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Brussel, 10 december 2019

ADVIES

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**DE RAADPLEGING VAN DE EUROPESE COMMISSIE
OVER HET PROGRAMMA DIGITAAL EUROPA**

(goedgekeurd door het bureau op 15 oktober 2019,
bekrachtigd door de algemene vergadering van de Hoge Raad op 10 december 2019)

Situering van de Hoge Raad voor de Zelfstandigen en de KMO

De Hoge Raad voor de Zelfstandigen en de KMO is een Belgische federale adviesraad opgericht bij de wet van 24 april 2014 betreffende de organisatie van de vertegenwoordiging van de zelfstandigen en de kmo's. Hij groepeerd meer dan 170 door de Belgische overheid erkende beroeps- en interprofessionele organisaties die de belangen van de zelfstandigen en de kleine en middelgrote ondernemingen (kmo's) verdedigen. De Hoge Raad bestaat in zijn huidige vorm reeds meer dan 50 jaar. Hij heeft drie opdrachten.

De Hoge Raad treedt op als spreekbuis van de Belgische zelfstandigen, vrije beroepen en kmo's. Volgens de Belgische definitie zijn kmo's die ondernemingen die in het kader van de Europese KMO-definitie worden aangeduid als micro- en kleine ondernemingen. De Hoge Raad vervult die rol onder meer door het geven van formele adviezen en dit in de eerste plaats aan de betrokken Ministers van de Belgische federale regering maar ook aan het Belgische Parlement en aan de Europese instanties. De adviezen van de Hoge Raad bestrijken alle mogelijke facetten van het beroepsleven van zelfstandigen en kmo's: het algemeen KMO-beleid, de beroepsreglementeringen, de handelspraktijken, de problematiek van de betalingsachterstand, administratieve vereenvoudiging, enz.

De Hoge Raad heeft ook een vertegenwoordigende bevoegdheid in die zin dat hij vertegenwoordigers afvaardigt naar beheers- of raadgevende organen van diverse socio-economische instanties. Aldus duidt de Hoge Raad in een dertigtal officiële instanties de vertegenwoordigers van de zelfstandigen en de kmo's aan.

Tot slot vormt de Hoge Raad ook een overlegplatform voor de zelfstandigen en de kmo's.

De Hoge Raad is opgenomen in het gemeenschappelijk transparantieregister van het Europees Parlement en de Europese Commissie onder het registratienummer 59919253482-83.

Targeted consultation on the Orientations of the first two years of the proposed Digital Europe programme

Fields marked with * are mandatory.

Digital transformations in Europe – what is at stake?

The purpose of this consultation is to gather the stakeholders' views on the key areas, elements and priorities of the initial phases of the future EU Digital Europe programme.

The Digital Europe programme was proposed by the Commission as part of the next Multiannual Financial Framework 2021-2027. The programme's objective is to respond to the harsh challenge Europe is facing in a context of increasing global competition. Global actors are injecting vast amounts of public capital in advanced digital capacities to boost their competitiveness, modernise their public sector and protect their society and economy. However, the EU has been slower than competing regions in investing in the uptake of latest technologies including world-class infrastructures.

In concrete terms, the programme's aim is to reinforce Europe's capacities in areas of strategic importance such as high performance computing (HPC), artificial intelligence (AI) and cybersecurity and to make sure they benefit the economy and address societal challenges and citizens' needs. It plans to achieve this by overcoming the fragmentation of investments, the lack of advanced digital skills and the slow pace of adoption of innovative digital solutions by public administrations and small and medium-sized enterprises (SMEs).

Since Digital Europe will support economies and societies in their digital transformation, it has the potential to bring significant benefits to a wide variety of beneficiaries. By supporting digitalisation and modernisation of public services citizens will benefit from more user-centric services of public interest, be it health, mobility or administrative services. Public administrations will benefit from efficiencies in the provision of services, which better correspond to user needs. Businesses and in particular SMEs will have easy access to strategic capacities like data, artificial intelligence and computing resources for experimenting and testing and hence developing new business ideas. The programme will help technology transfer organisations to take an active role in the deployment of innovative solutions and support them to do so. Finally, the programme has the potential to contribute to climate targets inter alia by providing technology tools for better predicting environmental impacts (HPC), providing techniques for reducing pollution load (e.g. precision farming through AI tools), but also by choosing to promote the use of solutions with a low environmental impact.

This consultation focusses specifically on priorities for the first two years of the Digital Europe programme (2021-2022). We expect public authorities, especially at local level to be interested in this consultation, as well as industry, especially SMEs, but also any citizen who feels involved in the digital transformation.

You will find the Commission proposal for the Digital Europe programme [here](#).

You will also find the Digital Europe programme draft Orientations for 2021-2022 [here](#).

