

# Consultation on the White Paper on Artificial Intelligence – A European Approach

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A Eurelectric response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

## We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

**investing** in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

**transforming** the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

**accelerating** the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

**embedding** sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

**innovating** to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2020/12.105/36

WG Innovation & Digital

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# Consultation on the White Paper on Artificial Intelligence - A European Approach

Fields marked with \* are mandatory.

## Introduction

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Artificial intelligence (AI) is a strategic technology that offers many benefits for citizens and the economy. It will change our lives by improving healthcare (e.g. making diagnosis more precise, enabling better prevention of diseases), increasing the efficiency of farming, contributing to climate change mitigation and adaptation, improving the efficiency of production systems through predictive maintenance, increasing the security of Europeans and the protection of workers, and in many other ways that we can only begin to imagine.

At the same time, AI entails a number of potential risks, such as risks to safety, gender-based or other kinds of discrimination, opaque decision-making, or intrusion in our private lives.

The [European approach for AI](#) aims to promote Europe's innovation capacity in the area of AI while supporting the development and uptake of ethical and trustworthy AI across the EU. According to this approach, AI should work for people and be a force for good in society.

For Europe to seize fully the opportunities that AI offers, it must develop and reinforce the necessary industrial and technological capacities. As set out in the accompanying European strategy for data, this also requires measures that will enable the EU to become a global hub for data.

The current public consultation comes along with the [White Paper on Artificial Intelligence - A European Approach](#) aimed to foster a European ecosystem of excellence and trust in AI and a Report on the safety and liability aspects of AI. The White Paper proposes:

- Measures that will streamline research, foster collaboration between Member States and increase investment into AI development and deployment;
- Policy options for a future EU regulatory framework that would determine the types of legal requirements that would apply to relevant actors, with a particular focus on high-risk applications.

This consultation enables all European citizens, Member States and relevant stakeholders (including civil society, industry and academics) to provide their opinion on the White Paper and contribute to a European approach for AI. To this end, the following questionnaire is divided in three sections:

- **Section 1** refers to the specific actions, proposed in the White Paper's Chapter 4 for the building of an ecosystem of excellence that can support the development and uptake of AI across the EU economy and public administration;

- **Section 2** refers to a series of options for a regulatory framework for AI, set up in the White Paper's Chapter 5;
- **Section 3** refers to the Report on the safety and liability aspects of AI.

Respondents can provide their opinion by choosing the most appropriate answer among the ones suggested for each question or suggesting their own ideas in dedicated text boxes. Feedback can also be provided in a document format (e.g. position paper) that can be uploaded through the button made available at the end of the questionnaire.

## About you

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### \* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☐ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ Gaelic
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

### \* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)

- ☐ Public authority
- ☐ Trade union
- ☐ Other

\* First name

\* Surname

\* Email (this won't be published)

\* Scope

- ☐ International
- ☐ Local
- ☐ National
- ☐ Regional

\* Organisation name

*255 character(s) maximum*

\* Organisation size

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                     |                                          |                                     |                                                        |
|-------------------------------------|------------------------------------------|-------------------------------------|--------------------------------------------------------|
| <input type="radio"/> Afghanistan   | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania       | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |

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| <input type="radio"/> American Samoa                   | <input type="radio"/> Egypt                               | <input type="radio"/> Macau            | <input type="radio"/> San Marino                                   |
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| <input type="radio"/> Bangladesh                       | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova          | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados                         | <input type="radio"/> Gabon                               | <input type="radio"/> Monaco           | <input type="radio"/> South Korea                                  |
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| <input type="radio"/> Bonaire Saint Eustatius and Saba | <input type="radio"/> Guadeloupe                          | <input type="radio"/> Nauru            | <input type="radio"/> Switzerland                                  |
| <input type="radio"/> Bosnia and Herzegovina           | <input type="radio"/> Guam                                | <input type="radio"/> Nepal            | <input type="radio"/> Syria                                        |
| <input type="radio"/> Botswana                         | <input type="radio"/> Guatemala                           | <input type="radio"/> Netherlands      | <input type="radio"/> Taiwan                                       |
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| <input type="radio"/> British Indian Ocean Territory | Guinea-Bissau                | Nicaragua                     | Thailand                          |
| <input type="radio"/> British Virgin Islands         | <input type="radio"/> Guyana | <input type="radio"/> Niger   | <input type="radio"/> The Gambia  |
| <input type="radio"/> Brunei                         | <input type="radio"/> Haiti  | <input type="radio"/> Nigeria | <input type="radio"/> Timor-Leste |

