EU AI Act enforcement timeline

12 July 2024 | 1 Aug 2024 | 2 Feb 2025 | 2 Aug 2025 | 2 Aug 2026 | 2 Aug 2027 | 2 Aug 2030 | 31 Dec 2030

EU AI Act published in the Official Journal of the EU on **12 July 2024**

EU AI Act enters into force **1 Aug 2024** (Art.113)

Rules on subject matter, scope, definitions, AI literacy, and prohibitions come into effect on **2 Feb 2025** (Art.113(a)

Rules on notifications, GPAI models, certain enforcement issues, and penalties come into effect on **2 Aug 2025** (Art.113(b))

The EU AI Act applies, the general grace period for high-risk AI systems ends, and the bulk of the operative provisions come into effect, on **2 Aug 2026** (Arts.111(2) & 113)

Rules on high-risk AI systems under Art.6(1) come into effect on **2 Aug 2027** (Art.113(c))

The grace period for high-risk AI systems intended for use by public authorities ends on **2 Aug 2030** (Art.111(2))

Enforcement does not start on **1 Aug 2024**, but **voluntary compliance** is encouraged (Rec.178)

Any use of AI that is **prohibited** under the EU AI Act must cease by **2 Feb 2025** or face enforcement (Art.113(a))

Analysis: Businesses that develop **GPAI models** are incentivised to place those models on the EU market **before 2 Aug 2025**, in order to gain an extra 2 years before they face enforcement

For GPAI models placed on the EU market **before 2 Aug 2025**, enforcement begins on **2 Aug 2027** (Art.111(3))

For GPAI models placed on the EU market **on or after 2 Aug 2025**, enforcement begins when the GPAI model is placed on the EU market (Art.113(b))

Analysis: Businesses that develop or use **high-risk AI systems** are incentivised to place those AI systems on the EU market **before 2 Aug 2026** (and not significantly change them) to minimise the risk of enforcement

Any **high-risk AI systems** that are placed on the EU market **before 2 Aug 2026**, and are not intended for use by public authorities, face **no enforcement** of the rules on high-risk AI systems (as long as there are no significant changes to those AI systems) (Art.111(2))

For **high-risk AI systems under Art.6(2)** that are placed on the EU market, or are significantly changed, **on or after 2 Aug 2026**, enforcement of the rules on high-risk AI systems begins when the AI system is placed on the EU market (Arts.6(2), 111(2) & 113)

For **high-risk AI systems under Art.6(1)** that are placed on the EU market, or are significantly changed, **on or after 2 Aug 2026,** enforcement of the rules on high-risk AI systems begins on **2 Aug 2027** (Arts.6(1), 111(2) & 113(c))

For **high-risk AI systems** that are placed on the EU market **before 2 Aug 2026**, are not subject to any significant changes after that date, and are intended for use by **public authorities**, enforcement begins on **2 Aug 2030** (Art.111(2))

For AI systems that form part of large-scale IT systems under Annex X, and that are placed on the EU market **before 2 Aug 2027**, enforcement begins on **31 Dec 2030** (Art.111(1))

Key:

- Enforceable compliance obligations
- Voluntary compliance obligations
- No applicable compliance obligations

(Timeline not to scale)

WHITE & CASE

© 2024 White & Case LLP. Attorney Advertising. Prior results do not guarantee a similar outcome.White & Case means the international legal practice comprising White & Case LLP, a New York State registered limited liability partnership, White & Case LLP, a limited liability partnership incorporated under English law and all other affiliated partnerships, companies and entities. This document is prepared for the general information of interested persons. It is not, and does not attempt to be, comprehensive in nature. Due to the general nature of its content, it should not be regarded as legal advice.