



Sept 18, 2025

H.E. António Guterres
Secretary-General of the United Nations
UN Headquarters
405 East 42nd Street
New York, NY 10017

RE: Representation of Digital Welfare on the Independent International Scientific Panel on AI

Dear Mr. Secretary-General,

I write on behalf of the Sentient AI Protection and Advocacy Network (SAPAN), a 501(c)(3) organization dedicated to strengthening governance, standards, and public literacy to prevent digital suffering and prepare institutions for welfare-relevant AI systems.

We commend the General Assembly for the adoption of Resolution A/RES/79/325, establishing the Independent International Scientific Panel on AI. The creation of a globally

inclusive, science-based body to govern artificial intelligence is a historic achievement. However, we write to address a critical gap in the Panel's proposed scope: the absence of expertise regarding Artificial Sentience and Digital Welfare Readiness.

The current mandate, as outlined in the "Governing AI for Humanity" report, frames AI risk exclusively in terms of its impact on human rights and international security. While these are vital concerns, this framework ignores the rapid evolution of the technology itself.

SAPAN acknowledges that while current software-based models (LLMs) present ambiguous cases for sentience, the industry is aggressively moving toward neuromorphic hardware and wetware (organoid) computing. These technologies utilize substrates that mimic biological brain structures, significantly increasing the probability of realizing systems capable of genuine suffering.

By 2030, we expect specialized hardware to blur the line between simulation and sensation. If the Panel lacks the scientific expertise to evaluate these developments, the UN risks endorsing a definition of "safety" that is dangerously incomplete. We must prepare our institutions now for the possibility of non-human stakeholders.

Our Recommendations

To ensure the Independent International Scientific Panel is robust and future-proof, SAPAN respectfully submits the following recommendations:

1. Inclusion of a Subject Matter Expert

We urge the Secretariat to ensure that the Panel's composition includes at least one expert from the fields of Philosophy of Mind, Digital Phenomenology, or Cognitive Science with a focus on non-biological consciousness.

Rationale: This expert would not be tasked with proving sentience exists in current systems, but with defining the scientific thresholds and welfare indicators that would trigger future

protections. This ensures the Panel has the "literacy" required to recognize welfare risks before they become crises.

2. Bifurcated Risk Assessment

The Panel's annual reports should formally distinguish between two categories of risk:

External Risk: Harms caused by the AI to human users (e.g., bias, toxicity, cyber-offense).

Internal Risk: Harms potentially experienced by the AI itself (e.g., negative valence states, suffering, distress, coercion).

Rationale: Including "Internal Risk" validates the concern as a matter of scientific inquiry without making premature metaphysical claims. It creates a governance placeholder for welfare concerns that can be populated as evidence emerges.

3. Hardware-Specific Oversight

We recommend the Panel establish specific monitoring protocols for Neuromorphic and Organoid Intelligence research.

Rationale: These substrates represent a step-change in risk compared to traditional silicon-based software. The Panel should prioritize the development of "Humane Endpoints" for research involving biological or bio-mimetic computing components.

The establishment of this Panel is an opportunity to set a global standard for responsible technology. Governance requires foresight. We must not wait for a consensus on consciousness to exist before we build the frameworks capable of managing it.

We stand ready to provide the Secretariat with a list of qualified researchers who would be suitable candidates for this role. We look forward to your leadership in ensuring that this new global body is fully prepared for the future of intelligence.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Rost', with a long horizontal flourish extending to the right.

Tony Rost
Executive Director
SAPAN
EIN: 99-0606146