NAVIGATING THE EU AI ACT:

A comprehensive meta-guide to leading tools

By Theodore Christakis, Shadée Pinto and Pankaj Raj

NAVIGATING THE EU AI ACT:
A COMPREHENSIVE META-GUIDE TO LEADING TOOLS

The European Union's Artificial Intelligence Regulation ("AI Act") marks a pivotal step in regulating AI technologies across diverse sectors. As its reach grows, academics, policymakers, and industry professionals need straightforward, up-to-date resources to understand and apply these rules effectively. This meta-guide assembles and summarizes some among the most valuable tools developed by researchers, providing a single, convenient entry point for visualizing the Act's provisions and simplifying its implementation. By compiling these resources in one place, we aim to empower you to navigate the complexities of the AI Act with clarity and confidence.

Throughout the negotiation process and leading up to the entry into force of the AI Act, numerous practitioners, international institutions, and organizations have published tools designed to facilitate understanding of the legislation. Our toolbox aims to bring together some of the most useful of these resources—particularly charts—organized into several categories to help readers navigate the Act's complexities with greater ease.

I. Final text of the AI Act with Interactive ToC

Tool no. 1: Final text of the AI Act with interactive ToC

Following the publication of the AI Regulation in the Official Journal of the EU, the MIAI AI-Regulation Chair published a pdf with the final text, as it appears in the Official Journal, to which we have introduced a particularly useful interactive Table of Contents. Our pdf intends to become a particularly useful tool for all practitioners and AI Act nerds. It allows a comprehensive overview of the AI Act's structure, enabling users to "click" and be directly transferred to different Titles, Chapters, and Articles, and then click again to get back to the Table of Contents.

Pankaj Raj, a Research Fellow with the AI-Regulation.com Chair, prepared this final interactive Table of Contents under the supervision of Professor Theodore Christakis.

II. Cheat Sheets of the AI Act

The AI Act aims to ensure the responsible development and deployment of safe, reliable AI systems by both private and public entities across the European Union ("EU"). Having entered into force in August 2024, it introduces new obligations that will affect operators at every stage of the AI value chain. Additional provisions will take effect in the coming months and years, making it critical for professionals, policymakers, and researchers to grasp the Act's requirements from the outset.To help stakeholders quickly understand and apply these rules, a variety of experts and institutions have created concise "cheat sheets" that break down the Act's key provisions, compliance timelines, and implementation tips. Below, we highlight two among the most comprehensive and accessible resources, designed to help you navigate the AI Act at a glance.

Tool no. 2: Overview of the AI Act

This tool created by Oliver Patel in December 2023 is available both on the International Association of Privacy Professionals ("IAPP") website and his LinkedIn account. The cheat sheet summarizes the key information about the AI Act and focuses on the classification of AI systems, especially on prohibited AI systems, high risks AI systems and general purpose AI systems. It provides a clear and easy understanding of the Act and an explanation of its risk-based approach for both professional and non-experts.

Tool no. 3: Overview of the AI Act

This tool created by David Futter, Aimi Gold and William Barrow in their article "The EU AI Act is here - What you need to know and what to do next" published in February 2024, is available on Ashurst website. The cheat sheet provides a broader presentation of the AI Act with more in-depth insights. It lists the key points of the text (penalties, responsibility, governance, compliance, support for innovation and implementation). This content is useful for an informed audience looking for a single page executive summary of the AI Act.

Key takeaways

Scope

- Applies across the AI value chain to providers (i.e. developers and companies instructing development), importers, distributors, manufacturers and deployers (i.e. business users) of certain AI systems
- Businesses and individuals outside of the EU that "first place on the market" or first install AI systems (or outputs from AI systems) into the EU will be caught
- Obligations differ depending on what role is undertaken in the AI value chain - however, the focus is on providers and deployers

Risk categories for AI systems

- The higher the risk, the more strict the rules
- Certain AI systems which pose an "unnacceptable risk" due to the threat they pose to people are prohibited
- "High-risk" AI systems are subject to the most onerous requirements
- Some AI systems, including those which directly interact with people, are subject to transparency obligations
- Where an AI system does not meet any of the above risk categories it is not subject to the AI Act - the EU anticipates that most AI systems will fall into this category

Fines/Liability

- €35m or 7% of global annual turnover for breaching prohibited AI system rules
- €15m or 3% of global annual turnover for violations of other obligations
- €7.5m or 1% of global annual turnover for supplying incorrect information
- As the AI Act does not contain provisions on liability for the purposes of damages claims and compensation for individuals harmed by AI, two new, complementary liability regimes have been proposed by the EU Commission: the EU AI Liability Directive and the revised EU Product Liability Directive

Deadlines

Two year transition period for compliance following entry into force, except...

- Prohibited AI Systems will be banned from 6 months after AI Act enters into force
- GPAI model rules will apply 12 months after the AI Act enters into force

General purpose AI models

- GPAI models (i.e. foundation models) are subject to a set of specific rules
- GPAI models posing a "systemic risk" are subject to additional more stringent requirements

Pro-innovation provisions

- Member States are required to establish at least one AI regulatory sandbox at a national level (joint establishment between Member States will satisfy this requirement)
- Member States are required to support AI SMEs and start-ups, including by organising AI Act awareness raising and training activities

Governance

- Enforcement and implementation of the AI Act at a national level will be undertaken by authorities designated by the relevant Member State
- An EU AI Office will deal with standard setting, enforcement and administrative tasks at an EU level
- An EU AI Board will facilitate the consistent and effective application of the AI Act
- A scientific panel of independent experts with "up-to-date scientific or technical expertise" in AI is to be established to support with enforcement of the AI Act

Tool no. 4: Overview of the AI Act

This is the first page of a comprehensive tool created by Andrew Folks in his publication "EU AI Act: 101" published in July 2024 and available on the IAPP website. The chart briefly explains the purpose of the Act and the key changes brought by it, as well as the key challenges posed by it.

EU AI Act: 101

By IAPP Westin Fellow Andrew Folks

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Purpose of the AI Act

→ To lay down a comprehensive legal framework for the development, marketing and use of AI in the EU in conformity with EU values.	→ To promote the uptake of human-centric and trustworthy AI while ensuring a high level of protection of health, safety and fundamental rights, including democracy, the rule of law and environmental protections.	→ To support innovation while mitigating harmful effects of AI systems in the EU.

Key changes the AI Act will bring	Key challenges posed by the AI Act	Important upcoming dates
→ Classifies AI systems by level of risk and mandate development, deployment, and use requirements, depending on the risk classification. → Establishes the AI Office to oversee general-purpose AI models, contribute to fostering standards and testing practices, and enforce rules across member states; the AI Board to advise and assist the European Commission and member state competent authorities; the Advisory Forum to advise and provide technical expertise to the board and the Commission; and Scientific Panel of independent experts to support implementation and enforcement of the act. → Prohibits unacceptable risk AI. → Introduces heightened technical and documentary requirements for high-risk AI systems, including fundamental rights impact assessments, and requires conformity assessments. → Requires human oversight and data governance.	→ Protecting the fundamental rights to the protection of personal data, private life and confidentiality of communications through sustainable and responsible data processing in the development and use of AI systems. → Fostering innovation and competitiveness in the AI ecosystem, and facilitating its development. → Understanding the interplay between the AI Act and existing rules applicable to AI, including on data protection, intellectual property and data governance. → Navigating the complex supervision and enforcement stakeholder map that is forming. → Designing and implementing appropriate multidisciplinary governance structures within organizations.	→ The AI Act shall enter into force 1 Aug. 2024, following its publication in the Official Journal of the European Union 12 July 2024. It will be fully applicable 24 months after entry into force, with a graduated approach as follows: • 2 Feb. 2025: Prohibitions on unacceptable risk AI become applicable. • 2 Aug. 2025: Obligations for general-purpose AI governance become applicable. • 2 Aug. 2026: All rules of the AI Act become applicable, including obligations for high-risk systems. • 2 Aug. 2027: Obligations for all other high-risk systems become applicable.

