

Warszawa, 22 listopada 2023 r.
KL/434/201/ET/2023

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W związku z opublikowaniem przez Komisję Europejską Zaleceń w sprawie obszarów technologii krytycznych dla bezpieczeństwa gospodarczego UE (*Recommendation on Critical Technology Areas for the EU's Economic Security*), Związek Pracodawców Technologii Cyfrowych Lewiatan przesyła uwagi do niniejszego tekstu.

Z poważaniem



Jolanta Jaworska
Prezes
Związek Pracodawców Technologii Cyfrowych Lewiatan

Załącznik: Uwagi Związku Pracodawców Technologii Cyfrowych Lewiatan dotyczące Zaleceń w sprawie obszarów technologii krytycznych dla bezpieczeństwa gospodarczego UE (*Recommendation on Critical Technology Areas for the EU's Economic Security*).

**Remarks of Association of Employers of Digital Technologies Lewiatan on
Recommendation on Critical Technology Areas for the EU's Economic Security**

1. Imposing restrictive export controls and limiting foreign direct investment related to critical technologies could have a very detrimental impact on innovation and deployment of technology, investments by US companies in Europe, as well as EU-US cooperation in research.
2. Limiting EU-US cooperation through restrictive measures could have an adverse effect on security. Through joint research and development efforts and exchange of information, governments and companies in the EU and the US are better equipped to lead and protect themselves against security risks.
3. New restrictions would damage the multiple venues where the US and the EU cooperate on emerging technologies and jointly address and mitigate risks – such as the US-EU Trade and Technology Council and the Wassenaar Arrangement.
4. Instead, the EU should focus on strengthening cooperation frameworks towards developing common mitigation measures against security risks with trusted partners like the US.
5. Efficient risk mitigation requires evidence-based assessment of risks and through impact assessments of the potential impact of new measures on economic activity. Importantly, the EU should take the time to consult with governments and industry instead of imposing unrealistic deadlines to answer lengthy questionnaires.

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