We appreciate the opportunity to comment on the draft Commission Implementing Regulation outlining the rules for applying Regulation (EU) 2024/1689, which pertains to establishing a scientific panel of independent experts in artificial intelligence. As significant users of data and artificial intelligence, the actuarial profession is closely monitoring and is determined to be an active contributor to the developments in this field.

We would like to provide comments on the following points:

- <u>Scope of the Scientific Panel's Mandate</u>: In the context of the AI Act, the Scientific Panel's primary role (cf. Article 68) is to support the Commission concerning general-purpose AI (GPAI) models. The current draft emphasises this focus, detailing how the Scientific Panel should issue alerts specifically for GPAI. We feel the draft could more comprehensively address topics beyond GPAI, as the current emphasis appears somewhat limited to GPAI concerns. The AI Act also mandates the Scientific Panel to address issues related to surveillance, cross-border surveillance, and activities outlined in Article 81.

- <u>Selection Criteria for Panel Experts</u>: Article 3, paragraph 3 of the draft specifies that experts should be chosen to ensure "multidisciplinary, adequate, and up-to-date scientific or technical expertise in AI, including expertise in applied sectors, fundamental rights, and equality, as appropriate." However, the AI Act itself more narrowly states that "the scientific panel shall consist of experts selected by the Commission on the basis of up-to-date scientific or technical expertise in AI." While the AI Act does not explicitly reference applied sectors, fundamental rights, or multidisciplinary criteria, we support this broader interpretation in the draft. We believe that fundamental rights and equality are important considerations and encourage the criteria to remain inclusive, even if it extends beyond the original language of the AI Act.

- <u>Mandate for Recommendations and Opinions</u>: Article 7 of the draft mentions "recommendations, opinions, or qualified alerts." While qualified alerts are well-defined in terms of process and review by the AI Office, the extent to which the Panel can independently issue recommendations or opinions remains unclear. Does the Panel have the authority to make recommendations or issue opinions without AI Office review? We would welcome further clarification on the Panel's mandate in this regard.

Thank you again for the opportunity to provide feedback on this important regulation. We look forward to continued engagement as the AI regulatory framework develops.