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| <input type="radio"/> Burkina Faso             | <input type="radio"/> Honduras                          | <input type="radio"/> Norfolk Island                        | <input type="radio"/> Tokelau                              |
| <input type="radio"/> Burundi                  | <input type="radio"/> Hong Kong                         | <input type="radio"/> Northern Mariana Islands              | <input type="radio"/> Tonga                                |
| <input type="radio"/> Cambodia                 | <input type="radio"/> Hungary                           | <input type="radio"/> North Korea                           | <input type="radio"/> Trinidad and Tobago                  |
| <input type="radio"/> Cameroon                 | <input type="radio"/> Iceland                           | <input type="radio"/> North Macedonia                       | <input type="radio"/> Tunisia                              |
| <input type="radio"/> Canada                   | <input type="radio"/> India                             | <input type="radio"/> Norway                                | <input type="radio"/> Turkey                               |
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| <input type="radio"/> Chad                     | <input type="radio"/> Ireland                           | <input type="radio"/> Palestine                             | <input type="radio"/> Uganda                               |
| <input type="radio"/> Chile                    | <input type="radio"/> Isle of Man                       | <input type="radio"/> Panama                                | <input type="radio"/> Ukraine                              |
| <input type="radio"/> China                    | <input type="radio"/> Israel                            | <input type="radio"/> Papua New Guinea                      | <input type="radio"/> United Arab Emirates                 |
| <input type="radio"/> Christmas Island         | <input type="radio"/> Italy                             | <input type="radio"/> Paraguay                              | <input type="radio"/> United Kingdom                       |
| <input type="radio"/> Clipperton               | <input type="radio"/> Jamaica                           | <input type="radio"/> Peru                                  | <input type="radio"/> United States                        |
| <input type="radio"/> Cocos (Keeling) Islands  | <input type="radio"/> Japan                             | <input type="radio"/> Philippines                           | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia                 | <input type="radio"/> Jersey                            | <input type="radio"/> Pitcairn Islands                      | <input type="radio"/> Uruguay                              |
| <input type="radio"/> Comoros                  | <input type="radio"/> Jordan                            | <input type="radio"/> Poland                                | <input type="radio"/> US Virgin Islands                    |
| <input type="radio"/> Congo                    | <input type="radio"/> Kazakhstan                        | <input type="radio"/> Portugal                              | <input type="radio"/> Uzbekistan                           |
| <input type="radio"/> Cook Islands             | <input type="radio"/> Kenya                             | <input type="radio"/> Puerto Rico                           | <input type="radio"/> Vanuatu                              |
| <input type="radio"/> Costa Rica               | <input type="radio"/> Kiribati                          | <input type="radio"/> Qatar                                 | <input type="radio"/> Vatican City                         |
| <input type="radio"/> Côte d'Ivoire            | <input type="radio"/> Kosovo                            | <input type="radio"/> Réunion                               | <input type="radio"/> Venezuela                            |
| <input type="radio"/> Croatia                  | <input type="radio"/> Kuwait                            | <input type="radio"/> Romania                               | <input type="radio"/> Vietnam                              |
| <input type="radio"/> Cuba                     | <input type="radio"/> Kyrgyzstan                        | <input type="radio"/> Russia                                | <input type="radio"/> Wallis and Futuna                    |
| <input type="radio"/> Curaçao                  | <input type="radio"/> Laos                              | <input type="radio"/> Rwanda                                | <input type="radio"/> Western Sahara                       |
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| <input type="radio"/> Czechia                  | <input type="radio"/> Lebanon                           | <input type="radio"/> Saint Helena Ascension and Tristan da | <input type="radio"/>                                      |
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Yemen Zambia

☐ Democratic  
Republic of the  
Congo

Lesotho

Saint Kitts and  
Nevis

Zimbabwe

☐ Denmark

☐ Liberia

☐ Saint Lucia

## \* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

### ☒ Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

### ☐ Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☐ I agree with the [personal data protection provisions](#)

## Section 1 - An ecosystem of excellence

To build an ecosystem of excellence that can support the development and uptake of AI across the EU economy, the White Paper proposes a series of actions.