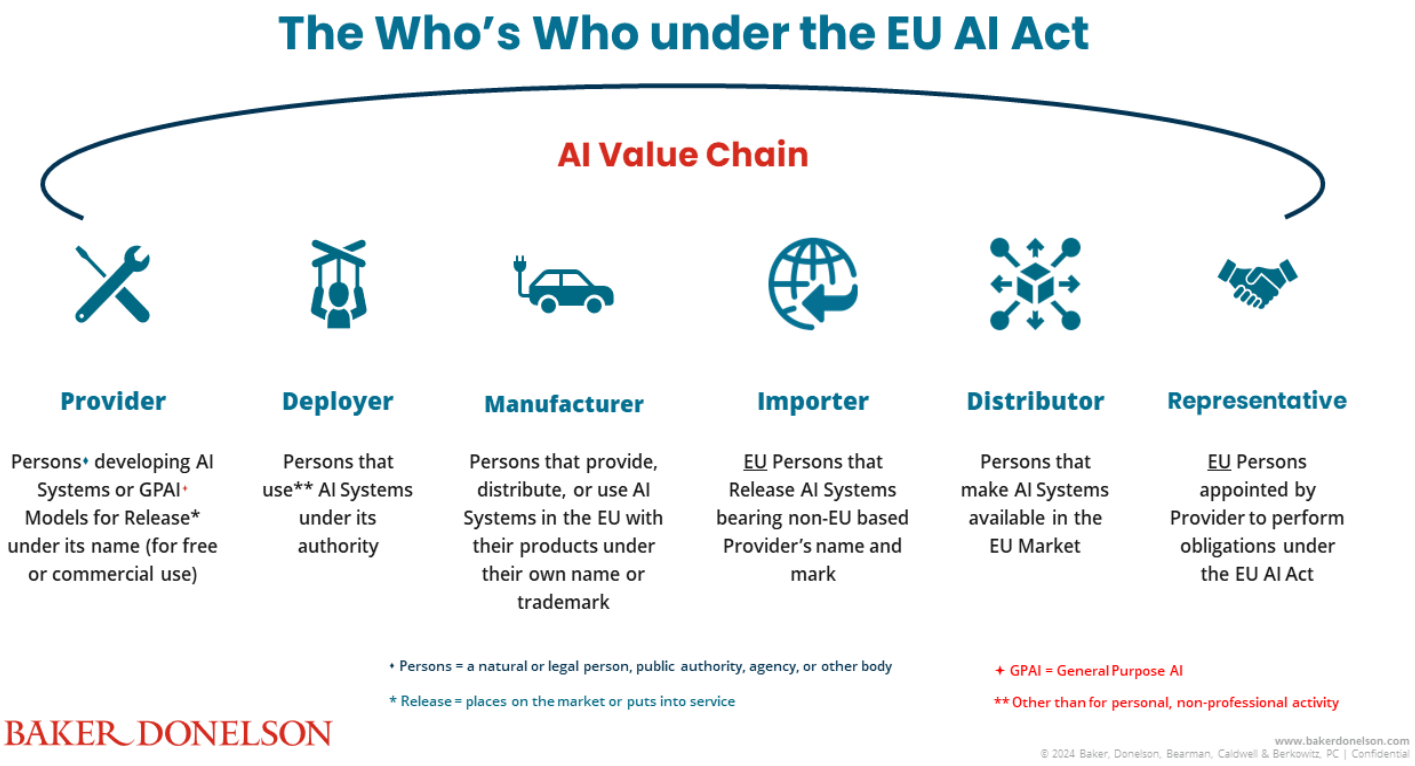
Additional resources

→ IAPP AI Governance Center → EU AI Act: Next Steps for Implementation → EU AI Act Cheat Sheet → European Commission's AI – Questions and Answers

Updated July 2024.
iapp.org

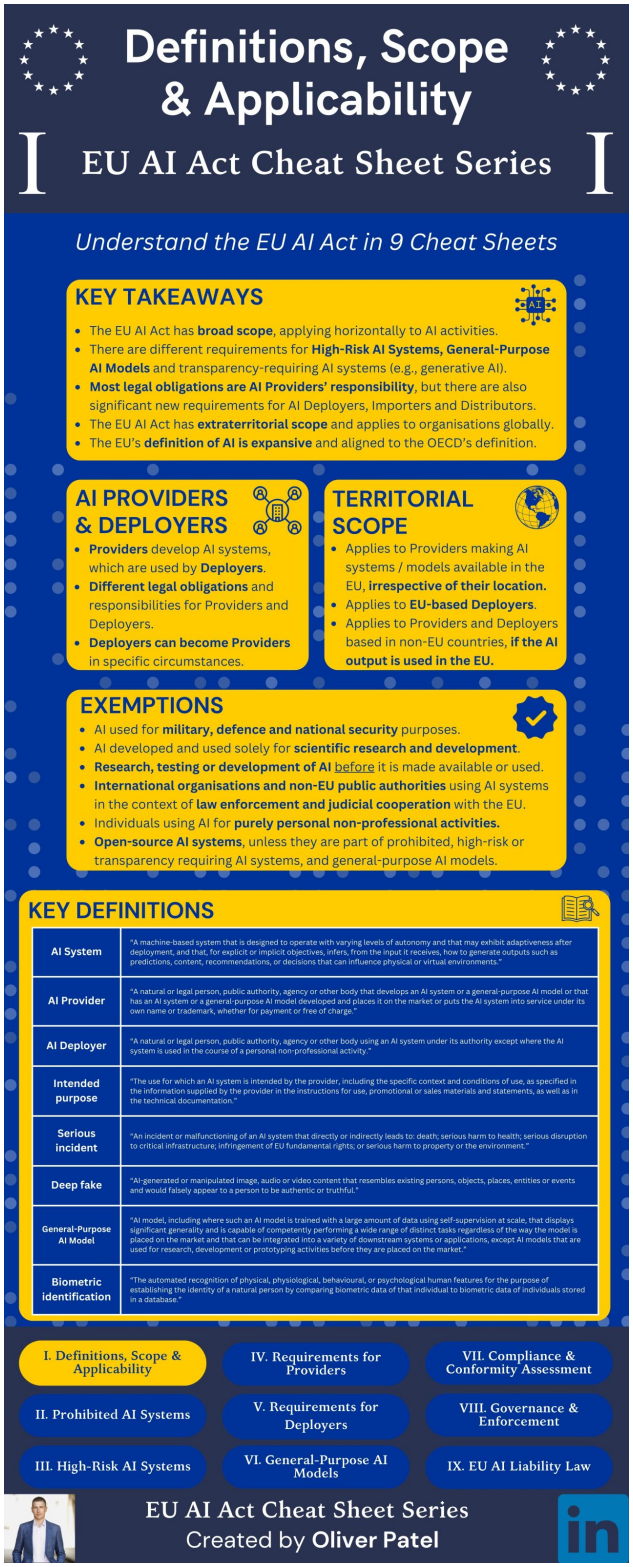
Tool no. 5: Scope of the AI Act, the actors

As the AI Act applies to a wide variety of actors from the AI systems value chains, it is key for the operators to identify clearly their role and classification under the Act. This diagram published in the article "Who's Who under the EU AI Act: Spotlight on Key Actors" wrote by Vivien F. Peaden in March 2024 is available on Baker Donelson's website. This tool offers a visual representation of the scope of the regulation, by focusing on the entities subject to the regulation, as mentioned in Article 2. A brief definition of these entities, accompanied by a pictogram, is proposed.



Tool no. 6: Scope of the AI Act

This cheat sheet created by Oliver Patel in July 2024 is available on his LinkedIn account. This tool offers a broad presentation of the scope of the regulation. It includes a definition of the systems and entities subject to the regulation, as well as the territorial scope and exemptions.

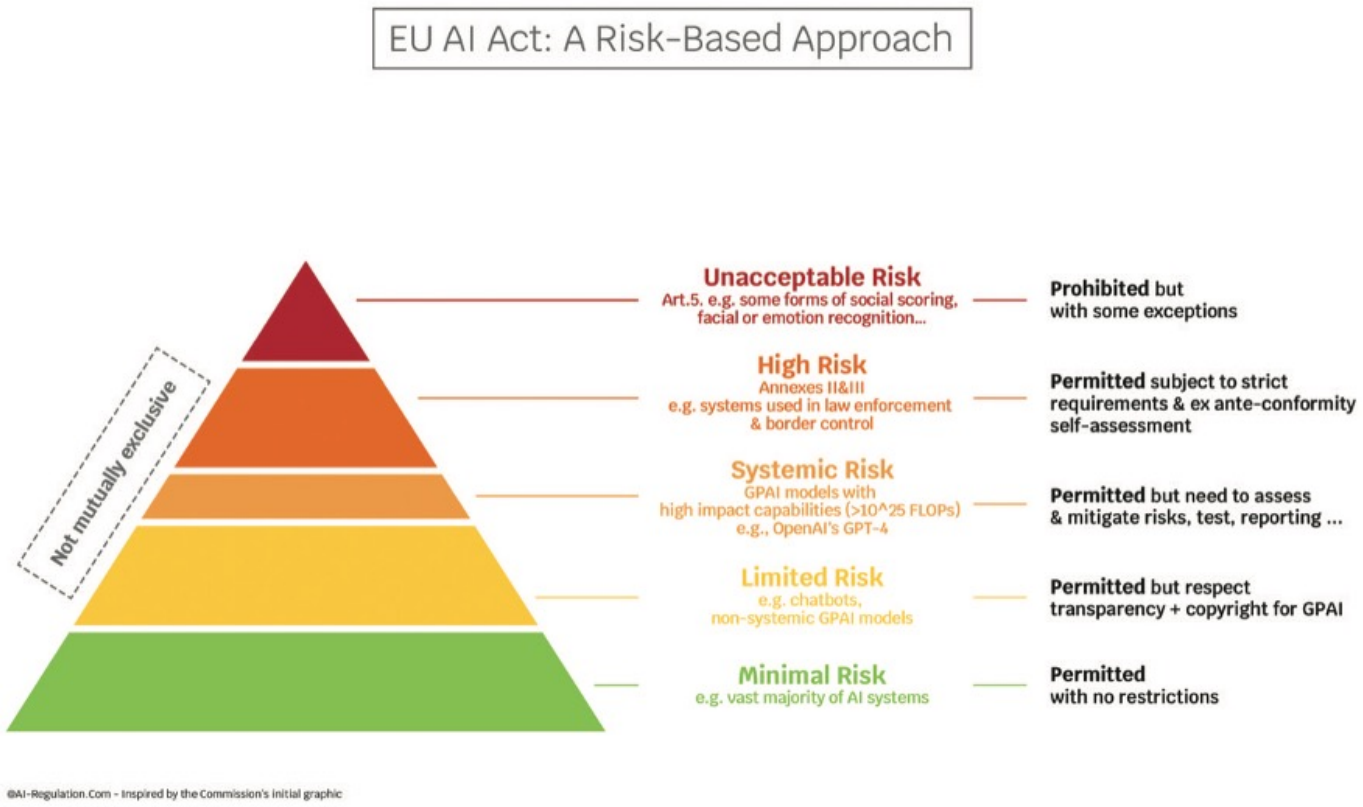


III. Classification of AI systems and models

The AI Act does not regulate AI systems (i.e., products and services that are powered by AI) as such. Instead, it focuses on the specific use cases that pose varying levels of risk. Employing a "risk-based approach," the Act classifies AI applications into categories ranging from "unacceptable risk" to "minimal risk," assigning different obligations and compliance requirements to each level. Consequently, it is crucial for AI operators and developers to determine where their systems fall within this spectrum. Correct classification ensures that they apply the appropriate rules and measures—whether more stringent or less restrictive—based on the potential impact and risk profile of their AI solutions.

