

Regulatory Initiatives Grid

European Union Artificial Intelligence Act

April 2024

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

Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Jul-Sep 2024	Oct-Dec 2024	Jan-Mar 2025
<p>Q4 2023</p> <ul style="list-style-type: none"> • Trilogue discussions on the EU AI Act. • ISO/IEC 42001 Published by ISO. <p>Near-Term</p>	<p>Q1 2024</p> <ul style="list-style-type: none"> • Agreement on publication of final EU AI Act in the official journal of European Union. • Establishment of AI Office. 	<p>Q2-Q4 2024</p> <ul style="list-style-type: none"> • Development and deployment of key standards relating to the EU AI Act. • *Ratification of the EU AI Act by the Council of Europe • *Publication of EU AI Act in Official Journal of the European Union • *Entry into force of EU AI Act • *Publication of draft convention on artificial intelligence by Committee on Artificial Intelligence <p>Medium-Term</p>	<p>Q2-Q4 2024</p> <ul style="list-style-type: none"> • *Alignment of EU AI Act with UN's A/78/L.49: Seizing the opportunities of safe, secure and trustworthy artificial intelligence systems for sustainable development • *Establishment of AI Pact by European Commission • *Publication of initial codes of conduct 		<p>Q1 2025</p> <p>Delegated and implementing acts devised by the European Council.</p> <p>Long-Term</p>

*New addition since previous version dated 26 December 2023

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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.

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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
The Council of the European Union	AI Treaty	https://www.coe.int/en/web/artificial-intelligence/cai	The Council of Europe's Committee on Artificial Intelligence (CAI) is currently developing the world's first treaty on AI—an ambitious effort which, by establishing norms around AI governance globally, could have wide-ranging impacts on a range of human rights.	High	No	10 January 2024 - European Union prepares to push back on private sector carve-out from international AI treaty.

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European Commission	European Union Artificial Intelligence Act	https://www.euractiv.com/section/artificial-intelligence/news/eu-countries-give-crucial-nod-to-first-of-a-kind-artificial-intelligence-law/	On 2 February 2024, the latest draft of the European Union (EU) AI Act (EU AI Act) was approved by EU ambassadors following a meeting of the Committee of Permanent Representatives. This approval comes after last minute attempts to derail the EU AI Act by various Member States on the grounds of unspecified data protection concerns.	High	Yes	02 February 2024 - EU Ambassadors reach agreement on consolidated text of EU AI Act. Entry into force scheduled post-publication into Official Journal of European Union.
European Parliament	European Union Artificial Intelligence Act	https://media.licdn.com/dms/document/media/D4E1FAQE8V63oK3SNTQ/feedshare-document-pdf-analyzed/0/1707815130513?e=1708560000&v=beta&t=CTObkPrdyaKCfAcDvWJcN8eOH58VEAAhTyrPeLoisRQ	Artificial Intelligence Act: committees confirm landmark agreement	High	Yes	13 February 2024 - MEPs have endorsed at committee level the provisional agreement on the Artificial Intelligence Act that ensures safety and complies with fundamental rights.
European Parliament	European Union Artificial Intelligence Act		European Parliament vote.	High	Yes	10 April 2024 - [X]
European Commission	European Union Artificial Intelligence Act	https://media.licdn.com/dms/document/media/D561FAQGdp-wM7pqGPQ/feedshare-document-pdf-analyzed/0/1707908646773?e=1708560000&v=beta&t=19QtiZAKI9GzgAi-5FNV0rtNH3Om8DuBto8ukRSXMGc	COMMISSION DECISION - of 24 January 2024 establishing the European Artificial Intelligence Office	High	Yes	14 February 2024 - European Commission decision establishing AI Office published in Official Journal of European Union.

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European Commission	Artificial Intelligence Office	https://digital-strategy.ec.europa.eu/en/policies/ai-office	European AI Office - The European AI Office will be the centre of AI expertise across the EU. It will play a key role in implementing the AI Act - especially for general-purpose AI - foster the development and use of trustworthy AI, and international cooperation.	High	Yes	22 February 2024 - Establishment of dedicated section on website for the European AI Office.
European Parliament	European Union Artificial Intelligence Act	https://www.europarl.europa.eu/sdcms/documents/PRIORITY_INFO/1260/SYN_POJ_March_STR_EN.pdf	European Parliament has fast-tracked the parliamentary approval date for the world's first AI regulation.	High	Yes	13 March 2024 - European Parliament approval date.
European Commission	Artificial Intelligence Office	https://digital-strategy.ec.europa.eu/en/news/job-opportunities-european-ai-office	European AI Office - The European AI Office will be the centre of AI expertise across the EU. It will play a key role in implementing the AI Act - especially for general-purpose AI - foster the development and use of trustworthy AI, and international cooperation.	Medium	No	07 March 2024 - The Commission has opened two calls for expression of interest to recruit new members for the European AI Office. Apply now as technology specialist or administrative assistant for a unique opportunity to shape trustworthy AI.
European Parliament	European Union Artificial Intelligence Act	https://www.europarl.europa.eu/plenary/en/report-details.html?reference=A9-0188-2023	REPORT on the proposal for a regulation of the European Parliament and of the Council on laying down harmonised rules on Artificial Intelligence (Artificial Intelligence Act) and amending certain Union Legislative Acts	High	Yes	11 March 2024 - Final numbering of recitals completed.

