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General Secretariat

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Research
N° prev. doc.:	ST 6418/25
Subject:	Draft Council conclusions "Towards the EU strategy on AI in science" - Table with the Member States comments

Delegations will find attached a revised version of the above-mentioned table of comments including the MT comments.

Draft Council conclusions "Towards the EU strategy on AI in science" (104 rows)

From: NL, MT, LT, IT, IE, HU, FR, FI, ES, EE, DK, DE, CZ, BE, AT, SI, SE **Updated: 06/03/2025 08:09**

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
THE COUNCIL OF THE EUROPEAN UNION	
RECALLING:	
– its conclusions of 26 November 2021[1] on the Future Governance of the European Research Area (ERA);	
– its conclusions of 2 December 2022[2] on the New European Innovation Agenda;	
– its conclusions of 5 November 2024[3] on the European Court of Auditors' Special Report No. 08/2024 entitled 'EU Artificial Intelligence ambition – Stronger governance and increased, more focused investment essential going forward', stressing the need for coordinated efforts, scaled up investments and improved access to digital infrastructure for AI development;	
TAKING NOTE OF:	
– the Commission's communication on the Coordinated Plan on Artificial Intelligence (AI)[4], providing a framework for aligning Member States' strategies with EU priorities;	

1 14308/21.
2 14705/22.
3 14849/24.
4 COM(2021) 205 final

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
– the evidence review report of the Scientific Advice Mechanism to the European Union entitled "Successful and timely uptake of artificial intelligence in science in the EU" published in April 2024.	
– **the Commission's guidelines on prohibited artificial intelligence practices established by the AI Act, notably its Annex on research exemptions[5].**	DE (Drafting Suggestions): – **the Commission's guidelines on prohibited artificial intelligence practices established by the AI Act, notably its section~~Annex~~ on research exemptions[6].** DE (Comments): DE: The cited document does not have an annex.
	FR (Drafting Suggestions): – the "Statement on inclusive and sustainable artificial intelligence for people and the planet" published in February 2025. FR (Comments): French authorities believe it is essential to recall the statement adopted during the AI Summit that took place on 10-11th February 2025, since the statement has been signed by all MS and the EU.
1. RECOGNISES that rapid development of AI and AI technologies dedicated for science, which **is transforming** ~~have transformed~~ science practice and led to groundbreaking achievements and ~~creative~~ applications in science.~~, with AI being central to the discoveries awarded with recent Nobel Prizes in physics and chemistry~~.	DE (Drafting Suggestions): RECOGNISES the rapid development of AI and AI technologies dedicated for science, which **is transforming** ~~have transformed~~ science practice and has led to groundbreaking achievements and ~~creative~~ applications in science.~~, with AI being central to the discoveries awarded with recent Nobel Prizes in physics and chemistry~~.

5 C(2025) 884 final.
6 C(2025) 884 final.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	DE (Comments): DE: Editorial changes AT (Drafting Suggestions): 1. RECOGNISES that rapid development of AI as a scientific discipline and AI technologies dedicated for science, ~~which~~ **~~is~~ transforming** ~~have transformed~~ science practice and ~~led~~ leading to groundbreaking achievements and ~~creative~~ applications in science.~~, with AI being central to the discoveries awarded with recent Nobel Prizes in physics and chemistry~~.
	DE (Drafting Suggestions): 1. a RECALLS that AI has many different applications in science, including use as a versatile tool for data analysis and simulation leading to new discoveries and large language models used as a supporting tool in drafting publications and synthesizing existing knowledge DE (Comments): DE: The document should be clear that AI is a large field encompassing various methods and different applications. While the document appears, at first sight, to be neutral about the general field of AI, upon closer inspection, it seems to be quite biased towards generative AI/LLMs (directly mentioned in para 20, but also new additions of IPR/copyright in paras 19 and 27, which are primarily relevant for LLMs). Such a bias (even implicit) does not adequately reflect the potential of the whole field of AI, including logic and knowledge based AI approaches for automated tasks in industry or predictive AI like time series analyses and statistical predictions, which are essential for the energy or healthcare sectors. All these subfields of AI are absolutely central for European society and economy and would currently be implicitly left out.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(We do not oppose the relevant additions in paras 19 and 27, but rather request a clarifying para as proposed in our drafting suggestion or similar). This point is very important for us.
2. ACKNOWLEDGES the excellence of European research and innovation (R&I) in AI and its critical role in enabling cutting-edge science, **both in basic and applied research**, addressing global challenges**, enhancing competitiveness, meeting societal needs,** and driving digital transition in Europe **in an efficient and inclusive manner**.	IE (Comments): Ireland supports the amendments to this paragraph. AT (Drafting Suggestions): 2. ACKNOWLEDGES the excellence of European ~~r~~Research and ~~i~~Innovation (R&I) in AI and its critical role in enabling cutting-edge science, **both in basic and applied research**, addressing global challenges**, enhancing competitiveness, meeting societal needs,** and driving digital transition in Europe **in an efficient and inclusive manner**.
2a. Furthermore, RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should explore reciprocal partnerships with global AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development.	LT (Drafting Suggestions): **2a. Furthermore, RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should explore reciprocal partnerships ~~with global AI leaders~~ to enhance scientific exchange, interoperability, and the responsible and ethical development.** LT (Comments): Lithuania believes, that in the current geopolitical situation it essential to embark into reciprocal partnerships. Otherwise, we pose EU ecosystem at risk of being exploited by other global AI leaders who do not share our values and principles. IE (Drafting Suggestions):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	2a. ~~Furthermore,~~ RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should explore reciprocal partnerships with global AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development. ACKNOWLEDGES that the implications for EU call design will need to be considered. IE (Comments): We welcome and support the new #2a. However, the text needs to acknowledge the implications of what is proposed for how AI calls are currently designed – i.e. restrictions on who can participate. HU (Drafting Suggestions): **2a. Furthermore, RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should explore reciprocal and non-discriminatory partnerships with global AI leaders ensuring equal treatment of Member States to enhance scientific exchange, interoperability, and the responsible and ethical development.** HU (Comments): Non-discrimination and equal treatment of Member States in the EU's international relations are particularly important in light of the United States' export regulations on semiconductors, which mainly affect AI chips, placing EU Member States in different categories. 17 EU Member States fall into Tier 2 category, which means limited procurement opportunities for semiconductors. FR (Drafting Suggestions): **2a. Furthermore, RECOGNISES the importance of international AI collaboration in science, while ensuring strategic autonomy and**

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	research security. ~~EMPHASISING~~ EMPHASIZES that the EU should ~~explore~~ build on reciprocal partnerships with ~~global~~ like-minded AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development. FR (Comments): A fair balance between international collaboration and strategic autonomy and research security should be sought. Cooperation with third countries should be based on common values and principles. DK (Drafting Suggestions): **Furthermore, RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should explore reciprocal partnerships with likeminded global AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development.** DK (Comments): DK can support the addition of "likeminded" to the para. DE (Drafting Suggestions): **2a. Furthermore, RECOGNISES the importance of ~~international~~ AI collaboration in science, in particular international collaboration, EMPHASISING that the EU should explore reciprocal partnerships with global AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development.** DE (Comments): DE: Collaboration with respect to AI in and of itself, across all levels, should be emphasised first, before specifying 'international cooperation'. In other words, the strategic importance of AI collaboration should be stressed for all levels, also those below international, such as European,

