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Opinion of the European Economic and Social Committee

Communication from the Commission to the European Parliament and the Council – Apply AI Strategy

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1. Conclusions and recommendations

1.1. The European Economic and Social Committee (EESC) welcomes the European Commission's Apply AI Strategy as a timely and ambitious initiative to accelerate the responsible uptake of artificial intelligence (AI) across the EU and in strategic sectors, strengthening international competitiveness and growth. The Committee praises its comprehensive scope, its alignment with the human-centric approach of the AI Act, and its commitment to a robust, sovereign and globally competitive European AI ecosystem. The EESC calls for effective measures to ensure trust in AI, including transparency and accountability mechanisms to protect consumers from opaque AI decision-making.

1.2. The EESC highlights areas to improve the strategy's impact and inclusiveness. It calls for concrete, rapidly deployable measures to speed up the commercialisation and market uptake of AI solutions – especially for SMEs and scale-ups – through simpler access to funding, less administrative burden, clearer IP rules and support for cross-border scaling in the single market, so that innovation benefits the whole economy and society.

1.3. The creation of regional competence clusters (leveraging existing European Digital Innovation Hubs) and the inclusion of currently underrepresented sectors – such as finance, tourism and e-commerce – are essential for a holistic approach.

1.4. The EESC acknowledges the importance of establishing clear definitions for AI literacy, upskilling, cross-skilling, and broader learning initiatives. This clarity is essential to address concerns regarding the integration of AI into routine operations within key sectors, particularly healthcare, defence and security, and the public sector.

1.5. The EESC recommends that the Commission prioritise regulatory clarity and proportionality, facilitate the scaling of European AI solutions and strengthen frameworks for data sharing and IP protection. Governance should ensure balanced representation and continuous feedback from all stakeholders, including employers, workers and civil society. Regulatory obligations should be proportionate to company size and avoid cumulative or duplicative compliance burdens, particularly for SMEs and innovative start-ups.

1.6. Following the withdrawal of the AI Liability Directive, the EESC stresses the importance of legal certainty for businesses and investors while at the same time protecting workers and consumers. Any future initiative on AI liability should be carefully assessed and evidence-based, with a focus on legal clarity rather than introducing fragmented new obligations.

1.7. The EESC urges the Commission to ensure that the EU's AI governance structure formally and systematically involves the social partners, civil society and SME representatives, ensuring inclusive, transparent and accountable governance. It recommends clear mandates for KPI development, monitoring, stakeholder engagement and regular evaluation of AI policy impacts, including public reporting and feedback. Stakeholder involvement should be structured, outcome-oriented and time-efficient, supporting rapid decision-making and effective implementation rather than adding new administrative layers.

1.8. The EESC calls for the next multiannual financial framework (2028-2034) to provide predictable, long-term and accessible funding for AI research, infrastructure and skills development, with dedicated instruments to support SMEs, regional innovation clusters and the transformation of digital innovation hubs into AI experience centres.

1.9. The EESC supports strategic public procurement to strengthen Europe's AI ecosystem and industrial base. Procurement frameworks should promote innovation, resilience, security and sustainability of supply, while remaining transparent, competitive and technology-neutral.

2. General comments

2.1. The European Economic and Social Committee (EESC) supports the development and use of artificial intelligence (AI) in the EU while recognising both the opportunities, such as increased productivity, and the risks for people. It therefore calls for AI to remain trustworthy, transparent and human-centric, supported by targeted education and awareness-raising to build public trust and ensure that AI serves all Europeans, including businesses, workers and civil society. The EESC highlights the relevance of Article 88 of the General Data Protection Regulation (GDPR) on data protection in employment and the need to uphold non-discrimination, fairness and respect for fundamental rights in all AI applications to prevent new inequalities.

2.2. Furthermore, an 'AI first' policy will help prioritise AI integration across sectors and foster European strategic presence at all layers of the AI stack, supporting technological sovereignty and competitiveness. It should embed a human-centric approach with gender equality, diversity and inclusion as core principles, to maximise AI's benefits while safeguarding people and avoiding the reinforcement of existing inequalities.

2.3. The European Commission's targeted approach to key sectors (sectoral flagship initiatives for healthcare, manufacturing, robotics, energy, defence, the public sector, etc.) reflects its priority to invest in the European economy. However, the EESC has identified gaps, which are addressed below.

