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AI ACT TIMELINE QUICK CARD: THE AMENDED COMPLIANCE SCHEDULE

THE GOVERNING OMNIBUS LESSON:

Dates move; substance doesn't. The high-risk duties arriving in December 2027 are the identical duties originally scheduled for August 2026 — risk management (Art 9), data governance (Art 10), record-keeping (Art 12), human oversight (Art 14), and post-market monitoring (Art 72). Organisations that treat the deferral as a holiday will rebuild under acute regulatory panic; organisations that use it as schedule relief arrive with production-hardened evidence.

THE MASTER TIMELINE, AS AMENDED — REGULATION (EU) 2024/1689 & REGULATION (EU) 2026/1744

Governing Source: Post 930

Enforcement Date	Status / Tier	What Applies & Statutory Scope	Immediate Operational Implication
Feb 2, 2025	ACTIVE LAW	**Prohibited Practices Banned; AI Literacy Duties Live** Bans cognitive manipulation, social scoring, biometric categorization, real-time public biometric ID. Mandatory staff AI literacy.	Immediate cessation of banned applications; documented workforce training and AI literacy curricula implemented across all departments.
Aug 2, 2025	ACTIVE LAW	**General-Purpose AI (GPAI) Model Obligations Apply** GPAI provider transparency, technical documentation, copyright compliance policies, detailed training data summaries.	Procurement diligence must verify GPAI vendor compliance; providers of systemic foundation models face direct EU AI Office supervision.
Aug 2, 2026	ACTIVE LAW	**Article 50 Transparency Applies + GPAI Enforcement** Users must be informed they are interacting with AI; synthetic text, audio, and visual outputs must be marked machine-readably. European Commission GPAI fining powers live.	Point-of-use UI disclosure required; synthetic content watermarked via C2PA standards. Commission begins issuing binding non-compliance penalties.
Dec 2026	GRACE EXPIRY	**Grace Note for Pre-August 2026 On-Market Systems** Systems already placed on the market before August 2, 2026 had a short grace window to bring synthetic content marking into full technical compliance.	Zero grandfathering relief remaining after December 2026; legacy model deployments must fully output machine-readable content credentials.
Dec 2, 2027	DEFERRED 16 MO	**Annex III Standalone High-Risk Obligations Apply** Deferred 16 months by Digital Omnibus on AI (Regulation (EU) 2026/1744, in force July 27, 2026). Covers biometric, critical infra, education, HR/employment, essential private/public services (credit, insurance), law enforcement, justice.	Full compliance mandatory: Quality Management Systems, Art 9 risk management, Art 10 data lineage, Art 12 record-keeping, Art 14 human oversight, Art 27 FRIAs.
Aug 2, 2028	DEFERRED BY OMNIBUS	**Annex I High-Risk Embedded Systems (Regulated Products)** AI safety components in EU-harmonised product legislation (medical devices, machinery, civil aviation, vehicles) also deferred by the Omnibus.	Conformity assessment integrated directly with third-party CE mark sectoral certification audits (e.g. MDR, Machinery Directive).

WHAT DID NOT MOVE (STRICT ENFORCEMENT NOW)

- **Article 50 Transparency is live:** Mandatory user interaction disclosure and machine-readable synthetic content marking.
- **December 2026 Grace Note:** Legacy models deployed before August 2026 have only until December 2026 to achieve content-marking compliance.
- **GPAI Model Rules:** Have applied since August 2025; EU Commission enforcement and fining powers fully operational.
- **Prohibited Practices:** Zero tolerance for dark patterns, social scoring, or unapproved biometric identification.

THE DEFERRAL RATIONALE & BENEFIT (DEC 2027)

- **16-Month Runway:** Regulation (EU) 2026/1744 shifted Annex III from August 2026 to December 2, 2027.
- **Testing Under Low Stakes:** Allows 16 months to pilot logging, drift telemetry, and HITL circuits while errors remain cheap.
- **Standard Harmonisation:** Grants European standardization bodies time to publish harmonised technical standards (CEN-CENELEC).
- **Mock Conformity:** Time to run mock audits with third-party notified bodies before regulatory penalties engage.