The privacy statement is available [here](#).

Thank you for your contribution!

About you

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-governmental organisation
- Public authority
- Trade union
- Non-EU citizen
- Other

* First name

40 character(s) maximum

Marc

* Surname

80 character(s) maximum

Hoogmartens

* Email (this won't be published)

80 character(s) maximum

cs.hr@economie.fgov.be

* Organisation name

255 character(s) maximum

Hoge Raad voor de Zelfstandigen en de KMO

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 employees or more)

* Country of origin

Please add your country of origin, or that of your organisation.

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- EEA country
- Other

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

59919253482-83

I agree to the processing of my personal data in accordance with the [privacy statement](#). (This is necessary to participate in the survey.)

* Publication privacy settings

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

High Performance Computing

The computing and data needs of European scientists and industry do not currently match the computation capabilities available in the EU. This situation may create problems related to privacy, data protection, commercial trade secrets or ownership of data. In addition, Europe consumes about 29% of HPC resources worldwide today, but the EU industry provides only ~5% of such resources.

Digital Europe's overarching strategic objective for High Performance Computing (HPC) is to develop, deploy and maintain in the EU an integrated world-class exascale and post-exascale supercomputing and data infrastructure, including the integration of quantum computing technologies, and to develop and support a highly competitive and innovative HPC ecosystem. This will drive innovation in the digital economy and help ensure the digital autonomy of Europe.

See pp. 7-8 of the [draft Orientations document](#).

The following main actions are foreseen for the first two years of the programme:

- Towards exascale supercomputing: involves acquiring and deploying new supercomputing capabilities, notably the precursors to exascale, several petascale EuroHPC supercomputers and one exascale EuroHPC supercomputer.
- Ensuring the widest access to HPC infrastructure: will include the definition of the conditions for European-wide access to HPC resources, the federation of national and European HPC and of data resources into a common platform and horizontal HPC-based services for industry, academia and public sector.
- Building capabilities: applications development and widening the use of HPC, by developing and supporting the ecosystem for user communities, networking HPC competence centres between participating states and through training and education activities.

Do you agree that the actions set out above identify the right priorities to addresses this strategically important sector?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you agree that the EU should support Member States in improving the existing supercomputing capacities?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Are you/is your organisation interested in investing in this area or otherwise directly involved?

- Yes
- No

* Which of the following main areas would you be interested to invest and/or be involved in and why?

- Building infrastructure capabilities in Europe
- Access to supercomputing
- Capacity building
- Other

Reasons for the selected action(s) (including 'other')

Wat HPC betreft, vormt voor ons als organisatie die de belangen van de Belgische zelfstandigen en kmo's vertegenwoordigt, de toegang voor kleine ondernemingen tot HPC de belangrijkste prioriteit.

S'agissant du HPC, nous estimons, en tant qu'organisation représentant les intérêts des indépendants et PME belges, que l'accès au HPC pour les petites entreprises est la principale priorité.

Which activities are necessary to facilitate innovation by using European Supercomputing Infrastructure for industry (including SMEs), and why?

- Een eenvoudige toegang voor kleine ondernemingen tot HPC.
- Daarnaast dient er ook gestreefd te worden naar een preferentiële toegang voor Europese en kleine ondernemingen zodat de Europese investeringen vooral deze ondernemingen ten goede komen.
- Un accès aisé au HPC pour les petites entreprises.
- En outre, il convient de tendre vers un accès préférentiel pour les petites entreprises européennes, afin que les investissements européens bénéficient surtout à ces entreprises.

Which actions are necessary to help public bodies/users profit from the European Supercomputing Infrastructure – and why?

Artificial Intelligence

Artificial intelligence (AI) has become an area of strategic importance and a key driver of economic development. It can bring solutions to many societal challenges from treating diseases to minimising the

environmental impact of farming. However, socio-economic, legal and ethical impacts have to be carefully addressed.

It is essential to join forces in the European Union to stay at the forefront of this technological revolution, to ensure competitiveness and to shape the conditions for its development and use (ensuring respect of European values).

The aim, in the Digital Europe programme is to build capacity in artificial intelligence (AI), in line with the Communication on Artificial Intelligence for Europe and the Coordinated Plan on Artificial Intelligence. To this end, it is foreseen that the first two years of the programme will focus on deploying an infrastructure which offers access to AI tools and components and data resources, as well as reference testing and experiment facilities in some prioritised application sectors.

See pp. 9-10 of the [draft Orientations document](#).