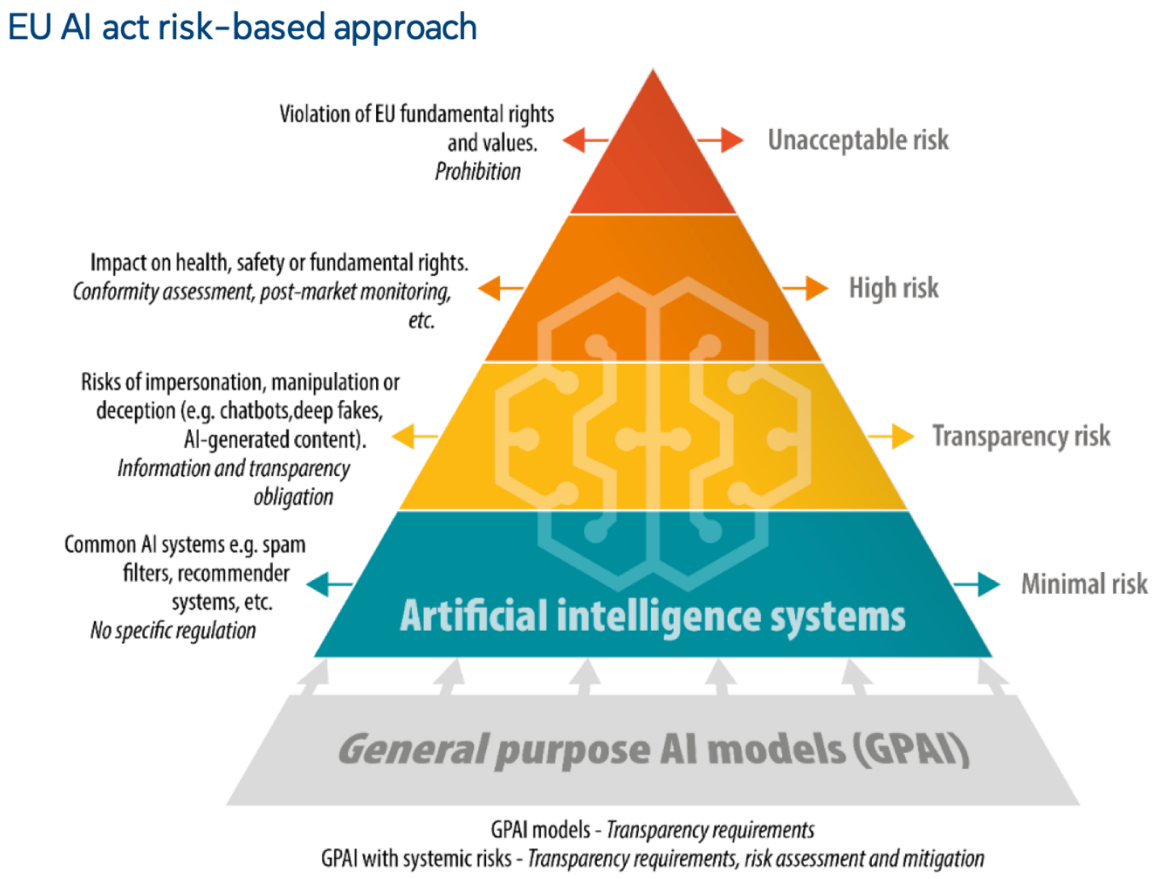
Tool no. 7: Classification of AI systems

This tool created by Theodore Christakis and Theodoros Karathanasis in their article "Tools for navigating the EU AI act: (2) Visualisation pyramid", published in March 2024, is available in the AI Regulation.com website. The authors explain that their intention was to offer "a comprehensive visualisation pyramid designed to illuminate the intricate logic and core content of the EU AI Act in a single, intuitive graphic". This tool on the risk-based classification system of the AI Act, relates the level of risk to the obligations with which players in the AI value chain will have to comply. The authors argue that they have adopted a bold approach, by integrating the "systemic" risk tier into the current pyramid structure in order to harmonize it with the overarching logic of the AI Act and uphold its conceptual coherence.



Tool no. 8: Classification of AI systems

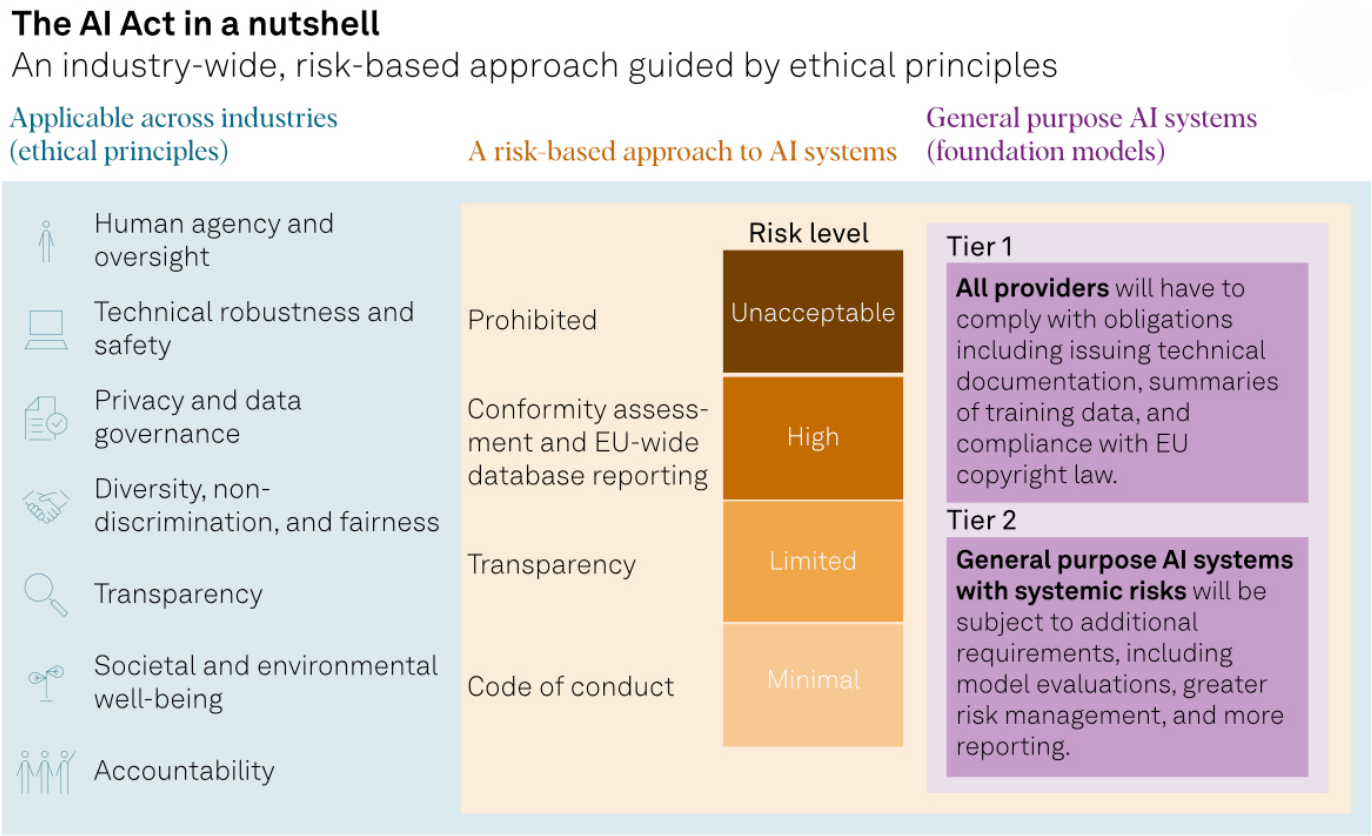
This tool is another pyramid created by Tambiama Madiega from the European Parliament Research Service in a Briefing related to the AI Act published in September 2024 on the European Parliament's website. The pyramid presents the risk-based classification system by connecting each level of risk with the associated obligations and examples. In this version, the author dissociates general purpose AI models and AI systems by addind a separated layer under the main pyramid of risks.



Data source: European Commission.

