

Consultation on the “White Paper on Artificial Intelligence - A European approach to excellence and trust”

Introduction

The European Commission’s White Paper on Artificial Intelligence was published on 19 February 2020.

In the forewords, the White Paper states that the “Commission is committed to enabling scientific breakthrough, to preserving the EU’s technological leadership and to ensuring that new technologies are at the service of all Europeans – improving their lives while respecting their rights.” (WP p.1)

The White Paper puts forward the Commission’s view on how to achieve these aims. All stakeholders, including civil society organisations, were invited to react to the ideas presented.

The Civil Liberties Union for Europe hereby submits its comments to the Commission’s proposals in the hope of contributing to its decision-making in the discussed realm.

The Civil Liberties Union for Europe

The Civil Liberties Union for Europe (henceforth Liberties) is a non-governmental organisation promoting the civil liberties of everyone in the European Union. Liberties is built on a network of national civil liberties NGOs from across the EU.

Liberties, and its members, want the peoples of the EU and its member countries to live in societies where their civil liberties are protected, where they can participate freely in the democratic process and where their governments respect the rule of law.

Liberties is headquartered in Berlin and has a presence in Brussels. Currently, it has member organisations in Belgium, Bulgaria, the Czech Republic, Croatia, Estonia, France, Hungary, Ireland, Italy, Lithuania, Poland, Romania, Spain, Slovenia, the Netherlands and associated partners in Germany

and Sweden. Liberties intends to keep expanding its membership to include NGOs from all EU countries.

General comments on the approach taken by the White Paper

In the White Paper, the European Commission takes a predominantly economic and technosolutionist approach to the use of artificial intelligence.

The White Paper sets the goal of Europe becoming “a global leader in innovation in the data economy and its applications” amid fierce global competition. While the White Paper talks about the advantages of the EU’s strong attachment to values and the rule of law, it degrades this very attachment to an instrumental role – it may make European AI products and services more marketable globally and may give European firms a competitive advantage. Liberties believes this to be a dangerous approach. European values and the rule of law are not valuable because European products sell better. It is a very fortunate coincidence if they do. However, European values and the rule of law are to be respected and promoted even when they constrain economic interests.

The White Paper repeatedly emphasizes the improvements artificial intelligence can bring to our lives in ways “that we can only begin to imagine” and is clearly committed to significantly broadening its uptake both in the public and in the private sectors. Liberties believes that this unquestioned commitment is mistaken. AI can solve certain societal problems, but it can also exacerbate others. In a democratic society people should have a say whether, and if so, where and how, AI can be used. This is particularly true where AI-based technologies affect their fundamental rights and freedoms and/or their access to public services.

Liberties believes that instead of the above-described predominantly economic and technosolutionist approach, the Commission ought to adopt a human rights-based and democratic approach. Human rights ought to constrain the development and deployment of new technologies. Democratic oversight over the use of new technologies needs to be promoted.

The Commission must make sure that we are not surrounded by AI that only looks trustworthy. The AI we live with must be genuinely worthy of our trust.

Website:

liberties.eu

Contact info:

info@liberties.eu

The Civil Liberties Union for Europe e. V.

Prinzenstr. 103.

10969 Berlin

Germany