2.4. The EESC stresses that AI trustworthiness depends not only on general ethical principles but also on sector-specific standards. It therefore encourages sectoral ethical frameworks and quality seals tailored to the risks, requirements and societal expectations of key sectors.

2.5. The EESC stresses the need for robust, well-embedded financing for AI development and deployment in the 2028-2034 multiannual financial framework (MFF). The next MFF should provide predictable, sustainable funding to deliver the Apply AI Strategy across all Member States and sectors. Dedicated resources should support AI research, business innovation, infrastructure and upskilling, especially for SMEs, start-ups and regional innovation clusters, through clear, simple criteria that ensure accessibility and tangible societal results, while promoting a balanced and inclusive digital transformation across the EU.

2.6. The EESC welcomes the proposal to turn the Apply AI Alliance into a coordination forum and to establish an AI observatory, provided this ensures coherence, societal stakeholder engagement and effective annual monitoring.

2.7. The strategy's synergies with other initiatives – building on the AI in Science Strategy and the Data Union Strategy – reflect a holistic vision for Europe's digital future. However, following the withdrawal of the AI Liability Directive, the EESC reiterates its call for a revised, comprehensive EU liability framework for AI. Legal clarity is essential to support innovation and trust, provide certainty for businesses and investors, and protect workers and consumers across the single market. The Committee urges the Commission to close liability gaps, set clear rules for AI-related damage and ensure effective consumer protection, while keeping any future initiative evidence-based and focused on clarity rather than fragmented new obligations.

3. Specific comments

3.1. *Introducing sectoral flagships* – The EESC supports the introduction of sectoral flagships as a means of driving targeted AI adoption. It makes the following sector-specific observations:

3.1.1. Healthcare, including pharmaceuticals

3.1.1.1. The EESC strongly supports the establishment of European Union AI-powered screening centres and a European Network of Expertise on AI Deployment in Healthcare.

3.1.1.2. The EESC welcomes the initiatives to accelerate AI-driven drug discovery and streamline market entry for medical devices, provided safety is not compromised. The EESC recognizes the potential and encourages the use of AI for gender diagnosis and treatment.

3.1.1.3. The Apply AI Strategy should incorporate robust awareness-raising initiatives to inform the public, enhance transparency, build trust in AI-powered healthcare and underscore the critical importance of protecting personal data throughout all processes.

3.1.2. Robotics

3.1.2.1. The focus on 'physical AI' and collaborative robotics is credible and commendable.

3.1.2.2. The strategy should more explicitly address labour market impacts, including upskilling, job transitions and social dialogue, to mitigate potential disruptions.

3.1.3. Manufacturing, engineering and construction

3.1.3.1. The emphasis on digital twins and AI-powered automation is appropriate for these labour-intensive sectors.

3.1.3.2. The strategy should highlight the dual challenge of addressing skilled labour shortages and managing the risks of workforce displacement.

3.1.4. Defence, security and space

3.1.4.1. The EESC welcomes the fact that integrating AI into the defence and space sectors is considered essential for maintaining Europe's competitiveness and security in a rapidly evolving geopolitical landscape. There is a strong focus on building sovereign capabilities, reducing external dependencies and ensuring that AI solutions are interoperable and secure by design.

3.1.4.2. While the strategy emphasises technological development, it could further address the ethical, legal and societal implications of deploying AI in defence and security contexts. The strategy could provide more detail on how to balance innovation and compliance with international humanitarian law and fundamental rights, particularly in the context of AI-enabled weapons and surveillance systems.

3.1.4.3. There is room to strengthen support for SMEs and start-ups in the defence and space sectors, ensuring that funding, procurement, and innovation pipelines are accessible beyond large, well-established companies. The strategy could also elaborate on mechanisms for cross-sectoral knowledge transfer, for example, how advances in space-based AI or cybersecurity can benefit civilian sectors and vice versa.

3.1.5. Mobility, transport and automotive

3.1.5.1. The EESC welcomes the fact that the strategy highlights the strong and growing impact of AI in this sector, from route optimisation and traffic management to advanced driver assistance systems and the development of automated and autonomous vehicles across all transport modes (road, rail, air, maritime, and inland waterways).

