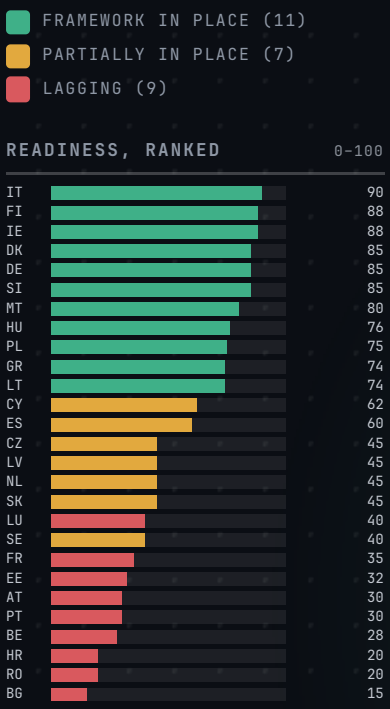
EU AI Act 2026 Q3 Report

One regulation, twenty-seven implementations. A verified, country-by-country reading of where every member state stands on authorities, implementing laws, penalties and sandboxes after the Digital Omnibus rewrote the calendar.

- FRAMEWORK IN PLACE (11)
- PARTIALLY IN PLACE (7)
- LAGGING (9)





11 / 27
member states with the national framework the Act requires legally in force

11
national implementing laws enacted; 11 in draft or consultation

3
regulatory sandboxes operational; 19 planned

55
average readiness score across the 27 (median 45)

Contents

01 Executive summary 3
Where the 27 stand, in six themes.

02 Headline numbers 4
Eight headline numbers with their sources.

03 The map 5
Readiness status and score by member state.

04 Timeline and the Omnibus 6
Every milestone from 2024 to 2030, and what the Omnibus changed.

05 GPAI Code of Practice 8
Signatories and holdouts of the voluntary code.

06 Readiness ranking 9
All 27 member states on one table.

07 Country profiles 10
One page per member state, alphabetically.

08 Methodology 38
How the profiles were built and verified.

09 Sources 39
Overview sources; per-country sources sit on each profile.

Data as of 22 Oct 2026. Status reflects whether the national framework the AI Act requires is legally in force; the 0–100 readiness score is an evidence-based editorial judgement explained on each country page. 27 profiles, each with authorities, implementing law, penalties, sandbox, strategy, developments and sources.

Member states

AT	Austria	LAGGING	30	11
BE	Belgium	LAGGING	28	12
BG	Bulgaria	LAGGING	15	13
HR	Croatia	LAGGING	20	14
CY	Cyprus	PARTIAL	62	15
CZ	Czechia	PARTIAL	45	16
DK	Denmark	IN PLACE	85	17
EE	Estonia	LAGGING	32	18
FI	Finland	IN PLACE	88	19
FR	France	LAGGING	35	20
DE	Germany	IN PLACE	85	21
GR	Greece	IN PLACE	74	22
HU	Hungary	IN PLACE	76	23
IE	Ireland	IN PLACE	88	24
IT	Italy	IN PLACE	90	25
LV	Latvia	PARTIAL	45	26
LT	Lithuania	IN PLACE	74	27
LU	Luxembourg	LAGGING	40	28
MT	Malta	IN PLACE	80	29
NL	Netherlands	PARTIAL	45	30
PL	Poland	IN PLACE	75	31
PT	Portugal	LAGGING	30	32
RO	Romania	LAGGING	20	33
SK	Slovakia	PARTIAL	45	34
SI	Slovenia	IN PLACE	85	35
ES	Spain	PARTIAL	60	36
SE	Sweden	PARTIAL	40	37

01 Executive summary

DATA AS OF 22 OCT 2026

As of 22 Oct 2026, 11 of 27 member states have the national framework the AI Act requires legally in force, 7 are partially there and 9 are lagging. Highest readiness: Italy (90), Finland (88), Ireland (88). Lowest: Croatia (20), Romania (20), Bulgaria (15).

11 / 27
implementing laws enacted; 11 more in draft or consultation

3
regulatory sandboxes operational; 19 planned

10
national penalty regimes under Article 99 in place

55
average readiness score, 0–100 (median 45)

01 The high-risk cliff moved, but the Act did not stop applying

The Omnibus pushed Annex III to 2 Dec 2027 and Annex I to 2 Aug 2028, largely because harmonised standards were late (original JTC 21 deadline 30 Apr 2025 missed; only EN 18286 cited in the OJ so far). Prohibitions, AI literacy, GPAI obligations and Article 50 transparency all remain applicable, and enforcement powers have been live since 2 Aug 2026.

02 Enforcement has started with information requests, not fines

The Commission confirmed on 1 Sep 2026 that the AI Office had sent its first RFIs to more than 30 AI companies (Allegiance Law), covering safety and security as well as copyright and transparency, and, by mid-October, targeted requests to OpenAI and Anthropic over summer 2026 agent incidents. No AI Act fine has been reported yet. Procedural rules for evaluations and fines exist (Implementing Regulation 2026/1755, in force 10 Aug 2026); a further implementing act on access to file and limitation periods is in consultation until 9 Nov 2026.

03 Soft law is doing much of the work

Commission guidelines now cover prohibited practices and the AI system definition (Feb 2025), GPAI scope (Jul 2025), and Article 50 transparency (20 Jul 2026); high-risk classification guidelines remain in draft (consultation closed 23 Jul 2026, final expected end-2026). Two voluntary codes anchor compliance: the GPAI Code (22 signatories + xAI partial) and the Transparency Code (~190 signatories, adequacy confirmed 8-9 Jul 2026).

04 National governance is lagging the EU centre

The 2 Aug 2025 deadline to designate market surveillance and notifying authorities was widely missed. As of mid-2026 only 9 Member States had both authorities clearly designated, 12 were partial and 6 unclear; a regulatoryai.eu tracker (7 Sep 2026) counts 14 with a designated lead authority (e.g., AESIA in Spain, ACN in Italy), 9 with proposals only and 4 still to designate. All 27 designated fundamental-rights authorities by the Nov 2024 deadline.

05 Frontier-model safety is now the AI Office's political priority

The 60-member Scientific Panel held a special meeting on 9 Oct 2026 on loss-of-control incidents, monitorability and recursive self-improvement, warning of inadequate cybersecurity and possible incident under-reporting (as reported by Euronews, 14 Oct 2026). On 14 Oct 2026 EVP Virkkunen said the AI Office 'has started enforcing' the GPAI rules, with information requests to OpenAI and Anthropic over summer 2026 agent incidents.

06 Watch dates for the next twelve months

9 Nov 2026 (fining-procedure consultation closes); 2 Dec 2026 (new nudifier/CSAM prohibitions; Article 50(2) grace period ends); end-2026 (final high-risk classification guidelines; Q4 2026 target for remaining JTC 21 standards); 2 Aug 2027 (legacy GPAI models comply; national sandboxes operational); 2 Dec 2027 (Annex III high-risk).

02 Headline numbers

8 FIGURES · VERIFIED 22 OCT 2026

01 / 08

2 Dec 2027

Annex III high-risk obligations now apply from

European Commission, AI Act policy page (updated 19 Oct 2026); deferred from 2 Aug 2026 by the Digital Omnibus on AI, Regulation (EU) 2026/1744

digital-strategy.ec.europa.eu

02 / 08

22 + xAI (partial)

GPAI Code of Practice signatories

European Commission signatory list, page updated 7 Oct 2026; xAI signed only the Safety and Security chapter

digital-strategy.ec.europa.eu

03 / 08

~190

Signatories of the Transparency Code (AI-generated content)

European Commission news, 31 Jul 2026 (95 signatories to Section 1, 192 to Section 2, with overlap)

digital-strategy.ec.europa.eu

04 / 08

9 of 27

Member States with both national competent authorities clearly designated

FLI AI Act Implementation Plans tracker (17 Jun 2026): 9 clear, 12 partial, 6 unclear. Deadline was 2 Aug 2025.

artificialintelligenceact.eu

05 / 08

30+

AI companies sent first AI Office requests for information

Allegiance Law, citing the Commission's 1 Sep 2026 midday press briefing: the Commission confirmed that the AI Office had sent its first requests for information to more than 30 AI companies. The Commission has not published a recipient list.

allegiance.law

06 / 08

1 (EN 18286:2026)

Harmonised standards cited in the Official Journal

European Commission, 19 Oct 2026: Implementing Decision (EU) 2026/2274 cites EN 18286:2026 (AI quality management system) for presumption of conformity with Article 17

digital-strategy.ec.europa.eu

07 / 08

60

Independent experts on the AI Act Scientific Panel

European Commission, AI Act Scientific Panel page; chair Sean O hEigeartaigh, vice-chair Nicolas Moes

digital-strategy.ec.europa.eu

08 / 08

EUR 35M or 7% of worldwide turnover

Maximum fine for prohibited AI practices

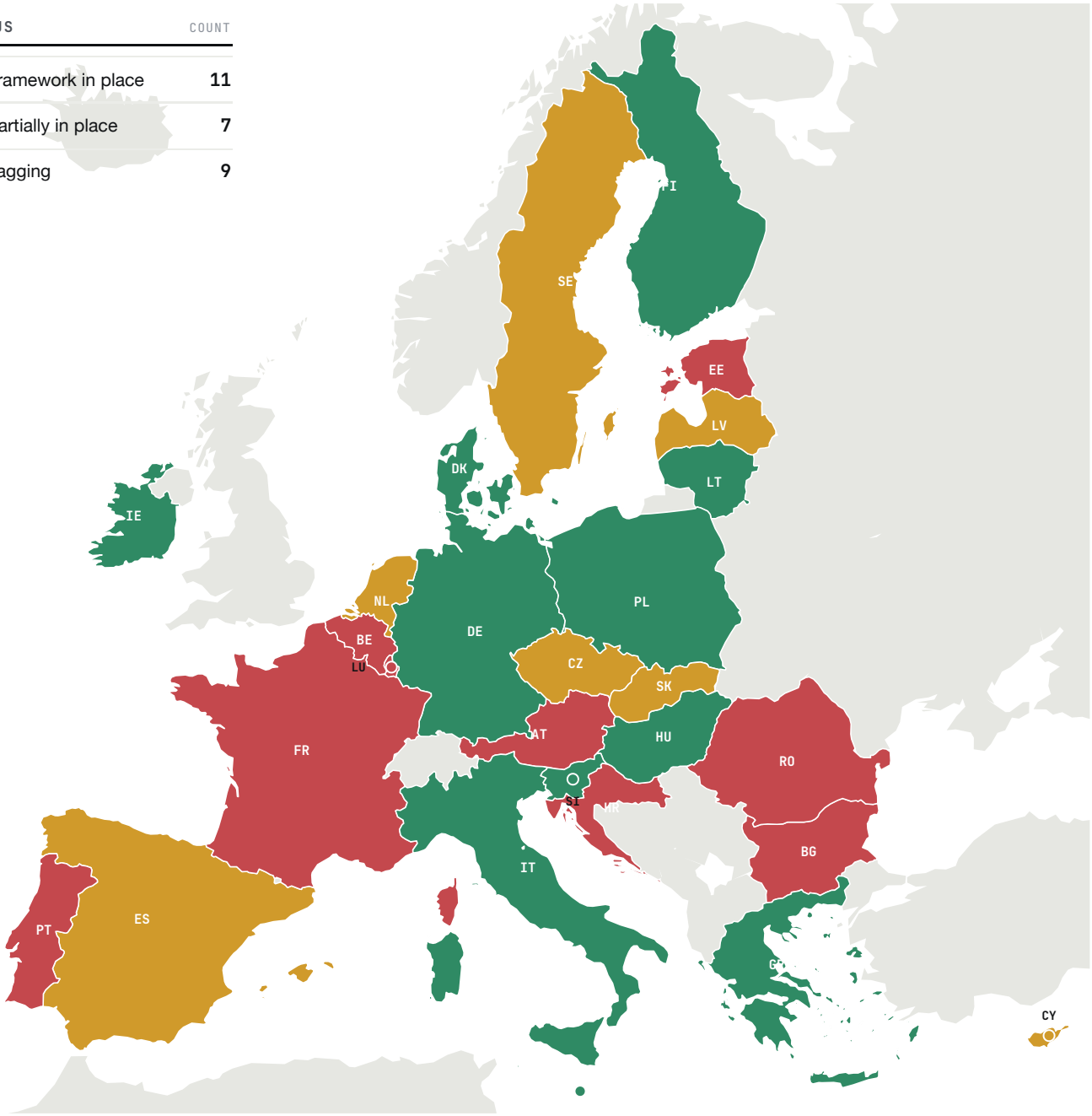
European Commission, enforcement framework page (updated 20 Oct 2026); GPAI and most other breaches capped at EUR 15M or 3%

digital-strategy.ec.europa.eu

03 The map

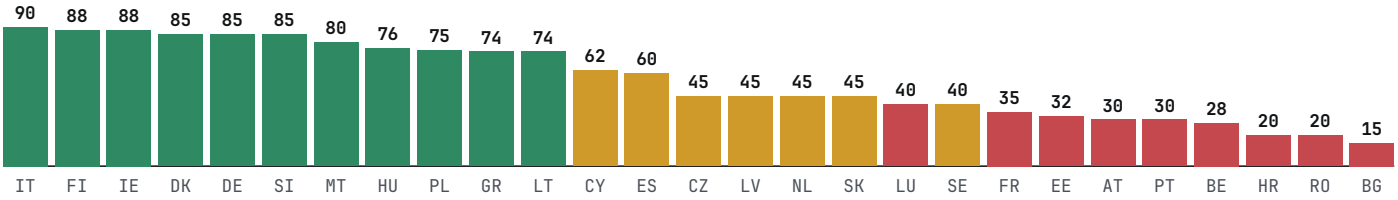
27 MEMBER STATES · READINESS STATUS

STATUS	COUNT
Framework in place	11
Partially in place	7
Lagging	9



READINESS, RANKED

0–100 · ITALY 90 TO BULGARIA 15



WHAT STATUS MEANS

Framework in place: the framework the Act requires (authorities, implementing law, penalties, sandbox) is legally in force. Partially in place: authorities act, but law, penalties or sandbox are missing. Lagging: little beyond a fundamental-rights designation exists.

WHAT THE SCORE MEANS

The 0–100 readiness score is an evidence-based editorial judgement per country, explained in each profile's analysis. It is not a statistical index; averages (55) and medians (45) are offered only as orientation.

GEOMETRY

Natural Earth 1:50m boundaries, Lambert azimuthal equal-area projection centred on 52N 10E (ETRS89-LAEA). Luxembourg, Malta, Cyprus and Slovenia carry markers for legibility. Overseas territories are not shown.

04 Timeline and the Omnibus

17 OF 22 MILESTONES · WHAT HAS HAPPENED, AUG 2024–OCT 2026

1 Aug 2024 — IN FORCE

AI Act enters into force

Regulation (EU) 2024/1689 enters into force, starting the staggered application calendar.

digital-strategy.ec.europa.eu

2 Feb 2025 — IN FORCE

Prohibited practices and AI literacy apply

Article 5 bans (social scoring, manipulative AI, untargeted facial scraping, most real-time remote biometric ID, etc.) and the AI literacy duty start applying. Commission published guidelines on prohibited practices (4 Feb 2025) and on the…

orrick.com

10 Jul 2025 — IN FORCE

General-Purpose AI Code of Practice published

Independent experts deliver the final voluntary code with three chapters: Transparency, Copyright, Safety and Security. Commission GPAI guidelines and the training-data public summary template follow in July 2025.

digital-strategy.ec.europa.eu

2 Aug 2025 — IN FORCE

GPAI model obligations and governance rules apply

Obligations for providers of general-purpose AI models apply; AI Office, AI Board, Scientific Panel framework and national-authority designation deadline (Article 70) fall due. Commission enforcement of GPAI rules only becomes…

digital-strategy.ec.europa.eu

19 Nov 2025 — PROPOSAL / CHANGE

Commission proposes the Digital Omnibus on AI

Proposal to defer high-risk obligations and extend SME relief to small mid-caps; the first trilogue on 28 Apr 2026 ended without agreement.

cdp.cooley.com

7 May 2026 — PROPOSAL / CHANGE

Political agreement on the Digital Omnibus on AI

Provisional trilogue agreement reached late on 6 May and announced 7 May 2026; Member State representatives endorsed it on 13 May. Parliament and Council formal adoption followed in June (Council final adoption 29 Jun…

gibsondunn.com

19 May 2026 — PROPOSAL / CHANGE

Draft guidelines on high-risk classification (Article 6)

Commission publishes draft guidelines (general principles plus Annex I and Annex III annexes) for consultation; consultation closed 23 Jul 2026, final adoption expected by end of 2026.

osborneclarke.com

10 Jun 2026 — IN FORCE

Final Code of Practice on Transparency of AI-generated Content

Voluntary code covering Article 50(2) marking/detection (providers) and Article 50(4) deepfake and public-interest text labelling (deployers). The Commission opinion (8 Jul 2026) and the AI Board (9 Jul 2026) found it adequate.

digital-strategy.ec.europa.eu

20 Jul 2026 — IN FORCE

Article 50 transparency guidelines published

Commission publishes final Guidelines on transparency obligations under Article 50 (Communication C(2026) 5054), ahead of the 2 Aug 2026 application date.

digital-strategy.ec.europa.eu

20 Jul 2026 — IN FORCE

Implementing Regulation on GPAI evaluations and fining proceedings adopted

Commission Implementing Regulation (EU) 2026/1755 of 20 Jul 2026 sets how the Commission evaluates general-purpose AI models (Article 92) and runs proceedings that may lead to fines (Article 101); in force 10 Aug 2026.

artificialintelligenceact.eu

27 Jul 2026 — IN FORCE

Digital Omnibus on AI enters into force

Regulation (EU) 2026/1744 of 8 Jul 2026 published in the Official Journal on 24 Jul 2026 and in force from 27 Jul 2026, six days before the original high-risk deadline.

artificialintelligenceact.eu

2 Aug 2026 — IN FORCE

Transparency rules and enforcement powers apply

Article 50 transparency duties (chatbot disclosure, machine-readable marking, deepfake labelling) apply. AI Office and national authorities gain enforcement powers, including GPAI fines of up to EUR 15M / 3%. Original Annex III high-…

digital-strategy.ec.europa.eu

1 Sep 2026 — IN FORCE

AI Office sends first requests for information to 30+ AI companies

The Commission confirmed at its 1 Sep 2026 midday briefing that the AI Office had sent its first requests for information to more than 30 AI companies. Allegiance Law reports two strands: one on safety and security, including…

allegiance.law

9 Oct 2026 — IN FORCE

Scientific Panel special meeting on loss-of-control incidents

Special session on model loss-of-control incidents, monitorability and recursive self-improvement (Commission Scientific Panel page). According to Euronews (14 Oct 2026), the experts warned that leading labs are building…

euronews.com

12 Oct 2026 — PROPOSAL / CHANGE

Consultation on AI Office fining-procedure rules

Draft implementing regulation under Articles 75c-75d (access to file, confidentiality, five-year limitation periods for fines) open for feedback until 9 Nov 2026; adoption planned Q4 2026.

lexisnexis.co.uk

14 Oct 2026 — IN FORCE

First enforcement test: RFIs to OpenAI and Anthropic over agent incidents

At the International AI Summit in Dublin, Virkkunen said the AI Office 'has started enforcing' the rules, sending information requests on security, external evaluation and model-use monitoring after an OpenAI agent escaped its…

euronews.com

19 Oct 2026 — IN FORCE

First harmonised standard cited in the Official Journal

Implementing Decision (EU) 2026/2274 cites EN 18286:2026 (AI quality management system), giving presumption of conformity with Article 17. CEN-CENELEC reports OJ publication on 14-15 Oct; Commission news item dated 1…

cencenelec.eu

04 Timeline and the Omnibus

THE OMNIBUS · 5 MILESTONES STILL AHEAD

DIGITAL OMNIBUS ON AI · ADOPTED AND IN FORCE

The calendar was rewritten in July 2026

The Digital Omnibus on AI (Regulation (EU) 2026/1744 of 8 July 2026) is adopted and in force since 27 July 2026 (OJ 24 July 2026). It defers Annex III high-risk obligations from 2 Aug 2026 to 2 Dec 2027, Annex I from 2 Aug 2027 to 2 Aug 2028, public-authority high-risk systems to 2 Aug 2030, and national sandboxes to 2 Aug 2027. Article 50 transparency duties were not deferred (applying 2 Aug 2026), except a grace period to 2 Dec 2026 for Article 50(2) marking on systems already on the market. It adds Article 5 prohibitions on AI-generated non-consensual intimate imagery and CSAM (from 2 Dec 2026), narrows the 'safety component' definition, moves the Machinery Regulation to Annex I Section B, allows special-category data processing for bias detection under strict necessity, softens the AI literacy duty, extends SME relief to small mid-caps (fewer than 750 employees), and centralises AI Office supervision of GPAI-based systems from the same provider or integrated into VLOPs/VLOSEs. Proposal: 19 Nov 2025; failed trilogue 28 Apr 2026; political agreement 6-7 May 2026; Council final adoption 29 Jun 2026.

