

The EU AI Act: responsibilities of the European Commission

A. INTRODUCTORY REMARKS

1. Transition periods

According to Article 113, the EU AI Act enters into force on **01 August 2024**, which is twenty days after its publication in the Official Journal of the European Union on 12 July 2024.

Consequently, the new law becomes applicable on **01 August 2026**, which is **twenty-four months** from the date of the entry into force.

There are however three special transition periods for certain categories of articles in the AI Act:

- ➔ **Six months** from the date of the entry into force of the AI Act (**01 February 2025**) Chapter I (Article 1 – 4 [Introduction]) and Chapter II (Article 5 [Prohibitions]) will apply.
- ➔ **Twelve months** from the date of the entry into force of the AI Act (**01 August 2025**) Chapter III (Article 28 -39 [Notified bodies]), Chapter V (Article 51 – 56 [GPAI]), Chapter VII (Article 64 – 70 [Governance]), Article 78 [Confidentiality], and Art 99 – 100 [penalties] will apply.
- ➔ **Thirty-six months** from the date of the entry into force of the AI Act (**01 August 2027**) Article 6(1), ANNEX I, and the corresponding obligations will apply.

2. AI systems or GPAI models that are already placed on the market or put into service

Article 111 lays down specific rules for AI systems and GPAI models that have been already placed on the market / put into service before the AI Act entered into force. It presents three cases:

- ➔ AI systems which are components of large-scale IT systems (Annex X) and that have been placed on the market / put into service before **01 August 2027** need to be compliant with the AI Act by **01 August 2030**.
- ➔ All other high-risk AI systems that have been placed on the market / put into service before **01 August 2026** need to be compliant with the AI Act once they are subject to significant changes in their design. If the provider or deployer of that high-risk AI system is however a public authority, it needs to be compliant with the AI Act by **01 August 2030**.
- ➔ GPAI models that have been placed on the market / put into service before **01 August 2025** need to be compliant with the AI Act by **01 August 2027**.

All time frames in the third column of the tables in section B to E of this document assume that the AI system has been placed on the market / put into service after 01 August 2026 or that the GPAI model has been placed on the market / put into service after 01 August 2025.

3. The role of the AI Office

According to Article 3(47), the AI Office stands for the Commission's function of contributing to AI governance as well as the implementation, monitoring and supervision of AI systems and GPAI models provided for in the [Commission Decision of 24 January 2024](#). The definition also states that all references in the law to the AI Office shall be understood as references to the European Commission.

The reader might ask why the AI Act features both terms, in particular since the AI Office should become the new single-point-of-contact for AI within the Commission. The reason is that the term was only added to the legal text during the trilogue negotiations, in an AI governance system that knew so far only the Commission and the AI Board. According to the political agreement in December 2023, the AI Office would have been integrated in that AI governance system, yet being only responsible for Chapter V (GPAI models). Unfortunately, its competences have been afterwards extended to many other parts of the AI Act. My repeated calls in 2024, to go back to the political agreement or – at least – to use just one term in the legal text, have been ignored.

The result is – at best – legal confusion. It might also lead to the exclusion of other departments of the Commission in the implementation and the enforcement of the AI Act. Since the 'AI Board' was replaced by the 'AI Office' in many chapters (also after the political agreement), the Member States have (probably without realizing) given up many of their competences as they are represented by the AI Board but not by the AI Office.

B. TIMELINE FOR ESTABLISHING THE AI GOVERNANCE SYSTEM

Recital 20: Promote AI literacy tools, public awareness and understanding of the benefits, risks, safeguards, rights and obligations in relation to the use of AI systems.	➡ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025 .
Recital 37 and Article 5(5): Receive and register the decision by Member States whether they want to fully or partially authorize the use of 'real-time' remote biometric identification systems in publicly accessible spaces for the purposes of law enforcement.	➡ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025 .
Recital 126 and Article 30(2): Receive and register the notifications sent by the national competent authorities via electronic notification tool (Article R23 of Annex I to Decision No 768/2008/EC) that entail a list of the respective national notified bodies.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 126 and Article 30(4/5): Raise objection if necessary and enter into consultations with the relevant Member States and the conformity assessment body. Afterwards, decide whether the authorization was justified and address the decision to the Member State concerned and to the relevant conformity assessment body.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Article 35: Assign a single identification number to each notified body, even where a body is notified under more than one Union act. Make publicly available the list of the bodies notified under this Regulation, including their identification numbers and the activities for which they have been notified. Ensure that this list is kept up to date.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Article 36: Receive and register notifications from notified authorities, notified bodies or the national competent authorities via the electronic notification tool that indicate changes to the previous notification.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Article 37(1): Investigate all cases where there are reasons to doubt the competence of a notified body or the continued fulfilment by a notified body of the requirements laid down in Article 31 and of its applicable responsibilities.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .

