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Communications and Digital Committee
House of Lords
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RE: Large Language Models Inquiry

1. Kairoi Ltd (“we” hereafter) warmly welcomes the government’s continued efforts to engage with the public, and the invitation to inform the Communications and Digital Committee’s inquiry into what needs to happen over the next 1–3 years to ensure the UK can respond to the opportunities and risks posed by large language models (LLMs). At Kairoi, we consult on AI ethics and research governance, and engaging with public policy on technological matters constitutes one of our four pillars of responsible artificial intelligence (AI), alongside delivering informative communications, identifying relevant technical standards, and involving the public.
2. The present submission follows the structure of the three headlines posed in the call for evidence, wherein we hold the following theses:
 - a) **Capabilities and trends:** by seeing to palpable risks posed by LLMs, the UK can lead systemic changes that harness the full potential of AI research and development;
 - b) **Domestic regulation:** Government must involve more diverse parties in the increasingly urgent creation of LLM-related regulation; and
 - c) **International context:** the UK should harness its international standing by leading collaborative efforts for regulating AI across nations.
- a) **Capabilities and trends**
3. There are ongoing risks posed by LLMs that may increasingly jeopardise the stability of modern institutions. Risks include increased inequality, scalable disinformation campaigns, and declining protection of intellectual property (IP) and other rights.
4. The design, development and deployment of LLMs increases inequalities by accelerating wealth-concentration, both at macro¹ and microeconomic² levels.

¹ Alonso, C. et al. (2023) How Artificial Intelligence Could Widen the Gap Between Rich and Poor Nations, *IMF Blog*, [online](#) [accessed 04 September 2023]

² Chiang, T. (2023) Will A.I. become the new McKinsey? *The New Yorker*, [online](#) [accessed 04 September 2023]

5. A defining capability of LLM-based systems – including generative artificial intelligence (AI) tools such as ChatGPT – is the speed at which convincing content can be created. This constitutes a recipe for larger-scale and more targeted disinformation campaigns.³
6. LLMs are commonly trained on vast amounts of data scraped from the internet, potentially without regard to the scraped contents' copyright or IP provisions. As LLMs constitute the backbone of numerous generative AI tools, there is concern that their outputs dismiss or even infringe upon the IP rights of the creators of the content the LLM was trained and tested on. This issue is further explored in paragraphs 17 and 18.
7. Environmental rights are also threatened by the indiscriminate development of LLMs. Training, maintaining and operating LLMs requires vast amounts of energy and the carbon footprint of LLMs is likely to grow in the near future.⁴
8. In responding to these issues, the UK has the opportunity to harness the full potential of LLMs. The response must involve tackling both the demand and supply of LLMs through the advancement of AI literacy, and the promotion of more targeted LLM development efforts, respectively.
9. AI literacy involves empowering the general population with the education, awareness and critical thinking skills necessary to thoughtfully embrace and evaluate novel technologies.⁵ A better-informed public can guide demand towards more useful and technically viable LLM-based products and services, and away from hyped up tools. However, it is crucial that the UK inform the public through independently curated content, whether by research institutes such as the Ada Lovelace Institute; or by civil society organisations, such as the RSA (the Royal Society of Arts, Manufactures and Commerce).
10. Greater collaboration among actors across the UK's AI ecosystem can enable better incentive structures that steer LLM-development away from simple profit-seeking and towards more impactful innovations, solving well-articulated problems as informed by multidisciplinary teams. One of our recommendations captured in the report *Looking Before We Leap*⁶ is that AI research funders allocate resources specifically for evaluating social and ethical questions their projects raise. Furthermore, feasibility studies should inform whether LLMs are the best tool for the articulated problem.
11. Underlying the previous two paragraphs is the view that how LLMs will develop over the next 1-to-3 years is up to us. Both the risks and opportunities are systematic in nature, and we have the tools to lead the educational, environmental and economic change that can help seize the opportunities whilst mitigating against risks. These tools must be varied, and not limited to technical solutions as commonly proposed by standard development organisations.

³ Benson, T. (2023) This Disinformation Is Just for You, *Wired*, [online](#) [accessed 04 September 2023]

⁴ Wong, M. (2023) The Internet's Next Great Power Suck, *The Atlantic*, [online](#) [accessed 04 September 2023]

⁵ Kairoi Ltd (2023) RE: Consultation on policy proposals for UK's pro-innovation approach to AI Regulation, *Kairoi Resources*, [online](#) [accessed 04 September 2023]

⁶ Peterman, M. et al. (2022) *Looking Before We Leap: Expanding ethical review processes for AI and data science research*, *Ada Lovelace Institute*, [online](#) [accessed 04 September 2023]

b) Domestic regulation

12. We informed the Office for Artificial Intelligence on our views on domestic regulation of AI in June, but will here make mention of two developments since then: details about the AI Safety Summit⁷ and the MPs' recent call to abandon an AI copyright exemption.⁸ Both events reflect the government's consistency in delivering U-turns where greater legislative certainty is what the UK needs.
13. The first U-turn is that of the AI Safety Summit announced in June,⁹ a summit which showcases the UK's capacity to lead on AI governance. Whilst we are keen to see the UK play a prominent role in enabling robust AI governance policies and practices, the circumstances surrounding the AI Safety Summit are suspect.
14. On the one hand, the summit contrasts strongly with the pro-innovation approach to AI regulation that the government had previously proposed, which made light of the need for regulation. Given this previous stance, the summit seems to tag onto previous serious efforts conducted in this space – led by the OECD, GPAI, the UN and others – and assumes credit for the UK on governance concerning “frontier AI”, a conceptually imprecise term¹⁰ that exacerbates the concerns described in the previous section.
15. On the other hand, the summit was announced shortly after the Prime Minister's meetings with CEOs of AI companies¹¹ that have historically peddled narratives about “existential risk”.¹² Their influence is most notable in No. 10's acknowledgement of such risks.¹³ The concern here relates with who is guiding domestic regulation about AI, and how talk of unlikely future events commonly reserved for fictional narratives may distract from more palpable issues, be they educational, economic, environmental or other. The very framing of the summit is questionable, as “AI safety” is markedly distinct from “AI ethics”.¹⁴
16. As a sidenote, it is worth celebrating the Communications and Digital Committee's choice of words when asking about *LLMs*, as opposed to *AI writ large*, “artificial general intelligence” or, indeed, “frontier AI”.