Source: cdp.cooley.com

WHAT COMES NEXT

DATES AS AMENDED BY REGULATION (EU) 2026/1744

2 Dec 2026

New prohibitions and end of Article 50(2) grace period

Omnibus bans on AI generating non-consensual intimate imagery ('nudifiers') and CSAM apply. Machine-readable marking becomes mandatory for generative systems that were already on the market before 2 Aug 2026.

digital-strategy.ec.europa.eu

2 Aug 2027

Legacy GPAI models and national sandboxes

Providers of GPAI models placed on the market before 2 Aug 2025 must comply; each Member State must have at least one AI regulatory sandbox operational (moved from 2 Aug 2026 by the Omnibus).

digital-strategy.ec.europa.eu

2 Dec 2027

Annex III high-risk obligations apply

Stand-alone high-risk use cases (employment, education, credit, law enforcement, migration, etc.) under Article 6(2); deferred 16 months from 2 Aug 2026 by the Omnibus.

digital-strategy.ec.europa.eu

2 Aug 2028

Annex I high-risk obligations apply

AI as safety components in regulated products (medical devices, toys, machinery, etc.) under Article 6(1); deferred 12 months from 2 Aug 2027 by the Omnibus.

digital-strategy.ec.europa.eu

2 Aug 2030

High-risk systems used by public authorities

Deadline for high-risk AI systems intended for use by public authorities (Article 111(2) as amended by the Omnibus).

artificialintelligenceact.eu

05 GPAI Code of Practice

VOLUNTARY CODE · 23 SIGNATORIES LISTED

Published 10 July 2025 by independent experts under the AI Office; three chapters (Transparency, Copyright, Safety and Security). Signing is voluntary but signatories benefit from a lighter compliance pathway, and the Commission has signalled closer scrutiny of non-signatories. Enforcement of GPAI obligations became possible on 2 Aug 2026; the Commission confirmed on 1 Sep 2026 that the AI Office had sent its first requests for information to more than 30 AI companies (as reported by Allegiance Law). The Commission's list shows 22 full signatories plus xAI (Safety and Security chapter only) as of 7 Oct 2026.

CHAPTER 1	CHAPTER 2	CHAPTER 3
Transparency	Copyright	Safety and Security

SIGNATORIES

COMMISSION LIST, DIGITAL-STRATEGY.EC.EUROPA.EU

01	AI Studio Delta	02	Aleph Alpha
03	Almawave	04	Amazon
05	Anthropic	06	Black Forest Labs
07	Bria AI	08	Cohere
09	Domyn	10	Dweve
11	Fastweb	12	Google
13	IBM	14	LINAGORA
15	Microsoft	16	Mistral AI
17	Open Hippo	18	OpenAI
19	Pleias	20	Reflection AI
21	ServiceNow	22	WRITER
23	*xAI (Safety and Security chapter only)*		

NOT SIGNED 4

- Meta (publicly declined, July 2025)
- Alibaba
- Baidu
- DeepSeek

22 + xAI (partial)
GPAI Code of Practice signatories
digital-strategy.ec.europa.eu

~190
Signatories of the Transparency Code (AI-generated content)
digital-strategy.ec.europa.eu

30+
AI companies sent first AI Office requests for information
allegiance.law

Source: https://digital-strategy.ec.europa.eu/en/policies/contents-code-gpai

06 Readiness ranking

27 MEMBER STATES · SORTED BY SCORE

#	MEMBER STATE	STATUS	READINESS	NATIONAL LAW	SANDBOX	PENALTIES	CONTACT POINT	PAGE
01	**Italy** IT	IN PLACE	90	Enacted	Planned	Adopted	Agenzia per la cybersicur…	p.25
02	**Finland** FI	IN PLACE	88	Enacted	Planned	Adopted	Traficom	p.19
03	**Ireland** IE	IN PLACE	88	Enacted	Planned	Adopted	AI Office of Ireland	p.24
04	**Denmark** DK	IN PLACE	85	Enacted	Operational	Adopted	Digitaliseringsstyrelsen	p.17
05	**Germany** DE	IN PLACE	85	Enacted	Planned	Adopted	Bundesnetzagentur	p.21
06	**Slovenia** SI	IN PLACE	85	Enacted	Planned	Adopted	AKOS - Agencija za komu…	p.35
07	**Malta** MT	IN PLACE	80	Enacted	Planned	Adopted	Malta Digital Innovation A…	p.29
08	**Hungary** HU	IN PLACE	76	Enacted	Planned	Adopted	AI Market Surveillance Au…	p.23
09	**Poland** PL	IN PLACE	75	Enacted	Planned	Adopted	Komisja Rozwoju i Bezpie…	p.31
10	**Greece** GR	IN PLACE	74	Enacted	Planned	Adopted	Hellenic Data Protection …	p.22
11	**Lithuania** LT	IN PLACE	74	Enacted	Operational	Not adopted	Communications Regulat…	p.27
12	**Cyprus** CY	PARTIAL	62	In consultation	Planned	Not adopted	Commissioner of Commu…	p.15
13	**Spain** ES	PARTIAL	60	Draft bill	Operational	Not adopted	AESIA - Agencia Español…	p.36
14	**Czechia** CZ	PARTIAL	45	Draft bill	Planned	Not adopted	Czech Telecommunicatio…	p.16
15	**Latvia** LV	PARTIAL	45	No bill yet	Planned	Not adopted	Consumer Rights Protecti…	p.26
16	**Netherlands** NL	PARTIAL	45	In consultation	Planned	Not adopted	Rijksinspectie Digitale Infr…	p.30
17	**Slovakia** SK	PARTIAL	45	Draft bill	Planned	Not adopted	MIRRI	p.34
18	**Luxembourg** LU	LAGGING	40	Draft bill	Planned	Not adopted	CNPD	p.28
19	**Sweden** SE	PARTIAL	40	In consultation	Planned	Not adopted	Post- och telestyrelsen	p.37
20	**France** FR	LAGGING	35	Draft bill	None	Not adopted	DGCCRF	p.20
21	**Estonia** EE	LAGGING	32	No bill yet	Planned	Not adopted	Consumer Protection and…	p.18
22	**Austria** AT	LAGGING	30	No bill yet	None	Not adopted	None designated	p.11
23	**Portugal** PT	LAGGING	30	No bill yet	Planned	Not adopted	ANACOM	p.32
24	**Belgium** BE	LAGGING	28	Draft bill	None	Not adopted	None designated	p.12
25	**Croatia** HR	LAGGING	20	Draft bill	None	Not adopted	None designated	p.14
26	**Romania** RO	LAGGING	20	No bill yet	None	Not adopted	ANCOM	p.33
27	**Bulgaria** BG	LAGGING	15	Draft bill	Planned	Not adopted	None designated	p.13

11 implementing laws enacted, **11** in draft or consultation, **5** with no bill yet.

3 sandboxes operational and **19** planned; the Omnibus moved the national sandbox deadline to 2 August 2027.

10 Article 99 penalty regimes adopted. Single point of contact shortened to its lead institution; the full designation is on each country page.

07 Country profiles

27 PROFILES · ONE PAGE EACH

One page per member state, alphabetically: status and score, authorities, law, penalties, sandbox, strategy, the latest developments, the opening of the analysis and the main sources. Each page links to the full web profile.

Austria 30
Lagging · AT · p.11
LAW No bill yet
SANDBOX None
PENALTIES Not adopted

Belgium 28
Lagging · BE · p.12
LAW Draft bill
SANDBOX None
PENALTIES Not adopted

Bulgaria 15
Lagging · BG · p.13
LAW Draft bill
SANDBOX Planned
PENALTIES Not adopted

Croatia 20
Lagging · HR · p.14
LAW Draft bill
SANDBOX None
PENALTIES Not adopted

Cyprus 62
Partial · CY · p.15
LAW In consultation
SANDBOX Planned
PENALTIES Not adopted

Czechia 45
Partial · CZ · p.16
LAW Draft bill
SANDBOX Planned
PENALTIES Not adopted

Denmark 85
In place · DK · p.17
LAW Enacted
SANDBOX Operational
PENALTIES Adopted

Estonia 32
Lagging · EE · p.18
LAW No bill yet
SANDBOX Planned
PENALTIES Not adopted

Finland 88
In place · FI · p.19
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

France 35
Lagging · FR · p.20
LAW Draft bill
SANDBOX None
PENALTIES Not adopted

Germany 85
In place · DE · p.21
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Greece 74
In place · GR · p.22
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Hungary 76
In place · HU · p.23
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Ireland 88
In place · IE · p.24
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Italy 90
In place · IT · p.25
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Latvia 45
Partial · LV · p.26
LAW No bill yet
SANDBOX Planned
PENALTIES Not adopted

Lithuania 74
In place · LT · p.27
LAW Enacted
SANDBOX Operational
PENALTIES Not adopted

Luxembourg 40
Lagging · LU · p.28
LAW Draft bill
SANDBOX Planned
PENALTIES Not adopted

Malta 80
In place · MT · p.29
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Netherlands 45
Partial · NL · p.30
LAW In consultation
SANDBOX Planned
PENALTIES Not adopted

Poland 75
In place · PL · p.31
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Portugal 30
Lagging · PT · p.32
LAW No bill yet
SANDBOX Planned
PENALTIES Not adopted

Romania 20
Lagging · RO · p.33
LAW No bill yet
SANDBOX None
PENALTIES Not adopted

Slovakia 45
Partial · SK · p.34
LAW Draft bill
SANDBOX Planned
PENALTIES Not adopted

Slovenia 85
In place · SI · p.35
LAW Enacted
SANDBOX Planned
PENALTIES Adopted

Spain 60
Partial · ES · p.36
LAW Draft bill
SANDBOX Operational
PENALTIES Not adopted

Sweden 40
Partial · SE · p.37
LAW In consultation
SANDBOX Planned
PENALTIES Not adopted

How to read
STATUS In place, Partial or Lagging: is the framework the Act requires legally in force?
SCORE 0–100 editorial judgement from the evidence on the page
PAGE where the one-page profile sits in this report

FACTS STRIP

Implementing-law status and date, Article 99 penalty regime, sandbox status, national strategy and the single point of contact, colour-coded green, amber or red.

LISTS ARE CAPPED

Up to four market surveillance authorities and eight sources are printed; a count notes what sits online.

DEVELOPMENTS

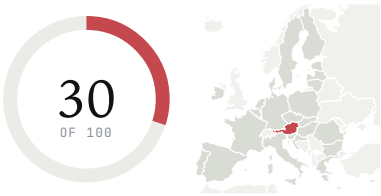
The three most recent dated events are printed, newest first; the full log is on the web profile.

VERIFICATION

Every file was re-checked on 22 Oct 2026; each page closes with its verification date.

LAGGING AT · RANK 22 OF 27 BY READINESS

Austria



More than a year after the 2 August 2025 deadline, Austria has still not designated a market surveillance authority, a notifying authority or a single point of contact under the AI Act, and no implementing bill has been tabled; the RTR-hosted KI-Servicestelle remains an advisory desk without enforcement powers.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
No bill yet	Not adopted	None	2021 AIM AT 2030 – Strategie der Bundesregierung fü…	None designated

KEY FINDINGS 5

- No market surveillance authority, notifying authority or single point of contact had been designated or notified to the Commission as of October 2026; Austria missed the 2 August 2025 deadline by more…
- The RTR KI-Servicestelle (legal basis § 20c KOG / § 194a TKG, BGBl I 6/2024) is an advisory and information body only; it cannot demand documentation or impose Article 99 fines.
- The 2025 government programme plans a 'KI-Behörde' built on the KI-Servicestelle inside RTR, but no draft law has been published and opposition MPs flag an advisory-versus-supervisory conflict of…
- Austria did complete its Article 77 fundamental-rights designations: Digital Austria lists the Volksanwaltschaft, the Datenschutzbehörde and the Parliamentary Data Protection Committee, KommAustria, t…
- No national penalty rules under Article 99 and no national sandbox exist; the 2021 AIM AT 2030 strategy predates generative AI and has not been updated.

SANDBOX NONE

No national AI regulatory sandbox has been established in Austria; a February 2026 white paper by the Austrian Federal Economic Chamber (WKO) argues for setting one up, and the Digital Omnibus pushed the E…

MARKET SURVEILLANCE AUTHORITIES NONE

None designated or confirmed as of 22 Oct 2026.

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW NO BILL YET

No AI Act implementing or accompanying law published (government programme foresees a 'KI-Behörde' built on the RTR KI-…

EARLIER DEVELOPMENTS 3 OF 6

JUL 2025	State Secretary Pröll concedes the AI authority will start late
JAN 2024	KI-Servicestelle created at RTR
SEP 2023	Federal 'KI-Maßnahmenpaket' announced

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

SEP 2026

Commission list still shows no Austrian single point of contact

The Commission's continuously updated list of single points of contact (last update 7 Sept 2026) has no entry for Austria, alongside Belgium,…

digital-strategy.ec.europa.eu

JUL 2026

Digital Omnibus ('Omnibus VII (KI)') takes effect

Regulation (EU) 2026/1744 was published in the Official Journal on 24 July 2026 and entered into force on 27 July 2026 (Digital Austria dates the…

digitalaustria.gv.at

OCT 2025

Green motion 'KI-Behörde endlich benennen' tabled in the Nationalrat

Motion 517/A(E) (15 Oct 2025) calls on the government to designate a notifying authority and a market surveillance authority immediately and…

parlament.gv.at

ANALYSIS OPENING; FULL TEXT ONLINE

Austria is an outlier among wealthier western member states: it built an early, well-resourced AI service desk at RTR in 2024, yet has not taken the legally decisive step of designating competent authorities under Article 70. The result is a governance gap in which Austrian deployers of high-risk systems have no national regulator to report serious incidents to, a point the Greens' October 2025 motion made explicitly. Digital Austria's official AI pages list only Article 77 fundamental-rights bodies, the KI-Beirat advisory council and the RTR desk.

SOURCES 7

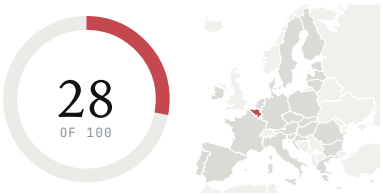
No AI Act implementing or accompanyi…	parlament.gv.at ↗
Regulatory sandbox	wko.at ↗
AIM AT 2030 – Strategie der…	digitalaustria.gv.at ↗
Commission list still…	digital-strategy.ec.europa.eu ↗
Digital Omnibus ('Omnibus VII (KI…	digitalaustria.gv.at ↗
KI-Servicestelle created at RTR	rtr.at ↗
Federal 'KI-Maßnahmenpaket' announced	futurezone.at ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/austria/**

Verified 22 Oct 2026

LAGGING BE · RANK 24 OF 27 BY READINESS

Belgium



Belgium missed the August 2025 designation deadline and, as of October 2026, still has no legally designated AI Act market surveillance authority; the federal coalition intends BIPT to be the central coordinator and contact point, but the enabling bill is still a preliminary draft at the FPS Economy and the federal-regional split of competences is unresolved.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill	Not adopted	None	2022 National Convergence Plan for the…	None designated

KEY FINDINGS 5

- No market surveillance authority, notifying authority or single point of contact has been designated in law or notified to the Commission; the Commission's SPOC list (7 Sept 2026) shows no Belgian entry.
- BIPT is the intended lead and central contact point under the 2025-2029 coalition agreement, but the FPS Economy is still drafting the preliminary bill and parliament has not received it.
- Supervision of AI in regional competences such as education and employment services needs a federal-regional arrangement that is still pending, a structural reason for Belgium's delay.
- According to the CMS AI regulation guide, Belgium designated 21 bodies as Article 77 fundamental-rights authorities; these are not market surveillance or notifying authorities.
- Until the law passes, AI Act rights in Belgium are enforceable only through the courts; no national penalty rules or sandbox exist.

