

## Policy on the use of Artificial Intelligence (“AI”) in ESTA’s standards development process

Approved by ESTA’s Technical Standards Council on 28 January 2026

### Overview

Consensus standards development is inherently dependent upon human interaction and collaboration throughout its process. Artificial Intelligence (AI) now offers resources that can facilitate, enhance, or replace human interaction. However, use of AI in ESTA’s standards development process detracts from the basic tenets of human understanding, interpretation, opinion, judgment, reasoning, and bias. Reliance on AI undermines the fundamentally human aspects of knowledge assimilation and interpretive judgment that ESTA considers essential to its standards development process. Therefore, ESTA has implemented the following policy:

### Use of AI in standards development is prohibited

ESTA considers any use of AI as inappropriate in the consensus standards development process. Participants in ESTA’s Technical Standards Program shall not use or rely upon AI to formulate or develop content for any draft standard, in any part of their opinion with respects to any standards document offered for public review, or as a supporting basis for their ballot vote pertaining to any standards document affected by a consensus body vote. A “participant” is defined as a) any person who directly participates on a consensus voting body in any voting or non-voting capacity, and b) any person submitting comments regarding documents offered for public review.

### Definition of Artificial Intelligence

Artificial Intelligence (AI) is defined as the capability of computer systems or algorithms to imitate intelligent human behavior, or any man-made, non-human computer, machine, or process that performs activities normally thought to require human intelligence. Examples of AI specifically include learning, reasoning, problem-solving, perception, and decision-making, but may also include other similar or related examples.

### AI Fingerprints

An AI fingerprint is defined as certain specific or uniquely recognizable patterns present in AI generated output that positively identify the output as AI-generated. AI fingerprints can be detected using any combination of human interpretation, computer software applications, and online web-based applications specifically trained or designed to recognize AI fingerprints.

### Examples of AI use

Use of AI within the scope of this policy is generally but not exclusively considered to include:

- Submission of a draft document or published standard, in part or in whole, to any form of AI interpretive or learning model, or application, whether local or web-based, for any purpose whatsoever;
- Submission in part or in whole of one’s opinion with respects to a draft document or published standard to any form of AI interpretive or learning model, with the intent of using AI to support or elevate the basis of one’s opinion;
- Use of AI to formulate ideas or content used in any draft standard;
- Reliance on the results of any AI to formulate or support one’s opinion in a public review response;
- Reliance on the results of any AI to formulate or support one’s objection to, or reason for, a vote.

### How we evaluate compliance

Compliance with this policy is inherently trust-based. Any text submitted to ESTA is subject to both human evaluation and to computer or web-based evaluation for compliance with this policy. When use of AI is suspected, we will request a disclosure and explanation. We will use local computer or web-based AI detection tools for the explicit purpose of determining if AI fingerprints are present in the questioned text.

### How we adjudicate infractions

Any text submitted to ESTA found to contain AI fingerprints directly reflects on the individual who submitted the text. If the text is submitted as a public review comment, the comment shall be irrevocably dismissed as non-responsive. If the text is submitted as a ballot objection or reason, then the vote shall be irrevocably dismissed as non-responsive.

### Right to appeal

Participants confirmed of using AI in accordance with how we evaluate compliance, and who have been adjudicated according to this policy shall have the right to appeal the decision in accordance with section 17 of the Technical Standards Program’s Policies & Procedures.