

**EBRC Response to 2025-00698 (90 FR 3798) Request for Comments on
AISI's Draft Document: Managing Misuse Risk for Dual-Use Foundation Models**

The **Engineering Biology Research Consortium** (EBRC) is pleased to submit this response to the U.S. Artificial Intelligence Safety Institute (AISI)'s Request for Comments on *Managing Misuse Risk for Dual-Use Foundation Models* (90 FR 3798). EBRC is a non-profit, public-private partnership dedicated to building a community that is committed to advancing engineering biology to address national and global needs. EBRC members represent the innovative perspectives of the engineering biology research community that include some of the nation's top scientists and engineers. EBRC is organized into four focus areas and corresponding working groups, one of which is Security.

EBRC supports the addition of Appendix D ("*Application of NIST AI 800-1 to Chemical and Biological Misuse Risk*") to the most recent draft of NIST AI 800-1, focusing on considerations associated with chemical or biological misuse risk. Appendix D provides a reasonable and thorough framework for assisting foundation AI model developers in identifying, assessing, and mitigating chemical and biological misuse risk.

The only potential change EBRC suggests is pairing task categories in **Table D.4** with potential evaluation methods or highlighting evaluations that are needed. However, we recognize that this document is primarily for frontier model developers more generally, and that the specific considerations for chemical and biological models merit their own report. We would also highlight that the models that may pose the largest threat may not fall within the document's definition of "foundational models," for example specialized biological design tools. While we support the framework as written, these novel misuse risks are a salient issue within the biosecurity community, and we encourage NIST AISI to engage in a parallel effort with the scientific community to navigate and chart these unique challenges.

We appreciate the hard work AISI has committed to the development of a safe and secure AI ecosystem. Please reach out if EBRC can be of further use in this important work.