SANDBOX NONE

No national AI regulatory sandbox is operational in Belgium, and with no competent authority yet designated none can be established under the Act; the EU deadline was moved to 2 August 2027 by the Digital…

MARKET SURVEILLANCE AUTHORITIES NONE

None designated or confirmed as of 22 Oct 2026.

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW DRAFT BILL

Preliminary draft bill (voorontwerp van wet) on AI Act supervision being prepared by the FPS Economy; not yet approved by the…

EARLIER DEVELOPMENTS 3 OF 6

DEC 2025	Minister Clarinval answers Senate question on AI supervision
AUG 2025	Belgium misses the Article 70 designation deadline
JAN 2025	Federal coalition agreement 2025-2029 gives BIPT the central AI Act role

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

SEP 2026

Chamber bill on deepfakes (protection of likeness and voice) filed

Chamber document 56K1728/001 (7 September 2026, MPs Leentje Grillaert and Steven Matheï) proposes a new neighbouring right in the Code …

dekamer.be

JUL 2026

VRT: 'strengere regels, maar geen toezichthouder'

On the eve of 2 August 2026, the FPS Economy confirmed to VRT that BIPT is the planned watchdog but that designation requires a law;…

vrt.be

APR 2026

Council of Ministers approves preliminary draft law on AI use by intelligence services

On 24 April 2026 the cabinet approved Justice Minister Annelies Verlinden's preliminary draft creating a legal framework for the intelligence…

vrt.be

ANALYSIS OPENING; FULL TEXT ONLINE

Belgium's delay is less about political reluctance than about its constitutional architecture. The AI Act touches federal competences (economy, telecoms, justice, finance) and regional ones (education, employment, housing), and the federal minister's December 2025 answer to the Senate makes clear that an inter-cabinet working group was still consulting the regions on who supervises what. The chosen design is a hub-and-spoke model: sectoral regulators keep their domains while BIPT, already Belgium's Digital Services Coordinator, provides technical expertise and serves as the single point of…

SOURCES 6

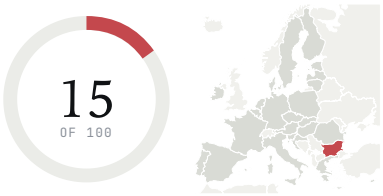
Preliminary draft bill (voorontwerp van wet) on AI …	vrt.be ↗
National Convergence Plan for the…	eubelius.com ↗
Chamber bill on deepfakes (protection of…	dekamer.be ↗
Council of Ministers approves preliminary draft la…	vrt.be ↗
Minister Clarinval answers Senate questio…	stijnderoo.be ↗
Belgium misses the…	digital-strategy.ec.europa.eu ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/belgium/**

Verified 22 Oct 2026

LAGGING BG · RANK 27 OF 27 BY READINESS

Bulgaria



Bulgaria has designated only its Article 77 fundamental-rights bodies; no market surveillance authority, notifying authority, single point of contact, penalty regime or sandbox exists, and the implementing bill was scheduled in the Council of Ministers' July-December 2026 legislative programme for consultation in September and tabling in October 2026, with the responsible minister saying in September that work was 'in its final stage'.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill	Not adopted	Planned	2020 Concept for the Development of…	None designated

KEY FINDINGS 5

- No Article 70 authorities have been designated; the Commission's single-point-of-contact list (7 Sept 2026) has no Bulgarian entry and the ministry itself confirmed in January 2026 that high-risk AI is…
- Lead responsibility moved from the Ministry of Electronic Governance to the new Ministry of Innovation and Digital Transformation, which sponsors the bill under the second-half-2026 legislative programme.
- The Bulgarian Accreditation Service is the proposed notifying authority per a draft decision; the market surveillance model was undecided as of early 2026.
- The internal target of March 2026 for a national framework was missed; the revised programme points to Council of Ministers tabling in October 2026, with parliamentary adoption still to follow.
- No penalty rules and no sandbox exist; the only strategic document is the 2020 Concept for AI development to 2030.

SANDBOX PLANNED

The planned implementing law is to create a national AI regulatory sandbox; a 2026 budget request for administrative capacity and a sandbox (about EUR 213,520) was rated low priority by the Finance…

MARKET SURVEILLANCE AUTHORITIES NONE

None designated or confirmed as of 22 Oct 2026.

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW DRAFT BILL

Закон за въвеждане на национални мерки по прилагане на Регламент (ЕС) 2024/1689 (Акт за изкуствения интелект) – Law…

EARLIER DEVELOPMENTS 3 OF 6

JUL 2026	Legislative programme July-December 2026 schedules the AI Act bill
JAN 2026	Ministry of Electronic Governance tells BTA there is no supervision of high-risk AI
JUN 2025	Council of Ministers Decision No. 398 designates seven Article 77 bodies

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

SEP 2026

Minister Vasilev: AI law 'in its final stage'

On 2 September 2026 Innovation and Digital Transformation Minister Ivan Vasilev told the parliamentary committee that work on the AI law…

news.bg

SEP 2026

MPs table a separate AI bill in the National Assembly

According to Fakti.bg, a group of MPs including Bozhidar Bozhanov submitted a Law on the Use and Development of Artificial Intelligence to the…

fakti.bg

AUG 2026

Draft Digital Transformation Strategy 2026-2030 in public consultation

The draft Strategy for Digital Transformation of Bulgaria 2026-2030 and its roadmap were in public consultation from 8 to 22 August 2026, covering …

strategy.bg

ANALYSIS OPENING; FULL TEXT ONLINE

Bulgaria sits at the back of the EU-27 on AI Act governance. Its own ministry's January 2026 disclosures to BTA are unusually candid: no market surveillance authority, no sanctions regime, no coordination model and an interagency working group that was still being formed months after the 2 August 2025 deadline. Capacity, not policy disagreement, is the stated bottleneck, with the ministry citing lack of expertise, infrastructure needs and complex institutional coordination, and the Finance Ministry deprioritising even a modest sandbox budget line.

SOURCES 6

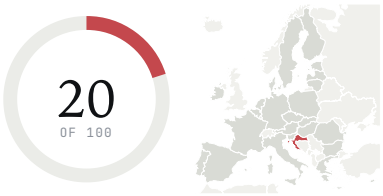
Закон за въвеждане на национални мерк…	strategy.bg ↗
Concept for the Development of Artificial…	oecd.ai ↗
Minister Vasilev: AI law 'in its final stage'	news.bg ↗
MPs table a separate AI bill in the National…	fakti.bg ↗
Draft Digital Transformation Strategy 2026-…	strategy.bg ↗
Ministry of Electronic Governance tells BTA there i…	bta.bg ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/bulgaria/**

Verified 22 Oct 2026

LAGGING HR · RANK 25 OF 27 BY READINESS

Croatia



Croatia notified its Article 77 fundamental-rights bodies in December 2024 but has designated no market surveillance authority, notifying authority or single point of contact; the implementing act (Zakon o provedbi Uredbe (EU) 2024/1689) was scheduled for Q1 2026 in the Sabor's EU-alignment plan, yet the MPUDT working group page still describes the bill as being in preparation and the Commission's list shows no Croatian single point of contact.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill	Not adopted	None	None identified	None designated

KEY FINDINGS 5

- No Article 70 authorities designated or notified as of October 2026; the only AI Act designations are the seven Article 77 fundamental-rights bodies from December 2024.
- The implementing act is being drafted by a 42-member MPUDT working group (ministries, AZOP, Ombudsperson, CARNET, universities, chambers, CroAI); its page describes a draft bill (nacrt…
- The Q1 2026 target in the Sabor's EU-alignment plan has passed without an adopted act.
- AZOP is a candidate for market surveillance in the data-protection-heavy Annex III areas but has only an Article 77 role today; no national penalty rules or sandbox exist.
- Croatia has no adopted national AI strategy; the National AI Development Plan to 2032 is still in preparation.

SANDBOX NONE

No national AI regulatory sandbox is operational in Croatia, and with no competent authority yet designated none can be established under the Act; the EU deadline was moved to 2 August 2027 by the Digital…

MARKET SURVEILLANCE AUTHORITIES NONE

None designated or confirmed as of 22 Oct 2026.

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW DRAFT BILL

Zakon o provedbi Uredbe (EU) 2024/1689 (Akt o umjetnoj inteligenciji) – Act implementing Regulation (EU) 2024/1689

EARLIER DEVELOPMENTS 2 OF 5

MAY 2025	Government launches drafting of a National AI Development Plan to 2032
DEC 2024	Croatia notifies seven Article 77 fundamental-rights authorities

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

SEP 2026

Commission list still has no Croatian single point of contact

The Commission's SPOC list (last update 7 Sept 2026) shows no entry for Croatia; a 42-member MPUDT working group chaired by Brankica…

mpudt.gov.hr

MAR 2026

Sabor's 2026 EU-alignment plan schedules the AI implementing act for Q1

The Plan for the Alignment of Croatian Legislation with the EU Acquis for 2026 (adopted by the Sabor 6 March, published NN 26/2026 on 13 March) lis…

narodne-novine.nn.hr

AUG 2025

Article 70 designation deadline missed

No market surveillance or notifying authority was notified by 2 August 2025. Civil society (Politiscope, an EDRi member, in May 2025) had…

edri.org

ANALYSIS OPENING; FULL TEXT ONLINE

Croatia was an early mover on the easy part of AI Act governance, notifying its fundamental-rights authorities within weeks of the November 2024 deadline, but has stalled on the hard part. Responsibility sits with MPUDT, which is simultaneously drafting the implementing act and the national AI development plan. The size of the working group (42 members spanning regulators, academia and industry) signals an inclusive process but also explains the slow pace; a year on from the Article 70 deadline the bill is still being drafted.

SOURCES 5

Zakon o provedbi Uredbe (EU)…	narodne-novine.nn.hr ↗
Commission list still has no Croatian single…	mpudt.gov.hr ↗
Article 70 designation deadline missed	edri.org ↗
Government launches drafting of a National …	tportal.hr ↗
Croatia notifies seven Article 77…	mpudt.gov.hr ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/croatia/**

Verified 22 Oct 2026

PARTIALLY IN PLACE CY · RANK 12 OF 27 BY READINESS

Cyprus



Cyprus designated its AI Act authorities by Council of Ministers decision in January 2025, centralising the notifying, market surveillance and single-point-of-contact roles in the Commissioner of Communications (OCECPR), and in August 2026 put a full 'Artificial Intelligence Law of 2026' with Article 99-level fines and a sandbox out for consultation; the law and penalty regime are not yet enacted.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
In consultation Aug 2026	**Not adopted**	**Planned**	**2020** National Artificial Intelligence Strategy…	Commissioner of Communications (OCECPR) – listed by the Commission as 'pending final adoption'

KEY FINDINGS 5

- Cyprus chose a centralised model: OCECPR is notifying authority, market surveillance authority and single point of contact by Council of Ministers decision of 22 January 2025, well ahead of the August…
- The designation rests on a cabinet decision, not statute; the Commission lists OCECPR as 'pending final adoption' and the AI Law of 2026 is meant to give it a legal base and an AI Regulation…
- National penalties mirroring Article 99 (up to EUR 35m or 7%, per Cyprus Mail), and a sandbox are in the draft law, whose consultation closed 16 September 2026; parliamentary passage is still ahead.
- The Data Protection Commissioner (Annex III points 1, 6, 7 and 8 and Article 5 prohibitions) and, under the draft law, the Central Bank of Cyprus hold sectoral market surveillance roles; Article 77…
- A separate deepfake law passed in March 2026 and a new 2032 AI strategy is in preparation, but the 2020 strategy remains the only adopted one.

SANDBOX PLANNED

The 2026 draft law provides for an AI Regulatory Sandbox for startups and researchers to test systems under real-world conditions; not yet operational.

MARKET SURVEILLANCE AUTHORITIES 3

Office of the Commissioner of Electronic Communications and Posta…
Market surveillance authority (general), notifying authority and single point of contact by Council of Ministers decision of 22 Jan 2025; a 2026 amending bill…

Commissioner for Personal Data Protection
Market surveillance authority for high-risk AI systems in Annex III points 1, 6, 7 and 8 (biometrics, law enforcement, migration, justice) and enforcement of the…

Central Bank of Cyprus
Supervision of high-risk AI systems used by financial institutions (per the 2026 draft law)

NOTIFYING AUTHORITY

Office of the Commissioner of Electronic Communications and Postal Regulation (OCECPR)

IMPLEMENTING LAW IN CONSULTATION

Ο περί της Τεχνητής Νοημοσύνης Νόμος του 2026 (Artificial Intelligence Law of 2026), with a parallel amending bill creating an …

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

SEP 2026

Commission list records OCECPR as SPOC 'pending final adoption'

The Commission's single-point-of-contact list (7 Sept 2026) names the Commissioner of Communications for Cyprus with an asterisk…

digital-strategy.ec.europa.eu

AUG 2026

AI Law of 2026 put out for public consultation with EUR 35m fines

Two bills entered e-consultation until 16 September 2026. According to Cyprus Mail, the AI Law of 2026 sets fines up to EUR 35m or 7% of…

cyprus-mail.com

JUL 2026

Draft National AI Strategy to 2032 opened for consultation

On 22 July 2026 the Deputy Ministry launched public consultation on the National AI Strategy prepared by the National AI Taskforce, aiming to…

cbn.com.cy

ANALYSIS OPENING; FULL TEXT ONLINE

Cyprus is the clearest example in this group of a small state using a cabinet decision to meet the governance deadline on time and then backfilling the legislation. Concentrating the three Article 70 functions in the telecoms and postal regulator avoids the coordination problems that have paralysed Belgium and Austria, and OCECPR's lead on the 2026 bill shows the regulator itself is driving the design, including a dedicated AI Regulation Directorate inside its office.

SOURCES 7

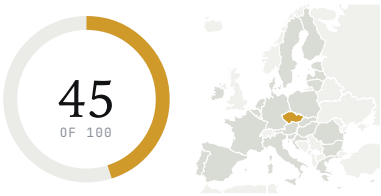
Office of the Commissioner of Electronic…	gov.cy ↗
Central Bank of Cyprus	cyprus-mail.com ↗
Ο περί της Τεχνητής Νοημοσύνης Νόμος του…	oeb.org.cy ↗
National Artificial Intelligence Strategy of Cyprus…	oecd.ai ↗
Commission list recor…	digital-strategy.ec.europa.eu ↗
Draft National AI Strategy to 2032 opened for…	cbn.com.cy ↗
House approves deepfake legislation	legal500.com ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/cyprus/**

Verified 22 Oct 2026

PARTIALLY IN PLACE CZ · RANK 14 OF 27 BY READINESS

Czechia



Czechia has a settled design (ČTÚ as main market surveillance authority and single point of contact, ÚNMZ as notifying authority, ČNB and ÚOOÚ for their sectors) and a short 'adaptation' AI Act in the pipeline, but the Government Legislative Council interrupted its consideration of the bill (čj. 503/26) on 6 August 2026 and the legislative record shows no government approval or Chamber of Deputies print, so none of the designations is yet in law.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill Sep 2025	**Not adopted**	**Planned**	**2024** Národní strategie umělé inteligence České…	Czech Telecommunication Office (ČTÚ) – listed by the Commission as 'pending final adoption'

KEY FINDINGS 5

- Czechia's authority model is fixed in policy but not in law: ČTÚ (market surveillance, SPOC), ÚNMZ (notifying), ČNB and ÚOOÚ (sectoral); according to CMS, the Public Defender of Rights and…
- The Commission lists ČTÚ as Czech single point of contact 'pending final adoption'.
- The draft law missed the 2 August 2025 deadline and its 2026 target; the Legislative Council interrupted its consideration on 6 August 2026 and the ODok record shows no government approval or Chamber…
- Disputes with ÚOOÚ and NÚKIB over the new duties, and Finance Ministry insistence that ČTÚ and the Industry Ministry fund oversight from their own budgets (reported by Česká justice, November 2025…
- No national penalty rules or operational sandbox yet; ČAS is tasked with creating the sandbox and the NAIS 2030 strategy (2024) is current.

SANDBOX PLANNED

The government's May 2025 implementation plan makes the Czech Standardization Agency (ČAS) responsible for creating the national AI regulatory sandbox, and the Ministry of Industry and Trade's Septembe…

MARKET SURVEILLANCE AUTHORITIES 3

Český telekomunikační úřad (ČTÚ – Czech Telecommunication Office)
Main market surveillance authority and single point of contact under the draft law; already issuing Article 50 transparency guidance

Česká národní banka (ČNB – Czech National Bank)
Market surveillance for AI systems in the regulated financial sector (draft law)

Úřad pro ochranu osobních údajů (ÚOOÚ – Office for Personal Data…
Market surveillance where AI use overlaps personal data protection; also an Article 77 body (draft law)

NOTIFYING AUTHORITY

Úřad pro technickou normalizaci, metrologii a státní zkušebnictví (ÚNMZ – Office for Standards, Metrology and Testing) – proposed

IMPLEMENTING LAW DRAFT BILL

Návrh zákona o umělé inteligenci a o změně některých souvisejících zákonů (Draft Act on Artificial Intelligence and amending certain…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

AUG 2026

Government Legislative Council interrupts consideration of the bill

At its 336th session on 6 August 2026 the Legislativní rada vlády took the draft Act on Artificial Intelligence (submitter: Industry and Tra…

vlada.gov.cz

JUL 2026

ČTÚ issues guidance ahead of the 2 August 2026 transparency rules

ČTÚ's 31 July 2026 press release explains the Article 50 obligations and states that compliance will be supervised by member-state market…

ctu.gov.cz

APR 2026

Chamber subcommittee hears the draft AI law

On 23 April 2026 the Subcommittee for ICT, AI, Digital Economy and Crypto-assets heard the government AI plenipotentiary, MPO, ČTÚ and…

psp.cz

ANALYSIS OPENING; FULL TEXT ONLINE

Czechia illustrates the gap between a clear administrative plan and legislative delivery. By mid-2025 the government had chosen a minimalist 'adaptation act' that avoids restating EU obligations and simply names authorities, procedures and sanctions, with ČTÚ as hub. ČTÚ is already behaving as the regulator, publishing Article 50 guidance before 2 August 2026, and the Commission has pencilled it in as single point of contact. What is missing is a statute conferring investigative and fining powers.