The proposed priorities for the first couple of years are the following:

- establishing EU-wide common data spaces providing access to data for AI, building on data from the public and the private sector. The aim is to support the emergence of European data spaces identified for industrial/societal priorities, including through trustworthy industrial and personal data platforms to exchange verified data, and to make a critical mass of high value public sector data sets accessible and fit for AI applications and use in concrete large-scale test cases. During the first two years the programme will focus on the creation of EU wide data spaces for health (including the pooling of medical images and human genome data), environmental, industrial and mobility data, where data are shared, pooled and used at European level.
- developing world-class large-scale reference Testing and Experimentation Facilities for AI hardware, software, components, systems and solutions, and underlying resources (data, computing, cloud), thus providing a highly-specialised resources to be shared at European level. The following sectors may be targeted: health, agri/food, environment, clean/renewable energy, manufacturing, smart cities and mobility (including autonomous driving, logistics, shipping, trains, etc.).
- scaling up the Common European AI platform, building on the existing AI-on-demand platform, to provide a single access point to high quality tested AI resources (including knowledge, computing power, tools and algorithms), and, where needed, bring such resources to industrial standard, and to provide corresponding support for its users to integrate AI into solutions, products and services.

Do you agree that the actions set out above identify the right priorities to addresses this strategically important sector?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you agree that the EU should support Member States in improving the business case for investments in such a strategically important sector?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Are you/is your organisation interested in investing in this area or otherwise directly involved?

- Yes
- No

In which sectors would the establishment of European common data spaces to access/pool data have the highest impact?

at most 3 choice(s)

- Health and care
- Agri-food
- Environment/climate
- Clean/renewable energy
- Industry/manufacturing
- Transport/mobility
- Other (please specify)

If other, please specify

De HRZKMO is er voorstander van in de eerste plaats actie te ondernemen in die sectoren waar er zakelijke opportuniteiten voor ondernemingen en in het bijzonder kmo's bestaan. Dat zal niet alleen een direct economisch effect hebben maar tevens een sneeuwbaaleffect veroorzaken doordat deze ondernemingen die zakelijke opportuniteiten gaan benutten en verder uitbouwen. De in de keuzelijst vermelde sectoren kunnen daarvoor in aanmerking komen maar ook andere sectoren zoals de intellectuele dienstverlening.

Le Conseil Supérieur est partisan, dans un premier temps, d'actions ciblant les secteurs au sein desquels il y a des opportunités professionnelles pour les entreprises et en particulier pour les PME. Un tel procédé aura non seulement un effet économique direct, mais déclenchera également un effet boule de neige puisque ces entreprises profiteront des opportunités professionnelles susmentionnées et les développeront. Les secteurs repris dans la liste ci-dessus peuvent entrer en ligne de compte, mais également d'autres secteurs tels que les prestataires de services intellectuels.

In which application sector would world-class large-scale reference Testing and Experimentation Facilities have the highest impact?

at most 3 choice(s)

- Health and care
- Agri-food
- Environment/climate
- Clean/renewable energy
- Industry/manufacturing
- Transport/mobility
- Other (please specify)

What resources/services should the Common European AI platform offer to maximise the added value to its users (and optimise the use of AI resources "made in Europe")?

- Access to software tools or solutions offered by the platform

- Access to infrastructure and technical support for prototyping and testing
- Access to expertise (technical and other) to help assessing the added value if AI in your context
- Access to data
- Offer a “market place” – single access to all AI resources in Europe
- Other, please explain

If other, please explain

Specifieke wat kleine ondernemingen betreft, zou het AI platform ook volgende acties moeten nemen:

- Kleine ondernemingen informeren maar zeker ook sensibiliseren over de mogelijkheden en opportunititeiten die AI ook voor hen kan inhouden. Het demystificeren van AI.
- Voldoende toegankelijk en bereikbaar zijn voor kleine ondernemingen en voor ondernemingen die geen specialisten in huis hebben maar wel interesse hebben in de mogelijkheden van AI.
- Informatie en ondersteuning bieden aan ondernemingen die zelf geen gebruik van AI tools willen maken maar die wel gebruik willen maken van de resultaten en inzichten die AI heeft opgeleverd of die daarvoor met een andere onderneming, die wel AI gebruikt, willen samenwerken.
- Beste practices uit de verschillende lidstaten verzamelen en ter beschikking stellen.
- Mee de basis leggen voor een duidelijk en werkbaar juridisch kader waarbinnen de ondernemingen AI tools kunnen ontwikkelen en gebruiken.

En ce qui concerne les petites entreprises en particulier, la plateforme IA devrait également prendre les mesures suivantes :

- Informer les petites entreprises mais certainement aussi les sensibiliser, à propos des possibilités et opportunités que l'IA peut leur offrir. Démystifier l'IA.
- Être suffisamment ouverte et accessible pour les petites entreprises et pour les entreprises qui ne disposent pas de leurs propres spécialistes mais qui sont intéressées par les possibilités de l'IA.
- Fournir des informations ainsi qu'un soutien aux entreprises qui ne souhaitent pas utiliser les outils IA elles-mêmes mais qui voudraient utiliser les résultats ou les données engendrés par l'IA ou collaborer avec une autre entreprise qui a elle recours à l'IA.
- Réunir et mettre à disposition les meilleures pratiques des différents États membres.
- Contribuer à la création d'une base pour un cadre juridique clair et opérationnel dans lequel les entreprises peuvent développer et utiliser des outils IA.

