



Comments on the White Paper on Artificial Intelligence¹

Presented by CEPIS in an open public consultation

The Council of European Professional Informatics Societies (CEPIS) welcomes the digital package published by the European Commission on 19 February 2020. In the frame of an open public consultation CEPIS presents the following comments:

1. CEPIS supports the adoption of the European Commission's White Paper on Artificial Intelligence (AI) which we treat as one of the most important tools in digital transformation of Europe and in close connection to the European Strategy on Data. Many Member States have adopted special strategies on AI, including France, Germany, Finland and others. The role of Europe in this area is irreplaceable. We agree with the two building blocks of the White Paper: ecosystem of excellence and ecosystem of trust.

Ecosystem of excellence

2. Regarding the Member States and their specific AI strategies, CEPIS supports the European revision of the Coordinated Plan of the EU and Member States in AI to be adopted until the end of 2020 as well as the ambition to boost investment in AI in Europe beyond the possibilities of any single Member State and to use AI to tackle the most pressing problems in the green transformation of Europe.

3. Besides the European lighthouse centre of research, innovation and expertise CEPIS considers it very important to support also the centres of excellence and testing in areas where Europe can become world leader, thus reflecting the possibility to pool the regional potential, knowledge and expertise.

4. CEPIS is aware that, despite all efforts and financial support, the level of digital skills is increasing very slowly. Therefore, we support the update of the Skills Agenda for Europe and the Digital Education Action Plan in 2020 in order to bring the measures for real improvement on the level of digital skills² in general, and in AI skills in particular, together with the social partners. This will need to develop the AI professional and ethical standards mainly on MSc level, against which graduates can evidence that they have obtained the appropriate level of skills to work with AI products and services. The skills improvement will enable ICT professionals to work more effectively with ICT and special AI technologies and prepare citizens to be aware of the decisions which will be more and more influenced by AI.

5. CEPIS supports the ambition of the White Paper to broaden the adoption of AI in private and public sectors. AI can boost innovation, especially in SMEs, and by stronger public-private partnership. In public sector it should be used more widely with special focus on healthcare and transportation together with smart city solutions. Nonetheless, particularly in the public sector, AI usage must be subject to strict regulation, testing and editing procedures in order to avoid discrimination and undesirable environmental effects.

¹ On Artificial Intelligence - A European approach to excellence and trust, COM(2020) 65 final, 19.2.2020

² The European Union must act immediately to improve the level of digital skills, CEPIS position paper, 2020

Ecosystem of trust

6. CEPIS respects the non-binding Guidelines of the High-level Expert Group on ethical principles of AI based on the values of privacy, reliability and transparency, which need to be implemented in practice. At the same time, CEPIS supports the adoption of a clear European regulatory framework which will bring trust among consumers and businesses in AI and compliance with European principles and values. A European regulatory framework will protect European citizens and create a more efficient internal market for further development and uptake of AI.

7. The legislative framework should address the risks of AI deployment, especially the changes in the concept of safety and liability, the changing functionality of AI applications during their lifecycle and clear responsibility of different economic operators in the supply chain.

8. CEPIS supports the scope of future AI European legislation as proposed in the White Paper together with the requirements on the high-risk AI applications. The legislation should be binding for all AI products regardless of whether they were produced in the EU. It should be enforced within the frame of conformity assessment mechanisms that already exist for the large number of products circulating in the EU internal market, with special provisions for AI products.

9. CEPIS strongly supports the aim of the European Commission to regulate limitations of the usage of AI technologies in the public sphere regarding fundamental rights, particularly the use of facial recognition technology for remote biometric identification in public spaces.

10. CEPIS supports the creation of a governance structure in the form of a framework for cooperation of the responsible national authorities which should play a key role in the implementation of AI legislation by issuing guidance and opinions, exchanging information and best practice, and advising on improvement of standardisation, testing and certification.

11. Alongside thousands of experts³, CEPIS is convinced that the EU should ban lethal autonomous weapons based on AI technologies. CEPIS believes that such technology poses great risk for civil liberties and peace and supports the drafted idea of those bans.

12. CEPIS agrees that AI is a strategic technology that offers many benefits for citizens, companies and society as a whole, provided it is human-centric, ethical and sustainable and respects fundamental rights and values. CEPIS is ready to cooperate with the European Commission in the work outlined in the White Paper and provide the feedback of IT professionals from CEPIS Member States all over Europe.

[The Council of European Professional Informatics Societies](#) (CEPIS) was established 30 years ago to represent European informatics professionals and to act as their voice. Our ambition is that informatics professionals' voice be heard and paid regard to. Being an institution of civil society, we care about the social impact of information technology and feel obliged to raise our voice when an issue is close to the content of our concern.

³ <https://futureoflife.org/open-letter-autonomous-weapons/>