SOURCES 7

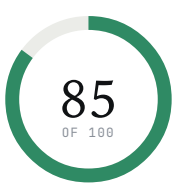
Český telekomunikační úřad (ČTÚ – Czech…	ctu.gov.cz ↗
Česká národní banka (ČNB – Czech National…	mpo.gov.cz ↗
Návrh zákona o umělé inteligenci a o změně…	odok.gov.cz ↗
Regulatory sandbox	mpo.gov.cz ↗
Národní strategie umělé inteligence České…	mpo.gov.cz ↗
Government Legislative Council interrupts…	vlada.gov.cz ↗
Chamber subcommittee hears the draft AI law	psp.cz ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/czechia/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE DK · RANK 4 OF 27 BY READINESS

Denmark



Denmark was one of the first member states to enact an AI Act implementing law (Law No. 467 of 14 May 2025, in force 2 August 2025) designating the Agency for Digital Government as coordinating market surveillance authority, notifying authority and single point of contact; a fuller replacement 'AI-loven' lapsed with the spring 2026 election but was re-introduced as bill L 3 on 7 October 2026 with first reading set for 5 November 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted May 2025	**Adopted**	**Operational**	**2024** Strategisk indsats for kunstig intelligens…	Digitaliseringsstyrelsen (Agency for Digital Government) – listed by the Commission without reservation

KEY FINDINGS 5

- Denmark met the 2 August 2025 deadline with an enacted statute; the Commission lists the Agency for Digital Government as single point of contact without a 'pending' flag.
- Three market surveillance authorities operate under Law 467/2025: Digitaliseringsstyrelsen (coordinating), Datatilsynet (Article 5(1)(d) and (g) prohibitions) and Domstolsstyrelsen (courts' non-judicial use of…
- Penalties are in place via Law 467/2025 (criminal fines under § 10); the pending AI-loven would add administrative-style enforcement with fines and publication of decisions.
- The replacement AI-loven (L 111) was derailed by the March 2026 election and lapsed, but was re-tabled as L 3 on 7 October 2026.
- The joint Datatilsynet/DIGST AI sandbox has published case reports; the December 2024 Strategic Approach to AI is the current strategy.

SANDBOX OPERATIONAL

A joint Datatilsynet/Digitaliseringsstyrelsen regulatory sandbox for AI gives selected companies and public bodies free guidance on GDPR and AI Act risk classification; final reports from the latest cases (Børns Vilkår…

MARKET SURVEILLANCE AUTHORITIES 3

Digitaliseringsstyrelsen (Danish Agency for Digital Government)
Nationally coordinating supervisory authority for the AI Regulation; under Law 467/2025 also notifying authority, single point of contact and market…

Datatilsynet (Danish Data Protection Authority)
Market surveillance authority for Article 5(1)(d) and (g) prohibited practices; co-runs the regulatory AI sandbox

Domstolsstyrelsen (Danish Court Administration)
Market surveillance authority for AI systems used in the administration of justice, where courts are not acting in a judicial capacity

NOTIFYING AUTHORITY

Digitaliseringsstyrelsen (Danish Agency for Digital Government)

IMPLEMENTING LAW ENACTED

Lov nr. 467 af 14. maj 2025 om supplerende bestemmelser til forordningen om kunstig intelligens (in force 2 Aug 2025);…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

OCT 2026
AI-loven re-introduced as L 3
Minister for Research, Higher Education and Digitalisation Christina Egelund introduced L 3 on 7 October 2026; it repeals Law 467, carries over …
folketingstidende.dk

JUN 2026
Sandbox final reports published
Digitaliseringsstyrelsen published the June 2026 final reports from the sandbox cases with BrainCapture ApS (automated interpretation of…
digst.dk

MAY 2026
DIGST updates its AI Act guidance for the AI omnibus
Following the 7 May 2026 political agreement on the AI omnibus, the Agency for Digital Government said it was updating its AI Regulation pages and…
digst.dk

ANALYSIS OPENING; FULL TEXT ONLINE

Denmark treated AI Act governance as a sequencing problem and solved the first step early: a short law in May 2025 that named the authorities and gave them enough powers for the prohibitions, GPAI and transparency phases. That choice is why Denmark has an unqualified entry on the Commission's authority list, and it meant the 2 August 2025 and 2 August 2026 milestones arrived with a functioning regulator in place.

SOURCES 8

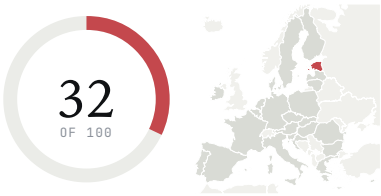
Digitaliseringsstyrelsen (Danish Agency for Digit…	digst.dk ↗
Datatilsynet (Danish Data Protectio…	retsinformation.dk ↗
Regulatory sandbox	digst.dk ↗
Strategisk indsats for kunstig intelligens (Strategic…	ft.dk ↗
AI-loven re-introduced as L 3	folketingstidende.dk ↗
General election lapses L 111	lex.dk ↗
Replacement bill L 111 'AI-loven'…	folketingstidende.dk ↗
Folketing adopts Law No. 467/2025	folketingstidende.dk ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/denmark/**

Verified 22 Oct 2026

LAGGING EE · RANK 21 OF 27 BY READINESS

Estonia



Estonia has signalled to the Commission that the Consumer Protection and Technical Regulatory Authority (TTJA) will be its single point of contact and lead AI Act supervisor, but the designation is listed as 'pending final adoption', TTJA itself says it will act as competent authority 'in future', and no national implementing act naming supervisors, setting penalty procedures or creating a sandbox has been published as of October 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
No bill yet	Not adopted	Planned	2024 Tehisintellekti tegevuskava 2024–2026…	Consumer Protection and Technical Regulatory Authority (TTJA) – listed by the Commission as 'pending final adoption'

KEY FINDINGS 5

- TTJA is the de facto designated supervisor and single point of contact, but the Commission lists it as 'pending final adoption' and TTJA's own page frames its role as prospective.
- No implementing act, penalty procedure or notifying-authority designation has been published; Estonia relies on direct application of the Regulation and existing product-safety and data-protection…
- Estonia has listed the Data Protection Inspectorate (AKI), the Gender Equality and Equal Treatment Commissioner and TTJA as fundamental-rights authorities under Article 77; this is not a market…
- Responsibility for AI policy sits with the Ministry of Justice and Digital Affairs, which has issued transparency guidance but no implementing act.
- The 2024-2026 AI Action Plan is the strategic framework; a planned AI competence centre and sandbox are not yet operational.

SANDBOX PLANNED

The government's Digital Society Programme 2026-2029 states that an AI competence centre will be created and a technical and regulatory sandbox launched to let products be developed and tested before mar…

MARKET SURVEILLANCE AUTHORITIES 1

Tarbijakaitse ja Tehnilise Järelevalve Amet (TTJA – Consumer…
Planned lead market surveillance authority for AI systems (products such as machinery, toys, lifts, and later Annex III areas) and single point of contact;…

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW NO BILL YET

No national implementing act adopted; no act naming supervisory authorities, a penalty procedure or a sandbox basis has been…

MOST RECENT DEVELOPMENTS 3 OF 4 · NEWEST FIRST

SEP 2026
TTJA updates its AI page but still describes its role as future
TTJA's AI systems page (updated 10 Sept 2026) says it 'will in future' act as competent authority, describes planned powers (access to datasets,…
ttja.ee

AUG 2026
Ministry of Justice and Digital Affairs explains Article 50 transparency rules
On 5 August 2026 the Ministry of Justice and Digital Affairs published guidance on the transparency obligations in force since 2 August…
justdigi.ee

JAN 2026
TTJA 2026 risk forecast rates AI non-compliance a significant risk
TTJA's annual threat assessment (Ohuprognoos 2026, approved by the Director General on 5 January 2026) rates non-compliance of AI syste…
ttja.ee

ANALYSIS OPENING; FULL TEXT ONLINE

Estonia's reputation as a digital-government leader contrasts with a slow formal AI Act implementation. The country's instinct has been to avoid new law and fold the Regulation into existing structures: TTJA already does product market surveillance under Regulation 2019/1020, AKI covers data protection, and the Ministry of Justice and Digital Affairs issues guidance. That approach produced an early single-point-of-contact signal to Brussels but not the statute needed to give TTJA fining powers under Article 99 or to establish the notifying authority.

SOURCES 6

Tarbijakaitse ja Tehnilise Järelevalve Amet (TTJA …	ttja.ee ↗
Regulatory sandbox	fin.ee ↗
Tehisintellekti tegevuskava 2024–2026 (National A…	mkm.ee ↗
Ministry of Justice and Digital Affairs explain…	justdigi.ee ↗
TTJA 2026 risk forecast rates AI non-compliance…	ttja.ee ↗
Article 70 deadline…	digital-strategy.ec.europa.eu ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/estonia/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE FI · RANK 2 OF 27 BY READINESS

Finland



Finland's Act on the Supervision of Certain AI Systems (1377/2025), signed 22 December 2025 and in force since 1 January 2026, establishes a decentralised model with eight sectoral market surveillance authorities, Traficom as single point of contact and host of a sanctions board, four notifying authorities and national fines mirroring Article 99; the statutory basis for the Traficom-run regulatory sandbox and a high-risk register for critical infrastructure is handled in a separat…

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Dec 2025	**Adopted**	**Planned**	**None** identified	Traficom (Finnish Transport and Communications Agency) – listed by the Commission without reservation

KEY FINDINGS 5

- Finland has a fully enacted framework: Act 1377/2025 in force since 1 January 2026 names eight sectoral market surveillance authorities, four notifying authorities and Traficom as single point of contact.
- National penalties track the Article 99 maxima; fines are imposed by a sanctions board hosted at Traficom on proposal from the competent market surveillance authority.
- The Commission lists Traficom as Finland's single point of contact without a 'pending' flag.
- The Article 57 sandbox is in a Traficom pilot phase (September 2026 to April 2027) with full service starting on 3 May 2027; a separate second-phase amendment is meant to give it a statutory basis and…
- Traficom's August 2026 guidance makes it the main supervisor of the Article 50 transparency obligations.

SANDBOX PLANNED

Traficom is running a pilot and development phase of the national AI regulatory sandbox from September 2026 to the end of April 2027 (applications via Suomi.fi), with the full service starting on 3 May 2027. …

MARKET SURVEILLANCE AUTHORITIES 8

Liikenne- ja viestintävirasto Traficom (Finnish Transport and…
Single point of contact (§ 6); market surveillance for recreational craft and radio equipment product rules (Annex I) and for AI in road traffic and critical digital…

Turvallisuus- ja kemikaalivirasto Tukes (Finnish Safety and Chemical…
Market surveillance for lifts, ATEX, pressure equipment, gas appliances, toys and consumer machinery and PPE (Annex I) and gas and water critical…

Energiavirasto (Energy Authority)
Market surveillance for AI safety components in heating, electricity and gas network operation (Annex III critical infrastructure)

Tietosuojavaltuutettu (Data Protection Ombudsman)
Market surveillance for Annex III areas 1, 3, 4 and 6-8 (biometrics, education, employment, law enforcement, migration, justice) and area 5(b) outside…

+ 4 further authorities listed online

NOTIFYING AUTHORITY

Four notifying authorities under § 8: the Ministry of Economic Affairs and Employment, Traficom, Fimea and the Ministry of Social Affairs and…

IMPLEMENTING LAW ENACTED

Laki eräiden tekoälyjärjestelmien valvonnasta (1377/2025) – Act on the Supervision of Certain Artificial Intelligence Systems

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

AUG 2026

Traficom publishes transparency guidance and opens an AI Act service channel

On 20 August 2026 Traficom issued guidance on the new transparency obligations, stated that it is the main supervisor of those obligations in Finla…
traficom.fi

MAR 2026

Finanssivalvonta briefs supervised entities on AI supervision

FIN-FSA's supervisory briefing of 5 March 2026 set out its role under Act 1377/2025 and showed the national AI supervision law as complemente…
finanssivalvonta.fi

JAN 2026

Supervisory powers take effect

From 1 January 2026 the designated authorities can enforce the Act, and the Traficom-hosted sanctions board can impose administrative fines…
finlex.fi

ANALYSIS OPENING; FULL TEXT ONLINE

Finland chose the most decentralised design in this group and wrote it into law in detail. Rather than a single AI regulator, Act 1377/2025 maps each Annex I product regime and each Annex III use case to an existing authority, from Tukes for lifts and pressure equipment to the Data Protection Ombudsman for biometrics, education, employment and migration systems, and Finanssivalvonta for financial-sector uses. Traficom's coordinating role, the shared sanctions board and the ministry-level notifying authorities keep the system coherent. The result scores highly on completeness even thoug…

SOURCES 6

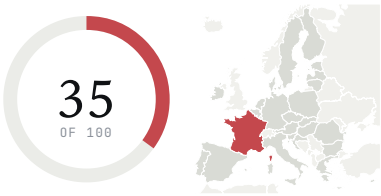
Liikenne- ja viestintävirasto Traficom (Finnish…	finlex.fi ↗
Regulatory sandbox	traficom.fi ↗
Traficom publishes transparency guidance…	traficom.fi ↗
Finanssivalvonta briefs supervised…	finanssivalvonta.fi ↗
Supervisory powers take effect	finlex.fi ↗
Government proposal HE 46/2025…	hannessnellman.com ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/finland/**

Verified 22 Oct 2026

LAGGING FR · RANK 20 OF 27 BY READINESS

France



France still has no enacted designation of AI Act authorities: the DDADUE omnibus bill carrying the scheme (DGCCRF coordinating, CNIL for prohibited practices and most Annex III uses, Arcom and existing sector regulators) passed the Senate on 18 February 2026 but has sat in committee at the Assemblée nationale since, more than a year after the 2 August 2025 deadline.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill Feb 2026	**Not adopted**	**None**	**2025** Stratégie nationale pour l'intelligence…	DGCCRF (proposed; listed as 'pending' on the European Commission's national authorities page as of 7 September 2026)

KEY FINDINGS 5

- No French authority has legally been designated under Articles 28 or 70 of the AI Act as of 22 October 2026; the designation sits in Article 24 of the DDADUE omnibus bill awaiting Assemblée nationale first…
- The chosen model is decentralised: DGCCRF coordinates and is the proposed single point of contact, CNIL takes prohibited practices and most Annex III uses, Arcom handles certain transparency dutie…
- No national penalty rules under Article 99 are in force. Senate amendments give CNIL, Arcom and DGE sanctioning powers, but nothing is enacted.
- No Article 57 regulatory sandbox exists in law; the bill only authorises future ordinances on AI regulation, including sandbox rules.
- The Digital Omnibus (Regulation (EU) 2026/1744) gives France until December 2027 for most high-risk enforcement, but Article 50 transparency duties already apply, and the penalty and governance…

SANDBOX NONE

No national AI regulatory sandbox under Article 57 has been established in law; government amendment no. 440, adopted by the Senate, would authorise the government to legislate by ordinance on the sandbox and…

MARKET SURVEILLANCE AUTHORITIES 4

Direction générale de la concurrence, de la consommation et de la…
Proposed coordinating market surveillance authority and single point of contact (Art. 70(2)), working with DGE; also supervises toys and vocational training.…

Commission nationale de l'informatique et des libertés (CNIL)
Proposed market surveillance authority for prohibited practices and for most Annex III high-risk uses (biometrics, employment, parts of law enforcement,…

Autorité de régulation de la communication audiovisuelle et numériq…
Proposed authority for the Article 5(1)(a) and (b) prohibitions and for Article 50 transparency obligations (some jointly with DGCCRF; exclusive for AI-generat…

Existing sector regulators (e.g. ACPR for finance, ANFR for radio…
Decentralised model: roughly fifteen sectoral entities would supervise AI systems in their fields; ANSSI and PEReN provide technical expertise rather…

NOTIFYING AUTHORITY

Proposed only: Direction générale des entreprises (DGE) as notifying authority for toys under Senate amendment no. 444; no general Article …

IMPLEMENTING LAW DRAFT BILL

Projet de loi portant diverses dispositions d'adaptation au droit de l'Union européenne (DDADUE), Article 24 on Regulation (EU)…

MOST RECENT DEVELOPMENTS 3 OF 7 · NEWEST FIRST

SEP 2026

Commission still lists France's single point of contact as pending

The European Commission's market surveillance authorities page (last updated 7 September 2026) lists DGCCRF for France with an asterisk markin…

digital-strategy.ec.europa.eu

JUL 2026

Digital Omnibus on AI postpones high-risk deadlines

Regulation (EU) 2026/1744 entered into force on 27 July 2026, deferring Annex III high-risk obligations to 2 December 2027 and Annex I to …

actuia.com

JUL 2026

Written question cites Cour des comptes on the AI coordinator vacancy

Written question no. 16957 (Journal officiel of 14 July 2026) cited the Cour des comptes' November 2025 report as finding that the national AI strate…

questions.assemblee-nationale.fr

ANALYSIS OPENING; FULL TEXT ONLINE

France chose a 'puzzle' rather than a single AI regulator. The DGE/DGCCRF scheme of September 2025 deliberately built on existing competences: companies already supervised by a sector regulator go to that regulator for AI Act matters, DGCCRF and DGE coordinate, and the CNIL, after government amendments in the Senate, becomes the lead for fundamental-rights-sensitive uses. The upside is deep sectoral expertise; the downside is that nothing works until Parliament enacts the whole allocation, and the vehicle chosen was a sprawling omnibus bill covering energy, transport, health and…

SOURCES 12

Direction générale de la…	presse.economie.gouv.fr ↗
Commission nationale de l'informatique et des…	senat.fr ↗
Autorité de régulation de la communication…	senat.fr ↗
Existing sector regulators (e.g…	banquedesterritoires.fr ↗
Notifying authority: Proposed only: Direction…	senat.fr ↗
Projet de loi portant diverses…	assemblee-nationale.fr ↗
Regulatory sandbox	senat.fr ↗
Stratégie nationale pour l'intelligence artificiel…	cciamp.com ↗

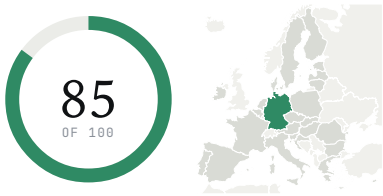
+ 4 more sources on the web page

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/france/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE DE · RANK 5 OF 27 BY READINESS

Germany



Germany's KI-MIG (Gesetz zur Marktüberwachung und Innovationsförderung von künstlicher Intelligenz, dated 22 July 2026) entered into force on 29 July 2026, making the Bundesnetzagentur the central AI market surveillance authority, single point of contact, complaints body and sandbox operator, with BaFin and other sector regulators keeping their fields.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Jul 2026	**Adopted**	**Planned**	**2018** Strategie Künstliche Intelligenz der…	Bundesnetzagentur, Zentrale Anlaufstelle (§ 6 KI-MIG)

KEY FINDINGS 5

- The KI-MIG is in force since 29 July 2026, almost a year after the 2 August 2025 designation deadline and days before the 2 August 2026 application date for transparency duties.
- The Bundesnetzagentur is the central (residual) market surveillance authority, single point of contact (§ 6), complaints body and coordination centre; BaFin, product-sector authorities and Land…
- National penalty provisions exist in Part 5 (§§ 15 to 17 KI-MIG): § 15 makes breaches of the AI Act's information, documentation, access, fundamental-rights-impact-assessment and explanation duties…
- A KI-Reallabor is mandated by § 13 and being set up by the Bundesnetzagentur, which has announced no opening date.
- Germany's model is hybrid rather than fully centralised, so operators in finance, media or harmonised product sectors must still identify their sector authority.

