

## A COMPREHENSIVE IMPLEMENTATION & COMPLIANCE TIMELINE

Publication to the EU Official Journal & Entry into force of the AI Act **which marks the 24 month countdown of activities towards full effect and enforcement.**

Scope and Definitions apply, **six months** after the entry into force. (Art. 113(a))

Provisions on Prohibited AI kick off, **six months** after the entry into force. (Art. 113(a))

(New) general-purpose AI model obligations will kick-off **within 12 months** after the entry into force. (Art. 113(b))

Member States will have to **designate their Market Surveillance Authorities to act as the Single Point of Contact.** (Art. 70(2))

Member States should lay down and notify to the Commission the **rules on penalties.** (Rec. 179)

The Commission should issue **guidance to facilitate compliance with the obligations on serious incident reporting** (for HRAIs). (Art. 73(7))

(5) Annual **review of the list of Prohibited AI practices** by the Commission. (Art. 112(1))

General Applicability of the Regulation & HRAIs obligations under Annex III kick in, **within 24 months** after the entry into force. (Art. 113)

Member States have to ensure that their competent authorities establish at least one operational sandbox, **within 24 months** after the entry into force. (Art. 57(1))

The Member States shall **notify the Commission of the rules on penalties and of other enforcement measures.** (Art. 99(2))

The AIA affects operators of HRAIs marketed **before 24 months from its start date**, only if these systems experience **major design changes thereafter.** (Art. 111(2))

The providers and deployers of HRAIs intended to be used by public authorities need to comply **within six years** from the entry into force. (Art. 111(2))

AI systems which are components of the large-IT systems established by the legal acts included in Annex X, and placed in the market 36 months before the entry into force, will need to comply **before 31 December 2030.** (Art. 111(1))

AUG  
2024

NOV  
2024

FEB  
2025

MAY  
2025

AUG  
2025

FEB  
2026

AUG  
2026

AUG  
2027

BEFORE END  
OF 2030

FULLY  
OPERATIONAL  
PROCESS

The Member States have to identify their Fundamental Rights authorities **within three months** after the entry into force. (Art. 77(2))

The AI Office will have to publish Code(s) of Practice for General Purpose AI (GPAI) **within nine months** after entry into force. (Art. 56(9))

If by **12 months** no (adequate) CoP is in place, the EC may issue implementing acts.

**Standards-setting process:** To be in place before the general applicability of the AI Act. **30 April 2025** is set as the deadline for deliverables from **EC's standardization request C(2023)3215.**

The European Commission (after consulting the European AI Board) has to provide guidelines specifying the practical implementation for the classification of HRAIs, **no later than 18 months** after entry into force. (Art. 6(5) and 96)

The Commission shall **update guidelines** previously adopted when deemed necessary. (Art. 96(2))

The Commission shall adopt an implementing act laying down detailed provisions establishing a **template for the post-market monitoring plan.** (Art. 72(3))

Application of HRAI obligations that fall under Annex I, **within 36 months** after the entry into force. (Art. 113(c))

Providers of general-purpose AI models, placed on the market before **12 months from the date of entry into force**, shall comply with their obligations **by 36 months from the date of entry into force.** (Art. 111(3))

### PERIODICAL EVALUATION(S) & REVIEW(S): By four years from the entry into force and every four years thereafter,

- the Commission shall evaluate and report to the European Parliament and to the Council of the EU on the following:
  - the **need for amendments extending/adding headings in Annex III (high-risk AI);**
  - amendments to the list of AI systems requiring **additional transparency measures** in Article 50;
  - amendments enhancing the **effectiveness of the supervision and governance system.**
- the Commission shall evaluate the **functioning of the AI Office.**
- the Commission shall submit a report on the review of the progress on the **development of standardization deliverables** on the energy-efficient development of general-purpose models;
- the Commission shall evaluate the **impact and effectiveness of voluntary codes of conduct (by four years from the entry into force and every three years thereafter).** (Art. 112)

## Key Definitions

**AI system:** A machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. **(Art. 3(1))**

**Risk:** The combination of the probability of an occurrence of harm and the severity of that harm. **(Art. 3(2))**

**High-Risk AI system:** Refer to **Article 6** on Classification of AI systems as high-risk. Note that HRAI systems are listed in **Annex I (List of Union Harmonised Legislation)** and **III (High-risk AI systems referred to in Article 6(2))** of the Regulation.

**AI Office:** The European Commission's function of contributing to the implementation, monitoring and supervision of AI systems and general-purpose AI models, and AI governance, provided for in Commission Decision of 24 January 2024; references in this Regulation to the AI Office shall be construed as references to the Commission. **(Art. 3(47))**

**Market Surveillance Authority:** The national authority carrying out the activities and taking the measures pursuant to Regulation (EU) 2019/1020. **(Art. 3(26))**

**National Competent Authority:** A notifying authority or a market surveillance authority; as regards AI systems put into service or used by Union institutions, agencies, offices and bodies, references to national competent authorities or market surveillance authorities in this Regulation shall be construed as references to the European Data Protection Supervisor (EDPS). **(Art. 3(48))**

**European AI Board:** Composed of one representative per Member State, with the EDPS and AI Office participating in meetings as non-voting observers, the Board should ensure consistency and coordination of implementation between national competent authorities. The AI Board will assist the AI Office in supporting National Competent Authorities in the establishment and development of regulatory sandboxes and facilitate cooperation and information-sharing among regulatory sandboxes. **(Art. 65)**

**Post-Market Monitoring System:** Will monitor all activities carried out by providers of AI systems, to collect and review experience gained from the use of AI systems placed on the market or put into service, for the purpose of identifying any need to immediately apply any necessary corrective or preventive actions. **(Art. 3(25))**

**AI Regulatory Sandbox:** A controlled framework set up by a competent authority, which offers providers or prospective providers of AI systems the possibility to develop, train, validate and test, where appropriate in real-world conditions, an innovative AI system, pursuant to a sandbox plan for a limited time under regulatory supervision. **(Art. 3(55))**

**Provider:** A natural or legal person, public authority, agency, or other body that develops an AI system, a general-purpose AI model, or that has an AI system or a general-purpose AI model developed, which places it on the market or puts the AI system into service under its own name or trademark, whether for payment or free of charge. **(Art. 3(3))**

**Deployer:** A natural or legal person, public authority, agency, or other body using an AI system under its authority, except where the AI system is used in the course of a personal non-professional activity. **(Art. 3(4))**

**Operator:** A provider, product manufacturer, deployer, authorised representative, importer, or distributor. **(Art. 3(8))**

**General Purpose AI Model:** An AI model, including where such an AI model is trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market and that can be integrated into a variety of downstream systems or applications, except AI models that are used for research, development, or prototyping activities before they are placed on the market. **(Art. 3(63))**

**General Purpose AI System:** An AI system which is based on a general-purpose AI model and which has the capability to serve a variety of purposes, both for direct use as well as for integration in other AI systems. **(Art. 3(66))**

**Systemic Risk:** A risk that is specific to the high-impact capabilities of general purpose AI models, having a significant impact on the Union market due to their reach, or due to actual or reasonably foreseeable negative effects on public health, safety, public security, fundamental rights, or the society as a whole, that can be propagated at scale across the value chain. **(Art. 3(65))**