



Henna Virkkunen
Executive Vice-Presidents
Tech Sovereignty, Security and Democracy

Cc: **Lucilla Sioli**
Director for AI and Digital Industry
DG CONNECT – European Commission

Sent by email only
Rome, 15 December 2025

Request of the Network for Digital Human Rights to call on the Italian Government to comply with its obligation to publish the list of authorities under Article 77 of Regulation (EU) 2024/1689 (AI Act)

Dear Commissioner Virkkunen,

We are writing on behalf of the **Network for Digital Human Rights** to bring to your attention Italy's failure to comply with the obligation laid down in **Article 77 of Regulation (EU) 2024/1689 (AI Act)**.

The Network for Digital Human Rights is composed of The Good Lobby, Privacy Network, Hermes Center, Strali, Period Think Tank and Amnesty International Italy, and it represents the first Italian coalition composed of civil society organisations, committed to protecting and promoting human rights in the digital context and in relation to the impact of new technologies and artificial intelligence.

Under Article 77(2) of the AI Act each Member State was required to identify **a list of national authorities or public bodies engaged in the protection of human rights by 2 November 2024, in order to give them the power to request and access any documentation relating to the creation and implementation of AI systems**. By the same deadline, the list referred to in Article 77(2) should have been published and notified to the Commission and the other Member States, but one year later we must note that Italy has not yet published or transmitted the aforementioned list, thereby failing to fulfil its obligation.

This delay prevents the full implementation of the safeguards provided for in Article 77, which empowers the authorities responsible for protecting fundamental rights — including the right to non-discrimination — to request and obtain the documentation necessary to effectively supervise the use of high-risk AI systems.

Thus, the absence of such a list compromises the implementation of an essential part of the European governance framework for artificial intelligence.



For these reasons, the **Network for Digital Human Rights** calls on the **European Commission** to urge the Italian Government to promptly publish the list required by Article 77 of the AI Act and to fully comply with its obligations under the AI Act.

Looking forward to your reply, we thank you for your time and consideration.

Yours sincerely,

The Network for Digital Human Rights

The Good Lobby – Privacy Network – Hermes Center – Strali – Period Think Tank – Amnesty International Italy