SANDBOX PLANNED

§ 13 KI-MIG obliges the Bundesnetzagentur to establish and operate at least one KI-Reallabor (with a regulation-making power for the digital ministry); the Bundesnetzagentur announced on 29 July 2026 that it is…

MARKET SURVEILLANCE AUTHORITIES 3

Bundesnetzagentur (BNetzA)
Central market surveillance authority with residual competence (§ 2(1) KI-MIG), including radio equipment and, within its remit, personnel management, critic…

Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)
Market surveillance for AI systems tied to regulated financial activity of the institutions it supervises (§ 2(3) KI-MIG).

Sector authorities for Annex I products and Land authorities for medi…
Hybrid model: authorities already competent for harmonised product legislation keep Annex I AI systems (§ 2(2)); Land-law authorities supervise media servic…

NOTIFYING AUTHORITY

No single notifying authority: § 3 KI-MIG allocates Article 28 notifying functions to the authorities already acting as notifying authorities under…

IMPLEMENTING LAW ENACTED

Gesetz zur Marktüberwachung und Innovationsförderung von künstlicher Intelligenz (KI-MIG)

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

SEP 2026
Commission list still shows Germany as 'pending'
The Commission's market surveillance authorities page (last updated 7 September 2026) lists the Bundesnetzagentur for Germany with an asterisk…
digital-strategy.ec.europa.eu

JUL 2026
KI-MIG enters into force; Bundesnetzagentur takes over AI…
The KI-MIG (promulgated 22 July 2026, BGBl. I 2026 Nr. 223) entered into force on 29 July 2026, when the Bundesnetzagentur announced that it…
bundesnetzagentur.de

JUL 2026
Digital Omnibus on AI shifts high-risk deadlines
Regulation (EU) 2026/1744, in force 27 July 2026, defers Annex III high-risk obligations to 2 December 2027 and Annex I to 2 August 2028,…
actuia.com

ANALYSIS OPENING; FULL TEXT ONLINE

Germany arrived late but arrived with a complete statute. After a change of government delayed the original plans, the Cabinet draft of February 2026 moved quickly through the Bundestag (11 June 2026) and Bundesrat (10 July 2026) and took effect on 29 July 2026, days before the AI Act's Article 50 transparency duties began to apply. The law gives the Bundesnetzagentur a residual competence: it supervises wherever no specialist authority is designated, and runs the central contact point, the complaints desk and a coordination and competence centre to support the other authorities with…

SOURCES 8

Bundesnetzagentur (BNetzA)	bundesnetzagentur.de ↗
Bundesanstalt für…	gesetze-im-internet.de ↗
Notifying authority: No single…	gesetze-im-internet.de ↗
Strategie Künstliche Intelligenz der…	bundesregierung.de ↗
Commission list still…	digital-strategy.ec.europa.eu ↗
Digital Omnibus on AI shifts high-risk deadlines	actuia.com ↗
Bundestag passes the KI-MIG	lto.de ↗
Federal Cabinet adopts the KI-MI…	dserver.bundestag.de ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/germany/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE GR · RANK 10 OF 27 BY READINESS

Greece

74
OF 100



Greece enacted Law 5321/2026 (Government Gazette A' 114, 20 July 2026), making the Hellenic Data Protection Authority the main market surveillance authority and single point of contact and EETT the notifying authority and host of an AI coordination centre and sandbox, roughly a year after the designation deadline.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Jul 2026	**Adopted**	**Planned**	**2024** A Blueprint for Greece's AI…	Hellenic Data Protection Authority (listed by the European Commission as Greece's single point of contact)

KEY FINDINGS 5

- Law 5321/2026 (Gazette A' 114 of 20 July 2026) is Greece's complete AI Act implementing act, replacing the AI provisions of Law 4961/2022.
- The HDPA is both principal market surveillance authority (prohibited practices, Annex III, Article 50) and single point of contact; sector product authorities keep Annex I products.
- EETT is the notifying authority and hosts the AI Coordination and Expertise Centre and the regulatory sandbox, jointly run with the HDPA.
- Article 16 applies the administrative fines of Article 99 of the AI Act directly, adds periodic penalty payments of up to 2% of average daily worldwide turnover for non-compliance with a compliance order,…
- Resourcing of the HDPA is the open risk: its Opinion 9/2026 on the draft flagged that the new market surveillance role needs adequate staff and funding.

SANDBOX PLANNED

Article 12 of Law 5321/2026 establishes a national AI regulatory sandbox run by EETT with the HDPA as competent authority; providers apply following a call for applications. Article 13 provides for real-world testin…

MARKET SURVEILLANCE AUTHORITIES 2

Hellenic Data Protection Authority (ΑΠΔΠΧ / HDPA)
Principal market surveillance authority for prohibited practices (Chapter II), Annex III high-risk systems and Article 50 transparency obligations (Art. 3);…

Sectoral product authorities (e.g. EOF for medical devices, EETT for…
Market surveillance of Annex I high-risk AI embedded in products under their existing product legislation, with HDPA coordinating.

NOTIFYING AUTHORITY

Hellenic Telecommunications and Post Commission (EETT / EETT), Art. 5 of Law 5321/2026

IMPLEMENTING LAW ENACTED

Law 5321/2026, Measures for the implementation of Regulation (EU) 2024/1689 and amendment of Law 4961/2022 (ΦΕΚ Α'…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

DEC 2026

Public-sector AI registry deadline

According to EY Greece, public bodies must register AI systems already in operation in the new Unified Register of AI Systems by 31 December…

ey.com

JUL 2026

Law 5321/2026 passed and published in the Gazette

The bill was tabled in Parliament by 9 July 2026 and published as Law 5321/2026 in Government Gazette A' 114 on 20 July 2026. The law…

lawspot.gr

JUL 2026

Digital Omnibus on AI defers high-risk obligations

Regulation (EU) 2026/1744 (in force 27 July 2026) moved Annex III high-risk obligations to 2 December 2027 and Annex I to 2 August 2028, s…

actuia.com

ANALYSIS OPENING; FULL TEXT ONLINE

Greece moved from having no designated authorities to a fully enacted framework within weeks in summer 2026. The Ministry of Digital Governance's draft was consulted from 21 June to 6 July 2026, was in Parliament by 9 July and was gazetted on 20 July, almost a year after the 2 August 2025 designation deadline. The design is data-protection-centric: the HDPA takes the fundamental-rights-heavy work (prohibited practices, Annex III high-risk, transparency) and the European contact-point role, while EETT, the telecoms regulator, takes the technical infrastructure (notifying authori…

SOURCES 7

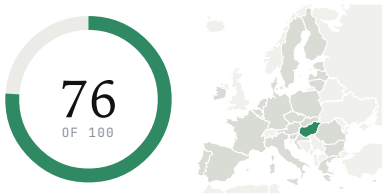
Hellenic Data Protection Authority (ΑΠΔΠΧ /…	lawspot.gr ↗
Sectoral product authorities (e.g. EOF for medical…	ey.com ↗
Law 5321/2026, Measures for the…	taxheaven.gr ↗
A Blueprint for Greece's AI…	foresight.gov.gr ↗
Digital Omnibus on AI defers high-risk…	actuia.com ↗
Draft implementing law put to public…	legal500.com ↗
National AI blueprint published	foresight.gov.gr ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/greece/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE HU · RANK 8 OF 27 BY READINESS

Hungary



Hungary has a complete national framework (Act LXXV of 2025 and Government Decree 344/2025, in force 1 December 2025) with a ministerial AI market surveillance authority, now housed in the Ministry of Science and Technology after a 2026 portfolio reshuffle, and the National Accreditation Authority as notifying authority.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Dec 2025	**Adopted**	**Planned**	**2020** Hungary's National Artificial Intelligenc…	AI Market Surveillance Authority within the Ministry of Science and Technology, designated under § 1(1)(c) of Government Decree 344/2025 (Article 70(2)); the…

KEY FINDINGS 5

- Hungary enacted a full framework by 1 December 2025: Act LXXV of 2025 plus Government Decree 344/2025 (X.31.), with a ministry-based AI market surveillance authority rather than an independent…
- The National Accreditation Authority is notifying authority; the MNB supervises AI in financial services; other sector regulators must consult the AI authority before compliance decisions.
- National penalty rules exist: Decree 344/2025 converts the Article 99 euro ceilings into forint maxima (up to HUF 13.3bn); the authority may also settle by written administrative agreement.
- The authority's ministerial home shifted in 2026: the 'minister responsible for business development' portfolio moved from the Minister for National Economy to the Minister of Economy and Ener…
- The Commission's public list still shows no Hungarian single point of contact as of September 2026, and no operational sandbox has been announced.

SANDBOX PLANNED

The sandbox and real-world testing provisions of Act LXXV of 2025 took effect on 2 August 2026; the AI market surveillance authority operates the sandbox. No operational sandbox cohort had been announced as of…

MARKET SURVEILLANCE AUTHORITIES 3

Minister responsible for science and technology (AI Market…
National AI market surveillance authority and single point of contact under Article 70. Decree 344/2025 designates the 'minister responsible for business…

Magyar Nemzeti Bank (MNB)
Sectoral market surveillance authority for high-risk AI systems used directly to provide financial services.

Sectoral authorities (where a sector regulator supervises the field)
Must obtain the AI market surveillance authority's opinion before deciding on AI Act compliance in their sector.

NOTIFYING AUTHORITY

Nemzeti Akkreditáló Hatóság (National Accreditation Authority), § 1(1)(a) of Government Decree 344/2025

IMPLEMENTING LAW ENACTED

Act LXXV of 2025 on the domestic implementation of the EU AI Regulation, with Government Decree 344/2025 (X.31.) on the AI…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

OCT 2026

Decree 344/2025 amended

Government Decree 224/2026 (X.1.) repealed § 5(1)(e) of Decree 344/2025 with effect from 2 October 2026; the designations of the notifying…

njt.jog.gov.hu

SEP 2026

Ministry splits AI Act duties across departments

An organisational instruction published in the Official Gazette on 21 September 2026 (effective 22 September) assigned market surveillance…

mlex.com

SEP 2026

Commission list still blank for Hungary

The Commission's market surveillance authorities page updated 7 September 2026 shows no entry for Hungary despite the domestic designation.

digital-strategy.ec.europa.eu

ANALYSIS OPENING; FULL TEXT ONLINE

Hungary was an early mover on paper. Act LXXV of 2025 and its implementing Government Decree 344/2025 were in force by 1 December 2025, four months after the EU designation deadline and well before most peers. The model is unusual in placing market surveillance and the single point of contact inside a government ministry, under a minister, rather than with an independent authority such as the data protection regulator (NAIH) or the media authority (NMHH). The decree also did the housekeeping many member states have skipped, converting the fine ceilings into forints.

SOURCES 8

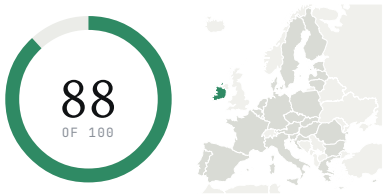
Minister responsible for science and…	njt.jog.gov.hu ↗
Magyar Nemzeti Bank (MNB)	cms.law ↗
Notifying authority: Nemzeti Akkreditáló…	njt.jog.gov.hu ↗
Regulatory sandbox	regulations.ai ↗
Ministry splits AI Act duties across departments	mlex.com ↗
Commission list still…	digital-strategy.ec.europa.eu ↗
Sandbox provisions take effect; portfolio…	gdpr.blog.hu ↗
Hungarian AI Council holds founding meeting	economx.hu ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/hungary/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE IE · RANK 3 OF 27 BY READINESS

Ireland



Ireland designated its first competent authorities by S.I. 366/2025 in July 2025, expanded the list to 15 regulators, and enacted the Regulation of Artificial Intelligence Act 2026 (No. 31 of 2026), signed 21 July and commenced 31 July 2026, creating the AI Office of Ireland as central coordinator and single point of contact with a full enforcement and penalties regime.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Jul 2026	**Adopted**	**Planned**	**2024** National AI Strategy Refresh 2024 ('AI: Her…	AI Office of Ireland (listed by the European Commission); previously the Minister for Enterprise, Tourism and Employment under S.I. 366/2025

KEY FINDINGS 5

- Ireland met the designation deadline in substance: S.I. 366/2025 named the first competent authorities and notifying authorities by July 2025 under a distributed model, expanded to 15 regulators in…
- The Regulation of Artificial Intelligence Act 2026 (No. 31 of 2026) is in force since 31 July 2026 and creates the AI Office of Ireland as statutory coordinator, single point of contact and keeper of a nation…
- A full penalties regime applies: fines at AI Act ceilings (EUR 35m/7%, 15m/3%, 7.5m/1%, EUR 1m for public bodies), decided by an independent adjudicator with High Court confirmation or appeal…
- The Act does not itself make the AI Office a market surveillance authority; the government indicated a statutory instrument to designate it, and commencement excluded parts of the MSA…
- Matheson reports that a second bill in autumn 2026 is expected to implement the Digital Omnibus changes; sandboxes are authorised but not yet launched.

SANDBOX PLANNED

The 2026 Act empowers the AI Office to establish one or more national AI regulatory sandboxes (with Data Protection Commission supervision where personal data is involved) and allows real-world testing…

MARKET SURVEILLANCE AUTHORITIES 2

15 national competent authorities designated under S.I. No. 366 of…
Central Bank of Ireland; Coimisiún na Meán; Commission for Communications Regulation; Commission for Railway Regulation; Commission for Regulation o…

AI Office of Ireland (Oifig IS na hÉireann)
Central coordinating authority and single point of contact; coordinates joint investigations; maintains the national AI register; may run sandboxes. The Act…

NOTIFYING AUTHORITY

Sectoral notifying authorities designated by S.I. No. 366 of 2025 (European Union (Artificial Intelligence) (Designation) Regulations 2025)…

IMPLEMENTING LAW ENACTED

Regulation of Artificial Intelligence Act 2026 (No. 31 of 2026), commenced by S.I. No. 403 of 2026; preceded by S.I. No. 366 of 202…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

SEP 2026

Commission lists the AI Office of Ireland as single point of contact

The Commission's market surveillance authorities page (updated 7 September 2026) lists the AI Office of Ireland as Ireland's single point of…

digital-strategy.ec.europa.eu

JUL 2026

President signs the Act; AI Office of Ireland established

President Connolly signed the Act on 21 July 2026; S.I. 403/2026 commenced it on 31 July 2026 (excluding paragraphs (a) and (e) of the 'applicab…

enterprise.gov.ie

JUL 2026

Digital Omnibus on AI changes the timetable

Regulation (EU) 2026/1744 entered into force on 27 July 2026, deferring Annex III high-risk rules to 2 December 2027 and Annex I to 2 August 2028.…

matheson.com

ANALYSIS OPENING; FULL TEXT ONLINE

Ireland is among the most complete implementations in the EU. It split the job into two steps: statutory instruments in July and September 2025 that designated existing regulators as competent authorities (meeting the Article 70 deadline in substance), and a primary Act in 2026 that supplied what secondary legislation could not: a statutory AI Office, investigatory and enforcement powers for the market surveillance authorities, an adjudication and court-confirmation route for fines, and sandbox and real-world-testing provisions. The Bill was published on 17 June 2026, the Act was signed on …

SOURCES 10

15 national competent authorities…	enterprise.gov.ie ↗
AI Office of Ireland (Oifig IS na hÉireann)	williamfry.com ↗
Notifying authority: Sectoral notifying…	enterprise.gov.ie ↗
Regulation of Artificial Intelligence A…	data.oireachtas.ie ↗
Regulatory sandbox	legal500.com ↗
National AI Strategy Refresh 2024 ('A…	enterprise.gov.ie ↗
Commission lists the A…	digital-strategy.ec.europa.eu ↗
President signs the Act; AI Office of…	enterprise.gov.ie ↗

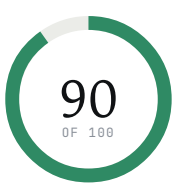
+ 2 more sources on the web page

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/ireland/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE IT · RANK 1 OF 27 BY READINESS

Italy





Italy has one of the EU's most complete frameworks: Law 132/2025 (in force 10 October 2025) made ACN the market surveillance authority and single point of contact and AgID the notifying authority, and two implementing decrees (D.Lgs. 160/2026 on policing, biometrics and liability; D.Lgs. 179/2026 on authorities, penalties, sandbox, labour and training, in force 23 October 2026) completed the delegation on time.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Oct 2025	**Adopted**	**Planned**	**2024** Strategia Italiana per l'Intelligenza…	Agenzia per la cybersicurezza nazionale (ACN), listed by the European Commission

KEY FINDINGS 5

- Italy was the first member state with a national AI law (Law 132/2025, in force 10 October 2025) and completed its implementing decrees within the twelve-month delegation (D.Lgs. 160/2026 and 179/2026).
- ACN is market surveillance authority, single point of contact and general penalty authority; AgID is notifying authority; Banca d'Italia, CONSOB, IVASS and the Garante keep sector and fundamental-…
- National Article 99 penalties are set in D.Lgs. 179/2026 (Art. 23) at the AI Act ceilings (EUR 35m/7%, 15m/3%, 7.5m/1%, 1m/0.5%) and are imposed by AgID and the market surveillance authorities; they appl…
- The Italian AI sandbox is created in law (Art. 26 D.Lgs. 179/2026) but is not yet operational pending management rules.
- Italy layers national rules on top of the AI Act: judicial authorisation for real-time biometrics, a ban on scraped biometric databases, civil-liability presumptions, a new criminal offence (Art. 437-bis), human-…

SANDBOX PLANNED

Article 26 of D.Lgs. 179/2026 establishes the 'Spazio di sperimentazione italiano per l'IA' under the direct supervision of the national AI authorities; the decree takes effect on 23 October 2026 and operational rules and…

MARKET SURVEILLANCE AUTHORITIES 3

Agenzia per la cybersicurezza nazionale (ACN)
National market surveillance authority, single point of contact with the Commission and other member states, general penalty authority, inspection…

Banca d'Italia, CONSOB and IVASS
Supervisory authorities for high-risk AI systems in banking/credit, financial markets and insurance respectively (Art. 74(6) AI Act), with their own supervis…

Garante per la protezione dei dati personali
Supervision within the limits of Article 74(8) of the AI Act: high-risk systems affecting fundamental rights (biometrics, law enforcement, migration and bord…

NOTIFYING AUTHORITY

Agenzia per l'Italia Digitale (AgID)

IMPLEMENTING LAW ENACTED

Legge 23 settembre 2025, n. 132, Disposizioni e deleghe al Governo in materia di intelligenza artificiale; implemented by D.Lgs. 9…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

OCT 2026
D.Lgs. 179/2026 on authorities, penalties and sandbox published
Legislative Decree no. 179 of 7 October 2026 (Gazzetta Ufficiale Serie Generale no. 234 of 8 October 2026, in force 23 October 2026) details…
noze.it

SEP 2026
D.Lgs. 160/2026 on policing, biometrics and liability published
Legislative Decree no. 160 of 9 September 2026 (Gazzetta Ufficiale no. 214 of 15 September 2026, in force 30 September 2026) allows police real-…
ntplusdiritto.ilsole24ore.com

JUL 2026
Digital Omnibus on AI defers high-risk deadlines
Regulation (EU) 2026/1744 (in force 27 July 2026) moved Annex III high-risk obligations to 2 December 2027 and Annex I to 2 August 2028, s…
actuia.com

ANALYSIS OPENING; FULL TEXT ONLINE

Italy chose to legislate early and broadly. Law 132/2025 did more than designate authorities: it set principles for AI in healthcare, labour, the professions and public administration, and delegated the government to fill in the AI Act machinery within a year. The two decrees adopted in September and October 2026 discharged that delegation on time, which puts Italy among the few member states with a complete, in-force national rulebook before the Digital Omnibus-deferred high-risk phase begins.

