

# EU AI Act

## Compliance Starter Kit

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Key Documents & Resources for Japanese Stakeholders

Companion to: The EU's General Purpose AI Code of Practice — Briefing for Japan  
March 2026

### How to Use This Starter Kit

This document provides an annotated list of the primary EU-level instruments that any Japanese company, research institution, or government body engaging with the EU AI Act should have to hand. The annexes are organised in four categories: **foundational legislation**, **GPAI-specific instruments**, **guidance on high-risk AI systems**, and **compliance support tools**. Each entry includes a short description of the document, its legal status, its relevance to Japanese stakeholders, and — where applicable — the deadline or timeline to which it relates.

*These documents are publicly available from the European Commission and the EU AI Office. They should be read in conjunction with specialist legal and technical advice; this starter kit does not constitute legal advic.*

#### CATEGORY A — FOUNDATIONAL LEGISLATION

ANNEX A.1

Regulation (EU) 2024/1689 — The AI Act

*The primary legal text governing AI systems and GPAI models in the EU*

|          |                                                   |
|----------|---------------------------------------------------|
| Status   | In force since 1 Aug 2024                         |
| Applies  | Phased: Feb 2025 / Aug 2025 / Aug 2026 / Aug 2027 |
| Source   | EUR-Lex / OJ EU 2024/1689                         |
| Language | All 24 EU official languages                      |

**What it is:** The AI Act is the world's first comprehensive horizontal regulation on artificial intelligence. It establishes a risk-based framework covering prohibited AI practices, high-risk AI systems, GPAI models, and transparency obligations. It applies to any provider, importer, distributor or deployer of AI systems whose outputs are used in the EU, regardless of where they are established.

**Why it matters for Japanese firms:** Any Japanese company placing an AI-enabled product on the EU market, or deploying AI in EU-based operations, is subject to this Regulation. It creates binding obligations — including conformity assessment, CE marking, and technical documentation — for AI systems classified as high-risk, and separate obligations for GPAI model providers.

Key provisions for initial review:

- Article 3 — Definitions (AI system, GPAI model, provider, deployer)
- Annex I — List of AI techniques and approaches
- Annex III — High-risk AI system use cases
- Chapter V (Articles 51–56) — Obligations for GPAI model providers
- Article 113 — Phased entry into application dates

ANNEX A.2

EU AI Office — Institutional Overview

*The primary supervisory body for GPAI models and central coordination hub*

|            |                                |
|------------|--------------------------------|
| Status     | Operational since 2024         |
| Role       | GPAI supervision & enforcement |
| Contact    | Via EU SEND portal             |
| Fines from | 2 August 2026                  |

**What it is:** The AI Office is a body of the European Commission (housed within DG CONNECT) established to supervise and enforce the GPAI provisions of the AI Act. It became fully operational on 2 August 2025. It also coordinates with national market surveillance authorities, manages the GPAI Code of Practice process, and maintains the EU SEND portal through which GPAI providers submit regulatory documents.

**Why it matters:** The AI Office is the primary point of contact for GPAI providers. Its stated enforcement posture is collaborative and risk-based, with informal engagement encouraged during training phases. For Japanese companies seeking to build a regulatory relationship before formal enforcement begins in August 2026, the AI Office is the correct interlocutor.

**Key entry points:**

- [digital-strategy.ec.europa.eu/en/policies/ai-office](https://digital-strategy.ec.europa.eu/en/policies/ai-office)
- AI Office public consultations and workshops

CATEGORY B — GPAI-SPECIFIC INSTRUMENTS

ANNEX B.1

## GPAI Code of Practice (Final, July 2025)

*The primary voluntary compliance tool for GPAI model providers*

|              |                                                                                               |
|--------------|-----------------------------------------------------------------------------------------------|
| Status       | Final, July 2025                                                                              |
| Legal effect | Presumption of conformity                                                                     |
| Signatories  | 28 organisations (as of Jan 2026)                                                             |
| Source       | AI Office / <a href="https://digital-strategy.ec.europa.eu">digital-strategy.ec.europa.eu</a> |

**What it is:** The Code of Practice is a voluntary instrument developed through a multi-stakeholder process convened by the AI Office. It sets out specific measures that providers of GPAI models may implement to demonstrate compliance with their obligations under Articles 53(1) and 55(1) of the AI Act. Adherence confers a rebuttable presumption of conformity. The Code has three chapters: Transparency (all providers), Copyright (all providers), and Safety and Security (systemic-risk providers only).

