

To the EU High Level Expert Group on Artificial Intelligence
Via email: CNECT-HLG-AI@ec.europa.eu

Brussels, 30 November 2019

Dear Madam/Sir,

The European Evangelical Alliance is a pan-European movement serving the estimated 23 Million Evangelical Christians across the continent. In collaboration with an interdisciplinary group of experts in the field, we have studied the EU Ethics Guidelines for Trustworthy AI and Policy Recommendations. The guidelines address many valuable points we fully support. In addition to these points, however, we would like to raise the following concerns:

- Societal Engagement: Any technology which has the potential to significantly impact on our society (both for good and for bad) demands a broad and permanent well-informed dialogue in society itself to establish legitimacy before deployment of applications that could cause harm to individuals and wider society.
- Protecting from harms to humanity: AI used for convenience, efficiency and speed in automated or semi-automated decision-making and for managing information could cause fundamental skills necessary for self-determination (such as critical thinking and analytical questioning) to diminish. This would have a serious impact on people's ability to make decisions (both ethical and moral). Other AI applications also pose risks to a number of other aspects of what it means to be a human being such as moral autonomy, relationships and freedom of choice. We want to ensure that AI is developed to enhance rather than to diminish our skills for decision-making and scope for self-determination in a digital age.
- Responsible, accountable AI requires oversight which is consistent and legally enforceable internationally: We believe that humanity will only be protected from harm in certain potential use areas of AI if appropriate legislation, regulation and human oversight measures are put in place. We would like to see this area developed more thoroughly in the context of the specific harms outlined both by the EU High Level Expert Group on AI (HLEG) in its Guidelines, Policy Recommendations, and in this document.

We will explain these concerns in a bit more detail below, but we would welcome the opportunity to meet with you to discuss these issues in more depth.

Societal engagement

AI (in a different way to any other technology before it) presents real challenges and real opportunities to us about (1) what it means to be human and (2) what kind of society we want to create.

If we truly want to make a success of this “Digital Revolution” and harness the power of AI for good and not for harm, then we must raise public awareness. This is not simply to educate and give people knowledge and access to information. We must first establish a level of *awareness* and *understanding* of the subject; its significance and key issues across society. This requires societal engagement which is broad, diverse and inclusive, leaving no one behind (not being distorted through over or under representative voices). The type of engagement required is two-way: a means for building understanding, and a tool for shaping, framing and directing AI. It is only when we have achieved this that individuals and communities will be equipped to make informed and coherent decisions about AI based on relevant technical, ethical, religious and social considerations.

We feel that there is a need for a slowdown in adoption in some key areas and for the public to be involved in debate and policy making, rather than just being educated to accept the status quo and the benefits of AI.

Today, public understanding of these technologies is driven by the tabloid press and political groups promoting extreme positions, with ideas of robocops, rebellious androids and, more seriously, talk of mass unemployment, capturing the public’s imagination.

Debate around AI is being held among the intellectual, political and professional specialists in terms that are largely impenetrable to the public. This must change. Society must be truly engaged in their communities and play an active part of the governance and human oversight infrastructure. Whether it is through regulatory citizen’s panels, data trusts, civil society organisations or churches; understanding must increase. Voices of both those digitally and socially included and those digitally and socially excluded need to be heard. This effort must be international.

Taking learnings from historical public engagement around climate change, human fertilisation and embryology, we would welcome the opportunity to discuss potential new approaches and practical models with you.

Protection from harms to humanity

We welcome the HLEG’s acknowledgment that humans are moral beings and there is a need to observe and protect human autonomy in all its guises, including human dignity and free choice. Furthermore, as Christians we strongly support the emphasis in the guidelines on human dignity and the “human-centric approach” in which the human being enjoys a unique and inalienable moral status of primacy in the civil, political, economic and social fields.’¹

In our view, the HLEG Guidelines and Recommendations lack precision about what constitutes harm to the individual or society. We propose that the following areas (which all have empirical evidence

¹ Ethics Guidelines for Trustworthy AI, High-Level Expert Group on Artificial Intelligence, European Commission, 8 April 2019. P10

behind the potential harms), need to be given more attention and should be the subject of further empirical research and ethical debate.

Virtual Reality and Augmented Reality gaming. Whilst there is sufficient evidence for the addictions that can result from such applications, there is insufficient empirical evidence yet available on the harms due to its use in professional contexts like training. Age limits should be considered on addictive technologies like VR and AR to protect children and health warnings provided for adult consumption including recommended hours of use.

Replacement of manual jobs by robotics. Whilst there are positive impacts in dangerous or hazardous work, we have a moral responsibility to consider how meaningful jobs can be provided for those who are displaced.

Replacement of cognitive tasks by AI, especially in white collar work like HR, Accountancy, Law and Medicine. Insufficient empirical evidence has been collected on the long-term impacts on mental acuity of these applications. We should not be careless about secondary erosion of cognitive skills that could follow, like that which has followed the introduction of other ostensibly helpful technologies like 'satnav' and calculators.

Autonomous vehicles or other objects given moral agency. We believe that humans alone have moral agency and it should not be given to an artefact. We would like to see the recommendations provide a ban not only on autonomous weapons, but also of other artefacts where moral agency is ascribed. This could include fully autonomous vehicles.

Personified AI artefacts such as digital assistants, chatbots, toy and adult robots. There is empirical evidence for the harm that such technologies are doing to society in terms of diminished empathy, relationships, ethical obligation to an artefact. The desire that tends to follow these to confer rights on artefacts have negative impacts on our humanness.