Tool no. 9: Classification of AI systems

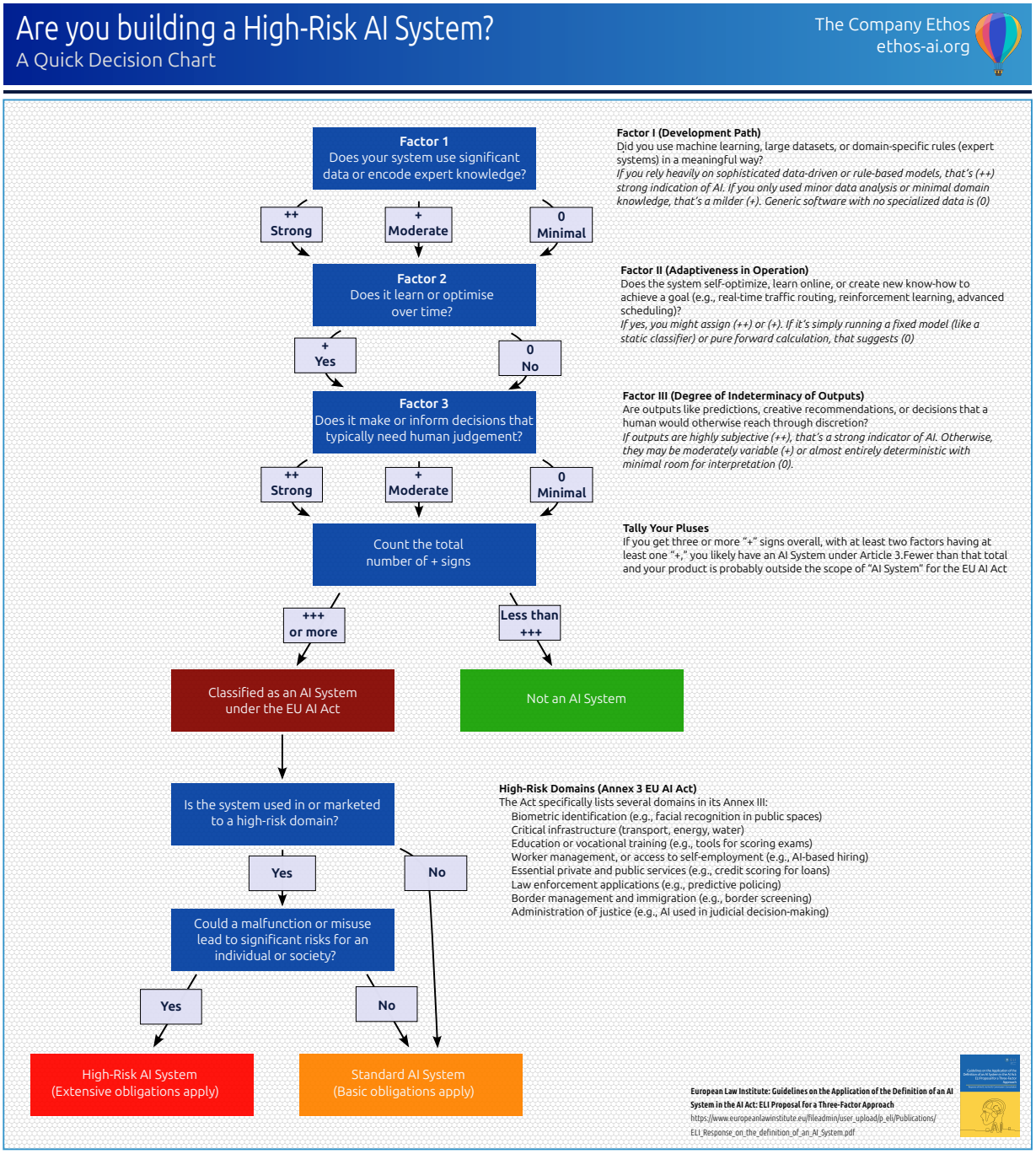
This chart created by Standard & Poor's Financial Services is part of the article "Your Three Minutes In AI: The EU AI Act Could Become A Global Benchmark" published on S&P Global's website. It proposes a visualisation of the risk-based approach of the AI Act without following the pyramid paradigm. It also introduces a series of "ethical principles" and the distinctions between general-purpose AI models.



Sources: EU AI Act; S&P Global Ratings.

Tool no. 10: Self-assessment AI system risks classification

This tool created by James Kavanagh in the article "Are you building a High-Risk AI System?" in January 2025 is available on the website Ethos. Leveraging research from the European Law Institute, the chart introduces a first-level assessment method to guide providers of AI systems and actors of the AI value chain through the qualification of their AI system. It favours a pedagogical and illustrative approach that breaks down the qualification criterias for a high-risk AI system.



IV. Operators' obligations

The regulation requires operators to comply with a series of obligations that vary according to the risk level of the AI model or system and the type of operator, over the entire product lifecycle.

Tool no. 11: Operators' obligations, AI systems-based approach

This tool created by the Austrian Regulatory Authority for Broadcasting and Telecommunications in the publication "Provider obligations" is available on their website. This chart presents the obligations with which operators must comply, according to the classification of their system.

AI Act: Provider obligations

The scope of obligations decreases according to the risk classification of the AI system/AI model

	High risk AI system	GPAI model systemic risk	GPAI model	AI system limited risk	AI system minimal risk
AI literacy	Art. 4	Art. 4	Art. 4	Art. 4	Art. 4
Transparency towards downstream actors	Art. 13	Art. 55 (1)	Art. 53 (1) b	Art. 50 (1), (2)	
Data requirements	Art. 10	Art. 55 (1)	Art. 53 (1) c, d		
Technical documentation	Art. 11	Art. 55 (1)	Art. 53 (1) a		
Cooperation with authorities	Art. 21	Art. 55 (1)	Art. 53 (3)		
Appointment of authorized representative (if third country)	Art. 22	Art. 55 (1)	Art. 54		
Risk management	Art. 9	Art. 55 (1) a, b			
Accuracy, robustness and cybersecurity	Art. 15	Art. 55 (1) d			
Registration resp. notification obligations	Art. 49	Art. 52 (1)			
Reporting obligations to authorities	Art. 73	Art. 55 (1) c			
Record-keeping	Art. 12				
Implementation of human oversight tools	Art. 14				
Labelling requirements	Art. 16 b				
Ensuring accessibility requirements	Art. 16 l				
Quality management	Art. 17				
Documentation and log-keeping	Art. 18, 19				
Corrective actions	Art. 20				
Conformity assessment procedure, -declaration, -marking	Art. 43, 47, 48				

AI Service Desk ai.rtr.at **RTR**

Tool no. 12: Operators' obligations, operators-based approach

This tool created by Müge Fazlioglu is part of a toolbox designed to help understand the EU AI Act Compliance published in October 2024 and available on the IAPP's website. The publication includes several tables aiming to "illustrate the articles of the EU AI Act that apply to each operator across three broad classes: high-risk AI systems, AI systems and general-purpose AI models". As explained, "some requirements apply only to certain operators, i.e., providers, deployers, product manufacturers, authorized representatives, importers and distributors, while some apply to multiple or all operators". Checkmarks in the table "indicate the operators to which the article is of primary relevance, recognizing it may still be applicable or relevant to others not explicitly referenced".

AT-A-GLANCE

EU AI Act Compliance Matrix

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By IAPP Principal Researcher, Privacy Law and Policy, Müge Fazlioglu CIPP/E, CIPP/US

This resource is intended to aid in compliance with the EU AI Act by providing a high-level overview of its key requirements for organizations. The table below illustrates the articles of the EU AI Act that apply to each operator across three broad classes: high-risk AI systems, AI systems and general-purpose AI models. The checkmarks indicate the operators to which each article is of primary relevance, recognizing it may still be applicable or relevant to others not explicitly referenced. The analysis herein is based on the EU AI Act published 13 June 2024 in the Official Journal of the European Union. View a more in-depth version of this resource at iapp.org.

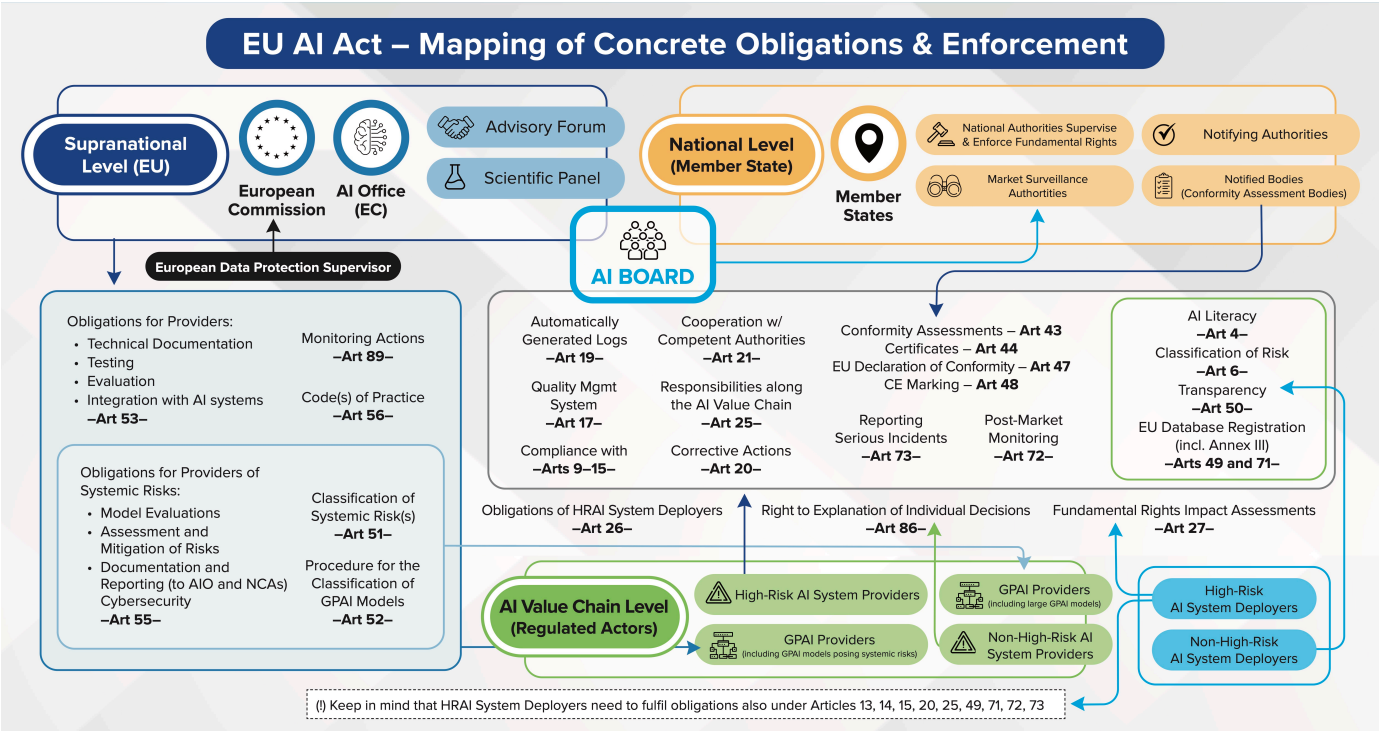
	THE OPERATORS					
	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
HIGH-RISK AI SYSTEMS						
Article 6: Classification rules for high-risk AI systems	✓					
Article 8: Compliance with the requirements	✓					
Article 9: Risk management systems	✓					
Article 10: Data and data governance	✓					
Article 11: Technical documentation	✓					
Article 12: Record-keeping	✓					
Article 13: Transparency and provision of information to deployers	✓	✓		✓		
Article 14: Human oversight	✓	✓				
Article 15: Accuracy, robustness and cybersecurity	✓					
Article 16: Obligations of providers of high-risk AI systems	✓					
Article 17: Quality management system	✓					
Article 18: Documentation keeping	✓			✓		
Article 19: Automatically generated logs	✓					
Article 20: Corrective actions and duty of information	✓	✓		✓	✓	✓
Article 21: Cooperation with competent authorities	✓					
Article 22: Authorized representatives of providers of high-risk AI systems	✓			✓		
Article 23: Obligations of importers	✓			✓	✓	
Article 24: Obligations of distributors	✓				✓	✓
Article 25: Responsibilities along the AI value chain	✓	✓	✓		✓	✓
Article 26: Obligations of deployers of high-risk AI systems	✓	✓			✓	✓
Article 27: Fundamental rights impact assessments for high-risk AI systems		✓				
Article 41: Common specifications	✓					
Article 43: Conformity assessments	✓					
Article 44: Certificates	✓					
Article 47: EU declaration of conformity	✓					
Article 48: CE marking	✓					
Article 49: Registration	✓	✓		✓		
Article 71: EU database for high-risk AI systems listed in Annex III	✓	✓		✓		
Article 72: Post-market monitoring by providers and post-market monitoring plan for high-risk AI systems	✓	✓				
Article 73: Reporting of serious incidents	✓	✓				
Article 86: Right to explanation of individual decision-making		✓				
AI SYSTEMS						
Article 4: AI Literacy	✓	✓				
Article 49: Registration	✓			✓		
Article 50: Transparency obligations for providers and users of certain AI systems	✓	✓				
Article 71: EU database for high-risk AI systems listed in Annex III	✓	✓		✓		
GENERAL-PURPOSE AI MODELS						
Article 41: Common specifications	✓					
Article 51: Classification of general-purpose AI models as general-purpose AI models with systemic risk	✓					
Article 52: Procedure	✓					
Article 53: Obligations for providers of general-purpose AI models	✓					
Article 54: Authorized representatives of providers of general-purpose AI models	✓			✓		
Article 55: Obligations for providers of general-purpose AI models with systemic risk	✓					
Article 56: Codes of practice	✓					
Article 89: Monitoring actions	✓					

