

## Remissvar Infrastrukturdepartementet Dnr I2019/01426/D

190604

Google Sweden AB 556656-6880 tackar för möjligheten att lämna synpunkter på remiss **Dnr I2019/01426/D** Frågeställningar med anledning av en framtida digital strategi för Europa.

Nedan följer våra kommentarer, dels en övergripande inriktning men också konkreta förslag baserade på denna riktning. Vi finns givetvis tillgängliga för eventuella uppföljande frågor eller annat vi kan bistå med i arbetet.

### Inledning

Vi har börjat ana kraften i en historisk möjlighet - att tack vare en kombination av tillgång till data och datorkraft för första gången kunna **kombinera mänskligt lärande med maskinlärande**. Det innebär att kunskap kan byggas och innovation drivs på ett sätt som tidigare inte var möjligt.

Sverige har en bra startposition då svenskar har hög tillit till teknik och hög teknikpenetration. Men för att Sverige - i enlighet med regeringens ambition - ska bli bäst i världen på att ta tillvara digitaliseringens möjligheter krävs en stabil grund i form av relevant reglering på EU nivå. Google Sweden AB är därför tacksamma för att få bidra med sina tankar och perspektiv på remiss Dnr I2019/01426/D.

I ett förändrat politiskt landskap med ett mer fragmenterat Europaparlament, en ny EU-kommission i vardande samt att Brexit på ena eller andra sättet snart är en realitet har Sverige en viktig roll att spela för att få ett regleringslandskap i EU som främjar ny teknik och innovation. Statsministerns undertecknande av ett brev tillsammans med 17 andra premiärministrar och det icke papper som 19 medlemsländer publicerat där man uppmanar EU att bejaka digitalisering och säkerställa en mer innovationsvänlig regleringsmiljö<sup>1</sup> är ett utmärkt exempel på en positiv riktning för EU att ta de kommande fem åren. I detta remissvar bilägger vi våra övergripande tankar kring fokus för EU den kommande mandatperioden. Men vi återkommer gärna muntligen och skriftligen längre fram med mer detaljerade ståndpunkter i relation till frågeställningarna.

Så vilka frågor bör vara i fokus för att Sverige ska kunna bidra till att Europa realiserar sin ekonomiska potential i en digital värld och att hela EU blir en "digital frontrunner"?

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<sup>1</sup> The future development of the Single Market and European digital policy (February 2019)  
[https://www.politico.eu/wp-content/uploads/2019/02/Leaders-joint-letter-March-EUCO-260219.pdf?utm\\_source=POLITICO.EU&utm\\_campaign=e9e4a16704-EMAIL\\_CAMPAIGN\\_2019\\_02\\_27\\_05\\_48&utm\\_medium=email&utm\\_term=0\\_10959edeb5-e9e4a16704-189794717](https://www.politico.eu/wp-content/uploads/2019/02/Leaders-joint-letter-March-EUCO-260219.pdf?utm_source=POLITICO.EU&utm_campaign=e9e4a16704-EMAIL_CAMPAIGN_2019_02_27_05_48&utm_medium=email&utm_term=0_10959edeb5-e9e4a16704-189794717)



Sverige och Europas framtid behöver ses i en kontext. Den ekonomiska tillväxten och den kvalitativa jobbtillväxten fortsätter att vara låg i EU, den förväntade BNP tillväxten för 2019 kvarstår på 2.0 procent. Även om arbetslösheten minskar så är den fortsatt hög - i augusti 2018 var ungdomsarbetslösheten i Europa 14.8 procent jämfört med 16.6 procent i Augusti 2017.

När vi utvärderar EUs digitala agenda och funderar på dess inriktning framåt är den grundläggande frågan om den levererar värde för människor och företag i EU? EUs fokus på den digitala inre marknaden i DSM strategin från 2015 verkar t.ex. Inte reflekteras i förbättringar rörande upptagandet av användande av digitala tjänster i företag över EU eller som en ökning av tillgänglig arbetskraft inom ICT-sektorn. EUs globala position inom digitalisering lämnar också en del övrigt att önska. Många av EUs länder, inklusiver Sverige hamnar i eftersläntrande ledar kategorin där vi njuter av hög digital standard men upplever minskat momentum i utvecklingen.

Digitaliseringen kommer påverka våra liv och våra samhällen i lika stor utsträckning som industrialiseringen gjort. Det innebär att fantastiska möjligheter ligger framför oss. Men också utmaningar att säkerställa att möjligheterna tas tillvara på ett sätt som är långsiktigt hållbart för människor och planeten. Genom att frigöra den digitala teknologins potential kan vi öppna upp för nya och bättre jobb och nya affärsmöjligheter men också för en mer effektiv och produktiv offentlig sektor. Teknologier såsom artificiell intelligens och databearbetning i molnet utvecklas med stora språng och kan, med rätt förutsättningar, ha en positiv inverkan på hur människor i EU lever och arbetar.

