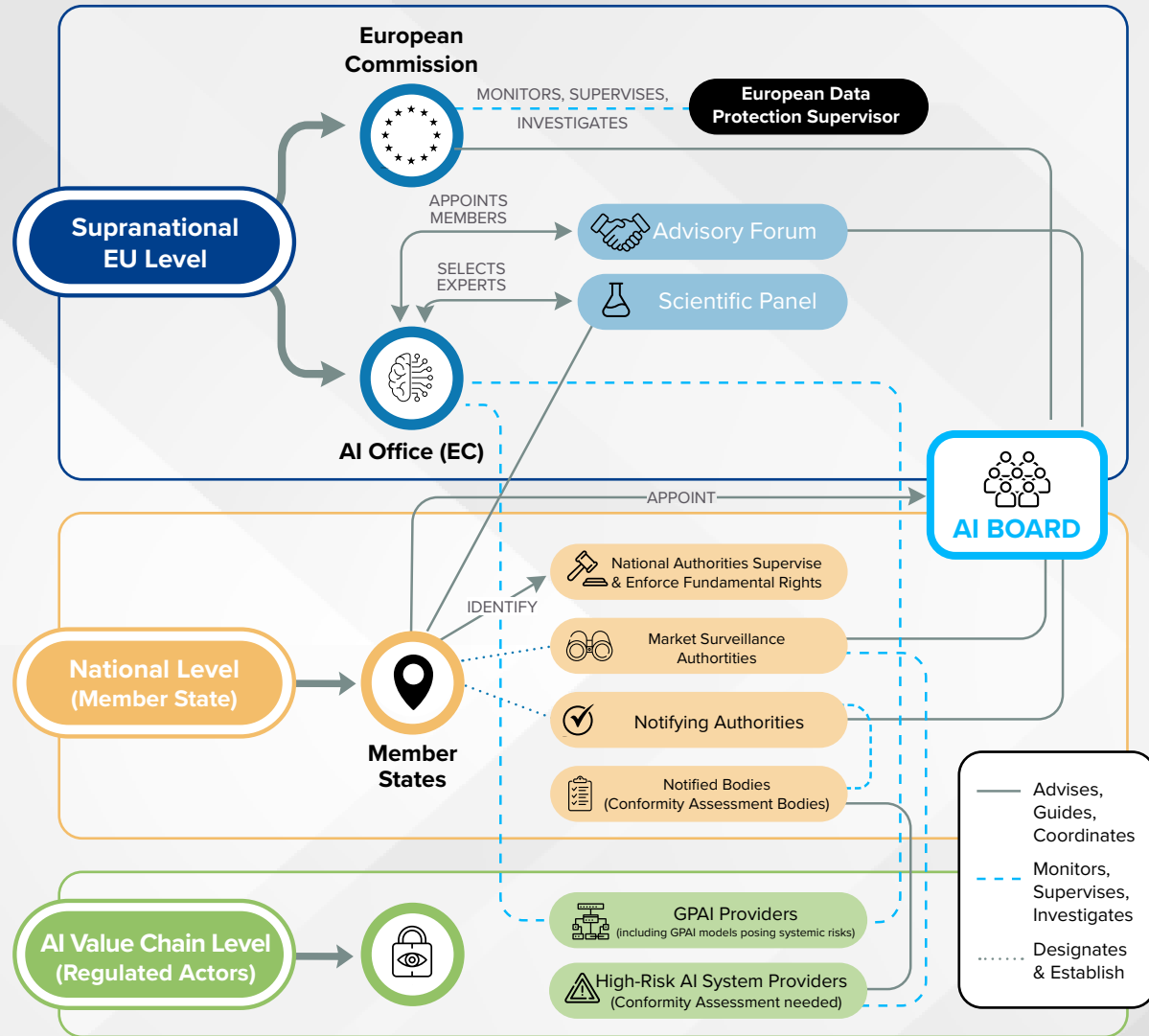


EU AI Act — Governance Architecture and Implementation Framework

EU AI Act – Implementation Dynamics



TOOLS & INSTRUMENTS Supranational & National Enforcement Authorities Will Use for Implementation

The **Commission** is empowered to adopt **Delegated/Implementing Acts**, after consulting with the experts designated by each **Member State**. The power to adopt **Delegated Acts** is conferred on the Commission for a period of five years from **1 August 2024** and may be tacitly extended thereafter.