SOURCES 8

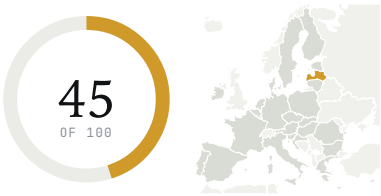
Agenzia per la cybersicurezza nazionale (ACN)	noze.it ↗
Garante per la protezione d…	studiolegalestefanelli.it ↗
Notifying authority: Agenzia per…	gazzettaufficiale.it ↗
Strategia Italiana per l'Intelligenza Artificiale…	agid.gov.it ↗
D.Lgs. 160/2026 on…	ntplusdiritto.ilsole24ore.com ↗
Digital Omnibus on AI defers high-risk…	actuia.com ↗
Council of Ministers approves two…	mysolution.it ↗
Law 132/2025 published, first nation…	lavoripubblici.it ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/italy/**

Verified 22 Oct 2026

PARTIALLY IN PLACE LV · RANK 15 OF 27 BY READINESS

Latvia



Latvia's Cabinet decided its AI Act implementation plan on 25 February 2025 (naming PTAC as single point of contact, the Data State Inspectorate, the Bank of Latvia and sectoral bodies as authorities) and has two flanking laws (the AI Centre Law and a financial-sector DORA/AI Act law with sanctions), but as of October 2026 no general implementing or penalties law for sectors outside finance has been adopted.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
No bill yet Oct 2025	**Not adopted**	**Planned**	**None** identified	Consumer Rights Protection Centre (PTAC), designated in the Cabinet's 25 February 2025 decision and listed by the European Commission (page updated 7 Septemb…

KEY FINDINGS 5

- Latvia's general AI Act implementing and penalties law for non-financial sectors has not been adopted as of October 2026; the designations rest on the Cabinet's February 2025 decision and still…
- Only the financial sector has an enacted regime: the Bank of Latvia supervises AI at financial market participants, with fining powers, since 1 October 2025.
- The model is highly decentralised (more than ten sectoral authorities coordinated by VARAM, Data State Inspectorate for prohibited and certain high-risk systems, Ministry of Economics as notifying…
- PTAC is the designated single point of contact under the Cabinet's February 2025 decision and is listed as such by the European Commission, although the Cabinet report notes PTAC can supervis…
- The AI Centre Law (March 2025) gives Latvia a coordination body and a sandbox basis in principle, but no Article 57 sandbox is operational.

SANDBOX PLANNED

The Mākslīgā intelekta centra likums (AI Centre Law, adopted 6 March 2025, in force 20 March 2025) creates a national AI Centre as coordinating body and provides for a national regulatory sandbox and…

MARKET SURVEILLANCE AUTHORITIES 3

Datu valsts inspekcija (Data State Inspectorate)
Market surveillance authority for prohibited AI practices and for high-risk systems in Annex III points 1, 6, 7 and 8 (law enforcement, border manageme…

Latvijas Banka (Bank of Latvia)
Market surveillance of AI systems placed on the market, put into service or used by financial market participants under its supervision, as called for in the…

Patērētāju tiesību aizsardzības centrs (PTAC, Consumer Rights…
Decentralised sectoral market surveillance under the Cabinet's February 2025 decision, with VARAM as national coordinator; PTAC is designated single poin…

NOTIFYING AUTHORITY

Ekonomikas ministrija (Ministry of Economics), set in the Cabinet's February 2025 decision; the enabling amendments for sectors outside…

IMPLEMENTING LAW NO BILL YET

Finanšu tirgus digitālās darbības noturības un mākslīgā intelekta izmantošanas likums (financial-sector DORA/AI Act law, in force 1…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

JUL 2026
Digital Omnibus on AI relieves immediate pressure
Regulation (EU) 2026/1744 (in force 27 July 2026) deferred Annex III high-risk obligations to 2 December 2027 and the national sandbox deadli…
actuia.com

MAY 2026
Industry drafts a national AI strategy proposal
The Public-Private Partnership Association of Latvia opened a working document for a national AI strategy (28 May 2026, approval target 5…
pppa.lv

OCT 2025
Financial-sector AI Act law with sanctions enters into force
Adopted by the Saeima on 11 September 2025 and in force 1 October 2025, the law applies DORA and the AI Act to Bank of Latvia-supervis…
praxikon.com

ANALYSIS OPENING; FULL TEXT ONLINE

Latvia planned carefully and then stalled. The Cabinet's February 2025 decision mapped a decentralised model that reuses existing regulators, with the Data State Inspectorate taking prohibited and certain high-risk systems and the Bank of Latvia taking finance, and set 2 August 2025 for the enabling amendments. Only the financial strand made it: the DORA/AI Act law for Bank of Latvia-supervised firms has been in force since 1 October 2025. For every other sector the enabling amendments to product-safety, consumer-protection and sectoral laws that would confer AI Act powers and penalties…

SOURCES 4

- Datu valsts inspekcija (Data State… praxikon.com ↗
- Latvijas Banka (Bank of Latvia) tapportals.mk.gov.lv ↗
- Digital Omnibus on AI relieves immediate… actuia.com ↗
- Industry drafts a national AI strategy proposal pppa.lv ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/latvia/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE LT · RANK 11 OF 27 BY READINESS

Lithuania



Lithuania designated its authorities early via amendments to the Law on Information Society Services adopted on 14 January 2025 (in force 1 April 2025): the Communications Regulatory Authority (RRT) is market surveillance authority and single point of contact and the Innovation Agency is notifying authority and runs an EU-funded AI regulatory sandbox that opened for applicants in early 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Jan 2025	**Not adopted**	**Operational**	**2019** Lithuanian Artificial Intelligence Strategy:…	Communications Regulatory Authority (RRT), listed by the European Commission

KEY FINDINGS 5

- Lithuania designated its authorities more than six months before the 2 August 2025 deadline, via Law XV-106 amending the Law on Information Society Services (in force 1 April 2025).
- RRT (telecoms regulator) is market surveillance authority and single point of contact; the Innovation Agency is notifying authority and sandbox operator; policy sits with the Ministry of the Economy and…
- An EU-funded EUR 3m regulatory sandbox opened for its first three-year cohort in early 2026, well ahead of the (now deferred) August 2027 EU deadline.
- The 2025 amendments let the RRT order corrective measures and impose administrative fines; a general implementation bill approved by the government in May 2026, setting out the responsibilities of…
- The 2025 amendments give the RRT the lead and leave the data protection and consumer protection authorities their existing roles where relevant to AI.

SANDBOX OPERATIONAL

EU-funded AI regulatory sandbox operated by the Innovation Agency (EUR 3m from 2021-2027 EU cohesion funds, EUR 1.5m each for the Capital Region and for Central and Western Lithuania), offering AI Act…

MARKET SURVEILLANCE AUTHORITIES 2

Lietuvos Respublikos ryšių reguliavimo tarnyba (RRT, Communicatio…
National market surveillance authority and single point of contact; conducts inspections, orders corrective measures (withdrawal, suspension, modificatio…

Valstybinė duomenų apsaugos inspekcija (State Data Protection…
Keep their data-protection and consumer-protection roles where relevant to AI systems and coordinate with the RRT; the amendments update their functions…

NOTIFYING AUTHORITY

Inovacijų agentūra (Innovation Agency)

IMPLEMENTING LAW ENACTED

Law No. XV-106 amending the Law on Information Society Services (No. X-614) to implement Regulation (EU) 2024/1689, with Law No.…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

SEP 2026

Commission list confirms RRT as single point of contact

The Commission's market surveillance authorities page (updated 7 September 2026) lists the RRT for Lithuania without the 'pending' marker used for…
digital-strategy.ec.europa.eu

JUL 2026

Digital Omnibus on AI defers high-risk and sandbox deadlines

Regulation (EU) 2026/1744 (in force 27 July 2026) moved Annex III high-risk obligations to 2 December 2027 and the member-state sandbox…
regulation-ai.eu

MAY 2026

Government approves a general AI Act implementation bill

The government approved a draft law on the implementation of the EU AI Act prepared by the Ministry of the Economy and Innovation, setting…
eimin.lrv.lt

ANALYSIS OPENING; FULL TEXT ONLINE

Lithuania is a small-state example of implementing by amendment rather than by a new AI statute. The January 2025 changes to the Law on Information Society Services inserted the AI Act designations into an existing framework: the RRT, already the Digital Services Act coordinator and telecoms regulator, became market surveillance authority and single point of contact, and the Innovation Agency, the state's innovation promotion body, became notifying authority. The Commission's authority list shows the RRT without the 'pending' marker.

SOURCES 8

Lietuvos Respublikos ryšių reguliavimo…	regulations.ai ↗
Valstybinė duomenų apsaugos inspekcij…	regulations.ai ↗
Regulatory sandbox	lithuania.lt ↗
Lithuanian Artificial…	digital-skills-jobs.europa.eu ↗
Commission list…	digital-strategy.ec.europa.eu ↗
Digital Omnibus on AI defers high-risk…	regulation-ai.eu ↗
Government approves a general AI Act…	eimin.lrv.lt ↗
Sandbox opens registration for first cohort	walless.com ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/lithuania/**

Verified 22 Oct 2026

LAGGING LU · RANK 18 OF 27 BY READINESS

Luxembourg



Luxembourg's AI Act implementing bill (projet de loi 8476, filed 23 December 2024) that would make the CNPD the general market surveillance authority and single point of contact remains a draft after a Council of State opinion on 10 July 2026 raising formal objections; no authority, penalty regime or sandbox is legally in place as of October 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill Dec 2024	**Not adopted**	**Planned**	**2025** Luxembourg's Artificial Intelligence Strategy…	CNPD (proposed; marked 'pending' on the European Commission's list as of 7 September 2026)

KEY FINDINGS 5

- No Luxembourg authority is legally designated under the AI Act as of October 2026; bill 8476 has been pending since 23 December 2024 and remains a draft after the Council of State's opinion of 10 July…
- The proposed model centres on the CNPD as default market surveillance authority, coordinator, single point of contact and sandbox operator, with CSSF, CAA, ILNAS, ILR, ALIA and the judici…
- The bill's Article 16 penalty regime mirrors Article 99 ceilings (EUR 35m/7%, 15m/3%, 7.5m/1%) and drew no objection from the Council of State, but is not in force.
- The Council of State raised formal oppositions on the allocation of notifying-authority competences (Article 2), the CSSF's scope, regulatory powers for non-public-establishment authorities and the…
- Luxembourg has a 2025 national AI strategy and major compute investments (MeluXina-AI, AI Factory) but no regulatory sandbox, because the enabling law is not adopted.

SANDBOX PLANNED

Article 12 of bill 8476 would allow national authorities to set up AI regulatory sandboxes and oblige the CNPD to run at least one; the Council of State's 10 July 2026 opinion notes the 2 August 2026 Article…

MARKET SURVEILLANCE AUTHORITIES 3

Commission nationale pour la protection des données (CNPD)
Proposed general (default) market surveillance authority, coordinator of the other authorities, single point of contact and operator of the mandatory nation…

Commission de surveillance du secteur financier (CSSF) and…
Proposed market surveillance for AI systems directly linked to the financial and insurance services of their supervised entities (Art. 74(6)); the Council of State…

ILNAS, Institut luxembourgeois de régulation (ILR), ALIA, Autorité de…
Proposed sectoral market surveillance: ILNAS for certain Annex I product categories and critical infrastructure, ILR for essential/important entities'…

NOTIFYING AUTHORITY

Proposed in Article 2 of bill 8476: ILNAS (Institut luxembourgeois de la normalisation, de l'accréditation, de la sécurité et qualité des produits e…

IMPLEMENTING LAW DRAFT BILL

Projet de loi n° 8476 portant mise en œuvre de certaines dispositions du règlement (UE) 2024/1689 (règlement sur l'intelligence artificiell…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

OCT 2026

Bill 8476 still a draft as the new CNPD leadership prepares to take office

Paperjam reported in October 2026 that bill 8476 remains a draft bill whose framework has not been finalised, with Fedil having submitted an opinion…

en.paperjam.lu

SEP 2026

Commission list still shows CNPD as pending; new CNPD commissioners…

The Commission's market surveillance authorities page (updated 7 September 2026) lists the CNPD for Luxembourg with the designation marked…

gouvernement.lu

JUL 2026

Council of State issues opinion with formal objections

On 10 July 2026 the Conseil d'État opined on the bill. It formally opposed Article 2 for not allocating notifying-authority competences between ILNAS…

wdocs-pub.chd.lu

ANALYSIS OPENING; FULL TEXT ONLINE

Luxembourg drafted early and legislated slowly. The government filed bill 8476 in December 2024, before most member states had a text, and its design is clean: the data protection authority (CNPD) becomes the default AI market surveillance authority, coordinator and European contact point, while the financial, insurance, product, telecoms, media and judicial regulators keep AI systems in their domains. The Council of State's opinion of 10 July 2026 asks for further work, and twenty-two months after filing the bill remains a draft.

SOURCES 7

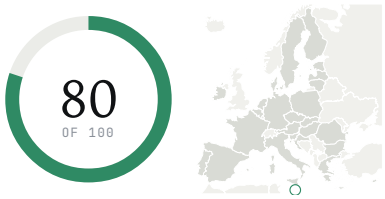
Commission nationale pour la protection des…	chd.lu ↗
Commission de surveillance du secte…	wdocs-pub.chd.lu ↗
ILNAS, Institut luxembourgeois de régulatio…	paperjam.lu ↗
Luxembourg's Artificial Intelligence…	gouvernement.lu ↗
Bill 8476 still a draft as the new CNPD…	en.paperjam.lu ↗
Commission list still shows CNPD as…	gouvernement.lu ↗
Bill 8476 filed with the Chamber of Deputies	arendt.com ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/luxembourg/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE MT · RANK 7 OF 27 BY READINESS

Malta



Malta enacted its national AI Act framework in October 2025 via two legal notices that make the MDIA the lead market surveillance authority, notifying authority and single point of contact, with the IDPC covering rights-sensitive high-risk systems. The national regulatory sandbox has a legal basis but no announced launch.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Oct 2025	**Adopted**	**Planned**	**2019** Malta: The Ultimate AI Launchpad - A Strategy…	Malta Digital Innovation Authority (MDIA)

KEY FINDINGS 5

- Malta met the Article 70 designation deadline in substance: a two-authority model (MDIA lead, IDPC for rights-sensitive systems) was fixed in secondary legislation in October 2025.
- The MDIA holds every central role at once - market surveillance, notifying authority, single point of contact and sandbox operator - a highly centralised set-up.
- National penalty provisions and daily fines exist in L.N. 226, alongside the AI Act's Article 99 penalty regime, which has applied since August 2025.
- The regulatory sandbox exists on paper only; no call for participants had been announced by October 2026, though Malta now has until August 2027 under the Omnibus.
- The 2019 national AI strategy (vision to 2030) is being realigned, according to the OECD.AI database; no replacement strategy has been published.

