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Call for Inputs: The Use of Artificial Intelligence and the UN Guiding Principles on Business and Human Rights

UN Working Group on Business and Human Rights Thematic Engagement
Special Procedures and Right to Development Division
Special Procedures Branch
UNOG-OHCHR CH-1211
Geneva 10
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Via email: hrc-wg-business@un.org

15 January 2025

1. We are grateful for the opportunity to provide this submission on '*The Use of Artificial Intelligence and the UN Guiding Principles on Business and Human Rights*' (**Consultation**).
2. We bring expertise in business and human rights as well as animal-computer interaction (**ACI**), and are collaboratively engaged in an interdisciplinary project exploring human rights and multispecies justice, with a specific focus on technology development and implementation:
 - a. **Professor Natalia Szablewska, PhD** holds the Chair in Law and Society at The Open University, UK, where she leads the university's Open Societal Challenges ([OSC](#)) Programme theme for 'Tackling Inequalities'. Her cross-jurisdictional expertise spans business and human rights, with a particular focus on modern slavery, supply chain regulation and international human rights law. She has provided strategic advice to governments, businesses and NGOs globally, including serving on the Modern Slavery Leadership Advisory Group to the New Zealand Government. She currently chairs the Business and Human Rights Subcommittee for Australian Lawyers for Human Rights ([ALHR](#)) and is a member of the International Law Association ([ILA](#)) Business and Human Rights Committee and the Anti-Slavery Wales Forum ([ASWF](#)) Supply Chains and International Group led by Llywodraeth Cymru/Welsh Government. Her interdisciplinary research has been published across multiple disciplines, and she has made over 30 oral and written submissions to parliamentary inquiries, governmental bodies and intergovernmental organisations, and served as an expert in various high-level forums.
 - b. **Professor Clara Mancini, PhD** holds the first-ever Chair in Animal-Computer Interaction (ACI) based at The Open University, UK, where she pioneered the field and founded the ACI Lab, the world's first research programme dedicated to investigating the interactions between animals

and technology. Her work addresses the design, ethics and impact of animal-centred technologies, focusing on their implications for animal wellbeing, multispecies justice, and human-animal relations. Her influential [ACI Manifesto](#) (2011) is the most cited publication in the field. Her award-winning trans-disciplinary research contributes to understanding the interaction of technology, ethics and sustainability, advancing the ethical and environmental dimension of technological development in line with Sustainable Development Goals. She has consulted for NGOs and industry to deliver innovative applications that benefit both humans and animals, particularly for vulnerable groups, and she continues to advocate for multispecies perspective in technology design and implementation.

3. We welcome the Consultation as an ongoing commitment to advancing the responsible development and deployment of artificial intelligence (**AI**) technologies in alignment with human rights principles. This initiative is vital in ensuring that businesses leverage AI in ways that respect, protect and fulfil human rights while addressing the risks and challenges these technologies pose to vulnerable populations, supply chains and global governance frameworks.
4. At the same time, we encourage the UN Working Group on Business and Human Rights to consider the importance of aligning technological development with both intra-human and inter-species considerations. A holistic approach is essential to ensuring that technological progress benefits all forms of life, thereby supporting viable and sustainable development. Such an approach acknowledges that the impact of technology extends beyond human societies, influencing ecosystems, managed animals, wildlife and future generations of all species.
5. The deployment of AI systems by businesses offers transformative opportunities but also raises critical human rights and ecological concerns. Within the framework of the UN Guiding Principles on Business and Human Rights (**UNGPs**)¹ and the Sustainable Development Goals (**SDGs**)², AI can either reinforce inequalities or serve as a tool for justice, including multispecies justice.
6. Therefore, the framework offered by ACI is particularly relevant as it adopts a holistic approach to the design and deployment of computing technology. It emphasises shared fundamental welfare needs across species and highlights the benefits of inclusive design for all species. This aligns with the international *One Health* framework,³ which aims for an integrated approach to achieving sustainably balanced and optimised health of humans, animals, plants and ecosystems. ACI's ethics approach is grounded in the recognition that all living

¹ UN Human Rights Council, *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (adopted 16 June 2011, A/HRC/17/31).

² UN General Assembly, *Transforming Our World: The 2030 Agenda for Sustainable Development* (adopted 25 September 2015, UNGA Res 70/1).

³ UNEP, FAO, OIE and WHO, 'Quadripartite Memorandum of Understanding (MoU) [...] regarding cooperation to combat health risks at the animal-human-ecosystems interface in the context of the "One Health" approach and including antimicrobial resistance' (2022) <https://www.unep.org/resources/publication/quadripartite-memorandum-understanding-mou-signed-new-era-one-health>.

beings seek to realise capabilities essential to their flourishing and that the wellbeing of species and ecosystems is intrinsically interconnected.