Article 37(4): Inform the notifying Member State accordingly and request it to take the necessary corrective measures, including the suspension or withdrawal of the notification if necessary. Where the Member State fails to take the necessary corrective measures, consider, by means of an implementing act, to suspend, restrict or withdraw the designation.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Article 38: Ensure that, with regard to high-risk AI systems, appropriate coordination and cooperation between notified bodies active in the conformity assessment procedures are put in place and properly operated in the form of a sectoral group of notified bodies. Provide in particular for mechanism to exchange of knowledge and best practices between notifying authorities.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 127 and Article 39: Actively explore possible international instruments to streamline third-party conformity assessments. Pursue also the conclusion of mutual recognition agreements with third countries.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 147 and Article 43: Facilitate, to the extent possible, access to testing and experimentation facilities to bodies, groups or laboratories established or accredited pursuant to any relevant Union harmonization legislation and which fulfil tasks in the context of conformity assessment of products or devices covered by that Union harmonization legislation.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 131 and Article 49 / 71: Establish an EU database of high-risk AI systems and act as the controller in accordance with Regulation (EU) 2018/1725. Develop functional specifications and facilitate an independent audit report. Maximize the availability and use of the EU database for the public by complying with Directive (EU) 2019/882.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 138 / 139 and Article 57(1) / 66(k): Provide technical support, advice and tools for the establishment and operation of AI regulatory sandboxes. Facilitate cooperation and information-sharing among AI regulatory sandboxes	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 139 and Article 57(15): Receive and register the notification of the establishment of an AI regulatory sandbox and provide, if requested, support and guidance. Make publicly available a list of planned and existing sandboxes and keep it up to date in order to	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that

encourage more interaction in the AI regulatory sandboxes and cross-border cooperation.	the related norms apply from 01 August 2026 .
Recital 139 and Article 57(17): Develop a single and dedicated interface containing all relevant information related to AI regulatory sandboxes to allow stakeholders to interact with AI regulatory sandboxes and to raise enquiries with competent authorities, and to seek non-binding guidance on the conformity of innovative products, services, business models embedding AI technologies, in accordance with Article 62(1), point (c). Proactively coordinate with national competent authorities, where relevant.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026 .
Recital 143 and Article 62(3b/c/d): Develop and maintain a single information platform that provides easy to use information in relation to this Regulation for all operators. Organize appropriate communication campaigns to raise awareness about the obligations arising from this Regulation. Evaluate and promote the convergence of best practices in public procurement procedures in relation to AI systems.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026 .
Recital 149 and Article 65 / 66: Support the activities of the standing subgroup for market surveillance by undertaking market evaluations or studies, in particular with a view to identifying aspects of this Regulation requiring specific and urgent coordination among market surveillance authorities.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 149 and Article 65(2): Attend the AI Board's meetings, without taking part in the votes.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 149 and Article 65(8): Provide the secretariat for the AI Board, convene the meetings upon request of the Chair, and prepare the agenda.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 150 and Article 67(1): Establish the advisory forum.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that

	the related norms apply from 01 August 2025 .
Recital 150 and Art 67(2/3): Appoint the members of the advisory forum, in accordance with the criteria set out in paragraph 2, from amongst stakeholders with recognized expertise in the field of AI.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 151 and Article 68(1/5): Establish the scientific panel and clarifying the conditions, procedures and detailed arrangements for the scientific panel and its members but also the structure and level of fees (Art 69(1)) that Member States need to pay for the advice and support of the scientific panel's experts.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 151 and Article 68(2): Select experts for the scientific panel on the basis of up-to-date scientific or technical expertise in the field of AI necessary for the tasks set out in paragraph 3 and the conditions in paragraph 2. Determine the number of experts on the panel in accordance with the required needs. Ensure a fair gender and geographical representation.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 151 and Article 68(4): Make the declaration of interests of each expert of the scientific panel public and establish systems as well as procedures to actively manage and prevent potential conflicts of interest.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 163 and Article 68 / 90: Equip the scientific panel with the information necessary for the performance of its tasks.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 163 and Article 68 / 90: Establish a mechanism whereby the scientific panel can request the Commission to require documentation or information from a GPAI model provider.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 151 and Article 69: Facilitate timely access to the experts by the Member States, as needed, and ensure that the combination of support activities carried out by Union AI testing support pursuant to Article 84 and experts pursuant to this Article is efficiently organized and provides the best possible added value.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .

