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# **Analysis of artificial intelligence regulation in countries and regions around the world**

Baseline analysis for the overview of  
possible regulatory approaches of artificial  
intelligence

## Executive summary

This analysis of different regulatory instruments across the world is part of the Federal Council's mandate of 22 November 2023, assigned to DETEC (OFCOM) and the FDFA (Europe Division), to compile an overview of possible regulatory approaches to artificial intelligence (AI). As part of this work, OFCOM has been tasked with conducting an analysis of artificial intelligence regulation in countries and regions around the world.

Between spring and autumn 2024, OFCOM, with the support of the FDFA, analysed regulatory activities in 20 selected countries across six continents. This analysis was based on five criteria. In particular, it examined the content of the regulation (formal: binding/non-binding; material), application (public/private), scope (sectoral/horizontal), current status and governance (competent ministries or supervisory bodies and envisaged penalties).

The analysis found that there are many different approaches to AI regulation around the world; there is no single clear-cut regulatory approach. Most of the countries analysed have at least a national AI strategy or action plan. However, with the exception of the EU Member States, where the AI Act has been in force since 1 August 2024, very few countries had AI-specific legally binding instruments in force by autumn 2024. Both the United States and China are examples of countries that already have legally-binding instruments. Most countries are currently in a discussion or negotiation phase, although the development of legally binding instruments governing AI is already well advanced in some countries (e.g., Canada, Brazil and South Korea).

As to whether AI should be regulated through a cross-cutting horizontal legislative act or through various sectoral legislative acts, no clear trend exists at international level. Some of the countries analysed (such as the UK, Israel and China) favour a sector-specific regulatory approach, while others (such as Canada, Brazil, South Korea and the EU with its AI Act) opt for a horizontal approach, i.e., they define AI principles that apply to all sectors.

In most of the countries analysed, regulatory efforts are aimed at both the public and private sectors. Some countries (e.g., Australia, Japan and Singapore) limit themselves to guidelines for the private sector and have refrained from enacting binding regulations. The risk-based approach to AI regulation, as adopted by the EU in the AI Act, appears to be taken up by other countries internationally. Canada and Brazil, for example, are drawing on this model in their current AI bills.

With regard to governance, some countries have created new structures specifically for AI, while others are building on existing ministries and regulators in the fields of justice, science and innovation, communication or security, and giving them the means to deal with the new challenges relating to AI. In some cases, considerable financial resources have been allocated for this purpose. The AI Safety Summit at Bletchley Park in 2023 resulted in the creation of numerous AI Safety Institutes in many countries around the world such as the UK, US, Japan, Canada and many others. In November 2024, the AI Safety Institute International Network met for the first time to accelerate progress in AI safety science worldwide.<sup>1</sup>

The country analysis shows that regulatory approaches to AI vary considerably around the world. What the 20 countries analysed have in common, however, is a general recognition of the need for action on AI regulation.

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<sup>1</sup> UK Government (2023), *Introducing the AI Safety Institute*, available at <https://www.gov.uk/government/publications/ai-safety-institute-overview/introducing-the-ai-safety-institute> (accessed 4 December 2024).

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## 1. Introduction

Artificial intelligence (AI) has emerged as one of the most influential technologies in recent years, promising to radically transform many aspects of our society and economy. In view of this transformation, it is necessary to examine whether there is a need to provide a regulatory framework for the development and deployment of AI. With this in mind, the Federal Council tasked DETEC (OFCOM) and the FDFA (Europe Division) in its decision of 22 November 2023 to compile an overview of possible regulatory approaches to AI in Switzerland.

This analysis of AI regulation in countries and regions around the world is one of the 'baseline analyses' used to compile this overview. This analysis of regulatory objectives and approaches provides insights into how AI is regulated abroad as well as inspiration for Switzerland's own regulatory framework for AI.

## 2. Methodology and evaluation criteria

It is important to obtain a global view of regulatory objectives and approaches around the world. Accordingly, this analysis evaluates regulatory approaches in 20 different countries. These countries are analysed by continent and according to 5 evaluation criteria. The criteria are applied if the country in question has a legal instrument governing AI. Given that not all countries have such an instrument, the analyses are not carried out in the same depth for all countries.

The methodology is based on an analysis of national and international data, as well as in-depth case studies in each selected country. Most of the information was via publicly available information, then verified by the Swiss embassies in the countries concerned.

The evaluation criteria are as follows:

### a. Formal and material content

Formal content refers to the type of measures adopted and whether they are binding or non-binding. AI can be regulated using a variety of instruments, ranging from action plans to legislation. The nature of each instrument is listed in this section.

Material content refers to the approach and content of the measures taken. Some measures aim to regulate market access, while others are designed to protect fundamental rights. All these elements are analysed in this section.

### b. Public-private application

Existing standards can be applied to both the public and private sectors. It is up to legislators to decide which actors are covered. It is not uncommon for some regulatory instruments to be directed solely at government, while others also apply to the private sector.

### c. Scope

A distinction is generally made between sector-specific regulation and horizontal (or cross-sector) regulation. Sector-specific regulation applies to a particular sector, such as the automotive or medical sector. Horizontal regulation applies uniformly to different sectors or industries, rather than targeting them specifically. Distinctions may nevertheless be made within horizontal regulation, in particular more detailed specifications for individual sectors. It is important to note that this distinction between sectoral and horizontal regulation is not always obvious.

### d. Current status

Given that AI is a relatively recent topic in the world of regulation, some instruments have not yet been officially or formally adopted. It is therefore interesting to know the stage of adoption and application for each instrument examined. It is important to note that an instrument's stage is determined as of the date of writing of this analysis, i.e., November 2024.

### e. Governance

The final criterion used for this analysis relates to the competent authority designated to ensure the correct application of the regulatory framework. Some countries have assigned responsibility for this to an existing ministry, while others have created a special *ad hoc* body. It is also relevant to establish whether any sanction mechanisms exist and what form they take.

### 3. Analysis of AI regulation in countries and regions around the world

#### 3.1. Africa

In Africa, measures to accelerate the adoption of AI are multiplying, and AI-related investment and innovation are making headway. Generally speaking, African countries have been comparatively slow to adopt AI technologies for a variety of reasons, ranging from infrastructure problems to limited financial resources.

At the regional level, the African Union (AU), made up of 55 member states, has developed a continental strategy on AI (AU AI Strategy).<sup>2</sup> The aim of this ambitious strategy is to create an AI policy that envisages an Africa-centric path for the development and regulation of this emerging technology. The draft strategy was published in February 2024 by the AU's development agency.<sup>3</sup> The project includes recommendations for industry-specific practices, standards and certification bodies to evaluate and compare AI systems, regulatory sandboxes to safely test AI, and the creation of national AI councils to oversee and monitor the responsible deployment of AI. The initiative aims to mitigate risks such as prejudice and inequality, while ensuring that African economies do not miss out on the benefits that AI can offer.<sup>4</sup> The strategy is scheduled to be adopted at the next AU summit in February 2025.

##### 3.1.1. South Africa

Even though South Africa does not have an AI action plan or strategy, it will be able to use the AU strategy mentioned above to create its national strategy.<sup>5</sup> In any event, existing legal principles could be adapted to deal with this new technology.<sup>6</sup> The stakeholders stress the importance of striking a balance between innovation and guaranteeing respect for ethical principles.

On 30 November 2022, the Department of Communications and Digital Technologies launched the AI Institute of South Africa. This institute aims to generate knowledge and applications that will position South Africa as a competitive player in the global AI space. It could serve as a springboard for defining clear positions on AI.<sup>7</sup> The South African AI Association (SAAIA) was launched in 2023 as an industry body focused on promoting the advancement of responsible AI in South Africa by bringing together practitioners from the commercial, government, academic, start-up and NGO sector.

The National Artificial Intelligence Summit, hosted by the Minister of Communications and Digital Technology on 5 April 2024, launched the process towards developing an AI policy and regulatory framework in South Africa. This summit is an important step towards structuring a regulatory environment that fosters innovation while preserving ethical standards.<sup>8</sup>

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<sup>2</sup> African Union. (2023). *Powering Africa's Digital Future: AU Ministerial Meeting set to ignite Digital Transformation in Africa*, available at <https://au.int/en/pressreleases/20231121/powering-africas-digital-future-au-ministerial-meeting-set-ignite-digital#:~:text=African%20Ministers%20of%20ICT%20and,driving%20Africa%27s%20digital%20agenda%20forward.> (accessed 10 June 2024).

<sup>3</sup> MIT Technology Review. (2024). *Africa's push to regulate AI starts now*, available at <https://www.technologyreview.com/2024/03/15/1089844/africa-artificial-intelligence-regulation-au-policy/> (accessed 10 June 2024).

<sup>4</sup> ECDPM. (2023). *Looking into the crystal ball: Artificial intelligence policy and regulation in Africa*, available at <https://ecdpm.org/work/looking-crystal-ball-artificial-intelligence-policy-regulation-africa> (accessed 10 June 2024).

<sup>5</sup> ECDPM. (2024). *Envisioning Africa's AI governance landscape in 2024 – ECDPM Briefing Note 177*, available at <https://ecdpm.org/application/files/7017/0651/8711/Envisioning-Africas-AI-Governance-Landscape-in-2024-ECDPM-Briefing-Note-177-2024.pdf> (accessed 10 June 2024).

<sup>6</sup> Cliffe Dekker Hofmeyr. (2024). *Regulation of AI in South Africa*, available at <https://www.cliffedekkerhofmeyr.com/news/media/2024/Technology/Regulation-of-AI-in-South-Africa> (accessed 10 June 2024).

<sup>7</sup> ECDPM. (2024). *Envisioning Africa's AI governance landscape in 2024 – ECDPM Briefing Note 177*, available at <https://ecdpm.org/application/files/7017/0651/8711/Envisioning-Africas-AI-Governance-Landscape-in-2024-ECDPM-Briefing-Note-177-2024.pdf> (accessed 10 June 2024).

<sup>8</sup> ITWeb AI Summit 2024 Conference. (2024), available at <https://www.itweb.co.za/event/itweb-ai-summit-2024/> (accessed 10 June 2024).

### 3.1.2. Nigeria

Since August 2023, Nigeria has been conducting a study with experts and professionals to create its national AI strategy.<sup>9</sup> Nigeria is currently investing in education and financial aid to support start-ups, confirming its status as one of Africa's technological pioneers. Nigeria has created a National Centre for AI and Robotics (NCAIR), which plays a key role in the development of AI research and development within the country.<sup>10</sup>

## 3.2. North America

Canada and the United States are actively involved in AI. As a world leader in AI, the United States is a very important player in future regulation. With a vision that differs from that proposed by the EU, the US seeks to create AI regulation with a distinct identity. Canada is likewise a pioneer in AI regulation, and its approach could also influence the rest of the world.

### 3.2.1. Canada

In 2017, Canada became the first country to launch an AI strategy.<sup>11</sup> The strategy is implemented in three national centres spread across the country. The Canadian strategy pursues three goals: commercialisation; standards; and talent and research.<sup>12</sup> Canada has also introduced measures for the responsible use of AI in government.<sup>13</sup>

In 2022, Canada introduced a bill, the Artificial Intelligence and Data Act (AIDA)<sup>14</sup>, which aims to develop a foundation for the responsible use of AI and to ensure that AI systems and applications used in Canada are safe and non-discriminatory.<sup>15</sup> This bill is one of the first in the world to take a horizontal approach. The AIDA is one of three pieces of legislation included in Bill C-27, along with the Consumer Privacy Protection Act and the Personal Information and Data Protection Tribunal Act.<sup>16</sup>

In addition to this bill, Canada has published a voluntary code of conduct for the development and use of generative AI in anticipation of the AIDA.<sup>17</sup> Canada has also published a legally binding Directive on Automated Decision-Making, which imposes a number of requirements on the federal government regarding the use of automated decision-making systems.<sup>18</sup>

Many countries, including Canada, have recently established AI Safety Institutes. In Canada, this institute, established in November 2024, is part of the government's broader strategy to promote the safe and responsible development of AI, which includes the proposed AIDA and the voluntary code of conduct

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<sup>9</sup> Cointelegraph. (2023). *How Nigeria stepped up its AI game in 2023*, available at <https://cointelegraph.com/news/how-nigeria-stepped-up-its-ai-game-in-2023> (accessed 10 June 2024).

<sup>10</sup> Olisa Agbakoba Legal. (2023). *Artificial Intelligence (AI) Regulation in Nigeria: Key Considerations, Recommendations, Legal Framework, and Policy Development for Artificial Intelligence (AI) in Nigeria*, available at [https://oal.law/artificial-intelligence-ai-regulation-in-nigeria-key-considerations-recommendations-legal-framework-and-policy-development-for-artificial-intelligence-ai-in-nigeria/?utm\\_source=Mondaq&utm\\_medium=syndication&utm\\_campaign=LinkedIn-integration&utm\\_source=mondaq&utm\\_medium=syndication&utm\\_term=technology&utm\\_content=articleoriginal&utm\\_campaign=article](https://oal.law/artificial-intelligence-ai-regulation-in-nigeria-key-considerations-recommendations-legal-framework-and-policy-development-for-artificial-intelligence-ai-in-nigeria/?utm_source=Mondaq&utm_medium=syndication&utm_campaign=LinkedIn-integration&utm_source=mondaq&utm_medium=syndication&utm_term=technology&utm_content=articleoriginal&utm_campaign=article) (accessed 10 June 2024).

