CSC's views on the proposal for the EU's Multiannual Financial Framework for 2028-2034

Commission's visions for Digital Leadership require concrete implementation plans

CSC welcomes the Commission proposal for EU funding for competitiveness in the next Multiannual Financial Framework. We are particularly pleased to note that there seems to be a deep understanding of the importance of the digital sector for Europe's competitiveness and strategic autonomy and that, as a result, **Digital Leadership** features among the key priorities of both the European Competitiveness Fund (ECF) and Horizon Europe (HE).

We also commend the Commission for highlighting the cross-border nature of digital infrastructures and addressing the entire scope of the digital sector in a comprehensive and coherent manner. This kind of **holistic approach** is indispensable considering the convergent nature of critical digital technologies as well as the need to develop such infrastructures as joint European efforts on a scale that no individual Member State could achieve on their own.

To implement the holistic vision in practice, it is essential for the EU Member States to continue **pooling resources for world-class digital infrastructures** – including supercomputers, AI and quantum capacities, data platforms and high-speed networks – **and advancing their development as a mutually reinforcing ecosystem**. The Commission needs to outline on a more concrete level, how it intends to implement its high-level visions for competitiveness and digital sovereignty. For example, the EuroHPC Joint Understaking is currently building a basis for European HPC infrastructure ecosystem, however at this point the MFF proposal does not address the future of EuroHPC at all.

As MFF negotiations progress, it would be important to gain **clarity on the future direction of European HPC, AI, quantum and data ecosystem**, considering also the strategic focus on these themes visible in e.g. the AI Continent Action Plan. If Europe wants to become and AI Continent, it must ensure sustainable long-term funding for this ecosystem, taking also concrete steps to strengthen the European ownership of data, for value creation in Europe. In addition, tight horizontal linkages to **skills development** is needed. In discussing the future vision, the Commission should engage closely with relevant **stakeholders**, especially the hosting entities of the current EuroHPC infrastructures. In parallel, **legislative frameworks** should be reviewed and geared towards supporting the competitiveness of European data economy through a coherent action plan.

Data should be considered a key value creation and security asset for Europe. Thus, next to pan-European supercomputers there should be **European data platforms** for data management and storage, to boost European service and software production. These platforms should be built as

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a federated interoperable ecosystem on top of existing data infrastructure such as the European Open Science Cloud and common European data spaces.

One key element of the ecosystem is a **European web data infrastructure**. Building on the work done in the context of the OpenWebSearch.EU project and the EuroHPC AI Factories that are already developing and implementing services for enabling systematic access to web data and content (e.g. the "Datasets-as-as-Service" concept of LUMI AI Factory), this infrastructure should be developed and funded as an integral part of the ecosystem, especially feeding into the data labs of the AI Factories. This would help European companies and researchers access the kind of high-quality datasets they need for their RDI projects while also supporting the development of trustworthy and non-biased AI based on European values.

When it comes to the new governance structure of RDI funding, the roles of and divisions of labour between ECF and HE require further clarification. One key issue here are the research and technology infrastructures that serve both academic and commercial RDI. If they are placed in Pillar IV of HE, as suggested in the Commission proposal, they risk becoming too isolated from ECF. The **isolation of research infrastructures from thematic and mission-driven research** has already been identified as one of the structural weaknesses in Horizon Europe's current architecture, and this should not be repeated in the next programming period. In addition, it is key to strike the right balance between the two types of infrastructures to not overemphasise one at the expense of the other.

Considering the benefits of global exchange of ideas and expertise, we note with satisfaction that the Commission is proposing to allow **association of third countries** in both ECF and HE. It is important to ensure that the association criteria in both programmes are coherent and strike the right balance between the risks and benefits of international cooperation that the current era of heightened geopolitical tensions presents.

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