



Council of the European Union
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LIMITE

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MEETING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Telecommunications and Information Society
Subject:	AI Act Implementation update - Presentation

Delegations will find in the annex the presentation "AI Act Implementation update".

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AI Act implementation update

AI Office, 23 September 2025

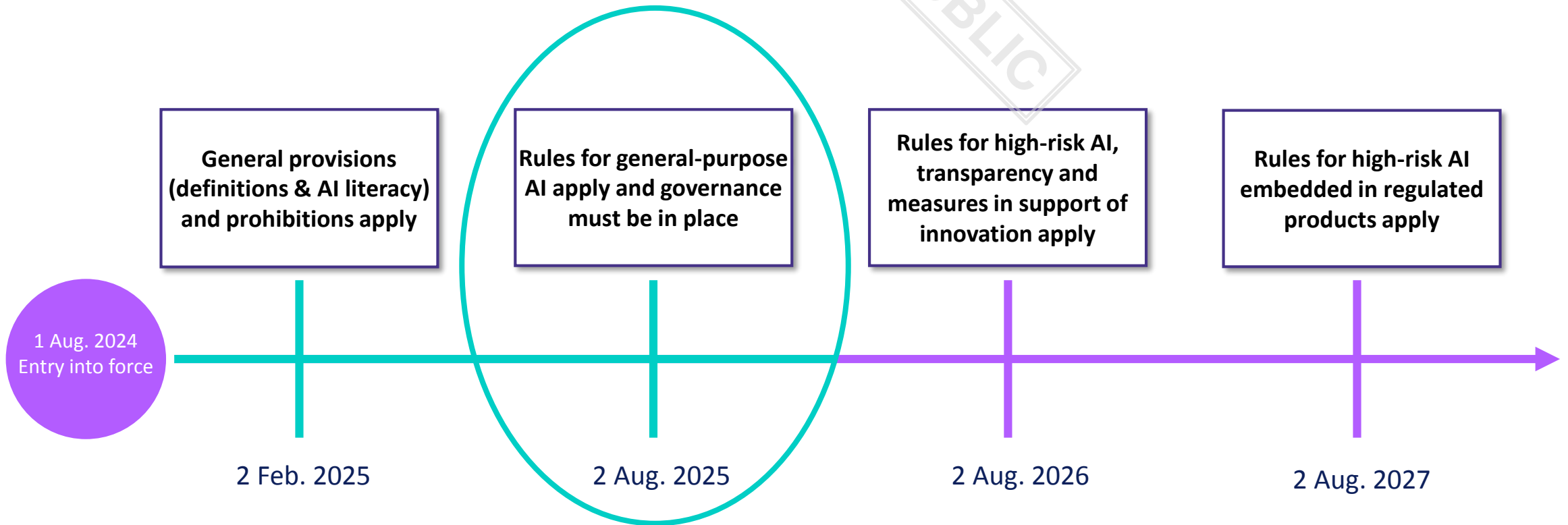


EUROPEAN ARTIFICIAL
INTELLIGENCE OFFICE



UPDATE ON RECENT IMPLEMENTATION MILESTONE

RECENT IMPLEMENTATION MILESTONE ON 2 AUGUST 2025



GENERAL-PURPOSE AI MODEL RULES

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What does it mean in practice?

- Transparency rules apply to providers of general-purpose AI models
- Providers of the most powerful models have additional risk management obligations
- Supervision and enforcement of the Commission, entrusted to AI Office

Our guidance package:

**General-purpose AI Code of practice
as tool to demonstrate compliance**

**Guidelines to clearly delineate the
scope of the rules**

**Template for training data summary
to support copyright enforcement**

NATIONAL GOVERNANCE

- National implementation deadline passed on 2 August 2025
- Very few Member States have been able to complete full implementation
- Important priority for COM, AI Office ready to support
- COM will pay particular attention that national laws do not undermine harmonisation effect of the AI Act

National obligations in detail:

- Article 70(2): Designate and notify national competent authorities
- Article 70(6): Report on financial and human resources of authorities
- Article 99(2): Notify national law laying down rules on penalties