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European Parliament	European Union Artificial Intelligence Act	https://www.europarl.europa.eu/news/en/press-room/20240308IPR19015/artificial-intelligence-act-meps-adopt-landmark-law	EU's much-heralded AI Act agreed by EU Parliament – but serious human rights holes in law remain	High	Yes	13 March 2024 - European Parliament provides formal approval of EU AI Act.
The Council of the European Union	Artificial Intelligence, Human Rights, Democracy and the Rule of Law Framework Convention	https://www.coe.int/en/web/portal/-/artificial-intelligence-human-rights-democracy-and-the-rule-of-law-framework-convention	The Framework convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law has been finalised yesterday by the Council of Europe Committee on Artificial Intelligence. The draft text will be referred to the Committee of Ministers for adoption and opened for signature at a later stage.	Medium	No	15 March 2024 - This first-of-a-kind treaty will ensure that the rise of Artificial Intelligence upholds Council of Europe legal standards in human rights, democracy and the rule of law. Its finalisation by our Committee on Artificial Intelligence (CAI) is an extraordinary achievement.
United Nations (UN)	A/78/L.49: Seizing the opportunities of safe, secure and trustworthy artificial intelligence systems for sustainable development	https://press.un.org/en/2024/ga12588.doc.htm	General Assembly Adopts Landmark Resolution on Steering Artificial Intelligence towards Global Good, Faster Realization of Sustainable Development	High	Yes	22 March 2024 - UN passes world's first resolution on emerging technologies.
The Council of the European Union	Committee on Artificial Intelligence (CAI) - Draft Framework Convention on artificial intelligence, human rights, democracy and the rule of law - Draft Explanatory Report	https://media.licdn.com/dms/document/media/D561FAQGyrneUCOYBtA/feedshare-document-pdf-analyzed/0/1711482605880?e=171218800&f=beta&t=tQ83a5bubj4JD4_HTWuFtorNKn-rcV5VmdOp8ak2sPg	This Framework Convention focuses on the protection and furtherance of human rights, democracy and the rule of law, and does not expressly regulate the economic and market aspects of artificial intelligence systems. Taken as a whole, it provides a common legal framework at the global level in order to apply the existing international and domestic legal obligations that are applicable to each Party in the sphere of human rights, democracy and the rule of law of each Party and aim to ensure that the activities within the lifecycle of artificial intelligence systems by both public and private actors comply with these obligations, standards and commitments.	Medium	No	26 March 2024 - Items to be considered by the GR-J at its meeting on 29 April 2024.

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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.	Medium	Yes	28 September 2022 – Publication of the Proposal for a Directive on adapting non contractual civil liability rules to artificial intelligence
European Parliament	New Product Liability Directive	https://www.europarl.europa.eu/legislative-train/theme-a-europe-fit-for-the-digital-age/file-new-product-liability-directive	<p>Among its main provisions, the proposal revising the existing PLD:</p> <p>clarifies that software must be considered a product in the scope of the directive; considers as product defectiveness the lack of software updates under the manufacturer’s control as well as the failure to address cybersecurity vulnerabilities; introduces liability for defective products when refurbished and placed back on the market as well as when manufactured outside the European Union; alleviates the burden of proof for victims under certain circumstances; and extends the nature of damage to medically recognized harm to psychological health and loss or corruption of data.</p>	Medium	No	15 December 2023 - On 28 September 2022, the European Commission published its proposal for a directive on liability of defective products revising the existing Product Liability Directive (PLD) that was adopted nearly 40 years ago. The proposal aims to bring the EU’s product liability regime up to speed with the digital age, the circular economy business models, the global value chains, and the need to ease the burden of proof for consumers seeking compensation for damages suffered because of defective products. The PLD introduces the concept of no fault-based liability of producers for damage caused by defective products.

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
European Parliament	EU's much-heralded AI Act agreed by EU Parliament – but serious human rights holes in law remain	https://www.europarl.europa.eu/news/en/press-room/20240308IPR19015/artificial-intelligence-act-meps-adopt-landmark-law	March 2024

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