EARE's answer to the European Commission's roadmap on Open data – availability of public datasets

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The European Alliance for Research Excellence, a coalition of companies and research organisations formed in 2017 committed to the future of innovation and R&D in Europe, warmly welcomes the opportunity to provide feedback on the European Commission's roadmap on Open Data – availability of public datasets.

Since 2017, we have been advocating for copyright rules in Europe that enable a fair and effective use of Text and Data Mining (TDM) through a broad, easy-to-understand TDM exception with the objective to generate opportunities from the power of data. TDM is a building block for both machine and deep learning: without the ability of computers to analyse very large amounts of data and employ cognitive technologies to allow the learning of patterns, Artificial Intelligence (AI) would not be possible. AI has been instrumental in the fight against COVID-19 and its development needs to be encouraged to unlock many new business opportunities for innovators in Europe.

Without a comprehensive data strategy, Europe is at risk of falling behind other geographies that have adopted TDM- and AI-friendly laws, such as the US, Japan, Singapore and even China. Yet, with the right incentives in place, Europe can create an enabling ecosystem and ensure its citizens can benefit from the data economy. Guaranteeing everyone can access publicly-held data through the identification of high-value datasets is a first step in the right direction to attract the most promising startups, companies and researchers in Europe.

In addition, there is a broad recognition from regulators and industry that making data more open and accessible is critically important to foster collaboration and help drive European research and competitiveness in AI. Opening up access to data for better research outcomes is achievable, and preferable to data being withheld by a few public or private organizations. It is achievable, inter alia, through the wide adoption of open data policies.

As a coalition, we fully support the principle that data should be "*as open as possible, as closed as necessary*". As such, we fully support the Commission's ambitions outlined in the Open Data Directive to identify so-called "*high-value datasets*" held by the public sector, which should be re-usable for free, using application programming interfaces, available in machine-readable format. We wish to underline the importance of these datasets being made available under these conditions to all actors of the data economy, be they from the public or the private sector.

Finally, we wish to reiterate that while we support the idea of identifying "*high-value datasets*", we believe that value for society and the economy does not come from the data itself, but from the outcomes and insights that can be derived from that data. As such, the more data is being made available, the more meaningful and valuable outcomes can be generated.

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