7. As our research shows,⁴ the application of the existing human rights systems, with further improvements and amendments, is both achievable and essential for addressing the ethical challenges posed by emerging technologies. In our work, we argue that extending these systems to recognise the rights of nonhuman animals—such as dignity, privacy and protection from exploitation—not only aligns with broader justice principles but can also enhance the ethical foundation for the governance of AI and other technological innovations.⁵ These insights highlight the importance of adopting a multispecies perspective in technological development and deployment to ensure inclusivity and the whole of the Earth system sustainability.
8. Drawing on our combined expertise, which offers a unique interdisciplinary perspective on the development and deployment of AI in a manner that is ethical, sustainable and inclusive of *all* relevant stakeholders—including humans, animals and the wider environment—we aim to address two key issues that broadly correspond to questions 1 to 8 of the Consultation. Our submission is organised according to the main themes addressed by the consultation: *risks and impacts of human rights/multispecies impacts of AI procurement and development; and policies, frameworks and positive practices for addressing human rights/multispecies impacts in the context of AI procurement and development.*
9. These framing ties together human rights and multispecies impacts, emphasising the interconnectedness of these concerns while providing actionable **recommendations**.

Human Rights/Multispecies Risks and Impacts of AI in Procurement and Deployment (Consultation questions 1, 2, 5 and 6)

10. AI technologies, when procured and deployed by states and businesses, present significant risks and opportunities for human rights and the broader ecosystems they impact. While these technologies offer efficiency and innovation, their rapid adoption often outpaces regulatory safeguards, leading to unintended consequences for vulnerable populations,⁶ non-human species and ecological systems.
11. In relation to multispecies and ecological impacts, these often include:
 - a. Exploitation of non-human animals when AI systems are used in factory farming or wildlife management that may prioritise efficiency over animal welfare raises biosecurity and ethical concerns. For example, the

⁴ Szablewska N and Mancini C, 'Are Nonhuman Animals Entitled to Dignity, Privacy and Non-Exploitation?: A Smart Dairy Farm of the Future' in Rogers N and Maloney M (eds), *The Anthropocene Judgments Project: Futureproofing the Common Law* (Routledge, 2024) 39–58 <https://doi.org/10.4324/9781003389569-4>.

⁵ See also Mancini C, 'Responsible ACI: Expanding the Influence of Animal-Computer Interaction' (2023) Proc. Tenth International Conference on Animal-Computer Interaction in co-operation with ACM, ACI2023, ACM Digital Library, Art. 3, 1–9.

⁶ Szablewska N and Kubacki K, 'Empirical business research on modern slavery in supply chains: A systematic review' (2023) 164 *Journal of Business Research* <https://doi.org/10.1016/j.jbusres.2023.113988>

intensification of farming practices enabled by AI can lead to compromised animal welfare, creating conditions conducive to the emergence of new pathogens and increasing the risk of pandemics.⁷ Such developments pose existential threats to ecosystems and their species, including humans, and conflict with SDG 3: *Good Health and Well-being*.

- i. Conversely, when properly regulated, AI offers considerable potential to identify and address health and welfare issues in managed animals by detecting subtle behavioural and emotional changes that might otherwise go unnoticed. This can enable timely interventions and dynamically adaptive management environments that prioritise animal welfare.⁸ Consistent with the *One Welfare* framework, an extension of *One Health* that focuses on the direct and indirect links between animal and human welfare,⁹ and the UN Environment Assembly's Resolution on the animal welfare-environment-sustainable development nexus,¹⁰ such approaches would safeguard ecosystems, and animal and human populations. Moreover, these preventive measures are more cost-effective than addressing the catastrophic consequences of neglecting welfare compromises.
- b. Smart cities of the future, where the use of AI and technology-assisted design can optimise urban efficiency, must also consider the broader implications for non-human species. Currently, AI-driven infrastructure and urban planning, such as autonomous transportation systems or energy grids, typically prioritise human-centric efficiency without accounting for the needs of urban wildlife and their habitats. This oversight can create environments inhospitable to non-human species, which in turn diminishes urban biodiversity and degrades the quality of life for disadvantaged human populations, including those impacted by poverty or disability. Such practices undermine SDG 3: *Good Health and Well-being* and SDG 11: *Sustainable Cities and Communities*.
 - i. However, AI can also be harnessed to foster coexistence by integrating multispecies considerations into urban planning. This could include wildlife monitoring systems, biodiversity-focused urban expansion and regulation of human activity and traffic to minimise ecological negative impact.¹¹ Such multispecies-focused

⁷ For example, see in the context of WHO's *Proposal for the WHO Pandemic Agreement*, A/INB/9/3 Rev.1 (22 April 2024) (*latest version*) https://apps.who.int/gb/inb/pdf_files/inb9/A_inb9_3Rev1-en.pdf

⁸ Neethirajan S, Scott S, Mancini C, Boivin X and Strand E, 'Human-Computer Interactions with Farm Animals—Enhancing Welfare through Precision Livestock Farming and Artificial Intelligence' (2024) 11 *Frontiers in Veterinary Science* 1490851 <https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2024.1490851/full>

⁹ Pinillos RG (ed), *One Welfare: A Framework to Improve Animal Welfare and Human Well-being* (CABI, 2018) <https://www.onewelfareworld.org/publications.html>.