3.1.5.2. When it comes to the activities expected to support the AI first policy in the mobility sector, there is a need to clearly establish how to integrate AI with public transport infrastructure, particularly in less digitally mature regions, to avoid widening the digital divide further.

3.1.5.3. It is also important to address the need for harmonised standards and certification processes for AI-powered vehicles and systems, facilitating cross-border operations and market access for EU providers.

3.1.6. Electronic communications

3.1.6.1. The EESC supports the different approach taken towards the electronic communications sector, although it might be considered as a foundational sector for others. The activities identified for supporting the AI first policy are properly established, especially the creation of the European Telco AI platform.

3.1.6.2. However, primarily due to its cross-cutting nature, the strategy should further elaborate on measures to ensure cybersecurity and resilience in AI-powered communications networks, especially as these networks become more critical for other sectors (e.g. health, energy, defence, automotive).

3.1.7. Energy

3.1.7.1. As with electronic communications, the energy sector can be considered a foundational sector for many other industries. At the same time, the strategy highlights it as a critical area where AI can drive efficiency, sustainability and innovation across the entire economic value chain. The strategy recognises AI's potential to improve grid management, optimise energy consumption, facilitate the integration of renewable sources and empower both businesses and individuals to better manage their energy use.

3.1.7.2. While the strategy addresses technological advancements, it could provide more detail on how to overcome regulatory and governance fragmentation, which currently slows progress in areas like grid management and infrastructure planning. This is particularly important for the adoption of AI by smaller energy suppliers and in regions with less advanced digital infrastructure, ensuring that the benefits of AI are distributed equitably across the EU. AI and data centres are extremely energy intensive. If Europe wants to secure that they are deployed in Europe then it has to ensure a big volume of stable, low-carbon energy satisfying the demand.

3.1.8. Climate and the environment

3.1.8.1. The EESC welcomes the efforts to help communities adapt to climate change and mitigate its impacts. The strategy recognises the most important aspect of this, i.e. the importance of integrating EU-owned data (such as Copernicus) and fostering multidisciplinary approaches, which can make climate models more accurate and relevant and improve weather forecasts, risk prediction and disaster management.

3.1.8.2. Beyond awareness-raising on climate change and environmental protection, the EESC sees no further specific improvements for this sector.

3.1.9. Agri-food

3.1.9.1. The strategy highlights the transformative potential of AI in precision farming, robotics for field work and AI-driven advisory tools that provide farmers with personalised recommendations.

3.1.9.2. While the strategy addresses technological and data challenges, it could provide more details (activities) on how to overcome farmers' difficulties in adopting AI.

3.1.10. Cultural and creative sectors and the media

3.1.10.1. The EESC supports the creation of micro-studios, immersive storytelling and multilingual AI platforms.

3.1.10.2. The Committee encourages the inclusion of digital twins in cultural heritage activities.

3.1.10.3. The strategy should address the media sector more explicitly, including initiatives to combat disinformation and support media pluralism. Specifically, although the media is identified as one of the sectors, none of the activities set out relate to it.

3.1.11. Public sector

3.1.11.1. The statistics cited clearly show the need to better equip public sector institutions (including the judiciary) with appropriate AI tools to improve government efficiency. The EESC gladly supports creating an AI toolbox for administrations, launching the Public Sector AI & Interoperability Readiness Pathway (PAIR pathway) and revising the European Interoperability Framework to enable 'AI first' policies.

3.1.11.2. Given this sector's direct impact on all EU citizens, it is important to properly address the activities (education, trusted media engagements, etc.) that raise public awareness of AI's benefits within the public sector. These efforts should also include mechanisms to monitor and assess AI's societal impacts, ensuring transparency, accountability and compensation for citizens affected by automated decisions.

3.1.11.3. The EESC emphasises that transparency, explainability and effective redress mechanisms are essential to build and maintain public trust in AI-based public services. Public administrations should lead by example in adopting high ethical and professional standards, ensuring that AI deployment enhances service quality while safeguarding people's rights.

3.2. Beyond the sectoral flagship areas identified above, the EESC notes that finance, tourism and e-commerce are only mentioned as potential future areas. Given their importance for AI deployment and their relevance for SMEs, the EESC recommends including these sectors early in the Apply AI Strategy, or supporting them with clear, time-bound roadmaps for integration.