Recent support measures:

- Implementation roundtables in AI Board
- Interpretative note on Article 99
- Practical guidance for notification according to Article 70(2), (6) and 99(2)
- Template for report according to Art 70(6)
- Bilateral support & guidance

WORK OF THE AI BOARD



AI Board

- Representatives from Member States, EEA EFTA members & EDPS
- Chaired by Member States, following Council Presidency
- Advising and steering on matters of AI policy

AI Board subgroups:

PHASE 1 (second half of 2024)

- Innovation ecosystem
- AI regulatory sandboxes
- Interplay with MDR and IVDR
- Prohibitions
- Standards
- Steering Group on GPAI

➤ Established and regular meetings.

PHASE 2 (first half of 2025)

- AI Act interplay with other EU law
- Annex III High-risk
- Law enforcement and security
- Financial services

Established outside planning:

- Review of rules of procedure
- Network of communicators

➤ Established and regular meetings.

PHASE 3 (second half of 2025)

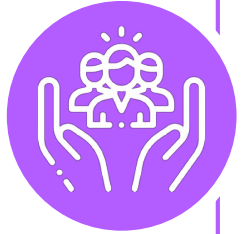
- Market surveillance authorities (AdCo)
- Notifying authorities

Established outside planning:

- Transparency

➤ Establishment in progress.

SET UP OF ADVISORY BODIES – SCIENTIFIC PANEL AND ADVISORY FORUM



Scientific Panel

- Composed of independent experts with scientific or technical expertise
- Supports in enforcement of AI Act, can issue alerts of risks
- Implementing regulation details its establishment and operation



Progress:

- Call closed on 14 September, ~1300 applications, selection ongoing



Advisory Forum

- Advises AI Office & AI Board by providing stakeholder input and technical advice
- Diverse composition, balancing commercial and non-commercial interests



Progress:

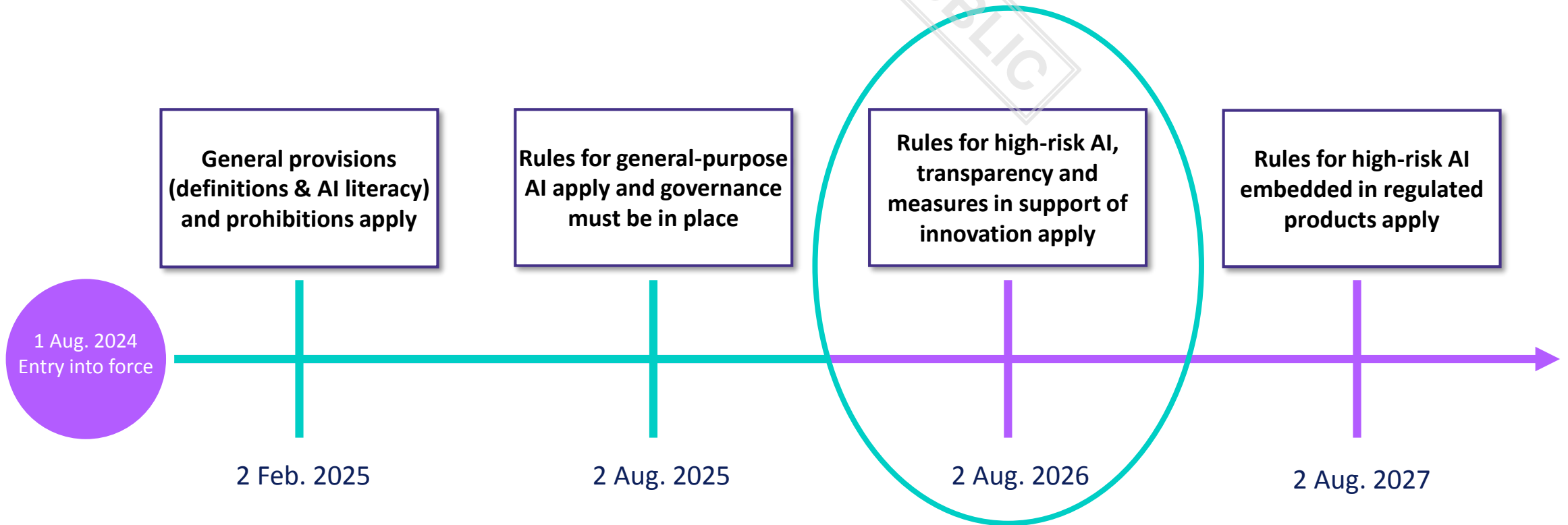
- Call closed on 14 September, 716 applications, selection ongoing





