AI Act – Important dates

HUB FRANCE IA

EAIF

OBJECTIVES

- Delete or modify prohibited AIS
- Guaranteeing a sufficient level of AI expertise
- Bringing the new GPAIm into compliance
- Bringing HR AIS into compliance
- Bringing all GPAIm into compliance

IMPORTANT DATES

- **12th July 2024** – Publication in OJEU
- **2nd August 2024** – Entry into force of the AI Act
- **2nd February 2025** – Provisions on **prohibited AIS** applicable
- **2nd May 2025** – Codes of practice for GPAIm providers
- **2nd August 2025** – GPAIm compliance provisions **applicable**
- **2nd August 2026** – Provisions on **high-risk AIS (Annex III)** applicable
- **2nd August 2027** – Provisions **on high-risk AIS (Annex I)** applicable and on **GPAIm put on the market before 1st August 2025** (111.3) applicable
- **2nd August 2028** – Provisions on **AIS which are components of large-scale information systems (Annex X) placed on the market before 1 August 2027 (111.1)** applicable

APPLICATION SPECIFICS

- GPAIm put on the market before this date benefit from an additional period of 24 months
- High-risk AIS placed on the market before this date are subject to the AI Act only if they have undergone substantial changes to their design (111.2)
- High-risk AIS intended for use by public authorities (111.2) must be brought into compliance by this date.

RECOMMENDATIONS BY THE HUB FRANCE IA

- Awareness-raising/training initiatives
- Build a pool of experts and establish governance
- Operationalising compliance
  - Mapping of your AIS
  - Mapping your GPAIm
  - Qualifying the risk level of systems and models and the roles of the organisation
  - Listingof applicable obligations
- Documenting compliance

Expected complements

Delegated or implementing acts

- + 9 months: codes of practices for GPAIm suppliers
- + 12 months: annual review of the list of banned AIS
- + 18 months: model post-marketing surveillance plan
- + 24 months: review of the list of HR AIS.

The Commission must also draw up :

- provisions for setting up a Scientific Expert Group procedures for implementing and developing regulatory sandboxes details of the test plan under real conditions

Harmonised standards

- Risk management
- Data quality and governance Logging
- Transparency
- Human supervision Accuracy
- Robustness
- Cybersecurity
- Quality management
- Conformity assessment

Publication scheduled for 2nd half 2025

For Member States

- + 3 months: MS appoints the authority responsible for protecting fundamental rights
- + 12 months: identification and notification of the competent national authorities (art. 7) in the Member States
- + 24 months: Member States inform the Commission of the penalty system chosen (art. 99)
- + 24 months: operationalisation of at least one regulatory sandbox

GLOSSARY

AIS= AI System
OJEU= Official Journal of the European Union
GPAIm = General purpose AI model
MS : Member state
HR = High Risk
NCA = National Competent Authority