Recital 153 / 154 and Article 70(2): Receive and register the identity of the notifying authorities and the market surveillance authorities and the tasks of those authorities, as well as any subsequent changes thereto. Identity and make a list of the single points of contact publicly available.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 131 and Article 71(1/6): Set up and maintain an EU database containing information referred to in paragraphs 2 and 3 of this Article concerning high-risk AI systems referred to in Article 6(2) which are registered in accordance with Articles 49 and 60 and AI systems that are not considered as high-risk pursuant to Article 6(3) and which are registered in accordance with Article 6(4) and Article 49. Consult the relevant experts, and when updating the functional specifications of such database, the Commission shall consult the Board. Act as the controller of the EU database and make it available to providers, prospective providers and deployers adequate technical and administrative support, while complying with the applicable accessibility requirements.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 155 and Article 77(2): Receive and assess a list that identify the National public authorities or bodies which supervise or enforce the respect of obligations under Union law protecting fundamental rights	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 152 and Article 84: Designate one or more Union AI testing support structures to perform the tasks listed under Article 21(6) of Regulation (EU) 2019/1020 in the area of AI.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 162 and Article 89(2): Provide for the possibility that downstream providers lodge complaints about possible infringements of the rules on providers of GPAI models and systems.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 165: Develop initiatives, including of a sectoral nature, to facilitate the lowering of technical barriers hindering cross-border exchange of data for AI development, including on data access infrastructure, semantic and technical interoperability of different types	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

of data <i>[part of the recital for Article 95 but not necessarily referring to codes of conduct only]</i> .	
Recital 168 / 179 and Article 99(2) / 113: Receive and register the notification by Member States on the rules on penalties and of other enforcement measures referred to in paragraph 1, and shall notify it, without delay, of any subsequent amendment to them.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Article 2(2c) in the Commission's decision to establish an AI Office: Support the accelerated development, roll-out and use of trustworthy AI systems and applications that bring societal and economic benefits and that contribute to the competitiveness and the economic growth of the Union. In particular, promote the innovation ecosystems by working with relevant public and private actors and the startup community.	➡ Already applicable since the Decision entered into force on 21 February 2024 .
Article 2(2d) in the Commission's decision to establish an AI Office: Monitor the evolution of AI markets and technologies.	➡ Already applicable since the Decision entered into force on 21 February 2024 .
Article 4 in the Commission's decision to establish an AI Office: Establishing fora for cooperation of providers of AI models and systems to advance best practices and contribute to the development of codes of conduct and codes of practice. Conduct regular consultation of stakeholders, including experts from the scientific community and the educational sector, citizens, civil society and social partners, where relevant, to collect input for the performance of its tasks. Establish a forum for cooperation with the open-source community with a view to identify and develop best practices for the safe development and use of open-source AI models and systems.	➡ Already applicable since the Decision entered into force on 21 February 2024 .
Article 5 in the Commission's decision to establish an AI Office: Work with other relevant Directorate-Generals and services of the Commission notably with the European Centre for Algorithmic Transparency as regards the evaluation and testing of GPAI models and systems. Support other relevant Directorate-Generals and services of the Commission with a view to facilitate the use of AI models and systems as transformative tools in the	➡ Already applicable since the Decision entered into force on 21 February 2024 .

relevant domains of Union policies, as well as to raise awareness about emerging risks.	
Article 7 in the Commission's decision to establish an AI Office: Closely cooperate with international partners with regards to all matters on AI and in particular on promoting the EU approach, on AI governance and on the implementation of international agreements.	➔ Already applicable since the Decision entered into force on 21 February 2024 .

C. TIMELINE FOR SECONDARY LEGISLATION

1. Delegated acts

Recital 53 / 173 and Article 6(6/7), 97: Empowered to amend Article 6(3) by adding new conditions, by modifying or by deleting them if there is concrete and reliable evidence of the existence of AI systems that should not fall under ANNEX III or that should not fall under the conditions of Article 6(3). <u>Applies to all of the following items under point C.1:</u> Recital 173 and Article 97(4/5/6): Carry out appropriate consultations during its preparatory work, including at expert level. Conduct those consultations in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making. Ensure equal participation in the preparation of delegated acts. The European Parliament and the Council should receive all documents at the same time as Member States' experts, and their experts should systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026. Power to issue delegated acts is conferred on the European Commission for a period of five years from 01 August 2024 to 1 August 2029.
Recital 52 / 173 and Article 7(1/3) / 97: Empowered to amend ANNEX I and III, for instance by adding, modifying and removing use-cases of high-risk AI systems.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 71 / 173 and Article 11(3) / 97: Empowered to amend Annex IV, where necessary, to ensure that, in light of technical progress, the technical documentation provides all the information necessary to assess the compliance of the system.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 124 / 173 and Article 43(5/6) / 97: Empowered to amend Annexes VI and VII by updating them in light of technical progress as well as to amend Article 43(1/2) in order to subject high-risk AI systems referred to in points 2 to 8 of Annex III to third-party conformity assessments.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 173 and Article 47(5) / 97: Empowered to amend Annex V by updating the content of the EU declaration of conformity set out in that Annex, in order to introduce elements that become necessary in light of technical progress.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