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	national, regional, organisation and team. We, therefore, suggest shifting the emphasis on international to slightly later in the sentence. BE (Drafting Suggestions): **2a. Furthermore, RECOGNISES the importance of international AI collaboration in science, EMPHASISING that the EU should ~~explore~~ build on reciprocal partnerships with like-minded global AI leaders to enhance scientific exchange, interoperability, and the responsible and ethical development taking into account research and economic security issues.** BE (Comments): - The term 'explore' suggests we do not have these kinds of partnerships yet, while there are already at least four important partnerships where this plays a significant element (with Canada, Japan, Singapore, and South Korea). We thus propose to say 'build on' to reflect the reality better. - Given the current geopolitical context, as well as the uncertain behaviour of certain long-term partners, we would prefer to add the term like-minded before global AI leaders. - Especially in the context of international collaboration it is of utmost importance to take into account research and economic security.
3. STRESSES the ~~unprecedented~~ **transformative** potential of responsible**, sustainable,** ~~and~~ ethical **and inclusive** use of AI in science to stimulate groundbreaking knowledge and **drive** ~~accelerate~~ innovation deployment, **accelerate time to market,** to strengthen R&I performance of the entire Union and boost its capacity to compete globally, thus leading to significant social and economic benefits and improved Member States' ability to grow, innovate, build strategic leadership in high-impact	NL (Drafting Suggestions): 3. STRESSES the ~~unprecedented~~ **transformative** potential of AI and the need for responsible**, sustainable,** ~~and~~ ethical **and inclusive** use of AI in science. This is needed to stimulate groundbreaking knowledge and **drive** ~~accelerate~~ innovation deployment, **accelerate time to market,** to strengthen R&I performance of the entire Union and boost its capacity

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
sectors, **reinforce economic security,** and tackle challenges ~~of various backgrounds~~.	to compete globally, thus leading to significant social and economic benefits and improved Member States' ability to grow, innovate, build strategic leadership in high-impact sectors, **reinforce economic security,** and tackle challenges ~~of various backgrounds~~. NL (Comments): Also non- responsible, sustainable, and ethical and inclusive use of AI can be transformative. And that makes it all the more important that we need to focus on these aspects. ES (Drafting Suggestions): 3. STRESSES the ~~unprecedented~~ **transformative** potential of responsible**, evidence-based, sustainable,** ~~and~~ ethical **and inclusive** use of AI in science to stimulate groundbreaking knowledge and **drive** ~~accelerate~~ innovation deployment, **accelerate time to market,** to strengthen R&I performance of the entire Union and boost its capacity to compete globally, thus leading to significant social and economic benefits and improved Member States' ability to grow, innovate, build strategic leadership in high-impact sectors, **reinforce economic security,** and tackle challenges ~~of various backgrounds~~. ES (Comments): AI should not be used for its own sake, but only when there is clear evidence that it is necessary or beneficial. DE (Drafting Suggestions): 3. STRESSES the ~~unprecedented~~ **transformative** potential of responsible**, sustainable,** ~~and~~ ethical **and inclusive** use of AI in science, rooted in the principles of digital humanism, to stimulate groundbreaking knowledge and **drive** ~~accelerate~~ innovation deployment, **accelerate time to market,** to strengthen R&I performance of the entire Union and boost its capacity to compete globally, thus leading to significant social and

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	economic benefits and improved Member States' ability to grow, innovate, build strategic leadership in high-impact sectors, **reinforce economic security,** and tackle challenges ~~of various backgrounds~~. DE (Comments): DE: We support the addition suggested by AUT. AT (Comments): See comment on para 20.
	IT (Drafting Suggestions): 3. bis CONSIDER also the possible risks of irresponsible and unethical use of AI in science, which could lead to misinformation, biased decision-making, and unforeseen societal disruptions, ultimately hindering genuine innovation and exacerbating inequalities.
~~4. HIGHLIGHTS a growing number of European researchers and entrepreneurs who are already harnessing AI in their pioneering projects.~~	
5. CONSIDERING that AI systems and models specifically developed and put into service for the sole purpose of scientific research and development as well as research testing and development activity regarding AI systems or models **prior to their being placed on the market or put into service** are exempt from the AI Act[7], ~~emphasising the freedom of science and flexibility to enable exploratory and innovative activities~~.	LT (Drafting Suggestions): 5. CONSIDERING that AI systems and models specifically developed and put into service for the sole purpose of scientific research and development as well as research testing and development activity regarding AI systems or models **prior to ~~their~~ being placed on the market or put into service** are exempt from the AI Act[8], ~~emphasising the freedom of science and flexibility to enable exploratory and innovative activities~~. LT

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[7] OJ L, 2024/1689, 12.7.2024, p.1.
[8] OJ L, 2024/1689, 12.7.2024, p.1.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Comments): Grammar suggestion DK (Comments): DK would like to understand what is meant by AI systems. BE (Drafting Suggestions): 5. CONSIDERING that AI systems and models specifically developed and put into service for the sole purpose of scientific research and development as well as research testing and development activity regarding AI systems or models **prior to their being placed on the market or put into service** are exempt from the AI Act[9], remaining however within the boundaries of responsible and ethical use of green AI, ~~emphasising the freedom of science and flexibility to enable exploratory and innovative activities~~. BE (Comments): Same argument as last time. The paragraph otherwise creates the impression that everything is possible for AI in science which is not the case.
6. NOTES that the EU currently has no dedicated and systemic policy to facilitate the uptake of AI in science; such a policy **should** ~~could~~ connect and complement existing **and upcoming** AI initiatives to boost the uptake of AI in science and provide for new, better targeted **actions** ~~policies~~ regarding its application.	ES (Comments): It would be useful to define what do we consider "the uptake of AI in science" (use of AI in science as a research tool, research on AI, technological transfer of AI, attracting AI talent to Europe, etc.). This would help understand the scope of the document CZ (Drafting Suggestions):

[9] OJ L, 2024/1689, 12.7.2024, p.1.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	6. NOTES that the EU currently has no dedicated and systemic policy to facilitate the uptake of AI in science; such a policy **should** ~~could~~ connect and complement existing **and upcoming** AI initiatives and instruments, such as European Digital Infrastructure Consortia (EDIC) or European Digital Innovation Hubs (EDIH), to boost the uptake of AI in science and provide for new, better targeted **actions** ~~policies~~ regarding its application. CZ (Comments): We would like to point out that the draft Council conclusions do not mention the European Digital Infrastructure Consortia (EDIC), which could play a key role in supporting AI research activities across the EU.
7. **ACKNOWLEDGES** ~~CALLS therefore on~~ the Commission**'s** ~~to~~ work on a **forthcoming** European strategy ~~to accelerate responsible uptake~~ of AI in science, **based on the best available knowledge and practice and** in close cooperation with the Member States and **the research and innovation (R&I) community** ~~based on the best available knowledge~~.	NL (Drafting Suggestions): 7. **ACKNOWLEDGES** ~~CALLS therefore on~~ the Commission**'s** ~~to~~ work on a **forthcoming** European strategy~~-~~ to accelerate ~~-~~responsible and ethical uptake of AI in science, **based on the best available knowledge and practice and** in close cooperation with the Member States and **the research and innovation (R&I) community** ~~based on the best available knowledge~~. IE (Drafting Suggestions): 7. **ACKNOWLEDGES** ~~CALLS therefore on~~ the Commission**'s** ~~to~~ work on a **forthcoming** European strategy ~~to accelerate responsible uptake~~ of AI in science, **based on the best available knowledge and practice and** in close cooperation with the Member States and **the research and innovation (R&I) community** ~~based on the best available knowledge~~. IE (Comments):

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	We welcome the explicit reference to the R&I community. It is important that R&I actors in both the public and private sector are included and reflected. AT (Drafting Suggestions): 7. **ACKNOWLEDGES** ~~CALLS therefore on~~ the Commission**'s** ~~to~~ work on a **forthcoming** European strategy ~~to accelerate responsible uptake~~ of trustworthy AI in science, **based on the best available knowledge and practice and** in close cooperation with the Member States and **the research and innovation (R&I) community** ~~based on the best available knowledge~~. SI (Drafting Suggestions): 7. **ACKNOWLEDGES** ~~CALLS therefore on~~ the Commission**'s** ~~to~~ work on a **forthcoming** European strategy ~~to accelerate responsible uptake~~ of AI in science, **based on the best available knowledge and practice and** in close cooperation with the Member States and **the research and innovation (R&I) community** ~~based on the best available knowledge~~. ***In this respect, takes into consideration the current and planned activities of the European Commission, such as MLE on National Policies for AI in Science and ERA Action on AI in Science*** SI (Comments): The MLE on the exact same topic as the CCs address should be mentioned somewhere in the text. Alternatively, we could also add it to the recitals under the part "TAKING NOTE OF…"
8. HIGHLIGHTS that this strategy should in particular:	IE (Drafting Suggestions): 8. HIGHLIGHTS the priorities from a Member State perspective that need to be reflected ~~that~~in this strategy, ~~should~~ in particular: IE

