

20 April 2021

Re: Application for Global Partners Digital to participate in the Ad hoc Committee on Artificial Intelligence as an Observer

Dear President Strojin,

I am writing to you in order to request that Global Partners Digital (GPD) be admitted to join the Council of Europe's Ad hoc Committee on Artificial Intelligence as an observer.

By way of background, GPD is an international human rights organisation working to enable a digital environment underpinned by human rights. In pursuit of this mission, we work with stakeholders at the international, regional and national levels to support the development of legal and policy frameworks relating to the internet and digital technology consistent with international human rights law and standards. We are at a critical moment when it comes to governance and regulation of AI, and while we recognise that the work of CAHAI is well underway, we nonetheless believe that we could add significant value to the process as an observer in three ways.

1. Extensive experience of human rights and AI policymaking

Emerging technologies, including AI, is one of three core policy areas on which we seek to ensure the development of human rights-respecting legal and policy frameworks. We have substantial experience both in terms of analysis of AI technologies and their impacts on human rights, as well as appropriate legal and policy responses. We are currently engaging in a number of other key forums seeking to shape AI norms and standards, including UNESCO's Recommendation on the Ethics of Artificial Intelligence, the European Unions' proposed Regulation on Artificial Intelligence, relevant Resolutions at the UN Human Rights Council and General Assembly, and at the International Telecommunication Union. As the Secretariat of the Freedom Online Coalition (FOC), GPD facilitated the development of the FOC's [joint statement on artificial intelligence](#) and the ongoing work of its Taskforce on Artificial Intelligence and Human Rights (T-FAIR). In partnership with Stanford University, we published a [report](#) in 2020 assessing national policy frameworks on AI - particularly National Artificial Intelligence Strategies - from a human rights perspective and set out a number of recommendations to governments on AI governance. We have also worked with a number of large tech companies, advising on the development and deployment of certain AI technologies, as well as inputting into a number of human rights impact assessments.

2. Familiarity with the Council of Europe and existing CAHAI stakeholders

As an organisation, we have worked with a number of processes within the Council of Europe, particularly the Cybercrime Programme Office, both with the Global Action on Cybercrime Extended (GLACY)+ project to ensure the development of human rights-respecting cybercrime frameworks in line with the Budapest Convention, and jointly on efforts at other forums to develop human rights-based approaches to cybersecurity governance. In addition, we have worked closely over the years with a number of the governments of Council of Europe member states, most notably through our role as Secretariat to the FOC, 19 of whose members are also member states of the Council of Europe. Finally, we have also worked closely over the years with many of the other civil society organisations engaging in CAHAI, particularly Access Now, Algorithm Watch and the European Center for Not-for-Profit Law. With only a small number of civil society

organisations currently Observers at CAHAI, our existing coordination with these groups would enable additional capacity to be provided and for limited resources to be more evenly distributed among civil society Observers.

3. Bringing perspectives from under-represented regions and voices

GPD works in partnership with civil society organisations around the world, in particular from Latin America, SubSaharan Africa and Asia. Through a range of projects, we provide substantive capacity-building and financial support, and support coordination at key global forums such as the UN First Committee and the ITU. As a result, we have strong partnerships and relations with organisations who are following AI policymaking in their national contexts across all three regions, and are developing a suite of tools and resources to build their own capacity to engage through our [Online AI Policy Hub](#). While we recognise that CAHAI's focus is on an instrument to be developed under the auspices of the Council of Europe, it is highly likely that non-member states will be encouraged or able to endorse or adopt any instrument, and many others may use it to help shape their own national policy frameworks. Indeed, many of our partners outside of Europe have highlighted the CAHAI process to us as critically important but have limited capacity and ability to participate. Hearing the perspectives and voices of organisations on the ground from outside of Europe is critical to ensuring that any instrument meets the needs of different contexts and societies. Our experience and partnerships will enable us to bring these perspectives to the work of CAHAI, helping make sure any final outputs will be relevant and appropriate for states beyond Europe.

We would be glad to present our application to the next Plenary meeting of CAHAI if this would be helpful and are available in the meantime to answer any questions you may have.

For more information about GPD and our work on AI and emerging technologies, feel free to visit our website www.gp-digital.org.

Should you have any questions, please do not hesitate to contact us by emailing Richard Wingfield (richard@gp-digital.org).

Yours sincerely,



Lea Kaspar
Executive Director