Recital 111 / 173 and Article 51(3) / 97: Empowered to amend the thresholds for systemic GPAI models listed in Article 51(1/2) as well as to supplement benchmarks and indicators in light of evolving technological developments, such as algorithmic improvements or increased hardware efficiency, when necessary, for these thresholds to reflect the state of the art. Supplement it with benchmarks and indicators for model capability.	➔ When deemed necessary. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 112 / 173 and Article 52(4) / 97: Empowered to amend Annex XIII by specifying and updating the criteria for systemic GPAI models.	➔ When deemed necessary. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 101 / 173 / 179 and Article 53(5/6) / 97: Empowered to amend Annexes XI and XII in light of evolving technological developments and to detail measurement and calculation methodologies with a view to allowing for comparable and verifiable documentation.	➔ When deemed necessary. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .

2. Implementing acts

Recital 175 and Article 37(4) / 98(2): Suspend, restrict or withdraw the designation of notified bodies when the Member State fails to take the necessary corrective measures.	➔ When deemed necessary. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 121 / 175 and Article 41(1/4) / 98(2): Establish, in the absence of relevant references to harmonized standards, common specifications for certain requirements for high-risk AI systems or for GPAI models. Repeal those implementing acts or parts thereof when a harmonized standard is published in the Official Journal of the European Union, which covers the same requirements set out in Section 2 of this Chapter III. Where a Member State considers that a common specification does not entirely meet the requirements, the Commission shall assess that information and, if appropriate, amend the implementing act.	➔ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026 .
Recital 135 and Article 50(7) / 98(2): Adopt implementing acts to approve codes of practice to facilitate the effective implementation of the obligations	➔ When deemed necessary. General rule of Art 113 applies, meaning that the

regarding the detection and labelling of artificially generated or manipulated content as described in Article 50(7) in accordance with the procedure laid down in Article 56 (6). If the code is not adequate, provide by means of implementing acts a set of common rules for the implementation of the obligations of Article 50.	related norms apply from 01 August 2026.
Recital 117 and Article 56(6/9) / 98(2): Adopt an implementing act to approve a code of practice for GPAI models and give it a general validity within the Union. If the code is not adequate, provide by means of implementing acts common rules for the implementation of the obligations provided for in Articles 53 and 55, including the issues set out in Article 56(2).	➡ When deemed necessary. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 139 / 175 and Article 58(1) / 98(2): Specify the detailed arrangements for the establishment, development, implementation, operation and supervision of the AI regulatory sandboxes.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 141 / 175 and Article 60(1) / 98(2): Specify the detailed elements of the real-world testing plan.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 155 and Article 72(3) / 98(2): Adopt an implementing act laying down detailed provisions establishing a template for the post-market monitoring plan from providers of high-risk AI systems and the list of elements to be included in that plan.	➡ To be published by 01 February 2026.
Recital 164 / 175 and Article 92(6) / 98(2): Setting out the detailed arrangements and the conditions for the GPAI evaluations, including the detailed arrangements for involving independent experts, and the procedure for the selection thereof.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 169 / 175 and Article 101(6) / 98(2): Adopt detailed arrangements and procedural safeguards for proceedings in view of the possible adoption of sanctions for GPAI providers.	➡ When deemed necessary. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

3. Guidelines

Recital 53 and Article 6(5): Develop guidelines about the conditions under which an AI system that is falling under ANNEX III can be, on an exceptional basis, considered as non-high-risk AI system. Complement those guidelines by a comprehensive list of practical examples of use cases that are high-risk and use cases that are not.	➔ To be published by 01 February 2026.
Recital 146 and Article 63: Develop guidelines on the elements of the quality management system, which may be complied with in a simplified manner considering the needs of microenterprises, without affecting the level of protection or the need for compliance with the requirements in respect of high-risk AI systems.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 155 and Article 73(7): Develop dedicated guidance to facilitate compliance with the reporting obligations of serious incidents.	➔ To be published by 01 August 2025. Regularly reassessed.
Article 96: Develop guidelines on the practical implementation of this Regulation, and in particular on: (a) the obligations of Article 8-15 as well as of Article 25, (b) Article 5, (c) the term of 'substantial modification', (d) Article 50, (e) the relationship of the AI Act with the laws listed in ANNEX I, and (f) the definition of AI systems. Those guidelines should be regularly updated, taking the complementarity between this Regulation and existing sectoral Union law into account. When issuing guidelines, the Commission shall pay particular attention to the needs of SMEs including start-ups, of local public authorities and of the sectors most likely to be affected by this Regulation.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.