IMPLEMENTATION PRIORITIES FOR FALL 2025

NEXT IMPLEMENTATION MILESTONE IS 2 AUGUST 2026



DELIVERABLES RELATED TO HIGH-RISK AI SYSTEMS

TO BE ADOPTED IN FALL 2025:

- Report on review of Annex III and prohibitions
- Guidance on reporting of serious incidents

ONGOING PREPARATION:

- Contributing & closely monitoring development of standards
- Guidelines on high-risk classification (Q1 2026)
- Implementing act with template for post-market monitoring plan (Q1 2026)
- Guidelines on high-risk obligations, substantial modification and AI value chain (Q2 and Q3 2026)
- Template for fundamental rights impact assessment (Q2 2026)
- Set-up of EU database for high-risk AI systems (Q2 2026)

DELIVERABLES RELATED TO TRANSPARENCY

ONGOING PREPARATION:

- Code of Practice on synthetic AI content (Q2 2026)
- Guidelines on transparent AI systems (Q2 2026)

▶ Ongoing public consultation on transparent AI systems (open until 2 October).

▶ Ongoing Call for expression of interest for stakeholders to participate in Code of Practice (open until 2 October).

GENERAL-PURPOSE AI MODELS

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ONGOING PREPARATION:

- Implementing act on procedures for the evaluation of GPAI models (Q2 2026)
- Implementing act on procedures for the imposition of penalties on GPAI providers, including procedural safeguards (Q2 2026)

UNDER CONSIDERATION:

- Revision of threshold for GPAI models to classify as having systemic risk

MEASURES IN SUPPORT OF INNOVATION

ONGOING PREPARATION:

- Implementing act with harmonised rules for the establishment, development, implementation, operation & supervision of AI regulatory sandboxes (Q1 2026)
- Implementing act setting out a template for the real-world testing plan (Q2 2026)

OTHER DELIVERABLES UNDER PREPARATION

ONGOING PREPARATION:

- Joint guidelines with European Data Protection Board on interplay of AI Act and GDPR interplay
- Guidance on Article 31 – notification of notified bodies
- Preparation of new standardisation requests (energy consumption & biometrics)



OTHER AI ACT PRIORITIES

UPCOMING DIGITAL OMNIBUS

Data acquis

Cybersecurity incident reporting

AI Act

Digital Identify

FOR AI ACT:

- Targeted amendments to tackle implementation challenges, while preserving predictability

Open [Call for Evidence](#) to gather stakeholder input (open until 14 October).



STAKEHOLDER OUTREACH & SUPPORT IN COMPLIANCE

ECOSYSTEM OF SUPPORT

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Central EU support



In-depth
guidance,
standards,
code of practice



Engaging with
AI Office
through
AI Pact



Free advice
from AI Act
Service Desk



Local support



European
Digital
Innovation
Hubs as local
contacts



Engaging with
authorities in
AI regulatory
sandboxes



6th [AI Pact webinar](#) taking place today – on GPAI and Code of Practice.