**In your opinion, how important are the six actions proposed in section 4 of the White Paper on AI (1-5: 1 is not important at all, 5 is very important)?**

|                                                                | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important | No opinion            |
|----------------------------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|--------------------|-----------------------|
| Working with Member states                                     | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Focussing the efforts of the research and innovation community | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Skills                                                         | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Focus on SMEs                                                  | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Partnership with the private sector                            | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Promoting the adoption of AI by the public sector              | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |

## Are there other actions that should be considered?

500 character(s) maximum

Collaborations between both public and private universities as well as support from start-up incubators and info-providers should be incentivized. Moreover, the public sector should be an early adopter of AI to improve public services to citizens.

## Revising the Coordinated Plan on AI (Action 1)

The Commission, taking into account the results of the public consultation on the White Paper, will propose to Member States a revision of the Coordinated Plan to be adopted by end 2020.

**In your opinion, how important is it in each of these areas to align policies and strengthen coordination as described in section 4.A of the White Paper (1-5: 1 is not important at all, 5 is very important)?**

|                                                              | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important    | No opinion            |
|--------------------------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Strengthen excellence in research                            | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> |
| Establish world-reference testing facilities for AI          | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> | <input type="radio"/> |
| Promote the uptake of AI by business and the public sector   | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> |
| Increase the financing for start-ups innovating in AI        | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> |
| Develop skills for AI and adapt existing training programmes | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> |
| Build up the European data space                             | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | x                     | <input type="radio"/> |

## Are there other areas that that should be considered?

500 character(s) maximum

An enabling policy environment is key for AI to be an enabler of solutions itself. Common data sources and common ethic framework should be considered to identify best practices, evaluate applicable proper solutions, promote digital transformation in every state and foster environmental protection through AI

### A united and strengthened research and innovation community striving for excellence

Joining forces at all levels, from basic research to deployment, will be key to overcome fragmentation and create synergies between the existing networks of excellence.

**In your opinion how important are the three actions proposed in sections 4.B, 4.C and 4.E of the White Paper on AI (1-5: 1 is not important at all, 5 is very important)?**

|                                                                                                                  | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important               | No opinion            |
|------------------------------------------------------------------------------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| Support the establishment of a lighthouse research centre that is world class and able to attract the best minds | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |
| Network of existing AI research excellence centres                                                               | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Set up a public-private partnership for industrial research                                                      | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |

### **Are there any other actions to strengthen the research and innovation community that should be given a priority?**

500 character(s) maximum

More academic courses with fundamentals IT and AI studies must be provided across Europe, with clearly defined standards of competencies and specialisation. Both private and public companies could be involved in the training. Courses on Data Governance and AI in High school could foster the data culture. Strategic investments under the EU budget should focus on AI enablers (such as R&I clusters and businesses) and areas of strong European expertise, allowing to face international competition.

### Focusing on Small and Medium Enterprises (SMEs)

The Commission will work with Member States to ensure that at least one digital innovation hub per Member State has a high degree of specialisation on AI.