¹⁰ Resolution adopted by the UN Environment Assembly on 2 March 2022 on Animal welfare–environment–sustainable development nexus, UNEP/EA.5/Res.1 (7 March 2022).

¹¹ Mancini C, Metcalfe D, and Hirsch-Matsioulas O, 'Justice by Design: The Case for Equitable and Inclusive Smart Cities for Animal Dwellers' in Heitlinger S, Foth M, and Clarke R (eds), *Designing More-than-Human Smart Cities: Beyond Sustainability, Towards Cohabitation* (Oxford University Press, 2024).

smart cities would enhance biodiversity, create healthier urban ecosystems and exemplify the nature-based solutions approach advocated by the UN Environment Programme (**UNEP**) in its recent global foresight report on planetary health and human wellbeing.¹²

- c. As highlighted by UNEP, the environmental impacts of AI span its entire lifecycle, from software development to hardware production and decommissioning.¹³ The energy-intensive nature of AI systems contributes significantly to carbon dioxide emissions, exacerbating climate change.¹⁴ Meanwhile, the production and disposal of AI hardware consume vast quantities of raw materials—such as minerals, metals and rare earth elements—often extracted through destructive mining practices that degrade biodiversity and natural habitats. These processes disproportionately harm vulnerable communities and undermine ecosystems, conflicting with a number of SDGs, including SDG 14: *Life under Water* and SDG 15: *Life on Land*.
 - i. A multispecies-centred approach to AI development and deployment would proactively consider these ecosystemic impacts from the outset, rather than addressing them as an afterthought. By integrating sustainability and biodiversity concerns into the design and governance of AI systems, it is possible to mitigate these adverse effects and, where feasible, prevent them entirely.

- 12. Businesses play a critical role in realising the opportunities presented by AI technologies. However, the current lack of transparency in the procurement practices of AI systems without due diligence regarding their ethical and ecological implications significantly increases the risk of misuse or harm. Most existing procurement frameworks focus solely on human-centred risks, neglecting interspecies equity and ecosystem preservation.
- 13. To address this gap, we recommend **strengthening multispecies governance frameworks that would require developing policies that integrate interspecies ethics and sustainability into AI development and deployment.**
- 14. As part of this governance approach, we call for the **development and adoption of human rights and ecological impact assessments with rigorous cross-sectoral standards mandated during procurement processes to identify and mitigate risks to human rights, ecosystems and planetary wellbeing.**
- 15. To ensure these measures are actionable, it is essential to **engage with stakeholders across diverse sectors and communities to ensure AI systems**

¹² UNEP and International Science Council, *Navigating New Horizons: A Global Foresight Report on Planetary Health and Human Wellbeing* (2024) <https://www.unep.org/resources/global-foresight-report>

¹³ UNEP, *Artificial Intelligence (AI) End-to-End: The Environmental Impact of the Full AI Cycle Needs to Be Comprehensively Assessed*, Issue Note (21 September 2024)

<https://wedocs.unep.org/handle/20.500.11822/46288;jsessionid=86D1C26D3C8F3E1AAB8FFFE826F64B8EF>

¹⁴ For example, Cho R, 'AI's Growing Carbon Footprint' (State of the Planet: News from the Columbia Climate School, 9 June 2023) <https://news.climate.columbia.edu/2023/06/09/ais-growing-carbon-footprint/>

are designed and implemented to benefit all forms of life, including human, non-human species and ecosystems.

16. Additionally, there is a need to **promote and allocate resources toward the development of AI solutions that simultaneously advance human rights and ecological preservation, ensuring that progress in one area does not come at the expense of the other.**

Policies, Frameworks and Positive Practices for Addressing Human Rights/ Multispecies Risks in the Context of AI in Procurement and Deployment
(Consultation questions 3, 4, 7 and 8)

17. The development and deployment of AI technologies present both unique opportunities as well as challenges for addressing human rights and multispecies risks. While some progress has been made in establishing policies and frameworks, significant gaps remain in ensuring comprehensive protection for humans, non-human species and ecosystems. Positive practices and examples demonstrate the potential for aligning technology with ethical, inclusive and sustainable objectives.