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Comments): We suggest that we should be more explicit that the main purpose of these Conclusions is to set out the priorities for MS to help inform the preparation of the Commission strategy. The order of the issues listed here needs to be revisited. There is also scope to streamline them. FR (Comments): In general, we would advocate emphasizing 2-3 general objectives for the strategy. Some bullet points of this para relate rather to a means to achieve key objectives than a goal in itself.
– **support the development of an interdisciplinary research ecosystem around AI in science;**	NL (Drafting Suggestions): – **support the development of an interdisciplinary and where beneficial transdisciplinary research ecosystem around AI in science;** NL (Comments): We should not forget the co-creation with societal partners and other actors. IE (Drafting Suggestions): - ensure a greater focus on the application of AI in science and how it can be used and exploited to drive competitiveness, support social progress, develop world-class goods and services, enable EU companies to scale up and compete successfully on global markets; – **support the development of an interdisciplinary research ecosystem around AI in science;** IE (Comments):

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	We recognise that the focus of the CCs is on AI in science but there needs to be a greater focus on how we use AI for social progress but more importantly to drive competitiveness, the development of world-class goods and services and creation of companies of sufficient scale to compete successfully on global markets. We suggest the addition of a new bullet. DK (Drafting Suggestions): **support the development of an interdisciplinary research ecosystem around AI in science, including from the social and human sciences;** DK (Comments): DK suggests to move SSH from para 9 to para 8. BE (Drafting Suggestions): – ~~support the development of an interdisciplinary research ecosystem around AI in science;~~ BE (Comments): Is this practically feasible ? AI can be applied virtually in any field of research. So there will be not one, but multiple interdisciplinary ecosystems, which will eventually go their own way separate from the rest. We would suggest to delete this or change the wording to 'ecosystemS'. AT (Drafting Suggestions): – **support the development of a~~n~~ multi--, trans- and interdisciplinary research ecosystem around AI in science;**
	SI (Drafting Suggestions):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	take into consideration and coordinate with other EU relevant activities and strategies in open science, research careers and research assessment SI (Comments): The foreseen strategy should explicitly refer to the existing ERA policies on open science, research careers in research evaluation, as they all address issues, related to AI in Science. It is highly significant that these measures be taken into account in order to avoid duplication of efforts.
– enhance coordinated policy developments at the EU and national levels**,** for **an** increased responsible**, ethical and inclusive** use of AI in science;	BE (Drafting Suggestions): – enhance coordinated policy developments at the EU and national levels**,** for **an** increased responsible**, ethical and inclusive** use of green AI in science;
– provide for an efficient way of monitoring the impact of AI on the scientific process;	MT (Drafting Suggestions): – provide for an efficient way of monitoring the impact of AI on the scientific process **where appropriate, aligning monitoring frameworks with the EOSC's federated approach to foster consistency across Member States;** MT (Comments): Malta suggests adding a light reference to EOSC's federated model to ensure that smaller Member States, like Malta, can integrate data-gathering and monitoring processes with broader EU initiatives, avoiding unnecessary duplication. BE (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	Our question remains: How will that be organised in practice ? We are worried that this represents again an extra monitoring burden. What is the goal ?
– work on upskilling **and reskilling** researchers **and research professionals** to ~~equally~~ benefit from AI-based solutions ~~to accelerate research productivity in the EU~~;	FR (Drafting Suggestions): ~~– work on upskilling **and reskilling** researchers **and research professionals** to equally benefit from AI-based solutions to accelerate research productivity in the EU;~~
– promote **responsible,** ~~an~~ ethical, **sustainable and inclusive** ~~approach and transparent and responsible~~ use of AI-based systems, solutions and tools applicable in R&I;	NL (Drafting Suggestions): – promote **responsible,** ~~an~~ ethical, **sustainable and inclusive** ~~approach and transparent and responsible~~ use of AI-based systems, solutions and tools applicable in R&I **favouring open source where feasible, and in line with open science**;
– support open access to reliable data based on FAIR principles (findability, accessibility, interoperability, reusability) **while ensuring robust security measures to protect sensitive information and uphold data integrity**;	FR (Drafting Suggestions): ~~– support open access to reliable data based on FAIR principles (findability, accessibility, interoperability, reusability) **while ensuring robust security measures to protect sensitive information and uphold data integrity**;~~ BE (Comments): We support the additional language on security measures here and would encourage also referring to this more consequentially throughout the text. SE (Drafting Suggestions): – support open access to reliable data based on FAIR principles (findability, accessibility, interoperability, reusability) **while ensuring**

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	~~robust~~ proportionate, precise and effective **security measures to protect sensitive information and uphold data integrity**; SE (Comments): It is important that this para is coherent with the council conclusions on research security.
– enhance interconnectivity **and interoperability** between relevant strategic infrastructure and resources.	NL (Drafting Suggestions): – enhance interconnectivity **and interoperability** between relevant strategic (Research) infrastructures and resources. FR (Drafting Suggestions): ~~– enhance interconnectivity **and interoperability** between relevant strategic infrastructure and resources.~~ SI (Comments): Still not sure that the scope of the AI strategy should cover all critical infrastructure.
	DE (Drafting Suggestions): – foster and stabilise practice-oriented structures to realise the goals highlighted above with a focus on leveraging synergies through, for example, overarching initiatives, accelerators and other schemes. DE (Comments): DE: We believe this point regarding practical orientation and implementation must be added to the normative goals. Collaboration requires structures that make this collaboration possible and thereby leverage synergies. This point also resonates, among other things, with the outcome of the AI Action Summit and the commitments there to the