What would be your offer to/ need from this platform?

- Using the platform to distribute the tools/solutions you have developed (does not have to be for free)
- Using the tools made available via the platform
- Using expertise offered by the platform
- Other, please explain
- None

If other, please explain

Het platform kan voor de verspreiding van informatie en andere acties gericht op kleine ondernemingen beroep doen op de bestaande intersectorale en sectorale ondernemersorganisaties.

Dans le cadre de la diffusion d'informations et d'autres actions visant les petites entreprises, la plateforme peut faire appel aux organisations d'entrepreneurs intersectorielles et sectorielles existantes.

Cybersecurity

The digital era is creating numerous new opportunities for the economy and society. But, at the same time, it introduces new challenges. Cyber-incidents and cyber-attacks cause the loss of billions of euros every year. Cybersecurity, trust and privacy are the foundations of a prosperous European Digital Single Market.

The European Union works on a number of fronts to promote cyber resilience across the European Union. Establishing a Network of Cybersecurity National Centres with a new European Cybersecurity Industrial, Technology and Research Competence Centre lies at the heart of this process.

Actions in the Digital Europe programme addressing cybersecurity aim to reinforce European strategic autonomy in this area by strengthening the cyber resilience of essential services in the Digital Single Market and by creating a strong, innovative and autonomous European industry.

See pp. 11-12 of the [draft Orientations document](#).

The proposed priorities in the first two years will focus on:

- Quantum Communication Infrastructure: starting the large-scale deployment for an infrastructure which will offer high security in critical communications.
- Certification: contributing to the implementation of the regulation “[EU Cybersecurity Act](#)”, notably by supporting enabling infrastructure for security certification, the adoption of those certification schemes ([focusing first on 5G infrastructures](#)) and through awareness-raising activities.
- Cyber Threat Information Network: deploying through key cyber ranges, with Member States and industry, the European cyber threat information network needed at national and at industrial levels, by the creation of federated interconnected data repositories (e.g. vulnerabilities, intelligence); by supporting testbeds where ICT equipment and services will be assessed; by providing AI tools (e.g. for data analytics, for augmenting self-healing), by supporting trainings and skill development.
- Continuation of the support for the implementation of NIS directive through capacity building and the enhancement of cross-border cooperation on cybersecurity at technical, operational and strategic levels among Member State bodies and among industry stakeholders, including Information Sharing and Analysis Centres (ISACs).
- Cybersecurity Competence Centre Network (CCCN): deploying the [competence centre network](#) with Member States.
- Market uptake of innovative solutions: widening the deployment of cybersecurity tools and strengthening EU industrial capacity in cybersecurity, inter alia by supporting faster validation and take-up of new research/innovations, and supporting EU supply chain providers from critical sectors.

Cybersecurity both underpins the security of AI tools and high performance computing infrastructures supported under other parts of the programme, and relies on them for the development of its own solutions (e.g. by testing against attacks run on high performance computing machines). A key activity will also be the creation in coordination with activities under the advanced digital skills pillar of the programme, of the specific skill sets needed by professionals.

Do you agree that the actions set out above identify the right priorities to address this strategically important sector?

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	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you agree that the EU should support Member States in improving the business case for investments in such digital infrastructure deployments?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Are you/is your organisation interested in investing in this area or otherwise directly involved?

- Yes
 No

Which of the proposed areas of intervention would be of interest to you/your organisation?

- Quantum computing infrastructure
 Certification
 Cyber threat information network
 Implementation of the NIS Directive
 Market uptake
 Other, please explain

If other, please explain

- De HRZKMO vraagt zich af in welke mate quantum computing infrastructure zal bijdragen tot de cyberveiligheid van kleine ondernemingen.

- Wat de certificatie betreft, is de HRZKMO geen voorstander van KMO cyberveiligheidscertificatie. Cyberveiligheid is van zeer groot belang voor alle kmo's, ook voor kmo's in sectoren die niet uitgesproken digitaal zijn. Certificatie is echter niet voor alle kmo's nuttig. Er dient rekening gehouden te worden met de context waarbinnen de kmo actief is. Certificatie laat toe aan externen te tonen dat men cyberveilig is. De prioriteit moet echter in de eerste plaats liggen bij het cyberveilig zijn want in alle kmo-sectoren bestaat er nog een grote behoefte aan bewustwording en concrete maatregelen om de cyberveiligheid van de kmo's te vergroten. Kmo's zijn zich vaak nog niet bewust van de risico's en uitdagingen inzake cyberveiligheid. Tevens moeten ze de nodige informatie en tools krijgen om die uitdagingen aan te gaan.