<sup>11</sup> CIFAR. (2024). *The Pan-Canadian AI Strategy*, available at <https://cifar.ca/ai/> (accessed 10 June 2024).

<sup>12</sup> Canada.ca. (n.d.). *Pan-Canadian Artificial Intelligence Strategy*, available at <https://ised-isde.canada.ca/site/ai-strategy/en> (accessed 10 June 2024).

<sup>13</sup> Canada.ca. (n.d.). *Responsible use of artificial intelligence in government* available at <https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai.html> (accessed 10 June 2024).

<sup>14</sup> Canada.ca. (2024). *Artificial Intelligence and Data Act*, available at <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act> (accessed 10 June 2024).

<sup>15</sup> Canada.ca. (2023). *The Artificial Intelligence and Data Act (AIDA) – Companion document*, available at <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document> (accessed 10 June 2024).

<sup>16</sup> Justice.gc.ca. (2022). *Bill C-27: An Act to enact the Consumer Privacy Protection Act, the Personal Information and Data Protection Tribunal Act and the Artificial Intelligence and Data Act and to make consequential and related amendments to other Acts*, available at [https://www.justice.gc.ca/eng/csj-sjc/pl/charte-charte/c27\\_1.html](https://www.justice.gc.ca/eng/csj-sjc/pl/charte-charte/c27_1.html) (accessed 10 June 2024).

<sup>17</sup> Canada.ca. (2023). *Consultation on the development of a Canadian code of practice for generative artificial intelligence systems*, available at <https://ised-isde.canada.ca/site/ised/en/consultation-development-canadian-code-practice-generative-artificial-intelligence-systems> (accessed 10 June 2024).

<sup>18</sup> Canada.ca. (2023). *Directive on Automated Decision-Making*, available at <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592> (accessed 10 June 2024).

mentioned above.<sup>19</sup> The goal of the institute, named CAISI, is to strengthen Canada's ability to address AI safety risks by positioning the country as a leader in the safe and responsible development and adoption of AI technologies.

a. Formal and material content

The AIDA bill paves the way for a regulatory system that promotes AI innovation. The Canadian government has introduced a risk system based on the concept of 'high-impact systems'. These systems are subject to much more restrictive requirements, especially with regard to damage reduction and transparency.<sup>20</sup> In order to have an interoperable instrument, Canada aimed for the AIDA to be compatible with the EU's Artificial Intelligence Act (AI Act)<sup>21</sup>, with a very similar classification system. With this bill, Canada is presenting an approach based on risk, consumer protection and respect for human rights. Once adopted, the AIDA will be a legally binding law.

b. Public-private application

The AIDA bill applies only to the private sector; the public sector is not covered. The AIDA would only apply to international and interprovincial trade and commerce.

c. Scope

The AIDA bill applies horizontally, targeting different sectors or industries in a uniform way.

d. Current status

The bill is at the committee stage in the House of Commons.<sup>22</sup> After a third reading, it will then go to the Senate and should be finalised before October 2025.<sup>23</sup>

e. Governance

The Minister of Innovation, Science and Industry will be responsible for the administration and enforcement of part of the Act. The Artificial Intelligence and Data Commissioner (AIDC) would be responsible for assisting the minister in discharging their responsibilities.<sup>24</sup>

Companies would be required to put in place appropriate accountability mechanisms to ensure compliance with their obligations. Two types of penalty are envisaged for failure to comply with the regulations: fines of up to CAD 10 to 25 million for offending companies and prison sentences of up to five years less a day and/or discretionary fines for offending individuals.<sup>25</sup>

### 3.2.2. United States

Along with China, the United States is the leader in AI development, not least because it is home to companies such as OpenAI, Microsoft, Google, Meta, etc. With regard to AI regulation, the race is well under way, with a twofold competition taking shape: the first is technical and commercial, the second is regulatory. On that point, the Biden administration – in the absence of congressional action – issued an executive order on AI in October 2023. Given the deadlock between the two political parties in the US Congress, the Biden administration opted for an approach based on voluntary commitments from industry and an executive order.

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<sup>19</sup> Canada.ca (2024). *Canada launches Canadian Artificial Intelligence Safety Institute*, available <https://www.canada.ca/en/innovation-science-economic-development/news/2024/11/canada-launches-canadian-artificial-intelligence-safety-institute.html> (accessed 4 December 2024).

<sup>20</sup> Canada.ca. (2023). *The Artificial Intelligence and Data Act (AIDA) – Companion document*, available at <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document> (accessed 10 June 2024).

<sup>21</sup> European Union. (2024). Regulation (EU) 2021/0106 of the European Parliament and of the Council laying down harmonised rules on artificial intelligence (EU AI Act). Official Journal of the European Union, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52021PC0206> (accessed 10 June 2024).

<sup>22</sup> Parliament of Canada. (n.d.). C-27 (44-1) – *LEGISinfo*, available at <https://www.parl.ca/legisinfo/en/bill/44-1/c-27> (accessed 10 June 2024).

<sup>23</sup> Canada.ca. (2023). *The Artificial Intelligence and Data Act (AIDA) – Companion document*, available at <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document> (accessed 10 June 2024).

<sup>24</sup> Ibid

<sup>25</sup> Langlois Lawyers. (2023). *Legal framework for artificial intelligence: Where do we stand in Canada and Quebec?* available at <https://langlois.ca/en/insights/legal-framework-for-artificial-intelligence-where-do-we-stand-in-canada-and-quebec> (accessed at 10 June 2024).



Paving the way for the executive order issued in October 2023, the White House Office of Science and Technology Policy on 4 October 2022 presented a Blueprint for an AI Bill of Rights.<sup>26</sup> The blueprint contains five key principles for the responsible use of AI.

Along the same lines, the National Institute of Standards and Technology (NIST) published its AI Risk Management Framework on 18 August 2022.<sup>27</sup> This management framework aims to help companies developing or deploying AI systems to assess and manage the associated risks. The framework consists of voluntary, non-binding guidelines and recommendations.

Before issuing its executive order, the Biden administration turned to industry to establish an initial regulatory framework in the form of voluntary commitments. These principles are still valid and applicable. In July 2023, seven of the most influential companies in AI (Amazon, Anthropic, Google, Inflection, Meta, Microsoft and OpenAI) committed to a series of principles focused on safety, security and trust.<sup>28</sup> The companies accept external 'red-teaming' approaches<sup>29</sup> to test the security of their systems and are also committed to developing and deploying their AI systems to meet today's major social challenges.

In October 2023, a few days before the UK AI Safety Summit, the Biden administration issued its Executive Order on Safe, Secure, and Trustworthy Artificial Intelligence, a landmark directive building on the 2022 blueprint and marking a step forward in US regulation. This executive order sets new standards for the safety and security of AI and aims to foster innovation. It brings together the various White House initiatives and unifies the entire federal government in its approach to AI.

The day after the Executive Order was issued, the US AI Safety Institute (US AISI) was founded. The vision of the US AISI is safe AI innovation for prosperity.<sup>30</sup> To achieve, a plan to mitigate AI safety risks was outlined. US AISI's three goals are to: advance the science of AI safety; articulate, demonstrate, and disseminate AI safety practices; and support institutions, communities, and coordination around AI safety. Like the UK institute (see below), the US AISI is turning to a strong commitment to developing the science of measuring and assessing the risks of advanced AI. This scientific approach aims to develop and research best practices and assess risks before legislating. However, the US institute believes that safety is itself a driver of innovation, as it increases consumer confidence in AI technology.

#### a. Formal and material content

The executive order promotes the safe, secure and trustworthy use of AI to help the US government manage AI risks. It mandates all federal agencies to assess and implement policies and initiatives to harness the power of AI for the benefit of citizens and key government priorities.

Executive orders are official documents by which the president of the United States administers the operations of the federal government. Although they are legally binding, they differ from laws in that they do not arise from the legislative process. By bypassing congressional approval, executive orders remain vulnerable to changes of administration, because what one president puts in place, the next can just as easily repeal. This would mean that incoming president Donald Trump is free to overturn this presidential decree, which he intends to do, according to information from the Republican Party.<sup>31</sup>

An analysis of this executive order shows that the Biden administration has chosen to be exhaustive in its approach. Divided into 13 sections, the executive order covers most subjects, with the notable exception of intellectual property: 1. Purpose, 2. Policy and Principles, 3. Definitions, 4. Ensuring the

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<sup>26</sup> OSTP | The White House. (n.d.). *Blueprint for an AI Bill of Rights*, available at <https://www.whitehouse.gov/ostp/ai-bill-of-rights/> (accessed 10 June 2024).

<sup>27</sup> NIST. (n.d.). *AI Risk Management Framework*, available at <https://www.nist.gov/itl/ai-risk-management-framework> (accessed 10 June 2024).

<sup>28</sup> ANSI. (2023). *Leading AI Companies Sign U.S. Government Commitment on Safety, Security, and Trust in AI Development*, available at <https://www.ansi.org/standards-news/all-news/2023/07/7-21-23-leading-ai-companies-sign-us-government-commitment> (accessed 10 June 2024).

<sup>29</sup> AI red-teaming creates simulated attack scenarios targeting AI applications in order to identify vulnerabilities and develop countermeasures. This strategy is essential to protect AI models against attacks and operational problems.

<sup>30</sup> NIST (2023). *US Artificial Intelligence Safety Institute*, available at <https://www.nist.gov/aisi> (accessed 4 December 2024).

<sup>31</sup> The American Presidency Project, *2024 GOP Platform Make America Great Again*, available at <https://www.presidency.ucsb.edu/documents/2024-republican-party-platform> (accessed 2 December 2024).

Safety and Security of AI Technology, 5. Promoting Innovation and Competition, 6. Supporting Workers, 7. Advancing Equity and Civil Rights, 8. Protecting Consumers, Patients, Passengers, and Students, 9. Protecting Privacy, 10. Advancing Federal Government Use of AI, 11. Strengthening American Leadership Abroad, 12. Implementation, 13. General Provisions. With respect to the definition of AI, the US version differs slightly from that established by other international bodies, notably the OECD<sup>32</sup>, in that they go further in defining what an AI model is.<sup>33</sup>

b. Public-private application

The executive order applies exclusively to the federal government. It does not create any direct obligations for the private sector. Nevertheless, the regulations set out in the October 2023 executive order require all federal agencies to procure, use and implement artificial intelligence systems in accordance with very specific criteria. De facto and by force of public procurement contracts, this means that the federal government's criteria are likewise adopted by some of the American private sector.

c. Scope

The executive order provides for horizontal application, uniformly across different sectors or industries.

d. Current status

The executive order is currently being applied in the United States. However, it is important to note that there are different obligations that come into effect at different points in time. Section 4.1, for example, specifies that the National Institute of Standards and Technology (NIST) had to establish guidelines and best practices, which were published in July 2024.<sup>34</sup>

e. Governance

To coordinate the timely implementation of federal AI policies, including those outlined in the executive order, the Biden administration created the White House Artificial Intelligence Council, comprised of representatives from various agencies.<sup>35</sup> The NIST will play a fundamental role in establishing guidelines and best practices for 'developing and deploying safe, secure and trustworthy AI systems'.

The executive order contains no penalty provisions.

### 3.3. South America

South America considers the arrival of AI to be a great opportunity, but one that will take time to regulate. Only a few countries in South America have AI-related regulations, and most initiatives are largely inspired by the EU's AI Act and US standards. This may illustrate South America's tendency to align itself with these two major poles of AI regulation.

#### 3.3.1. Brazil

Brazil stands out in terms of AI regulation. Like other countries examined in this analysis, Brazil has a national AI strategy, adopted by the Ministry of Science, Technology and Innovation. Between 2019 and 2021, Brazil introduced three AI bills aimed at striking a balance between minimising harm and promoting innovation. However, none of the three bills made it through Congress.<sup>36</sup>

<sup>32</sup> OECD. (n.d.). *Artificial intelligence*, available at <https://www.oecd.org/en/topics/artificial-intelligence.html> (accessed 10 June 2024).

<sup>33</sup> Garrigues Digital. (2024). *Regulating AI in the EU, US and OECD: the difficult balance between security and driving innovation*, available at [https://www.garrigues.com/en\\_GB/garrigues-digital/regulating-ai-eu-us-and-oecd-difficult-balance-between-security-and-driving](https://www.garrigues.com/en_GB/garrigues-digital/regulating-ai-eu-us-and-oecd-difficult-balance-between-security-and-driving) (accessed 10 June 2024).

<sup>34</sup> The White House. (2023). *Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*, available at <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/10/30/executive-order-on-the-safe-secure-and-trustworthy-development-and-use-of-artificial-intelligence/> (accessed 10 June 2024).

