

Global AI Legislation Summary Table

Summarised by:

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Overarching / National Laws

Jurisdiction & Law	Risk-Based vs. Rights-Based	Regulatory vs. Voluntary	AI, ML, or Both	Scope Level
EU — AI Act: transparency & watermarking	Risk-based (unacceptable / high / limited / minimal tiers); also protects fundamental rights as a stated purpose Limited (“ transparency ”) tier that applies horizontally, whatever the system’s risk class. Art. 50 duties: (1) tell people when they are interacting with an AI system; (2) providers mark synthetic audio, image, video and text outputs in a machine-readable, detectable format (watermarking); (3) deployers inform people exposed to emotion recognition or biometric categorisation; (4) deployers disclose deepfakes and AI-generated text published on matters of public interest.	Regulatory — binding EU law <i>Key dates: in force 1 Aug 2024; prohibitions 2 Feb 2025; GP AI duties 2 Aug 2025; transparency (Art. 50) 2 Aug 2026; high-risk (Annex III) 2 Dec 2027 after the Digital Omnibus.</i> Regulatory — binding EU law (Art. 50) <i>Dates: apply from 2 Aug 2026. Art. 50(2) marking applies from 2 Aug 2026 to systems placed on the market on or after that date, and from 2 Dec 2026 to generative systems already on the market before 2 Aug 2026 (Digital Omnibus, Reg. (EU) 2026/1744, in force 27 Jul 2026).</i>	Both — including general-purpose AI systems and generative AI	Overarching, EU-wide (supersedes member-state AI laws)
South Korea — AI Basic Act (“Act on the Development of Artificial Intelligence and Establishment of Trust”)	Risk-based (“high-impact AI” category, 11 high-risk categories) with a stated rights goal (protect rights and interests of the people)	Regulatory — notification, risk management, documentation, and impact-assessment duties; fines up to 30 million won and corrective orders	Both — applies uniformly to “business operators” rather than distinct provider/deployer roles	Overarching, national
Japan — AI Promotion Act (“Act on the Promotion of Research and Development and the Utilization of AI-Related Technologies”)	Principles-based / innovation-first ; not organized around a risk tier system	Voluntary / soft law — government can investigate and advise, but there are no penalties for noncompliance	Both	Overarching, national
China — national AI regime (Algorithm Recommendation Provisions; Interim Measures for Generative AI Services; Deep Synthesis Provisions; AI guidelines; Scientific and Technological Ethics Regulation)	Hybrid — not organized as a single risk-tiered statute, but built on a network of use-case-specific laws, regulations, and standards	Regulatory — security review and algorithm registration required for generative AI services capable of influencing public opinion; research institutions exempt	Both, with heavy emphasis on generative AI and recommendation algorithms	Overarching in effect (no single consolidated “AI Act,” but a dense national regulatory patchwork)
United States — Federal level (Executive Orders + federal guidance)	No unified risk tier; the “National Policy Framework” EO discourages new state-level AI regulation viewed as excessive	Mixed — EOs are directive/policy (not statute); the TAKE IT DOWN Act is regulatory (binding platform obligations on deepfake/nonconsensual imagery – 48 hr rule); the Blueprint for an AI Bill of Rights is an explicitly voluntary framework; OMB guidance binds federal agencies only	Both	Overarching in intent, not in fact — a policy framework and guidance patchwork, not comprehensive horizontal legislation
United States — existing regulatory requirements (FTC, Consumer Financial Protection Bureau)	Not AI-specific; existing consumer-protection/fair-lending frameworks applied to AI/ML (e.g., adverse credit decisions, “black box” models)	Regulatory — enforced under existing statutory authority (Section 5 of the FTC Act, fair lending law)	Both	Sectoral (consumer protection, financial services) applied to AI in the near term absent comprehensive federal AI law
Brazil — proposed AI Act	Risk-based (three levels of risk, similar to the EU AI Act) and rights-based (proposes rights such as an explanation of an AI system’s decision, recommendation, or prediction; clear rules for damages)	Not yet law — a comprehensive bill still moving through the legislature	Both	Would be overarching, national
Canada — Voluntary Code of Conduct (on the Responsible Development and Management of Advanced Generative AI Systems)	Risk-based in spirit (encourages fairness, safety, human oversight) but not codified into binding risk tiers	Voluntary — a temporary, non-binding measure enabling companies to self-demonstrate responsible practices	Both, generative AI in particular	Overarching, national (interim measure)
India	Government AI governance principles and a proposed Digital India Act would introduce risk-based regulation of high-risk AI systems; MeitY advisories are transparency/rights-adjacent (labelling unreliable AI output)	Currently mostly advisory/voluntary — national committees and a policy framework; the Digital India Act (not yet passed) would be regulatory	Both	Overarching, national (largely proposed/advisory today)
Singapore	Principles-based / rights-adjacent (explainable, transparent, fair decision-making; human-centric AI) rather than a formal risk tier	Voluntary — Model AI Governance Framework (2019, traditional AI) and Model AI Governance Framework for Generative AI (2024) are both non-binding; supported by the AI Verify testing toolkit	Both, with a dedicated generative AI framework	Overarching, national (voluntary), with a sectoral regulatory layer (see below)
United Kingdom	Principles-based, not organized around a risk tier	Regulator-led, non-statutory — a “context-based” oversight approach; no central AI law as of 2025, though a Frontier AI Bill has been discussed	Both	Overarching in policy, sectoral in enforcement (each existing regulator applies the approach within its own remit)

