



European Marine Board
Artificial Intelligence Policy

Version 2

Signed:

Date:

1. Preamble

Artificial intelligence (AI) is evolving very quickly, and although it can be advantageous it also entails some risks. The EU therefore instituted an AI Act in 2024 - EU Regulation 2024/1689¹ - to ensure the proper functioning of the internal market and prevent market fragmentation; to stimulate and support innovation; and to protect citizens and companies against the harmful effects of AI systems on fundamental rights such as democracy, the rule of law and the environment.

The EU AI Act sets out to address the risks that are created by the use of AI applications, and provides AI developers (providers) and users (deployers) with an understanding of the requirements and their obligations regarding the use of AI. The Act classifies AI according to its risk: unacceptable risk systems which are prohibited; high-risk systems with strict requirements; and 'transparency bound' systems, which henceforth will be referred to as limited risk AI systems. The rules of the AI Act are proportionate to the risk, and most of the AI Act focuses on high-risk AI systems. AI systems with minimum risk are not covered by the AI Act, and will henceforth be referred to as minimal risk systems.

The **prohibited** AI systems are listed in Article 5 of the Act and include AI systems that: use subliminal techniques to manipulate people; exploit the vulnerability of people; allow for 'social scoring'; and that predict the likelihood of a person committing a crime.

High-risk AI systems are listed in Annex III of the AI Act and cover the following categories: biometrics (e.g. remote biometric identification); critical infrastructure (e.g. AI systems intended to be used as safety components in road traffic or the supply of water, gas or electricity); education (e.g. AI tools that grade student exams or determines admission to university programs); employment and worker management (e.g. AI systems that automatically filter job applications); access to essential services and benefits (e.g. AI systems that decide whether someone can get a loan); law enforcement (e.g. AI systems used during court cases); migration, asylum and border control (e.g. AI systems that assist in the examination of asylum applications); and administration of justice and democratic processes (e.g. AI systems that help judges interpret or apply law). The rules and regulations for high-risk AI systems are covered in Art. 6-49 of the Act, and include the obligation to have: risk management systems; data governance and quality; technical documentation; record-keeping and logging; transparency and information for users; human oversight; accuracy, robustness and cybersecurity; conformity assessment; and post-market monitoring and incident reporting. While most of these rules apply to the providers of these systems, the users also have to adhere to some of these obligations. The European Commission is preparing a database on high-risk AI systems.

The transparency obligations for **limited risk** AI systems are covered in Art. 50. Limited risk systems include General-Purpose AI systems (such as ChatGPT) that generate synthetic audio, image, video or text that can constitute 'deep fakes'. Providers of such AI systems have to ensure that the outputs of the AI system are marked in a machine-readable format and detectable as artificially generated or manipulated, while users of these systems have to make clear that the content has been artificially generated or manipulated.

¹ <https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>

Minimal risk AI systems include the majority of AI applications currently on the market, such as AI enabled videos games and spam filters. While these systems face no obligations under the AI Act, companies can create voluntary codes of conduct.

The AI Act requires providers and users of AI systems to have a sufficient level of AI literacy, which should be proportionate to the AI systems being used (Art. 4). This AI literacy should equip providers, users and all affected persons with the necessary notions to make informed decisions regarding the AI training (Recital 20 of the AI Act).

The AI Regulation came into effect on 1 August 2024, and it will apply from 2 August 2026. However, some parts were already applicable from 2 February 2025, such as the banning of certain AI systems and AI literacy requirements. In addition, Belgium also requires that all employers must establish an internal AI Policy.

| Date | Version | Comments |
|-------------|---------|---|
| March 2025 | 1 | First EMB AI Policy created by EMB Secretariat |
| August 2025 | 2 | Revised EMB AI Policy with more detailed information on the EU AI Act and additional codes of conduct for activities under EMB, which might involve the use of AI |

2. EMB AI policy

As a result of the EU AI Act, EMB is required to establish an AI Policy under Belgian law. The EMB AI Policy establishes clear guidelines for AI use in EMB activities, including codes of conduct and transparency requirements. The AI Policy also indicates how employees will obtain sufficient AI literacy. It is divided into two sections, covering aspects relating to EMB employees and those relating to external parties engaged in EMB activities.

3. AI policy for EMB employees

3.1 AI literacy

As of 2 February 2025, employers (both AI providers and AI users) must ensure that their employees are AI literate. AI literacy is about the skills, knowledge and understanding that everyone in the organisation involved with AI systems needs to: a) be able to deploy AI systems in an informed manner; and b) be aware of the opportunities and risks of AI and the possible damage it can cause. Everyone in the organisation needs to have the knowledge and skills to make informed decisions and recognise potential risks and harm.

The AI Act does not prescribe how organisations should ensure that all those involved have sufficient AI knowledge, only that the level of AI literacy must be 'adequate', and not everyone requires the same level of AI knowledge. IT professionals developing an AI system need insight into the correct application of technical elements during the development phase of the system, but for others (such

as the EMB Secretariat) it might be enough to: a) understand what one should do to be compliant while using AI; and b) how to interpret the output of the AI system. However, anyone who comes into contact with AI must understand how decisions made using AI affect them.

The EMB must therefore decide which knowledge and skills are needed and how their employees should obtain that knowledge. An initial assessment was made, and the EMB Secretariat staff undertook a tailored AI training in April 2025. This training included: what is AI; bias and ethics; safety and risks; comparison of AI models; applications; framework for strong prompting; and use cases. The needs for further AI training will be reviewed as needed. The EMB Secretariat will also ensure that new employees have the necessary AI literacy.