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Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	European AI incubator and partnerships on topics such as sustainability in AI.
Coordinated policy and support for AI in science	
9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of, interdisciplinary research community around AI in science, bringing together domain scientists, **including from the social and human sciences , and** ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~	MT (Comments): Malta requests more information on the 'interdisciplinary research community' mentioned in this paragraph, its composition, mandate and expected outputs. LT (Drafting Suggestions): 9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of, interdisciplinary research community around AI in science, bringing together domain scientists, **including from the social sciences and humanities ~~sciences~~ , and** ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~ LT (Comments): Suggestion using more common wording IT (Drafting Suggestions): 9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of, interdisciplinary research community around AI in science, bringing together domain scientists, **including from the social and human sciences**; these disciplines will help to understand ethical and cultural implications, preserving heritage and diversity. IE (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	We strongly support the inclusion of the reference to SSH. This is a very important part of a multidisciplinary approach to trustworthy AI. DK (Drafting Suggestions): STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of, interdisciplinary research community around AI in science, bringing together domain scientists with data experts and HPC specialists to create the necessary collaborations needed for AI in science. ~~**including from the social and human sciences , and**~~ ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~ DK (Comments): Like others, DK would like to highlight in particular the key specialist domains to come together. DK therefore suggests to add data management specialist and HPC specialists to the para. BE (Drafting Suggestions): 9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of~~,~~ interdisciplinary research communities~~y~~ around AI in science, bringing together domain scientists, **including from the social and human sciences , and** ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~ BE (Comments): See above. We are not sure if this is the way forward as AI can be used in virtually any scientific domain. So there would be many interdisciplinary combinations possible making "an" interdisciplinary community pointless. Inevitably there will be many (and probably dynamically evolving) interdisciplinary communities.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	AT (Drafting Suggestions): 9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of the multi-, trans- and~~-~~ interdisciplinary research community around AI in science, bringing together domain scientists, **including from the social and human sciences , and** ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~ SI (Drafting Suggestions): 9. STRESSES the importance of a common European agenda for AI in science, and INVITES the Commission to support the development of, interdisciplinary research community around AI in science, bringing together domain scientists, **including from the social and human sciences, ~~and~~** ***as well as data and*** ~~using~~ AI ~~and computer~~ scientists~~, in line with the Union's strategic interest.~~ SI (Comments): The role of data scientist is often overlooked, even though their expertise and knowledge is instrumental in developing new technological solutions.
10. NOTES the importance of funding, data, computational power ~~and~~ scientific talent **and skills** for EU competitiveness in AI and INVITES the Commission to propose innovative ways **to** ~~for~~ support~~ing~~ **appropriate** access to these resources by **the R&I community** ~~scientists~~.	MT (Drafting Suggestions): 10. NOTES the importance of funding, data, computational power ~~and~~ scientific talent **and skills** for EU competitiveness in AI and INVITES the Commission to propose innovative ways **to** ~~for~~ support~~ing~~ **appropriate** access to these resources by **the R&I community** **across the whole European Research Area.** ~~scientists~~. MT (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	Malta wishes to see emphasis on access across the whole European Research Area. Towards ensuring that the Innovation Divide is not further deepened and the EU's scientific capabilities are developed holistically, accessibility to cutting-edge AI-based resources and technologies should include participation from research ecosystems in Member States with nascent R&I infrastructure such as the Widening States by design. LT (Comments): We find this para a bit confusing is as it covers quite different topics (from skills to computational power) and it is not entirely clear from this sentence what Commission is actually invited to do. DK (Comments): DK request more information on what is meant by appropriate access. BE (Comments): What is meant with 'appropriate access'?
11. TAKES NOTE of the idea of the creation of the EU AI Research Council, as announced by the President of the Commission, and CALLS on the Commission to **work with** ~~consult~~ Member States on the details of this initiative**, in particular its mission and governance to make the best use of existing initiatives and structures**.	NL (Comments): A distributed approach in Europe should be explored as well besides this centralized initiative, because there are currently many initiatives that could be strengthened instead, for example EuroHPC, EOSC. Centralizing AI research coordination requires a long time to set up, significant funding, long-term political commitment and may introduce unnecessary bureaucracy. AI evolves rapidly, flexibility and efficiency are crucial. LT (Drafting Suggestions): 11. TAKES NOTE of the idea of the creation of the EU AI Research Council or similar structure, as announced by the President of the Commission, and CALLS on the Commission to **work with** ~~consult~~

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	Member States on the details of this initiative**, in particular its mission and governance to make the best use of existing initiatives and structures**. LT (Comments): Our understanding is that it is not entirely clear what would be the exact name of such a structure, therefore we suggest keeping it more flexible.
12. **HIGHLIGHTS the need** ~~ENCOURAGES Member States~~ to align or, where appropriate, create dedicated **national or regional** strategies for AI in science, leveraging synergies with broader AI initiatives both at national and European levels. **NOTES the potential of the development of sector-specific roadmaps, mapping and monitoring of upcoming initiatives for avoiding duplication and fragmentation.**	HU (Drafting Suggestions): 12. **HIGHLIGHTS the need** ~~ENCOURAGES Member States~~ to align or, where appropriate, create dedicated **national or regional** strategies for AI in science, leveraging synergies with broader AI initiatives both at national and European levels. **NOTES the potential of the development of sector-specific roadmaps, mapping and monitoring of upcoming initiatives for avoiding duplication and fragmentation and to ensure a balanced distribution of resources.** HU (Comments): We suggest supplementing point 12 to strengthen the fair distribution of EU resources across different MSs and regions of the EU. FR (Drafting Suggestions): 12. **HIGHLIGHTS the need** ~~ENCOURAGES Member States~~ to align or, where appropriate, create dedicated **national or regional** strategies for AI in science, leveraging synergies with broader AI initiatives both at national and European levels. **NOTES the potential of** ~~**the development of sector-specific roadmaps,**~~ **mapping and monitoring of upcoming initiatives for avoiding duplication and fragmentation.** FR (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	Although the sectoral dimension is important, the development of sectoral roadmaps has more to do with identifying fields of application for AI, and therefore has little to do with Conclusions on the use of AI in science. In addition, the French authorities would like to point out that fundamental research is not directly part of a predefined sector, but remains essential to the development of AI. FI (Comments): Before approving sector-specific roadmaps in the text, we would like to gain better clarity what is meant by them. DE (Drafting Suggestions): 12. **HIGHLIGHTS the need** ~~ENCOURAGES Member States~~ to align or, where appropriate, create dedicated **national or regional** strategies for AI in science, leveraging synergies with broader AI initiatives both at national and European levels. **NOTES the potential of the development of sector-specific roadmaps, mapping and monitoring of upcoming initiatives for avoiding duplication and fragmentation**, provided efficient and streamlined reporting processes are employed**.** DE (Comments): DE: We support the objective of better alignment. However, in recent years, processes for alignment in AI initiatives have led to numerous reports on similar topics to be submitted by MS, with minimal reuse of collected data. This creates a large overhead, which can and should be avoided. Otherwise, the existing potential of alignment will not be used. BE (Drafting Suggestions): 12. **HIGHLIGHTS the need** ~~ENCOURAGES Member States~~ to align or, where appropriate, create dedicated **national or regional** strategies for AI in science, leveraging synergies with broader AI

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	initiatives both at national, regional and European levels. **NOTES the potential of the development of sector-specific roadmaps and the, mapping and monitoring of upcoming initiatives for avoiding duplication and fragmentation.** BE (Comments): Add 'and the' to make the sentence more clear, since only the mapping and the monitoring will avoid duplication and fragmentation.
~~13. HIGHLIGHTS the need of better alignment between EU and national AI strategies, including the development of sector-specific roadmaps, mapping and monitoring of upcoming initiatives to avoid duplication and fragmentation.~~	
14. CALLS for improved coordination between AI foundation models **and broader methodologies** developed for science at the Member State level and those initiated by the Commission to maximise impact and **ensure their complementarity** ~~avoid duplication~~.	HU (Drafting Suggestions): 14. CALLS for improved coordination **and exchange** between AI foundation models **and broader methodologies** developed for science at the Member State level and those initiated by the Commission to maximise impact and **ensure their complementarity** ~~avoid duplication~~. HU (Comments): We propose not only coordination but also exchange to make better use of AI tools already developed. ES (Drafting Suggestions): 14. CALLS for improved coordination between AI ~~foundation~~ models **and broader AI based methodologies** developed for science at the Member State level and those initiated by the Commission to maximise impact and **ensure their complementarity** ~~avoid duplication~~. ES (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	Models can be foundational or not. BE (Drafting Suggestions): 14. CALLS for improved coordination between AI resources ~~developed~~ ~~foundation models~~ **and broader methodologies** developed for science at the Member State level and those initiated by the Commission to maximise impact and **ensure their complementarity** ~~avoid duplication~~. This is particularly relevant for the EuroHPC centers (and the AI Factories initiative), the EOSC and other European Research Infrastructures. BE (Comments): Why the stress on foundational models? This is not the only form of AI. This also better aligns with our second proposal with regard to avoiding duplication with EuroHPC and other relevant EU initiatives. Also, AI foundational models does not align with the terminology used in the AI Act ('General Purpose AI Models')
	ES (Drafting Suggestions): 14a. HIGHLIGHTS the need to align AI regulations to ensure that the regulatory framework is coherent and balances the necessary guarantees of security and protection of people's rights with the agility and flexibility of digital technologies and innovation processes. ES (Comments): This proposal is of particular importance for R&D&I in Health, which requires secure processing spaces and sand boxes, essential for the development and deployment of AI.
Upskilling and reskilling of the R&I community ~~researchers and innovators~~	