<sup>35</sup> United States Government. (2024). *Highlights of the 2023 Executive Order on Artificial Intelligence for Congress*, available at <https://crsreports.congress.gov/product/pdf/R/R47843#:~:text=Safety%20and%20Security,The%20E.O.,security%20and%20critical%20infrastructure%20risk> (accessed 10 June 2024).

<sup>36</sup> Holistic AI. (2023). *How is Brazil Leading South America's AI Legislation Efforts?* Available at <https://www.holisticai.com/blog/brazil-ai-legislation-proposals> (accessed 10 June 2024).

In 2023, the President of the Senate, Rodrigo Pacheco, published Bill 2338/2023.<sup>37</sup> The bill contains many similarities with the EU's AI Act, adopting a risk-based regulatory approach. It centres respect for human rights and provides for a mechanism of administrative sanctions.

a. Formal and material content

Presented on 3 May 2023, Bill 2338/2023 aims to establish general national standards for the development, implementation and responsible use of AI systems in Brazil. It aims to protect fundamental rights and guarantee the implementation of safe and reliable AI systems, in the interests of human beings, the democratic system and scientific and technological development.<sup>38</sup> The goal is to lay down binding rules that pursue a human-centric vision. In the same way as the EU's AI Act, the bill seeks to regulate the market by conducting risk assessments for the various products.<sup>39</sup> Certain systems that are considered dangerous are to be banned, as they are in the EU.

b. Public-private application

Bill 2338/2023 is intended to apply to both the public and private sectors.

c. Scope

Bill 2338/2023 provides for horizontal application, uniformly targeting different sectors or industries.

d. Current status

Bill 2338/2023 was approved by the Brazilian Senate on 10 December 2024. The current version of the bill must still be analysed by the House of Representatives and approved by the President before it can enter into force.<sup>40</sup>

e. Governance

Bill 2338/2023 stipulates that the competent authority – a body or entity of the federal public administration – must ensure compliance with the defined rules and impose administrative penalties. The bill does not describe in more detail what this body or entity is, or whether it is an existing ministry or a new body to be created.

Administrative fines of up to BRL 50,000,000 or 2% of turnover are provided for, as well as suspensions or bans on the offender's activities.

### 3.4. Asia

Thanks to substantial government support and a focus on research and development, Asian countries are positioning themselves as key players in the global AI race. This is why a large number of Asian countries feature in this analysis. China stands out for its approach, which is neither in line with that of the United States nor that of the EU, and has already regulated certain specific aspects of AI on a sectoral basis. The ASEAN<sup>41</sup> countries have opted for a more business-friendly and open approach than the EU.

#### 3.4.1. China

Along with the US and the EU, China is the other major technology leader in AI. China created an AI framework already in 2017, but with a sectoral approach. This regulatory framework differs from the EU's AI Act and the US approach, which tend towards horizontal regulation.

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<sup>37</sup> Senado Federal. (2023). PL 2338/2023, available at <https://www25.senado.leg.br/web/atividade/materias/-/materia/157233> (accessed 10 June 2024).

<sup>38</sup> Mundie Advogados. (2023). *Highlights*, available at <http://mundieadvogados.com.br/Highlights.en.807> (accessed 10 June 2024).

<sup>39</sup> Ibid.

<sup>40</sup> Mattos Filho (2024). *Regulatory framework for artificial intelligence passes in Brazil's Senate*, available at <https://www.mattosfilho.com.br/en/unico/framework-artificial-intelligence-senate/> (accessed 10 December 2024).

<sup>41</sup> The Association of Southeast Asian Nations (ASEAN) comprises 10 member states. Created by Indonesia, Malaysia, Singapore, Thailand and the Philippines in 1967, it was joined by Brunei (1984), Vietnam (1995), Laos and Burma (1997) and finally Cambodia (1999) ([Member States - ASEAN Main Portal](#)).

In 2017, China's State Council first drew up its New Generation Artificial Intelligence Development Plan.<sup>42</sup> The plan includes initiatives and objectives in the areas of research and development, industrialisation, talent development, education and skills acquisition, standardisation and regulation, ethical standards and safety.

A few years later, in 2021, ethical guidelines on AI were published.<sup>43</sup> These guidelines aim to integrate ethics into the entire AI life cycle, in particular by promoting equity, justice, harmony and safety.

Since 2022, China has adopted three separate AI regulations. They focus on deepfakes, generative AI, and algorithmic recommendation systems for news and social media content. The three instruments are analysed separately here.

### 1. Regulation on recommendation algorithms

The regulation on recommendation algorithms ('Algorithm Provisions') contains provisions on the management of algorithmic recommendations in internet information services.<sup>44</sup>

#### a. Formal and material content

The main objective of the regulation is to address the way in which algorithms affect the promotion and distribution of online content. Providers must respect users' rights, in particular by protecting minors and allowing users to select or remove tags relating to their personal characteristics. This regulation is legally binding. The aim is to regulate the operation of certain platforms.<sup>45</sup>

#### b. Public-private application

The regulation applies to both the public and private sectors.

#### c. Scope

The scope of this instrument is not very clear. In effect, this regulation provides for sectoral application, given that it targets certain specific algorithmic applications.<sup>46</sup>

#### d. Current status

The regulation has been in force since 1 March 2022.

#### e. Governance

The Cyberspace Administration of China – in collaboration with the Ministry of Industry and Information Technology, the Ministry of Public Security and the State Administration for Market Regulation – is responsible for applying these provisions.<sup>47</sup>

Administrative fines of between RMB 10,000 and RMB 100,000 (equivalent to between USD 1,570 and USD 15,705) may be imposed for non-compliance.<sup>48</sup>

### 2. Regulation on synthetically generated content

The second instrument is the 'Deep Synthesis Regulation', which came into force in January 2023.

#### a. Formal and material content

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<sup>42</sup> Stanford.edu. (n.d.). *Full Translation: China's 'New Generation Artificial Intelligence Development Plan' (2017)*, available at <https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/> (accessed 10 June 2024).

<sup>43</sup> OECD.AI. (2017). *ETHICAL NORMS FOR NEW GENERATION AI Policy*, available at <https://oecd.ai/en/dashboards/policy-initiatives/http:%2F%2Faiipo.oecd.org%2F2021-data-policy/initiatives-27190> (accessed 10 June 2024).

<sup>44</sup> China Law Translate. (2022). *Provisions on the Management of Algorithmic Recommendations in Internet Information Services*, available at <https://www.chinalawtranslate.com/en/algorithms/> (accessed 10 June 2024).

<sup>45</sup> Holistic AI. (2024). *Making Sense of China's AI Regulations*, available at <https://www.holisticai.com/blog/china-ai-regulation> (accessed 10 June 2024).

<sup>46</sup> Carnegie Endowment for International Peace. (2023). *Lessons From the World's Two Experiments in AI Governance*, available at <https://carnegieendowment.org/posts/2023/02/lessons-from-the-worlds-two-experiments-in-ai-governance?lang=en> (accessible 10 June 2024).

<sup>47</sup> China Law Translate. (2022). *Provisions on the Management of Algorithmic Recommendations in Internet Information Services*, available at <https://www.chinalawtranslate.com/en/algorithms/> (accessed 10 June 2024).

<sup>48</sup> Taylor Wessing. (2023). *AI Regulation Around the World*, available at <https://www.taylorwessing.com/en/interface/2023/ai---are-we-getting-the-balance-between-regulation-and-innovation-right/ai-regulation-around-the-world> (accessed 10 June 2024).

The Deep Synthesis Regulation requires visible labels to be placed on synthetically generated content. Its provisions focus on four main pillars: data security and protection of private information; transparency; content management; and technical security.<sup>49</sup> They govern the entire life cycle of deepfakes, from creation to distribution.<sup>50</sup> This regulation is legally binding.

b. Public-private application

This regulation applies to both the public and private sectors.

c. Scope

This regulation provides for sector-specific application, aimed at providers and users of this technology.

d. Current status

This regulation came into force on 10 January 2023.

e. Governance

The regulation is being implemented jointly by three central government regulators – the Cyberspace Administration of China (CAC), the Ministry of Industry and Information Technology (MIIT) and the Ministry of Public Security (MPS).<sup>51</sup>

The maximum penalties are the same as for the Algorithm Provisions.<sup>52</sup>

3. Interim measures for the management of generative artificial intelligence services

Thirdly, 'Interim Measures for the Management of Generative Artificial Intelligence Services' were published in May 2023.<sup>53</sup>

a. Formal and material content

The interim measures are aimed at providers of generative AI and are based on five principles: respect for Chinese socialist values; prohibition of discrimination; prohibition of unfair competition; respect for intellectual property rights; and respect for the rights of others. Measures must be taken to improve transparency, accuracy and reliability. There are exemptions to these measures, particularly for research and development activities. The measures are legally binding.

b. Public-private application

The interim measures apply to both the public and private sectors.

c. Scope

The scope of this instrument is not very clear. In effect, the regulation provides for sectoral application.

d. Current status

The interim measures came into force on 15 August 2023.

e. Governance

A large number of commissions and ministries are working together to implement these measures. In particular, these include the Cyberspace Administration, the National Development and Reform Commission, the Ministry of Science and Technology and the Ministry of Industry and Information Technology.

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<sup>49</sup> Holistic AI. (2024). *Making Sense of China's AI Regulations*, available at <https://www.holisticai.com/blog/china-ai-regulation> (accessed 10 June 2024).

<sup>50</sup> Ibid.

<sup>51</sup> Library of Congress. (2023). *China: Provisions on Deep Synthesis Technology Enter into Effect*, available at <https://www.loc.gov/item/global-legal-monitor/2023-04-25/china-provisions-on-deep-synthesis-technology-enter-into-effect/> (accessed 10 June 2024).

<sup>52</sup> Taylor Wessing. (2023). *AI Regulation Around the World*, available at <https://www.taylorwessing.com/en/interface/2023/ai---are-we-getting-the-balance-between-regulation-and-innovation-right/ai-regulation-around-the-world> (accessed 10 June 2024).

<sup>53</sup> China Law Translate. (2023). *Interim Measures for the Management of Generative Artificial Intelligence Services*, available at <https://www.chinalawtranslate.com/en/generative-ai-interim/> (accessed 10 June 2024).

Art. 21 of the measures provides for administrative penalties as well as criminal penalties.<sup>54</sup>

In addition to the three instruments analysed above, China is currently studying the possibility of creating a comprehensive national AI law that could be drafted and implemented in the coming years.<sup>55</sup> China appears to have a head start, so it will be interesting to see how other countries can build on this precedent, how East-West relations in AI will continue to converge and who will set the standard for AI in the East.

### 3.4.2. South Korea

In 2019, South Korea launched numerous AI and technology policy initiatives as part of its national AI strategy. Most of these initiatives were developed by national ministries.<sup>56</sup> The national strategy includes an AI research and development policy and seeks to position South Korea as a world leader in this technology. South Korea intends to take advantage of its high level of education, widespread acceptance of new technologies and its infrastructure to implement these initiatives.

South Korea has also positioned itself internationally, hosting the AI Seoul Summit in May 2024, which followed the Bletchley Park Summit in 2023.<sup>57</sup> The Summit announced the creation of a new agreement committing nations to work together to launch an AI Safety Institute International Network to accelerate progress in AI safety science, which met for the first time in November 2024 in San Francisco, USA.<sup>58</sup> Experts from 9 countries (US, UK, Japan, Singapore, South Korea, Canada, France, Kenya and Australia) and the EU attended to discuss international cooperation on AI security science through a network of institutes.<sup>59</sup> South Korea, meanwhile, established its own national AI security institute in November 2024.

On 28 February 2023, the Bill on Artificial Intelligence Liability (2120353) was submitted to the National Assembly of the Republic of Korea. This bill aims to regulate AI comprehensively by establishing basic principles for the development and use of these systems. It describes the responsibilities of the state and of commercial operators who develop and use this technology, and it establishes the rights of users and regulates high-risk AI systems.

#### a. Formal and material content

The bill aims to regulate AI comprehensively. It favours the principle of 'allow first, regulate later', but provides no obligations or sanctions for suppliers to control the risks of AI, nor any recourse for those who suffer harm as a result of AI. The act would be legally binding.

#### b. Public-private application

The bill is intended to apply in both the public and private sectors.

#### c. Scope

The bill is a horizontal regulation, applying uniformly to different sectors or industries.

#### d. Current status

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<sup>54</sup> Ibid.

<sup>55</sup> Carnegie Endowment for International Peace. (2024). *Tracing the Roots of China's AI Regulations*, available at <https://carnegieendowment.org/2024/02/27/tracing-roots-of-china-s-ai-regulations-pub-91815#:~:text=China%20is%20regulating%20AI%2C%20and,transformative%20technologies%20of%20our%20time> (accessed 10 June 2024).

<sup>56</sup> Association for Progressive Communications. (2024). *The risks of artificial intelligence and the response of Korean civil society*, available at <https://www.apc.org/en/blog/risks-artificial-intelligence-and-response-korean-civil-society> (accessed 10 June 2024).

