

Artificial Intelligence Policy for ICOS RI

Approved by the ICOS General Assembly on 19 May 2026
ICOS/GA26/22

ICOS

Integrated
Carbon
Observation
System

Contents

Introduction.....	2
Principles of using AI	2
Regulatory compliance	3
Managing AI issues.....	3
Review of the policy.....	3
Relevant EU legislation and guidelines:	4

Introduction

Following European Union’s Artificial Intelligence (AI) Act, this document defines an AI system as any machine-based system that operates in whole or in part using artificial intelligence. Here, artificial intelligence (AI) refers to engineered or machine-based capabilities that, for a given set of implicit or explicit objectives, infer from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that influence real or virtual environments. AI systems may operate with varying levels of autonomy and can exhibit adaptiveness after deployment. Machine Learning (ML) is a subset of AI that focuses on training algorithms to learn from data to make predictions or decisions without being explicitly programmed for every rule.

The objectives of using and developing AI systems within ICOS include, but may not be limited to, fostering and enhancing scientific work and innovation, as well as helping and expediting the administrative work of ICOS ERIC and the wider RI in managing ICOS as a distributed infrastructure.

This policy describes the common principles to be applied within ICOS activities when using or developing AI tools. They are to be recognised and followed by all persons associated with ICOS and should be supported by all participating institutions. This policy does not exclude other guidelines or rules (e.g., related to professional and scientific responsibility, governance, social and environmental responsibility and compliance with the law) that may be raised by the ICOS ERIC or its contractual ICOS partners.

This policy is complemented by other ICOS policies like ICOS data policy that may be connected to AI issues.

This document builds on the ACTRIS ERIC AI policy.

Principles of using AI

- Non-public information and AI systems: non-public, confidential or private information must not be shared with externally hosted AI services.
- Any use of AI should always be overseen by humans. The employees within ICOS must define the intended scope, acceptable risk thresholds, and permitted conditions of use in advance. Outputs must be reviewed for reliability and validity, and alignment with these predefined parameters.
- Care should be taken that the use of AI systems shall not endanger human life, health, property rights, privacy, integrity or the environment. Special attention should be paid to processing storage and transfer sensitive data or anything under copyright. The user should be aware of ethical risks such as algorithmic bias.

- In line with ICOS's commitment to transparency, the use of AI should be clearly disclosed and communicated, where it materially affects outputs or decisions. In addition, any AI-driven models used in research should be transparently documented, and their results should be appropriately verifiable. AI systems should be suitable and implemented to support the objectives of ICOS.
- Sustainability is one of ICOS Core values. There should always be a well-founded reason to use AI, especially for videos or images, given its high energy consumption. Environmental effects of using AI should be systematically evaluated and considered in decision making.
- All relevant professional, technical, and ethical standards in the research field of ICOS should be considered when using or developing AI systems.
- When AI system tools are developed, the systems should be designed and documented to answer how and why a decision was made.
- When choosing AI tools, organisations should explore possibilities to select systems that have been produced by European manufacturers.

Regulatory compliance

AI use and development in Europe is regulated by EU regulation on AI (Regulation (EU) 2024/1689) coming into force step by step. ICOS ERIC will monitor the development of the EU AI regulation and adapt this policy to be fully aligned with it.

In addition to the EU regulation, all relevant legislation shall also be considered, including but not limited to:

- Copyright legislation: content used in AI systems (like for example text, databases, images, audio, video) are often protected by copyright. Also, software used for developing AI systems may be protected and not necessarily available as open source.
- Data protection legislation: all personal data must be processed in accordance with the EU General Data Protection Regulation (GDPR) and with the organisations data protection policies to ensure the privacy and security of individuals.

Managing AI issues

Each organisation within ICOS should take care that employees have access to appropriate training on the use and development of AI systems. Practical guidelines – either from the host organization or specific for the ICOS facility – should be made available for the staff.

Each organisation within ICOS should evaluate the benefits, risks and costs of the AI systems it uses or develops actively and steadily. Related risks should be considered in risk plans.

Any risks and problems of using or developing AI systems should be reported to the Director General of ICOS ERIC, who, if necessary, can take issues to the Ethical Advisory Board or the ICOS ERIC General Assembly for further discussion.

Review of the policy

This policy shall be reviewed regularly to reflect developments in AI systems and legislation and updated as necessary. Any amendments shall be approved by the ICOS ERIC General Assembly.

Relevant EU legislation and guidelines:

EU Regulation on AI [Regulation - EU - 2024/1689 - EN - EUR-Lex](#)

EU GDPR Regulation [Regulation - 2016/679 - EN - gdpr - EUR-Lex](#)

Guidelines of AI system definition: <https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-ai-system-definition-facilitate-first-ai-acts-rules-application>