

Regulatory Initiatives Grid

European Union Artificial Intelligence Act

January 2024

Foreword by AI & Partners



This first edition of the Regulatory Initiatives Grid (the “Grid”) follows the European Council and Parliament’s political approval of the European Union Artificial Intelligence Act (the “EU AI Act”) marking a historical milestone in its lifetime. This is our first publication, so there is no previous progress to benchmark against.

Significant Developments

The introduction of the EU AI Act marks a pivotal moment in the regulatory landscape, representing a proactive response to the challenges and opportunities presented by artificial intelligence. This groundbreaking legislation underscores the commitment to fostering trust in AI technologies while addressing the inherent risks.

Recognising Change

Recognizing change within the ambit of the EU AI Act is imperative to staying ahead of the evolving AI ecosystem. This underscores our commitment to understanding the nuanced dynamics of AI systems, particularly the risks associated with decision opacity.

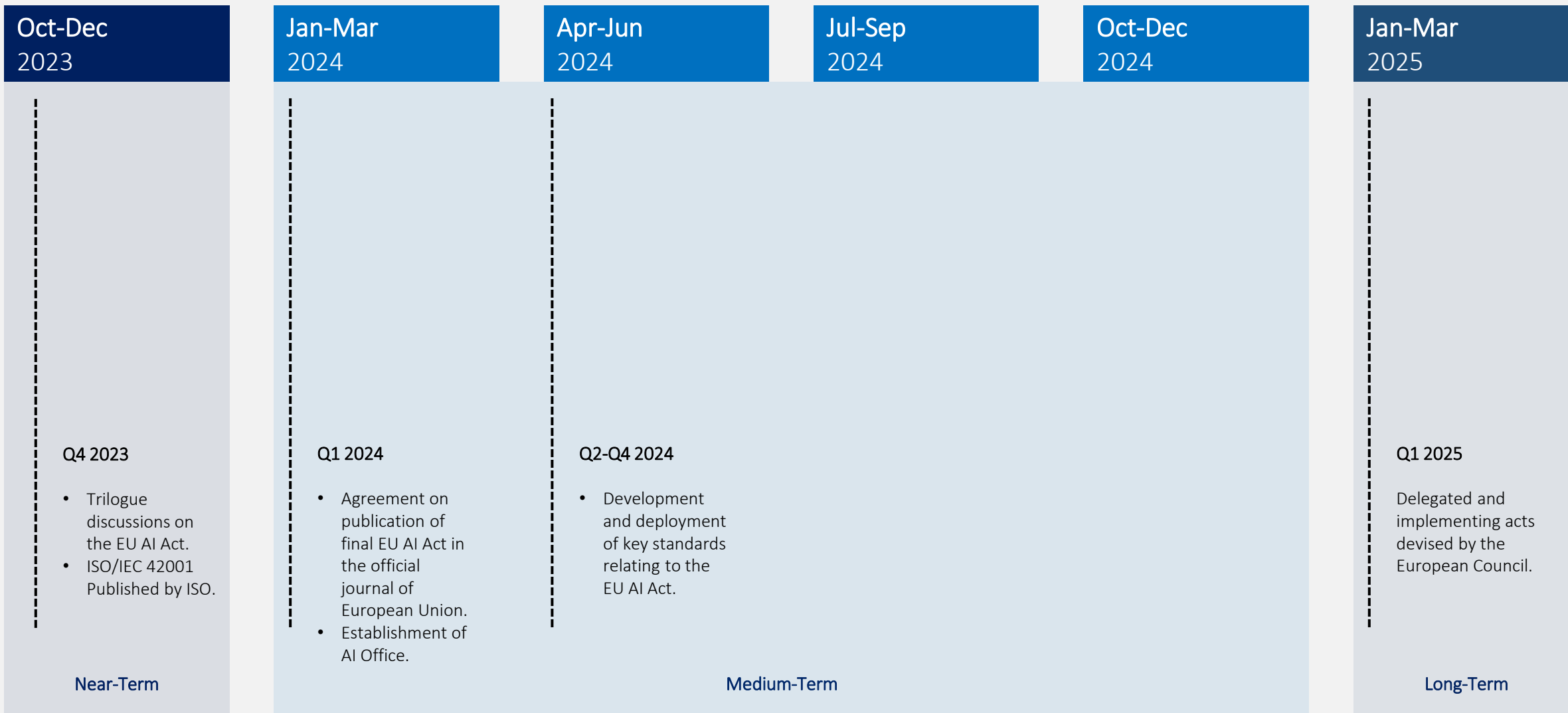
The Act's focus on high-risk applications and the establishment of a robust governance structure exemplifies our recognition of the evolving nature of AI technologies. By addressing the challenges of fairness and accountability, the Act serves as a beacon, guiding stakeholders through the shifting terrain of AI regulation.

Stakeholder Engagement and Feedback

Stakeholder engagement is at the core of the EU AI Act's development, as it acknowledges the diverse perspectives and expertise within the AI ecosystem. This foreword expresses gratitude for the valuable input received from stakeholders, shaping the Act into a comprehensive and inclusive framework.