The **Commission** initiated the **AI Pact**; the **AI Office** invites stakeholders to participate. First Voluntary Pledges under the AI Pact were signed by over 130 stakeholders on **26 September 2024**.

By February 2025: (1) The **AI Board** should support the **Commission** to promote AI literacy tools. Providers and deployers of AI systems shall take measures to ensure a sufficient level of AI literacy of users.

(2) The **Commission** will provide **Guidelines** on the AI definitions and the prohibited AI practices.

By May 2025: (1) The **AI Office** will have to publish **Code(s) of Practice** for General Purpose AI models within nine months after the entry into force. If the AI Office does not deliver on the CoPs for GPAI within 12 months, the **Commission** may issue relevant implementing acts.

(2) The **Commission** requests European Standardization Organizations to craft **Harmonized Standards** (however, there is an expected delay on this – anticipated at the end of 2025). The **AI Board** and the **Advisory Forum** are to be consulted for the preparation of a Standardization request.

By August 2025: (1) The **Commission** should issue **Guidance** to facilitate compliance with the obligations on serious incident reporting.

(2) The **AI Office** and the **Commission** are designing **Templates** that the **AI Board** is empowered to request. The **Commission** and the **AI Office** are planning to publish their **Template(s)** on the summary of content used for training of GPAI models, by August 2025.

By February 2026: (1) The **Commission** (after consulting the **European AI Board**) has to provide **Guidelines** specifying the practical implementation for the classification of High Risk AI systems. The Commission shall update guidelines previously adopted when deemed necessary.

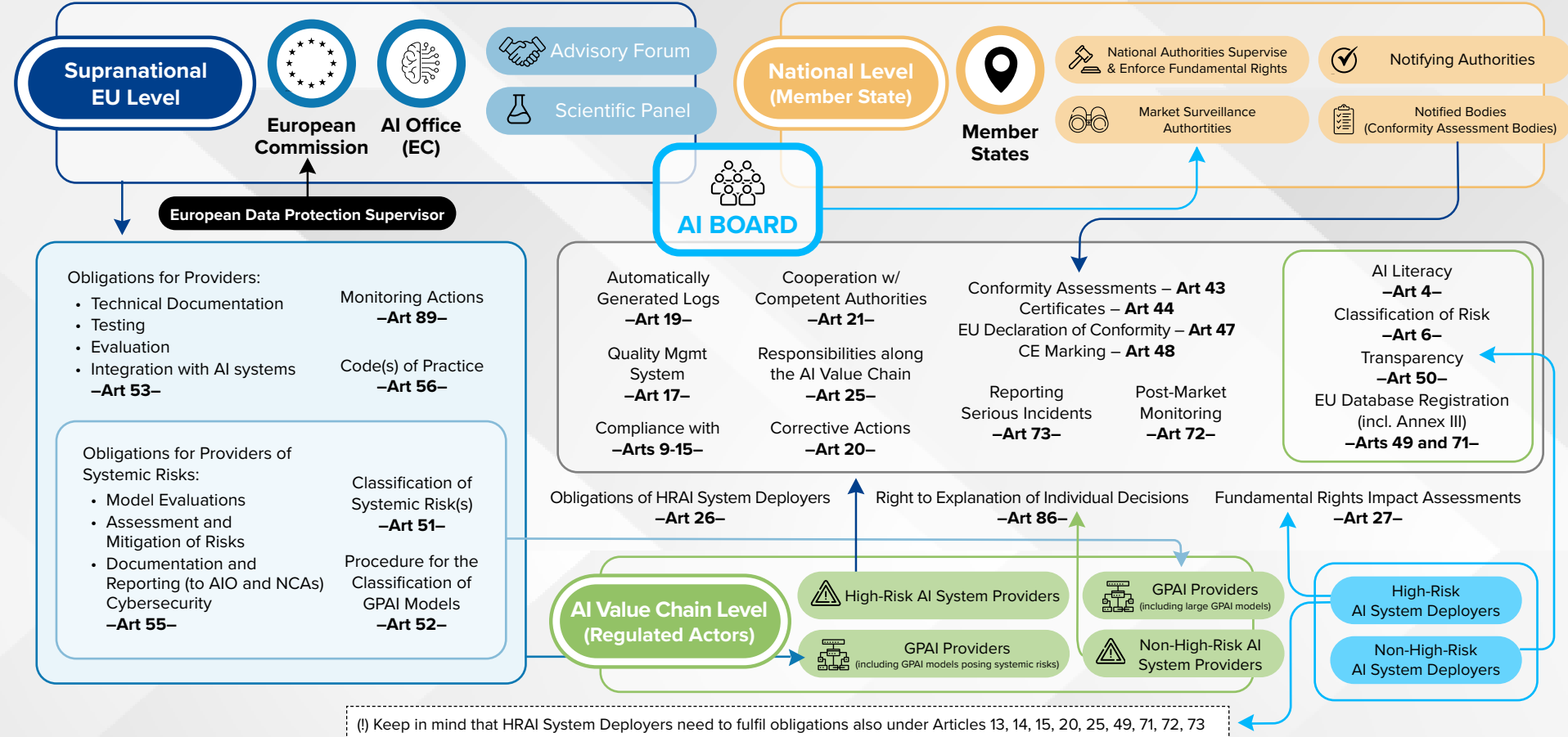
(2) The **Commission** and the **AI Office** are planning to publish their **Template(s)**, detailing the post-market monitoring plan which providers of high-risk AI systems must set up, as well as the list of elements to be included in the plan.