**Why it matters:** Signing the Code is the most straightforward path to compliance for GPAI providers and reduces administrative burden in regulatory interactions. Non-signatories must demonstrate compliance through alternative means and should expect greater scrutiny from the AI Office, including more frequent requests for information and documentation of lifecycle modifications.

- Chapter 1: Transparency — model documentation, downstream information sharing
- Chapter 2: Copyright — opt-out compliance, training data summaries
- Chapter 3: Safety & Security — systemic risk assessment, incident reporting, adversarial testing (systemic-risk models only)

ANNEX B.2

## Commission Guidelines on the Scope of GPAI Obligations (July 2025)

*The Commission's authoritative interpretation of who is subject to GPAI duties*

|              |                                    |
|--------------|------------------------------------|
| Status       | Adopted 18 July 2025               |
| Legal effect | Non-binding; enforcement reference |
| Reference    | C(2025) 5045 final                 |
| Source       | EUR-Lex / EC Digital Strategy      |

**What it is:** Published on 18 July 2025 pursuant to Article 96(1) of the AI Act, these guidelines clarify: (i) when a model qualifies as a GPAI model (indicative threshold: >10<sup>23</sup> FLOP with language/image generation capability); (ii) who qualifies as a provider; (iii) when a downstream modifier becomes a provider (indicative threshold: modification compute >1/3 of original training compute); (iv) conditions for the open-source exemption; and (v) the Commission's enforcement approach and transitional expectations.

**Why it matters:** Although not legally binding, these guidelines set out the position on which the Commission will base its enforcement. They are the essential reference for any Japanese company assessing whether its models fall within GPAI scope, and for understanding the pre-training notification obligation for systemic-risk models.

- Annex to the guidelines: detailed methodology for estimating training compute (hardware-based and architecture-based approaches)
- Training compute threshold for systemic risk: >10<sup>25</sup> FLOPs (cumulative)

ANNEX B.3

Template for Public Summary of GPAI Training Content

Mandatory disclosure template for all GPAI model providers

|             |                      |
|-------------|----------------------|
| Status      | Published July 2025  |
| Legal basis | Art. 53(1)(d) AI Act |
| Applies to  | All GPAI providers   |
| Source      | AI Office portal     |

**What it is:** A standardised template published by the AI Office that GPAI model providers must use when preparing the public summary of content used for training, as required by Article 53(1)(d) of the AI Act. The template requests information on data sources, domain names, data processing methods, and measures taken to ensure copyright compliance.

**Why it matters:** Completion of this template is a mandatory obligation for all GPAI providers, including those that qualify for the open-source exemption. Japanese providers should note that the template requires disclosure of whether and how text and data mining opt-outs under EU copyright law were identified and respected — an area where Japan’s more permissive domestic copyright framework (Article 30-4 of the Copyright Act) provides no automatic equivalence.

CATEGORY C — HIGH-RISK AI SYSTEMS

ANNEX C.1

AI Act Annex III — High-Risk AI Use Cases

*The definitive list of AI applications subject to mandatory conformity assessment*

|              |                                                     |
|--------------|-----------------------------------------------------|
| Applies from | Aug 2026 (standalone) / Aug 2027 (in products)      |
| Assessment   | Third-party conformity assessment required for most |
| CE Marking   | Mandatory before EU market placement                |
| Source       | AI Act, Annex III                                   |

**What it is:** Annex III of the AI Act lists the categories of AI system that are classified as high-risk and are therefore subject to the full suite of obligations under Chapter III, Section 2 — including technical documentation, risk management systems, data governance, human oversight mechanisms, accuracy and robustness requirements, and (in most cases) third-party conformity assessment by a notified body before CE marking.

