
Fra: Anne Marthine Rustad <AnneMarthine.Rustad@sintef.no>
Sendt: 14. juni 2021 11:58
Til: Hafskjold Christine
Kopi: Lene Lad Johansen
Emne: Høringsinnspill fra SINTEF

Hei Christine,

Takk for invitasjon til høringsrunden.

Under er innspillene fra SINTEF skrevet ned. Du hørte en del av dette inn innspillsmøtet til Abelia, og vi har sammenfattet det under. Beklager at innspillene våre kommer noen dager etter fristen. Jeg håper likevel de kommer tidsnok til at arbeidet med tilbakemelding til EU.

Med vennlig hilsen

Lene og Anne Marthine

About SINTEF

SINTEF is one of Europe's largest independent research organisations. Every year we carry out several thousand projects for customers from industry, businesses, and public sector. Our vision is: Technology for a better society.

SINTEF applauds the efforts taken to put forward a proposal to harmonize the rules on artificial intelligence. The proposal sets an ambitious target to balance between risk and benefits that emerges from the research on, and implementation of, artificial intelligence. The need for regulations or standards for artificial intelligence has long been debated, creating an uncertainty for investors and business. We support the efforts taken to implement regulations to secure a value based, human-centric AI development.

Our main input:

Need for flexibility and predictability

The proposal targets to set a robust yet flexible legal framework. This is, in our opinion, a sensible target, however we question how achievable it is. Creating regulations for a technology still under development is challenging. Both the technology and the risk connected will be object to change and debate. Making regulations that are flexible enough to allow for development and at the same time providing the predictability needed to make investment decisions are challenging.

The risk-based approach

SINTEF supports the risk-based approach proposed in the regulation. The approach is comprehensive and contributes to differentiate between various application of AI. Not all AI research and development are connected to the same type of risk. This acknowledgement is in our opinion very positive. The fact that the risk is connected to the use and application of AI – not the technology as such is very positive.

AI regulatory sandboxes and research

SINTEF welcomes the AI regulatory sandboxes. Reducing the regulatory burden for researchers and supporting SMBs and start-ups are key to keep European AI- research at the

global forefront. SINTEF supports the efforts taken to connect the European AI-community through Digital Europe. The yearly 1 billion investment in AI through Horizon Europe and the Digital Europe program is very positive. However succeeding in mobilizing private investments is crucial for the successful uptake and implementation of AI technology in Europe.

Need for a clear and understandable regulation

To ensure the success of the strategy, the European AI regulation needs to be comprehensive and the connections to other relevant regulations easy to understand. We find the relationship between the proposed regulation and the existing policy related to AI challenging to understand. Specifically regarding the use of AI in products and services that are already subject to existing regulations.

Anne Marthine Rustad, PhD
Forskningsleder Analytics og AI
SINTEF Digital
Mobil: +47 93203879
www.sintef.no

Lene Lad Johansen
Senior business developer EU
SINTEF Digital
Mathematics and Cybernetics
+47 986 02 759