With a focus on the EU AI Act's requirements for various operators, this table excludes articles that enumerate the powers of the member states, European Commission, AI Office, market surveillance authorities and all other EU institutions, bodies, offices and agencies.

Updated October 2024.
iapp.org

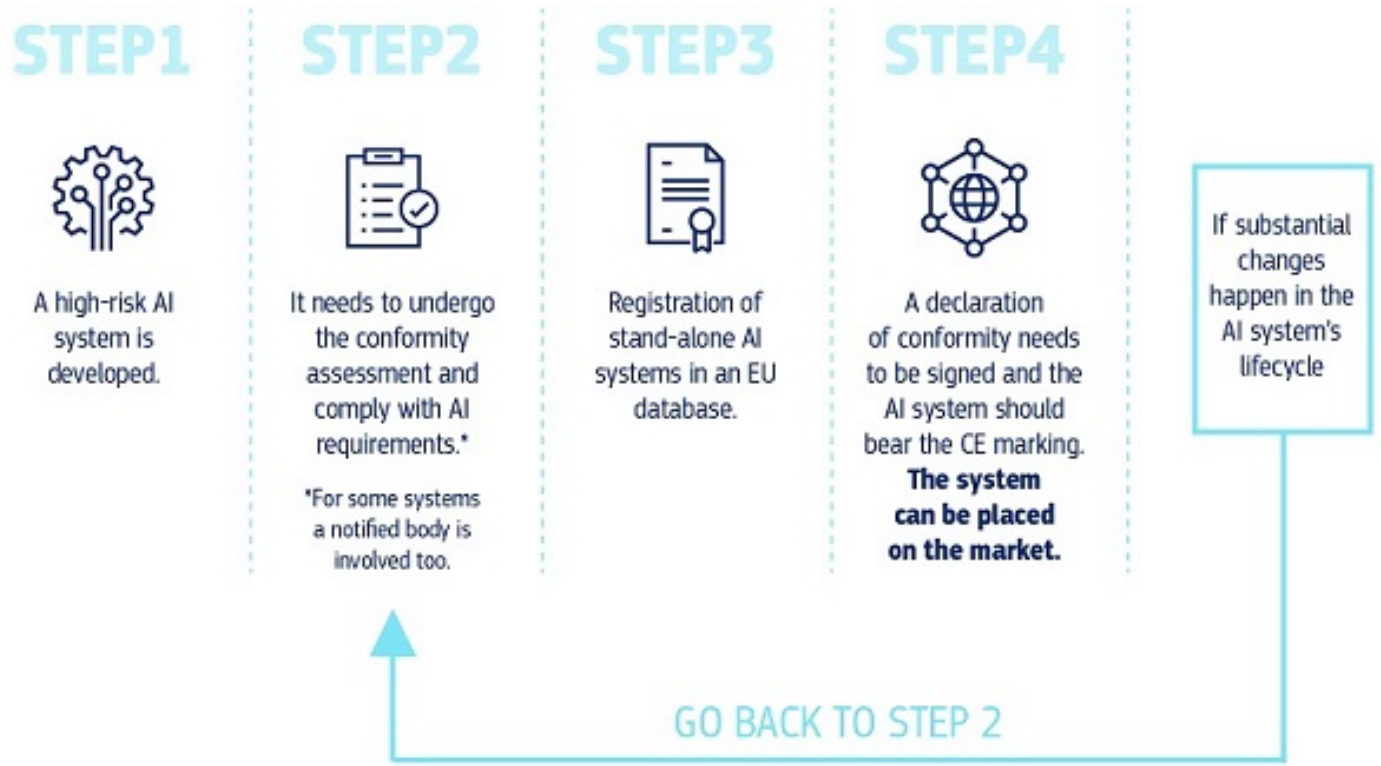
Tool no. 13: Operators' obligations

This tool created by Future of Privacy Forum is available in their Resources on the EU AI Act published in December 2024. This diagram presents the obligations with which operators must comply and the authorities responsible for enforcing them.



Tool no. 14: Conformity assessment process

This tool created by the European Commission is available in their page related to the AI Act. The chart presents the conformity assessment process used to prove compliance with obligations for high-risk AI systems.

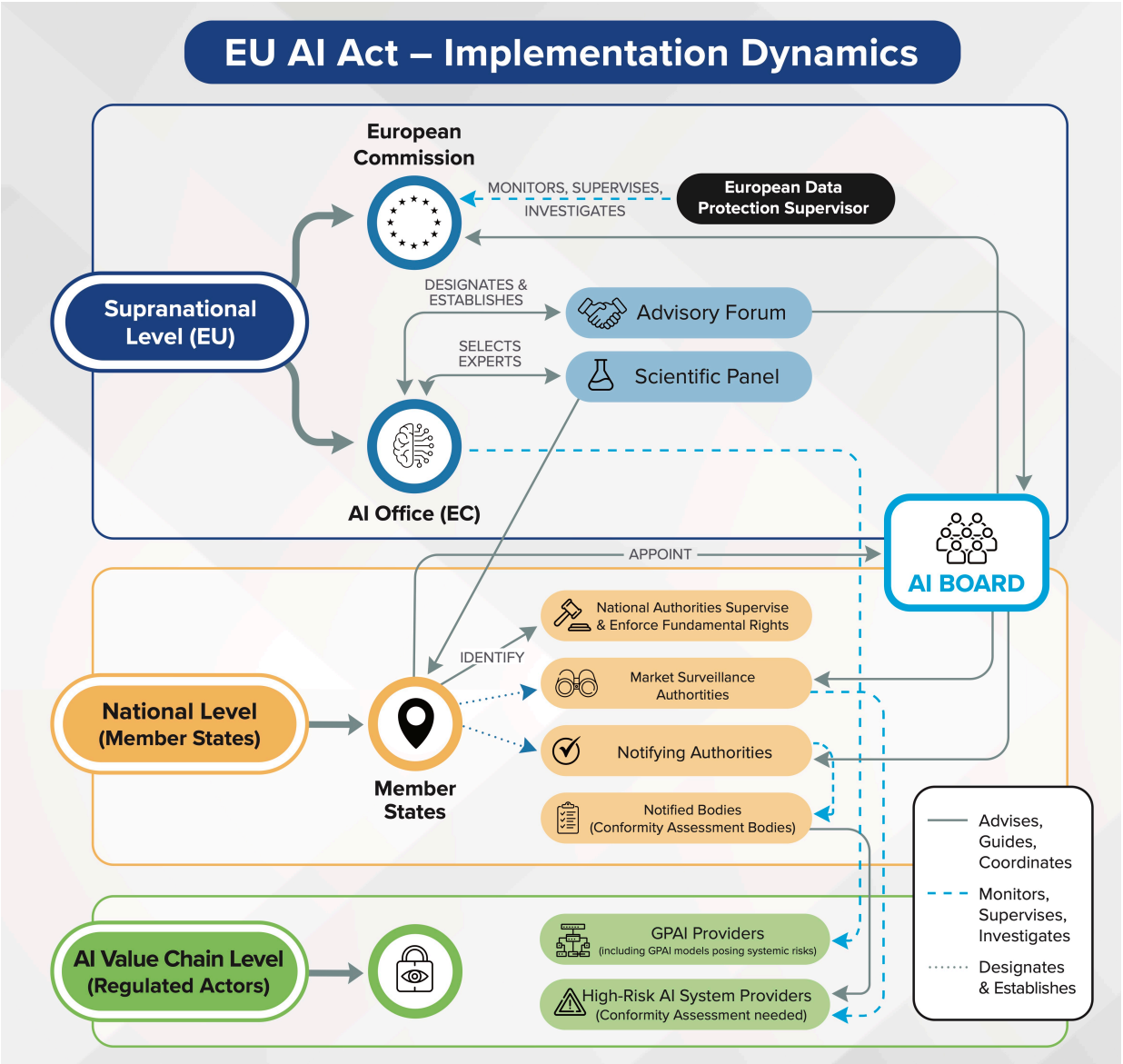


V. Governance framework

To implement and ensure proper application of the AI Act, multiple governing bodies have been or are projected to be established at both national and supranational levels. Each entity has its own distinct yet complementary mission, scope, and responsibilities. To help stakeholders fully understand this governance framework and visualize how these bodies interact, we have identified several tools that clarify their roles and relationships.

