ERRIN response to The Committee of the Region's consultation on the AI Continent Action Plan

As clearly communicated in high-level EU policy vision documents such as the Draghi Report, the rising importance of digitalisation and automation as both critical enablers of economic competitiveness and as key pathways towards citizen-centred welfare will be undeniable moving forward. Particularly, recent breakthroughs in Artificial Intelligence (AI) have highlighted the extreme potential of the sector across several industries, proving itself as a source of profound transformative innovation in areas such as scientific research, high-value added services, education and public administration.

With these breakthroughs initiating a global race in development and investment with regards to AI, ERRIN fully supports the EU's ambition to position itself as a global leader in the technological development of AI, while ensuring this is pursued in line with human rights, societal cohesion, scientific discovery, democratic legitimacy and environmental sustainability.

This report champions the following key strategic points, consolidated through an open consultation process that elicited input from several regions, municipalities and entities engaged in the implementation of AI in their thematic context:

- **Regions should be empowered as AI enablers** who have a vital role to play in both the uptake and creation of high-value added AI driven tools and services given their access to place-based data.
- **Federated data models and interoperable frameworks** offer a critical pathway towards creating resilient, cross-border AI ecosystems aligned with EU values and tackling persistent issues with fragmentation and scalability across the Union's digital ecosystem.
- **Legal frameworks should be clarified and harmonised** and the EU AI Act should be made accessible and understandable for local authorities with harmonised data governance and open-source solutions.
- **Regionally relevant AI tools and funding mechanisms should be created** and reinforced with aligned funding from schemes such as Horizon Europe, Interreg, Digital Europe and ERDF.
- **Successful regional use-cases should be scaled and capacity reinforced** with collaboration between the innovation actors (public sector, academia, industry and civil society) further facilitated with regards to AI.
- **The role of European Digital Innovation Hubs should evolve** to include both their capacity of one-stop-shops for digitalisation as well as their elevation into well-coordinated, regionally co-designed AI Experience Centres working in sync with local, regional and national efforts in Artificial Intelligence.

Priorities of the AI Continent Action Plan

Towards being able to achieve the twin ambitions of global leadership and a deployment of AI that benefits regions, their ecosystems and citizens from across the European Union, several members of ERRIN's network stress the **importance of investments in federated data infrastructure, the harmonisation of governance frameworks and the cultivation of a vibrant and organic AI ecosystem that offers services and integrates data from across EU landscape**.

The expansion of domestic capabilities in high-performance computing and launch of AI skills programmes will serve as necessary steps if we are to ensure that the AI industry in Europe has the required infrastructure and talent pool to unlock cutting-edge capabilities, products and services as well as sustain them in the long-term. **It is essential that these capabilities align with ethical priorities such as environmental sustainability and human rights.** This will help build trust, counter misuse of AI tools and address negative externalities such as high energy and water usage. On data infrastructure, **the promotion of interoperable data frameworks** such as those drafted by the Living-in.EU project through their Minimum Interoperability Mechanisms (MIMs) will be critical in ensuring that AI strategies can come to be reinforced by an interconnected, hypermobile and self-reinforcing EU-wide ecosystem for data.

We also believe that, while the advancement and utility of AI is dependent on infrastructure that is geographically located such as supercomputers, AI gigafactories and data centres, **the hypermobile nature of data and broad utility of digitisation opens up significant opportunities for regional actors and authorities** who could be key agents for the uptake of AI-services, critical sources for high-quality data, fertile ground for regulatory experimentation and sandboxing as well as providers of talent and capital. Indeed, lattice-like operational and governance structures in EU-level digital infrastructure such as the European Open Science Cloud (EOSC) have shown the potential of a federated data model and the several benefits that could arise from the integration of actors from across the Union's digital, scientific, industrial and administrative landscape.

From a legal perspective with regard to the EU AI Act, there is uncertainty in many local authorities regarding the compliant use of AI. Therefore, **the European Commission should provide targeted, easily accessible and understandable information on the EU AI Act for local authorities**. The announced **AI Act Service Desk should consider public administration as an important target group and provide appropriately tailored information and support for local stakeholders.** To enable responsible and scalable AI adoption, the EU should clarify and harmonise legal frameworks to facilitate cross-border and intergovernmental data exchange, as current laws often hinder public sector collaboration. It should also promote open-source AI solutions to enhance transparency and reduce vendor lock-in, support regional AI governance models that preserve local control over data and decisions, and invest in public sector AI-readiness through targeted funding, training and infrastructure.