3.2 Use of AI applications

At present the EMB Secretariat uses only limited- and/or minimal risk AI systems. Limited risk AI systems used by the EMB Secretariat include General Purpose AI Models, such as ChatGPT or Mistral, while minimal risk AI systems include Adobe, DeepL, Scite and Grammarly.

Under the transparency obligation of Article 50, EMB has to ensure that synthetic generated audio, image, video or text is clearly marked as such. EMB undertakes to adhere to these guidelines and to provide disclaimers to indicate wherever AI applications have been used within its activities, and for which purpose.

The EMB Secretariat will not use any prohibited or high-risk AI systems, including the ones listed in the category of employment and worker management. These include AI systems used to automatically filter job applications, and systems used to make decisions about hiring, firing, promotions, task assignments, or monitoring and evaluating workers' performance and behaviour.

The EMB Secretariat also undertakes not to use any AI applications which support note- or minute-taking, or summary creation, during or after online meetings or events, which do not comply with the General Data Protection Regulation (GDPR). The European Commission will publish specific guidance on the interplay between AI and GDPR, and EMB will adhere to that guidance once published.

Going forward, EMB will continue to ensure that it complies with the AI Act.

3.3 Dedicated resources

The EMB Executive Director will ensure that appropriate staff time and other resources are dedicated to training and compliance for the new AI Act. The Executive Director has appointed Dr. Ana Rodriguez Perez as EMB AI Officer to oversee the training and compliance requirements as outlined above.

4. AI policy for EMB activities

4.1 AI literacy for external parties

All organisations and individuals based within the EU will also be subject to the requirements of the EU AI Act, although there may be variations between organisations in terms of their AI policies.

The EMB will encourage its Member organisations to offer AI literacy training to their employees, and to develop their own AI Policies. EMB has made its AI Policy available [online](#) as a reference document².

EMB will also investigate how it can best promote AI literacy to external parties with whom it directly interacts, i.e. Working Group members and EMB Young Ambassadors. This may be in the form of guidance information or by directing external parties to relevant training offers, depending on feasibility and the requirements of those individuals. These needs may also vary depending on whether those individuals are based within or outside the EU, and therefore whether or not they are subject to the EU AI Act.

4.2 Use of AI applications

General guidance on the use of AI applications in EMB activities:

- Approach the use of AI applications with caution;
- Retain human oversight and fact check outputs;
- Do not enter personal, sensitive or confidential information into an AI platform;
- Always inform co-workers if AI applications have been used to assist with developing an output, and the name of the AI application used so that others can help evaluate and minimise risks or biases; and
- Always acknowledge when AI applications have been used to produce content.

4.2.1 EMB Working Groups

The EMB Secretariat will give an overview of the AI Act and its requirements at the kick off meeting of each Working Group. Written guidance will also be developed and given to Working Group members.

The EMB Secretariat will ask all Working Group members to disclose any text they have written where they have used AI, and which applications have been used. While EMB Working Groups can use generative AI in the process of drafting, this technology should only be used to improve the readability and language of the text. Replacement of key writing tasks such as producing scientific insights, creating a literature review, drawing scientific conclusions or providing recommendations by AI will not be accepted. If the Working Groups use this technology for improving the readability and language of text, it should only be done with human oversight and control, and all work should be reviewed and edited carefully. In addition, the EMB Secretariat will use AI text checking software (e.g. Quillbot, Grammarly) to scan all EMB draft documents to see how likely it is to have been generated using AI. If suspected AI generated text is found, the Secretariat will ask the authors to verify those statements with original sources e.g. academic literature/grey literature/policy documents.

Any use of AI and AI-assisted technologies has to be disclosed to the EMB Officer in charge of the Working Group, and will be clearly noted as a disclaimer in the publication together with the name of the AI system(s) used. The final decision on whether the text generated with the use of AI and AI-assisted technology is appropriate will be determined by the Chairs, with final approval of the EMB Secretariat.

² <https://www.marineboard.eu/european-marine-board-ai-policy>

The EMB Secretariat will also ask all Working Group members to be transparent about the use of any images etc. which have been generated using AI applications and used in EMB publications, and will indicate those clearly within the publication.

4.2.2 EMB Young Ambassadors

The EMB Secretariat will give an overview of the AI Act and its requirements at the annual Ambassadors Training Workshop, and the training slides will be made available to the Ambassadors for future reference. The EMB Secretariat will ask the EMB Young Ambassadors to comply with the same transparency requirements outlined in Section 4 in outputs produced for EMB or the EMB ECOP Network.

4.2.3 EMB Events and other meetings

The EMB Secretariat will ask all speakers and event organisers to be transparent about the use of any information, videos or images etc. which have been generated using AI applications within their presentations.

4.2.4 External projects

The EMB Secretariat undertakes to not take part in any project that would use or develop banned AI systems.

5. Useful links and resources

The EU AI Act: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689>

AI Act Explorer: <https://artificialintelligenceact.eu/ai-act-explorer/>

AI Act Compliance checker: <https://artificialintelligenceact.eu/assessment/eu-ai-act-compliance-checker/>

General details from KPMG on the AI Act: <https://kpmg.com/be/en/home/insights/2024/12/txl-the-ai-act.html>