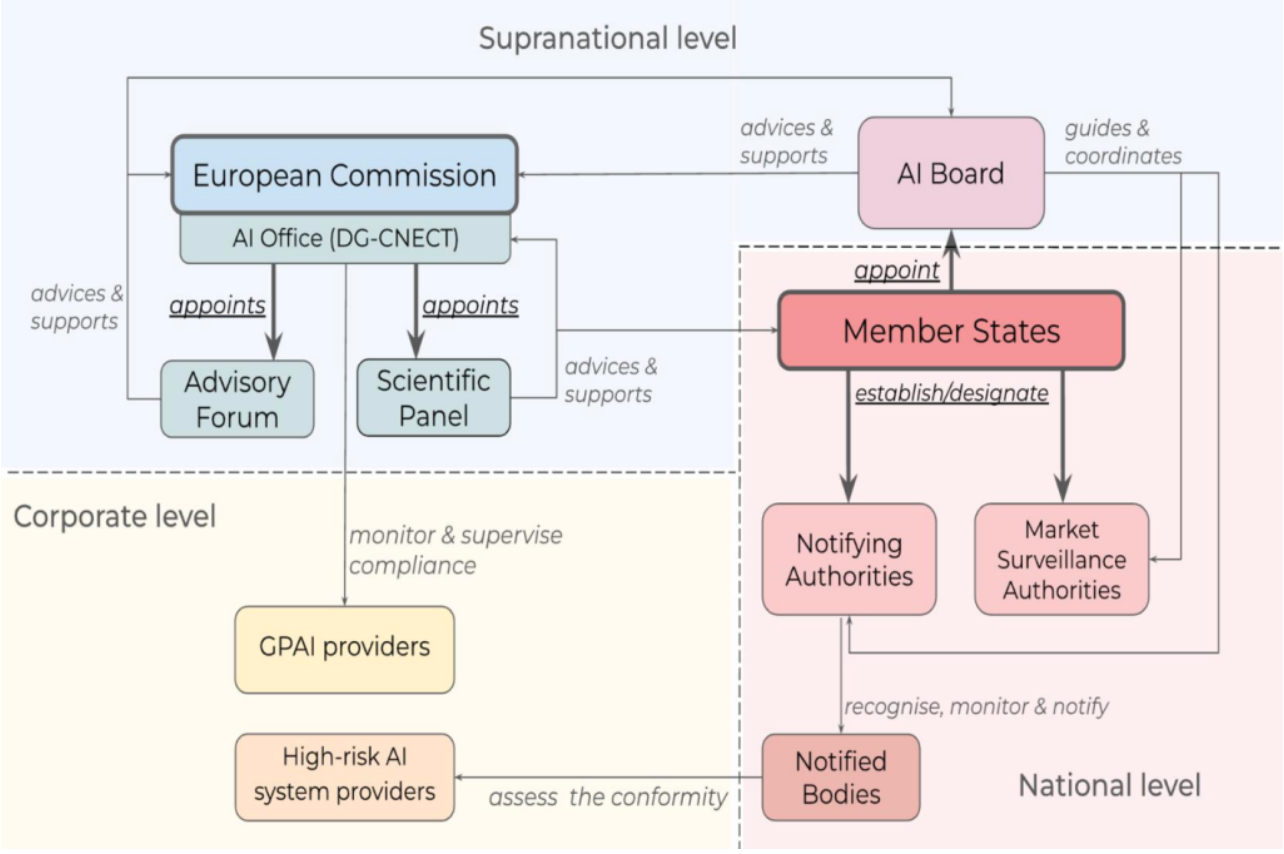
Tool no. 15: Governance framework

This tool created by Future of Privacy Forum is to be found in their resources on the EU AI Act. This chart permits to visualise at a glance the bodies responsible for implementing the AI Act at different levels and the interactions between them.



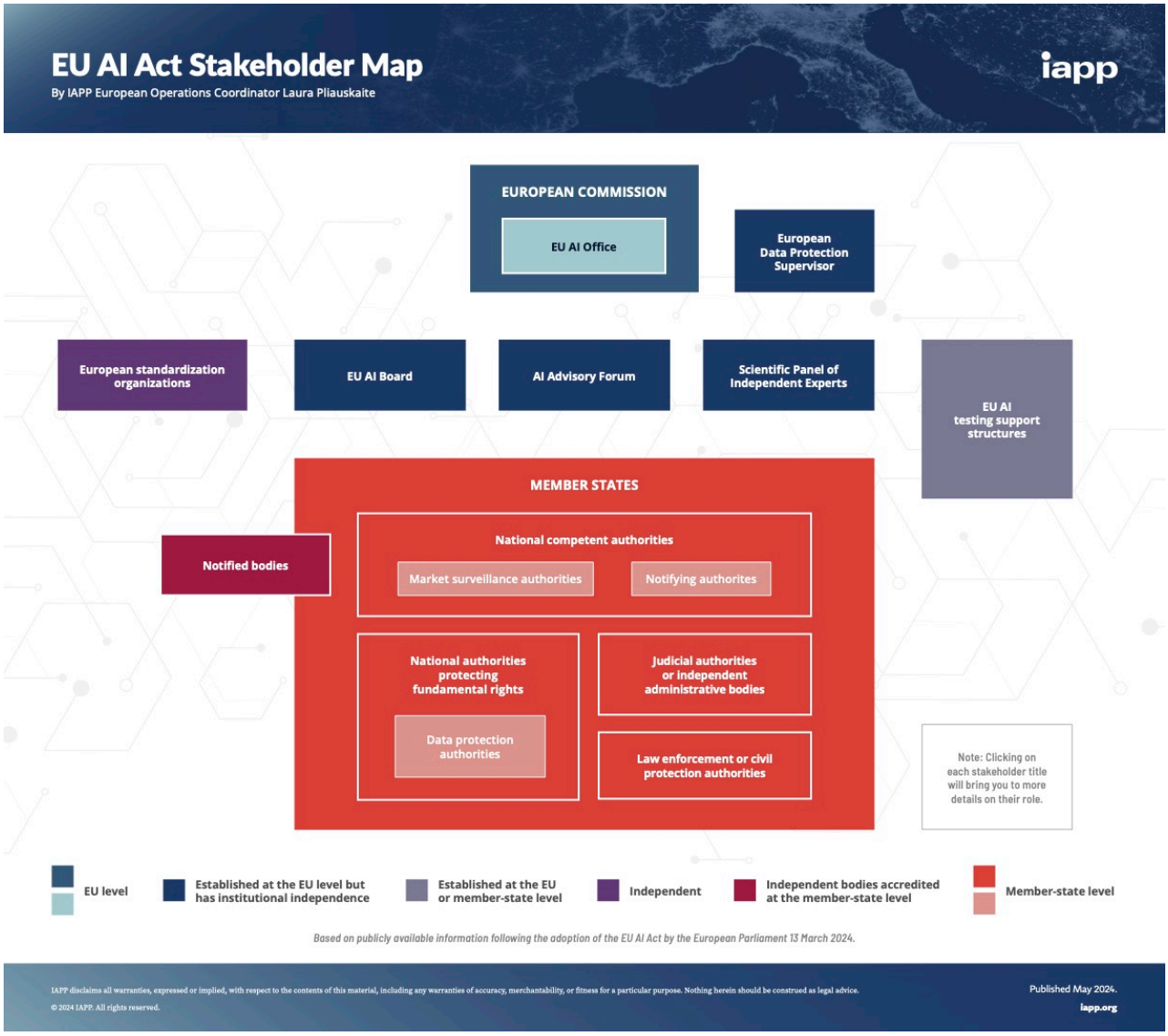
Tool no. 16: Governance framework

This tool is part of the article A Robust Governance for the AI Act: AI Office, AI Board, Scientific Panel, and National Authorities" wrote by Claudio Novelli, Philipp Hacker, Jessica Morley, Jarle Trondal, and Luciano Floridi, published in September 2024 at the European Journal of Risk Regulation. This diagram presents the various institutions responsible for implementing and monitoring the application of the EU AI Act. It identifies the relationships between each institution, including the corporate level.



Tool no. 17: Governance framework

This tool created by Laura Pliauškaitė in the toolbox EU AI Act Stakeholder Map published in May 2024 is available on IAPP's website. This tool is interactive. To explore all its potentialities click here. The chart aims to provide an overview of the instances involved in implementing and monitoring the application of the AI Act.