SANDBOX PLANNED

L.N. 226 of 2025 designates the MDIA as the sole national competent authority responsible for establishing and running a national AI regulatory sandbox. As of October 2026 the MDIA had not announced a call for…

MARKET SURVEILLANCE AUTHORITIES 2

Malta Digital Innovation Authority (MDIA)
Lead/default market surveillance authority for most AI systems; also notifying authority, single point of contact and designated operator of the national AI…

Information and Data Protection Commissioner (IDPC)
Market surveillance authority for Annex III high-risk systems in biometrics, emergency calls, law enforcement, border management and justice/democrac…

NOTIFYING AUTHORITY

Malta Digital Innovation Authority (MDIA)

IMPLEMENTING LAW ENACTED

Artificial Intelligence Regulations, 2025 (L.N. 226 of 2025) and Artificial Intelligence (Designation of the Information and Data…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

AUG 2026

National provisions commence on 2 August 2026

Regulations 4 to 6 and 8 to 10 of L.N. 226 and regulations 5 to 7 and 9 to 12 of L.N. 227 come into force on 2 August 2026, the date from which…
legislation.mt

JUL 2026

IDPC flags revised EU timelines after Digital Omnibus approval

The IDPC publicly noted that the AI regulatory sandbox deadline moved to 2 August 2027 and that transparency duties still applied from 2 Aug…
idpc.org.mt

JUL 2026

Malta classed as an AI Act 'frontrunner' in Deloitte Legal benchmarking

A July 2026 Deloitte Legal comparison (as reported by Edupedu) grouped Malta with Cyprus, Finland, Hungary, Ireland, Italy and Slovenia as…
edupedu.ro

ANALYSIS OPENING; FULL TEXT ONLINE

Malta chose the fastest route available to a small member state: rather than a parliamentary act, it used two legal notices, under the Malta Digital Innovation Authority Act and the Data Protection Act, published on 10 October 2025. L.N. 226 of 2025 gives the MDIA the default market surveillance role, the notifying authority role, the single point of contact function and the mandate to build the national regulatory sandbox, while L.N. 227 of 2025 carves out the rights-sensitive Annex III categories (biometrics, law enforcement, migration, justice) for the Information and…

SOURCES 5

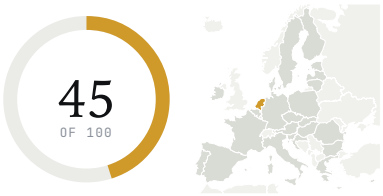
Malta Digital Innovation Authority (MDIA)	legislation.mt ↗
Information and Data Protection…	legislation.mt ↗
Malta: The Ultimate AI Launchpad - A Strategy a…	oecd.ai ↗
IDPC flags revised EU timelines after Digital…	idpc.org.mt ↗
Malta classed as an AI Act 'frontrunner' in…	edupedu.ro ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/malta/**

Verified 22 Oct 2026

PARTIALLY IN PLACE NL · RANK 16 OF 27 BY READINESS

Netherlands



The Netherlands has a settled supervisory design (ten sectoral market surveillance authorities coordinated by the AP and RDI) but its implementing act is still a draft: consulted April-June 2026 and, according to aicompliancehub.nl, due in the Tweede Kamer in Q2 2027, so no national penalty regime or sandbox is legally in force.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
In consultation Apr 2026	**Not adopted**	**Planned**	**2026** Internationale strategie voor een…	Rijksinspectie Digitale Infrastructuur (RDI), designated in Article 2.3(2) of the draft Uitvoeringswet AI-verordening (proposed, not yet in force)

KEY FINDINGS 5

- The Netherlands missed the 2 August 2025 designation deadline in legal terms: authorities are named in a draft act, not in force.
- The model is deliberately decentralised - ten existing sectoral regulators - with the AP and RDI as joint coordinators and the RDI as single point of contact.
- No national penalty regime exists yet; the AP and sector regulators can rely only on existing powers (notably GDPR) until the UAIV is enacted.
- The sandbox design (RDI/AP, one multi-sectoral sandbox) is mature, but it cannot operate on a statutory basis before the act passes.
- According to aicompliancehub.nl, submission to parliament is planned for Q2 2027, and the entry-into-force date is not yet known.

SANDBOX PLANNED

The draft act contains implementing provisions for one multi-sectoral AI regulatory sandbox and for real-world testing, to be operated jointly by the market surveillance authorities and coordinated by the RDI and AP,…

MARKET SURVEILLANCE AUTHORITIES 3

Autoriteit Persoonsgegevens (AP)
Co-coordinator of AI supervision; supervisor for prohibited practices, transparency obligations and high-risk systems in domains without a clear…

Rijksinspectie Digitale Infrastructuur (RDI)
Co-coordinator of AI supervision, single point of contact under Article 2.3(2) of the draft act (Art. 70(2) AI Act), market surveillance for product-embedded AI…

Sectoral authorities: ILT, IGJ, NVWA, Nederlandse Arbeidsinspectie,…
Domain-specific market surveillance (transport, health, consumer products, labour, financial markets, banking/insurance, judiciary) under the draft act; ten…

NOTIFYING AUTHORITY

Existing notifying authorities under Annex I Section A product legislation also become notifying authorities under the AI Act, with the RDI propos…

IMPLEMENTING LAW IN CONSULTATION

Uitvoeringswet AI-verordening (UAIV)

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

AUG 2026

Reported planning: bill to the Tweede Kamer in Q2 2027

According to aicompliancehub.nl, the Digital Affairs planning letter of 31 August 2026 schedules submission of the bill to the Tweede Kamer for t…

aicompliancehub.nl

JUL 2026

Raad voor de rechtspraak advises on judicial AI supervision

On 15 July 2026 the Raad voor de rechtspraak issued its legislative advice on the draft act, addressing the proposed supervision of high-ris…

rechtspraak.nl

JUN 2026

AFM implementation assessment: feasible under conditions

The AFM's uitvoeringstoets of 11 June 2026 judged the draft act workable subject to conditions, including additional cooperation…

afm.nl

ANALYSIS OPENING; FULL TEXT ONLINE

The cabinet asked the AP's algorithm coordination directorate and the RDI for advice on AI Act supervision and largely adopted it: reuse existing sectoral regulators rather than build a new AI authority, and let the AP (for rights-sensitive and residual domains) and the RDI (for product-embedded AI and technical coordination) coordinate the system. The draft Uitvoeringswet AI-verordening published for consultation on 20 April 2026 codifies exactly that, naming ten market surveillance authorities including the AFM, DNB, IGJ, NVWA, ILT, the labour inspectorate and two internal judicial supervisors, a…

SOURCES 10

Autoriteit Persoonsgegevens (AP)	binnenlandsbestuur.nl ↗
Rijksinspectie Digitale Infrastructuur (RDI)	privacy-web.nl ↗
Sectoral authorities: ILT, IGJ,…	internetconsultatie.nl ↗
Notifying authority:…	zoek.officielebekendmakingen.nl ↗
Regulatory sandbox	aiactblog.nl ↗
Internationale strategie voor een veilig…	rijksoverheid.nl ↗
Reported planning: bill to the Twee…	aicompliancehub.nl ↗
Raad voor de rechtspraak advises on…	rechtspraak.nl ↗

+ 2 more sources on the web page

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/netherlands/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE PL · RANK 9 OF 27 BY READINESS

Poland



Poland enacted the Act of 3 July 2026 on Artificial Intelligence Systems (Dz.U. 2026 poz. 1003), in force since 11 August 2026, creating a new regulator (KRiBSI) whose chair was elected by the Sejm on 18 September 2026; inspection, proceedings and penalty chapters apply from 28 October 2026 and the regulatory sandbox is in preparation.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Jul 2026	**Adopted**	**Planned**	**None** identified	Komisja Rozwoju i Bezpieczeństwa Sztucznej Inteligencji (KRiBSI)

KEY FINDINGS 5

- Poland is one of the few member states to create a brand-new AI regulator rather than reuse an existing body; KRiBSI is both market surveillance authority and single point of contact, while the Minister…
- The Act is in force (11 August 2026) and the chair is appointed, but the enforcement chapters only apply from 28 October 2026, so sanctions were not yet usable on 22 October 2026.
- Designation came roughly a year after the 2 August 2025 deadline; the AI Act's prohibitions and GPAI rules applied in Poland for a year without a national enforcer.
- The sandbox has a statutory basis and a free-for-SME model but is still being built; Poland has until 2 August 2027 under the Omnibus.
- Poland's national AI policy is outdated (2020); a 2030 successor is still a draft.

SANDBOX PLANNED

The Act empowers KRiBSI to establish regulatory sandboxes by decision (Art. 91), free of charge for micro, small and medium enterprises and with capped fees for local government. After the Act was signed, Deputy…

MARKET SURVEILLANCE AUTHORITIES 1

Komisja Rozwoju i Bezpieczeństwa Sztucznej Inteligencji (KRiBSI) -…
New independent collegial market surveillance authority and single point of contact under Art. 70; conducts proceedings, imposes administrative fines,…

NOTIFYING AUTHORITY

Minister responsible for informatisation (Minister of Digital Affairs), designated as notifying authority by Article 86 of the Act of 3 July 2026

IMPLEMENTING LAW ENACTED

Ustawa z dnia 3 lipca 2026 r. o systemach sztucznej inteligencji (Dz.U. 2026 poz. 1003)

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

SEP 2026

Sejm elects Pamela Krzypkowska as KRiBSI chair; Senate consents

After a public hearing days earlier, the Sejm elected the former Microsoft and Ministry of Digital Affairs professional as KRiBSI chair on 18…

android.com.pl

SEP 2026

Senate consent published in Monitor Polski

Senate resolution granting consent to the appointment of the KRiBSI chair under the Act of 3 July 2026, the formal step that lets the commissi…

api.sejm.gov.pl

JUL 2026

Act signed and published; staggered entry into force

The President signed the Act in July 2026 and it was published on 27 July 2026 (Dz.U. 2026 poz. 1003). Per the official ELI record it entered into…

itwiz.pl

ANALYSIS OPENING; FULL TEXT ONLINE

After a long drafting history (a first ministry draft circulated in late 2024), Poland moved quickly in 2026: cabinet adoption on 31 March, Sejm print 2443 in April, passage over the summer, presidential signature in July and publication on 27 July 2026. The Act of 3 July 2026 on AI Systems is a comprehensive implementing law covering supervision of AI systems and GPAI models, infringement proceedings, accreditation and notification of conformity assessment bodies (with the Minister of Digital Affairs as notifying authority under Article 86), innovation support and administrativ…

SOURCES 8

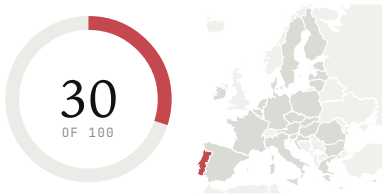
Komisja Rozwoju i Bezpieczeństwa Sztuczne…	eli.gov.pl ↗
Notifying authority: Minister responsible for…	eli.gov.pl ↗
Regulatory sandbox	xyz.pl ↗
Sejm elects Pamela Krzypkowska as…	android.com.pl ↗
Senate consent published in Monitor…	api.sejm.gov.pl ↗
Act signed and published; staggered entry into…	itwiz.pl ↗
Draft 2030 AI policy under consultation	zpp.pl ↗
Council of Ministers adopts the AI systems…	dwfgroup.com ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/poland/**

Verified 22 Oct 2026

LAGGING PT · RANK 23 OF 27 BY READINESS

Portugal



Portugal announced ANACOM as its AI Act market surveillance authority and single point of contact in September 2025 but, as of October 2026, has not published the national legal instrument that formally designates authorities and sets penalties; ANACOM has nonetheless begun issuing guidance and the January 2026 National AI Agenda schedules sandboxes.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
No bill yet	Not adopted	Planned	2026 Agenda Nacional de Inteligência Artificia…	ANACOM (announced September 2025; formal designation pending)

KEY FINDINGS 5

- ANACOM is the de facto AI Act lead, but its designation rests on a ministerial announcement, not a published legal act; the Article 70 formal designation is still outstanding.
- No national penalty regime under Article 99 exists; ANACOM cannot fine for AI Act breaches until the diploma is adopted.
- Portugal did meet the Article 77 obligation, publishing a list of 14 fundamental-rights authorities.
- The January 2026 National AI Agenda commits to an AI Act-aligned framework and regulatory sandboxes; neither had materialised by October 2026.
- ANACOM is compensating with soft-law output (AI literacy guidelines, Article 5 recommendations) while awaiting hard powers.

SANDBOX PLANNED

The National AI Agenda action plan (RCM 2/2026) lists the definition of regulatory sandboxes among its initiatives. No AI Act sandbox was operational as of October 2026; the EU deadline is now 2 August 2027.

MARKET SURVEILLANCE AUTHORITIES 2

ANACOM - Autoridade Nacional de Comunicações
Announced (19 September 2025) as market surveillance authority and single point of contact, coordinating other sectoral authorities; formal designation…

Sectoral authorities expected to coordinate with ANACOM (Banco de…
According to law firm Andersen, they keep competence in their sectors (banking, insurance, securities) and coordinate with ANACOM; roles not yet…

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW NO BILL YET

National diploma designating AI Act competent authorities and setting penalties (initiative IV.4 of the National AI Agenda action pla…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

JUN 2026

ANACOM consults on Article 5 prohibited-practice recommendations

In June 2026 ANACOM opened a public consultation on draft recommendations for implementing the Article 5 prohibitions, designe…
apdc.pt

MAY 2026

ANACOM consults on organisational AI literacy guidelines

In May 2026 ANACOM put draft organisational guidelines for implementing the Article 4 AI literacy duty into public consultation, with written…
anapimentaadvogados.pt

APR 2026

DSA implementing law enacted - but not the AI Act one

Lei n.º 12-A/2026 of 15 April 2026 gave ANACOM its Digital Services Act powers through a parliamentary law, showing the legislative route…
files.diariodarepublica.pt

ANALYSIS OPENING; FULL TEXT ONLINE

Portugal's AI Act implementation has been a story of announcements outrunning legislation. After missing the 2 August 2025 deadline, the government used ANACOM's own conference on 19 September 2025 to name the telecoms regulator as market surveillance authority and single point of contact, mirroring the choice made a month earlier for the Digital Services Act. Sectoral authorities - the CNPD, Banco de Portugal, ASF and CMVM - are expected to keep competence in their fields and coordinate with ANACOM, but the division of labour, the notifying authority and the penal…

SOURCES 8

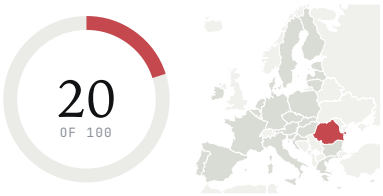
ANACOM - Autoridade Nacional de…	eco.sapo.pt ↗
Sectoral authorities expected to…	pt.andersen.com ↗
National diploma designating AI Act…	bo.digital.gov.pt ↗
Regulatory sandbox	cms.law ↗
ANACOM consults on Article 5 prohibited-practi…	apdc.pt ↗
ANACOM consults on…	anapimentaadvogados.pt ↗
DSA implementing law…	files.diariodarepublica.pt ↗
Portugal misses the 2 August 2025…	eco.sapo.pt ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/portugal/**

Verified 22 Oct 2026

LAGGING RO · RANK 26 OF 27 BY READINESS

Romania



Romania has only a March 2026 government memorandum proposing ANCOM as market surveillance authority and single point of contact; no implementing law has been adopted, and ANCOM itself states that no Romanian authority can verify or sanction AI Act breaches until that law enters into force.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
No bill yet	Not adopted	None	2024 Strategia Națională în domeniul Inteligenței…	ANCOM (proposed; not legally designated)

KEY FINDINGS 5

- Romania has no implementing law, no draft bill in public consultation, and no legally designated Article 70 authorities as of October 2026.
- The only instrument is a non-binding government memorandum (12 March 2026) proposing ANCOM as lead authority and single point of contact and ADR as notifying authority.
- ANCOM openly acknowledges that no Romanian authority can sanction AI Act breaches until national legislation is in force.
- No regulatory sandbox or sandbox legal basis exists.
- The 2024-2027 national AI strategy predates the AI Act's application and does not address enforcement architecture.

SANDBOX NONE

Romania has no AI regulatory sandbox and no sandbox legal basis; the subject is absent from ANCOM's July 2026 status release. The EU deadline is 2 August 2027.

MARKET SURVEILLANCE AUTHORITIES 3

ANCOM - Autoritatea Națională pentru Administrare și Reglementare…
Proposed (government memorandum, March 2026) as residual/general market surveillance authority and single point of contact; also for EMC and radio-…

ASF (Financial Supervisory Authority) and BNR (National Bank of…
Proposed market surveillance authorities for high-risk AI in financial services

ANSPDCP (National Supervisory Authority for Personal Data…
Proposed market surveillance authority for high-risk systems in biometrics, law enforcement, border/migration/asylum and justice; ANPC and the Labour…

NOTIFYING AUTHORITY

Autoritatea pentru Digitalizarea României (ADR) - proposed as notifying authority in the government memorandum of 12 March 2026; not yet…

IMPLEMENTING LAW NO BILL YET

National law implementing Regulation (EU) 2024/1689 (under drafting by the designated authorities; no bill published)

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

AUG 2026

Romania grouped among 'late - partial implementers'

Deloitte Legal's July 2026 benchmarking, reported by Edupedu on 11 August 2026, placed Romania with Austria, Belgium, Bulgaria, Croatia, Estonia…

edupedu.ro

AUG 2026

Press describes an AI Act 'without teeth'

Bursa wrote on 4 August 2026 that Romania's AI Act supervisory structure exists 'more on paper' until the national law is adopted and that,…

bursa.ro

JUL 2026

ANCOM: no sanctions possible before national law

In a 24 July 2026 press release ANCOM confirmed that the authorities are still drafting the national legislative framework (authorities, duties,…

ancom.ro

ANALYSIS OPENING; FULL TEXT ONLINE

Romania is among the furthest behind. Fourteen months after the Article 70 deadline, its AI Act governance consists of a government memorandum adopted on 12 March 2026 that proposes - but cannot legally establish - ANCOM as general market surveillance authority and single point of contact, with the financial regulators (ASF, BNR) and the data protection authority (ANSPDCP) taking the financial and rights-sensitive high-risk categories, the consumer and labour inspectorates acting in their fields, and ADR, the digitalisation agency, as notifying authority.