<sup>57</sup> UK Government. (2024). *AI Seoul Summit 2024*, available at <https://www.gov.uk/government/topical-events/ai-seoul-summit-2024> (accessed 10 June 2024).

<sup>58</sup> UK Government (2023), *Introducing the AI Safety Institute*, available at <https://www.gov.uk/government/publications/ai-safety-institute-overview/introducing-the-ai-safety-institute> (accessed 4 December 2024).

<sup>59</sup> CSIS (2024), *The AI Safety Institute International Network: Next Steps and Recommendations*, available at <https://www.csis.org/analysis/ai-safety-institute-international-network-next-steps-and-recommendations> (accessed 4 December 2024).



The act has been under deliberation since February 2023. Some civil society groups are strongly opposed to the bill.<sup>60</sup> They are not opposed to regulation as such, but believe that this initiative is not the most appropriate approach. Their main criticism concerns the lack of an appropriate regulatory framework, which is deliberately side-lined in favour of innovation.<sup>61</sup>

South Korean elections took place in April 2024 and the new National Assembly was constituted in May 2024.<sup>62</sup> The bill is still under discussion.

e. Governance

The Ministry of Science and ICT is the competent ministry.

The bill contains no penalty provisions.

### 3.4.3. United Arab Emirates

The UAE aims to establish itself as a hub for AI research, collaboration, innovation and education, in line with its national AI strategy. The national strategy<sup>63</sup>, published in 2019, has the ambition – like many other countries – to make the UAE one of the world leaders in AI.<sup>64</sup> The strategy aims to take action in various sectors, including education, the economy, energy and tourism. The strategy is structured around eight strategic objectives: build a reputation as an AI destination; increase the UAE competitive assets; develop a fertile ecosystem for AI; embrace AI in customer services to improve lives and government; attract and train talent for future jobs; build world-leading research capability to work with target industries; provide the data and supporting infrastructure essential to become a test bed for AI; and finally, ensure strong governance and effective regulation.<sup>65</sup>

In 2017, the UAE became the first country to create a Ministry for Artificial Intelligence. The Artificial Intelligence, Digital Economy and Remote Work Applications Office is responsible for achieving the goals of the national strategy.<sup>66</sup>

The United Arab Emirates has no AI-specific regulation.

### 3.4.4. Israel

In December 2023, Israel launched its first AI regulation and ethics policy. This policy is the result of collaboration between the Ministry of Innovation, Science and Technology and the Ministry of Justice. Israel stresses the need to address and mitigate the potential risks caused by AI, while establishing a framework to encourage innovation.<sup>67</sup> However, Israel does not see the need for binding regulation. Israel believes that soft law frameworks are better suited to the creation of dynamic structures aimed at harmonising regulations between industries and activities.<sup>68</sup>

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<sup>60</sup> Carnegie Endowment for International Peace. (2024). Korea's Path to Digital Leadership. (n.d.), available at <https://carnegieendowment.org/2024/02/28/digital-policy-report-card-for-south-korea-pub-91833> (accessed 10 June 2024).

<sup>61</sup> Association for Progressive Communications. (2024). *The risks of artificial intelligence and the response of Korean civil society*, available at <https://www.apc.org/en/blog/risks-artificial-intelligence-and-response-korean-civil-society> (accessed 10 June 2024).

<sup>62</sup> White & Case. (2024), *AI Watch: global regulatory tracker – South Korea*, available at <https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-south-korea> (accessed 4 December 2024).

<sup>63</sup> UAE Artificial Intelligence Office. (2021). *UAE National Strategy for Artificial Intelligence 2031*, available at <https://ai.gov.ae/wp-content/uploads/2021/07/UAE-National-Strategy-for-Artificial-Intelligence-2031.pdf> (accessed 10 June 2024).

<sup>64</sup> Ibid.

<sup>65</sup> Ibid.

<sup>66</sup> UAE Artificial Intelligence Office. (2022). *About | Artificial Intelligence Office, UAE*, available at [https://ai.gov.ae/about\\_us/](https://ai.gov.ae/about_us/) (accessed 10 June 2024).

<sup>67</sup> Ministry of Innovation, Science and Technology. (2023). *Israel's Policy on Artificial Intelligence Regulation and Ethics*, available at [https://www.gov.il/en/pages/ai\\_2023](https://www.gov.il/en/pages/ai_2023) (accessed 10 June 2024).

<sup>68</sup> Ibid.

Israel's national policy is based on the aim of harmonising regulations to make it easier to achieve the defined objectives. It sets up a three-tier structure: regulators; a knowledge centre; and a steering committee that develops strategies.

The AI policy recommends empowering sector-specific regulators, promoting international interoperability, adopting a risk-based approach, encouraging incremental development, using soft regulation and promoting multistakeholder cooperation.<sup>69</sup> The policy recommends the creation of an AI policy coordination centre in collaboration with the Office of Legal Counsel and Legislative Affairs at the Ministry of Justice.<sup>70</sup>

### 3.4.5. Japan

Japan is a global hub for AI research, with academic institutions and the private sector actively contributing to progress in the field. Japan tends towards flexible rules in its AI regulation.

In 2022, Japan published a national AI strategy, updating its first version published in 2019.<sup>71</sup> Under the strategy, the Japanese government provides non-binding guidance and relies on the voluntary efforts of the private sector to regulate itself.

Japan has decided to develop AI guidelines applicable to businesses.<sup>72</sup> Published in draft form by the Ministry of Internal Affairs and Communications and the Ministry of Economy, Trade and Industry in December 2023, the guidelines were subsequently opened to public consultation.<sup>73</sup> This draft aims to provide AI developers, providers and business users with guiding principles for AI governance to promote the safe and secure use of AI technology.<sup>74</sup> The basic principles set out in the document include protection of the population, development of infrastructures and communications, economic security, interoperability and more.<sup>75</sup>

Japan also launched the Hiroshima AI Process during its G7 presidency in 2023.<sup>76</sup> The Hiroshima Process International Guiding Principles aim to promote safe, secure and trustworthy AI worldwide and provide guidance for organisations developing and using the most advanced AI systems. This non-exhaustive list of guiding principles has been elaborated as a living document to build on the OECD AI Principles.<sup>77</sup> The principles should apply to all AI actors, when and as applicable to cover the design, development, deployment and use of AI systems.

Like many other countries, Japan has set up a national AI safety institute. The Japan AISI was established in February 2024, with the aim of supporting the development of AI risk assessment software, international cooperation and coordination, and cooperation with the private sector.<sup>78</sup>

### 3.4.6. Singapore

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<sup>69</sup> Ibid.

<sup>70</sup> Ibid.

<sup>71</sup> Government of Japan, Cabinet Office. (2022). *AI Strategy 2022*, available at <https://www8.cao.go.jp/cstp/ai/aistrategy2022en.pdf> (accessed 10 June 2024).

<sup>72</sup> DataGuidance. (2024). *Japan: MIC and METI request public comments on draft AI business guidelines*, available at <https://www.dataguidance.com/news/japan-mic-and-meti-request-public-comments-draft-ai> (accessed 10 June 2024).

<sup>73</sup> Government of Japan, Ministry of Economy, Trade and Industry. (2024). *Outline of the draft "AI Guidelines for Business"*, available at [https://www.meti.go.jp/shingikai/mono\\_info\\_service/ai\\_shakai\\_jisso/pdf/20240119\\_6.pdf](https://www.meti.go.jp/shingikai/mono_info_service/ai_shakai_jisso/pdf/20240119_6.pdf) (accessed 10 June 2024).

<sup>74</sup> DataGuidance. (2024). *Japan: MIC and METI request public comments on draft AI business guidelines*, available at <https://www.dataguidance.com/news/japan-mic-and-meti-request-public-comments-draft-ai> (accessed 10 June 2024).

<sup>75</sup> Government of Japan, Cabinet Office. (2022). *AI Strategy 2022*, available at <https://www8.cao.go.jp/cstp/ai/aistrategy2022en.pdf> (accessed 10 June 2024).

<sup>76</sup> Government of Japan, Ministry of Internal Affairs and Communications (2023). *Hiroshima AI Process*, available at <https://www.soumu.go.jp/hiroshimaaiprocess/en/index.html> (accessed 10 June 2024).

<sup>77</sup> OECD. (n.d.). *AI Principles Overview*, available at <https://oecd.ai/en/ai-principles> (accessed 10 June 2024).

<sup>78</sup> AISI Japan AI Safety Institute (2024), *Overview*, available at <https://aisi.go.jp/> (accessed 4 December 2024).



Singapore does not have specific AI regulations but, as of late 2019, the country has a national AI strategy.<sup>79</sup> In addition to the use of chatbots, five national projects are highlighted in transport and logistics; spatial development and Smart Cities; healthcare; education; and safety and security. The strategy was updated in December 2023 with version 2.0.<sup>80</sup> In this new version, 15 actions are highlighted in different areas such as research, infrastructure and education.

These two strategies published in 2019 and 2023 were developed and overseen by the Smart Nation and Digital Government group<sup>81</sup>, which is part of the Prime Minister's Office and administered by the Ministry of Digital Development and Information.

Singapore tends to take a sector-specific approach to regulating AI governance. The regulatory agencies that have taken action to date have all adopted non-binding approaches, preferring to publish guidelines and recommendations. This can be seen in the field of finance, where the Monetary Authority of Singapore has adopted principles for the responsible use of AI.<sup>82</sup>

In 2019, Singapore released its first edition of the Model AI Governance Framework at the World Economic Forum in Davos. This framework developed by the Information Media Development Authority aims to provide private sector organisations with readily applicable guidance on key ethical and governance issues when deploying AI solutions.

Although Singapore does not have any specific binding AI regulations, there are many relevant and applicable laws governing various elements of the AI lifecycle, such as data protection and online safety.

On 22 May 2024, Singapore designated the Digital Trust Centre as its AI Safety Institute, which brings together Singapore's research ecosystem and collaborates internationally with other institutes to advance AI safety science.<sup>83</sup>

### 3.4.7. Taiwan (Chinese Taipei)

Taiwan, already a giant in microchip production, is emerging as a potential AI powerhouse.

Taiwan's AI action plan launched in 2018.<sup>84</sup> It aims to make Taiwan one of the leading AI nations by developing AI talent, promoting Taiwan's lead role in AI, building Taiwan into an AI innovation hub, liberalising laws and opening testing grounds, and transforming industry with AI in both the public and private sectors.

In June 2023, Taiwan announced that it was working on a horizontal AI bill, the "Basic Act on AI".<sup>85</sup> The bill was presented in June 2024 by the National Science and Technology Council, in a preliminary version. The law is expected to cover the legal definition of AI, privacy protection, data management, risk control and ethical principles related to AI.

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<sup>79</sup> OECD. (n.d.). *NATIONAL AI STRATEGY Policy*, available at <https://oecd.ai/en/dashboards/policy-initiatives/http%2F%2Faipo.oecd.org%2F2021-data-policyInitiatives-26499> (accessed 10 June 2024).

<sup>80</sup> Government of Singapore. (2023). *National AI Strategy*, available at <https://file.go.gov.sg/nais2023.pdf> (accessed 10 June 2024).

<sup>81</sup> International Association of Privacy Professionals. (2024). *Global AI governance: Singapore*, available at <https://iapp.org/resources/article/global-ai-governance-singapore/> (accessed at 10 June 2024).

<sup>82</sup> Monetary Authority of Singapore. (2020). *FEAT Principles Final.pdf*, available at <https://www.mas.gov.sg/~media/MAS/News%20and%20Publications/Monographs%20and%20Information%20Papers/FEAT%20Principles%20Final.pdf> (accessed 10 June 2024).

<sup>83</sup> Infocomm Media Development Authority (2024). *Digital Trust Centre designated as Singapore's AI Safety Institute*, available at <https://www.imda.gov.sg/resources/press-releases-factsheets-and-speeches/factsheets/2024/digital-trust-centre> (accessed 4 December 2024).

<sup>84</sup> Government of Taiwan, National Science and Technology Council. (2022). *2022 Taiwan AI-Readiness Assessment Report*, available at <https://digi.nstc.gov.tw/File/5AF024B4C7281A84/e761bee6-a38c-4d5b-8481-fc36b83b25d8?A=C> (accessed 10 June 2024).

<sup>85</sup> K&L gates. (2024) *Whitecase, Taiwan's National Science and Technology Council Has Published the Draft Bill of the Basic Act on Artificial Intelligence for Public Consultation*, available at <https://www.klgates.com/Taiwans-National-Science-and-Technology-Council-Has-Published-The-Draft-Bill-Of-The-Basic-Act-On-Artificial-Intelligence-For-Public-Consultation-8-1-2024> (accessed 4 December 2024).

For now, this means no dedicated AI regulation exists in Taiwan; the guidelines laid down by the relevant ministries/institutions are applicable.<sup>86</sup>

### 3.5. Europe

The analysis of the EU AI Act is part of the baseline legal analysis that will be published in December 2024, at the same time as this country analysis. In the present analysis, the countries of continental Europe – EU members and others – are analysed individually, presenting their national approach to AI. It should nevertheless be noted that, as an EU regulation, the AI Act will apply directly to EU Member States from 1 August 2024.

