DNV's remarks to EU's proposed AI act

1) The proposal uses a broad definition of AI, yet it is prescriptive on high-risk applications.

More goal-oriented requirements focusing on fundamental values could provide more flexibility for innovation.

2) The proposal is not fully aligned with ISO 31000's perspective on risk as "effect of uncertainty on objectives".

Weak knowledge warrants caution in cases where probabilities and consequences cannot be asserted with confidence.

3) The proposal lacks a systemic perspective on risk.

AI components that do not serve safety functions may nevertheless be sources of risk on system level.

4) More guidance is needed on conformity assessment of continuously learning systems.

Harmonised standards are needed to guide how conformity assessments can be validated or updated on a continuous basis.

5) The proposal gives a limited role to notified bodies in conformity assessment

A stronger third-party role may be needed for societies and citizens to build trust in AI.

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