SOURCES 6

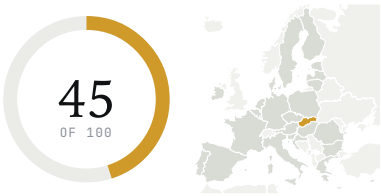
ANCOM - Autoritatea Națională pentru…	ancom.ro ↗
Notifying authority: Autoritatea pentru…	digi24.ro ↗
Strategia Națională în domeniul…	euroavocatura.ro ↗
Romania grouped among 'late - partial…	edupedu.ro ↗
Press describes an AI Act 'without teeth'	bursa.ro ↗
National AI Strategy 2024-2027 adopted	economedia.ro ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/romania/**

Verified 22 Oct 2026

PARTIALLY IN PLACE SK · RANK 17 OF 27 BY READINESS

Slovakia



Slovakia's government approved a combined AI Act / Data Governance Act / Data Act implementing bill on 26 August 2026 (parliamentary print 1447) naming MIRRI as general market surveillance authority, single point of contact and sandbox operator; it is in first reading with a proposed effective date of 1 January 2027, so no authority or penalty regime is yet in force.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill Aug 2026	**Not adopted**	**Planned**	**None** identified	MIRRI (proposed; bill not yet adopted)

KEY FINDINGS 5

- Slovakia has a complete, government-approved implementing bill in parliament but nothing in force; authorities, penalties and the sandbox all depend on adoption before the proposed 1 January 20…
- The model bundles three EU acts (AI Act, DGA, Data Act) in one law and avoids a new agency - MIRRI, a ministry, becomes the AI regulator and single point of contact.
- The notifying authority is the standards office (ÚNMS SR); sectoral surveillance goes to the data protection office, the Ministry of Justice, the inspection service and the National Security Authority.
- AI fines follow Article 99 tiers directly; the bill's own EUR 10 million / 4% ceiling applies to data-regulation breaches, with a one-time 'cure period' exemption.
- Slovakia has no adopted national AI strategy: the government plenipotentiary for AI said on 18 June 2026 that a draft would go to interministerial comment shortly.

SANDBOX PLANNED

The bill tasks MIRRI with establishing and operating a national AI regulatory sandbox with priority access for micro, small and medium enterprises and an advisory function; it cannot start before the law take…

MARKET SURVEILLANCE AUTHORITIES 2

Ministerstvo investícií, regionálneho rozvoja a informatizácie SR…
Proposed general market surveillance authority for AI, single point of contact, data coordinator and operator of the national AI regulatory sandbox (bill §6)

Sectoral authorities: Úrad na ochranu osobných údajov (data…
Proposed sectoral market surveillance authorities for specific high-risk domains (bill §7)

NOTIFYING AUTHORITY

Úrad pre normalizáciu, metrológiu a skúšobníctvo SR (Slovak Office of Standards, Metrology and Testing) - proposed in the bill

IMPLEMENTING LAW DRAFT BILL

Zákon o štátnej správe v oblasti umelej inteligencie a európskej dátovej regulácie (government bill, parliamentary print 1447;…

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

SEP 2026

Bill delivered to the National Council as print 1447

Delivered to the NR SR on 28 August 2026 and in first reading; the lead Committee on Public Administration and Regional Development has u…

aiprioritymap.com

AUG 2026

Government approves the AI and data governance bill

On 26 August 2026 the government approved the bill on state administration in AI and European data regulation. MIRRI leads; the previously mooted…

teraz.sk

AUG 2026

Legal commentators flag enforcement gap at 2 August 2026

Slovak legal press noted that Article 50 transparency duties applied from 2 August 2026 while Slovakia still had no law designating…

pravnenoviny.sk

ANALYSIS OPENING; FULL TEXT ONLINE

Slovakia's path has been slower than its first draft implied. MIRRI circulated an AI governance bill in August 2025 intended to apply from 1 January 2026, but the text was reworked into a single 'law on state administration in the field of AI and European data regulation' that also implements the Data Governance Act and the Data Act. The government approved that version on 26 August 2026 and it reached the National Council as print 1447 two days later. Its structure is ministry-centred: MIRRI is general market surveillance authority, single point of contact, data coordinator and sandbox operator,…

SOURCES 8

Ministerstvo investícií, regionálneho rozvoja a…	info.sk ↗
Sectoral authorities: Úrad na ochran…	aiprioritymap.com ↗
Zákon o štátnej správe v oblasti umelej…	slov-lex.sk ↗
Government approves the AI and data…	teraz.sk ↗
Legal commentators flag enforcement…	pravnenoviny.sk ↗
National AI strategy still in preparation	mirri.gov.sk ↗
Act No. 318/2025 Coll. amends…	static.slov-lex.sk ↗
First draft enters interministerial comment	pravnenoviny.sk ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/slovakia/**

Verified 22 Oct 2026

FRAMEWORK IN PLACE SI · RANK 6 OF 27 BY READINESS

Slovenia



Slovenia was among the first member states to enact a full AI Act implementing law (ZIUDHPUI, in force 21 November 2025), designating AKOS as single point of contact and sandbox coordinator alongside sectoral market surveillance authorities; a national AI strategy to 2030 followed in March 2026 and the first sandbox call closed in September 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Enacted Nov 2025	**Adopted**	**Planned**	**2026** Nacionalna strategija za umetno inteligenco…	AKOS - Agencija za komunikacijska omrežja in storitve RS

KEY FINDINGS 5

- Slovenia enacted a complete implementing act before most larger member states even published drafts; it has been in force since 21 November 2025.
- AKOS, the telecoms regulator, is the hub: single point of contact, sandbox coordinator, helpdesk and critical-infrastructure AI register, with the Information Commissioner and financial regulators as co-…
- The act contains its own offences and fines chapter, so a national penalty regime is in place.
- Governance extras - a National Council for Ethics in AI and mandatory public disclosure of public-sector AI - go beyond the minimum.
- The sandbox is the remaining gap: the area-selection call closed on 30 September 2026 and the provider call is still to come, within the Omnibus deadline of 2 August 2027.

SANDBOX PLANNED

ZIUDHPUI makes AKOS the authority for establishing AI regulatory sandboxes with a single entry point. On 12 June 2026 AKOS opened a public call (case 38292-2/2026) for proposals on the subject area of…

MARKET SURVEILLANCE AUTHORITIES 3

AKOS - Agencija za komunikacijska omrežja in storitve RS
Market surveillance authority, single point of contact, coordinator of AI regulatory sandboxes, operator of the SME/public helpdesk and keeper of the…

Informacijski pooblaščenec (Information Commissioner)
Market surveillance authority for rights-sensitive and data-related high-risk AI

Agencija za zavarovalni nadzor, Banka Slovenije, Tržni inšpektorat RS
Sectoral market surveillance authorities (insurance, banking, consumer/market inspection); the Information Society Inspectorate supervises notified bodies, A…

NOTIFYING AUTHORITY

Five notifying authorities by AI system type: the ministries responsible for the economy, infrastructure, health and digital transformation, and the…

IMPLEMENTING LAW ENACTED

Zakon o izvajanju Uredbe (EU) o določitvi harmoniziranih pravil o umetni inteligenci (ZIUDHPUI), Uradni list RS št. 85/2025

MOST RECENT DEVELOPMENTS 3 OF 6 · NEWEST FIRST

JUL 2026
Slovenia ranked an AI Act frontrunner
Deloitte Legal's July 2026 benchmarking, as reported by Edupedu, placed Slovenia among seven frontrunners (with Cyprus, Finland, Hunga…
edupedu.ro

JUN 2026
AKOS launches first step toward the national sandbox
AKOS published a public call on 12 June 2026 inviting companies, researchers, public bodies and individuals to rank up to three Annex I/III areas f…
akos-rs.si

MAR 2026
National AI Strategy to 2030 adopted
The government adopted NsUI 2030 on 5 March 2026, after the Economic and Social Council supported it on 16 January 2026, succeeding th…
gov.si

ANALYSIS OPENING; FULL TEXT ONLINE

Slovenia treated AI Act implementation as a narrow, early task: the Ministry for Digital Transformation's March 2025 draft deliberately limited itself to naming competent authorities and setting offences and fines, on the reasoning that the regulation applies directly and needs no substantive national duplication. The government adopted the bill in August 2025 and the National Assembly passed it on 23 October 2025; the Zakon o izvajanju Uredbe (EU) o določitvi harmoniziranih pravil o umetni inteligenci (ZIUDHPUI) was published in Uradni list 85/2025 and took effect on 21…

SOURCES 8

AKOS - Agencija za komunikacijska omrežja in…	gov.si ↗
Informacijski pooblaščenec (Information…	gov.si ↗
Zakon o izvajanju Uredbe (EU) o določitv…	jadek-pensa.si ↗
Regulatory sandbox	akos-rs.si ↗
Nacionalna strategija za umetno inteligenco do let…	gov.si ↗
Slovenia ranked an AI Act frontrunner	edupedu.ro ↗
AKOS launches first step toward the national…	akos-rs.si ↗
Draft implementing act in public consultation	gov.si ↗

Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/slovenia/**

Verified 22 Oct 2026

PARTIALLY IN PLACE ES · RANK 13 OF 27 BY READINESS

Spain



Spain has the EU's first dedicated AI supervisory agency (AESIA, operating since 2023), a completed national sandbox cohort and 16 compliance guides, but its implementing Organic Law lapsed on 6 October 2026 when the Cortes were dissolved for the 29 November 2026 general election, leaving no national penalty regime or statutory authority allocation.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
Draft bill May 2026	**Not adopted**	**Operational**	**2024** Estrategia de Inteligencia Artificia…	AESIA - Agencia Española de Supervisión de la Inteligencia Artificial

KEY FINDINGS 5

- Spain is institutionally the most advanced of the nine (AESIA since 2023, sandbox cohort completed, 16 guides) but legislatively back to square one after the bill lapsed on 6 October 2026.
- No national Article 99 penalty regime exists; AESIA's enforcement powers against operators remain limited until an organic law is re-tabled by the next legislature (new Cortes convene 23 December…
- AESIA is the de facto single point of contact and the notified Spanish lead to the Commission; the sectoral allocation (AEPD, CGPJ, financial regulators) was only in the draft.
- The sandbox is genuinely operational - Spain ran the EU's first and its outputs feed AESIA guidance - though a second call had not been announced.
- The 2024 AI Strategy (EUR 1.5 billion, ALIA language models, AESIA's role) remains the governing policy document.

SANDBOX OPERATIONAL

Spain's AI regulatory sandbox, created by Real Decreto 817/2023 and run with the European Commission, completed its first cohort: 11 high-risk systems finished the programme at a closing event on 12 June 2026 an…

MARKET SURVEILLANCE AUTHORITIES 2

AESIA - Agencia Española de Supervisión de la Inteligencia Artificial
Central AI supervisory agency (created 2023) and Spain's interlocutor with the European Commission; general market surveillance authority and operator of…

Sectoral authorities (AEPD and regional DPAs, CGPJ, Banco de…
Proposed sectoral market surveillance authorities in the lapsed Proyecto de Ley Orgánica: data protection authorities for biometric, migration and border…

NOTIFYING AUTHORITY

None designated as of 22 Oct 2026.

IMPLEMENTING LAW DRAFT BILL

Proyecto de Ley Orgánica para el buen uso y la gobernanza de la inteligencia artificial (121/000096) - lapsed on dissolution of the…

MOST RECENT DEVELOPMENTS 3 OF 5 · NEWEST FIRST

OCT 2026
Cortes dissolved; AI bill lapses
Real Decreto 806/2026 of 5 October (BOE 6 October 2026) dissolved Congress and Senate and called elections for 29 November 2026. After six…
terceracamara.es

JUN 2026
First EU AI sandbox cohort concludes
The Ministry for Digital Transformation closed the first national AI regulatory sandbox on 12 June 2026, with 11 systems completing it and receivin…
digital.gob.es

MAY 2026
Government sends the Organic Law bill to Congress
Approved by the Council of Ministers on 26 May 2026 and registered in Congress on 28 May 2026 as Proyecto 121/000096; the Mesa del Congres…
ecija.com

ANALYSIS OPENING; FULL TEXT ONLINE

Spain built its AI Act institutions before it wrote its AI Act law. AESIA, headquartered in A Coruña, has existed since 2023 as Europe's first dedicated AI supervisory agency and is treated by the government and by the artificialintelligenceact.eu tracker as Spain's single point of contact. The Real Decreto 817/2023 sandbox, run with the European Commission, graduated eleven high-risk systems on 12 June 2026, and AESIA turned that work into 16 published compliance guides in February 2026. On capacity, guidance and sandboxing, Spain leads this group.

SOURCES 7

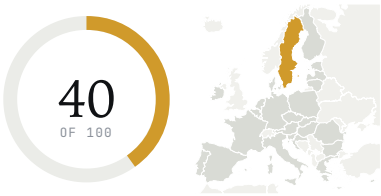
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Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/spain/**

Verified 22 Oct 2026

PARTIALLY IN PLACE SE · RANK 19 OF 27 BY READINESS

Sweden



Sweden has not yet enacted its AI Act complementary law: the October 2025 inquiry (SOU 2025:101) proposed PTS as coordinating market surveillance authority, single point of contact and sandbox host, but no bill had followed by October 2026, so the government bridged the gap with a 4 June 2026 decision assigning five agencies interim competent-authority roles until 31 December 2026.

IMPLEMENTING LAW	PENALTIES (ART. 99)	SANDBOX	NATIONAL AI STRATEGY	SINGLE POINT OF CONTACT
In consultation Oct 2025	**Not adopted**	**Planned**	**None** identified	Post- och telestyrelsen (PTS) - interim by government decision of 4 June 2026 (Art. 70(2)); proposed permanently in SOU 2025:101

KEY FINDINGS 5

- Sweden has a detailed blueprint (SOU 2025:101) but no bill: no lagrådsremiss or proposition had been published by October 2026.
- The government plugged the Article 70 gap administratively on 4 June 2026 by assigning PTS, IMY, Finansinspektionen, Läkemedelsverket and Swedac interim competent-authority roles…
- PTS as the central AI regulator is contested - Unionen and Saco want IMY or Arbetsmiljöverket to take workplace high-risk AI.
- No national penalty or intervention powers exist yet; the inquiry's sanction regime awaits legislation.
- The PTS-hosted sandbox is mandated on an interim basis but has not launched.

SANDBOX PLANNED

SOU 2025:101 proposes at least one AI regulatory sandbox established by PTS with other authorities participating in individual projects, originally targeted for 2 August 2026. The 4 June 2026 government decision task…

MARKET SURVEILLANCE AUTHORITIES 3

Post- och telestyrelsen (PTS)
Interim market surveillance authority for prohibited practices and Annex III high-risk systems in critical infrastructure, education, employment and parts of…

Integritetsskyddsmyndigheten (IMY), Finansinspektionen and…
Interim market surveillance authorities under the same 4 June 2026 decision: IMY for the remaining prohibited practices, Annex III areas 1, 5(b) in part and …

Eleven market surveillance authorities proposed in SOU 2025:101
The inquiry proposes eleven market surveillance authorities and two notifying authorities: PTS as main authority, PTS, IMY and Finansinspektionen sharing…

NOTIFYING AUTHORITY

Swedac (Styrelsen för ackreditering och teknisk kontroll) as general notifying authority and Läkemedelsverket for medical-device-related AI,…

IMPLEMENTING LAW IN CONSULTATION

Lag med kompletterande bestämmelser till EU:s AI-förordning (proposed in SOU 2025:101 'Anpassningar till AI-förordningen'; no …

MOST RECENT DEVELOPMENTS 3 OF 7 · NEWEST FIRST

AUG 2026

2 August 2026 passes without the complementary law

The inquiry's intended application date for the Swedish act came and went, and by October 2026 no lagrådsremiss or proposition on the…

regeringen.se

JUL 2026

Digital Omnibus on AI changes the deadlines Sweden was working to

Regulation (EU) 2026/1744 (in force 27 July 2026) postponed Annex III high-risk obligations to 2 December 2027 and the sandbox deadline to 2…

cuatrecasas.com

JUN 2026

Government appoints five interim competent authorities

By decision of 4 June 2026 (Fi2026/01365), announced by PTS on 16 June, the government assigned PTS, IMY, Finansinspektionen,…

regeringen.se

ANALYSIS OPENING; FULL TEXT ONLINE

Sweden followed its standard legislative method - a government inquiry, a consultation round, then a bill - and the method has not yet delivered. The AI Regulation Inquiry's report, SOU 2025:101 'Anpassningar till AI-förordningen', was handed to the Ministry of Finance on 6 October 2025 and proposed a single complementary act plus ordinance, a system of eleven market surveillance authorities with the Post and Telecom Authority (PTS) holding main responsibility, Swedac and the Medical Products Agency as notifying authorities, administrative fines and intervention powers applicab…

SOURCES 8

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Eleven market surveillance authorities…	regeringen.se ↗
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Unionen contests PTS role for workplace AI	regeringen.se ↗
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Full sources and analysis: **imiel.dev/explore/eu-ai-act-2026/sweden/**

Verified 22 Oct 2026

08 Methodology

SCHEMA, STATUS, SCORE, VERIFICATION

How the profiles were built

Every country profile was researched against the same schema: market surveillance and notifying authorities, single point of contact, the national implementing law and its status, whether an Article 99 penalty regime is in force, the regulatory sandbox, the national AI strategy and a dated log of notable developments. Only reachable primary or reputable secondary sources were allowed (government and regulator sites, the European Commission, EUR-Lex, the FLI AI Act Explorer, law-firm trackers, IAPP), and every claim carries its URL.

What the status means

FRAMEWORK IN PLACE
The national framework the Act requires is legally in force.

PARTIALLY IN PLACE
Authorities act, but the law, penalties or sandbox are still missing.

LAGGING
Little beyond a fundamental-rights designation exists.

What the score means

The 0–100 readiness score is an evidence-based editorial judgement per country, explained in each profile's analysis, and not a statistical index.

Verification

Every file was fact-checked on 22 Oct 2026 in a second pass against the cited sources. Claims that could not be confirmed were removed, so every fact in this report links to a source that supports it.

Print edition

Country pages print the summary, the key findings, up to four market surveillance authorities, the three most recent developments, the opening paragraph of the analysis and the main sources. Anything cut to fit the page is marked with an ellipsis or a count, and the complete record is one click away at imiel.dev/explore/eu-ai-act-2026/.

09 Sources

26 OVERVIEW SOURCES

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03 European Commission - General-Purpose AI Code of Practice and signatory list
https://digital-strategy.ec.europa.eu/en/policies/contents-code-gpai

04 European Commission - Strong backing for the Code of Practice on Transparency of AI-generated Content (31 Jul 2026)
https://digital-strategy.ec.europa.eu/en/news/strong-backing-code-practice-transparency-ai-generated-content

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https://digital-strategy.ec.europa.eu/en/policies/ai-scientific-panel

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https://techcrunch.com/2025/07/18/meta-refuses-to-sign-eus-ai-code-of-practice/

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PER-COUNTRY SOURCES

Listed on each country page and in full on the web profile, imiel.dev/explore/eu-ai-act-2026/<country>/.

COLOPHON

Report generated 22 Oct 2026 from verified data. Set in Iowan Old Style, Helvetica Neue and JetBrains Mono; map geometry from Natural Earth. The interactive edition lives at imiel.dev/explore/eu-ai-act-2026/.