With this supranational instrument, Member States are constrained in their ability to regulate AI differently at national level.<sup>87</sup> Nevertheless, certain powers are still left to the Member States. Member States have a margin for regulatory intervention, particularly with regard to the use of AI for military purposes and adapting the AI regime to national contexts. The penalties regime is reserved exclusively to the Member States, which have the power to define penalties, subject to conditions enumerated in the AI Act.<sup>88</sup> Member States may also decide not to subject public authorities and bodies to administrative fines.

With the AI Act came the creation of the AI Office, which is the centre of expertise for AI in the EU and plays a key role in the implementation of the AI Act, in particular for general-purpose AI, in promoting the development and use of trustworthy AI and in international cooperation.<sup>89</sup> The new office includes a dedicated AI Safety Unit, which focuses on identifying systemic risks of high-performance general-purpose models, possible mitigation measures, and evaluation and testing approaches. This specialised unit is considered the EU's AI safety institute, with a mandate similar to the US and UK institutes.

This analysis of European countries was chosen in part to take into account certain neighbouring countries of Switzerland.

#### 3.5.1. Austria

The Austrian AI strategy, entitled 'Artificial Intelligence Mission AT 2023 (AIM AT 2030)', was adopted in 2021 and lays the foundations for the strategy up to 2030.<sup>90</sup> It was developed by more than 160 experts from science, industry, civil society and public administration and is based on the EU strategy. The strategy aims to be agile, open to change and constantly evolving.<sup>91</sup> AIM AT 230 focuses on three goals: widespread use of AI oriented towards the common good and carried out responsibly; positioning Austria as a location for research and innovation; and ensuring the competitiveness of Austria as a technology and business location.<sup>92</sup>

#### 3.5.2. Italy

Published in August 2024, shortly after the publication of the EU's AI Act, Italy's AI strategy, named 'Strategia Italiana per l'Intelligenza Artificiale 2024-2026', sets out a strategic plan to guide the development of AI in a responsible and inclusive manner.<sup>93</sup> The strategy underlines the government's commitment to establishing a framework conducive to the development of AI in a safe, ethical and

<sup>86</sup> Lee and Li, Attorneys-at-Law. (2024). *Artificial Intelligence and Copyright Laws: A Comprehensive View on Worldwide Legislation of Artificial Intelligence-related Drafts in Response to Copyright Infringement*, available at <https://www.leeandli.com/EN/Newsletters/7219.htm> (accessed 10 June 2024).

<sup>87</sup> Anzini. Eipa. (2021). *The Artificial Intelligence Act Proposal and its Implications for Member States*, available at <https://www.eipa.eu/publications/briefing/the-artificial-intelligence-act-proposal-and-its-implications-for-member-states/> (accessed 10 June 2024).

<sup>88</sup> In accordance with Art. 71 of the AI Act.

<sup>89</sup> European Commission (2024). *Commission establishes AI Office to strengthen EU leadership in safe and trustworthy Artificial Intelligence*, available at [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_24\\_2982](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_2982) (accessed 4 December 2024).

<sup>90</sup> Digital Austria, *Artificial Intelligence Mission Austria 2030*, available at <https://www.digitalaustria.gv.at/eng/strategy/strategy-AI-AIM-AT-2030.html> (accessed 4 December 2024).

<sup>91</sup> AIM AT 2030, *Artificial Intelligence Mission Austria 2030*, available at <https://www.ki-strategie.at/> (accessed 4 December 2024).

<sup>92</sup> Digital Austria, *Artificial Intelligence Mission Austria 2030*, available at <https://www.digitalaustria.gv.at/eng/strategy/strategy-AI-AIM-AT-2030.html> (accessed 4 December 2024).

<sup>93</sup> Agenzia per l'Italia Digitale, *The Italian Strategy for Artificial Intelligence 2024-2026*, available at <https://www.agid.gov.it/en/agenzia/stampa-e-comunicazione/notizie/2024/07/22/italian-strategy-artificial-intelligence-2024-2026> (accessed 4 December 2024).

inclusive manner, maximising its benefits while minimising negative impacts. It addresses the global context and Italy's strategic position, while proposing measures organised around four main areas: research, public administration, the private sector, and education.

### 3.5.3. Germany

The German federal government published an AI strategy in 2018, which was followed in 2023 by a national AI action plan<sup>94</sup> drawn up by the Federal Ministry of Education and Research (BMBF). In its action plan, the ministry defined 12 areas for action, including strengthening the entire AI value chain at national and European level, with an emphasis on links with education, science and research. The action plan emphasises the importance of collaboration with the EU to address developments in this technology.<sup>95</sup> The strategy aims to highlight areas where urgent action is needed, and also underscores the need for clear rules on AI, particularly in education.

In January 2024 the Federal Ministry for Digital and Transport published its Strategy for International Digital Policy of the Federal Government.<sup>96</sup> This strategy is the product of the Digital Strategy Germany published in 2022<sup>97</sup> and is based on a broad consultation process with representatives of civil society, research and business. This strategy does not indicate a strong intention to take concrete measures, however, but rather to establish lines of action.

### 3.5.4. France

As part of the France 2030 plan, which aims to accelerate the transformation of key sectors of the economy through innovation<sup>98</sup>, the French government launched the National Strategy for AI (SNIA) in 2018.<sup>99</sup> This strategy has four components: the announcement of a national AI programme; an open data policy; a regulatory framework; and the development of ethical rules to ensure that the use and development of AI are transparent, explainable and non-discriminatory. Since 2018, the strategy has been coordinated by a national coordinator mandated to implement it through nine ministries and other public bodies.<sup>100</sup>

As of 2024, France is in the second phase of the strategy, which focuses on disseminating AI technologies throughout the economy and supporting development and innovation in priority areas. This new phase of the SNIA focuses primarily on training and attracting talent.<sup>101</sup> The strategy is steered by the national coordinator for artificial intelligence, and will build on the work of various stakeholders.<sup>102</sup>

Against this backdrop, the French Artificial Intelligence Commission put forward 25 recommendations to position France as a world leader in AI. The recommendations stress the need for increased funding from the French state and the European Union. In February 2025 France will host the next AI Action Summit in Paris.<sup>103</sup> This Summit will welcome heads of state and government, leaders of international organisations, small and large businesses, representatives of academia, researchers, non-governmental

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<sup>94</sup> Government of Germany, KI Strategie. (n.d.). *Home - KI Strategie*, available at <https://www.ki-strategie-deutschland.de/> (accessed 10 June 2024).

<sup>95</sup> Digital Watch Observatory. (2023). *Germany's ambitious AI action plan aims to challenge US and China dominance*, available at <https://dig.watch/updates/germanys-ambitious-ai-action-plan-aims-to-challenge-us-and-china-dominance> (accessed 10 June 2024).

<sup>96</sup> Government of Germany. (2024). *BMDV – Strategy for International Digital Policy of the Federal Government*, available at <https://bmdv.bund.de/SharedDocs/EN/Articles/K/strategy-international-digital-policy.html> (accessed 10 June 2024).

<sup>97</sup> Ibid.

<sup>98</sup> Gouvernement de la République Française. (n.d.). *France 2030*, available at <https://www.info.gouv.fr/grand-dossier/france-2030-en> (accessed 10 June 2024).

<sup>99</sup> Gouvernement de la République Française. (n.d.). *La stratégie nationale pour l'intelligence artificielle*, available at <https://www.entreprises.gouv.fr/fr/numerique/enjeux/la-strategie-nationale-pour-l-ia> (accessed 10 June 2024).

<sup>100</sup> Gouvernement de la République Française. (n.d.). *France 2030*, available at <https://www.info.gouv.fr/grand-dossier/france-2030-en> (accessed 10 June 2024).

<sup>101</sup> Gouvernement de la République Française. (n.d.). *La stratégie nationale pour l'intelligence artificielle*, available at <https://www.entreprises.gouv.fr/fr/numerique/enjeux/la-strategie-nationale-pour-l-ia> (accessed 10 June 2024).

<sup>102</sup> Ibid.

<sup>103</sup> Gouvernement de la République Française, commission de l'IA. (2024). *IA: Notre ambition pour la France*, available at <https://www.info.gouv.fr/upload/media/content/0001/09/4d3cc456dd2f5b9d79ee75feea63b47f10d75158.pdf> (accessed 10 June 2024).

organisations, artists and other members of civil society.<sup>104</sup> The Summit is structured around 5 key themes: AI in the public interest; the future of work; innovation and culture; trust in AI; and AI governance.

In May 2024, France announced that it wanted to create a new AI assessment centre, which could be seen as their national AI safety institute.<sup>105</sup> This collaboration between the “Institut national de recherche en informatique et en automatique” (Inria) and the “Laboratoire national de métrologie et d'essais” has not yet been formalised but could see the light of day at the Paris Summit.<sup>106</sup> The new centre will focus primarily on research and development and will leave the task of international coordination to the EU's AI Office.

### 3.5.5. Denmark

In 2019, Denmark established a national AI strategy that sets the roadmap for how Denmark can be a front-runner in responsible development and use of AI, benefitting individuals, businesses and society as a whole.<sup>107</sup> The national strategy puts forth objectives that focus both on people and on the development of innovation and research. An interesting challenge for Denmark is the development of AI solutions that take into account the Danish language, which is often overlooked by major developers.

Denmark launched an ambitious digitalisation strategy on 16 November 2023. The strategy focuses on the development and integration of AI in both the public and private sectors. The strategy, planned for implementation from 2024 to 2027, consists of 25 initiatives focusing on areas such as AI, the green transition and digital education.<sup>108</sup> As part of the Danish government's digitalisation strategy, the Danish Data Protection Agency, in collaboration with the Danish Agency for Digital Government, is setting up a regulatory sandbox for AI where businesses and authorities can access relevant expertise and advice on the GDPR when developing or using AI solutions.<sup>109</sup>

### 3.5.6. Spain

On 14 May 2024, the Spanish government approved its new *Estrategia de Inteligencia Artificial 2024*<sup>110</sup>, replacing the previous 2020 strategy. This new strategy, drawn up and presented by the Ministry for the Digital Transformation and Civil Service, ensures continuity for the initiatives deployed by the government and adapts them to the technological changes in recent years. It focuses on three areas: capacity building for the development of AI; facilitating the application of AI in the public and private sectors; and promoting transparent, ethical and humanistic AI, the latter in line with the European regulations on the subject promoted during the Spanish Presidency of the European Union in 2023.

In June 2022, Spain became the first EU Member State to present a regulatory sandbox for AI. In addition, Spain played a pioneering role by appointing a new institution specifically to regulate AI in August 2023. The Spanish Agency for the Supervision of Artificial Intelligence (AESIA) is responsible for

<sup>104</sup> Elysee.fr, *Sommet pour l'action sur l'IA*, available at <https://www.elysee.fr/sommet-pour-l-action-sur-l-ia> (accessed 4 December 2024).

<sup>105</sup> International Center for Future generations (2024). *The AI Safety Institute Network: who, what and how?* available at <https://icfg.eu/the-ai-safety-institute-network-who-what-and-how/#1725545495169-0fc364b-d539> (accessed 4 December 2024).

<sup>106</sup> CSIS (2024). *The AI Safety Institute International Network: Next Steps and Recommendations*, available at <https://www.csis.org/analysis/ai-safety-institute-international-network-next-steps-and-recommendations> (accessed 4 December 2024).

<sup>107</sup> Government of Denmark, Agency for Digital Government. (n.d.). *The Danish National Strategy for Artificial Intelligence*, available at <https://en.digst.dk/strategy/the-danish-national-strategy-for-artificial-intelligence/> (accessed 10 June 2024).

<sup>108</sup> DataGuidance. (2023). *Denmark: Government announces digitization strategy with a focus on AI*, available at <https://www.dataguidance.com/news/denmark-government-announces-digitization-strategy#:~:text=Denmark%3A%20Government%20announces%20digitization%20strategy%20with%20a%20focus%20on%20AI,-Artificial%20Intelligence&text=On%20November%2016%2C%202023%2C%20the,the%20public%20and%20private%20sectors> (accessed 10 June 2024).

<sup>109</sup> Datatilsynet.dk. (2024). *Ny regulatorisk sandkasse for AI*, available at <https://www.datatilsynet.dk/presse-og-nyheder/nyhedsarkiv/2024/mar/ny-regulatorisk-sandkasse-for-ai> (accessed 10 June 2024).

<sup>110</sup> España Digital 2026. (2024). *El Gobierno aprueba la Estrategia de Inteligencia Artificial 2024*, available at <https://espanadigital.gob.es/actualidad/aprobada-la-estrategia-de-inteligencia-artificial-2024> (accessed 10 June 2024).

ensuring that the development of AI in the country complies with the principles of inclusion, sustainability and the well-being of citizens, protecting their physical safety and fundamental rights.<sup>111</sup>

### 3.5.7. United Kingdom

After Brexit, the UK has adopted its own positions on AI, which differ from those of the EU. It is nevertheless interesting to understand the UK's position on the AI Act as a third country affected by this EU legislation, particularly when AI systems are exported to the EU.

