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The EU AI Act

Next Steps for Implementation — Post-AI Omnibus Update

The EU AI Act was proposed in April 2021, politically agreed in December 2023 and published in the Official Journal of the EU 12 July 2024. The Digital Omnibus on AI, which introduces targeted amendments to the AI Act, was proposed in November 2025 and entered into force on 27 July 2026.

The AI Act is a keystone regulation for the development and deployment of AI in the EU and around the world.

This resource shows some of the most important dates and milestones for the implementation of the AI Act.

KEY DATES

Entry into force: 1 Aug. 2024 20 days after publication in the Official Journal of the EU	**Entry into application: 2 Aug. 2026** Exceptions exist for specific provisions
The EU AI Office launched the AI Pact, which calls on AI system providers and deployers to voluntarily implement some of the key provisions of the AI Act prior to application.	

ENTRY INTO FORCE: 1 AUG. 2024

2 FEB. 2025

- Prohibitions on unacceptable risk AI went into effect.
- AI literacy requirements went into effect.

27 JULY 2026

- Provisions went into effect on amendments to specific product safety and sectoral EU laws to align them with AI Act requirements.

2 DEC. 2026

- AI watermarking obligations for artificially generated or manipulated content go into effect for AI systems on the EU market before 2 Aug. 2026.
- Prohibition on AI systems designed to generate non-consensual sexualized imagery and child sexual abuse material goes into effect.

2 DEC. 2027

- Obligations go into effect for stand-alone, high-risk AI systems specifically listed in Annex III, including systems in biometrics, critical infrastructure, education, employment, access to essential public services, law enforcement, immigration and administration of justice.

2 AUG. 2028

- Obligations go into effect for high-risk AI systems intended to be used as a safety component of a product or where AI itself is a product that is covered by specific product safety and sectoral EU laws.

BY THE END OF 2030

- Obligations go into effect for certain AI systems that are components of the large-scale information technology systems established by EU law in the areas of freedom, security and justice, such as the Schengen Information System on the EU market, before 2 Aug. 2027.

2 AUG. 2025

- Obligations went into effect for providers of general-purpose AI models
- Deadline for the appointment of member state competent authorities and establishment of the governance framework at the EU level
- Deadline for member states to establish notified bodies and conformity assessment infrastructure
- Deadline for member states to implement rules on penalties, including administrative fines
- Rules on confidentiality went into effect.
- The European Commission began annual review of, and possible amendments to, the list of prohibited AI. Annual reviews are conducted until 2 Aug. 2029.
- The Commission began annual review of, and possible amendment to, the list of high-risk AI systems. Annual reviews are conducted until 2 Aug. 2029.

2 AUG. 2026

- Transparency obligations for artificially generated or manipulated content went into effect for AI systems.
- Rules on penalties for providers of general-purpose AI models went into effect.

2 AUG. 2027

- Obligations go into effect for providers of general-purpose AI models on the EU market before 2 Aug. 2025.
- Member state authorities are to establish at least one operational AI regulatory sandbox.

28 JAN. 2028

- Deadline for notified bodies under EU product safety and sectoral laws to obtain designation for AI Act conformity assessments

2 AUG. 2030

- Obligations go into effect for providers and deployers of high-risk AI systems intended to be used by public authorities.

FURTHER RULEMAKING

» The Commission is empowered to adopt delegated acts on:

- Criteria and use cases for high-risk AI
- Thresholds for general-purpose AI models with systemic risk
- Technical documentation requirements for high-risk AI and general-purpose AI
- Conformity assessments
- EU declaration of conformity
- Incorporating certain AI Act requirements into EU law on machinery safety by 2 Aug. 2028
- Targeted limitations of certain AI Act obligations for products covered by specific product safety and sectoral EU laws by 2 Aug. 2027
- Updates to the list of codes, categories and corresponding types of AI systems under Annex XIV for the purpose of the notification procedure for conformity assessments

The Commission's power to issue delegated acts lasts for an initial period ending 2 Aug. 2029. However, for the delegated acts referenced in the final two bullet points, that authority remains in effect until 27 July 2031. The power is extendable for another five years for both cases.

The Commission is to issue a report on its delegated powers no later than nine months before the end of each five-year period.

» The Commission is empowered to adopt implementing acts on:

- Practical details concerning file access and negotiated disclosure of information in noncompliance proceedings of the AI Office
- AI sandbox lifecycle and governance arrangements
  - » Draft act published on 2 Dec. 2025
- Implementation of AI watermarking obligations for artificially generated or manipulated content, if the existing code of practice is deemed inadequate
- Suspending, restricting or withdrawing the designation of a notified body
- Common specifications in the absence of a harmonized standard
- Implementation of obligations for general-purpose AI models providers, if the existing code of practice is deemed inadequate
- Detailed elements of the real-world testing plan of high-risk AI systems
- Establishment of a scientific panel of independent experts
  - » Published on 10 March 2025
- Arrangements and conditions for the AI Office's evaluations of general-purpose AI models
- Arrangements and safeguards for proceedings that may lead to fines for providers of general-purpose AI models

GUIDANCE AND SUPPORT

» The Commission is empowered to issue guidance on:

- High-risk AI incident reporting by 2 Aug. 2025.
  - » Delayed draft guidelines published on 2 Sept. 2025
- Practical implementation of high-risk AI classification rules with a list of practical examples of high-risk and not high-risk use cases by 2 Feb. 2026
  - » Delayed draft guidelines published on 19 May 2026
- Prohibited AI practices
  - » Published on 4 Feb. 2025
- Application of the definition of an AI system
  - » Published on 6 Feb. 2025
- Scope of obligations for providers of general-purpose AI models
  - » Published on 18 July 2025
- Practical implementation of transparency obligations
  - » Published on 20 July 2026
- Requirements for high-risk AI systems "when deemed necessary"
- Obligations of deployers of high-risk AI systems, "when deemed necessary"
- Practical implementation of rules on substantial modification, "when deemed necessary"
- Responsibilities along the AI value chain of a high-risk AI system, "when deemed necessary"
- Relationship of the AI Act and its enforcement with other EU laws "when deemed necessary"
- The targeted limitations of certain AI Act obligations for products covered by specific product safety and sectoral EU laws by 1 Aug. 2027
- The post-market monitoring plan, including a template, by 2 Sept. 2027

The AI Office facilitated the drawing up of Codes of Practice covering transparency, copyright and safety and security for providers of general-purpose AI models. It was published on 10 July 2025.

» The Commission shall:

- Establish a simplified technical documentation form for small and medium-sized enterprises and small mid-cap enterprises
- Support providers and deployers of AI systems in fulfilling their AI literacy obligations

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