- Er dienen dus vooral acties ondernomen te worden om kmo's bewust te maken van de noodzaak om zich beter te beschermen en acties om de kmo's op zeer concrete wijze te helpen om zich ook daadwerkelijk beter te beschermen.

- Le CSIPME se demande dans quelle mesure l'infrastructure quantum computing contribuera à la cybersécurité des petites entreprises.

- En ce qui concerne la certification, le CSIPME n'est pas favorable à une certification de la cybersécurité des PME. La cybersécurité est d'une importance capitale pour toutes les PME, également pour celles relevant de secteurs d'activités qui ne sont pas particulièrement de nature numérique. En revanche, la certification n'est pas utile pour toutes les PME. Il convient de tenir compte du contexte dans lequel la PME opère. La certification permet de démontrer sa cybersécurité à des tiers. La première priorité doit pourtant

être l'assurance de la cybersécurité, étant donné qu'il existe, dans tous les secteurs de PME, un grand besoin de sensibilisation et de mesures concrètes visant à augmenter le cybersécurité des PME. Les PME ne sont bien souvent pas encore conscientes des risques et défis posés par la cybersécurité. En outre, elles ont besoin des informations et outils nécessaires pour relever ces défis.

- Il convient donc surtout de prendre des mesures visant à sensibiliser les PME de la nécessité de mieux se protéger ainsi que des mesures visant à aider les PME de manière très concrète pour faire cela.

Advanced Digital Skills

Gains from investment in the new capacities will not materialise if there are not enough people able to use and deploy them. Currently, the EU is facing a systemic digital skills gap, in particular when it comes to the most specialised digital skills. As highlighted in the mid-term review on the implementation of the Digital Single Market Strategy, over the past 10 years, employment of ICT specialists in the EU has grown by around 2 million, but 53% of companies looking to take on new ICT staff struggled to do so in 2018 (Source: Eurostat). In addition, the offer of specialised education in digital technologies seems to be concentrated only in some geographical areas and sometimes not reflecting the latest technological developments ([JRC 2019](#)).

Actions under this objective aim at addressing the shortages of digital experts in the EU in particular in the fields of artificial intelligence, high performance computing and cybersecurity.

See pp. 12-14 of the [draft Orientations document](#).

It is proposed that the programme will, in the first two years, focus on (1) setting up highly specialised Masters programmes or modules, as well as the reinforcing existing ones through the establishment of consortia of higher education institutions working alongside excellence centres and industry participants; (2) the design and delivery of short-term training courses in the advanced technologies for both people already in employment and those unemployed and (3) the provision of job placements in companies or research centres, in particular to students and graduates, to acquire the necessary advanced digital skills needed for the deployment of the above advanced technologies.

Do you agree that the EU should support Member States in improving the advanced digital skills necessary to operate the up-to-date digital infrastructures?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Are you/is your organisation interested in investing in this area or otherwise directly involved?

- Yes
 No

Does your organisation provide specialised training courses in artificial intelligence, high-performance computing, cybersecurity or blockchain?

- Yes

Digital Innovation Hubs

For Europe to remain competitive internationally, its companies and public administrations must be able to benefit from digital opportunities. This will lead to higher value products and smarter processes. The digital revolution brings opportunities for many actors, but many of them still find it difficult to know in which technologies to invest and how to secure financing for their digital transformation. The hubs funded under the Digital Europe Programme, the *European Digital Innovation Hubs (DIH)*, can help ensure that every company and public administration, small or large, high-tech or not, can grasp the digital opportunities.

DIHs offer access to technology-testing, financing advice, market intelligence and networking opportunities. The Digital Europe programme will co-invest, together with Member States, in capacity building for a select number of DIHs to help the digital transformation of SMEs and public sector organisations on a large scale. While Member States' investments in DIHs – supported through national, regional or European Regional Development Funds - would focus on local activities of a hub, the Digital Europe Programme would focus on trans-national activities of European added value. EU funding would allow for example to enhance their capacity to serve more than one country and to export a DIH's excellence and to ensure that the capacities that have been build up for HPC, AI, cybersecurity, advanced digital skills are being diffused across the whole economy everywhere in Europe.

See pp. 14-16 of the [draft Orientations document](#).

