

Region Västra Götaland

2021-07-05

Region Västra Götaland's position paper on EU's Artificial Intelligence Act

Key messages:

- Welcomes that the regulation is based on citizens' fundamental rights. The development and use of AI must be guided by democratic and ethical principles.
- Welcomes that the regulation uses a risk-based approach to create a structured division between different types of AI systems.
- Welcomes that the regulation highlights the importance of test and development opportunities, in controlled forms, to achieve increased application and development. The importance of test environments and regulatory sandboxes for testing new solutions in a safe environment is crucial for the development of AI.
- Highlights the importance of ensuring that public actors, such as regions and municipalities, have the tools to make an adequate risk assessment of often complex AI value chains.
- Welcomes the Coordinated Plan on Artificial Intelligence 2021 Review as an important part in the work to create a European approach to Artificial Intelligence.

Artificial intelligence (AI) has the potential to contribute significantly in several areas such as increased economic growth as well as solutions to environmental and social challenges. Already today, there are examples of AI enabling better diagnoses of diseases, reducing energy use, reducing traffic accidents, creating new services, streamlining industrial production, developing new drugs, and shortening red tape. At the same time, the risks of AI need to be considered. It is therefore positive that the proposal uses a risk-based approach to create a structured division between different types of AI systems and its use. As in the reply to the Public Consultation on the White Paper on AI, Region Västra Götaland highlights that the development and the use of AI need to be guided by norms and ethical principles and be based on the principle of human rights. The overall goal should be sustainable AI, meaning that AI applications should be ethical, secure, reliable, and transparent. Ethical and safety considerations cannot be an afterthought in AI applications but must be an integral part of the early design work.

The use of AI has the potential to create significant benefits in several areas through increased economic growth as well as solutions to environmental and societal challenges. It is therefore important that there is a balance between the consideration of risk on the one hand and development

and innovation on the other. Thus, it is central that the proposal highlights the use of so-called regulatory sandboxes. It is an important part in promoting innovation and streamline regulatory compliance for future AI systems. Test and experimental environments, as well as regulatory sandboxes, are central to the development of reliable AI.

For AI to contribute with desired effects, data needs to be made available. It is with the help of large amounts of data that AI can be used, for example, in healthcare diagnoses and contribute to preventive health. A prerequisite is the possibility to share and use data in a secured manner. Furthermore, data needs to be of high quality.

In the proposal, parts of the activities under regional responsibility falls under areas of possible high-risk AI applications. It is therefore important that the right conditions are created to ensure that the public administrations have the right tools to make an adequate risk assessment of often complex AI value chains. It is of great importance that the consequences of the proposal for both public and private activities are analysed in detail. The possible increased administrative burden for regions and municipalities also needs to be analysed.

Furthermore, digital skills and competences are key factors. A prerequisite for sustainable introduction and application of trusted AI systems is the understanding and commitment to AI development. The need for digital skills is growing but there is simultaneously a shortage of digital skills and excellence in many parts of the EU, for example in Sweden. This is a challenge, not least for the development of AI. The proposal for a new AI regulation can be expected to further increase the need for digital competence in various businesses and industries. Resources need to be invested in skills development in both public and private sectors. Investments in lifelong learning, efforts to attract international talent and improved measures to match the supply and demand in the labour market are needed in the EU. Region Västra Götaland therefore welcomes the European Commission's new coordinated plan on AI. It is important to work strategically on measures for skills supply, digital skills and increased investment, and to make use of the already existing structures at local, regional, national and European level. Regions have long experience of supporting and collaborating with actors in different ecosystems and infrastructures at regional level. These already existing forms of cooperation and ecosystems should be considered in the future work in the field of digitalisation and AI.

Region Västra Götaland

Region Västra Götaland, governed by democratically elected politicians, has around 50 000 employees and is in addition to regional development also responsible for providing health care and public transport for all inhabitants in Västra Götaland. Västra Götaland is home to 1.7 million inhabitants. As a large procuring organisation and employer, Region Västra Götaland has the ambition to act as a forerunner within sustainable development and as test bed for new ideas and innovations. Together with the 49 municipalities, trade and industry, organisations and academia, we drive development with Västra Götaland's best interests as objective.