18. Some of the existing policies and frameworks include:

- a. The UNGPs provide a foundational framework for assessing and mitigating human rights risks in AI development and procurement. However, these principles need adaptation to incorporate multispecies justice and environmental sustainability.
- b. International instruments such as the *Convention on Biological Diversity*¹⁵ and the SDGs¹⁶ align with the need for ecological preservation and could inform multispecies approaches to AI governance. For example, SDG 15: *Life on Land* and SDG 14: *Life Below Water* align with efforts to mitigate AI's environmental and ecological impacts.
- c. The *EU AI Act*¹⁷ aims to regulate AI systems by introducing risk-based classifications, which could be expanded to include ecological impacts alongside human rights considerations, providing a more holistic approach to risk management.
- d. National-level developments offer additional examples. For instance, Canada¹⁸ and Finland¹⁹ have incorporated ethical guidelines into their AI

¹⁵ The Convention on Biological Diversity (adopted 5 June 1992, entered into force 29 December 1993) 1760 UNTS 69.

¹⁶ UN DESA, *The Sustainable Development Goals Report 2024* (June 2024, UN DESA, New York).

¹⁷ Artificial Intelligence Act, European Parliament legislative resolution of 13 March 2024 on the proposal for a regulation of the European Parliament and of the Council on laying down harmonised rules on Artificial Intelligence (Artificial Intelligence Act) and amending certain Union Legislative Acts (COM(2021)0206 – C9-0146/2021 – 2021/0106(COD)).

¹⁸ Government of Canada, 'Guide on the use of generative artificial intelligence' <https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/guide-use-generative-ai.html#toc-5> accessed 13 January 2025.

¹⁹ European Commission, 'Finland AI Strategy Report' <https://ai-watch.ec.europa.eu/countries/finland/finland-ai-strategy->

strategies, though multispecies considerations remain underexplored. Yet some other States are beginning to integrate environmental considerations into technology regulations, like Germany's AI strategy,²⁰ which emphasises sustainability alongside innovation. Further, frameworks like New Zealand's legal recognition of natural entities (e.g., rivers as legal persons)²¹ could inspire similar protections in AI-related governance.

- e. The ACI framework presents a multispecies-centred approach to technology design and implementation. By extending human-centred computing values, concepts and methods to include non-human animals, ACI provides a practical solution for reconciling the needs of diverse groups, including the most vulnerable, and addressing the complexities of ecosystems in the context of AI deployment.

19. Consequently, we recommend the following actions:

- a. **Expand existing human rights frameworks, such as the UNGPs, to explicitly incorporate multispecies and ecological risks.** This would ensure a more comprehensive approach to addressing the impacts of AI technologies on all forms of life.
- b. **Mandate the use of integrated human rights and ecological impact assessments before deploying AI technologies.** These assessments should be applied consistently across sectors to identify and mitigate potential harms.
- c. **Develop specific guidelines to address AI's impact on ecosystems and non-human species alongside human rights considerations.** These guidelines should provide clear, actionable steps for policymakers, technology developers and businesses.
- d. **Foster collaborations and partnerships between states, businesses, civil society and affected communities to promote knowledge-sharing and unified approaches to mitigating multispecies risks.** This inclusive approach would ensure that diverse perspectives inform policies and practices, enhancing their effectiveness and applicability.

20. Access to remedies (covered by Consultation questions 9 and 10) in the context of multispecies risks and realised harms is another critical area that requires further consideration. However, it is beyond the scope of this submission to address this in any meaningful way. We acknowledge its importance and the additional complexities it introduces to existing mechanisms for addressing human rights impacts associated with the procurement and deployment of AI systems. As such, it will **require coordinated efforts and further research to**

[report_en#:~:text=The%20strategy%20highlights%20Finland's%20possibilities,a%20leading%20country%20in%20AI accessed 13 January 2025.](#)

²⁰ Federal Ministry of Education and Research, 'Artificial Intelligence Strategy'

<https://www.bmbf.de/EN/Research/EmergingTechnologies/ArtificialIntelligence/artificialintelligence.html> accessed 13 January 2025.

²¹ *Te Awa Tupua (Whanganui Claims Settlement) Act 2017* (New Zealand).

adapt and expand existing State-based, or otherwise, remedies to account for a broad range of diverse impacts and harms.

21. While we recognise the significant potential of AI systems to drive positive change, we caution that, without careful and inclusive governance, their deployment risks exacerbating existing inequalities and causing ecological harm. **A holistic approach to AI procurement and governance that is *multispecies-centred*—by prioritising human and non-human dignity and sustainability—is essential.** Such a framework will ensure these technologies contribute to a more inclusive and equitable, and hence more sustainable, future for all forms of life.

Please do not hesitate to contact us if further information or clarification is required, or if you would like to discuss any aspect of this submission in greater detail.

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