It is proposed that over the first two years the programme will setup an initial network of European DIHs and the early stages of the network's expansion. Beyond the geographical coverage (at least one European DIH per Member State from the start, aiming ultimately at one hub per NUTS2 region in subsequent years), the ambition is to support the highest quality hubs. Each DIH will have a specialisation, which can be build up over time, and which should ensure the future strengths of the region's industry and public sector, e.g. precision agriculture, smart manufacturing, smart government, ... by combining AI, HPC or cybersecurity and promising application areas, e.g. in smart specialisation priorities. Some of these hubs may focus at health and care, smart and sustainable cities and communities, agrifood or blockchain. The Digital Europe programme will also support the networking of the European Digital Innovation Hubs amongst themselves to transfer expertise between regions and to be able to provide expertise not locally available.

Do you agree that it is strategically important to have a well-connected network of regional hubs to support SMEs and local administrations in their digital transition?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you agree that the EU should support Digital Innovation Hubs to help SMEs and local administrations in their digital transition?

	Completely agree	Partially agree	Partially disagree	Completely disagree	No opinion
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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* Are you/is your organisation interested in investing in this area or otherwise directly involved?

- Yes
 No

What aspects of the DIH capacity need to be supported the most and how should the programme address these?

- Kleine ondernemingen wijzen op de mogelijkheden en opportuniteiten van nieuwe technologieën.
- Kleine ondernemingen in het bijzonder ondersteunen. In het oriëntatiedocument wordt ook naar midcaps verwezen maar die ondernemingen hebben volgens de HRZKMO gezien hun grotere omvang minder nood aan specifieke ondersteuning. Bovendien is er geen duidelijke omschrijving van wat onder midcaps moet verstaan worden.
- Toegang tot en delen van technologie en kennis aangezien kleine ondernemingen niet de schaal hebben om die zelf op te bouwen of zich daar toegang toe te verschaffen.
- Het is belangrijk dat er voor de Digital Innovation Hubs nauw wordt samengewerkt met de bestaande intersectorale en sectorale ondernemersorganisaties aangezien deze een goed zicht op de behoeften van de kmo's hebben en in een goede, directe relatie met deze ondernemingen staan.
-
- Attirer l'attention des petites entreprises sur les possibilités et opportunités offertes par les nouvelles technologies.
- Soutenir les petites entreprises en particulier. Dans le document d'orientation, il est également fait référence aux « mid caps », mais le Conseil Supérieur estime qu'un soutien spécifique est moins nécessaire pour ces entreprises, eu égard à leur taille plus importante. En outre, il n'y a pas de définition claire de ce qu'il y a lieu d'entendre par « mid caps ».
- Assurer l'accès au et le partage des technologies et connaissances, étant donné que les petites entreprises n'ont pas la taille nécessaire pour les développer elles-mêmes ou y accéder.
- Dans le cadre des Digital Innovation Hubs, il importe de collaborer étroitement avec les organisations d'entrepreneurs intersectorielles et sectorielles existantes, étant donné que ces organisations ont une idée précise des besoins des PME et entretiennent de bonnes relations directes avec elles.

How should the programme incentivise collaboration between DIHs in order to strengthen the European network of DIHs?

Areas and sectors for high impact deployments

Europe needs to provide a simpler and faster way to deliver public services no matter where people are travelling or living in the EU. This involves employing digital solutions, notably in areas where there is a clear European benefit in scale and cross border access.

The proposal for the first two years will focus on projects with high transformative impact in key areas of public interest. Building on investment made in digital service infrastructures under the current CEF Telecom programme and interoperable solutions under ISA² programme, Digital Europe aims to rapidly

scale up pan-European investments in interoperable and interconnected digital services, ensuring that the benefits of new technologies are taken up in key services of public interest across the EU economy.

High impact deployments

See pp. 16-28 of the [draft Orientations document](#).

Digital for a clean planet: actions aim at 'greening' the ICT sector, namely by improving the energy efficiency as well as reparability, lifespan and recycling (circularity) of ICT products and services in order to minimize the unwanted side effects of digitalisation and to contribute positively overall to environmental goals, in particular to climate and circular economy. They will focus on common and open environment data spaces, on industrial pilots to test full reverse-flow industrial systems, from the finished products to modules, components and raw materials in the area of ICT goods and on building trust and innovation for/in green digital products and services (including standards and applications).

How important do you consider EU support for digital technologies and their use to have a clean planet?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Clean, sustainable and smart communities and mobility: actions aim at large scale deployment of open, interoperable and trustworthy cross-sectorial urban digital platforms & AI driven services and cross-border Mobility as a Service; support actions to innovative SMEs and start-ups; and development of new business models and shared practices including political engagement and user acceptance.

How important do you consider EU support for clean, sustainable and smart communities and mobility?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Digital transformation of agri-food: actions aims at accelerating the deployment of digital solutions in the agri-food sector and will focus on setting up large-scale reference experimentation and testing facilities, allowing technology providers to test their technologies in real environments, and networking agri-food digital innovation hubs building on the existing related hubs.