- Categories most relevant to Japanese industry:**
- Safety components of machinery and industrial equipment (directly relevant to robotics manufacturers including FANUC, Yaskawa, Kawasaki)
  - AI in medical devices and in vitro diagnostic devices (relevant to surgical-assist and healthcare robotics)
  - AI systems for recruitment and HR decisions (relevant to any company using AI in EU employment processes)
  - AI in critical infrastructure management (energy, transport, water)
  - AI in educational access and assessment

**Why it matters:** Any Japanese product incorporating an AI system that falls within Annex III cannot lawfully be placed on the EU market after August 2026 (standalone systems) or August 2027 (AI in regulated products) without a completed conformity assessment and CE mark. Product design and documentation processes must be adapted accordingly — and notified body engagement should begin well in advance of these deadlines.

ANNEX C.2

Commission Guidelines on Prohibited AI Practices (Feb 2025)

*Clarification of the eight absolute prohibitions in Article 5 of the AI Act*

|             |                                     |
|-------------|-------------------------------------|
| Status      | Applicable since 2 Feb 2025         |
| Fines       | Up to €35m or 7% of global turnover |
| Legal basis | Art. 5 AI Act                       |
| Source      | EC Digital Strategy portal          |

**What it is:** Published in February 2025 to coincide with the entry into application of the Article 5 prohibitions, these guidelines explain which AI practices are banned outright under the AI Act: subliminal manipulation, exploitation of vulnerabilities, social scoring by public authorities, real-time remote biometric identification in public spaces, emotion recognition in workplace/educational contexts, biometric categorisation to infer sensitive characteristics, and AI-enabled crime prediction based on profiling.

**Why it matters:** These prohibitions apply immediately and without transitional relief. Japanese companies operating AI systems in EU contexts — including HR analytics tools, employee monitoring software, or customer-facing AI — should verify their systems do not engage in any prohibited practice. The consequences of violation are the highest fines under the Act: up to €35 million or 7% of global turnover.

ANNEX C.3

ISO/IEC 42001:2023 — AI Management System Standard

*International standard for AI governance infrastructure; closely aligned with AI Act obligations*

|               |                                                  |
|---------------|--------------------------------------------------|
| Status        | Published Dec 2023                               |
| Certification | Available from accredited bodies                 |
| Relevance     | High — maps to Art. 9, 10, 17 AI Act obligations |
| Source        | ISO / JSA (Japanese Standards Association)       |

**What it is:** ISO/IEC 42001 specifies requirements for establishing, implementing, maintaining, and continually improving an AI management system within an organisation. It is the international equivalent of ISO 9001 for AI governance, and its structure maps closely onto the quality management system requirements imposed on providers and deployers of high-risk AI systems under the AI Act.

**Why it matters:** For Japanese manufacturers already operating under ISO 9001 or sector-specific quality standards such as IATF 16949, ISO 42001 provides a familiar governance framework that can be extended to cover AI-specific obligations. Certification to ISO 42001 will not in itself provide a presumption of conformity under the AI Act — that requires compliance with harmonised standards once published — but it provides strong evidence of systematic AI governance and is likely to be viewed favourably by regulators and notified bodies. Japanese companies should consider it an essential foundation for any AI Act compliance programme.

CATEGORY D — COMPLIANCE SUPPORT & JAPAN-SPECIFIC RESOURCES

ANNEX D.1

EU AI Act Implementation Timeline  
(Official)

Consolidated schedule of all binding compliance deadlines

|         |                                                      |
|---------|------------------------------------------------------|
| Source  | artificialintelligenceact.eu/implementation-timeline |
| Updated | Continuously                                         |
| Format  | Free, online; printable                              |

**What it is:** The AI Office and EC Digital Strategy portal maintain an official, regularly updated implementation timeline listing every binding deadline under the AI Act — from the February 2025 prohibitions through to the 2030 deadline for large-scale IT systems. The timeline cross-references the relevant legal provisions, making it the essential calendar for compliance planning.