The engagement process, marked by public consultations and feedback mechanisms, highlights our commitment to transparency and responsiveness. As we navigate the complexities of AI regulation, ongoing stakeholder collaboration ensures that the Act remains a living document, adaptive to the diverse needs and concerns of those it seeks to regulate.

Key Initiatives in the Regulatory Landscape



Introduction: How to Understand this Document



Structure

The Grid follows a ‘Multi-Regulation Approach’ approach that covers inter-related legal initiatives that contribute to building trustworthy AI, rather than sector-specific sections

A number of Grid legal initiatives are closely interconnected. We may highlight some key examples of this throughout to help stakeholders identify relevant related initiatives. This is not an exhaustive list of interactions

Scope

The Grid includes initiatives led by one or more organisations linked to the EU AI Act – Academics and Other Experts, Artificial Intelligence Board, Artificial Intelligence Expert Group, CEN, CENELEC, Civil Society Representatives, ETSI, European Commission, European Parliament, European Stakeholder Organisation, European Standards Organisations, European Union Member State, Harmonised Standards Consultants, Industry Associations, National Competent Authorities, National Standards Bodies, and The Council of the European Union. The Grid also covers inter-related legal initiatives, such as those pertaining to a civil liability framework as well as sectoral safety legislation.

While we do not currently plan to extend the list of organisations, this and future versions of the Grid may include initiatives and/or legislation from a broader set of EU bodies based on expert judgement on an ad hoc basis.

- **Public information** – Stakeholders will generally have been made aware of the initiative and/or legislation through our regular channels of communication.
- **Operational impact** – Initiatives and/or legislation that organisations consider will have an individually significant operational impact during implementation by firms. This means that we believe the initiative and/or legislation is likely to take up a meaningful amount of firms’ time and resources.

The Grid does not include initiatives and/or legislation led by international bodies except where they play a substantial role in calibrating their implementation of trustworthy AI in the EU. It does not include enforcement actions, nor does it include the majority of supervisory activities (since timing and operational impact are firm-specific). Finally, the Grid does not reflect the operational impact of ongoing requirements beyond implementation stage.

Therefore, the Grid is a consolidated presentation of the expected timeframes, as at the date of publication, of a sub-set of regulatory initiatives and/or legislation. These are subject to change including where a decision to vary or not to proceed with a particular initiative and/or legislation is subsequently taken. This edition will not be updated after its initial publication to reflect the impacts of any such decisions.

Information Provided in the Grid

Moving through the columns from left to right, each row provides information on:

- **Lead** – which institution(s) is taking the initiative and/or legislation forward. Where several organisations are noted, this means it is a joint initiative and/or legislation. This generally indicates that organisations are working together which could mean they are undertaking activities in parallel or in sequence.
- **Initiative** – a high-level description of the initiative and/or legislation. Review of the Grid will not be a sufficient substitute for engaging with more detailed material for any initiative.
- **Expected key milestones** – the specific timing of particular milestones, e.g. closing dates for standards, if these are known. The absence of a milestone may mean that a precise date has not been confirmed but activity is still expected as shown in the later quarter-by-quarter columns. Timings are set out as expected at the date of publication of this Grid and are potentially subject to change.
- **Indicative impact on firms** – this is shown as ‘higher’ (H), ‘lower’ (L) or ‘unknown’ (U) on a relative basis amongst initiatives. This is a high-level estimate given the number of initiatives covered and should be interpreted in this regard. It is not a substitute for or comment on any impact assessment or cost-benefit analysis Forum members are carrying out as part of individual initiatives and/or legislation. This estimate is based on the expected operational impact on a firm within scope of the initiative and/or legislation, which will ultimately vary between individual firms. It is not based on the volume of firms affected or non-operational impact of the initiative and/or legislation. A ‘higher’ impact typically indicates we believe the initiative and/or legislation is likely to take up a very substantial amount of firms’ time and resources. A ‘lower’ impact initiative will still take up meaningful time and resource for firms. An initiative and/or legislation may also change from a ‘lower’ to a ‘higher’ impact, and vice versa, over time.
- **Quarter-by-quarter** – a breakdown of the next four quarters, a column covering the following six months (October 2024 to March 2025) and a column for beyond that horizon. Within these columns a shaded cell denotes that a key milestone is currently planned for this period. An ‘E’ denotes the expected point at which firms and other stakeholders should be engaging formally with our organisations – such as when a Delegated Act is open. These notations correspond to what is set out in the expected key milestones for each initiative.
- **Interest to Individuals** – indicates where we expect an initiative is likely to be of interest to individuals. This may be because an initiative and/or legislation is expected to have direct impact on individuals. As with the indicative impact on firms, this is a high-level estimate.
- **Change in timing** – indicates that there has been a substantive change in timings for this initiative and/or legislation since the previous edition of the Grid.
- **New initiative added to the Grid** – indicates that this initiative and/or legislation was not included in the previous edition of the Grid. This may be because it has been recently launched.

