

## POSITION PAPER

Brussels, 9 April 2019

# Orgalim Position Paper on Ethics Guidelines for Trustworthy AI

## 1. INTRODUCTION

As a member of the High-Level Expert Group on Artificial Intelligence (HLEG on AI), Orgalim welcomes the publication of the "Ethics Guidelines for Trustworthy AI" developed by the Group.

These Guidelines provide a general framework for stakeholders in the European AI eco-system to apply a set of consensual ethical principles, such as respect for human autonomy, prevention of harm, fairness, and explicability, while addressing potential tensions between these principles. They aim to support the development of AI systems that, beyond fully complying with all applicable laws, are also ethical and technically and socially robust ("Trustworthy AI").

This approach forms an important element of promoting a human-centric approach to AI in Europe, and supporting the continued trust of citizens and businesses in the wide-spread integration of AI into our society and economy. To ensure the Guidelines deliver on these objectives, we believe a stronger sectoral approach needs to be introduced in the forthcoming piloting process.

## 2. THE NEED FOR A SECTORAL APPROACH

Orgalim represents an industry branch which has been, for many years, producing and using AI applications (often understood as "Industrial AI" or "Embedded AI") that have proven extremely promising for the global competitiveness of Europe's economy and the welfare of our societies. As such, we continue to believe that these Guidelines, which "build a horizontal foundation to achieve Trustworthy AI", need to be completed by a sectoral approach taking into account "the context-specificity of AI systems".

While discussions about the ethics of AI are necessary, not least to address misunderstandings about the exact nature and functions of AI, they are not equally relevant for every use case in every sector of industry

*Orgalim represents Europe's technology industries: companies that innovate at the crossroads of digital and physical technology. Our industries develop and manufacture the products, systems and services that enable a prosperous and sustainable future. Ranging from large globally active corporations to regionally anchored small and medium-sized enterprises, the companies we represent directly employ 11 million people across Europe and generate an annual turnover of around €2,000 billion. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.*

or services. For example, machine-to-machine exchange of data on the inspection of a production line or of a high voltage electricity transmission network does not raise the same level of critical concerns as consumer oriented applications based on personal data.

### 3. THE PILOTING PHASE

The need for a sectoral approach is why Orgalim fully supports the proposal by the HLEG on AI of a piloting process to be carried out during the second half of 2019. This process will cover both the governance structure to be put in place and the assessment list to be used at company level, as proposed in Chapter III of the Ethics Guidelines. We believe it is critical that the process leads to the adoption of assessment lists and governance structures that are sector-specific and/or specific to different company-sizes and thus vary in impact on individuals, society or environment.

The HLEG on AI has proposed that the piloting phase should comprise two parallel processes: a general “quantitative” process consisting of an open consultation, and a more focused “qualitative” process where a small selection of companies, organisations and institutions will provide in-depth feedback.

Orgalim stands ready to contribute to the piloting phase, notably by providing the consensual view of a very large sector of Europe’s industry in the “qualitative” process, which we believe will be a necessary complement to individual companies’ contributions to make the future approach workable. We look forward to the European Commission’s guidance on how these processes will be organised.

### 4. BEYOND THE ETHICS GUIDELINES

Creating favourable conditions for the development of Trustworthy AI - in a highly competitive international context - is obviously not limited to the adoption of Ethics Guidelines, even if those can contribute to Europe’s competitive advantage on AI. Over the next weeks and months, we will continue to actively support work on the second deliverable expected from the HLEG on AI: a set of Policy and Investment Recommendations. Setting a pro-innovation policy framework and boosting investment will be fundamental for keeping European industry in the global AI race.