How important do you consider EU support for the digital transformation of the agri-food?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Digital transformation for better and sustainable health and care: actions aim to improve the efficiency and quality of health and care systems by accelerating and scaling-up the integration of new digital solutions. A key goal is the development of a European health data space. It builds on existing actions for cross-border interoperability of electronic health records and other relevant datasets, through setting up the infrastructure, fostering consensus on common standards, and building on initiatives in Member States and regions. It also entails fostering a European approach to accessing health data sets, setting up testing and experimentation platforms and training of health and care professionals that will enable the development, testing and deployment of innovative data-driven tools and services based on technologies like AI and data analytics, taking advantage of advanced computing and of federated cloud services for faster data processing.

How important do you consider EU support for the digital transformation of health and care?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Citizen-centric digital public services: the programme will support European public administrations by:

- providing a Digital Transformation Platform Ecosystem to support the interoperability of data and services across borders and across domains;
- developing the technical specifications and supporting the infrastructures to realise the once-only principle across borders;
- providing an interoperability incubator infrastructure to support innovative GovTech services

The proposed ecosystem will build on the the [Connecting Europe Facility \(CEF\) Building Blocks](#), [ISA²](#) and the [European Open Data Portal](#).

How important do you consider EU support for the digital transformation of public services, in particular for their cross-border interoperability and for the realisation of the once-only principle?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Justice: the programme will provide support to continue to operate, maintain and expand the already established digital service infrastructures: the Online Dispute Resolution system, the Business Registers Interconnection Systems, and the [eJustice portal](#). In addition, innovative solutions in the field of justice will be piloted in the framework of the interoperability incubator. Applications in the justice field may also serve as use cases for innovative technologies, such as AI and blockchain.

How important do you consider EU support for the digitalisation of justice related activities?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
*						

Please evaluate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Security: the programme will provide support to the deployment of digital tools for use by competent authorities in charge of public order and security (law enforcement, border and coast guards, customs, first responders). In particular, it will support the use of AI for the analysis of large amount of data for law enforcement purposes and on the creation of data spaces for training and testing. Given the sensitivity of the security domain and the need to ensure the societal acceptance of the final tools, potential ethical and legal implications will be adequately addressed.

How important do you consider EU support for the digitalisation of Security related activities?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Digital cultural heritage : actions aim at supporting the i) advanced digitisation of cultural assets in adopting, making use of innovative use of digital technologies in the cultural heritage domain but also in helping them to upskill. The cultural heritage sector requires very specific skills in terms of technique of digitisation, as each object is unique and widely vary in size, scope and material ; and ii) the [Europeana](#) initiative to act as a catalyst and innovator for cultural heritage institutions, supporting EU Member States to address challenges faced in the digital transformation of access to culture. Europeana will also act as a showcase for leveraging digital opportunities to maximise the impact of cultural heritage institutions' activities and outreach.

How important do you consider EU support for the digital transformation of cultural heritage institutions?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Blockchain: activities will focus on the further development and deployment of the European Blockchain Services Infrastructure (EBSI) in cooperation with countries which are member of the European Blockchain Partnership. EBSI concerns both the applications (use cases) and the infrastructure underpinning them. EBSI should address mainly cross border public services in first steps, but it should also support services concerning public and private organisations (such as new identification services based on blockchain, Know your Customer – KYC, etc).

How important do you consider EU support for the deployment and uptake of blockchain?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Cloud federation as a Service: actions aim at deploying a federation of pan-European Cloud Services - including data storage and data optimisation services - to be seamlessly used by public administrations and small and medium companies across the whole EU to ultimately enable a swift provision of European services of general interest of both public and economic nature.

How important do you consider EU support for the deployment of a federation of pan-European Cloud Services?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Widening the best use of digital technologies

See pp. 28-30 of the [draft Orientations document](#).

Building trust in the digital transformation: actions are targeting two groups: minors and citizens getting and sharing news and information online.

Protecting and empowering minors, a particularly vulnerable user group of online content and services, and tackling the online dissemination of child sexual abuse material (CSAM), require continuous action within a multidisciplinary and transnational approach. The proposal is to continue support for the network of Safer Internet Centres in the Member States providing awareness raising activities, helpline counselling for children and hotlines for reporting CSAM.

As more and more citizens get and share news and information online, online disinformation proliferates, and there is a need for measures aimed at detecting and combatting intentional disinformation spread. Online disinformation will be tackled by the use of new technologies for checking veracity and source of information on the internet, and by networking stakeholders addressing the same issue in Member States so to develop adequate responses to the phenomenon of disinformation that involve the whole media ecosystem.