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
15. CALLS on the Commission, Member States, and the European R&I community**yies** at large to support ~~talents for~~ the development of **trustworthy** "made in Europe' AI solutions and ~~for~~ increased **and responsible** use of AI in science, and **continue** ~~to~~ work**ing** on **developing,** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through the development of networks and exchange programmes for graduate and doctoral students and the ERA Talent Platform.**	FR (Drafting Suggestions): 15. CALLS on the Commission, Member States, and the European R&I ~~community**yies**~~communi**ies** at large to support ~~talents for~~ the development of **trustworthy** "made in Europe' AI solutions and ~~for~~ increased **and responsible** use of AI in science. STRESSES the need to ~~and **continue** to~~work further ~~work**ing**~~ on **developing existing and new policies and schemes for~~,~~** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through strategies to boost the attractiveness of the EU, the development of networks and exchange programmes for graduate students and ~~doctoral students~~PhD candidates and the ERA Talent Platform.** FR (Comments): Efforts are already ongoing to form talents within the EU, but more could be done to attract worldwide talents by boosting the attractiveness of the EU. ES (Drafting Suggestions): 15. CALLS on the Commission, Member States, and the European R&I community**yies** at large to support ~~talents for~~ the development of **trustworthy** "made in Europe' AI solutions and ~~for~~ increased, evidence-based **and responsible** use of AI in science, and **continue** ~~to~~ work**ing** on **developing,** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through the development of networks and exchange programmes for graduate and doctoral students and the ERA Talent Platform.** ES (Comments): As per para.3 DE

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Drafting Suggestions): 15. CALLS on the Commission, Member States, and the European R&I community~~ies~~ at large to support ~~talents for~~ the development of **trustworthy** ~~"made in Europe'~~ AI solutions "made in Europe" and ~~for~~ increased **and responsible** use of AI in science, and to **continue** ~~to~~ work**ing** on **developing,** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through the development of networks and exchange programmes for graduate and doctoral students and the ERA Talent Platform.** DE (Comments): DE: Editorial BE (Drafting Suggestions): 15. CALLS on the Commission, Member States, and the European R&I community~~ies~~ at large to support ~~talents for~~ the development of **trustworthy** "made in Europe' green AI solutions and ~~for~~ increased **and responsible** use of AI in science, and **continue** ~~to~~ work**ing** on **developing,** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through the development of networks and exchange programmes for graduate and doctoral students and the ERA Talent Platform.** AT (Drafting Suggestions): 15. CALLS on the Commission, Member States, and the European R&I community~~ies~~ at large to support ~~talents for~~ the development of **trustworthy** "made in Europe' AI solutions and ~~for~~ increased **and responsible** use of AI in science, and **continue** ~~to~~ work**ing** on **developing,** attracting, retaining, and bringing **back** AI research and innovation talent ~~back~~ to Europe, **including through the development of networks and exchange programmes for graduate and doctoral**

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	students as well as postdoctoral mobility schemes and the ERA Talent Platform. AT (Comments): Please consider postdoctoral mobility schemes, too (see: "Choose Europe"). SI (Comments): What is meant by networks and exchange programmes for graduate and doctoral students? It is Erasmus and MSCA or other instruments beyond those? If so, consider making it more explicit.
16. EMPHASISES the need for comprehensive upskilling and reskilling programmes in AI, **considering the specific needs of** ~~dedicated to~~ researchers**, research support staff** and innovators, in order to **increase** ~~broaden~~ researchers' **capacity** ~~readiness~~ to benefit from AI opportunities, secure their ~~equal and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind.	NL (Drafting Suggestions): 16. EMPHASISES the need for comprehensive upskilling and reskilling programmes in AI, **considering the specific needs of** ~~dedicated to~~ researchers**, research support staff** and innovators, in order to **increase** ~~broaden~~ researchers' **capacity** ~~readiness~~ to benefit from AI opportunities, secure their ~~equal and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind**, while also empowering citizens to contribute to scientific research through AI-driven Citizen Science**.~~-~~ FR (Drafting Suggestions): 16. EMPHASISES the need for broader access of researchers, research support staff and innovators to adequate AI resources (e.g. infrastructure, platforms, funding), including through comprehensive upskilling and reskilling programmes in AI, **considering their specific needs** ~~**of** dedicated to researchers**, research support staff** and innovators~~, in order to **increase** ~~broaden~~ researchers' **capacity** ~~readiness~~ to benefit

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	from AI opportunities, secure their ~~equal and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind. FR (Comments): Although the implementation of 'reskilling' programmes could accelerate the use of AI by researchers and innovators, the difficulty of access to adequate resources (infrastructure, platforms, funding) is an even greater obstacle. This paragraph should be reworded to avoid giving the impression that researchers are responsible, through their lack of training, for the non-adoption of AI practices. DE (Drafting Suggestions): 16. EMPHASISES the need to transform universities and for comprehensive upskilling and reskilling programmes in AI, **considering the specific needs of** ~~dedicated to~~ researchers**, research support staff** and innovators, in order to **increase** ~~broaden~~ researchers' **capacity** ~~readiness~~ to benefit from AI opportunities, secure their ~~equal and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind. DE (Comments): DE: With regard to the education and training aspects, it could be made clearer that higher education institutions are also facing a far-reaching transformation process that should be driven forward swiftly. BE (Drafting Suggestions): 16. EMPHASISES the need for broadly implemented introductory courses, comprehensive upskilling and reskilling programmes in AI, **considering the specific needs of** ~~dedicated to~~ researchers**, research support staff** and innovators, in order to **increase** ~~broaden~~ researchers' **capacity** ~~readiness~~ to benefit from AI opportunities, secure their ~~equal~~

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	~~and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind. BE (Comments): There is a difference between junior researchers and already established ones, also in how they acquire novel AI skills. We therefore propose to also mention 'introductory courses'. In our view this should become part of the regular curriculum in a bachelor or master programme where the "fundamentals" of AI are taught- cf. how courses on statistics are part of the basic education of most scientific disciplines and curricula. Upskilling and reskilling is more for doctoral schools and training sessions (and more oriented on specific tools and techniques). AT (Drafting Suggestions): 16. EMPHASISES the need for comprehensive upskilling and reskilling programmes in AI, **considering the specific needs of** ~~dedicated to~~ researchers**,** ~~**research support staff**~~ research managers and support professionals and innovators, in order to ~~**increase** broaden researchers' **capacity** readiness~~ **leverage** their technical proficiency to benefit from AI opportunities, secure their ~~equal and~~ fair access to new knowledge and new technologies, and enable the transition of working methods in R&I**, as appropriate,** that leaves no one behind. AT (Comments): See Council Conclusions on *"Strengthening the competitiveness of the EU, reinforcing the European Research Area and overcoming its fragmentation"* (November 2024), where it says in para 16: *„research managers and support professionals"*

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
17. ENCOURAGES Member States**, in accordance with their national competencies,** to support **higher education,** ~~vocational~~ training and lifelong learning initiatives to meet the growing demand for AI expertise**, in science, including relevant market needs**.	LT (Drafting Suggestions): 17. ENCOURAGES Member States**, in accordance with their national competencies,** to support **higher education,** ~~vocational~~ training and lifelong learning initiatives to meet the growing demand for AI expertise~~,~~ **in science, including relevant market needs**. LT (Comments): Grammar suggestion HU (Drafting Suggestions): 17. ENCOURAGES Member States**, in accordance with their national competencies,** to support **higher education,** ~~vocational~~ training and lifelong learning initiatives **with specific measures to bridge the digital skills gap in order** to meet the growing demand for AI expertise**, in science, including relevant market needs**. HU (Comments): It is important that researchers and innovators from MSs belonging to moderate and emerging innovators are empowered through training to benefit from AI expertise. EE (Drafting Suggestions): 17. ENCOURAGES Member States**, in accordance with their national competencies,** to support **higher education,** ~~vocational~~ vocational education training and lifelong learning initiatives to meet the growing demand for AI expertise**, in science, including relevant labour market needs**. EE (Comments): EE would encourage to use Vocational education and training or to exclude the reference to training since training on its own is already part

