EU AI ACT TIMELINE

STEPHENSON HARWOOD

2024

1 AUG

- EU AI Act enters into force, introducing a phased implantation timetable for AI regulation across the EU.
- Establishes a risk-based framework for AI systems, with regulatory obligations being introduced incrementally.

2025

2 FEB

General provisions and prohibitions start to apply. This includes definitions and AI literacy obligations which providers are required to develop amongst staff.

2 AUG

- Obligations for providers of general-purpose AI (GPAI) models begin to apply.
- EU government structures are established, including the AI Board, the Scientific Panel and the Advisory Forum.
- Member States are required to set up regulatory sandboxes and facilitate "real-world testing".

2026

27 JULY

- Digital Omnibus on AI Regulation enters into force.
- Simplifies a number of measures in the EU AI Act to ensure its effective implementation. Several extensions to EU AI Act compliance deadlines introduced to reduce compliance burdens and support innovation.

2 AUG

- Core transparency obligations under Article 50 of the EU AI Act apply, which includes:
  - Providers informing individuals if they are interacting with an AI system;
  - Provider marking AI-generated or manipulated outputs in a machine-readable format*;
  - Deployers labelling artificially generated or manipulated deepfakes; and
  - Deployer transparency rules for emotional recognition systems and biometric categorisation systems.
- Enforcement of the AI Act concerning general-purpose AI models, prohibitions, transparency rules and AI literacy starts at national and EU-level.
- Measures in support of innovation start to apply.

*Providers of existing generative AI systems have grace period until 2 December 2026 to make AI-generated content detectable.

2 DEC

- Grace Period deadline for Generative AI systems placed on the market before 2 August 2026 to comply with watermarking and detectability requirements.
- New prohibition on AI systems used to generate non-consensual sexual or intimate deepfakes and child sexual abuse materials (CSAM) comes into force.

2027

2 AUG

Member States must have at least one AI regulatory sandbox operational.

2 DEC

- Rules for high-risk AI systems in Annex III become applicable.
- Existing Annex III systems may benefit from exemptions where they were already on the market before this date and have not undergone significant design changes.

2028

2 AUG

- Rules for high-risk AI systems embedded in regulated products under Annex I become applicable.
- Certain existing systems already on the market before this date may remain exempt provided no significant design changes have been made.