Public and Private surveillance and risk scoring. We support the ban of the use of surveillance by the state and would add that legislation should be in place to ban the storage of digital data on individuals obtained without the explicit and informed consent of the individual (examples include facial images, gait analysis, audio recordings, GPS coordinates etc) regardless of whether this data is being held by private companies or on behalf of legitimate public bodies.

Undermining the democratic processes, there is compelling evidence of covert disruption of democratic processes around the world driven by misuse of AI-enriched digital technologies.

Our European democracy is built on a foundation of self-determination. That self-determination should be without manipulation and/or coercion from outside agencies, be they from our own or foreign governments, political groups or commercial businesses enacted in and through AI.

Many of the challenges posed by AI to humanity are being mediated through Big Tech companies whose sole interest is increasing engagement with their free platforms to increase their profits. This, as we are sure the committee knows, are obtained through the packaging and processing of user data that is sold to advertisers.

If algorithmic systems have the power to affect our decision-making ability, then we must be wary of its ability to impact our freedom of thought, our freedom of conscience and our freedom of religion.

These potential harms need to be clearly mitigated. Lessons must be learned from the past decade of incremental erosions to self-determination as seen through examples like:

- Facebook's 'experiment' to see if it could influence the number of people who voted in the US mid-term elections on November 2nd 2010².
- Niantic Labs augmented reality game Pokémon GO, used the concept of a game to experiment in how far players behaviours outside of the game could be influenced by the gameplay itself.

The above is far from an exhaustive list of potential harms, and does not include the many other examples of the use of data (not just personally identifiable data) and algorithmic systems to recommend and augment decision-making which also resulted in socio-economic injustices, discrimination and bias, such as HART³, COMPASS⁴ and Amazon's Human Resources tool⁵.

This obviously raises some fundamental questions about the business practices which have utilised data (not just personally identifiable data) and influenced the design and purpose to which algorithmic systems have been put.

Self-determination is essential for human flourishing in a digital age. In short, this means our decision-making should not be unwittingly incumbered.

Clearly observed self-determination should result in us:

- being able to choose what we see and what we do not (not have our email and internet searches filled with unsolicited, unwanted and curated information) in an informed way;
- knowing when search results are being massaged by algorithmic systems (or not) and/or if they are sponsored and by whom;
- knowing when we are being led by recommender engines or other technologies towards pre-determined commercial or political outcomes;
- not using algorithmically generated recommendations or scores as the sole input for decision-making but triangulating the information and understanding the factors that have contributed to such outcomes.

² [Robert M Bond et al. "A 61-Million-Person Experiment in Social Influence and Political Mobilization," Nature 489, no. 7415 (2012): 295-98, <https://doi.org/10.1038/nature11421>] This experiment was run outside all accepted frameworks of ethical assessment. It demonstrated that voter behaviour could be influenced through specific cues and design of the Facebook newsfeed.

³ In the UK, Durham Police used an AI tool to help risk assess those within their custody suite for their likelihood to reoffend. Further details House of Commons Science and Technology Committee Algorithms in decision-making report May 2018 <https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/351/351.pdf>

⁴ In the US and the case of Wisconsin v Loomis, the judge abdicated some of their sentencing decision-making to an neural network risk based tool which presented the human decision-maker with a score: <https://www.wired.com/2017/04/courts-using-ai-sentence-criminals-must-stop-now/>

⁵ AI was used to assist in the recruitment selection process of Amazon: <https://www.reuters.com/article/us-amazon-com-jobs-automation-insight/amazon-scraps-secret-ai-recruiting-tool-that-showed-bias-against-women-idUSKCN1MK08G>

Regulation

For the guidelines to be applied, we would like to see the implementation of regulatory and non-regulatory measures to facilitate responsible and accountable AI. To give effect to this requires a mandatory and consistent international framework; self-regulation has proven itself not to work. To remain responsive and an enabler to technological innovation, this demands a robust infrastructure of measures, including regulation, licensing, and international standards coupled with human oversight and governance that engages both industry and society. This human oversight should cover the whole spectrum of the innovation lifecycle from data collection and collation, design, development, deployment through to continued evaluation of both data, algorithmic systems, and artefacts.

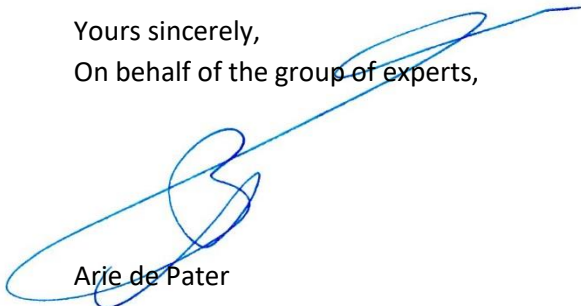
Concluding remarks

As we are an interdisciplinary and international group of experts involved in AI who can bring a unique Christian perspective, we would welcome the opportunity for further discussion with the HLEG on the points we raise above, as well as on the potential for human digital rights to be enshrined in law to reinforce consumer and employment protection. This could be significant to the EU's forthcoming investments in areas such as health, connected and automated driving, agriculture, manufacturing, energy, next generation internet technologies, security and public administrations (including justice), and embodied AI/robotics.

We trust that these points will serve the HLEG in their discussions and we thank you for your time and attention to these important matters.

We are looking forward to your invitation.

Yours sincerely,
On behalf of the group of experts,



Arje de Pater
Brussels Representative