Key dates for Japanese companies:

- 2 February 2025 — Prohibited practices ban in effect
- 2 August 2025 — GPAI obligations in effect; AI Office operational
- 2 August 2026 — Full enforcement begins (GPAI fines); most high-risk AI obligations apply
- 2 August 2027 — High-risk AI in regulated products must comply; legacy GPAI models must comply
- 2 August 2027 — Authorised representative requirement in full effect for non-EU providers

ANNEX D.2

EU-Japan Centre for Industrial  
Cooperation — AI & Digitalisation  
Resources

Joint EU-Japan body providing sector-specific regulatory intelligence and business support

|          |                                     |
|----------|-------------------------------------|
| Founded  | 1987 (EC / METI joint venture)      |
| Offices  | Tokyo & Brussels                    |
| Services | Free to EU & Japanese organisations |
| Source   | eu-japan.eu                         |

**What it is:** The EU-Japan Centre for Industrial Cooperation, established jointly by the European Commission and Japan's Ministry of Economy, Trade and Industry (METI), provides business intelligence, regulatory analysis, and networking support for companies operating across the EU-Japan corridor. Its technology and digitalisation programme covers AI regulation, robotics, and digital trade, and it maintains an active programme of briefings, sector reports, and business missions specifically addressing EU regulatory developments.

**Why it matters:** For Japanese companies without an established EU regulatory affairs function, the Centre provides a cost-effective first point of entry for understanding applicable EU rules and identifying relevant European counterparts — including law firms, technical consultancies, and notified bodies — with expertise in AI Act compliance. It also provides support for Japanese companies seeking to establish or scale EU operations, including guidance on appointing authorised representatives.

- Website: eu-japan.eu
- Brussels office (for EU regulatory affairs): eu-japan.eu/contact
- Tokyo office (for Japan-side enquiries): eu-japan.eu/contact



ANNEX D.3

JETRO — EU AI Act Compliance Resources for Japanese Businesses

*Japan External Trade Organization: market entry and regulatory support in Europe*

|          |                            |
|----------|----------------------------|
| Type     | Japanese government agency |
| Offices  | Multiple EU locations      |
| Language | Japanese & English support |
| Source   | jetro.go.jp                |

**What it is:** JETRO (Japan External Trade Organization) provides Japanese companies with market intelligence, regulatory guidance, and in-market support across Europe. Its offices in Brussels, Düsseldorf, Paris, Milan, and other EU cities offer personalised guidance on EU product regulations — including the AI Act — and can assist with identifying European legal counsel, notified bodies, and conformity assessment infrastructure.

**Why it matters:** JETRO has been actively monitoring EU AI regulation since the early drafting stages and has published Japanese-language analyses of the AI Act's impact on key sectors including automotive, electronics, and manufacturing. For companies seeking an initial orientation in their own language before engaging EU-based advisors, JETRO's published materials and advisory services are an accessible starting point.

- JETRO Brussels: [jetro.go.jp/world/europe/be](https://jetro.go.jp/world/europe/be)
- JETRO AI Act briefings: available via [jetro.go.jp](https://jetro.go.jp) (search: EU AI Act)

ANNEX D.4

EU AI Act Compliance Checklist — Initial Self-Assessment

*A practical first-pass framework for mapping obligations to your organisation*

|         |                                                        |
|---------|--------------------------------------------------------|
| Status  | Various sources; ongoing development                   |
| Applies | All organisations using or developing AI in/for the EU |
| Format  | Varies; most freely available online                   |

**What it is:** No single official checklist yet exists for EU AI Act compliance across all risk tiers. However, the AI Office, several national data protection authorities (notably the French CNIL and the German BfDI), and leading law firms have published preliminary self-assessment frameworks. These typically cover: AI system inventory and classification, risk tier determination, data governance gap analysis, documentation readiness, and supply chain due diligence. The Commission's own implementation guidance for SMEs is also a useful starting point for smaller organisations.

**Recommended sources for initial self-assessment:**

- AI Office — GPAI provider self-assessment guidance ([digital-strategy.ec.europa.eu](https://digital-strategy.ec.europa.eu))
- CNIL — Guide pratique IA (available in French and English)
- BSI (UK) / DIN (Germany) — AI Act readiness toolkits

**A note on limitations:** Self-assessment frameworks are a starting point, not a substitute for specialist legal and technical advice. The interaction between GPAI obligations, high-risk requirements, sector-specific regulations (MDR, Machinery Regulation, GDPR), and Japan's domestic AI guidelines requires cross-disciplinary expertise that no checklist can fully replicate.