



Putting Simplification into Action: a Code of Practice for Europe’s AI Continent Ambitions

The undersigned associations represent companies of all sizes operating in Europe and beyond across the entire AI value chain: from AI model developers to downstream providers and deployers of AI systems and models. Our members are driving transformative advances in AI technologies which will bring enormous benefits to the EU’s economy and society.

The European Commission recently launched its AI Continent Action Plan, laying out an ambitious vision to boost development and deployment of transformative AI models and systems in the EU. **The plan rightly makes regulatory simplification one of its five core pillars**, underscoring the need to provide businesses with the right legal certainty, to support the innovation and competitiveness objectives of the EU, and noting that “the AI Act’s success will depend on how workable its rules are in practice.”

The finalization of the EU Code of Practice for General Purpose AI (GPAI) models – expected in the coming weeks - **is the perfect opportunity to put this plan into practice** and demonstrate the EU’s commitment to delivering a clear and pro-innovation legal framework. To do so, **now is the time for EU policymakers to make deliberate policy choices across the final Code that prioritize innovation, clarity, workability and simplification**, in full coherence with the spirit and objectives of the AI Continent Action Plan.

The Code of Practice is meant to help providers of GPAI models demonstrate compliance with their legal requirements under the EU AI Act. It also serves to support the wider AI value chain. As such, the Code can serve as a valuable tool to create legal certainty for all parties and support compliance in an area where relevant standards are lacking or only beginning to emerge. However, the most recent draft of the Code still contains multiple requirements that are unnecessarily complex, burdensome, and beyond the scope of the AI Act. These include for example mandatory involvement of third parties in risk assessments, complex notification and reporting requirements, some copyright measures outside the scope of the AI Act as well as an ambiguous impact on downstream providers.

We ask EU policymakers to address these issues, by making the final draft significantly simpler, less prescriptive and in line with the AI Act. An innovation-friendly approach should also apply to upcoming deliverables such as the template for the summary of training content and the guidelines accompanying the Code. **Without these changes, the Code would risk creating legal uncertainty, and deter participation,** thus undermining the very purpose of a Code of Practice. The Commission should also ensure the implementation timelines allow companies sufficient time to comply. This will in turn send a strong signal to the EU's AI ecosystem and to investors, it will boost development and deployment of AI and ultimately create the conditions for Europe to truly become the AI Continent.

We look forward to continuing working with EU policymakers in support of these objectives.

The undersigned:

Allied for Startups

Anitec Assinform

Business Software Alliance

Computer & Communications Industry Association (CCIA Europe)

Confederation of Danish Industry

DOT Europe

EuroISPA – European Association of Internet Services Providers

ITI, Information Technology Industry Council

Svenskt Näringsliv – Confederation of Swedish Enterprise

ZPP – Union of Entrepreneurs and Employers