With regards to regional expansion and integration that goes beyond a federated-by-design and interoperable approach, the creation and deployment of specific instruments such as rural experimentation funds, cross-border pilots and the expansion of the EU Artificial Intelligence observatory to include the monitoring and advocacy of regional uptake in AI have been stressed by ERRIN members. Other measures that would be of key benefit to local and regional authorities include possible European AI toolkits for targeting them specifically, regional AI sandboxes, a repository of public and open-source AI models and measures under Erasmus+ that reinforce the talent pool with regards to AI.

Adoption of regional AI solutions

Regional authorities, being close to the citizen and both empowered with the ability and charged with the responsibility to enable and support their welfare, are key providers of civil and administrative services. This makes them ideal targets for digital, automated services to cut down on administrative burden, enhance the quality and efficiency of said services and enhanced user satisfaction.

The region of Bourgogne-Franche-Comté deploys artificial intelligence in their public administration in a number of capacities such as predictive maintenance via Interreg's ENO BEPROACT, document automation and the use of chatbots. The region's Green Transition goals are further strengthened by AI through use-cases tied to energy efficiency and waste management. Finally, the region underlines the utility of AI in education and mobility while noting that a regional ecosystemic approach that integrated academic, private-sector and broader members of innovation clusters is vital in ensuring that the full value of AI was unlocked. The region also stresses the positive impact of the sharing of best practices and bench-learning in allowing them to build capacity and avoid duplications of effort with their active participation in Interreg ENAIBLER, which brings togethers 9 partners from 6 EU regions to support AI-driven digital transformation, being a clear example of this.

The region of Västra Götaland champions AI's utility as a vital and critical tool in core fields such as Healthcare, particularly in areas that suffer from rising care needs due to aging populations. Regions with particularly empowered healthcare authorities also have great potential to serve as testbeds for AI-driven innovation in health, allowing for high quality services for patients, the potential development and scaling of relevant products and services as well as the cultivation of high-quality data sets.

The European Office of the Metropolitan Region Frankfurt-Rhein-Main highlights two innovative applications of artificial intelligence supporting local authorities in digital transformation and climate goals. In the municipality of Hofbieber, an AI-driven digital twin[1] integrates geospatial data, energy metrics, emission factors and land-use information to model and simulate the impact of planning decisions on climate neutrality targets by 2030. This dynamic data model allows real-time scenario analysis of measures such as building renovations, traffic optimisation and greening efforts, enabling evidence-based prioritisation of effective climate strategies. In the District of Bergstraße, AI is being deployed to assess road conditions[2] using video footage collected during regular waste collection routes. These recordings are centrally analysed using AI, significantly reducing manual inspections and allowing for earlier detection of damage. Both

cases demonstrate how AI technologies can enhance municipal decision-making, efficiency and sustainability.

The Province of Flevoland is currently focused on piloting various AI applications to assess their feasibility, usability and governance implications before broader adoption. The only AI tool in active use is Textmetrics, which helps the HR department rewrite job postings using inclusive language. Ongoing pilots include FLAIR, a chatbot for internal HR and operations support, and Inkoper.io, an AI tool for generating procurement texts. The latter is still under evaluation.

Investment measures, European Digital Innovation Hubs (EDIHs) and Synergies

The sophistication of the relevant infrastructure and the necessity for a much broader AI-native talent base, a long-term and ambitious investment regime is needed. Moreover, the coordination and synergisation of the several funding streams at EU, national and regional levels will allow for the impactful and sustained financing needed to enable the ambition of the Plan as a whole. The tightening of public budgets and the broader limitations on EU-level financing will especially emphasise the need for private sector investment. Therefore, the expansion of Public-Private Partnerships (PPPs) as can be seen in examples such as the Innovative Health Initiative (IHI) and models such as outcome-based investment, co-investment agreements, regional AI investment platforms and innovation pacts, will be crucial moving forward.