Regulatory Initiatives Grid



EU AI Act

Lead Authority(ies)	Initiative	Link	Description	Indicative Impact on Firms	Initiative is Likely to be of Significant Interest to Individuals	Key Milestone
European Parliament and The Council of the European Union	European Union Artificial Intelligence Act	https://digital-strategy.ec.europa.eu/en/library/proposal-regulation-laying-down-harmonised-rules-artificial-intelligence	The new rules establish obligations for providers and users depending on the level of risk from artificial intelligence.	High	Yes	9 December 2023 - The Parliament and the Council reached a provisional agreement on the AI Act.
European Commission	The Artificial Intelligence AI Pact	https://digital-strategy.ec.europa.eu/en/policies/ai-pact	The AI Pact is a scheme that will foster early implementation of the measures foreseen by the AI Act.	Medium	No	15 November 2023 - Launching of a “call for interest” for organisations that want to get actively involved in the AI Pact.
National Standards Body	ISO/IEC 42001: Information technology - Artificial intelligence - Management system	https://www.iso.org/standard/81230.html	ISO/IEC 42001 is an international standard that specifies requirements for establishing, implementing, maintaining, and continually improving an Artificial Intelligence Management System (AIMS) within organizations. It is designed for entities providing or utilizing AI-based products or services, ensuring responsible development and use of AI systems.	High	Yes	18 December 2023 - The International Organisation for Standardisation publishes ISO/IEC 42001.

Regulatory Initiatives Grid



EU AI Act

Lead Authority(ies)	Initiative	Link	Description	Indicative Impact on Firms	Initiative is Likely to be of Significant Interest to Individuals	Key Milestone
European Commission	European Union Artificial Intelligence Act	https://iapp.org/news/a/eu-ai-act-draft-consolidated-text-leaked-online/	As the EU prepares to adopt the AI Act, our experts analyse the key changes in the regulation's recently leaked text, including new exemption criteria for high-risk AI systems, dedicated rules for general purpose AI models and changes to the deadlines for compliance.	High	Yes	22 January 2024 - Finalised text
European Commission	Artificial Intelligence Office	https://digital-strategy.ec.europa.eu/en/library/commission-decision-establishing-european-ai-office-0	On January 24, 2024, the European Commission published a Decision establishing the European Artificial Intelligence Office (AI Office).	High	Yes	24 January 2024 - Establishment of AI Office

Regulatory Initiatives Grid



EU Liability Directive

Lead Authority(ies)	Initiative	Link	Description	Indicative Impact on Firms	Initiative is Likely to be of Significant Interest to Individuals	Key Milestone
European Commission	AI Liability Directive	https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0496	The AI Liability Directive complements and modernises the EU civil liability framework, introducing for the first-time rules specific to damages caused by AI systems.	M	Y	28 September 2022 – Publication of the Proposal for a Directive on adapting non contractual civil liability rules to artificial intelligence

Annex: Initiatives Completed/Stopped



Lead	Initiative	Link	Month Stopped
European Parliament and The Council of the European Union	European Union Artificial Intelligence Act Third trilogue discussions for the EU AI Act	https://ec.europa.eu/commission/presscorner/detail/en/ip_23_6473	December 2023

Contact Details



AI
AI & Partners

Amsterdam - London - Singapore



Email

contact@ai-and-partners.com



Phone

+44(0)7535 994 132



Website

<https://www.ai-and-partners.com/>



Social Media

LinkedIn: <https://www.linkedin.com/company/ai-&-partners/>

Twitter: [https://twitter.com/AI and Partners](https://twitter.com/AI_and_Partners)



AI
AI & Partners

Amsterdam - London - Singapore

Thank You!

Disclaimer



This Presentation may contain information, text, data, graphics, photographs, videos, sound recordings, illustrations, artwork, names, logos, trade marks, service marks, and information about us, our lines of services, and general information may be provided in the form of documents, podcasts or via an RSS feed (“the Information”).

Except where it is otherwise expressly stated, the Information is not intended to, nor does it, constitute legal, accounting, business, financial, tax or other professional advice or services. The Information is provided on an information basis only and should not be relied upon. If you need advice or services on a specific matter, please contact us using the contact details for the relevant consultant or fee earner found on the Presentation.

The Presentation and Information is provided “AS IS” and on an “AS AVAILABLE” basis and we do not guarantee the accuracy, timeliness, completeness, performance or fitness for a particular purpose of the Presentation or any of the Information. We have tried to ensure that all Information provided on the Presentation is correct at the time of publication. No responsibility is accepted by or on behalf of us for any errors, omissions, or inaccurate information on the Presentation. Further, we do not warrant that the Presentation or any of the Information will be uninterrupted or error-free or that any defects will be corrected.

Although we attempt to ensure that the Information contained in this Presentation is accurate and up-to-date, we accept no liability for the results of any action taken on the basis of the Information it contains and all implied warranties, including, but not limited to, the implied warranties of satisfactory quality, fitness for a particular purpose, non-infringement, compatibility, security, and accuracy are excluded from these Terms to the extent that they may be excluded as a matter of law.

In no event will we be liable for any loss, including, without limitation, indirect or consequential loss, or any damages arising from loss of use, data or profits, whether in contract, tort or otherwise, arising out of, or in connection with the use of this Presentation or any of the Information.