further business creation and innovative public services.
- There are opportunities for governments themselves to benefit from the use of AI in their operations. AI has the potential to help public sector agencies respond faster and with greater nuance to citizen queries. In addition, by showcasing how AI can be practically and sensitively applied, government could help to lead the way as role models.

Digital and data infrastructure

Access to computing and data infrastructure will underpin efforts to develop Europe's capacities in AI²¹. Beyond the necessary digital infrastructure, the quantity, quality and type of data available are important to the successful development and deployment of AI. The development of a European data space requires commitment by Member States.

²⁰ Sector dialogues on healthcare, rural administration and public services.

²¹ Proposed actions are in the parallel Commission data strategy. Ibec has developed a separate response to this.

International aspect

Further EU engagement with its international partners can deepen our mutual understanding of the opportunities, risks and may overcome shared technical and policy challenges in further digital transformation. Shared global standards in emerging technologies, including ISO, will further enable trust, fair competition and avoid market distortions.

Recommendations

- Develop industry-led standards ‘bottom-up’, using the following principles: inclusiveness, consensus, transparency, effectiveness, technology, neutrality and impartiality. This will ensure we can encourage and benefit from trustworthy AI outside the EU but also that AI developed within the EU can move across borders easily.
- Facilitate cross-border data flows and prevent forced data localisation measures. Ibec like several European business groups and likeminded Member States, support EU legislation to remove unjustified restrictions to the free flow of data. We don’t agree that AI trained on non-European data would throw up different results to that trained on EU data in every context.
- Intensify the use of free trade agreements (FTAs) and mutual adequacy decisions as a vehicle to promote further (bilateral) digital trade and cross-border data flows; and to address digital protectionism without prejudice to EU data protection rules.

Ecosystem of trust – proposed regulatory framework

Regulatory concerns

Embracing further technological change, such as AI, presents both opportunities and challenges across several economic and social domains. Concerns are raised in the White Paper in relation to the protection of rights, explainability, safety and liability. In this context, public policy has an important role in ensuring the potential benefits of AI and digital automation can be realised and potential risks mitigated through ambitious planning and implementation.

Regulatory approach

Ibec support a principled and proportionate approach to AI governance that is based on evidence and risk. We broadly welcome the regulatory approach proposed in the Commission's White Paper. There are already many regulations and legal codes that are technology neutral in nature, and thus already apply to AI, but it is worth evaluating if there are gaps in the context of specific demonstrable risk. Any gaps identified should be addressed via practical, principles-based rules which build on existing legislation, and address demonstrable high risk, to avoid creating overly complex or conflicting legal obligations. Consultation with the various interested groups prior to introducing new laws is key to success in this area.

Recommendations

- Take a human-centred approach²² to the governance and regulation of AI development and adoption. Specifically:
 - Help Member States, organisations and individuals to contextualise and operationalise EU²³ and OECD principles²⁴ in the development and deployment of 'trustworthy AI'²⁵ powered solutions across several domains.
 - Protect values (including human dignity and fundamental rights, freedom, democracy, equality and justice) and enable business to add value – innovation and enterprise are human endeavours that can enable higher standards of living across the EU.
 - The opportunity cost of not using AI is not sufficiently reflected in policy debates. When considering the risks of AI, it is vital to acknowledge there are also flaws in existing (non-AI) approaches. We should compare the risks of using new AI systems against existing approaches. If an imperfect AI system were shown to perform more accurately than the status quo at a crucial life-saving task, for example, it may be irresponsible to not use the AI system, notwithstanding its inherent risk.

²² Approach outlined by the European Commission's High-Level Expert Group on AI ('AI HLEG') and OECD that encourages beneficial outcomes from AI for both humans and the planet that sustains them. This approach encourages a respect for law, human rights and democratic values as well as a consideration for the natural environment and sustainability.

²³ European Commission High Level Expert Group on AI or 'AI HLEG' (April, 2019) Guidelines for trustworthy AI (<https://ec.europa.eu/digital-single-market/en/news/ethics-guidelines-trustworthy-ai>). Update to AI HLEG assessment list expected in June 2020.

²⁴ OECD Council Recommendation (May, 2019), OECD Principles on AI (<https://www.oecd.org/going-digital/ai/principles/>)

²⁵ Trustworthy AI is lawful, ethical and robust throughout its lifecycle. It requires transparency and accountability by organisations who deploy or use AI.