Ett första steg är att EU går från ett fokus på att skapa en digital inre marknad till att möjliggöra en digitaliserad inre marknad detta för att bygga på EUs kärna och en av deras främsta styrkor för att möjliggöra nästa steg av utvecklingen inom EU.

I vårt bifogade papper fokuserar vi därför på fyra områden - där vi tror att Sverige i koalition med andra har möjlighet att leda vägen framåt för EU i en positiv inriktning; hur EU ska bli en digital ledare, hur en färdighetsbaserad agenda förbereder oss för framtidens arbetsmarknad, hur EU kan visa ledarskap inom AI samt hur vi uppnår hållbarhet i en digital era.

Hoppas detta både kan vara till inspiration och nytta. Hör av er om ni har några frågor. Vid tillfälle återkommer gärna och blir mer konkreta.

Bästa hälsningar,

Sara Övreby

Samhällspolitisk chef, Google Sverige

## Europe's economic potential in the digital world - how to become a Digital Frontrunner

### *(i) From the Digital Single Market to a 'digitized' Single Market*

25 years on from its launch in 1993, European efforts to create a Single Market and remove barriers have delivered substantive economic benefits. In 26 out of 28 EU MS, trade conducted with the Single Market accounts for at least half of the total trade (relative to GDP). In the EU, 56 million jobs depend on trade within the Single Market. As high as 23% of total employment is linked to Single Market trade<sup>2</sup> But much work remains for the EU to complete the single market and many important sectors remain substantially closed to cross-border competition. According to a group of tech sector and industry stakeholders, including from Sweden "the Single Market is more complete in theory than reality – and not prepared for a digitised economy".<sup>3</sup> Delivering the Single Market could provide €651 billion in additional benefits per year.<sup>4</sup>

Digitisation opens the door for small businesses to avail of export-led growth (particularly for services) within the EU's Single Market and provides greater choice to consumers, but only a completed Single Market will fully deliver on this potential. Thus, there is a big need for a new EU mandate that helps priorities shift from a regulation-focused Digital Single Market (DSM) to a 'digitized' Single Market focus, which emphasizes growth and jobs for Europe's businesses, particularly smaller firms.

### *(ii) Aim for an ambitious digital trade agenda and cooperate with digital partners.*

The competitiveness of the EU economy is linked to the ability of European businesses to harness the opportunities of digitisation and open digital channels to global markets. As a result, a strong commitment to the free flow of data and taking a more proactive stance on digital trade is increasingly key to business growth and export success for the EU. *The EU should find opportunities for itself to work with other digital-first countries like the US and Japan at the WTO and through digital trade delegations to combat growing digital restrictions and data localization requirements globally and with key trading partners (for example India, Vietnam, Indonesia, and Mercosur).*

### *(iii) Adopt a 'Better Regulation 2.0' framework*

A fast changing society and technology requires a sound, efficient and future-proof policy framework. A 'smart regulation' approach is necessary to respond adequately to these changes, in order to preserve the opportunities for people and businesses.

The policy measures that have emerged from the Digital Single Market strategy need to be acknowledged as a very large policy reform program, across areas as diverse as telecoms services, consumer rights, privacy, copyright, regulation of harmful content, and regulation of digital platforms. The scale of the DSM program presents challenges to national policy-makers and regulators in implementing these new measures, as well as to smaller companies in terms of achieving compliance. The EU should also be

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<sup>2</sup> 25 years of the European Single Market, Danish Business Authority (September 2018)

<https://em.dk/~media/files/2018/september/rapport--25-years-of-the-single-market.ashx?la=da>

<sup>3</sup> The future digital agenda: an industry perspective, Public First (October 2018)

<http://www.publicfirst.co.uk/wp-content/uploads/2019/05/Report-Public-First-the-future-digital-agenda-an-industry-perspective.pdf>

<sup>4</sup> European Parliamentary Research Service (EPRS), EU single market: Boosting growth and jobs in the EU (2017)

[http://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS\\_BRI\(2017\)611009](http://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_BRI(2017)611009)

conscious of the need to give businesses and in particular SMEs sufficient time to implement all the new requirements from DSM and to assess carefully what the effects of the new policy measures are.

Looking ahead, the coming EU term may be better to focus on delivering less but better legislation, based on principles for how technology should operate on a general level rather than regulating specific aspects of new technology.