AI ACT SERVICE DESK

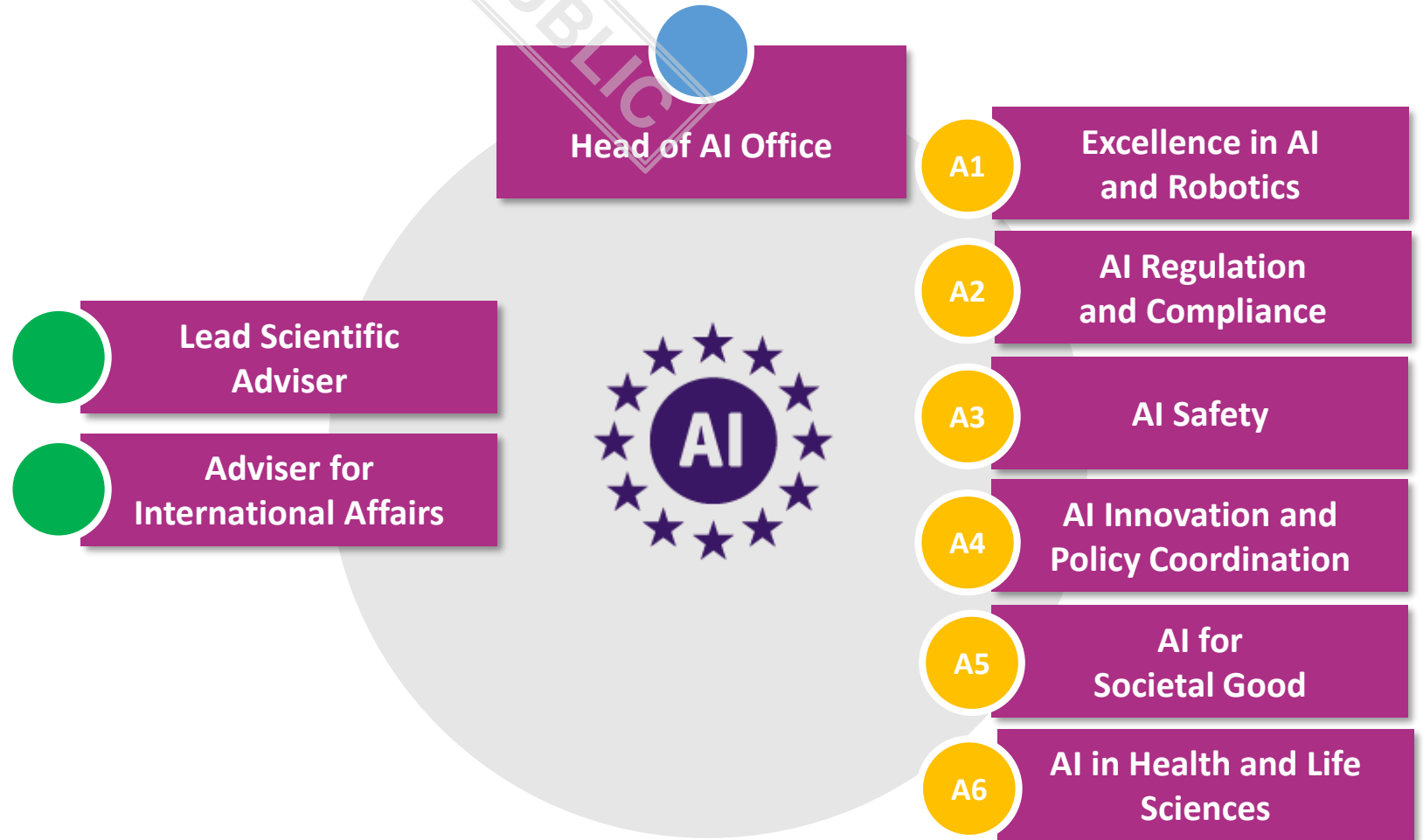
- Possibility for stakeholders to submit queries about the AI Act to the AI Office and receive tailored feedback
- **Multilingual** support
- Complementary to other schemes
 - Regulatory sandboxes, EDIHs, national helpdesks
- Integrated into **Single Information Platform**
 - **AI Act Explorer**
 - **Compliance Checker**
 - **FAQ**
 - **Repository of EC and national resources**
- Target launch date: early October



PROGRESS ON ESTABLISHMENT OF AI OFFICE

PROGRESS OF ESTABLISHMENT OF AI OFFICE

- AI Office is currently at approx. 140 staff members
- Recruitment continues, mainly for Units A2 and A3
- Ongoing selection for Lead Scientific Adviser & Head of Unit AI Safety



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THANK YOU



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