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	of lifelong learning. Also it would be worth to emphasize which market is meant here. DE (Comments): DE: It is unclear what "including relevant market needs" means here. Please clarify. If it is about adapting higher education content to broad market needs rather the demand for expertise in science, it does not fit the scope of this document (AI in science) and should be deleted. BE (Drafting Suggestions): 17. ENCOURAGES Member States**, in accordance with their national competencies,** to support **higher education,** ~~vocational~~ training and lifelong learning initiatives to meet the growing demand for AI expertise**, in science, including relevant market needs**. BE (Comments): Why was vocational deleted? This is the usual term used for professional training and this aspect is missing for us now. SI (Drafting Suggestions): 17. ENCOURAGES Member States**, in accordance with their national competencies,** to support ***secondary and*** **higher education,** ~~vocational~~ training and lifelong learning initiatives to meet the growing demand for AI expertise**, in science, including relevant market needs**. SI (Comments): The support and awareness raising should be done at secondary education already in order to promote increased enrolment in HE studies in the field.
18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures **and computer**	LT (Drafting Suggestions):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
facilities for all researchers interested in AI use in science~~,~~**.** **STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination**. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities.	18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures ~~and computer facilities~~ for all researchers interested in AI use in science~~,~~**.** **STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination**. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities. LT (Comments): We believe that computer facilities are part of digital infrastructure. HU (Drafting Suggestions): 18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures **and computer facilities** for all researchers from all Member States interested in AI use in science~~,~~**.** **STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination**. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities. FR (Drafting Suggestions): 18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures **and computer facilities** for all researchers and innovators interested in AI use in science, taking into account economic and research security~~,~~**.** **STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination**. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	FR (Comments): Support to BE proposal. BE (Drafting Suggestions): 18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures **and computer facilities** for all researchers and innovators interested in AI use in science taking into account economic and research security~~,~~**. STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination**. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities to support gender balance and participation of underrepresented groups. BE (Comments): Please add innovators to increase link with valorisation. AI is considered to be a critical technology, so only stressing openness is not prudent. Like NL: we would like to put more emphasis on the participation of women in AI and science, while this can positively influence the quality of AI-systems and it could prevent the prevalence of gender bias. AT (Drafting Suggestions): 18. HIGHLIGHTS the need to support **fair,** open and transparent access to technologies, **digital** ~~data~~ infrastructures **and computer facilities** for all ~~researchers~~ interested in AI use in science~~,~~**. STRESSES** ~~and to address gender inequalities in AI use for scientists~~ **that**

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	developments in AI technologies should avoid bias, gender prejudice, or other forms of discrimination. CALLS FOR programmes to support underrepresented groups in STEM and AI research through**, for example,** mentorship and funding opportunities.
Ethical, sustainable, inclusive and human-centric approach	
19. **RECOGNISES** ~~NOTES~~ that the AI uptake in science carries risks stemming from the tool's technical limitations, intentional or unintentional misuse, data manipulation, generation ~~reproduction~~ of factual errors, unethical algorithms **and models** design, **overreliance, and concerns related to explainability, data protection and intellectual property,** and other issues that might erode the reliability**, reproducibility** and integrity of research practices.	ES (Drafting Suggestions): 19. **RECOGNISES** ~~NOTES~~ that the AI uptake in science carries risks stemming from the technological ~~tool's technical~~ limitations, intentional or unintentional misuse, data manipulation, generation ~~reproduction~~ of factual errors, unethical algorithms **and models** design, automation bias ~~**overreliance**~~**, and concerns related to explainability, data protection and intellectual property,** and other issues that might erode the reliability**, fairness, reproducibility** and integrity of research practices.
	DE (Drafting Suggestions): 19a: POINTS OUT that the possible benefits and risks from using AI must always be weighed with the possible benefits and risks from not using AI in order to reach an ethically thorough assessment of the options at stake. 19b: STRESSES that researchers' domain expertise is and continues to be crucial for efficiently using AI and assessing and contextualising AI-generated output and, as a result, must be upheld in the face of increased use of AI. DE (Comments): DE: This recital addresses the misunderstanding that "not using a new option" is an ethically safe choice whereas it can mean a heavy

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	responsibility because of lost beneficence. Both options need to be considered carefully with view to the pros and cons they imply. DE: Without domain knowledge, researchers cannot contextualise and check AI output. However, there exists a significant risk that future generations of researchers that have routinely used LLMs already during their training and studies, will develop less background knowledge and will increasingly opt for the perceived easy approach of unthinking AI use. This will have long-term negative effects also for science. Thus, this risk should be considered from the beginning and be mitigated by adequate measures.
20. URGES the Commission to provide quality **benchmarks** ~~standards~~ for AI in science **in close cooperation with the scientific community** and, monitoring **the effects of** ~~opportunities and risks for~~ AI uptake in R&I, counteract malicious uses and alert on inappropriate practices **and other misuses**, in close cooperation with Member States. STRESSES the need to develop and frequently update guidelines, benchmarks and best practice for the use of AI in science to ensure the integrity **and transparency**, **and enhance** reliability, **and** validity ~~and transparency~~ of R&I **outputs** ~~results~~. WELCOMES, in this light, the ERA Forum Stakeholders' document: 'Living Guidelines on the Responsible Use of Generative AI in research'.	NL (Drafting Suggestions): 20. URGES the Commission to provide quality **benchmarks** ~~standards~~ for AI in science **in close cooperation with the scientific community** and, monitoring **the effects of** ~~opportunities and risks for~~ AI uptake in R&I, counteract malicious uses and alert on inappropriate practices **and other misuses**, in close cooperation with Member States. STRESSES the need to develop and frequently update guidelines, benchmarks and best practice for the use of AI in science to ensure the integrity **and transparency**, **and enhance** reliability, **and** validity ~~and transparency~~ of R&I **outputs** ~~results~~**, while also promoting technical standardisation to enhance interoperability and reproducibility**. WELCOMES, in this light, the ERA Forum Stakeholders' document: 'Living Guidelines on the Responsible Use of Generative AI in research'. NL (Comments): This paragraph mentions ethical guidelines and quality standards but doesn't mention technical standardisation, which is crucial for interoperability, reproducibility and scalability of AI in science. BE

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Drafting Suggestions): 20. URGES the Commission to provide quality **benchmarks** ~~standards~~ for AI in science **in close cooperation with the scientific community** and, monitoring **the effects of** ~~opportunities and risks for~~ AI uptake in R&I, counteract malicious uses and alert on inappropriate practices **and other misuses**, in close cooperation with Member States and based on a human-centric approach rooted in the principles of digital humanism. CALLS on RFOs and RPOs to put in place adequate procedures and mechanisms to ensure the compliance of individuals to these benchmarks. STRESSES the need to develop and frequently update guidelines, benchmarks and best practice for the use of AI in science to ensure the integrity **and transparency**, **and enhance** reliability, **and** validity ~~and transparency~~ of R&I **outputs** ~~results~~. WELCOMES, in this light, the ERA Forum Stakeholders' document: 'Living Guidelines on the Responsible Use of Generative AI in research'. BE (Comments): - Support to AT proposal - In the end, it is on "the ground" that the actual practices will have to be taken up and implemented. AT (Drafting Suggestions): 20. URGES the Commission to provide quality **benchmarks** ~~standards~~ for AI in science **in close cooperation with the scientific community** and, monitoring **the effects of** ~~opportunities and risks for~~ AI uptake in R&I, counteract malicious uses and alert on inappropriate practices **and other misuses**, in close cooperation with Member States ~~-~~ and based on a human-centric approach rooted in the principles of digital humanism*.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	STRESSES the need to develop and ~~frequently~~ regularly update guidelines, benchmarks and best practice for the use of AI in science to ensure the integrity **and transparency**, **and enhance** reliability, **and** validity ~~and transparency~~ of R&I **outputs** ~~results~~. WELCOMES, in this light, the ERA Forum Stakeholders' document: 'Living Guidelines on the Responsible Use of Generative AI in research'. * Digital humanism offers a human-centric approach to navigating digitalisation and regulating frontier technologies, such as Artificial Intelligence, ensuring human agency when confronted with automated decision-making systems. Concrete principles are outlined in the Vienna Manifesto on Digital Humanism. AT (Comments): For AT mentioning digital humanism is important. Only referring to a "human-centric approach" could bear the risk of being too vague. Stating "Digital Humanism" would provide more concrete statements and justifications. Moreover, "Digital Humanism" focuses on digital technologies, which makes it more applicable in this context. And: It would also be coherent with the Council Conclusions that are under negotiations in the Education Committee (Draft Council conclusions on inclusive, learner-centred early childhood education and care and school practices, where digital humanism is mentioned in para 21). We are flexible regarding the footnote (and the reference to the Vienna Manifesto on Digital Humanism), as well on a possible change to para 3 instead of para 20 (as Germany suggested): 3. STRESSES the ~~unprecedented~~ **transformative** potential of responsible**, sustainable,** ~~and~~ ethical **and inclusive** use rooted in the principles of digital humanism of AI in science to stimulate groundbreaking knowledge and **drive** ~~accelerate~~ innovation deployment,