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Other EU member states / European countries (Italy, Spain, Switzerland, Norway, Turkey)	Varies by country; largely supplementary to the EU AI Act’s risk-based structure	Some developing or debating national AI bills; some establishing new AI supervisory agencies or national strategies	Both	National, supplementing (EU members) or paralleling (non-EU: Switzerland, Norway, Turkey) the EU AI Act
Global / international (UN, OECD, UNESCO, G7)	Principles-based (responsible AI, human rights-oriented framing)	Voluntary, non-binding — a UN draft resolution encouraging national AI regulation; OECD/UNESCO/G7 principles guide but do not bind	Both	Overarching, multilateral

Regional / Sub-National (State & City) Laws — United States

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Colorado AI Act (SB 24-205)	Risk-based — targets “consequential decisions” made by high-risk AI; imposes duties tied to algorithmic discrimination (rights-adjacent goal)	Regulatory	Both	Regional (state)
California — Transparency in Frontier Artificial Intelligence Act (TFAIA / SB 53)	Risk-based — applies reasonable rules/limits to the most advanced (“frontier”) AI systems	Regulatory	Both, aimed at frontier/large-scale models	Regional (state)
California — Generative AI: Training Data Transparency (AB 2013)	Rights-based (transparency/disclosure)	Regulatory	Focused on generative AI	Regional (state)
California — AI Transparency Act (SB 942)	Rights-based (transparency/labelling)	Regulatory	Focused on generative AI outputs	Regional (state)
California — BOT Act	Rights-based (disclosure)	Regulatory — prohibits undisclosed bot use to encourage a sale	Focused on conversational/bot AI	Regional (state)
Texas — Responsible Artificial Intelligence Governance Act (HB 149)	Not detailed in source beyond “Responsible AI Governance” framing; risk-based in structure typical of this law family	Regulatory	Both	Regional (state)
Utah — AI Policy Act (SB 149) and AI Consumer Protection Amendments (SB 226)	Rights-based (consumer disclosure focus)	Regulatory	Both	Regional (state)
New York City — Local Law 144	Rights-based (anti-bias in hiring)	Regulatory — requires independent bias audits of AI-enabled employment tools	Focused on automated employment decision tools	Sectoral (employment) + municipal

Sectoral / Regional Layers Elsewhere in the World

Jurisdiction / Regime	Risk-Based vs. Rights-Based	Regulatory vs. Voluntary	AI/ML Scope	Scope Level
China — municipal law	Varies locally; includes potential bans on AI/metaverse technology that threatens national security, personal privacy, health, or enables discrimination	Regulatory — municipalities have passed additional oversight, including compliance audits	Both	Regional (municipal), supplementing national law
Singapore — sectoral regulation (e.g., financial services, health)	Not detailed as risk-tiered in source; applies existing sector rules to AI use	Regulatory	Both	Sectoral, supplementing the national voluntary framework
UAE / Abu Dhabi Global Market / Dubai International Financial Centre	Rights-based, extending data-protection logic to AI (DIFC Regulation 10 governs personal-data processing by autonomous/semi-autonomous systems)	Regulatory — existing data laws amended in financial free zones; federal decrees guide government AI use	Both	Sectoral (financial free zones) + national (government use)
Kenya, Nigeria, South Africa	Rights-based — human rights and algorithmic accountability focus	Mostly in consultation or draft stage — national AI strategies, codes of practice, and draft laws, not yet binding	Both	National (largely proposed)
Australia, Taiwan	Mixed — sector-specific initiatives plus draft legislation touching algorithmic fairness and data transparency (rights-based elements)	Mix of voluntary codes and draft (not-yet-binding) legislation	Both	Sectoral + national (draft)

Reading the Table

- Only a handful of jurisdictions have binding, comprehensive, risk-tiered AI statutes today: the EU (AI Act) and South Korea (AI Basic Act) are the clearest examples. China’s is binding but built from multiple use-case-specific instruments rather than one consolidated act. Voluntary/soft-law approaches remain common, especially in the Asia-Pacific (Japan, Singapore) and in Canada, often positioned as an interim step ahead of eventual binding rules. Rights-based and risk-based logic are rarely mutually exclusive — most of the laws blend a risk-tier structure (obligations scaling with potential harm) with rights-oriented goals such as non-discrimination, explanation, and transparency.
- The U.S. pattern is bottom-up: no comprehensive federal AI statute exists; regulation is currently concentrated in state and city laws (Colorado, California, Texas, Utah, NYC), layered on top of existing sectoral enforcement (FTC, CFPB) and non-binding federal guidance, with a federal policy stance (per the December 2025 Executive Order) actively discouraging further state-level regulation.