

# Brussels just gave you a **runway**. Most teams will hear **a pause**.

On May 7, EU legislators delayed the AI Act's high-risk obligations to December 2, 2027. Cue the celebration emails. Here is what your competitors are about to miss.

● EU COUNCIL AGREEMENT · MAY 7, 2026

THE GIFT

## +18<sub>mo</sub>

extra runway for high-risk AI Act obligations  
New lock-in: December 2, 2027

STILL DUE

## Dec 2

### 2026

Article 50 transparency & watermarking obligations apply  
Shortened 3-month grace period · this is a 2026 deadline

THE SHORTCUT

## ~70%

of EU AI Act high-risk docs already covered by ISO 42001  
Fastest credible signal for procurement & regulators

## What the delay **actually** changed

5 THINGS MOST TEAMS WILL MISS

**1 The bans got broader, not narrower**  
Non-consensual intimate imagery and CSAM systems are now explicitly prohibited, with both provider and deployer liability. If your product touches generative image workflows at all, your prohibited-use policy needs an update this quarter.

THIS QUARTER

**2 Watermarking tightened — and it's a 2026 deadline**  
Article 50 transparency obligations apply from December 2, 2026, with a shortened 3-month grace period. The headline 2027 date does not cover you here.

DEC 2, 2026

**3 Enforcement got more centralized**  
The AI Office picks up direct supervision for systems built on the provider's own general-purpose model. National regulators stay carved out for law enforcement, borders, judiciary, and financial supervision. Know which regulator owns your file.

**4 The conformity work did not get easier**  
The 18 months is for adopting harmonized standards, not for postponing the work. Companies that wait will hit the same wall in 2027 — with less talent available and rates already climbing.

**5 ISO 42001 quietly became the practical answer**  
It covers roughly 70% of EU AI Act high-risk documentation requirements and is the fastest credible signal of conformance for procurement, partners, and regulators. The CTOs and CCOs who win this window will use it to operationalize an AI management system that survives the next regulatory shift — from Brussels, Hartford, or Denver.

ISO 42001 covers ~70%

your delta · 30%

## The new EU AI Act calendar

POST MAY 7 AGREEMENT

TODAY

May 2026

Bans & GPAI duties  
Prohibitions in force · GPAI obligations live

+7 MONTHS

Dec 2, 2026

Article 50 transparency  
Watermarking · 3-month grace

+19 MONTHS

Dec 2, 2027

High-risk obligations  
Delayed lock-in for Annex III systems

+27 MONTHS

Aug 2, 2028

Annex I products  
Product-embedded high-risk systems

Will your team treat the next 18 months as a **runway** — or quietly file it as a **pause**?

OPERATIONALIZE

DEPRIORITIZE