The EU needs to re-state its commitment to evidence-based and future-proof policy-making with the release of a Better Regulation 2.0 strategy. New regulation needs to be necessary, proportionate, and non-discriminatory and to provide an added value for people and businesses. Some suggestions for how to do this would include:

- *Build a robust evidence base from the operation and impact of new rules (such as GDPR, and platform-to-business regulations) before moving to consider additional new rules in an area.*
- *Explore the full range of policy options - de-regulation, co-regulation, collaborative forms, and the use of principles-based initiatives - before proposing new legislation.*
- *Impact assessments (IAs) at EU level should be conducted by independent experts. IAs on different scenarios should be published before policy proposals and IAs should consider the impact on innovation. IAs should be updated when major changes are made to proposals, to ensure understanding of what those changes will result in.*

Sources of information and ideas:

- [DSM 2.0. Digital Europe: Next Steps](#) Lisbon Council (2018)
- [How ICT Can Restore Lagging European Productivity Growth](#), ITIF (October 2018)
- [Submission For USTR National Trade Estimate Report For 2019](#), Internet Association (2018)
- [US-EU negotiating objectives](#), Office of the US Trade Representative (2019)
- [Competition Law and Tech - A New Approach](#), Google (2019)
- [A Roadmap for a Fair Data Economy](#), Lisbon Council (2019)
- [Exclusionary Conduct in Data-Driven Markets](#) Max Planck Institute (2019)

## Technology and the future of work - a skills focused agenda to help workers

Technologies like AI and robotics will significantly change how we work and live in the next 10 to 20 years. A key factor for success will be how ready people in Europe are to develop, but more importantly, to make use of these new technologies. According to McKinsey, by 2030 the digital part of the economy will account for 19% of jobs in digital front-runner countries, like Sweden, up from 8% in 2017. McKinsey also expects a major shift in the type of skills needed, with technological, cognitive and interpersonal skills accounting for nearly half of work activities by 2030, compared with 37 percent in 2017.<sup>5</sup> This will require a huge change across education and training, but also in technology innovation and social policy. Training across the life-cycle will need a huge increase, with McKinsey estimating that 9% of workers will need to be re-skilled each year. This will play out at primarily at national level, but a positive EU agenda can make a huge difference to the speed of action and the reach of reform efforts. The countries and regions that

<sup>5</sup> McKinsey - Shaping the future of work in Europe's digital frontrunners (October 2017)  
<https://www.mckinsey.com/featured-insights/europe/shaping-the-future-of-work-in-europes-nine-digital-front-runner-countries>



get this right will be best placed to succeed. With strong digital adoption, a good base of skills, and robust social partnership, Sweden is well placed to lead this debate in Europe

*(i) Europe needs to show vision and leadership*

Sweden's new government made re-skilling a top priority and committed the government to help everyone "build on their knowledge and reshape their skills" and announced a series of concrete measures to boost adult education.<sup>6</sup> The EU could follow this example and set incentives for such kind of initiatives.

- *Push skills towards the top of the EU's agenda with a high level pledge - e.g. the Lisbon Council suggests a high level political pledge to "make Every European digital" and set quantifiable goals for each country and the whole EU.*<sup>7</sup>
- *Take Finland's and Sweden's plan to educate 1% of the population on AI (with Elements of AI) to the EU with a goal to train 1% of Europeans in AI.*

*(ii) Built on a strong foundation of informed dialogue and partnership*

The central idea here is to build on the Nordic Model of partnership between government, industry and trade unions. Denmark's Disruption Council brings together government, industry and trade unions to look at the possibilities and challenges of digital transformation, and contributed to the development of a new agreement on re-training.<sup>8</sup> Other new partnerships are emerging. In Finland, the leading trade union organisation SAK partnered with Demos and Google to publish a discussion paper advocating for the importance of digital skills and life-long learning, particularly in the workplace.<sup>9</sup>

- *Set up a European Future of Work Centre of Excellence to gather experts from across the EU and worldwide and from diverse stakeholders (incl trade unions, academia, and industry), produce a stream of high quality research, highlight best practice, and map supply and demand across countries / regions and sectors*

*(iii) Develop new ideas and experiment*

According to McKinsey (2017) individuals will need to significantly re-train every 10 years. This is on a massive scale but the potential return on investment for individuals, businesses and society are impressive. However our current education systems and labour regulations are not adapted to this. We need to see a systematic change to enable re-skilling several times in a person's career. Experimenting is crucial as there is not a "one size fits all" response to the challenge. Successful education and re-education requires a segmented approach based on the life cycle and circumstances of each person.