Alignment between EU-level funding schemes will also be a critical enabler for the raising of sufficient capital and the development and scaling of ventures especially in relevant thematic areas such as digital research and semiconductors. The ringfencing of Horizon Europe and MFF funding for AI activity, including regional AI research, innovation, application and adoption, serve as examples of this approach. Semiconductors, especially in the context of the EU Chips Act, are another crucial pillar of the digital sector as a whole and hence the integration of regional supply chains and ecosystems into the broader semiconductor value chain will be necessary in ensuring that regional pockets of excellence are consolidated, scaled and integrated into a robust and resilient EU chips industry.

The upcoming Multiannual Financial Framework should also provide sufficient financial resources for the entire deployment process of AI applications in public administration. The Interreg and Digital Europe programmes are important investment measures for regional projects and must be continued. One clear example is the European Digital Innovation Hubs (EDIHs). The EDIHs have the important task of bringing together all relevant stakeholders and promoting digitalisation and AI in the region. Therefore, the EDIHs and their cooperation with each other should be supported by the EU in the long term. The 2025 Call for Proposals for the EDIH Network was thus very much welcomed.

ERRIN members emphasise that the transition of European Digital Innovation Hubs into Experience Centres for AI must be co-designed with regional authorities and tailored to local needs. While EDIHs such as the one in Bourgogne-Franche-Comté have been effective in supporting SMEs, challenges remain around visibility, the provision of GenAI services and structured engagement with local and regional authorities. Similarly, Västra Götaland highlights

the importance of clear national coordination and a stronger interface between EDIHs and the EU AI Office to ensure alignment with strategic and regulatory developments.

The CitiVERSE European Digital Infrastructure Consortium (EDIC), launched to accelerate local digital twins and virtual city modelling, provides a practical example. Its collaborative model brings together cities, regions, academia, and industry to deploy interoperable, AI-enabled urban technologies. As a cross-border initiative, CitiVERSE shows how EDIHs and EDICs can evolve into integrated ecosystems that not only test but also scale AI applications across sectors such as urban planning, mobility, environment, and citizen services. The EU should leverage such examples to reinforce capacity-building and best practice exchange across regions.

With regards to case studies tied to the EDIHs implementation, Flevoland is an SME province with about 81% of its business consisting of SME activity with their digital maturity generally being on at a low level. As such, the EDIH initiative was welcomed by Flevoland as a means to guide and assist SMEs on their path to digital transformation. However, Experience Centres for AI do not fully address the diverse needs of SMEs. Experience Centres mainly draw on activity broadly aligned with the philosophy of “test before invest”. While SMEs do require a location where they can further test and develop their initiative before going to market, that is only one aspect of their drive towards digital maturity. Therefore, EDIH's should remain a one-stop shop for any and all relevant issues rather than transition towards an experience-focused approach and a sole technological pathway. Another issue that was raised was that the elevation and spreading of the EDIH’s impact may come to conflict with pre-existing networks or infrastructures with the similar goal of consolidating digital activity tied to emerging technologies such as AI. Hence, a focus on synergies with localised infrastructure rather than direct competition or duplications of effort would be well-advised.

The **European Regions Research and Innovation Network (ERRIN)** is a well-established Brussels-based platform that gathers around 120 regional organisations from more than 20 European countries. Established in 2001, ERRIN supports members to enhance their regional and local research and innovation capacities and further develop their R&I ecosystems. The network maintains a long-standing relationship with the EU institutions and other organisations to strengthen the regional and local dimension in EU Research and Innovation policy and programmes.

This response is consolidated under the **ICT Working Group,** which serves as a platform to inform, discuss and share information on ICT related strategies, initiatives and funding opportunities tied to Digital Transformation. The Working Group is facilitated by the ERRIN Secretariat and co-led by Working Group Leaders from the following Member Regions:

- The Free State of Thuringia
- Région Hauts-de-France
- Brainport Eindhoven EU Office Brussels
- Helsinki EU Office
- Region Västra Götaland

The input from our network, particularly the following, has been essential in allowing us to structure the aforementioned thematic priorities and perspectives:

- The region of Flanders (represented by VLEVA and Pharma.be), Belgium
- The Bourgogne-Franche-Comté Region, France.
- The Västra Götaland Region (VGR), Sweden
- The Oslo Region European Office, Norway
- European Office of the Metropolitan Region Frankfurt-Rhein-Main, Germany
- The Provence-Alpes-Côte d'Azur Region, France
- The Provence of Flevoland, Netherlands.

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