

15 November 2024

Feedback of

ACT | The App Association
(Transparency Reg. # 72029513877-54)
Rue Belliard 40,
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to the

European Commission

regarding its

Consultation on implementing regulation
establishing a scientific panel of independent
experts

Introduction and statement of interest

ACT | The App Association (hereafter ‘App Association’) welcomes the opportunity to submit comments to the European Commission consultation on its implementing regulation establishing a scientific panel of independent experts.

The App Association is a policy trade association for the **small business technology developer community**. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology. Today, the ecosystem the App Association represents—which we call the app economy—is valued at approximately €86 billion and is responsible for over 1.3 million jobs in the European Union (EU).¹

Position on the European Commission’s implementing regulation establishing a scientific panel of independent experts

In response to the consultation on the Scientific Panel under the AI Act Regulation, we appreciate the focus on maintaining high selection criteria for the composition of the scientific panel, as described in Article 3 of the Implementing Regulation. Moreover, we applaud the focus on maintaining diversity across different factors, particularly ensuring ‘multidisciplinary adequate and up-to-date scientific or technical expertise in the field of artificial intelligence, including expertise pertaining to applied sectors, fundamental rights and equality, as appropriate’. However, it is important to make clear and clarify that the panel would consist of a variety of multidisciplinary specialists, ensuring representatives from various industry levels, concretely small and medium-sized entities (SMEs). Given that small businesses face specific challenges in navigating AI compliance, having experts who understand the operational and resource constraints of SMEs will help the panel have a more balanced perspective. We believe it is key for experts from all market sectors and levels to be represented in order to reflect the actual market reality. Clarifying this in Article 3 would give more legal certainty and clarity to the current Draft.

¹ See <https://actonline.org/wp-content/uploads/Deloitte-The-App-Economy-in-the-EU-2020.pdf>.

The App Association remains at your disposal to provide further input and would welcome the opportunity to contribute to developing practices and solutions that address AI issues in ways that benefit all market participants, especially innovative SMEs.

Sincerely,



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