- *EU-countries can learn and adopt good ideas/experiments from each other, such as pension-type learning accounts to help workers continually re-train (France), a transition budget funded by employers (Sweden), experiments with social models to support worker transition (e.g. universal income trial in Finland) and on-the-job training and digital apprenticeships with vouchers for training (i.e. grant that supports the participation in continuing education and training).*
- *Take the 'Experimental Finland' program to the EU level with a new 'Experimental Europe' program to develop, test and promote new approaches for re-skilling workers across the EU. A fund would be created and allocated to projects through a competition format to build public awareness / interest*

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<sup>6</sup> Statement of Government Policy, Prime Minister Stefan Löfven, 21 January 2019

<https://www.government.se/speeches/20192/01/statement-of-government-policy-21-january-2019/>

<sup>7</sup> Digital Europe Next Steps (November 2018)

<https://lisboncouncil.net/publication/publication/153-digital-europe-next-steps-a-european-agenda-for-the-digital-9.html>

<sup>8</sup> Prepared for the future of work (February 2019) [https://www.regeringen.dk/media/6332/regeringen\\_disruptionraadet\\_uk\\_web.pdf](https://www.regeringen.dk/media/6332/regeringen_disruptionraadet_uk_web.pdf)

<sup>9</sup> Demos Helsinki (April 2019)

<https://www.demoshelsinki.fi/wp-content/uploads/2019/04/sak-google-keskustelupaperi--jatkuvasta-oppimisesta-totta.pdf>

Sources of information and ideas:

- [Work for a brighter future](#), ILO (2019)
- [Digital Frontrunners: Designing inclusive skills policy for the digital age](#), Nesta (2018)
- [Shaping the future of work in Europe's 9 digital front-runner countries](#), McKinsey (2017)
- [The future of work? Work of the future!](#), European Commission (2019)

## Leading on Artificial Intelligence

Artificial intelligence will be a game-changer and will have a lasting impact on the future of consumers, businesses and nation-states. AI governance must be seen as a big priority to ensure AI is developed responsibly. Governments have an important role to play and their intervention can be helpful on a number of issues that are very complex or have a big impact on society. However, industry stakeholders are also keen to see “a more agile and adaptive process for EU policy – particularly for startups and scaleups who often lack the resources to notice issues the first time round. For AI, there should be a consistent review and refit of existing legislation to remove barriers”.<sup>10</sup>

### (i) European AI Strategy.

With AI likely to have such a significant impact, there is much to benefit from a European AI strategy with a strong focus on change in key sectors. The EU should work on an A.I.-strategy that is positive, ambitious and practical and promotes leadership for the EU.

- *Draw on examples from national strategies, for example from Finland, France or Belgium. Ensure adoption of ideas by setting up an AI leadership group to drive implementation, drawing on international expertise and support.*
- *Sectoral focus is needed. A horizontal framework can only take us so far - the demands we put on AI depend very closely on what the technology should be used for (i.e. higher transparency requirements for medical use vs suggesting music).*
- *Stimulate uptake of AI within priority (industry) sectors (e.g. healthcare, clean energy, manufacturing, transport and logistics and agriculture) and help boost public confidence and understanding. This could be done by creating a common regulatory sandbox for specific applications of A.I. or by supporting interfaces that AI is built on - i.e. cloud;*
- *Identify hubs of AI excellence and growth, and prioritise the development of those area hubs with research funding, piloting and tax incentives.*
- *AI implementation needs more smart regulation: Identifying issues, crafting tailored solutions, being thoughtful about unintended consequences.*

### (ii) Lead by example and promote expertise.

The EU can play a role in stimulating the use of AI in the public sector and by doing so increase public trust in the technology and allow regulators to see first hand what is needed in terms of governance. This is echoed by industry stakeholders (including from Sweden) - “governments can be a role model, by examining how AI can improve their own operations, and building the AI talent and expertise which will be of benefit to the economy and society as a whole. Opening up the public sector to innovation will not only propel AI but demonstrate clear benefits to citizens”.<sup>11</sup>

<sup>10</sup> A way forward for the D9 in the age of AI: an industry view, Public First  
<http://www.publicfirst.co.uk/wp-content/uploads/2019/05/A-way-forward-for-the-D9-in-the-age-of-AI-v4.pdf>

<sup>11</sup> A way forward for the D9 in the age of AI: an industry view, Public First

- *Promote constructive governance frameworks and build expertise in government bodies. This is not about releasing a lot of data, but about making available good quality and useful data sets<sup>12</sup>;*
- *Encourage responsible data sharing between government institutions within and between countries to boost data available for training AI systems*
- *Make room for more 'liberal' public sector procurement to kick-start specific markets where there is not enough private capital to help A.I. solutions scale.*