**In your opinion, how important are each of these tasks of the specialised Digital Innovation Hubs mentioned in section 4.D of the White Paper in**

relation to SMEs (1-5: 1 is not important at all, 5 is very important)?

|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
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|                                                                                       | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important | No opinion            |
|---------------------------------------------------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|--------------------|-----------------------|
| Help to raise SME's awareness about potential benefits of AI                          | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Provide access to testing and reference facilities                                    | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Promote knowledge transfer and support the development of AI expertise for SMEs       | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Support partnerships between SMEs, larger enterprises and academia around AI projects | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |
| Provide information about equity financing for AI startups                            | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |

## Are there any other tasks that you consider important for specialised Digital Innovations Hubs?

500 character(s) maximum

Digital Innovation Hubs should be managed by a central European direction with common and approved research objectives. In each State, start-up, universities and companies should be aggregated in innovation hubs with specific research programs to progress. Fostering a broad and speedy AI adoption and innovative solutions by SMEs should also be a priority.

## Section 2 - An ecosystem of trust

Chapter 5 of the White Paper sets out options for a regulatory framework for AI.

**In your opinion, how important are the following concerns about AI (1-5: 1 is not important at all, 5 is very important)?**

|                        | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important | No opinion            |
|------------------------|--------------------------|-----------------------|-----------------------|-----------------------|--------------------|-----------------------|
| AI may endanger safety | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                  | <input type="radio"/> |

|                                                                                                                                 |                                                                                   |                                                                                   |                                                                                   |                                                                                     |   |                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|---|-------------------------------------------------------------------------------------|
| AI may breach fundamental rights (such as human dignity, privacy, data protection, freedom of expression, workers' rights etc.) |  |  |  |  | X |  |
|                                                                                                                                 |                                                                                   |                                                                                   |                                                                                   |                                                                                     |   |                                                                                     |

|                                                                                       |                       |                       |                       |                       |   |                       |
|---------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|---|-----------------------|
| The use of AI may lead to discriminatory outcomes                                     | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X | <input type="radio"/> |
| AI may take actions for which the rationale cannot be explained                       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X | <input type="radio"/> |
| AI may make it more difficult for persons having suffered harm to obtain compensation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X | <input type="radio"/> |
| AI is not always accurate                                                             | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X | <input type="radio"/> |

**Do you have any other concerns about AI that are not mentioned above?  
Please specify:**

*500 character(s) maximum*

A human-centric approach is paramount to build awareness and acceptance. AI should be designed with specific attention to cyber security, data protection and confidentiality. It should always be managed through experience and supervised by data and domain experts.

**Do you think that the concerns expressed above can be addressed by applicable EU legislation? If not, do you think that there should be specific new rules for AI systems?**

- ☐ Current legislation is fully sufficient
- ☒ Current legislation may have some gaps
- ☐ There is a need for a new legislation
- ☐ Other
- ☐ No opinion

**If you think that new rules are necessary for AI system, do you agree that the introduction of new compulsory requirements should be limited to high-risk applications (where the possible harm caused by the AI system is particularly high)?**

- ☐ Yes
- ☒ No
- ☐ Other
- ☐ No opinion

**Other, please specify:**

*500 character(s) maximum*

It's not always immediate to identify high risk applications. Ethical codes should be applied to every AI use case (i.e. predictive maintenance is not a high risk application but can impact workers' employment)

**Do you agree with the approach to determine “high-risk” AI applications proposed in Section 5.B of the White Paper?**

- ☒ Yes  
☐ No  
☐ Other  
☐ No opinion

Other, please specify:

500 character(s) maximum

**If you wish, please indicate the AI application or use that is most concerning (“high-risk”) from your perspective:**

500 character(s) maximum

AI applications on human beings, i.e. safety, healthcare, consumptions, instruction, consumers habits, in addition to environmental applications

**In your opinion, how important are the following mandatory requirements of a possible future regulatory framework for AI (as section 5.D of the White Paper) (1-6: 1 is not important at all, 6 is very important)?**

|                                                         | 1 - Not important at all | 2 - Not important     | 3 - Neutral           | 4 - Important         | 5 - Very important               | No opinion            |
|---------------------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| The quality of training data sets                       | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |
| The keeping of records and data                         | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |
| Information on the purpose and the nature of AI systems | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Robustness and accuracy of AI systems                   | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |
| Human oversight                                         | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |
| Clear liability and safety rules                        | <input type="radio"/>    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | X                                | <input type="radio"/> |