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AI ACT TIMELINE QUICK CARD: THE DECEMBER 2027 HIGH-RISK ROADMAP

THE THREE-PHASE COMPLIANCE EXECUTION ROADMAP TO DECEMBER 2, 2027

Governing Source: Post 930

Phase & Window	Core Operational Workstreams	Mandatory Deliverables & Records
Phase 1: Now (2026) IMMEDIATE ACTION	• **Comprehensive Model Inventory:** Discover and catalogue every model across in-house, fine-tuned, vendor API, and embedded features. • **Four-Tier Classification:** Sort estate into Prohibited, High-Risk (Annex III), Transparency-Only (Art 50), and Minimal Risk. • **Article 50 Verification:** Enforce interaction disclosure UX and C2PA metadata tagging across customer and employee interfaces. • **Framework Gap Analysis:** Map operations against ISO/IEC 42001:2023 and NIST AI RMF 1.0 / AI 600-1 GenAI profile.	• Complete Enterprise Model Inventory Register • Model Tiering Decision Log & RACI per system • Article 50 Content Credential Verification Audit • ISO 42001 / NIST AI RMF Gap Analysis Matrix
Phase 2: Through 2027 BUILD & INSTRUMENT	• **Logging Infrastructure:** Build automated event logging on write-once (WORM) storage retained for ≥ 6 months (Arts 12 & 26). • **Bias & Fairness Circuitry:** Implement real-time monitoring of Adverse Impact Ratio (0.80 freeze rule), equalized odds (≤ 0.05), and demographic parity (≤ 0.10). • **Human-in-the-Loop Escalations:** Construct automated review pipelines routing confidence < 0.85 or guardrail trips to human overseers. • **Compute & ESG Telemetry:** Wire inference and training workload energy tracking into CSRD ESRS E1/E3 reporting pipelines.	• WORM-Retained 6-Month Telemetry Logs • Model Fairness & AIR Monitoring Dashboard • HITL Operator Oversight & Override Audit Log • Compute Energy & Water Accounting Pipeline (PUE/WUE)
Phase 3: Pre-Dec 2027 FILING & CERTIFICATION	• **Technical Documentation Suites:** Compile Annex IV technical files detailing architecture, design, and algorithmic mechanics. • **FRIA Execution:** Conduct Fundamental Rights Impact Assessments (Art 27) for mandatory credit, insurance, and public body systems. • **Quality Management System:** Finalise ISO 42001-aligned QMS encompassing post-market monitoring (Art 72) and incident clocks (Art 73). • **Mock Conformity Assessment:** Contract third-party review while errors remain cheap to fix before statutory fines engage.	• Complete Article 11 / Annex IV Technical File • Signed Article 27 FRIA Reports & Stakeholder Consults • Article 73 Incident Response Playbook (15/10/2-day clocks) • Pre-Audit Conformity Verification Certificate

CORE STATUTORY CITATION CHEAT SHEET

- **Regulation (EU) 2024/1689:** The EU Artificial Intelligence Act.
- **Regulation (EU) 2026/1744:** Digital Omnibus on AI (OJ July 24, 2026).
- **Art 9:** Risk Management System • **Art 10:** Data Governance & Lineage.
- **Art 12 & 26:** Record-Keeping & Automated Event Logging (≥6 Months).
- **Art 14:** Human Oversight • **Art 27:** Fundamental Rights Impact Assessment.
- **Art 50:** Transparency • **Art 72:** Post-Market Monitoring • **Art 73:** Incident Reporting.

THE COMPLIANCE PROGRAMME REALITY

Programmes that treat the 16-month Digital Omnibus extension as an engineering build sprint will experience December 2, 2027 as a routine regulatory filing exercise. Programmes that defer governance development will experience it as a high-stakes, crisis-driven regulatory incident under multi-million-euro penalty exposure.