- Harness existing regulatory frameworks in AI governance.
Specifically:
 - Assess the need for new regulation against existing regulation. Many of the concerns raised in the White Paper are addressed by applicable EU legislation, for example GDPR, however current legislation may have some gaps. Given the range of AI systems and sectoral applications, existing EU rules should be reviewed against AI-related concerns and requirements.
 - Where regulatory or governance gaps are identified, we favour a response that is evidence-based, technology-neutral, proportionate and outcome-based. An outcome-based approach is favoured as the rate of technological and behavioural change can often outpace policy and regulatory processes. This can risk undue regulatory burden or obsolescence. Secondly, given the urgency expressed in the White Paper the key focus must be outcomes that speed up Europe's engagement with AI.
- Take a risk-based approach to AI governance. The heterogenous nature of AI and its applications means a one-size-fits-all legislative approach would be problematic or risk stifling the desired opportunities. Policy makers and stakeholders should work together to define any further appropriate safeguards needed for sensitive use cases whilst continuing to encourage innovation.
Specifically:
 - The proposed introduction of new compulsory requirements limited to 'high-risk' applications is useful as it aims to ensure a targeted and proportionate approach.
 - The two cumulative criteria²⁶ proposed in determining high-risk are helpful but more nuance and proportionality should be added to the risk assessment criteria to make it easier for companies to understand when their technology may fall into this category.
 - The Commission should better reflect well-established interpretations of risk, reflect wider operational context when assessing risk, and factor in the opportunity cost of not using AI in the definitions/criteria.
 - Ensure the criteria of high-risk at a principles level are evidence-based, coherent, clear and future-proof.
 - Ensure any advisory committee involved in identifying risk should involve industry and sectoral participation.
 - Ensure consistency in approach for different applications in different sectors or intersectoral applications. Avoid risk of different and overlapping rules.
 - Ensure the legal definition of AI is clear and reflects both EU and OECD thinking²⁷. Such an approach will allow Europe to lead in facilitating further digital trade and internationalise trustworthy AI. Care should also be taken to ensure that the definition is focused on actual AI and is not conflated with any software. The "exceptional instances" clause is too open-ended and should be removed as it creates legal uncertainty.

²⁶ Based upon sectors and intended applications deemed to pose a high-risk to rights or safety.

²⁷ European Commission High Level Expert Group on AI or 'AI HLEG' (2019) and OECD Council Recommendation (2019), OECD Principles on AI. It should be noted that the European Commission participated in the development of the OECD principles.

- Ensure secure, trustworthy AI through a combination of ex-ante²⁸ and ex-post²⁹ mechanisms. For the vast majority of applications conformity assessment may be best done on a self-certified ex-ante basis with ex-post third party market surveillance to ensure compliance. Checking every system by a third party before it comes to market may be impossible regarding regulators resources and would hamper innovation. For some higher risk AI applications, third party ex-ante conformity assessment may be required.
 - Ensure extensive and meaningful engagement between actors across the AI value chain and relevant competent authorities to develop the assessment (including self-assessment), compliance and enforcement mechanisms to achieve shared outcome of trustworthy AI.
 - Consider SMEs and start-ups requirements in the development of the mechanisms as well as support in implementation of the mechanisms.
 - Consider the lessons from the AI HLEG pilot outcome in the development and implementation of the mechanisms.
 - The assessment regime must be pragmatic, well-resourced and transparent to ensure it is not overly burdensome for application providers, and also practical for designated assessment bodies to deliver, taking into account the level of expertise (sectoral and AI specific) and resourcing required to implement in a timely fashion.
 - Ensure an international outlook in the development and implementation of mechanisms. Consider relevant international standards and developments at OECD level. Avoid fragmentation of the international AI market to the detriment of EU business and citizens.
- Safety and liability legal frameworks should continue to ensure that all products and services, including those integrating emerging technologies, operate safely, reliably and consistently and that damage having occurred is remedied efficiently. Specifically:
 - Ensure an environment that adequately protects rights, values and assets³⁰, while providing an effective framework to invest further in innovative digital products and services.
 - Maintain legal certainty for business on liability around emerging technologies. The current framework, including the limitations to intermediary liability and Product Liability Directive (PLD), offer some certainty for digital supply chains and the delivery of AI applications in the B2C context. Transparency and accountability should be promoted in the B2B context, while respecting contractual freedom. The 'Digital Service Act' discussions should seek to retain the principle of limited liability and develop a robust evidence base before proposing any change.
 - Globally, strict liability frameworks are reserved for abnormally hazardous situations as they remove any consideration of intent or negligence. Expanding the scope of the PLD to software and all AI applications would mean that anyone involved in making an AI system could be held liable for problems for which they had no control.
 - Carrying out a new risk assessment should only be required when there has been a significant change to the functionality of the product which is likely to materially alter its outcome in testing or the safety disclosures made.

²⁸ Prior to putting the system on the market.

²⁹ After putting the system on the market.

³⁰ This includes tangible and intangible assets.

- The existing liability framework is solid and technology neutral, making it flexible enough to cover the challenges arising with emerging technologies. Changing such a foundational legal and societal framework should be done thoughtfully and only in response to significant and demonstrable shortcomings with the current legislative framework. A strict liability regime for software would stall innovation in Europe, stifling economic growth.
 - Leverage the existing legal frameworks. Take a risk-based, evidence-based and outcome driven approach to any proposed interventions to the existing frameworks. Focus on specific types or levels of risk as well as specific applications or systems as appropriate
 - Security must be to the fore. We need to ensure AI and the networks and data it uses are as secure as possible. Standards work needed here. Consider cyber security by design.
 - Policy makers and stakeholders should work together to define any further appropriate safeguards needed for sensitive sectoral use cases whilst continuing to encourage innovation.
- A voluntary labelling system could risk placing a significant burden on SMEs to comply. This could favour large players who can afford to meet the requirements whilst delivering minimal benefit to consumers. There should be broad agreement on standards to ensure such a scheme would be feasible or helpful. Given the pace of change, any scheme would have to be very flexible to work as intended. Existing self-regulatory approaches should also be taken into account.

About Ibec

Ibec is Ireland's largest lobby group, representing Irish business both domestically and internationally. Our members span all sectors of the economy, collectively employing over 70% of the private sector workforce. Our policy work seeks to improve business conditions and thereby promote sustainable economic growth.

www.ibec.ie/digitalpolicy

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