

Submission of
The Center for AI and Digital Policy (CAIDP)
to the
**Agency for Development of Electronic Government and
Information Society (AGESIC) of the Oriental Republic of Uruguay**
in response to
Public Consultation on the National Artificial Intelligence Strategy 2024 - 2030

The Center for AI and Digital Policy (CAIDP) appreciates the opportunity to provide comments to the Uruguay Artificial Intelligence (AI) Strategy 2024 - 2030 Public Consultation.¹ We commend Uruguay's efforts in developing a forward-looking AI strategy that aligns with international and regional frameworks on ethical AI, including the UNESCO Recommendation on the Ethics of AI that Uruguay had endorsed in 2021², and the recently adopted Declaration of Montevideo For the construction of a regional approach on the governance of AI and its impacts on our society.³

About CAIDP

The Center for AI and Digital Policy (CAIDP) is a global, independent, non-profit research organization headquartered in Washington, D.C. CAIDP's mission is to promote a more just society by ensuring that technology advances uphold human rights, democratic governance, and the rule of law. CAIDP offers expert guidance on AI policy to a variety of international organizations, including UNESCO, the OECD, the G20, the European Parliament, and others. Additionally, CAIDP publishes the annual Artificial Intelligence and Democratic Values (AIDV) Report, which provides a comprehensive evaluation of global AI policies and practices, using a standardized methodology and twelve specific metrics to assess alignment with democratic principles.⁴ The most recent edition of the AIDV Report (2023) highlighted that Uruguay did not yet have a general national AI development strategy, but rather has an AI development strategy for the digital government, officially called Artificial Intelligence Strategy for Digital Government (AISDG) 2020.⁵ CAIDP notes Uruguay's efforts towards formulating a general AI strategy with the draft National AI Strategy 2024 – 2030 that is open for public consultation.⁶

CAIDP Comments on Draft Uruguay AI Strategy's Alignment with Regional and International Ethical AI Frameworks

¹ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

² UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

³ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

⁴ CAIDP, Artificial Intelligence and Democratic Values Index (2023), www.caidp.org/reports/aidv-2023/

⁵ CAIDP, Artificial Intelligence and Democratic Values Index (2023), www.caidp.org/reports/aidv-2023/

⁶ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

CAIDP notes that the draft Uruguay AI Strategy demonstrates alignment with regional and international ethical AI frameworks. The Uruguay AI Strategy embodies key elements of the Montevideo Declaration, particularly its focus on human rights, transparency, and multi-stakeholder governance.⁷ Specifically, the Uruguay AI Strategy's emphasis on human rights (as seen in its principles of respect for human dignity and non-discrimination, detailed in Section 'Guiding Principles')⁸ aligns with the Montevideo Declaration's call for AI development that respects and promotes fundamental freedoms and human rights.⁹ The draft Uruguay AI Strategy also incorporates transparency and accountability mechanisms, such as the establishment of the AI Observatory (detailed in Section 'Axis 1: Governance'), which includes monitoring AI initiatives, evaluating their societal impact, and ensuring compliance with ethical standards.¹⁰ The proposed AI Observatory will include representatives from government bodies, academia, civil society organizations, and the private sector, ensuring a comprehensive multi-stakeholder approach (as detailed in Section 'Axis 1: Governance')¹¹, which aligns with the Montevideo Declaration's emphasis on regional AI governance that includes multiple stakeholders and ensures transparency.¹²

The draft Uruguay AI Strategy also reflects the principles of sustainable technological development and inclusivity, as emphasized in the Montevideo Declaration. For example, Axis 3 of the draft Uruguay AI Strategy, which focuses on sustainable development and the sectors of the national economy¹³, directly supports the Montevideo Declaration's goals of ensuring that AI promotes economic development in a sustainable and inclusive manner.¹⁴

Furthermore, the guiding principles articulated in the draft Uruguay AI Strategy (detailed in Section 'Guiding Principles')¹⁵ are consistent with the UNESCO Recommendation on the Ethics of AI, including

⁷ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

⁸ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

⁹ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

¹⁰ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

¹¹ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

¹² Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

¹³ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

¹⁴ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

¹⁵ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

respect for human dignity, equitable access, and the importance of education and training for AI capabilities. The draft Uruguay AI Strategy's guiding principles, such as those focusing on equity, non-discrimination, and strengthening democracy, directly align with the UNESCO Recommendation's emphasis on protecting human rights and fostering inclusiveness (as detailed in Section 'Values and Principles', and 'Policy Area 1: Ethical Impact Assessment').¹⁶ Additionally, the Strategy's emphasis on talent management and AI education initiatives (as detailed in Section 'Axis 2: AI Capabilities')¹⁷ aligns with the UNESCO Recommendation's focus on the importance of education and research to empower societies in the AI era (as detailed in Section 'Policy Area 8: Education and Research').¹⁸

CAIDP Recommendations

CAIDP commends Uruguay for taking steps to ensure that AI technologies contribute to well-being while mitigating risks to human rights and democracy, including the explicit incorporation of mechanisms for monitoring and review, which support both the Montevideo Declaration and UNESCO's recommendations for ongoing ethical AI governance. CAIDP proposes several recommendations that would strengthen the draft Uruguay AI strategy through stronger alignment with the Montevideo Declaration and the UNESCO Recommendation on the Ethics of AI, which have both been endorsed by Uruguay.