4. Templates & benchmarks

Recital 38 and Article 5(6): Develop a template for the annual reports of Member States on the use of 'real-time' remote biometric identification systems in publicly accessible spaces for law enforcement purposes.	➔ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025.
Recital 71 and Article 11(1): Establish a simplified technical documentation form targeted at the needs of small and microenterprises.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.

Recital 74 and Article 15(2): Encourage, as appropriate, the development of benchmarks and measurement methodologies for AI systems. Take note and collaborate with international partners working on metrology and relevant measurement indicators relating to AI.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.
Recital 90 and Article 25(4): Develop voluntary model contractual terms between providers of high-risk AI systems and third parties that supply tools, services, components or processes that are used or integrated in high-risk AI systems, to facilitate the cooperation along the value chain. When developing those voluntary model terms, take into account possible contractual requirements applicable in specific sectors or business cases. The voluntary model terms shall be published and be available free of charge in an easily usable electronic format.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.
Recital 96 and Article 27(5): Develop a template for a questionnaire, including through an automated tool, to facilitate deployers to conduct the FRIA in a simplified manner but also to reduce the administrative burden for deployers.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.
Recital 107 and Article 53(1d): Provide a template for the detailed summary about the copyright protected content used for training of the GPAI model, which should be simple, effective, and allow the provider to provide the summary in narrative form.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 143 and Article 62(3a): Provide standardized templates to address the specific needs of SMEs, including start-ups for the areas covered by this Regulation.	➡ If requested by the AI Board. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026.
Recital 174 and Article 112(11): To guide the evaluations and reviews referred in Art 112, develop an objective and participative methodology for the evaluation of risk levels based on the criteria outlined in the relevant Articles and the inclusion of new systems in Article 5, Annex III, and Art 50.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

5. Codes of practice

Recital 135 and Article 50(7): Encourage and facilitate the drawing up of codes of practice at Union level to facilitate the effective implementation of the obligations	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that
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in Article 50(2/4) regarding the detection and labeling of artificially generated or manipulated content, including to support practical arrangements for making, as appropriate, the detection mechanisms accessible and facilitating cooperation with other actors along the value chain, disseminating content or checking its authenticity and provenance to enable the public to effectively distinguish AI-generated content.	the related norms apply from 01 August 2026 .
Recital 116 and Article 56(1/3): Encourage and facilitate the drawing up, review and adaptation of codes of practice for GPAI models, duly taking into account international approaches as well as a diverse set of perspectives by collaborating with relevant national competent authorities and, where appropriate, by consulting with civil society organizations and other relevant stakeholders and experts, including the Scientific Panel.	➡ To be ready at latest by 01 May 2025 as stated in Recital 179 / Article 56(9).

6. Codes of conduct

Recital 20 and Article 4: Facilitate the drawing up of voluntary codes of conduct to advance AI literacy among persons dealing with the development, operation and use of AI.	➡ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025 .
Recital 165 and Article 95: Encourage and facilitate the drawing up of codes of conduct, including related governance mechanisms, intended to foster the voluntary application to AI systems, other than high-risk AI systems, of some or all of the high-risk requirements in Chapter III Section 2.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norm applies from 01 August 2026 .

7. Standardization request

Recital 81 / 121 and Article 40(2): Issue a standardization request after consulting the AI Board and relevant stakeholders, specifying that standards have to be clear and consistent (including with the standards developed in the various sectors for products covered by the existing Union harmonization legislation listed in Annex I). The request should cover all requirements set out in Section 2 of Chapter III of the AI Act and, as applicable, obligations set out in Chapter V, Sections 2 and 3, of this Regulation. Besides, it should ask for deliverables on reporting and documentation processes to improve AI systems' resource performance,	➡ Without undue delay after the AI Act entered into force on 1 August 2024 .
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such as reducing the high-risk AI system's consumption of energy and of other resources during its lifecycle, and on the energy-efficient development of GPAI models. Finally, request the European standardization organizations to provide evidence of their best efforts to fulfil the objectives referred to in the first and the second subparagraph of this paragraph in accordance with Article 24 of Regulation (EU) No 1025/2012.	
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D. ENFORCEMENT ACTIVITIES