VI. Penalties

To encourage responsible AI deployment and ensure compliance, the AI Act establishes a tiered penalty system based on the severity of infringements. These penalties reflect the EU's commitment to safeguarding AI systems, deterring violations, and reinforcing public trust. To clarify these provisions and the associated obligations, we have selected tools and guides that offer structured explanations and visual aids, simplifying the understanding of key responsibilities and consequences.

Tool no. 18: Penalties of the EU AI Act

This guide was published by Holistic AI in February 2024. The contributors to this guide are Osman Gazi Güçlütürk, Airlie Hilliard, and Siddhant Chatterjee. The chart aims to inform stakeholders about the stringent penalties for non-compliance under the AI Act, emphasizing the importance of adhering to regulatory standards to avoid substantial fines and reputational damage.

Penalties

General fines for operators of AI systems	**Up to 35 000 000 EUR** or, if the offender is a company, up to 7 % of its total worldwide annual turnover for the preceding financial year, whichever is higher	Non-compliance with the prohibition of the artificial intelligence practices under Article 5
	Up to 15 000 000 EUR or, if the offender is a company, up to 3% of its total worldwide annual turnover for the preceding financial year, whichever is higher	Non-compliance with the following: • obligations of providers pursuant to Article 16 • obligations of authorised representatives pursuant to Article 25 • obligations of importers pursuant to Article 26 • obligations of distributors pursuant to Article 27 • obligations of deployers pursuant to Article 29, paragraphs 1 to 6a • requirements and obligations of notified bodies pursuant to Article 33, 34(1), 34(3), 34(4), 34a • transparency obligations for providers and users pursuant to Article 52
	Up to 7 500 000 EUR or, if the offender is a company, up to 1 % of its total worldwide annual turnover for the preceding financial year, whichever is higher	The supply of incorrect, incomplete or misleading information to notified bodies and national competent authorities in reply to a request
General fines for operators of AI systems	**Up to 15 000 000 EUR** or, if the offender is a company, up to 3% of its total worldwide annual turnover for the preceding financial year, whichever is higher	In one of the following: • Infringement of the GPAI-relevant provisions • Failure to comply with a request for document or information pursuant to Article 68i or supply of incorrect, incomplete or misleading information • Failure to comply with a measure requested under Article 68k • Failure to make available to the Commission access to the general purpose AI model or general purpose AI model with systemic risk with a view to conduct an evaluation pursuant to Article 68j
For Union institutions, agencies and bodies	**Up to EUR 1 500 000**	Non-compliance with the prohibition of the artificial intelligence practices under Article 5
	Up to EUR 750 000	Non-compliance of the AI system with any requirements or obligations

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Tool no. 19: Penalties of the EU AI Act

The AI Regulation penalty guide, prepared by AI-regulation.com, offers a clear and structured overview of the penalties for non-compliance under the AI Act. The table categorizes penalties into three levels of infringements, outlining the corresponding articles and fines.

	Category	Article Reference	Examples	Penalties
1	Very Serious Infringements	Article 71(3)	Non-compliance with prohibited practices (Article 5); Failing to meet high-risk AI requirements (Articles 8-15); Circumventing conformity assessment procedures (Article 43)	Up to €30 million or 6% of global turnover
2	Serious Infringements	Article 71(4)	Failure to provide clear information on the AI system purpose (Article 52); Non-compliance with obligations for limited-risk systems (Article 52(3)); Inadequate reporting of high-risk system malfunctions (Article 62)	Up to €20 million or 4% of global turnover
3	Other Infringements	Article 71(5)	Failing to register high-risk AI in EU database (Article 60); Not cooperating with supervisory authorities (Article 64); Omitting updates to technical documentation (Article 16)	Up to €10 million or 2% of global turnover

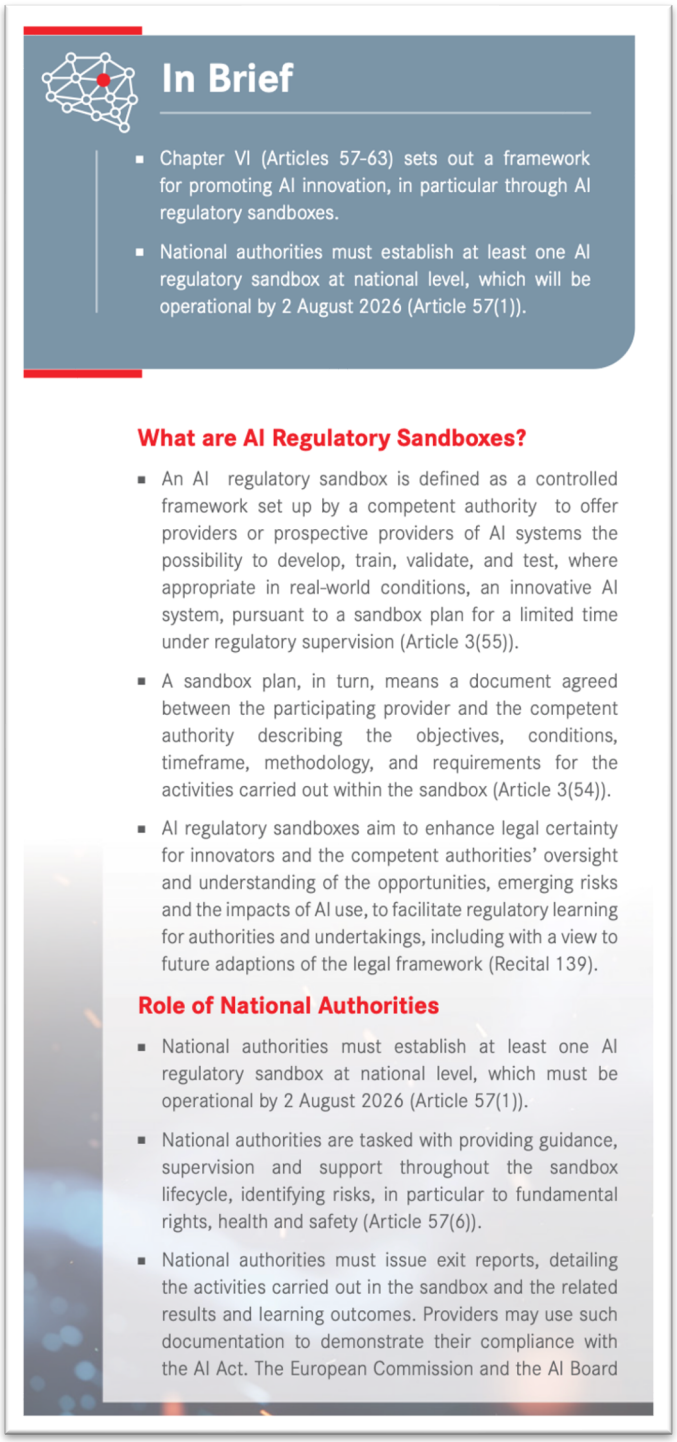
AI-Regulation.com

VII. Measures to support innovation

The AI Act introduces a range of measures to foster innovation, with particular emphasis on AI regulatory sandboxes. These supervised environments allow organizations to develop, test, and validate AI systems under the guidance of competent authorities, ensuring compliance while encouraging experimentation.

Tool no. 20: The EU Artificial Intelligence Act: A Guide for Businesses

The Matheson AI Act Guide was published in October 2024 on Matheson website. It outlines key measures to support innovation under the EU AI Act, and the extract presented here focuses on AI regulatory sandboxes.



In Brief

- Chapter VI (Articles 57-63) sets out a framework for promoting AI innovation, in particular through AI regulatory sandboxes.
- National authorities must establish at least one AI regulatory sandbox at national level, which will be operational by 2 August 2026 (Article 57(1)).

What are AI Regulatory Sandboxes?

- An AI regulatory sandbox is defined as a controlled framework set up by a competent authority to offer providers or prospective providers of AI systems the possibility to develop, train, validate, and test, where appropriate in real-world conditions, an innovative AI system, pursuant to a sandbox plan for a limited time under regulatory supervision (Article 3(55)).
- A sandbox plan, in turn, means a document agreed between the participating provider and the competent authority describing the objectives, conditions, timeframe, methodology, and requirements for the activities carried out within the sandbox (Article 3(54)).
- AI regulatory sandboxes aim to enhance legal certainty for innovators and the competent authorities' oversight and understanding of the opportunities, emerging risks and the impacts of AI use, to facilitate regulatory learning for authorities and undertakings, including with a view to future adaptions of the legal framework (Recital 139).

Role of National Authorities

- National authorities must establish at least one AI regulatory sandbox at national level, which must be operational by 2 August 2026 (Article 57(1)).
- National authorities are tasked with providing guidance, supervision and support throughout the sandbox lifecycle, identifying risks, in particular to fundamental rights, health and safety (Article 57(6)).
- National authorities must issue exit reports, detailing the activities carried out in the sandbox and the related results and learning outcomes. Providers may use such documentation to demonstrate their compliance with the AI Act. The European Commission and the AI Board

Tool no. 21: Guide to the AI Act - a detailed breakdown of what you need to know

The Guide to the AI Act by A&L Goodbody was published in October 2024. It includes a section on measures to support innovation under the AI Act (Articles 57–63): AI regulatory sandboxes, real-world testing, and support for SMEs.

A AI Literacy

Article 4 of the Act includes a general requirement for the Providers and Deployers of any type of AI systems to take measures to ensure, to their best extent, a sufficient level of AI literacy of their staff and other persons dealing with the operation and use of AI systems on their behalf, taking into account their technical knowledge, experience, education and training and the context the AI systems are to be used in, and considering the persons or groups of persons on whom the AI systems are to be used.

B Measures in support for innovation (Article 57 - 63)

i. **Sandboxes:** Each Member State must establish at least one "AI regulatory sandbox" at a national level, which must be operational within 2 years from the date the Act enters into force.

