

15 November 2024

**COMMENTS IN RESPONSE TO
EUROPEAN COMMISSION CALL FOR EVIDENCE SURVEY
ON “ARTIFICIAL INTELLIGENCE - IMPLEMENTING REGULATION ESTABLISHING A
SCIENTIFIC PANEL OF INDEPENDENT EXPERTS”**

The Association for Computing Machinery (ACM) is the world’s 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 technical information to policy makers and the general public in the service of sound public policymaking. Europe TPC has responded to the European Union stakeholder’s consultations in the past in the context of the AI Act¹, the Data Act², the Digital Services Act^{3,4}, the Digital Citizen Principles⁵, the Cyber Resilience Act⁶, amongst others⁷. ACM and Europe TPC are non-profit, non-political, and non-lobbying organisations.

Europe TPC is pleased to respond to the European Commission’s call for evidence survey launched on 18 October 2024 on “**Artificial Intelligence - Implementing Regulation Establishing a Scientific Panel of Independent Experts**”. Europe TPC supports the European Commission’s intent on establishing a scientific panel of independent experts to advise on, and assist the AI Office and national market surveillance authorities with implementing and enforcing the AI Act. Notwithstanding this general support, EuropeTPC would like to raise **three recommendations** related to the policy paper as currently drafted.

The **three key recommendations** are as follows:

1. The European Commission should outline in more detail the scope of work of the scientific panel before restricting or defining the number of experts, as this would have

¹ <https://www.acm.org/binaries/content/assets/public-policy/europe-tpc-comments-ai-consultation.pdf>

² <https://www.acm.org/binaries/content/assets/public-policy/acm-eur-tpc-data-act-comments-13may22a.pdf>

³ <https://www.acm.org/binaries/content/assets/public-policy/europetpc-digital-services-act-comments.pdf>

⁴ <https://www.acm.org/binaries/content/assets/public-policy/acm-europe-tpc-dsa-comments.pdf>

⁵ <https://www.acm.org/binaries/content/assets/public-policy/europetpc-comments-digital-principles.pdf>

⁶ <https://www.acm.org/binaries/content/assets/public-policy/acm-europe-tpc-cyber-resilience-comments-pdf>

⁷ <https://www.acm.org/public-policy/public-policy-statements>

implications on the total number of experts allocated based on the number of sub-areas, type of engagements, etc.

2. The scope of expertise requested by the panel may require further consideration to go beyond purely technical/scientific expertise. Depending on the respective areas of expertise required, there may be important skills required, such as ethics, law, socio-economic impacts, behavioural sciences, etc.
3. The limit of maximum 3 experts per member state should consider the importance of access to specific and high-demand expertise, which may be available only in certain regions. This is particularly important when considering new AI applications that require nuanced expertise in respective scientific expertise, which may need to take precedence