

# International Overview of AI Regulation

7-7-25

## EU European Union: The AI Act

- **Most comprehensive legal framework to date.**
- **Passed:** March 2024; **effective:** key provisions begin in 2025–2026.
- **Risk-based approach:**
  - **Prohibited AI** (e.g., social scoring, emotion recognition in workplaces).
  - **High-risk AI** (e.g., biometrics, employment, education): strict obligations on transparency, human oversight, risk management.
  - **Limited-risk AI:** transparency requirements (e.g., chatbots must identify as bots).
- Heavy **penalties:** up to €35 million or 7% of global revenue.
- Applies **extraterritorially** to providers marketing in the EU.

## CN China: Focus on Content Control & Algorithm Registration

- Emphasis on **state control, censorship, and social stability.**
- **Algorithm regulation:** Requires registration of recommendation algorithms (since 2022).
- **Generative AI Measures:** As of August 2023, all gen-AI services must:
  - Submit for government approval,
  - Ensure content aligns with “core socialist values,”
  - Label synthetic content.
- Penal enforcement tied closely to China’s cybersecurity law.

## US United States: Sector-Specific & State-Driven

- **No federal AI law yet.** Instead:
  - **Executive Orders** (Biden EO 14110) on safe, secure AI development.
  - **FTC enforcement** under UDAP (unfair/deceptive acts).
  - **State laws** (e.g., California, Colorado, Utah).
- **Key strategy:** Use existing consumer protection, civil rights, and privacy laws + federal agency guidance.

## GB United Kingdom: “Pro-Innovation” Framework

- **No standalone AI law yet.**
- Government white paper (2023) favors **light-touch, non-statutory principles:**
  - Safety, fairness, transparency, accountability.
- Relies on **existing regulators** (e.g., ICO, CMA, Ofcom) to apply guidance in context.
- Still consulting on potential legislation if risks warrant it.

## JP Japan: Trust-based Soft Governance

- Focuses on **voluntary compliance and industrial promotion.**
- AI Strategy Council promotes **human-centric AI**, with sector-specific codes.
- Prefers **international alignment** (G7, OECD) over domestic legal mandates.

## CA Canada: Bill C-27 / AIDA

- Proposes **Artificial Intelligence and Data Act (AIDA)** as part of Bill C-27 (still under consideration).
- Would regulate **“high-impact systems”**, with requirements for:
  - Risk assessments,
  - Record keeping,
  - Transparency,
  - Testing.
- Enforced by new **AI and Data Commissioner**.

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 **Multilateral Initiatives**

- **OECD AI Principles**: First international framework (adopted by 40+ countries).
- **G7 Hiroshima Process (2023)**: Guiding principles on “trustworthy AI.”
- **UN AI Advisory Body**: Formed to guide global governance, issued a roadmap in 2024.
- **Global Partnership on AI (GPAI)**: Supports responsible development.

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 **Summary Table**

Region	Legal Approach	Focus Areas
EU	Binding risk-based regulation	High-risk uses, transparency, accountability
China	State control, content regulation	Ideological alignment, algorithm registry
U.S.	Sectoral + state patchwork	Consumer protection, innovation
UK	Regulator-led guidance	Pro-innovation, no immediate legislation
Japan	Soft law + global coordination	Voluntary codes, international norms
Canada	Proposed law under debate	High-impact system oversight