ROPES & GRAY

EU AI Act Timeline

This timeline sets out a high-level overview of the key dates for organisations to comply with the EU AI Act.

The dates and obligations generally depend on the risk category assigned to the AI system and the role of the individual or organiser (i.e., whether they are a "provider" or "deployer" of an Al system). Where a deadline applies to a specific role, this has been included in bold.



The EU AI Office will have published codes of practice to help providers of Al systems demonstrate compliance with the Al Act.



The AI Act's provisions on penalties for non-compliance will apply. EU member states are required to implement and notify the European Commission of their respective rules on penalties and other enforcement measures.



EU member states are required to have appointed their respective national competent authorities by this date.



The European Commission will be required to conduct its first annual review of the list of prohibited Al systems and high-risk Al systems by this date.



The European Commission will be required to have issued guidance on serious incident reporting by this date.

Code

- Red: Compliance deadlines for organisations
- Green: Legislation, authority and guidance updates
- Blue: Deadline to qualify for exemptions or extended grace periods for compliance



The European Commission is required to have issued guidance on the practical implementation of the requirements pertaining to high-risk AI systems by this date.



The European Commission is required to have reviewed the AI Act by this date, and every four years thereafter.

1 August 2024

2 February 2025

2 May 2025

2 August 2025

2 February 2026

2 August 2026

2 August 2027

2 August 2029

31 December 2030

The EU AI Act enters into force.



Al systems that present the highest risk under the AI Act will be banned.

Providers and deployers of Al systems are required to take measures to ensure a "sufficient and appropriate level of Al literacy" among their employees and other personnel dealing with the operation and use of Al systems on the organisation's behalf.



Providers of generalpurpose AI models will be required to comply with their relevant obligations under the Al Act.



Providers of generalpurpose AI models who have already placed their Al models on the market by this date have until 2 August 2027 to comply with the AI Act.



Providers, Importers, Distributors, Deployers and other relevant organisations involved in the value chain of high-risk AI systems specifically listed in Annex III of the AI Act (such as AI systems used for biometric or emotional identification, AI systems used for educational and vocational training, and AI systems used in the context of employment and management of workers) will be required to comply with obligations.



Providers and Deployers of certain limited-risk AI systems (such as All chatbots that are intended to interact directly with humans, and All systems capable of generating synthetic content) will be required to comply with requirements.



Operators of high-risk AI systems who have already placed their AI systems onto the market by this date will only be required to comply with the AI Act if they subject their high-risk AI systems to "significant changes in their designs".



Providers of high-risk AI systems that: (i) are intended to be used as a safety component for a product or otherwise constitutes a product under the EU legislation listed in Annex I of the AI Act and (ii) are required to undergo a third party conformity assessment, will be required to comply with the relevant requirements of the AI Act by this date.



Providers of general-purpose AI systems who have placed their relevant AI systems onto the market before 2 August 2025 will be required to comply with their relevant requirements under the AI Act by this date.



Operators of AI systems which are components of certain Large Scale IT systems (i.e., certain large-scale IT systems including: the Schengen Information System, the Visa Information System and the European Travel Information and Authorisation System) that have been placed on the market or put into service before this date will not be required to comply with the AI Act until 31 December 2030.

Operators of Large

Scale IT AI systems that have been placed on the market or put into service before 2 August 2027 must comply with the requirements of the Al Act by this date.

Key definitions

Provider: a natural or legal person, public authority, agency or other body that develops an AI system or a general-purpose AI model, or that has an AI system or a general-purpose AI model developed, and 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. Note that where the provider is established in third countries, they must appoint an "authorised representative" located or established in the EU to perform and carry out on its behalf the obligations and

Importer: a natural or legal person located or established in the Union that places on the market an AI system that bears the name or trademark of a natural or legal person established in a third country.

Distributor: a natural or legal person in the supply chain, other than the provider or the importer, that makes an AI system available on the Union market.

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.

Operator: a provider, product manufacturer, deployer, authorised representative, importer or distributor.