*(iii) Focus on the explainability of A.I. instead of transparency.*

There is a need to define what level of explanation is needed for different uses, and different stakeholders - for example, what does a patient need vs the practitioner vs the insurance company? The EU can play a role in this field by:

- *Assemble a collection of best practice explanations along with commentary on their characteristics to provide practical inspiration. For example, the EU could set up a EU-wide multi-stakeholder coalition to share best practices.*
- *Describe minimum acceptable standards in different industry sectors and application contexts. Idea: EU to lead on setting minimum standards with support from industry partners and sectoral regulators.*

Sources of information and ideas:

- [The Ethics of Artificial Intelligence](#) Lisbon Council (2018)
- [Responsible development of AI](#), Google whitepaper (2018)
- [A way forward for the D9 in the age of AI: an industry view](#), Public First (2019)

## **Sustainability in the digital age**

2019 is an important year for putting Europe on a path to a sustainable energy future. The EU recently agreed on a package of reforms to increase energy efficiency and boost renewable energy throughout the EU, and the Finnish Presidency can help ensure that Europe leads the world in moving toward a carbon-free future.

*(i) Enhance sustainability in the ICT sector*

As electricity use of the ICT sector increases due to digitalization, it's important that resources are utilized efficiently and the sector operates as sustainably as possible. The EU could focus on the following areas:

- *Rigorous and improved standards to ensure ICT companies are continuing to improve their energy efficiency using state of the art technologies.*
- *Building sustainability requirements into public cloud services procurement, such as:*
  - *energy efficiency metrics such as power usage effectiveness (PUE)*
  - *matching electricity consumption with purchases of carbon-free energy*
  - *circular economy principles, such as maximizing use of refurbished machines, maximizing landfill diversion rates for data center equipment so that materials are reused or recycled after first use.*
  - *Requirements to publish reports on data center energy consumption and efforts to improve sustainability.*

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<sup>12</sup> See Google's approach here: <https://www.blog.google/technology/ai/sharing-open-data/>



- *Considering fiscal and non-fiscal incentives to companies to adopt cloud computing services of providers with high energy efficiency.*

*(ii) Boost corporate purchasing of renewable energy to reduce the cost of the energy transition*

Corporate renewable energy purchasing can play a significant role in helping Europe meet its renewable energy goals in an affordable way. The recently passed Renewable Energy Directive (RED II) requires Member States to finalize, by the end of 2019, National Energy and Climate Plans (NECPs) that detail how they will grow their renewable energy industries over the next decade. Member States must assess the administrative and regulatory barriers to corporate PPAs in these documents and put in place plans to remove them. The EU can highlight the significant role of corporate renewable energy purchasing and ensure that all NECPs actively promote corporate PPAs. Some ideas in this area:

- *Establish an expert task force on corporate renewable energy sourcing to advance best practices within the EU.*
- *Push Member States to prioritize corporate PPAs in their National Energy and Climate Plans, including through reforms of support schemes toward competitive auction based mechanisms that put downward pressure on prices.*
- *Push for consistency in the way national governments treat guarantees of origin (GOs) and ensure that corporate renewable energy buyers can retain the GOs associated with the electricity they purchase.*

*(iii) Advocate for greater regionalization of the European electricity grid*

Regionalization of the European electricity grid can help ensure that Europe's meets its energy goals at a reasonable cost. Regionalization allows the system to operate more efficiently through greater geographical diversity and a reduced requirement to invest in new capacity. It will also support the deployment of greater amounts of variable renewable energy, which could be balanced across a wider geographic area, reducing curtailment and redispatching costs.

Today, however, Europe's electricity grids are still largely managed and operated at the national level. The recently agreed regulation on the internal market for electricity encourages better coordination among national system operators, but more can be done to move Europe towards greater regional operation of electricity markets. Pointing to its own successful experience in the Nordpool regional electricity market, the EU can foster cooperation among other Member State governments to boost the regionalization of Europe's electricity grid. In particular, it could :

- *Launch a study on how deeper electricity market integration can help Europe reach its long-term renewable energy and decarbonization goals and the associated economic benefits of regionalization.*
- *Create expert task force to identify the legislative and regulatory enhancements needed to foster a fully integrated European electricity market.*

Sources of information and ideas:

- DG Energy case studies on corporate renewable energy (to be published in May)
- [European data centres. How Google's digital infrastructure investment is supporting sustainable growth in Europe](#), Copenhagen Economics (2018)
- [Benefits of an Integrated European Energy Market](#), Booz&Co (2013)

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