How important do you consider EU support for a more trustful and safer internet?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Language technologies: English currently dominates the digital environment, while other EU languages are under-represented. This gives rise to economic, social and cultural barriers. To ensure that latest technologies are available across all EU languages so as to provide all EU citizens with access to online content and services in their language and all SMEs with latest technologies tuned to their needs, this action will support localisation and deployment of language technologies such as automatic translation, subtitling or text analytics across Europe.

How important do you consider EU support for bringing down language barriers and deploying the latest language technologies?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Digital transformation of learning and education: Education is a key investment in Europe's future. Education plays a vital role in boosting growth, innovation and job creation. Europe's education systems need to better prepare students to the requirements of the job market in a context of rapid and profound changes induced by the technological revolution and globalisation. The objective of this action is to include as many schools (primary, secondary, vocational) as possible in large scale actions making use of digital capabilities with the aim of scaling up good practises at European level that have already been proven successful in smaller scale pilots.

How important do you consider EU support for the digital transformation of learning and education?

	Very important	Important	Moderately important	Not very important	Not at all important	No opinion
* Please evaluate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Additional deployments

In which areas or sectors, not already identified above, would EU investments supporting the digital transformation be necessary, and why?

Hoewel het Digital Europe programma in zijn doelstellingen wijst op het grote belang van de adoptie door kmo's van nieuwe technologieën komt dit in de oriëntatie voor de eerste twee jaar niet tot uiting. Het programma moet meer steunmaatregelen voorzien voor de digitale transformatie van kleine ondernemingen. Kleine ondernemingen kunnen gezien hun kleinere schaal die uitdaging moeilijker alleen aangaan. Bovendien zijn het juist vaak kleine ondernemingen die voor belangrijke innovaties zorgen. De focus van het Digital Europe programma op die kleine ondernemingen moet dan ook zeker versterkt worden.

Bien que le programme pour une Europe numérique souligne, dans ses objectifs, l'importance capitale de l'adoption des nouvelles technologies par les PME, cela ne se reflète pas dans l'orientation pour les deux premières années. Le programme devrait prévoir plus d'aides pour la transformation digitale des petites entreprises. Les petites entreprises éprouvent, de par leur taille réduite, plus de difficultés à relever ce défi seules. En outre, les petites entreprises sont souvent une source d'innovations importantes. Il convient dès lors que le programme pour une Europe numérique mette encore davantage l'accent sur ces petites entreprises.

Synergies and Implementation

What would be the best way, in your view, to ensure synergies and complementarity with other sources of public funding, whether from Member States and/or EU programmes? Please specify which action you are referring to.

Er dient zo veel mogelijk gewerkt te worden via bestaande actoren en structuren.

Il convient de travailler autant que possible via des acteurs et structures existants.

Which type of partners/consortium members (e.g. SME, universities, beneficiaries from 3rd countries, etc.) would you need in order to invest / be involved in the chosen action?

De intersectorale en sectorale ondernemersorganisaties kunnen, gezien hun goede relatie met de kleine ondernemingen, een belangrijke rol spelen bij het bereiken van deze doelgroep.

Vu leur bonne relation avec les petites entreprises, les organisations d'entrepreneurs sectorielles et intersectorielles peuvent jouer un rôle important quand il s'agit d'atteindre ce groupe cible.

For the actions you are most interested in please indicate main activities and the overall project size (in million EUR)?

5000 character(s) maximum

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Which mechanisms could projects use to incentivise the take-up by different actors, including SMEs, of the capacities provided by the programme?

- Kleine ondernemingen informeren en sensibiliseren over de opportuniteiten die nieuwe technologieën ook voor hen bieden, onder meer door het tonen van voorbeelden en best practices en door het demystificeren van die nieuwe technologieën.

- Kleine ondernemingen opleidingen aanbieden over de strategische en technische aspecten van digitale transformatie en digitale technologieën.

- Financiële ondersteuning van kleine ondernemingen

- Kleine ondernemingen toegang bieden tot de technologie en kennis

- Informer et sensibiliser les petites entreprises à propos des opportunités que les nouvelles technologies leur offrent à elles aussi, entre autres en montrant des exemples et les meilleures pratiques ainsi qu'en démystifiant ces nouvelles technologies.

- Proposer aux petites entreprises des formations relatives aux aspects stratégiques et techniques de la transformation digitale et des technologies numériques.

- Un soutien financier pour les petites entreprises.

- Permettre aux petites entreprises d'accéder aux technologies et connaissances.

What form of financing do you consider adapted to the actions of the draft Orientations indicated in the questions above? Please explain.

In which area of the draft Orientations would you recommend a simplified form of cost reimbursement for grants (e.g. unit costs, lump sums, other)?

- High Performance Computing
- Artificial Intelligence
- Cybersecurity
- Advanced Digital Skills
- European Digital Innovation Hubs
- High-impact deployments
- Widening the best use of digital technologies
- None of the above

Contact

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