



Comments from members of the Art.17 Dialogue on the Ethics Guidelines by the AI HLEG

The Church of Greece, EKD (German Evangelical Church), EHF (European Humanist Federation), CEC (Conference of European Churches) and COMECE (The Catholic Church in the EU) sent written comments about the draft Ethics Guidelines published by the HLEG on AI in December 2018 to JUST/C2. This is an overview of the main points from the five documents we received so far. NB: EKD, CEC and COMECE criticize the timing and duration of the consultation period.

The **EKD** cautions against the instrumentalisation of ethics for economic reasons and “a positive bias towards AI”. EKD highlights the need for guidance regarding situations where ethical principles contradict each other. EKD has questions about the addressees and the final result of the guidelines (regulation, code of conduct, etc.) and suggests to clarify whether a sanction mechanism is foreseen. EKD recommends more tailored group-specific addressees. The guidelines’ section about scoring should also apply to scoring by private actors. EKD recommends human rights impact assessments with regard to algorithms. Explicability should be guaranteed towards public authorities and trusts.

The **CEC** “argue for a more expansive understanding of stakeholders to include all those passively or actively impacted by—not just directly developing, deploying, or using—AI.” CEC highlights a tension between the individual and the common good in the guidelines and suggests clarifying this in the final guidelines. CEC recommends placing ecological concerns on par with human wellbeing. CEC highlights that the “section on Lethal Autonomous Weapon Systems LAWS makes no mention of the EU’s direct relationship with military application of robotics and AI through the European Defence Fund”. Regarding the assessment-section of the guidelines, CEC sees a need for clarification of the concept of accountability and a need to address systemic dimensions (concentrations of power, commodification of human relationships).

The **EHF** observes that zero risk does not exist (including the use of AI) and urges to address the question what social risks we are willing to accept. This can only be done via democratic processes. EHF proposes that Trustworthy AI should be socially controlled on an ongoing basis and to create a “European Observatory of AI Technologies and Services” to this end. EHF states that citizens should be more empowered and more actively involved than just by observation of their informed consent. EHF emphasizes the need for trainings and education on AI.

COMECE highlights that different stakeholders have different views of the common good and need to perform different ethical assessments. Different interests need to be balanced. COMECE underlines that human life has not only a personal but also a community dimension, which AI should serve. COMECE advises to align the terminology of the guidelines with EU fundamental rights law where applicable. AI in the security and defence domain needs to comply with relevant international law. Ethically questionable technologies should not receive EU funding.

The **Church of Greece** sent general comments and highlights an individualistic conception of the humans being at the basis of the draft guidelines. It advocates for a relational conception of human beings, with a stronger focus on a social principle, where life in society is taken into account. The Church opposes anthropomorphic simulations of AI and calls for regulation to prevent such simulations.