



| asociace spotřební elektroniky



THE SLOVAK ALLIANCE  
FOR INNOVATION ECONOMY

Bratislava, Bucharest, Prague, Tallinn, Vilnius, Warsaw, 22nd November 2018

**Position of Three Seas Initiative countries' digital industry on common policy regarding development of the digital sector and the sector of advanced technologies.**

As representatives of associations and societies acting for the largest enterprises from digital industry and the industry of advanced technologies in countries of Three Seas Initiative: Poland, Czech Republic, Slovakia, Lithuania, Estonia and Romania, we put forward an initiative of cooperation in scope of supporting creative business and shaping legal regulations, which will serve growth of innovativeness in our region of Europe. Cooperation in the region of Three Seas Initiative should not be limited to issues of energy security and development of transport sector only. While thinking prospectively, anticipating dominating factors of the economy in upcoming years, one can not ignore the market of advanced technologies and the digital economy, because their level of development will determine Europe's competitiveness against the rest of the world. It must be emphasized that the intention of a broader cooperation of digital and advanced technologies industries of Three Seas Initiative does not aim to divide the European Union. Quite the contrary – the idea will not only allow to level the playing field and unleash the dormant potential of countries in this region of Europe, but

it will also aid the development and growth of whole European market's competitiveness against global giants.

It is our common interest to support all initiatives, including propositions of legal regulations, in order for them to help the advance of the digital industry and advanced technologies industry in European union and also in Three Seas Initiative countries, for which innovation is an especially important impulse for growth of their domestic economies as well as the economy of the whole Europe's region. Given that future of our technological industry sector, which is a major stimulus for domestic economies of Central-Eastern Europe countries, is dependent on certain legal regulations developed in Brussels, we would like to make our joint voice well heard on the European arena.

It is crucial for us, especially now that the European Union is working on laws shaping the Digital Single Market. Despite righteous intentions of projects in the European agenda some of the relevant regulations can limit the creation of innovative products and services, which require using and processing data, as well as they will burden companies of the online industry with great costs.

We have been watching foregoing works on the project of Directive on Copyright in the Digital Single Market with particular concern. We fully respect privacy, authors and their legitimate rights nevertheless it must be understood that member states should have the right, **under minimum regulation**, to extend or keep the current possibility for the entrepreneurs **to have easy access to utilize TDM** - text and data mining - in scope of resources they have legal access to, without a need to acquire additional licenses. However, current regulations of the Directive would limit TDM, make it much harder and in consequence harm the growth of economy based on data and artificial intelligence in Europe. Furthermore, introducing an exception in limiting TDM only to some scientific institutions will strike at member states, especially those of Three Seas Initiative, which are often chosen by international concerns as a suitable locations for their R&D centers. **We voice our concern** that new regulations in this narrow shape will cause said **centers to be relocated outside of European Union**. Therefore, we take a common stand for maximally extending the list of entities allowed to freely use TDM.

Moreover, it must be noticed that the Directive on copyright law in its current form accepted in September by the European Parliament will also, in our assessment, **greatly limit access to information so important for citizens of our countries**, which strikes at the very base of modern information based society. We oppose the regulations, which resign from development, implementation and using of technologies for protection of rightholders and which, by introducing an obligation to filter the Internet in order to protect copyright, will both harm the development of innovative enterprises operating online and the e-commerce market as well as limit the freedom of speech of users and their artistic expression.

Decisions made in the European Union regarding the mentioned issues will soon predestine the future of digital industry, including the industry of our region of Europe and affect our countries' competitiveness in scope of innovation compared to American and Asian economies. As representatives of a large agreement in the digital sector and the sector of advanced technologies of Three Seas Initiative countries, interested in development of digital economy, education, science and civil society, we appeal to governments of our countries to support said postulates regarding projected European regulations on Digital Single Market and to oppose those who might slow down or harm this development.

*APDETIC – Romanian Association of Manufacturers and Distributors of Equipment for  
Information and Communication Technology*

*ASE - Consumer Electronics Association of the Czech Republic*

*INFOBALT Lithuanian*

*ITL - Estonian Association of Information Technology and Telecommunications*

*SAPIE - The Slovak Alliance for Innovation Economy*

*ZIPSEE “Digital Poland”*