⁷ Department for Science, Innovation and Technology et al. (2023) UK government sets out AI Safety Summit ambitions, [online](#) [accessed 04 September 2023]

⁸ Culture, Media and Sports Committee (2023) Abandon artificial intelligence copyright exemption to protect UK creative industries, MPs say, [online](#) [accessed 02 September 2023]

⁹ Prime Minister's Office, 10 Downing Street and The Rt Hon Rishi Sunak MP (2023) UK to host first global summit on Artificial Intelligence, [online](#) [accessed 04 September 2023]

¹⁰ Elliot, J. (2023) Explainer: What is a foundation model? *Ada Lovelace Institute*, [online](#) [accessed 04 September 2023]

¹¹ Parker, G. & Criddle, C. (2023) Rishi Sunak touts leading role for Britain in AI regulation, *Financial Times*, [online](#) [accessed 04 September 2023]

¹² Center for AI Safety (2023) Statement on AI Risk, [online](#) [accessed 04 September 2023]

¹³ Hern, A. & Stacey, K. (2023) No 10 acknowledges ‘existential’ risk of AI for first time, *The Guardian*, [online](#) [accessed 02 September 2023]

¹⁴ Bender, E.M. (2023) Talking about a ‘schism’ is ahistorical, *Medium*, [online](#) [accessed 04 September 2023]

17. Kairoi has reported on another series of policy U-turns: those regarding “text and data mining” (TDM).¹⁵ In short, the debacle began in June 2022 with the suggestion that there be a copyright and database exception allowing TDM for any use. In February 2023, this line of work was abandoned. However, the pro-innovation whitepaper seemed to supersede this.
18. We welcome the call by MPs to abandon the proposed exemption made this August¹⁶ but remain concerned that domestic regulation initiatives relating to AI are fickle at best and non-existent at worst.
19. Once again, we see collaboration as being key to enabling adequate and steadfast efforts. This means collaborating across industries and with diverse social groups, reducing the influence of big tech companies. LLMs have a wide range of potential applications, so their regulation is not a question only about technical expertise but also about social impacts and lived experiences.

c) International context

20. Collaboration is also required at an international level. Consider the mention of the TDM debacle above, and the Information Commissioner’s Office signing of the international *Joint statement on data scraping and the protection of privacy*.¹⁷ Whilst the statement may be criticised for over-emphasising individuals’ obligations to protect their own privacy online, it is an example of the UK cooperating with other countries on what is ultimately an extremely complex issue.
21. The EU and China have been leading in AI regulation for some time, and the UK is only now running an “AI Safety Summit” informed by industry. The UK must embrace its standing in forums such as the UN, OECD and G7 to urge states for international cooperation and challenge common silos between jurisdictions.
22. International collaborations concerning the regulation and standardisation of AI practices have emerged over the years, from the OECD AI Policy Observatory in 2019¹⁸ and the Global Partnership on AI in 2020,¹⁹ to the more recent “Administrative Arrangement on AI for the Public Good” between the EU and the US.²⁰ Whilst the focus of the AI Safety Summit on “frontier AI” is suspect, it is good to see that international regulatory efforts have been referenced, and the summit may well have the potential to serve as a catalyst for international collaborations.

¹⁵ Kherroubi Garcia, I. (2023) Generative AI and Intellectual Property (IP) regulation in the UK: walking a difficult tightrope, *Kairoi*, [online](#) [accessed 02 September 2023]

¹⁶ Culture, Media and Sport Committee (2023) Abandon artificial intelligence copyright exemption to protect UK creative industries, MPs say, [online](#) [accessed 04 September 2023]

¹⁷ Office of the Privacy Commissioner of Canada (2023) Joint statement on data scraping and the protection of privacy, [online](#) [accessed 04 September 2023]


¹⁸ OECD.AI (n.d.) About OECD.AI, [online](#) [accessed 02 September 2023]

¹⁹ The Global Partnership on AI (n.d.) About GPAI, [online](#) [accessed 02 September 2023]

²⁰ European Commission (2023) The European Union and the United States of America strengthen cooperation on research in Artificial Intelligence and computing for the Public Good, [online](#) [accessed 02 September 2023]

23. It remains to be seen where the UK's national approach to AI regulation will land, but we can already see a spectrum of approaches emerging, from China²¹ and the EU's rigorous stance, to more flexible approaches followed by the US.²²
24. Whilst political allegiances may guide how the UK ends up regulating LLMs, we suggest that competing to *lead* in the world of AI governance is much less fruitful than facilitating *collaboration* in this space.

Sincerely,



Ismael Kherroubi Garcia, FRSA
Founder & CEO, Kairoi

²¹ Zheng, S. & Zhang, J. (2023) China Wants to Regulate Its Artificial Intelligence Sector Without Crushing It, *Time*, [online](#) [accessed 04 September 2023]

²² Potkin, F. et al. (2023) Exclusive: EU's AI lobbying blitz gets lukewarm response in Asia, *Reuters*, [online](#) [accessed 04 September 2023]