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	accelerate time to market, to strengthen R&I performance of the entire Union and boost its capacity to compete globally, thus leading to significant social and economic benefits and improved Member States' ability to grow, innovate, build strategic leadership in high-impact sectors, **reinforce economic security,** and tackle challenges ~~of various backgrounds~~.
Open and reliable ~~responsible~~ data to feed AI for science	
21. RECOGNISES the importance of high-quality, findable, accessible, interoperable, reusable (FAIR) and responsibly collected data for AI applications in science. **Thereby TAKES NOTE of the Lund Declaration on maximising the benefits of FAIR and open research data in Europe**. **HIGHLIGHTS the need to stimulate and reward researchers for making their curated data and models available according to ethical and FAIR principles, and also for** ~~STRESSES that the European Data Regulation framework should include targeted actions to~~ make**ing** data suitable for AI processing, fostering harmonised data sharing and interoperability.	MT (Drafting Suggestions): 21. RECOGNISES the importance of high-quality, findable, accessible, interoperable, reusable (FAIR) and responsibly collected data for AI applications in science. **Thereby TAKES NOTE of the Lund Declaration on maximising the benefits of FAIR and open research data in Europe**. **HIGHLIGHTS the need to stimulate and reward researchers for making their curated data and models available according to ethical and FAIR principles, and also for** ~~STRESSES that the European Data Regulation framework should include targeted actions to~~ make**ing** data suitable for AI processing, fostering harmonised data sharing and interoperability **and ensuring coherence with the EOSC's federated data-sharing model.** MT (Comments): Malta's suggestion to add a reference to the EOSC underlines our support for a European data strategy that is interlinked with existing open-science frameworks. LT (Drafting Suggestions): 21. ~~RECOGNISES the importance of high-quality, findable, accessible, interoperable, reusable (FAIR) and responsibly collected data~~

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	~~for AI applications in science.~~ **~~Thereby~~ TAKES NOTE of the Lund Declaration on maximising the benefits of FAIR and open research data in Europe. HIGHLIGHTS the need to stimulate and reward researchers for making their curated data and models available according to ethical and FAIR principles, and also for** ~~STRESSES that the European Data Regulation framework should include targeted actions to~~ make**ing** high quality data suitable for AI processing, fostering harmonised data sharing and interoperability. LT (Comments): FAIR concept is already explained in para 8. We suggest shortening this para. BE (Drafting Suggestions): 21. RECOGNISES the importance of high-quality, findable, accessible, interoperable, reusable (FAIR) and responsibly collected data for AI applications in science. **Thereby TAKES NOTE of the Lund Declaration on maximising the benefits of FAIR and open research data in Europe taking into account economic and research security. HIGHLIGHTS the need to stimulate and reward researchers for making their curated data and models available according to ethical and FAIR principles, and also for** ~~STRESSES that the European Data Regulation framework should include targeted actions to~~ make**ing** data suitable for AI processing, fostering harmonised data sharing and interoperability. BE (Comments): AI is considered to be a critical technology, so only stressing openness is not prudent.
22. INVITES Member States to contribute actively to **the implementation of** existing **common** European Data Spaces, such as the	MT (Drafting Suggestions):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
European Open Science Cloud (EOSC), **and** ~~to establish~~ new data spaces where necessary to support AI-driven research.	22. INVITES Member States to contribute actively to **the implementation of** existing **common** European Data Spaces, such as the European Open Science Cloud (EOSC), **and** ~~to establish~~ new data spaces where necessary to support AI-driven research**, whilst ensuring that any new AI-driven data spaces complement, rather than operate separately from, established EU data infrastructures.** MT (Comments): Malta wishes to underscore the importance of avoiding siloed data spaces, which is a key concern for smaller nations that benefit substantially from centralised EU resources. HU (Drafting Suggestions): 22. INVITES Member States to contribute actively to the implementation of existing common European Data Spaces, such as the European Open Science Cloud (EOSC), and new data spaces where necessary to support AI-driven research~~.~~ **and training of AI-models.** HU (Comments): For AI-driven research, data itself is necessary but not sufficient. We also need to train the AI with a wide variety of methods. FR (Drafting Suggestions): 22. INVITES Member States to contribute actively to **the implementation of** existing **common** European Data Spaces, such as the European Open Science Cloud (EOSC), **and** ~~to establish~~ new data spaces where necessary to support AI-driven research to take into account economic and research security. FR (Comments): Support to BE proposal. ES

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Drafting Suggestions): 22. INVITES Member States to contribute actively to **the implementation of** existing **common** European Data Spaces, such as the European Open Science Cloud (EOSC), the Data Protection Regulation or the European Health Data Space Regulation, **and** ~~to establish~~ new data spaces where necessary to support AI-driven research. ES (Comments): The regulations developed by the European Union in recent years constitute the legal basis and governance framework that should guide the development of a high-quality data ecosystem, with secure processing spaces and sand boxes, essential for the development and deployment of AI. BE (Drafting Suggestions): 22. INVITES Member States to contribute actively to **the implementation of** existing **common** European Data Spaces, such as the European Open Science Cloud (EOSC), **and** ~~to establish~~ new data spaces where necessary to support AI-driven research taking into account economic and research security. BE (Comments): AI is considered to be a critical technology, so only stressing openness is not prudent.
23. ENCOURAGES the adoption of open science practices in data collection, data sharing, and the **building of AI tools for science, including the** use of **open** models and algorithms, to increase the efficiency**, transparency, and reproducibility** of AI-powered science.	LT (Drafting Suggestions): ~~23. ENCOURAGES the adoption of open science practices in data collection, data sharing, and the **building of AI tools for science, including the** use of **open** models and algorithms, to increase the efficiency**, transparency, and reproducibility** of AI-powered science.~~ LT

