

Dear Members of the AI High-Level Expert Group,

Thank you for sharing the pilot version of the [non-exhaustive Trustworthy AI assessment list](#). Allied for Startups commits to support startups in their positive vision and ambitions. Recent advances in AI research are a prime example of the enormous possibilities that technology and innovation can bring to Europe's societies and economies. After consulting with 46 member associations, Allied for Startups is sharing the following feedback.

Fundamentally, the goal of the list should be to reduce the cost of building and maintaining Trustworthy AI for entrepreneurs. Whether a self-assessment list adds or reduces costs for an entrepreneur is decisive if this list is meant to be employed on a large level by startups in Europe.

There are two reasons why the self-assessment list is especially relevant for startup entrepreneurs, and why making accurate questions is therefore fundamentally in the interest of the AI High-Level Expert Group. Firstly, unlike big corporations, startup entrepreneurs have less time and resources to engage in policy debates. Focused on building the next big thing, the assessment list should therefore be designed for a startup entrepreneur to easily comprehend and check. Relevance, specificity and proportionality are key in this regard. Secondly, startup entrepreneurs are, by definition, creating something new. That means that a new product/service would be unlike any preconceptions or established business model. This makes it harder to make specific questions for them. It also makes it all the more important that the assessment list takes into account that there are innovative businesses and services yet to be launched that should not be hindered simply because they were not considered at this time.

Questions in the self-assessment list should be as specific as possible and at the same time remain principle-based and technologically neutral. The following questions show, on an exemplary basis, where further explanation and context is necessary:

- Did you consider the potential impact or safety risk to the environment or to animals?
- In those use cases where there can potentially be a negative impact on fundamental rights, did you carry out a fundamental rights impact assessment?
- Did you ensure that the AI system clearly signals that its social interaction is simulated and that it has no capacities of "understanding" and "feeling"?
- Did you establish a mechanism to identify relevant interests and values implicated by the AI system and potential trade-offs between them?

The aforementioned questions highlight some of the structural shortcomings of the list. Putting oneself in the shoes of a startup entrepreneur, who might be in a small team of a

few people, highlights why it is still difficult to use the list. Questions pertaining to good product design are not necessarily best placed in the Trustworthy AI self-assessment list, especially not if they are already covered in other legislation. Rather, this list can focus on AI-specific aspects, such as data bias or explainability, where it has the potential to have an added value. When looking at the list from the perspective of a startup entrepreneur, it might be more accessible if it was organised along broad product development cycles.

Questions should be more targeted towards an answer that leads to actionable recommendations. Moreover, they should be proportional to the extent that they only ask necessary questions to an entrepreneur.

In terms of general applicability, it might be worth making the different question categories clear at the outset, so as not to overwhelm an entrepreneur but rather give them the opportunity to identify upfront which categories they need to pay attention to. In many startups, the founder might also be the person in charge of compliance, director of operations and HR Manager. Accordingly, they might not yet have acquired the in-depth technical expertise of any given role. Ideally, the self-assessment list could navigate that entrepreneur to the considerations they should be making, without overloading them.

As the AI HLEG intends to do, the questions do encourage critical reflection. We hope that our feedback can contribute to ensuring that the questions are as helpful and effective as possible for startup entrepreneurs, and are available if you have any questions.

Sincerely,

Benedikt Blomeyer  
Manager European Affairs, Allied for Startups