RESPONSE TO EUROPEAN COMMISSION STAKEHOLDER SURVEY ON "INTERNATIONAL DRAFT G7 GUIDING PRINCIPLES FOR ORGANIZATIONS DEVELOPING ADVANCED AI SYSTEMS"

The Association for Computing Machinery (ACM) is the world's largest and longest established professional society of individuals involved in all aspects of computing. It annually bestows the ACM A.M. Turing Award, often popularly referred to as the "Nobel Prize of Computing." ACM's Europe Technology Policy Committee ("Europe TPC") is charged with and committed to providing sound scientific and technical information to policy makers and the general public in the service of sound public policymaking. Such Europe TPC contributions include submissions concerning European Union regulatory initiatives on the AI Act,[1] Data Act,[2] Digital Services Act,[3] Cyber Resilience Act,[4] and the 2030 Digital Decade Policy Programme,[5] among others. ACM and Europe TPC are non-profit, non-political, and non-lobbying organisations.

On 13 October 2023, the European Commission announced[6] a survey seeking stake-holder input on the eleven [International Draft G7 Guiding Principles for Organizations Developing Advanced AI Systems](#) jointly developed by the European Union and G7 member nations. Building on the Hiroshima Artificial Intelligence process, the principles are intended to inform the production of global "guardrails" for the development and deployment of advanced AI systems, including foundation models and generative AI technologies, and an associated Code of Conduct. Europe TPC is pleased to respond to the European Commission's survey, as follows:[7]

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[1] [Comments to European Commission on Proposed AI Regulations](#), ACM Europe Technology Policy Committee (August 5, 2021)

[2] [Comments in European Commission Data Act Consultation](#) (May 13, 2022)

[3] [Comments to European Commission re Regulated Data Access Under the Digital Services Act](#) (May 23, 2023)

[4] [Comments in European Commission Cyber Resilience Act Consultation](#) (January 23, 2023)

[5] [Comments to European Commission re Key Performance Indicators for 2030 Digital Decade Policy Programme](#) (March 13, 2023)

[6] https://digital-strategy.ec.europa.eu/en/news/commission-gathers-views-g7-guiding-principles-generative-artificial-intelligence

[7] Europe TPC's responses also were submitted electronically via the Commission's [online survey form](#).

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SURVEY RESPONSE CONTENT

Question 1.

To what type of organizations employing AI should those guiding principles apply?

> **Answer**:

> [x] Developer - an organisation that designs, codes, or produce AI systems)

> [x] Deployer - an organisation that uses AI systems

> [x] Distributor - an organisation other than the developer that makes an AI system available on the market

> [x] Other actors in the AI value chain (please specify below)

> Internal stakeholders within an organisation, such as operators of AI systems or internal users leveraging the AI systems for purposes that relate or affect the end-users.

Question 2.

Please indicate how important you consider each of the following principles on a scale from 1 (= not very important) to 5 (= very important) Additional help available

Please evaluate the importance of each principle to achieve the main objective of providing effective and proportionate guardrails on advanced AI systems on the global level and solicit views on any possibly missing elements or actions. (1   2   3   4   5)

* Principle 1: Take appropriate measures throughout the development of advanced AI systems, including prior to and throughout their deployment and placement on the market, to identify, evaluate, mitigate risks across the AI lifecycle.

> **Answer: 5**

* Principle 2: Identify and mitigate vulnerabilities, and, where appropriate, incidents and patterns of misuse, after deployment including placement on the market.

> **Answer: 5**

* Principle 3: Publicly report advanced AI systems' capabilities, limitations and domains of appropriate and inappropriate use, to support ensuring sufficient transparency.

> **Answer: 5**

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* Principle 4: Work towards responsible information sharing and reporting of incidents among organizations developing advanced AI systems including with industry, governments, civil society, and academia.

Answer: 5

* Principle 5: Develop, implement and disclose AI governance and risk management policies, grounded in a risk-based approach – including privacy policies, and mitigation measures, in particular for organizations developing advanced AI systems.

Answer: 5

* Principle 6: Invest in and implement robust security controls, including physical security, cybersecurity and insider threat safeguards across the AI lifecycle.

Answer: 5

* Principle 7: Develop and deploy reliable content authentication and provenance mechanisms such as watermarking or other techniques to enable users to identify AI-generated content.

Answer: 5

* Principle 8: Prioritize research to mitigate societal, safety and security risks and prioritize investment in effective mitigation measures.

Answer: 5

* Principle 9: Prioritize the development of advanced AI systems to address the world's greatest challenges, notably (but not limited to) the climate crisis, global health and education.

Answer: 5

* Principle 10: Advance the development of and, where appropriate, adoption of where appropriate, international technical standards.

Answer: 5

* Principle 11: Implement appropriate data input controls and audits.

Answer: 5

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* Question 3. In these Guiding Principles, G7 Members also commit to develop proposals to introduce monitoring tools and mechanisms to help organizations stay accountable for the implementation of these actions. How this monitoring mechanism should look like? (multiple answers possible)

    [x] monitoring by an internationally trusted organisation

    [x] national organisations

    [x] self-assessment

    [   ] no monitoring

Question 4. The Draft Guiding Principles include a non-exhaustive list of 11 guiding principles addressed to the developers of AI systems. It will be discussed and elaborated as a living document that might be completed after Leaders' endorsement, do you have any specific suggestions to add new principles to the list or modify the existing ones?

EuropeTPC supports the international effort to propose a list of non-exhaustive guiding principles for organisations developing AI systems. EuropeTPC also commends the Commission's attention to its analyses and recommendations in the Europe TPC policy documents referenced below which, it respectfully submits, may be leveraged to further enhance development of these guiding principles:

Suggestion 1. Consult Europe TPC's joint "Statement on Principles for Responsible Algorithmic Systems"[8] and assure that the principles it identifies are fully reflected in the final document developed by the Commission and G7 nations. We call the Commission's attention, in particular, to principles that should be considered as part of the description of the eleven G7 guiding principles for developers of AI systems. Namely principle: 1) on Legitimacy and Competency; 2) on Minimising Harm; 5) on Interpretability and explainability; 6) on Contestability and Auditability; and 8) on Accountability and Responsibility. We believe the remaining ACM principles are, at least in part, encompassed within the text of the G7 proposed principles. (They are principles: 3) on Security and Privacy; 4) on Transparency; 6) on Maintainability; and 9) on Limiting Environmental Impacts.)

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[8] https://www.acm.org/binaries/content/assets/public-policy/final-joint-ai-statement-update.pdf

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Suggestion 2. Consider our joint "Principles for the Development, Deployment, and Use of Generative AI Technologies."[9] Europe TPC believes that the principles it proposes on Ownership and Correctability (numbers 2 and 4, respectively) to be particularly relevant in this context.

Suggestion 3. Europe TPC also calls the Commission's attention to the "ACM Code of Ethics and Professional Conduct," which is intended to guide the work of our 100,000 individual global members and informs all ACM policy committee products. The Code delineates seven general ethical principles, articulates nine professional responsibilities, and defines seven additional professional leadership principles. It also includes two germane "compliance guidelines."

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[9] https://www.acm.org/binaries/content/assets/public-policy/ustpc-approved-generative-ai-principles

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