



**Homo  
Digitalis**

Παράλου 12 & Αχινιάδων 17-19

118 54, Αθήνα | [info@homodigitalis.gr](mailto:info@homodigitalis.gr)

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## Submission of Homo Digitalis' input - Chapter 8 of the draft feasibility study

[Homo Digitalis](#) is a Greek civil society organisation based in Athens that focuses on the promotion and protection of human rights in the digital age. Moreover, we serve as a member organisation at the [European Digital Rights \(EDRi\)](#) network. Please, find below our comments and suggestions on chapter 8 of the draft feasibility study. We would like also to state that we officially endorse the related submissions of the Conference INGOs and Access Now.

### Comments & Suggestions

Homo Digitalis endorses the views suggested by Alessandro Mantelero in the final report he prepared on the analysis of the International legally binding instruments. Thus, options ii. "Convention" and iii. "Framework Convention", appear to be the most prominent solutions. However, Homo Digitalis is mostly in favor of option ii. "Convention". Council of Europe has a strong tradition of being a pioneer organization that introduces legal frameworks seeking to address unprecedented challenges, harmonizing in this way national laws, improving supervision mechanisms, and increasing cooperation and synergy among different countries. The use of AI creates challenges and opportunities that know no borders and have an international character.

Therefore, harmonization of rules and obligations across states on AI deployment, as well as a clear agreement regarding AI research and development procedures is crucial for the way forward. Successful examples of such innovative legal frameworks of the past are the Convention 108, the Budapest Convention, the Istanbul Convention and the Convention on Human Rights and Biomedicine. Homo Digitalis calls the members of this sub-group to reflect upon the importance of all of these above mentioned conventions and the strong role that they have played over their years of existence in bettering national legal frameworks across the globe. These CoE Conventions have been safeguarding human rights and freedoms by providing clear state's obligations, supervision mechanisms and remedial routes in case of violations. We need to be ready to take a similar approach with AI development and deployment, paving the way for detailed and clear national frameworks on this matter in the near future.

Nevertheless, we understand that option iii. "Framework Convention", might be a more flexible and agreeable option between Member States of the CoE. However, Homo Digitalis is unaware if such an approach was successful in the past and we would appreciate the

guidance of CoE on this matter (examples such as the CoE's Framework Convention for the Protection of National Minorities or the Faro Convention). In any case, no matter what instrument will be selected, this should not be technology dependent, but instead broad enough to encompass future developments. So far, CoE Conventions have been successfully broad enough to stand the test of time.

*\*For more information about this submission please contact Eleftherios Chelioudakis at e[dot]chelioudakis[at]homodigitalis[dot]gr*