Recital 130 and Article 46(3/5): Receive and assess notifications from market surveillance authorities that the conditions for a derogation from conformity assessment procedure applies. Raise, if necessary, an objection and subsequently, enter into consultations with the relevant Member State. Decide whether the authorization is justified and address that decision to the Member State concerned and to the relevant operators. If necessary, withdrawn the decision of the market surveillance authority of the Member State concerned.	➔ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 111 / 113 and Article 52(1/3/4): Designate a GPAI model as presenting systemic risks.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 112 and Article 52(1): Receive and assess the notifications of systemic GPAI model developers that they met the thresholds.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 113 and Article 52(4): Receive and assess the qualified alerts by the scientific panel.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 112 and Article 52(5): Receive the request of a GPAI model provider that objects the designation and consider whether to decide to reassess if the GPAI model can still be considered to present systemic risks on the basis of the criteria set out in Annex XIII.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 112 and Article 52(6): Ensure that a list of GPAI models with systemic risk is published and keep that list up to date.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 101 and Article 53(1a): Request and assess technical documentation (Annex XI) from GPAI model providers.	➔ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that

	the related norms apply from 01 August 2025 .
Recital 108 and Article 53(1c/d): Monitor whether the GPAI model provider has fulfilled the obligations without verifying or proceeding to a work-by-work assessment of the training data in terms of copyright compliance.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 117 and Article 53(4): Assess and – if adequate – approve the alternative adequate means of compliance from providers of GPAI models who do not adhere to an approved code of practice or do not comply with a European harmonized standard.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 82 and Article 54(3/5): Receive and assess the copies of the written mandate as well as the technical documentation provided by the authorized representative of a GPAI model provider. Register the termination of the written mandate.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 115 and Article 55(1c): Receive and assess relevant information from providers of GPAI models with a systemic risk about serious incidents and possible corrective measures to address them.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 117 and Article 55(2): Assess and – if adequate – approve the alternative adequate means of compliance from providers of GPAI models who do not adhere to an approved code of practice or do not comply with a European harmonized standard.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 117 and Article 56(5/6): Ensure that participants to the GPAI codes of practice regularly report on the implementation of the commitments and the measures taken and their outcomes. Monitor and evaluate the achievement of the objectives of the GPAI codes of practice by the participants and their contribution to the proper application of this Regulation.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .
Recital 117 and Article 56(6/8): Assess whether the GPAI codes of practice cover the obligations provided for in Articles 53 and 55 and publish the assessments of the adequacy of the codes of practice.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025 .

Recital 139 and Article 57(11): Receive and register the notifications of national competent authorities in case they have temporarily or permanently suspend the testing process, or the participation in the sandbox of a participant of an AI regulatory sandbox.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 143 and Article 62: Regularly assess the certification and compliance costs for SMEs, including start-ups, through transparent consultations. Work with Member States to lower such costs.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 149 and Article 66(e): Receive and assess recommendations and written opinions on any relevant matters of the AI Board related to the implementation of the AI Act and to its consistent and effective application.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 150 and Article 67(8): Receive and assess opinions, recommendations and written contributions issued by the advisory forum.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 155 and Article 73(11): Receive and register any serious incident notified by the national competent authorities, whether or not they have taken action on it, in accordance with Article 20 of Regulation (EU) 2019/1020.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 160 and Article 74(11): Provide coordination support for joint investigations that have the aim of promoting compliance, identifying non-compliance, raising awareness and providing guidance conducted by either market surveillance authorities or between them and the Commission.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 161 and Article 75(1): Monitor and supervise with the powers of a market surveillance authority within the meaning of Regulation (EU) 2019/1020 if an AI system is based on a GPAI model, while both of them are provided by the same provider.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 161 and Article 75(2): Cooperate with the relevant market authorities and carry out evaluations if those consider that a GPAI system (that can be used directly by deployers for at least one purpose that is classified as high-risk) is non-compliant with the requirements laid down in this Regulation.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