For some years now, the UK has been striving to position itself as a world leader in AI. The UK recognises the importance of international cooperation to ensure AI safety and effective governance, as demonstrated by the UK AI Safety Summit, the first global AI safety summit held in 2023 at Bletchley Park. The event attracted 28 leading AI countries, including the US, the EU and Switzerland.

Following the Summit, the UK was the first country, along with the US, to create its own AI safety institute, the AISI, whose mission is to focus on the safety of advanced AI for the public interest, by examining, evaluating and testing new types of AI, in order to understand what each new model is capable of.<sup>112</sup> To do this, the UK wants to develop the socio-technical infrastructure needed to understand the risks of advanced AI and enable its governance.

Many of the UK's AI projects were supported by the 2017 Industrial Strategy, which set out the government's vision to make the UK a global centre for AI innovation.<sup>113</sup> In 2021 a new National AI Strategy was published, which builds on the UK's strengths but also represents the beginning of a new phase for AI in the UK, recognising the power of AI to increase resilience, productivity, growth and innovation across the private and public sectors.<sup>114</sup>

The House of Lords introduced an AI Bill in November 2023.<sup>115</sup> The bill aims to establish an AI authority to coordinate the role of existing regulators in ensuring they meet their obligations and identifying any gaps in the AI regulatory landscape. The UK Government's position on the bill under Prime Minister Sunak was that it is premature to legislate on AI until there is a clearer understanding of the risks. Nevertheless, former Prime Minister Rishi Sunak sought to establish an AI regulatory authority in the UK. Although the new Labour government has announced that it plans to introduce a new bill, the approach and direction of travel on AI under the new Prime Minister Keir Starmer is currently still unclear.

Under the former government of Prime Minister Rishi Sunak, the main instrument on AI was a white paper that sets out its main ambitions. The AI white paper, published in March 2023, sets out the UK's plans for creating a new legal framework that should bring clarity and consistency to UK AI regulation. According to the white paper, the regulatory framework must be conducive to innovation, proportionate, trustworthy, adaptable and cooperative. The white paper was the subject of a public consultation during which various organisations were heard. The responses to this consultation were published on 6 February 2024. It remains to be seen to what extent the new government under Prime Minister Keir Starmer will pursue a similar or entirely different course.

#### a. Formal and material content

The aim of the white paper is to support innovation while providing a framework for identifying and addressing risks. In addition, it is essential to define a proportionate regulatory framework that is both

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<sup>111</sup> Holistic AI. (2023). *Spain Becomes First EU Member to Establish AI Regulatory Body*, available at <https://www.holisticai.com/news/spain-ai-regulator> (accessed 10 June 2024).

<sup>112</sup> UK Government (2023), *Introducing the AI Safety Institute*, available at <https://www.gov.uk/government/publications/ai-safety-institute-overview/introducing-the-ai-safety-institute> (accessed 4 December 2024).

<sup>113</sup> UK Government. (2021). *National AI Strategy*, available at <https://www.gov.uk/government/publications/national-ai-strategy> (accessed 10 June 2024).

<sup>114</sup> Ibid

<sup>115</sup> UK Parliament. (2023). *Artificial Intelligence (Regulation) Bill [HL] – Parliamentary Bills*, available at <https://bills.parliament.uk/bills/3519> (accessed 10 June 2024).

pro-innovation and 'context-specific'.<sup>116</sup> The document does not propose a definition of AI, but it does stress the necessity of an outcome-based approach, with the principles of adaptivity and autonomy as guidelines.<sup>117</sup> With the white paper, the UK is moving towards an approach based on the principles of safety, security, robustness, transparency, explainability and fairness.<sup>118</sup> Moreover, the white paper favours voluntary measures over mandatory regulations. The white paper is accordingly not a legally binding instrument.

b. Public-private application

The white paper would apply to both government bodies and private companies.

c. Scope

In contrast to the AI Act, the UK government is focusing on setting expectations for the development and use of AI in different sectors. With this sectoral approach, the government aims to empower existing regulators, such as the Information Commissioner's Office (ICO), the Financial Conduct Authority (FCA) and the Competition and Markets Authority (CMA), to provide guidance and regulate the use of AI within their remit.<sup>119</sup> The government does not intend to develop new AI legislation at the moment but does not rule out the possibility in future.<sup>120</sup>

d. Current status

In March 2024, the Sunak government published its final version of the white paper. The steps that followed were the publication of the regulator approach and explanatory notes, and establishment of the steering committee.<sup>121</sup>

e. Governance

The UK has no plans to introduce a new AI regulator to oversee the implementation of the regulatory framework. Instead, existing regulators, such as the Information Commissioner's Office (ICO), Ofcom (the communications regulator) and the FCA (the Financial Conduct Authority) have been asked to implement the five principles as they regulate and oversee AI within their respective domains. Regulators are expected to use a proportionate context-based approach, utilising existing laws and regulations.

To deal with the various risks associated with AI and to ensure coordination between regulators, however, a new coordinating body has been created, the Central Function, which reports to the DSIT (the Department for Science, Innovation and Technology).

The white paper contains no penalty provisions.

### 3.6. Oceania

Australia and New Zealand are major players in AI. Australia recently adopted guidelines for a measured approach to AI, but nothing more binding. In New Zealand, the government has adopted an AI strategy and a white paper setting out the country's future strategy.<sup>122</sup>

#### 3.6.1. Australia

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<sup>116</sup> Mayer Brown. (2023). *UK's Approach to Regulating the Use of Artificial Intelligence*, available at <https://www.mayerbrown.com/en/insights/publications/2023/07/uks-approach-to-regulating-the-use-of-artificial-intelligence> (accessed 10 June 2024).

<sup>117</sup> Deloitte UK. (2024). *The UK's framework for AI regulation*, available at <https://www.deloitte.com/uk/en/industries/financial-services/blogs/the-uks-framework-for-ai-regulation.html> (accessed 10 June 2024).

<sup>118</sup> Ibid.

<sup>119</sup> Mayer Brown. (2023). *UK's Approach to Regulating the Use of Artificial Intelligence*, available at <https://www.mayerbrown.com/en/insights/publications/2023/07/uks-approach-to-regulating-the-use-of-artificial-intelligence> (accessed 10 June 2024).

<sup>120</sup> Deloitte UK. (2024). *The UK's framework for AI regulation*, available at <https://www.deloitte.com/uk/en/industries/financial-services/blogs/the-uks-framework-for-ai-regulation.html> (accessed 10 June 2024).

<sup>121</sup> Ibid.

<sup>122</sup> AI Researchers Association NZ. (2021). *AIWhitePaper.pdf*, available at [https://www.airesearchers.nz/site\\_files/28243/upload\\_files/AIWhitePaper.pdf?dl=1](https://www.airesearchers.nz/site_files/28243/upload_files/AIWhitePaper.pdf?dl=1) (accessed 10 June 2024).



There is currently no generally applicable law regulating the use of AI in Australia. However, a voluntary framework consisting of eight AI ethical principles was established at federal level in 2019<sup>123</sup>.

In 2021, Australia released an AI action plan<sup>124</sup> setting out the vision for the country to be a global leader in the development and adoption of trusted, safe and responsible AI.

In recent months, a series of consultations, reform proposals and other initiatives from various Australian government agencies suggest that the Australian government is preparing to take a tougher approach to regulating the use of AI, focusing first on high-risk use cases.

A public consultation was launched in June 2023 on how the Australian government can mitigate the potential risks of AI and support safe and responsible AI practices. In January 2024, the Australian government published an interim response<sup>125</sup> to that consultation. Overall, it said it would adopt a risk-based framework to ensure the safe use of AI and prevent harm. Following this consultation, the Minister for Industry and Science set up a group of artificial intelligence experts to advise the government on AI-related issues.<sup>126</sup>

Australia has also recently adopted a new directive on the safe use of AI systems. On 24 January 2024, the Australian Cyber Security Centre (ACSC), part of the Australian Signals Directorate (ASD), adopted the document, which provides guidance to medium and large organisations on how to safely interact with AI, outlining potential threats and mitigation strategies.

For now, Australia is not aiming to create new laws specifically for AI, but rather to use the existing repertoire of legal bases to manage AI<sup>127</sup> – even if it means amending them from time to time – such as legislation on consumer affairs, data protection, competition, copyright and anti-discrimination.

In November 2024, Australia was present at the first meeting of the AI Safety Institute International Network. However, to date, Australia does not have a national AI safety institute. Nevertheless, Australian civil society has raised the urgent need to create this institute to address the needs of research, risk prevention and international collaboration.<sup>128</sup>

a. Formal and material content

The 'Guidance on the secure use of AI'<sup>129</sup>, as it was originally called, contains guidelines that aim to guide stakeholders involved with AI systems, such as programmers, end users, senior executives, analysts and marketers, to understand and manage the risks associated with AI. These measures are not binding and serve only as a guide, describing the steps that businesses can take to use AI safely. This is akin to a market regulation approach, although it is not as strict as in the EU, for example.

b. Public-private application

These guidelines apply only to the private sector.

c. Scope

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<sup>123</sup> Government of Australia, Department of Industry, Science and Resources. (n.d.). *Australia's AI ethics principles*, available at <https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-framework/australias-ai-ethics-principles> (accessed 10 June 2024).

<sup>124</sup> Government of Australia, Department of Industry Science and Resources. (2021). *Australia's Artificial Intelligence Action Plan*, available at <https://www.industry.gov.au/publications/australias-artificial-intelligence-action-plan> (accessed 10 June 2024).

<sup>125</sup> Government of Australia, Department of Industry, Science and Resources. (2024). *The Australian Government's interim response to safe and responsible AI consultation*, available at <https://www.industry.gov.au/news/australian-governments-interim-response-safe-and-responsible-ai-consultation> (accessed 10 June 2024).

<sup>126</sup> Government of Australia, Department of Industry, Science and Resources. (n.d.). *AI expert group terms of reference*, available at <https://www.industry.gov.au/science-technology-and-innovation/technology/artificial-intelligence/ai-expert-group-terms-reference> (accessed 10 June 2024).

<sup>127</sup> ASIC. (2024). *We're not there yet: Current regulation around AI may not be sufficient*, available at <https://asic.gov.au/about-asic/news-centre/speeches/we-re-not-there-yet-current-regulation-around-ai-may-not-be-sufficient/> (accessed 10 June 2024).

<sup>128</sup> Australians for AI Safety (2024). *Australians for AI Safety*, available at <https://www.australiansforaisafety.com.au/> (accessed 4 December 2024).

<sup>129</sup> Australian Cyber Security Centre. (2024). *Engaging with artificial intelligence*, available at <https://www.cyber.gov.au/resources-business-and-government/governance-and-user-education/artificial-intelligence/engaging-with-artificial-intelligence> (accessed 10 June 2024).

This instrument is applied horizontally, across the entire economy.

d. Current status

Adopted in January 2024, the guidelines are currently in force.

e. Governance

The Australian Cyber Security Centre (ACSC) published and adopted these guidelines. It therefore remains the competent authority in this area. Since the guidelines are not binding, no penalties are provided for.

#### 4. Conclusion

This international analysis shows how different countries regulate the use of AI. The analysis shows that there are significant differences between the approaches adopted in different countries.

In effect, AI can be regulated using a variety of instruments, ranging from action plans to legislation. All the countries analysed, with the exception of South Africa and Nigeria, have at least a national strategy or action plan. Of the 20 countries analysed, only the United States and China have legally binding horizontal national instruments specific to AI that are currently being applied.<sup>130</sup> China has chosen a sectoral approach, while the United States has chosen to regulate AI in the form of an executive order, which does not carry the same weight as a law that has gone through the ordinary legislative process. In some of the other countries, entry into force of new instruments is imminent, while others are relying on an existing legal framework to regulate AI.

The trend shows that many countries are developing legally binding instruments on AI, such as Canada, Brazil, South Korea and the UK. It will be interesting to see how and in what form these instruments develop.

The regulatory approaches chosen in the various instruments, whether binding or not, vary from country to country. Canada, Brazil and South Korea are clearly moving towards a risk-based approach, aimed at regulating the economic market. The protection of human rights is also being taken into account in bills in Canada and Brazil. The UK is developing a unique approach in its white paper, highlighting principles and results. In sum, if we look at all the countries analysed, no clear-cut regulatory approach stands out.

Secondly, there are three positions with regard to the scope of the instruments. Some favour a purely public approach, others tend towards a purely private approach, and the majority tend towards an approach that includes both. In effect, only the United States regulates the public sector exclusively. As discussed, however, the US executive order may have an impact on the private sector, albeit indirectly. The strategies of several countries tend towards regulation purely of the private sector. Japan, Australia and Singapore are focusing on providing guidance to industry based on the OECD principles, rather than adopting specific regulations. The most widely adopted approach internationally covers both the public and private sectors. This is the approach favoured by Canada, Brazil, China, South Korea, the UK and others. Looking at all the countries analysed, the approach covering both sectors continues to be preferred.