1. Adoption of a stronger human rights based approach

We recommend the adoption of a stronger human rights-based approach to guide the development and deployment of AI in Uruguay. This approach should explicitly integrate safeguards that protect vulnerable communities and uphold fundamental rights, which aligns with both the Montevideo Declaration and the UNESCO Recommendation. For example, requirements for ethical impact assessments (as emphasized in Section 'Ethical Impact Assessment' of the UNESCO Recommendation)¹⁹ and consultations with affected communities (as highlighted in the Montevideo Declaration)²⁰ could further enhance the Strategy's alignment with international best practices already endorsed by Uruguay.

2. Enhance Explicit Transparency and Accountability Measures

The draft Uruguay AI Strategy outlines commitments to transparency and explainability, which is commendable. CAIDP suggests incorporating mandatory periodic third-party audits for AI systems, particularly those used in public services. Independent audits would help ensure compliance with ethical guidelines and bolster public trust in AI technologies. This recommendation strengthens the Uruguay AI Strategy's commitment to transparency and

¹⁶ UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

¹⁷ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

¹⁸ UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

¹⁹ UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

²⁰ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

explainability by adding an external layer of verification that ensures accountability. Periodic third-party audits would provide an objective assessment of AI systems, complementing the draft Uruguay AI Strategy's existing mechanisms such as the AI Observatory, and ensuring that transparency is maintained throughout the entire lifecycle of AI technologies (as detailed in Section 'Policy Area 2: Ethical Governance and Stewardship' of the UNESCO Recommendation).²¹

3. Require Mandatory Ethical Impact Assessments

CAIDP proposes that the draft Uruguay AI Strategy include a requirement for mandatory ethical impact assessments before the deployment of high-risk AI applications. Such assessments should cover potential impacts on human rights, privacy, and environmental sustainability. This recommendation supports proactive risk management and aligns with UNESCO's emphasis on ethical governance throughout the AI lifecycle (as detailed in Section 'Policy Area 2: Ethical Governance and Stewardship', of the UNESCO Recommendation).²²

4. Prohibit High-Risk Applications

CAIDP urges Uruguay to include in the draft AI Strategy explicit prohibitions of certain high-risk AI applications that infringe on fundamental rights, such as mass surveillance and discriminatory profiling. This step would affirm Uruguay's commitment to the ethical use of AI and prevent misuse that could harm marginalized groups, in line with the principles outlined in both the Montevideo Declaration²³ and UNESCO Recommendation (Section 'Values and Principles').²⁴

5. Continuous Inclusive Multi-Stakeholder Engagement

CAIDP recommends that the draft Uruguay AI Strategy establish formal mechanisms for continuous engagement with civil society, academia, and the private sector to ensure diverse perspectives are integrated throughout the policy implementation process. This recommendation builds on and strengthens the AI Observatory proposal in the draft Uruguay AI Strategy by promoting a more structured and continuous form of engagement beyond the initial setup. The AI Observatory, as proposed in the draft Uruguay AI Strategy (Section 'Axis 1: Governance')²⁵, already includes representatives from key stakeholder groups. CAIDP's recommendation aims to ensure that these representatives not only participate but are also actively involved in ongoing decision-making and monitoring processes to adapt to emerging challenges and opportunities in AI governance. This ongoing dialogue is essential to reflect the evolving nature of AI technologies and the ethical considerations they entail.

The Center for AI and Digital Policy (CAIDP) extends its appreciation to the Agency for Development of Electronic Government and Information Society (AGESIC) of the Oriental Republic of Uruguay for considering our comments and recommendations regarding the Draft Uruguay National Artificial

²¹ UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

²² UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

²³ Uruguay Presidencia, Declaración de Montevideo destaca el avance de Uruguay en el uso de inteligencia artificial (2024), <https://www.gub.uy/presidencia/comunicacion/noticias/declaracion-montevideo-destaca-avance-uruguay-uso-inteligencia-artificial>

²⁴ UNESCO, UNESCO Recommendation on the Ethics of AI (2021), <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

²⁵ AGESIC, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, Consulta Pública de la Estrategia Nacional de Inteligencia Artificial, <https://plataformaparticipacionciudadana.gub.uy/processes/consulta-publica-estrategia-ia/f/418/>

Intelligence Strategy 2024 - 2030. We welcome the opportunity for continued engagement and remain available to address any further inquiries.

Sincerely,



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CAIDP Executive Director



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