

CECE's Position

- **The Risk Assessment covers all technology-associated risks in all phases of the lifecycle**
 - Machine Learning - the limits of „narrow Artificial Intelligence“
 - Legislating Machine Learning – a risk-based approach is more appropriate
 - Autonomy - different levels of sophistication of the technology
 - Depending on the level of autonomy, the risks can be covered by a combination of increased functional safety or organizational measures
- **Cybersecurity - security and safety need to be considered separately**
 - Cybersecurity needs to be addressed in horizontal legislations to cover the real need - addressing it at a product level is only one small piece of the puzzle
 - Adding requirements in any vertical legislation could lead to fragmentation and/or contradiction!
- **The technological neutrality of the Machinery Directive is a core value**
 - Technology specific legislation tends to be overly prescriptive, hampering innovation, particularly for the wide range of applications of the Machinery Directive
 - Per New Legislative Approach, state-of-the-art technology-specific requirements belong into Harmonized Standards developed by Standardization Bodies
 - Amending Annex IV (particularly on machine learning) may lead to disproportionate requirements considering the actual application of AI in the industry