Recital 161 and Article 75(3): Assist market surveillance authorities if those are unable to conclude an investigation on a high-risk AI system because of their inability to access certain information related to the GPAI model on which the high-risk AI system is built.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Article 79(3/7): Receive the notification of a market surveillance authority that considers that the non-compliance of an AI system, which presents a risk in accordance to Article 3, point 19 of Regulation (EU) 2019/1020, is not restricted to its national territory. The notification should include the results of the evaluation and of the actions which it has required the operator to take.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Article 80(3): Receive the notification of a market surveillance authority that considers that the non-compliance of a high-risk AI system that is wrongly classified as non-high risk is at the same time not restricted to its national territory. The notification should include the results of the evaluation and of the actions which it has required the operator to take.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Article 81(1): Enter into consultation with the market surveillance authority of the relevant Member State and the operator or operators, and evaluate the national measure if within three months of receipt of the notification referred to in Article 79(5), or within 30 days in the case of non-compliance with the prohibition of the AI practices referred to in Article 5, objections are raised by the market surveillance authority of a Member State to a measure taken by another market surveillance authority, or where the Commission considers the measure to be contrary to Union law. On the basis of the results of that evaluation, decide (within six months, or within 60 days in the case of non-compliance with the prohibition of the AI practices referred to in Article 5, starting from the notification referred to in Article 79(5)) whether the national measure is justified. Notify on that decision to the market surveillance authority of the Member State concerned as well as all other market surveillance authorities of its decision. Receive the notifications from Member States that they took the appropriate restrictive measures in respect of the AI system concerned or from the concerned Member State that they have withdrawn the measure.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

Article 81(3): Apply the procedure provided for in Article 11 of Regulation (EU) 1025/2012 if the national measure is considered justified and the non-compliance of the AI system is attributed to shortcomings in the harmonized standards or common specifications referred to in Articles 40 and 41 of this Regulation.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Article 82(3): Receive the notification from Member States that have evaluated based on Article 79 that a compliant AI system poses nevertheless a risk. Enter into consultation with the Member States concerned and the relevant operators, and evaluate the national measures taken. On the basis of the results of that evaluation, decide whether the measure is justified and, where necessary, propose other appropriate measures. Immediately communicate that decision to the Member States and to the relevant operators.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 164 and Article 89(1): Monitor the effective implementation and compliance with the AI Act by providers of GPAI models, including their adherence to approved codes of practice.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 164 and Article 91(1/2): Request that the documentation (drawn up by the provider in accordance with Articles 53 and 55, or any additional information that is necessary for the purpose of assessing compliance of the provider with this Regulation) is provided. If useful, initiate a structured dialogue with the provider of the GPAI model beforehand. Inform the AI Board.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 164 and Article 91(3): Issue a request for information to a provider, where the access to information is necessary and proportionate for the fulfilment of the tasks of the scientific panel under Article 68(2).	➡ If duly substantiated requested. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 164 and Article 92(1/2/3): Conducting evaluations and investigations, with the possibility of involving independent experts that can carry out the evaluations on the AI Office behalf or of requesting access to the GPAI model concerned through APIs or further appropriate technical means and tools, including source code. If useful, initiate a structured dialogue with the provider of the GPAI model beforehand. Inform the AI Board.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 164 and Article 93(1/2/3): Requests from the GPAI model provider to take appropriate measures,	➡ No concrete time frame to fulfill this task. General rule of

including risk mitigation measures in the case of identified systemic risks as well as restricting the making available on the market, withdrawing or recalling the model. If useful, initiate a structured dialogue with the provider of the GPAI model beforehand. Inform the AI Board. If, during the structured dialogue, the provider of the GPAI model with systemic risk offers commitments to implement mitigation measures to address a systemic risk at Union level, there is the possibility to make those commitments binding and declare that there are no further grounds for action.	Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 169 and Article 101(1/2): Impose on providers of GPAI models fines not exceeding 3 % of their annual total worldwide turnover in the preceding financial year or EUR 15 000 000, whichever is higher, when the Commission finds that the provider intentionally or negligently infringed relevant provisions or failed to comply with requests or measures. Take into account commitments made in accordance with Article 93(3) or made in relevant codes of practice in accordance with Article 56. Before adopting the decision, communicate the preliminary findings to the provider of the GPAI model and give it an opportunity to be heard.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.

E. EX-POST EVALUATION

Recital 36 and Article 5(6): Receive and assess the annual reports on the use of ‘real-time’ remote biometric identification systems in publicly accessible spaces for law enforcement purposes.	➡ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025. The first annual reports by Member States should be published in August 2025.
Recital 38 and Article 5(7): Publish annual reports on the use of real-time remote biometric identification systems in publicly accessible spaces for law enforcement purposes, based on aggregated data in Member States on the basis of the annual reports referred to in Article 5(6).	➡ No concrete time frame to fulfill this task. Rule of Art 113(a) applies, meaning that the related norms apply from 01 February 2025. First annual report by Commission not before the end of 2025.
Recital 117 and Article 56(6/8): Encourage and facilitate the review and adaptation of the codes of practice for GPAI, in particular in light of emerging standards and the availability of harmonized standards.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 139 and Article 57(8): Access the exit reports and take them into account, as appropriate, when exercising tasks under the AI Act. If both the provider / prospective provider and the national competent authority explicitly agree, the exit report can be made publicly available through the single information platform.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 139 and Article 57(16): Take into account the annual reports, submitted by national competent authorities after they established their AI regulatory sandbox.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 156 and Article 74(2): Receive and assess the annual reports from market surveillance authorities, stating any information identified in the course of market surveillance activities that may be of potential interest for the application of Union law on competition rules.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 173 and Article 97(2): Draw up a report in respect of the delegation of power.	➡ Not later than by 01 November 2028.