By August 2026: **National Competent Authorities** establish **Regulatory Sandboxes** (to be ensured by Member States). However, the **Commission** is in charge of adopting implements acts for the establishment and development, while the **AI Board** is tasked with ensuring their functioning.

By August 2028: The **AI Office** and the **Member States** shall encourage and facilitate the drawing up of **Codes of Conduct** for voluntary application of specific High-Risk AI requirements but also for Non-High-Risk AI systems.

By 2 August 2028 and every three years thereafter, the Commission will evaluate the impact and effectiveness of voluntary codes of conduct.

EU AI Act – Mapping of Concrete Obligations & Enforcement



Legend on the Goals, Interdependencies and Challenges of the AI Governance Framework

The EU AI Act (AIA) establishes a complex governance model. This infographic examines the potential objectives/tasks, structures, interdependencies, and challenges of establishing a multi-level governance architecture rooted in the interaction of supervisory/enforcement bodies (supranational and national level) with the regulated actors (AI value chain level).

SUPRANATIONAL LEVEL

European Commission (EC):

- Sets Procedures; Operationalizes the risk-based approach; Classification of GPAI; Prohibited Systems; Harmonized Standards & High-Risk Obligations; Information & Transparency; Enforcement activities; Ex-post Evaluation.

European AI Office: Art. 64 AIA and Commission's Decision – Composition: Centralized structure within the EC's DG CNECT.

- Harmonizes AIA implementation and enforcement across the EU; Supports Delegated & Implementing Acts; Standardization and best practices; Assists in the establishment and operation of regulatory sandboxes; Assesses and monitors GPAIs and aids investigations into rule violations; Provides administrative support to other bodies (Board, Advisory Forum, Scientific Panel); Consults and cooperates with stakeholders; Cooperates with other relevant DG and services of the Commission; Supports international cooperation.

European AI Board: Art. 65 AIA – Composition: 1 representative per Member State, with the EDPS participating as an observer and the AI Office attending the meetings, without taking part in the votes. The Board's secretariat provided by the AI Office.

- Facilitates consistent and effective application of the AIA; Coordinates national competent authorities; Harmonizes administrative practices; Issues recommendations and opinions (upon requests of the Commission); Supports the establishment and operation of regulatory sandboxes; Gathers feedback on GPAI-related alerts.