3.3. Addressing cross-cutting challenges

3.3.1. The EESC welcomes the focus on SMEs and the role of European digital innovation hubs (EDIHs) as AI experience centres. However, the strategy should further leverage EDIHs to address sector-specific needs and strengthen regional innovation, including by developing regional hubs around existing or emerging expertise. Those hubs could provide tailored support, training and resources for SMEs, enabling them to fully participate in the AI ecosystem.

3.3.2. The Apply AI Strategy properly identifies the need to develop tailored solutions for SMEs. The EESC recommends establishing a specific activity for agentic AI, aiming to help SMEs benefit from tailored, scalable solutions.

3.3.3. The EESC recognises the need to more clearly outline investment in infrastructure activities, i.e. prioritising investment in digital infrastructure (cloud, edge, connectivity) to support AI deployment at scale.

3.3.4. Once infrastructure exists and solutions are in place, we recommend establishing commercialisation, market-access and scaleup support to help EU AI solutions scale up through harmonised standards, mutual recognition and support for internationalisation.

3.3.5. While education and upskilling are rightly emphasised, it is also vital to embed AI literacy within each sectoral flagship, with tailored resources for different user groups and a focus on preserving jobs. Ensuring employees have the skills for evolving roles will protect employment and support adaptation to technological change. The EESC also highlights AI's potential to address labour shortages, improve job quality and boost productivity. Skills policies should therefore not only mitigate risks, but actively enable companies and workers to use AI for new tasks, job transformation and competitiveness.

3.3.6. The EESC stresses AI's profound impact on employment, working conditions and work organisation. The growing use of algorithmic management and automated decision-making raises key concerns about workers' rights, transparency and fair treatment. The Committee calls for an EU framework to ensure transparency and accountability in algorithmic management, safeguard workers' rights and provide effective mechanisms for social dialogue and redress. It urges special attention to job quality, occupational health and safety, data protection and lifelong learning to prevent new inequalities, while preserving company-level flexibility and social dialogue so employers and workers can adapt AI tools to sector-specific and organisational realities.

3.3.7. The strategy should address liberal professions as a distinct group, given their specific regulatory and ethical frameworks. Tailored AI measures are necessary to ensure responsible implementation, safeguard the public interest, and uphold trust in professional services.

3.3.8. The strategy should address the need for reliable, accessible and inclusive sector-specific information sources. Studies in some Member States indicate that many people currently rely on general public portals, without a structured or standardised learning approach.

3.4. *Establishing a single governance mechanism*

3.4.1. The EESC supports transforming the Apply AI Alliance into a coordination forum and establishing a multi-stakeholder-driven AI observatory.

3.4.2. The EESC welcomes the AI office, AI observatory, AI board and Apply AI Alliance as key elements of the EU's AI governance. It stresses the need for formal and meaningful involvement of the social partners, civil society and all relevant stakeholders in their design and operation to ensure policies reflect the interests and concerns of employers, workers, SMEs and the wider public, and enable effective feedback loops. Stakeholder engagement should be structured, outcome-oriented and time-efficient, supporting rapid decision-making and implementation rather than adding new administrative layers.

3.4.3. There is a need to ensure that regulatory requirements are clear and proportionate for SMEs and start-ups. At the same time, the strategy should address how to strengthen frameworks for data sharing, interoperability and intellectual property (IP) protection to enable innovation while balancing the interests of businesses and individuals. The EESC calls for clear, harmonised rules on copyright and the patentability of AI-generated outputs as well as for mechanisms to protect EU AI innovations from unfair competition and IP theft, while ensuring equal access for all to high-quality datasets for model training and cloud computing infrastructure.

3.4.4. The EESC supports the strategic use of public procurement to strengthen Europe's AI ecosystem and industrial base. Procurement frameworks should promote innovation, resilience and security of supply, while remaining transparent, competitive and technology-neutral.

3.4.5. The Apply AI Strategy should further promote the application of ethical principles in AI development and deployment, including sector-specific codes of conduct, support the creation of independent ethics boards or advisory groups at sectoral and regional levels and ensure that ethical considerations are embedded in commercialisation, procurement and investment decisions.

Brussels, 21 January 2026.

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