Recital 168 and Article 99(11): Receive and assess from Member States on annual basis the reports about the administrative fines they have issued during that year and about any related litigation or judicial proceedings.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 168 and Article 100: Receive and assess on an annual basis the notification from the EDPS about the administrative fines the EDPS has imposed and of any litigation or judicial proceedings it has initiated.	➡ No concrete time frame to fulfill this task. Rule of Art 113(b) applies, meaning that the related norms apply from 01 August 2025.
Recital 49 and Article 102-110: Assess the interaction of the AI Act with existing NLF laws and – if necessary - amend them.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 174 and Article 112(1): Assess the need for amendment of the list set out in Annex III and of the list of prohibited AI practices laid down in Article 5. Submit the findings of that assessment to the European Parliament and the Council.	➡ To do once a year, starting on 01 August 2025 until the end of the period of the delegation of power (1 August 2029).
Recital 174 and Article 112(2/4): Evaluate and report to the European Parliament and to the Council on the need for amendments extending existing area headings or adding new area headings in Annex III, amendments to the list of AI systems requiring additional transparency measures in Article 50, and amendments enhancing the effectiveness of the supervision and governance system. The reports shall pay specific attention to the status of the financial, technical and human resources of the national competent authorities in order to effectively perform the tasks assigned to them under this Regulation, the state of penalties, in particular administrative fines as referred to in Article 99(1), applied by Member States for infringements of this Regulation, the adopted harmonized standards and common specifications developed to support this Regulation, and the number of undertakings that enter the market after the entry into application of this Regulation, and how many of them are SMEs.	➡ To do by 01 August 2028 and every four years thereafter.
Recital 174 and Article 112(3/5): Submit a report on the evaluation and review of the AI Act to the European Parliament and to the Council. The report shall include an assessment with regard to the structure of enforcement and the possible need for a Union agency to resolve any identified shortcomings. On the basis of	➡ To do by 01 August 2029 and every four years thereafter.

the findings, that report shall, where appropriate, be accompanied by a proposal for amendment of this Regulation. The reports shall be made public. Evaluate the functioning of the AI Office, whether it has been given sufficient powers and competences to fulfil its tasks, and whether it would be relevant and needed for the proper implementation and enforcement of the AI Act to upgrade the AI Office and its enforcement competences and to increase its resources. Submit a report on its evaluation to the Parliament and Council.	
Recital 174 and Article 112(6): Evaluate and report to the European Parliament and to the Council on the progress on the development of standardization deliverables on energy efficient development of GPAI models and assess the need for further measures or actions, including binding measures or actions. The report shall be submitted to the European Parliament and to the Council, and it shall be made public.	➡ To do by 01 August 2028 and every four years thereafter.
Recital 174 and Article 112(7): Evaluate the impact and effectiveness of voluntary codes of conduct to foster the application of the requirements provided for high-risk AI systems in the case of AI systems other than high-risk AI systems and possibly other additional requirements for such AI systems.	➡ To do by 01 August 2028 and every three years thereafter.
Recital 174 and Article 112(8/9): Receive and assess for the purposes of (1) to (7) information from the AI Board, the Member States and national competent authorities.	➡ No concrete time frame to fulfill this task – general task.
Recital 174 and Article 112(10): Submit appropriate proposals to amend this Regulation, in particular taking into account developments in technology, the effect of AI systems on health and safety, and on fundamental rights, and in light of the state of progress in the information society.	➡ No concrete time frame to fulfill this task. General rule of Art 113 applies, meaning that the related norms apply from 01 August 2026.
Recital 174 and Article 112(13): Carry out an assessment of the enforcement of the AI Act and report on it to the Parliament, the Council and EESC, taking into account the first years of application. On the basis of the findings, that report shall, where appropriate, be accompanied by a proposal for amendment of the AI Act with regard to the structure of enforcement and the need for a Union agency to resolve any identified shortcomings.	➡ To do by 01 August 2031.