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Comments): We do not see essential difference form para 21, therefore we would suggest deleting this para or merging it with para 21. We also would like to stress here the aspect of research security. Open models and algorithms should consider possible risks in that respect. ES (Drafting Suggestions): 23. ENCOURAGES the adoption of open science practices in data collection ~~,~~and data sharing in compliance with the current legal base addressing the use of data, and the **building of AI tools for science, including the** use of **open** models and algorithms, to increase the efficiency**, transparency, and reproducibility** of AI-powered science.
Fair access to AI solutions and interlinked infrastructure	
24. CALLS on the Commission and the Member States for increased efforts to better connect AI-enabling infrastructure and resources across ~~Europe~~ **the whole Union,**, support equitable access to high performance computing ~~and advanced software~~ for researchers and innovators, and foster **cross-border and, where appropriate, international** collaboration among researchers~~,~~ **and relevant stakeholders (e.g.** startups and scaleups, industry, social organisations and policymakers**)**.	FR (Drafting Suggestions): 24. CALLS on the Commission and the Member States for increased efforts to better connect AI-enabling~~-~~ infrastructure and resources across ~~Europe~~ **the whole Union,**~~-~~ support equitable access to high performance computing ~~and advanced software~~ for researchers and innovators, and foster **cross-border and, where appropriate, international** collaboration among researchers~~,~~ **and relevant stakeholders (e.g.** startups and scaleups, industry, social organisations and policymakers**)**. A specific attention should be paid to the environmental dimension of AI infrastructures. FR (Comments): Greater adoption of AI in science must not be at the expense of climate neutrality objectives. DK (Drafting Suggestions):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	CALLS on the Commission and the Member States for increased efforts to better connect AI-enabling infrastructure and resources across ~~Europe~~ **the whole Union,**, support equitable access to high performance computing ~~and~~ advanced software for researchers and innovators, and foster **cross-border and, where appropriate, international** collaboration among researchers~~,~~ **and relevant stakeholders (e.g.** startups and scaleups, industry, social organisations and policymakers**)**. DK (Comments): DK suggests to add advanced software again.
25. RECALLS the importance of developing dedicated AI technologies for application in science. TAKES NOTE of **EU and** Member States' efforts to enhance computing capacity and INVITES them to strengthen **stakeholders'** involvement**, notably from the private sector**, investment and collaboration to achieve further improvements.	IE (Comments): We support the addition of the reference to role of the private sector.
26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs~~), building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission to further enhance **and facilitate access by researchers to** computational capacity, **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs ~~and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~.	LT (Comments): Access by researchers or access for researchers? We find this para a bit unclear and would support rephrasing that would convene clearer message. IE (Comments): We welcome the explicit reference to the R&I community. It is important that R&I actors in both the public and private sector are included and reflected. FR (Drafting Suggestions): 26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive~~

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	~~Federation of~~ European High-Performance Computers (HPCs~~), building on existing initiatives such as EuroHPC~~ and AI Factories, through a long-term investment strategy~~, to support AI research and innovation~~. CALLS ON Member States and the Commission to further enhance **and facilitate access by researchers to** computational capacity, **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs ~~and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~. FR (Comments): In the absence of a long-term investment strategy, it will be very complicated to involve further R&I stakeholders. FI (Drafting Suggestions): 26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs~~), building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission to further enhance **and facilitate access by researchers to** computational capacity, **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs ~~and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency and environmental sustainability**~~consumption needs~~. FI (Comments): The AI-oriented supercomputers have a high energy consumption and can therefore have a large carbon footprint. Besides energy efficiency, environmental sustainability should be paid attention to. DK

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	(Drafting Suggestions): STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs)~~, building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission to further enhance **and facilitate access by researchers to** computational capacity, **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs and software for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~. DK (Comments): DK suggests to add advanced software again. DE (Drafting Suggestions): 26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs)~~, building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission ~~to further enhance **and facilitate access by researchers to** computational capacity,~~ **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs ~~and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~. DE (Comments): DE: The measures "facilitate access by researchers to computational capacity" and "facilitate fair access for researchers and innovators to HPCs for advancing research on AI" seem to heavily overlap. Therefore, we suggest to delete the first measure.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	BE (Drafting Suggestions): 26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs~~), building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission to further enhance **and facilitate access by researchers and innovators to** computational capacity, to train and use AI tools, **to improve** infrastructure interoperability, and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to HPCs ~~and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~. AT (Drafting Suggestions): 26. STRESSES the need for **better involvement of the R&I community with the ecosystem built around** ~~a more comprehensive Federation of~~ European High-Performance Computers (HPCs~~), building on existing initiatives such as EuroHPC~~ and AI Factories~~, to support AI research and innovation~~. CALLS ON Member States and the Commission ~~to further enhance **and facilitate access by researchers to** computational capacity,~~ **to improve** infrastructure interoperability and to further enhance~~,~~ and facilitate **fair** ~~undisturbed~~ access for researchers and innovators to computational capacity ~~HPCs and software~~ for advancing research on AI and for its uptake in science, while considering energy **efficiency** ~~consumption needs~~. SE (Comments): SE really likes this paragraph. It is central that both supercomputers, AI-factories and experimental platforms are made open to actors from all member states, regardless of their location, so that national actors can

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	choose foreign infrastructure of their choice, if another system is more suitable.
27. NOTES the potential of EU companies, SMEs ~~and~~, startups **and scaleups** in supporting researchers **and innovators** to develop, and benefit from trustworthy AI-based technologies for R&I, and CALLS ON the Commission and Member States to stimulate and support work on systems, applications or tools for the targeted use of AI in R&I, **considering IPR and copyright**.	
28. CALLS for leveraging public procurement and R&I funding, to foster the adoption of AI technologies in, **for example, higher education institutions** ~~universities~~, research organisations, technology transfer offices and accelerators, promoting the integration of AI into scientific processes, university spin-offs, innovative startups and scaleups.	FR (Drafting Suggestions): ~~28. CALLS for leveraging public procurement and R&I funding, to foster the adoption of AI technologies in, **for example, higher education institutions** universities, research organisations, technology transfer offices and accelerators, promoting the integration of AI into scientific processes, university spin-offs, innovative startups and scaleups.~~ FR (Comments): The link between the use of public procurement and AI adoption does not seem appropriate to us. The use of public procurement obviously contributes to the scaling-up of startups, but its consequences for the adoption of AI in science seem less direct. AT (Drafting Suggestions): 28. CALLS for leveraging public procurement and R&I funding, to foster the adoption of AI technologies in, **for example, higher education institutions** ~~universities~~, research performing and funding organisations, technology transfer offices and accelerators, promoting the integration of AI into scientific processes, university spin-offs, innovative startups and scaleups.

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	SE (Drafting Suggestions): 29. ACKNOWLEDGES the increasing use of AI in academic publishing and how it reshapes how research is produced, reviewed and shared. HIGHLIGHTS the need for policies and guidance on transparency, copyright and researchers' rights to research publications and data. STRESSES the importance of transparency in AI-generated content and editorial processes for maintaining research integrity and trust. Balanced copyright frameworks and rights retention policies can support innovation and equitable access to scientific knowledge. SE (Comments): Sweden strongly suggests that a paragraph on AI in academic publishing is added to the draft conclusions. The increasing use of AI in academic publishing is reshaping how research is produced, reviewed and shared. This highlights the need for policies and guidance on transparency, copyright, and researchers' rights to research publications and data. Transparency in AI-generated content and editorial processes is important for maintaining research integrity and trust. Balanced copyright frameworks and rights retention policies can support both innovation and equitable access to scientific knowledge. Policies promoting open science, responsible AI use, and fair copyright practices will help sustain an innovative and equitable academic publishing landscape, and address new challenges emerging by the sweeping development of AI and its use in scientific publishing.
	MS general comments
	LT (Comments): We thank the Presidency for considering many of our comments. However, we still feel that the aspect of research security should be enhanced in the text. We would support any changes that would take into

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	account the direction set by the Council Recommendation on enhancing research security. IE (Comments): We welcome the revised Conclusions and the efforts to clarify the key messages and strengthen the text. We recognise that the focus of the CCs is on AI in science. But there needs to be a greater focus on how we use AI for social progress but more importantly to drive competitiveness. In spite of the very significant focus in recent months on the Draghi and Letta reports and the urgent need to exploit and commercialise Europe's excellent research, there is little focus in these Conclusions on how AI research should be used. There remains scope to be clearer on the purpose of the CCs, which we believe should be as a platform for MS to set out our priorities to inform the preparation of the Commission strategy. DK (Comments): DK supports other MSs who call for a clearer reference to the AI Summit in Paris in view of the prominence of AI research and innovation. DK supports those MS calling for an addition to the text regarding energy efficiency and environmental sustainability as proposed at RWP February 27th. DK would welcome suggestions on paras, which highlights the potential of commercialisation of AI research – mainly to illustrate the huge potential of AI research in view of the European industries and societies. SI (Comments):

Presidency text (doc. 6418-25)	Drafting Suggestions and Comments
	In para 15, what is meant by networks and exchange programmes for graduate and doctoral students? It is Erasmus and MSCA or other instruments beyond those? If so, consider making it more explicit.
	End