



Brussels, 02 December 2021

## CoESS-EOS-Euralarm Joint Declaration

**On behalf of the European Security Industry, CoESS, EOS and Euralarm express their serious concerns about the present proposal for a European Artificial Intelligence Act.**

- Artificial Intelligence (AI) is a groundbreaking technological development and needs an equally ambitious legal framework at EU level.
- CoESS, EOS and Euralarm believe that regulations should be balanced and proportionate to avoid constraining or hindering technological development or rendering too high the cost of placing AI solutions on the market.
- The integration of AI in security solutions could potentially allow for a significant increase in performance, which may translate in a better protection of European citizens, critical infrastructures and the economy at large against public security threats, including hybrid threats.
- To achieve this result, the solutions should be evaluated, abiding by the principle of technological neutrality, aiming for the best and most reliable performance, whether it be reached by AI, humans or a combination of these two.
- CoESS, EOS and Euralarm note that the present proposal does not reflect the importance that AI may have in the future in public security, nor considers the already existing implementations, and introduces:
  - o *very restrictive provisions in Article 5 and in the definition of “publicly accessible places”;*
  - o *concerns over the possible misuse of technological solutions, such as Automated Facial Recognition, by law enforcement instead of focusing on the right approach to adopt them while protecting citizens’ data and privacy.*
- The introduced provisions are highly restrictive and create legal uncertainties for both developers and users in the security domain. The proposal entails a real risk of having Europe lagging behind on the development of viable solutions in different security domains, thereby exposing European citizens to greater security threats (also by those willing to use AI in a harmful way), rather than fostering the provision of advanced tools to allow lawful entities and agencies to better protect citizens.

**CoESS** is recognised by the European Commission as the European representative of the private security services – a labour-intensive sector with 45.000 companies and 2 million security officers. CoESS is actively engaged in EU Sectoral Social Dialogue and member of diverse EU Expert Groups, such as the EU Operators Forum for the Protection of Public Spaces. ([www.coess.eu](http://www.coess.eu))

**EOS** represents the voice of the European security industry and research community providing research, solutions and services across many security domains including borders, cyber, transport, hybrid threats and crisis management. ([www.eos-eu.com](http://www.eos-eu.com))

**Euralarm** represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our Members make society safer and more secure through systems and services for fire detection, extinguishing systems, security systems and alarm receiving centers. ([www.euralarm.org](http://www.euralarm.org))