**In addition to the existing EU legislation, in particular the data protection framework, including the General Data Protection Regulation and the Law Enforcement Directive, or, where relevant, the new possibly mandatory requirements foreseen above (see question above), do you think that the use of remote biometric identification systems (e.g. face recognition) and other technologies which may be used in public spaces need to be subject to further EU-level guidelines or regulation:**

- ☐ No further guidelines or regulations are needed  
☐

- ☒ Biometric identification systems should be allowed in publicly accessible spaces only in certain cases or if certain conditions are fulfilled (please specify)
- ☐ Other special requirements in addition to those mentioned in the question above should be imposed (please specify)
- ☐ Use of Biometric identification systems in publicly accessible spaces, by way of exception to the current general prohibition, should not take place until a specific guideline or legislation at EU level is in place.
- ☐ Biometric identification systems should never be allowed in publicly accessible spaces
- ☐ No opinion

Please specify your answer:

In general biometric identification should be used only if applied for public benefit, i.e. identifications, criminal identifications, healthcare.

**Do you believe that a voluntary labelling system (Section 5.G of the White Paper) would be useful for AI systems that are not considered high-risk in addition to existing legislation?**

- ☒ Very much
- ☐ Much
- ☐ Rather not
- ☐ Not at all
- ☐ No opinion

**Do you have any further suggestion on a voluntary labelling system?**

*500 character(s) maximum*

It is also useful to promote existing systems and quality parameters

**What is the best way to ensure that AI is trustworthy, secure and in respect of European values and rules?**

- ☐ Compliance of high-risk applications with the identified requirements should be self-assessed ex-ante (prior to putting the system on the market)
- ☒ Compliance of high-risk applications should be assessed ex-ante by means of an external conformity assessment procedure
- ☐ Ex-post market surveillance after the AI-enabled high-risk product or service has been put on the market and, where needed, enforcement by relevant competent authorities
- ☐ A combination of ex-ante compliance and ex-post enforcement mechanisms
- ☐ Other enforcement system
- ☐ No opinion

Please specify any other enforcement system:

*500 character(s) maximum*

Policy-makers should be in constant dialogue with all stakeholders on AI benefits and ethical concerns.

**Do you have any further suggestion on the assessment of compliance?**

500 character(s) maximum

## Section 3 – Safety and liability implications of AI, IoT and robotics

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The overall objective of the safety and liability legal frameworks is to ensure that all products and services, including those integrating emerging digital technologies, operate safely, reliably and consistently and that damage having occurred is remedied efficiently.

**The current product safety legislation already supports an extended concept of safety protecting against all kind of risks arising from the product according to its use. However, which particular risks stemming from the use of artificial intelligence do you think should be further spelled out to provide more legal certainty?**

- ☒ Cyber risks
- ☒ Personal security risks
- ☐ Risks related to the loss of connectivity
- ☐ Mental health risks

**In your opinion, are there any further risks to be expanded on to provide more legal certainty?**

500 character(s) maximum

Product reliability on specific data domain

**Do you think that the safety legislative framework should consider new risk assessment procedures for products subject to important changes during their lifetime?**

- ☒ Yes
- ☐ No
- ☐ No opinion

**Do you have any further considerations regarding risk assessment procedures?**

500 character(s) maximum

All major changes should satisfy risk assessment

**Do you think that the current EU legislative framework for liability (Product Liability Directive) should be amended to better cover the risks engendered by certain AI applications?**

- ☒ Yes
- ☐ No
- ☐ No opinion

**Do you have any further considerations regarding the question above?**

*500 character(s) maximum*

**Do you think that the current national liability rules should be adapted for the operation of AI to better ensure proper compensation for damage and a fair allocation of liability?**

- ☒ Yes, for all AI applications
- ☐ Yes, for specific AI applications
- ☐ No
- ☐ No opinion

**Please specify the AI applications:**

**Do you have any further considerations regarding the question above?**

*500 character(s) maximum*

**Thank you for your contribution to this questionnaire. In case you want to share further ideas on these topics, you can upload a document below.**

**You can upload a document here:**

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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- Transparency, ethics, accountability



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