

---

## ***EuroGeographics feedback on EU Artificial Intelligence Act proposal***

---

*Ref no.2021-00037.LT*

*TR 51080067776-74*

*Brussels, 2021*

### **Key points:**

- Legal certainty, risk assessment levels, regulated use, and concept of trust by increasing the trust for EU made AI products are the main benefits of the proposal from Eurogeographics members' point of view.
- The coherence of this Regulation proposal with the Commission's overall digital and data strategy is very much appreciated.
- EuroGeographics members' authoritative data, high quality datasets, are back bones to many of the critical infrastructures as defined in the proposed Regulation.
- This Regulation represents a good start for regulated development and deployment of AI systems within geo spatial community.
- We understand that the Commission intends to revise the Liability legal framework by taking into account innovative technologies including AI, and we will be reviewing these with a specific interest.

EuroGeographics is an independent international not-for-profit organisation representing Europe's National Mapping, Cadastral and Land Registration Authorities (NMCAs). We are a passionate advocate for European geospatial data from official trusted sources, in particular when it is harmonised to standard specifications. We are providers of a range of products and services and expertise which supports navigation, automated vehicles management, emergency response, a reliable and secure land and property market, fiscal and many more government and business decisions and services.

NMCAs developments of AI systems is still very much at proof-of-concept stage. However, our sector has proved its ability to embrace new technologies and we reckon that what is new now will certainly go mainstream soon.

At this stage, EuroGeographics members are both, AI users and providers of data that are very widely feeding AI services and business. AI is used for processing geospatial information, in particular for increasing the efficiency of their quality assurance and management – the calling card of NMCA data. For example, some of our members have been combining high-resolution elevation analysis with deep learning techniques, to provide policy-makers with vital information for the transition to solar energy, exploring how to use AI for a wide range of activities including land cover mapping and the creation of 3D data is high on the agenda.

Furthermore, our members have fully embraced the European strategy for data, and they already contribute substantially to make it a success story. The crucial contribution is primarily by implementing the Open data and PSI directive, which will establish trusted mechanisms and services for the re-use, sharing and pooling of data that are essential for the development of data-driven AI models of high quality.

The Regulation proposal confirms that some areas of AI deployment will fall under existing legislation and will be fully coherent with the Commission's overall digital strategy. This is a strong stir for our members, since the stable governance principles and data protection established thereof, encourages our members to create and test high-risk AI systems, for example in the transport field. This possibility will provide many opportunities for NMCAs to contribute to the digital single market. The development of programmes, research, projects, or support, that will allow the growing of the diffusion of AI within our member organizations, will be highly welcomed.

We are aware that this Regulation applies to providers placing on the market or putting into service AI systems and we are not there yet. Nevertheless, our members' authoritative data, high quality datasets, are back bones to many of the critical infrastructures as defined in the proposed Regulation. In recent years, we have seen an explosion in location-based AI systems. Some of our members are already in the testing phase of geospatial data-based AI applications, and this regulatory framework is the supportive direction for that, which is considered a good start.

The Regulation proposal has positively raised awareness of AI and is intended to balance very sensitive issues such as fundamental rights, public safety, and innovation. It is highly desirable to have definitions in a flexible manner, not to hamper innovations.

Legal certainty, risk assessment levels, regulated use, and concept of trust by increasing the trust for EU made AI products are the main benefits of the proposal from Eurogeographics members' point of view.

We express our interest in further development of this legal debate. If you need any further clarifications, please do not hesitate to contact: [lea.bodossian@eurogeographics.org](mailto:lea.bodossian@eurogeographics.org)

**Léa Bodossian**

Secretary General & Executive Director

w. [www.eurogeographics.org](http://www.eurogeographics.org)

e. [lea.bodossian@eurogeographics.org](mailto:lea.bodossian@eurogeographics.org)

m. + 32 485 68 79 05

EuroGeographics Head Office  
Rue du Nord 76/Noordstraat 76  
1000 Brussels, BELGIUM