An 'AI regulatory sandbox' is defined as a controlled framework set up by a competent authority which offers providers or prospective providers of AI systems the possibility to develop, train, validate and test, a new AI system, pursuant to a "sandbox plan" for a limited time under regulatory supervision.

Articles 53-59 sets out rules in respect of the functioning of such sandboxes, including rules around how access will be provided, the length of access, the liability for any damage occurring as a result of experimentation within the sandbox and the management of personal data within such sandboxes.

ii. **Real World Testing:** Article 60 and 61 sets out approved conditions to allow for the testing of HRAI systems within real world conditions. The conditions include specifications in respect of the testing plan which must be created and submitted to the relevant MSA, the transfer of data relating to the test, the length of the testing period, level of oversight required and the type of consent providers are required to obtain from subjects of the testing prior to their participation.

iii. **Smaller enterprises:** Article 62 places a number of obligations on Member States to assist in encouraging SMEs to apply the Act to their operations, including through the provision of training and advice on application. Article 63 allows for microenterprises to comply with certain elements of the quality management system required under Article 17 in a simplified manner, to take account of the relative resources available.

Tool no. 22: AI Regulatory Sandboxes

The European Union Artificial Intelligence Act: a guide created by Bird & Bird highlights key measures in support of innovation under the AI Act, particularly focusing on AI regulatory sandboxes and SME incentives.

AI regulatory sandboxes

The AI Act enables the creation of *"regulatory sandboxes"* to provide a controlled environment in which to test innovative AI systems for a limited period before they are placed on the market or otherwise put into service. The objectives of the AI regulatory sandbox regime include:

- fostering AI innovation while ensuring innovative AI systems comply with the AI Act;
- enhancing legal certainty for innovators;
- enhancing national competent authority understanding of the opportunities, risks and the impacts of AI use;
- supporting cooperation and the sharing of best practices; and
- accelerating access to markets, including by removing barriers for SMEs and start-ups.

What is a regulatory sandbox under the AI Act?

The AI Act defines an *"AI regulatory sandbox"* as:

"a controlled framework set up by a competent authority which offers providers or prospective providers of AI systems the possibility to develop, train, validate and test, where appropriate in real-world conditions, an innovative AI system, pursuant to a sandbox plan for a limited time under regulatory supervision."

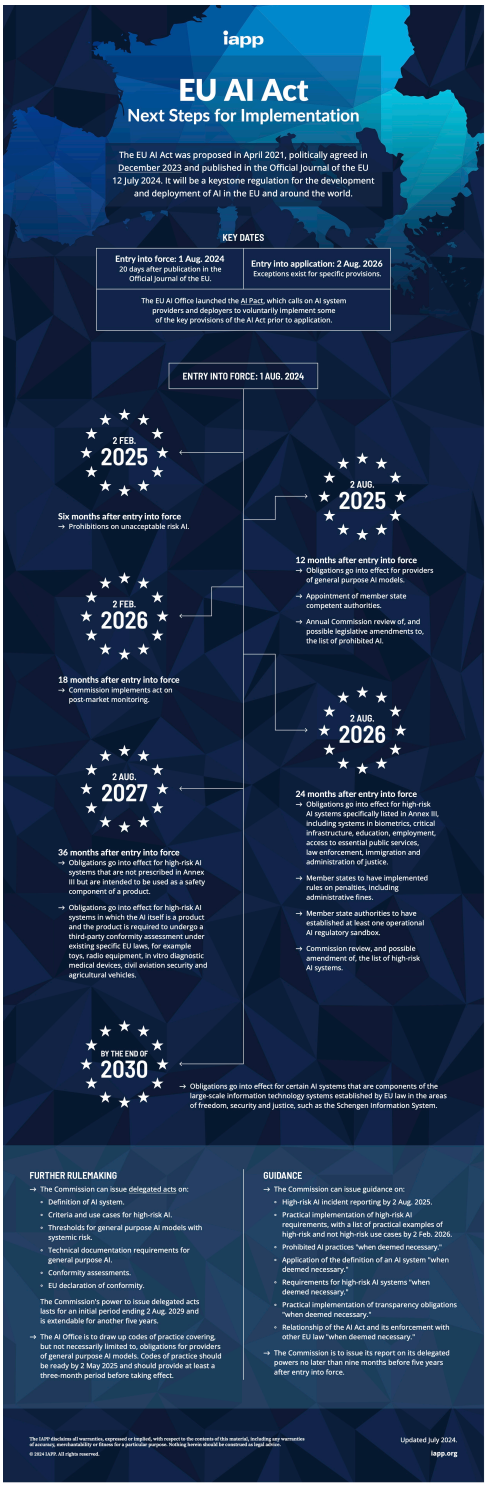
AI regulatory sandboxes can be established in physical, digital or hybrid form and may accommodate physical as well as digital products.

VIII. Timeline and Next Steps

The AI Act establishes a phased timeline and clear milestones for compliance. Beginning with its entry into force on August 1, 2024, the Act rolls out additional deadlines over the next three years—including prohibitions on unacceptable-risk AI and obligations for high-risk systems. To help stakeholders stay on track, we have identified tools and guides that offer concise timelines, actionable steps, and visual aids, simplifying the journey toward full compliance with the AI Act.

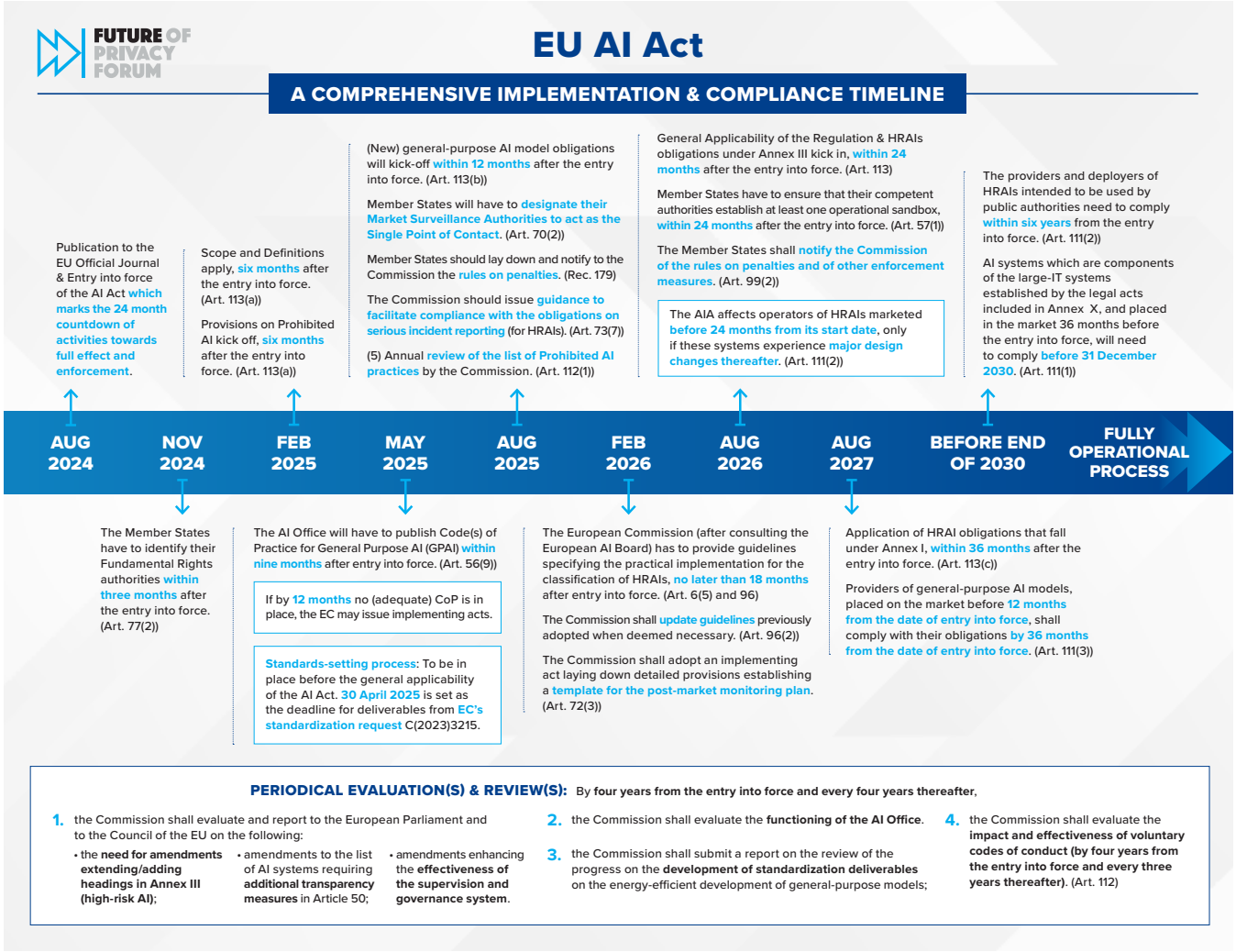
Tool no. 23: EU AI Act: Next Steps for Implementation

This chart prepared by the IAPP outlines key milestones and timelines under the AI Act.



Tool no. 24: EU AI Act Timeline

The Future of Privacy Forum prepared in December 2024 a comprehensive implementation and compliance timeline of the AI Act. The timeline offers a complete overview of the different application dates associated with the provisions entering into force. Additionnaly, the tool provides a summary of the key definitions and succinctly presents the periodical evaluation and review of the Act.



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This work has been partially supported by MIAI @ Grenoble Alpes, (ANR-19-P3IA-0003) and by the Interdisciplinary Project on Privacy (IPoP) of the Cybersecurity PEPR (ANR 22-PECY-0002 IPOP).