

AI Strategy,
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Dear Secretary General Quinn,

The American Chamber of Commerce Ireland greatly welcomes the development of a National Strategy on Artificial Intelligence ('the Strategy') for Ireland. Our members are at the forefront of developing and adopting Artificial Intelligence; and we welcome the creation of a Strategy that safely promotes the development of AI technologies by many indigenous and global companies in Ireland.

Considering the increasing global competition for investment, changing global trade policy and political uncertainty, the American Chamber believes that this Strategy should focus on the elements that Ireland can control to sustain competitiveness for inward investment. The Chamber views this Strategy in the context of our vision for Ireland to be 'an inclusive location-of-choice for talent and innovation with global impact'.

Artificial Intelligence is driving the digitalisation of our economy and is radically changing the way that every worker in Ireland goes about their daily lives. The Chamber would like to see a Strategy that continues to encourage the development of leading Artificial Intelligence tools aimed enhancing the lives of people living and working in Ireland by global and indigenous companies in Ireland.

The Chamber would like to see the following priorities reflected in the Strategy:

- ***Robust and well-resourced regulators***

Artificial Intelligence tools are only successful if the actions and decisions they make, or assist in making, are trusted by consumers and the general public. The Chamber is supportive of the guidelines set out in European Commission's "*Ethics Guidelines for Trustworthy AI*" and recommends that the Strategy reflects the seven key requirements listed in Chapter II of the Guidelines.

In particular, we believe the Strategy should be cognisant of the need for 'diversity, non-discrimination and fairness'. Population changes have taken place in Ireland over the past decade including strong growth in Ireland's overseas born population. These changes have globalised Ireland's economy and its workforce with members of up to 100 nationalities now present in some American Chamber member companies. Given that this transformation is relatively recent, the new Strategy should encourage insights from data analyses or deep learning-based activities should be primarily considered from the most recently available historic data.

Furthermore, the Chamber is of the view that it is essential to invest in the capabilities and reputation of the all competent authorities charged with the delivery of this Strategy to enable the recruitment of skilled and experienced staff with the capacity to deliver on their mandate. We would

like to reiterate our view for continued adequate funding for the Data Protection Commission and the new National Cyber Security Centre. We continue to encourage the NSAI to work with our members to integrate an understanding and development of standards and regulations for emerging technologies.

- *Enhancing Ireland's R&D capabilities in the field of Artificial Intelligence*

The Chamber believes that the Strategy is an opportunity to foster responsible and sustainable innovation in the field of Artificial Intelligence. In this regard we strongly welcome the creation of the SFI Centre for Research Training in Artificial Intelligence and the role that it will play the training of postgraduate students and the up-skilling of industry-based staff in key technical topics in artificial intelligence.

As the Chamber has put forward in our recent response to the 2019 Review of the R&D Tax Credit Regime¹, the location of an R&D activity has a significant impact on long term economic growth potential of a jurisdiction by anchoring related manufacturing and service activities and driving enhanced skill levels. We welcome the continuation of the R&D tax credit regime in the recent budget. In addition, we suggest that the new Strategy should consider the evolution of the R&D tax credit regime, while remaining based on the OECD Frascati model, to expand the qualifying fields of science to emerging areas of AI in to ensure that the regime remains in line with our ambitions to become a leading developer, adopter and implementation of Artificial Intelligence.

- *Investing in the necessary upskilling of the workforce*

The ongoing adoption of Artificial Intelligence requires the upskilling of significant sectors of the economy; for both C suite and non-C suite employees. The Chamber is very supportive of the commitment to upskilling, lifelong learning and the designation of Artificial Intelligence as a priority area within the Government's Future Jobs Strategy. We suggest that the National AI Strategy is created in tandem with the Future Jobs Strategy and that any review of either Strategy is considered holistically. We recognise that lifelong learning is a joint enterprise between government and business; and our member companies are committed to investing in the training and development needs of their employees.

We are supportive of the SFI Centre for Research Training in Artificial Intelligence's objective to create an "internationally connected and globally recognised centre of excellence for the training of postgraduate students and the up-skilling of industry-based staff in key technical topics in artificial intelligence²". However, we recognise that significant leap that will have to be made by many businesses in the next few years. In order to meet this demand, the Chamber suggests the creation of a catalogue of training centres, similar to the model developed by NIBRT, by the SFI Centre or another organisation which would host and champion knowledge development and best practice.

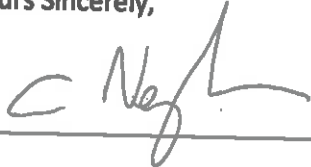
¹ <https://www.amcham.ie/getattachment/09c3aaf7-8f50-453a-9eb8-7bde45feef66/R-D-Tax-Credit-Review.pdf.aspx?ext=.pdf>

² <http://crt-ai.cs.ucc.ie/index.html>

- *Consultative approach to developing AI Strategy*

The Chamber welcomes the opportunity to input into this Strategy. We echo the European Commission's statement that "in order to develop AI systems that are trustworthy it is advisable to consult stakeholders who may directly or indirectly be affected by the system throughout its life cycle³". Going forward we would encourage the Strategy to include scenario-based approach to reviews of the Strategy to account for the cutting-edge nature of this sector

Yours Sincerely,



Conor Neylan

Acting Head of Advocacy and Communications

³ <https://ec.europa.eu/digital-single-market/en/news/ethics-guidelines-trustworthy-ai>

