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'I/A' ITEM NOTE

From: General Secretariat of the Council
To: Permanent Representatives Committee/Council
Subject: Endorsement by the Council of the Context Based Risk Analysis (COBRA) Resources model of the methodology for the risk and impact assessment of AI systems on human rights, democracy and the rule of law (HUDERIA) from the Council of Europe Committee on Artificial Intelligence (CAI)
- Approval of a non-binding instrument

1. On 17 May 2024, the Council of Europe adopted a Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law¹. The Convention was signed by the Commission on behalf of the Union on 5 September 2024. Chapter V of the Convention includes an obligation for the Parties to adopt or maintain measures for the identification, assessment, prevention and mitigation of risks posed by artificial intelligence systems by considering actual and potential impacts to human rights, democracy and the rule of law. In addition to the elaboration of the Convention as a binding instrument, the Council of Europe Committee on Artificial Intelligence (CAI) was tasked to develop a non-binding methodology for the Risk and Impact Assessment of AI Systems from the point of view of Human Rights, Democracy and Rule of Law (HUDERIA methodology), in order to support the Parties to the Convention in the implementation of the risk and impact management obligations included in the Convention.

¹ [CETS 225 - Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law \(coe.int\)](#)

2. On 14 June 2024, the Commission submitted to the Council a note on the Commission's intention to commence discussions on a non-binding instrument (NBI) concerning the HUDERIA methodology, which was to be developed by the CAI. During its AGRFISH session on 15 July 2024, the Council authorised the Commission to start negotiations on this NBI.
3. The HUDERIA methodology was finalised and adopted by the CAI at the occasion of its 12th plenary meeting on 26-28 November 2024. Subsequently, the Council, at its TTE (Energy) session on 16 December 2024, authorised the Commission to endorse, on behalf of the Union, the adoption of the HUDERIA methodology, as contained in document WK 15653/24 ADD1.
4. At the stage of the adoption of the HUDERIA methodology, it was decided to finalise and adopt only the main document and to postpone to 2025 the work on the document gathering different detailed elements (examples of questionnaires, review of potentially problematic uses of AI, detailed methodological guidance, etc.) which are meant to help with the concrete implementation of the methodology (the 'HUDERIA model'). Throughout 2025 the Commission kept the WP Telecom informed of the progress of the work on the HUDERIA model, including through the provision of draft versions of the corresponding documents. In particular, a version that was close to the one finally adopted by the CAI was presented and discussed at the meeting of the WP Telecom on 21 October 2025.
5. On 5 December 2025, the Commission informed the Council by means of an NBI note² that the final version of the HUDERIA model, the 'COBRA Resources', was finalised and adopted by the CAI at its 14th plenary meeting on 3-5 November 2025 in Strasbourg. The final version of the HUDERIA model (COBRA Resources) can be found in document ST 16537/25 ADD1. In the NBI note, the Commission confirmed that the model satisfactorily takes into account the comments and input submitted by the Commission on behalf of the EU and it requested the Council's endorsement of its adoption.

² Doc. 16537/25.

6. At the meeting of the WP Telecom on 11 December 2025 the Commission presented the final version of the HUDERIA model (COBRA Resources). The delegations welcomed this information and did not indicate any reservations.
7. In light of the above, the Permanent Representatives Committee is invited to recommend that the Council:
 - during its ECOFIN session on 20 January 2026, authorises the Commission to endorse, on behalf of the Union, the adoption of the definitive version of the HUDERIA model (COBRA Resources), as contained in document ST 16537/25 ADD1.