In terms of their scope, the instruments analysed can be divided into two groups: horizontal or sectoral. The trend currently emerging from international discussions is towards horizontal regulation of AI, as seen in the instruments drawn up by Canada, the United States, Brazil, South Korea and others. Nevertheless, some countries stand out for their sectoral approach. China, Israel and the UK, for example, favour a sectoral approach, which they feel is better suited to dealing with dynamic changes in technology.

As mentioned above, only a small number of countries have legally binding AI instruments that have been adopted and are in force. Most countries are in the negotiation or discussion phase as to the best way to regulate this new technology. Switzerland accordingly seems to be on the right track, with

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<sup>130</sup> It is important to note that other countries have regulations on self-driving vehicles, for example, which have not been taken into account in this analysis.



discussions on this subject currently under way. The next few years will be key to seeing which trends emerge.

The last criterion used for this analysis is the competent authority and implementation of the regulation. There is no single model that all countries apply. In some cases, a new body has been set up to deal with this issue. This is the case in particular in Canada, the United States, the United Kingdom and the United Arab Emirates. Other countries use existing ministries, either in combination with a new body or as the sole competent authority. For example, the UK has appointed the Office of Communications as the lead regulator. Other countries have involved other ministries, such as the ministry of science and innovation, the ministry of justice, the ministry of public safety and so on. Each country has used an approach to governing AI that suits its national administration.

With regard to penalties, only three countries – Canada, Brazil and China – and the EU explicitly mention the mechanism and type of penalties in their document.<sup>131</sup> In the case of Canada and Brazil, penalties can be administrative and/or monetary. In the case of China, the penalties are exclusively monetary.

The AI Safety Summit at Bletchley Park in 2023 also marked the creation of numerous AI Safety Institutes in many countries such as the UK, US, Japan, Canada and many others. In November 2024, the AI Safety Institute International Network met for the first time to accelerate progress in AI safety science.<sup>132</sup>

To conclude, what all the countries have in common is that regulation of AI is deemed necessary, whatever form it takes. Geopolitical differences are taking shape, with the United States and China tending towards contrasting approaches.

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<sup>131</sup> It should be borne in mind that many countries are still in the process of drawing up legal instruments and have not yet addressed the issue.

<sup>132</sup> UK Government (2023), *Introducing the AI Safety Institute*, available at <https://www.gov.uk/government/publications/ai-safety-institute-overview/introducing-the-ai-safety-institute> (accessed 4 December 2024).

## 5. Bibliography

### Literature

African Union (2023)

*Powering Africa's Digital Future: AU Ministerial Meeting set to ignite Digital Transformation in Africa*, available under <https://au.int/en/pressreleases/20231121/powering-africas-digital-future-au-ministerial-meeting-set-ignite-digital#:~:text=African%20Ministers%20of%20ICT%20and,driving%20Africa%27s%20digital%20agenda%20forward> (last consulted 10 June 2024).

AI Researchers Association NZ (2021)

*AI White Paper.pdf*, available under [https://www.airesearchers.nz/site\\_files/28243/upload\\_files/AIWhitePaper.pdf?dl=1](https://www.airesearchers.nz/site_files/28243/upload_files/AIWhitePaper.pdf?dl=1) (last consulted 10 June 2024).

ANSI (2023)

*Leading AI Companies Sign U.S. Government Commitment on Safety, Security, and Trust in AI Development*, available under <https://www.ansi.org/standards-news/all-news/2023/07/7-21-23-leading-ai-companies-sign-us-government-commitment> (last consulted 10 June 2024).

Anzini Eipa (2021)

*The Artificial Intelligence Act Proposal and its Implications for Member States*, available under <https://www.eipa.eu/publications/briefing/the-artificial-intelligence-act-proposal-and-its-implications-for-member-states/> (last consulted 10 June 2024).

ASIC (2024)

*We're not there yet: Current regulation around AI may not be sufficient*, available under <https://asic.gov.au/about-asic/news-centre/speeches/we-re-not-there-yet-current-regulation-around-ai-may-not-be-sufficient/> (last consulted 10 June 2024).

Association for Progressive Communications (2024)

*The risks of artificial intelligence and the response of Korean civil society*, available under <https://www.apc.org/en/blog/risks-artificial-intelligence-and-response-korean-civil-society> (last consulted 10 June 2024).

Australian Cyber Security Centre (2024)

*Engaging with artificial intelligence*, available under <https://www.cyber.gov.au/resources-business-and-government/governance-and-user-education/artificial-intelligence/engaging-with-artificial-intelligence> (last consulted 10 June 2024).

Carnegie Endowment for International Peace (2023)

*Lessons From the World's Two Experiments in AI Governance*, available under <https://carnegieendowment.org/posts/2023/02/lessons-from-the-worlds-two-experiments-in-ai-governance?lang=en> (last consulted 10 June 2024).

Carnegie Endowment for International Peace (2024)

*Korea's Path to Digital Leadership*. (n.d.), available under <https://carnegieendowment.org/2024/02/28/digital-policy-report-card-for-south-korea-pub-91833> (last consulted 10 June 2024).

Carnegie Endowment for International Peace (2024)

*Tracing the Roots of China's AI Regulations*, available under <https://carnegieendowment.org/2024/02/27/tracing-roots-of-china-s-ai-regulations-pub-91815#:~:text=China%20is%20regulating%20AI%2C%20and,transformative%20technologies%20of%20our%20time> (last consulted 10 June 2024).

Cointelegraph (2023)

*How Nigeria stepped up its AI game in 2023*, available under <https://cointelegraph.com/news/how-nigeria-stepped-up-its-ai-game-in-2023> (last consulted 10 June 2024).

CSIS (2024)

*The AI Safety Institute International Network: Next Steps and Recommendations*, available under <https://www.csis.org/analysis/ai-safety-institute-international-network-next-steps-and-recommendations> (last consulted 4 December 2024).

DataGuidance (2024)

- Japan: MIC and METI request public comments on draft AI business guidelines*, available under <https://www.dataguidance.com/news/japan-mic-and-meti-request-public-comments-draft-ai> (last consulted 10 June 2024).
- Datatilsynet.dk (2024)  
*Ny regulatorisk sandkasse for AI*, available under <https://www.datatilsynet.dk/presse-og-nyheder/nyhedsarkiv/2024/mar/ny-regulatorisk-sandkasse-for-ai> (last consulted 10 June 2024).
- Deloitte UK (2024)  
*The UK's framework for AI regulation*, available under <https://www.deloitte.com/uk/en/Industries/financial-services/blogs/the-uks-framework-for-ai-regulation.html> (last consulted 2 December 2024).
- Digital Watch Observatory (2023)  
*Germany's ambitious AI action plan aims to challenge US and China dominance*, available under <https://dig.watch/updates/germanys-ambitious-ai-action-plan-aims-to-challenge-us-and-china-dominance> (last consulted 10 June 2024).
- ECDPM (2024)  
*Envisioning Africa's AI governance landscape in 2024 – ECDPM Briefing Note 177*, available under <https://ecdpm.org/application/files/7017/0651/8711/Envisioning-Africas-AI-Governance-Landscape-in-2024-ECDPM-Briefing-Note-177-2024.pdf> (last consulted 10 June 2024).
- ECDPM (2023)  
*Looking into the crystal ball: Artificial intelligence policy and regulation in Africa*, available under <https://ecdpm.org/work/looking-crystal-ball-artificial-intelligence-policy-regulation-africa> (last consulted 10 June 2024).
- España Digital 2026 (2024)  
*El Gobierno aprueba la Estrategia de Inteligencia Artificial 2024*, available under <https://espanadigital.gob.es/actualidad/aprobada-la-estrategia-de-inteligencia-artificial-2024> (last consulted 10 June 2024).
- European Commission (2024)  
*Commission establishes AI Office to strengthen EU leadership in safe and trustworthy Artificial Intelligence*, available under [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_24\\_2982](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_2982) (last consulted 4 December 2024).
- Garrigues Digital (2024)  
*Regulating AI in the EU, US and OECD: the difficult balance between security and driving innovation*, available under [https://www.garrigues.com/en\\_GB/garrigues-digital/regulating-ai-eu-us-and-oecd-difficult-balance-between-security-and-driving](https://www.garrigues.com/en_GB/garrigues-digital/regulating-ai-eu-us-and-oecd-difficult-balance-between-security-and-driving) (last consulted 10 June 2024).
- Government of Japan, Ministry of Economy, Trade and Industry (2024)  
*Outline of the draft "AI Guidelines for Business"*, available under [https://www.meti.go.jp/shingikai/mono\\_info\\_service/ai\\_shakai\\_jisso/pdf/20240119\\_6.pdf](https://www.meti.go.jp/shingikai/mono_info_service/ai_shakai_jisso/pdf/20240119_6.pdf) (last consulted 10 June 2024).
- Government of Taiwan, National Science and Technology Council (2022)  
*2022 Taiwan AI-Readiness Assessment Report*, available under <https://digi.nstc.gov.tw/File/5AF024B4C7281A84/e761bee6-a38c-4d5b-8481-fc36b83b25d8?A=C> (last consulted 10 June 2024).
- Holistic AI (2023)  
*How is Brazil Leading South America's AI Legislation Efforts?* Available under <https://www.holisticai.com/blog/brazil-ai-legislation-proposals> (last consulted 10 June 2024).
- Holistic AI (2023)  
*Spain Becomes First EU Member to Establish AI Regulatory Body*, available under <https://www.holisticai.com/news/spain-ai-regulator> (last consulted 10 June 2024).
- Holistic AI (2024)  
*Making Sense of China's AI Regulations*, available under <https://www.holisticai.com/blog/china-ai-regulation> (last consulted 10 June 2024).
- Infocomm Media Development Authority (2024)

- Digital Trust Centre designated as Singapore's AI Safety Institute*, available under <https://www.imda.gov.sg/resources/press-releases-factsheets-and-speeches/factsheets/2024/digital-trust-centre> (last consulted 4 December 2024).
- International Association of Privacy Professionals (2024)  
*Global AI governance: Singapore*, available under <https://iapp.org/resources/article/global-ai-governance-singapore/> (last consulted 10 June 2024).
- International Center for Future generations (2024)  
*The AI Safety Institute Network: who, what and how?* available under <https://icfg.eu/the-ai-safety-institute-network-who-what-and-how/#1725545495169-0fcf364b-d539> (last consulted 4 December 2024).
- K&L gates (2024)  
*Taiwan's National Science and Technology Council Has Published the Draft Bill of the Basic Act on Artificial Intelligence for Public Consultation*, available under <https://www.klgates.com/Taiwans-National-Science-and-Technology-Council-Has-Published-The-Draft-Bill-Of-The-Basic-Act-On-Artificial-Intelligence-For-Public-Consultation-8-1-2024> (last consulted 2 December 2024).
- Langlois avocats (2023)  
*Encadrement légal de l'intelligence artificielle : où en sommes-nous au Canada et au Québec ?* available under <https://langlois.ca/ressources/encadrement-legal-de-lintelligence-artificielle-ou-en-sommes-nous-au-canada-et-au-quebec> (last consulted 10 June 2024).
- Lee and Li, Attorneys-at-Law (2024)  
*Artificial Intelligence and Copyright Laws: A Comprehensive View on Worldwide Legislation of Artificial Intelligence-related Drafts in Response to Copyright Infringement*, available under [www.leeandli.com/EN/Newsletters/7219.html](http://www.leeandli.com/EN/Newsletters/7219.html) (last consulted 10 June 2024).
- Library of Congress (2023)  
*China: Provisions on Deep Synthesis Technology Enter into Effect*, available under <https://www.loc.gov/item/global-legal-monitor/2023-04-25/china-provisions-on-deep-synthesis-technology-enter-into-effect/> (last consulted 10 June 2024).
- Mattos Filho (2024)  
*Regulatory framework for artificial intelligence passes in Brazil's Senate*, available under <https://www.mattosfilho.com.br/en/unico/framework-artificial-intelligence-senate/> (last consulted 16 December 2024).
- Mayer Brown (2023)  
*UK's Approach to Regulating the Use of Artificial Intelligence*, available under <https://www.mayerbrown.com/en/insights/publications/2023/07/uks-approach-to-regulating-the-use-of-artificial-intelligence> (last consulted 10 June 2024).
- MIT Technology Review (2024)  
*Africa's push to regulate AI starts now*, available under <https://www.technologyreview.com/2024/03/15/1089844/africa-ai-artificial-intelligence-regulation-au-policy/> (last consulted 10 June 2024).
- Monetary Authority of Singapore (2020)  
*FEAT Principles Final.pdf*, available under <https://www.mas.gov.sg/~media/MAS/News%20and%20Publications/Monographs%20and%20Information%20Papers/FEAT%20Principles%20Final.pdf> (last consulted 10 June 2024).
- Mundie Advogados (2023)  
*Highlights*, available under <http://mundieadvogados.com.br/Highlights.en.807> (last consulted 10 June 2024).
- Olisa Agbakoba Legal (2023)  
*Artificial Intelligence (AI) Regulation in Nigeria: Key Considerations, Recommendations, Legal Framework, and Policy Development for Artificial Intelligence (AI) in Nigeria*, available under [https://oal.law/artificial-intelligence-ai-regulation-in-nigeria-key-considerations-recommendations-legal-framework-and-policy-development-for-artificial-intelligence-ai-in-nigeria/?utm\\_source=Mondaq&utm\\_medium=syndication&utm\\_campaign=LinkedIn-integration&utm\\_source=mondaq&utm\\_medium=syndication&utm\\_term=technology&utm\\_content=articleoriginal&utm\\_campaign=article](https://oal.law/artificial-intelligence-ai-regulation-in-nigeria-key-considerations-recommendations-legal-framework-and-policy-development-for-artificial-intelligence-ai-in-nigeria/?utm_source=Mondaq&utm_medium=syndication&utm_campaign=LinkedIn-integration&utm_source=mondaq&utm_medium=syndication&utm_term=technology&utm_content=articleoriginal&utm_campaign=article) (last consulted 10 June 2024).
- OSTP | The White House (n.d.)