Advisory Forum: Article 67 AIA – Composition: Stakeholders (including industry, start-ups, SMEs, civil society and academia) appointed by the Commission (two-year term); Permanent members: Fundamental Rights Agency, ENISA, European Committee for Standardization,

European Committee for Electrotechnical Standardization, European Telecommunications Standards Institute.

- Provides technical expertise; Prepares opinions, recommendations, and written contributions (upon request of the Board and the Commission); Establishes sub-groups for examining specific questions; Prepares an annual report on activities.

Scientific Panel of Independent Experts: Article 68 AIA – Composition: Independent experts selected by the Commission.

- Supports the enforcement of AI regulation, especially for GPAIs; Provides advice on classifying AI models with systemic risk; Alerts the AI Office of systemic risks; Develops evaluation tools and methodologies for GPAIs; Supports market surveillance authorities and cross-border activities.

NATIONAL (MEMBER STATES) LEVEL

Notifying Authorities: Art. 28-29, 30, 36 AIA – Composition: Designated or established by Member States.

- Process applications for notification from conformity assessment bodies (CABs) and monitor these applications; Cooperate with authorities from other Member States; Ensure no conflict of interest with conformity assessment bodies and assess their impartiality.

Market Surveillance Authorities: Art. 70, 74-76 AIA – Composition: Entities designated or established by Member States as single points of contact.

- Conduct regular audits and facilitate post-market monitoring; Allow providers to voluntarily report any serious incidents or breaches of fundamental rights obligations that come to their attention; Conduct non-compliance investigation and correction for high-risk AI systems (e.g., risk measures); Provide real-world testing oversight and manage serious incident reports.

Notified Bodies: Art. 29-38 AIA – Composition: A conformity assessment body (with legal personality) established under the national law of a Member State, notified under the AIA.

- Verify the conformity of high-risk AI systems; Issue certifications; Manage and document subcontracting arrangements; Conduct Periodic assessment activities (audits); Participate in coordination activities and the European standardization process.

Fundamental Rights Authorities or bodies: Art. 77 AIA – Composition: National public authorities or bodies which supervise or enforce the obligations under Union law protecting fundamental rights, including the right to non-discrimination, in relation to the use of high-risk AI systems referred to in Annex III.

- Request and access any documentation created or maintained in relation to the use of a high-risk AI system falling under Annex III, provided that this is necessary for effectively fulfilling their mandates within the limits of their jurisdiction; Request the market surveillance authority to organize testing of the high risk AI system through technical means; Must be informed by a market surveillance authority which has received a notification related to a serious incident OR to an AI system presenting risk to Fundamental Rights.

AI VALUE CHAIN LEVEL

High-Risk AI Systems Providers: High-Risk AI systems need to undergo a conformity assessment (Art. 43) before being placed in the market or put into service (i.e. data quality, documentation and traceability, transparency, human oversight, accuracy, cybersecurity and robustness – Arts. 9-15); This assessment has to be repeated if the system or its purpose are substantially modified (Arts. 6 and 25). These providers must implement quality and risk management systems (Arts. 6 and 17) and must be registered in a public EU database (Art. 71).

General Purpose AI (GPAI) Model Providers: All Models (including large ones) must: Disclose certain information to downstream system providers (Arts. 25 and 53); Adopt policies to respect copyright law when training their models (Art. 53); Provide publicly available summary about the content used for training of the GPAI model (Art. 53). Models that pose systemic risk must: Assess and mitigate risks (Art. 55); Report serious incidents (Art. 73); Conduct state-of-the-art tests and model evaluations (Art. 55); Ensure cybersecurity of their models (Art. 55).

Non-High-Risk AI Providers: These providers are responsible for: Registration to the EU database (Arts. 49 and 71); Documentation of its assessment before that system is placed on the market or put into service (Art. 6); Voluntary codes of conduct (Art. 95);

High-Risk AI Systems Deployers that are bodies governed by public law, private operators providing public services, operators providing high-risk AI systems that carry out creditworthiness assessments or price and risk assessments in life and health insurance: shall perform an assessment of the impact on fundamental rights and notify the national authority of the results (Art. 27).