*Blueprint for an AI Bill of Rights*, available under <https://www.whitehouse.gov/ostp/ai-bill-of-rights/> (last consulted 10 June 2024).

Taylor Wessing (2023)

*AI Regulation Around the World*, available under <https://www.taylorwessing.com/en/interface/2023/ai---are-we-getting-the-balance-between-regulation-and-innovation-right/ai-regulation-around-the-world> (last consulted 10 June 2024).

United States Government (2024)

*Highlights of the 2023 Executive Order on Artificial Intelligence for Congress*, available under <https://crsreports.congress.gov/product/pdf/R/R47843#:~:text=Safety%20and%20Security-,The%20E.O.,security%2C%20and%20critical%20infrastructure%20risk> (last consulted 10 June 2024).

White & Case (2024)

*AI Watch: global regulatory tracker – South Korea*, available under <https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-south-korea> (last consulted 2 December 2024).

## Web pages

Agenzia per l'Italia Digitale

*The Italian Strategy for Artificial Intelligence 2024-2026*, available under <https://www.agid.gov.it/en/agenzia/stampa-e-comunicazione/notizie/2024/07/22/italian-strategy-artificial-intelligence-2024-2026> (last consulted 4 December 2024).

AIM AT 2030

*Artificial Intelligence Mission Austria 2030*, available under <https://www.ki-strategie.at/> (last consulted 4 December 2024).

AISI Japan AI Safety Institute

*Overview*, available under <https://aisi.go.jp/> (last consulted 4 December 2024).

Australians for AI Safety

*Australians for AI Safety*, available under <https://www.australiansforaisafety.com.au/> (last consulted 4 December 2024).

Canada.ca

*Consultation sur l'élaboration d'un code de pratique canadien pour les systèmes d'intelligence artificielle générative*, available under <https://ised-isde.canada.ca/site/ised/fr/consultation-lelaboration-dun-code-pratique-canadien-pour-systemes-dintelligence-artificielle> (last consulted 10 June 2024).

Canada.ca

*Canada launches Canadian Artificial Intelligence Safety Institute*, available under <https://www.canada.ca/en/innovation-science-economic-development/news/2024/11/canada-launches-canadian-artificial-intelligence-safety-institute.html> (last consulted 4 December 2024).

Canada.ca

*Stratégie pancanadienne en matière d'intelligence artificielle*, available under <https://ised-isde.canada.ca/site/strategie-ia/fr> (last consulted 10 June 2024).

Canada.ca

*Utilisation responsable de l'intelligence artificielle (IA)* available under <https://www.canada.ca/fr/gouvernement/systeme/gouvernement-numerique/innovations-gouvernementales-numeriques/utilisation-responsable-ai.html> (last consulted 10 June 2024).

CIFAR

*Stratégie pancanadienne en matière d'IA*, available under <https://cifar.ca/fr/ia/> (last consulted 10 June 2024).

Cliffe Dekker Hofmeyr

*Regulation of AI in South Africa*, available under <https://www.cliffedekkerhofmeyr.com/news/media/2024/Technology/Regulation-of-AI-in-South-Africa> (last consulted 10 June 2024).

DataGuidance

*Denmark: Government announces digitization strategy with a focus on AI*, available under <https://www.dataguidance.com/news/denmark-government-announces-digitization-strategy#:~:text=Denmark%3A%20Government%20announces%20digitization%20strategy%20with%20a%20focus%20on%20AI,-Artificial%20Intelligence&text=On%20November%2016%2C%202023%2C%20the,the%20public%20and%20private%20sectors> (last consulted 10 June 2024).

Digital Austria

*Artificial Intelligence Mission Austria 2030*, available under <https://www.digitalaustria.gv.at/eng/strategy/strategy-AI-AIM-AT-2030.html> (last consulted 4 December 2024).

Elysee.fr

*Sommet pour l'action sur l'IA*, available under <https://www.elysee.fr/sommet-pour-l-action-sur-l-ia> (last consulted 4 December 2024).

Gouvernement de la République Française, commission de l'IA



- IA ambition pour la France*, available under <https://www.info.gouv.fr/upload/media/content/0001/09/4d3cc456dd2f5b9d79ee75feea63b47f10d75158.pdf> (last consulted 10 June 2024).
- Gouvernement de la République Française  
*France 2030*, available under <https://www.info.gouv.fr/grand-dossier/france-2030> (last consulted 10 June 2024).
- Gouvernement de la République Française  
*La stratégie nationale pour l'intelligence artificielle*, available under <https://www.entreprises.gouv.fr/fr/numerique/enjeux/la-strategie-nationale-pour-l-ia> (last consulted 10 June 2024).
- Government of Australia, Department of Industry Science and Resources  
*Australia's Artificial Intelligence Action Plan*, available under <https://www.industry.gov.au/publications/australias-artificial-intelligence-action-plan> (last consulted 10 June 2024).
- Government of Australia, Department of Industry, Science and Resources  
*AI expert group terms of reference*, available under <https://www.industry.gov.au/science-technology-and-innovation/technology/artificial-intelligence/ai-expert-group-terms-reference> (last consulted 10 June 2024).
- Government of Australia, Department of Industry, Science, and Resources  
*Australia's AI ethics principles*, available under <https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-framework/australias-ai-ethics-principles> (last consulted 10 June 2024).
- Government of Denmark, Agency for Digital Government  
*The Danish National Strategy for Artificial Intelligence*, available under <https://en.digst.dk/strategy/the-danish-national-strategy-for-artificial-intelligence/> (last consulted 10 June 2024).
- Government of Germany, KI Strategie  
*Home - KI Strategie*, available under <https://www.ki-strategie-deutschland.de/> (last consulted 10 June 2024).
- Government of Germany  
*BMDV - Strategy for International Digital Policy of the Federal Government*, available under <https://bmdv.bund.de/SharedDocs/EN/Articles/K/strategy-international-digital-policy.html> (last consulted 10 June 2024).
- Government of Japan, Cabinet Office  
*AI Strategy 2022*, available under <https://www8.cao.go.jp/cstp/ai/aistratagy2022en.pdf> (last consulted 10 June 2024).
- Government of Japan, Ministry of Internal Affairs and Communications  
*Hiroshima AI Process*, available under <https://www.soumu.go.jp/hirosshimaaiprocess/en/index.html> (last consulted 10 June 2024).
- Government of Singapore  
*National AI Strategy*, available under <https://file.go.gov.sg/nais2023.pdf> (last consulted 10 June 2024).
- ITWeb AI Summit 2024 Conference  
 Available under <https://www.itweb.co.za/event/itweb-ai-summit-2024/> (last consulted 10 June 2024).
- Ministry of Innovation, Science and Technology  
*Israel's Policy on Artificial Intelligence Regulation and Ethics*, available under [https://www.gov.il/en/pages/ai\\_2023](https://www.gov.il/en/pages/ai_2023) (last consulted 10 June 2024).
- NIST  
*US Artificial Intelligence Safety Institute*, available under <https://www.nist.gov/aisi> (last consulted 4 December 2024).
- NIST  
*AI Risk Management Framework*, available under <https://www.nist.gov/itl/ai-risk-management-framework> (last consulted 10 June 2024).

OCDE

*L'intelligence artificielle*, available under <https://www.oecd.org/fr/themes/intelligence-artificielle.html> (last consulted 10 June 2024).

OECD

*AI Principles Overview*, available under <https://oecd.ai/en/ai-principles> (last consulted 10 June 2024).

OECD

*NATIONAL AI STRATEGY Policy*, available under <https://oecd.ai/en/dashboards/policy-initiatives/http:%2F%2Faipo.oecd.org%2F2021-data-policyInitiatives-26499> (last consulted 10 June 2024).

OECD.AI

*ETHICAL NORMS FOR NEW GENERATION AI Policy*, available under <https://oecd.ai/en/dashboards/policy-initiatives/http:%2F%2Faipo.oecd.org%2F2021-data-policyInitiatives-27190> (last consulted 10 June 2024).

Stanford.edu

*Full Translation: China's 'New Generation Artificial Intelligence Development Plan' (2017)*, available under <https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/> (last consulted 10 June 2024).

The American Presidency Project

*2024 GOP Platform Make America Great Again*, available under <https://www.presidency.ucsb.edu/documents/2024-republican-party-platform> (last consulted 2 December 2024).

UAE Artificial Intelligence Office

*UAE National Strategy for Artificial Intelligence 2031*, available under <https://ai.gov.ae/wp-content/uploads/2021/07/UAE-National-Strategy-for-Artificial-Intelligence-2031.pdf> (last consulted 10 June 2024).

UAE Artificial Intelligence Office

*About | Artificial Intelligence Office, UAE*, available under [https://ai.gov.ae/about\\_us/](https://ai.gov.ae/about_us/) (last consulted 10 June 2024).

UK Government

*Introducing the AI Safety Institute*, available under <https://www.gov.uk/government/publications/ai-safety-institute-overview/introducing-the-ai-safety-institute> (last consulted 4 December 2024).

UK Government

*National AI Strategy*, available under <https://www.gov.uk/government/publications/national-ai-strategy> (last consulted 10 June 2024).

UK Government

*AI Seoul Summit 2024*, available under <https://www.gov.uk/government/topical-events/ai-seoul-summit-2024> (last consulted 10 June 2024).

Government of Australia, Department of Industry, Science and Resources

*The Australian Government's interim response to safe and responsible AI consultation*, available under <https://www.industry.gov.au/news/australian-governments-interim-response-safe-and-responsible-ai-consultation> (last consulted 10 June 2024).



## Legal bases and standards

Canada.ca

*Directive sur la prise de décisions automatisée*, available under <https://www.tbs-sct.canada.ca/pol/doc-fra.aspx?id=32592> (last consulted 10 June 2024).

Canada.ca

*The Artificial Intelligence and Data Act (AIDA) – Companion document*, available under <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document> (last consulted 10 June 2024).

Canada.ca

*Loi sur l'intelligence artificielle et les données*, available under <https://ised-isde.canada.ca/site/innover-meilleur-canada/fr/loi-lintelligence-artificielle-donnees> (last consulted 10 June 2024).

China Law Translate

*Provisions on the Management of Algorithmic Recommendations in Internet Information Services*, available under <https://www.chinalawtranslate.com/en/algorithms/> (last consulted 10 June 2024).

China Law Translate

*Interim Measures for the Management of Generative Artificial Intelligence Services*, available under <https://www.chinalawtranslate.com/en/generative-ai-interim/> (last consulted 10 June 2024).

European Union

Regulation (EU) 2021/0106 of the European Parliament and of the Council laying down harmonized rules on artificial intelligence (EU AI Act). Official Journal of the European Union, available under <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52021PC0206> (last consulted 10 June 2024).

Justice.gc.ca

*Projet de loi C-27 : Loi édictant la Loi sur la protection de la vie privée des consommateurs, la Loi sur le Tribunal de la protection des renseignements personnels et des données et la Loi sur l'intelligence artificielle et les données et apportant des modifications corrélatives et connexes à d'autres lois*, available under [https://www.justice.gc.ca/fra/sjc-csj/pl/charte-charter/c27\\_1.html](https://www.justice.gc.ca/fra/sjc-csj/pl/charte-charter/c27_1.html) (last consulted 10 June 2024).

Parlement du Canada

*C-27 (44-1) – LEGISinfo*, available under <https://www.parl.ca/legisinfo/fr/projet-de-loi/44-1/c-27> (last consulted 2 December 2024).

Senado Federal

*PL 2338/2023*, available under <https://www25.senado.leg.br/web/atividade/materias/-/materia/157233> (last consulted 10 June 2024).

The White House

*Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*, available under <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/10/30/executive-order-on-the-safe-secure-and-trustworthy-development-and-use-of-artificial-intelligence/> (last consulted 10 June 2024).

UK Parliament

*Artificial Intelligence (Regulation) Bill [HL] - Parliamentary Bills*, available under <https://bills.parliament.uk/bills/3519> (last consulted 10 June 2024).